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DEC 17 1979
SECURITY

To: Mr. J. Oliviero
Location: New York

From: P. S. Bettoli
Location: South Bound Brook

Date December 14, 1979
cc: C. F. Bien - Wayne
L. Blecher - Wayne
L. J. Faneuf - NY
W. Fassuliotis - Wayne
G. R. Ferment - Whitehall
S. W. Kantor - Wayne

Subject: EPA PROPOSED RULE MAKING ON USE OF ASBESTOS FIBERS

I attended the special meeting called by the American Paper Institute to participate in their review of what action should be taken by this organization in response to the EPA proposed rules on asbestos and glass fiber use. Attached is a list of those attending.

The meeting was split into two sessions, glass fiber and asbestos, with some attending both. There appeared to be considerable concern about the statement that very low diameter fiber glass was an unacceptable alternate for asbestos (see proposed rule 60065, "Health Effects of Substitutes"). Johns-Manville and Owens Corning, as well as TIMA, were very upset about this and TIMA's consultant, Clifford Scheckler, and OCF's John Vyverberg read us a rough draft that had been prepared for the TIMA response. The gist of their position is that studies of workers occupationally exposed to fibrous glass dust for up to 35 years have shown no evidence of pulmonary disease attributable to the glass fiber. Their second point was that the EPA does not have any legal authority to include a regulation against the use of any glass fiber as a part of a specific rule governing the use of asbestos. The two studies mentioned by EPA as their reason for questioning low diameter fiber were performed by a method that could not be related to occupational exposure, and the author specifically cautions against directly extrapolating his results to man.

We were provided with a pamphlet, "Current Status of Health Aspects of Fibrous Glass and Other Man-Made Mineral Fiber," Medical Series Bulletin 20-79, Third Revision, Industrial Health Foundation, 5231 Centre Avenue, Pittsburgh, PA 15232. A copy of the abstract is attached. We also received copies of a pamphlet issued by TIMA, "Health Aspects of Fibrous Glass." TIMA currently has underway a $4 MM research program which is sponsoring studies at U. of Pittsburgh (statistics on workers), Los Alamos (animal studies) and Brookhaven National Labs (mechanism for glass fiber dissipation from the lung).

OCF claims that glass fiber, unlike asbestos fiber, is dissipated from the lung regardless of size. At the present time, only J-M manufactures "microfiber," which is less than 1.5 microns in diameter. I was surprised to learn that three or four of the paper companies represented were using this type fiber with cellulose to produce high quality filter papers. It was acknowledged that all gas attenuated glass or wool refractory fibers contain a small proportion of sub-micron diameter filaments. An epidemiological study of 15,000 employees

[illegible] mineral wool, 2.3 [illegible] at 19 plants, [illegible] in progress. To date, [illegible] have been examined [illegible] their health statistics [illegible] the same as the general population, according to NCI.

The Consumer Products Safety Commission did not include any reference to glass fiber in their comparable proposed regulation. It was reported that EPA was aware of a letter sent to OSHA by NIOSH that states there is no evidence of a health hazard from glass or refractory fibers. This is one reason why the glass industry is so disturbed by the EPA's tactics to involve them in an asbestos regulation. As now written, the burden falls on the fiber producer to prove his product is a "safe" alternate, even though the EPA can produce no evidence it is hazardous to man. It was recommended that the companies issue separate responses to the glass and asbestos petitions. We will be sent information to use for our individual action if we desire to take any.

The meeting on asbestos paper was far less organized. The API does not have members that produce papers for the construction industry. Any group response, therefore, will be limited to jointer-mill gasketing paper and specialty papers. It was pointed out that two large gasket paper manufacturers, Nicolet and Armstrong, were not represented. The API said they would contact them.

API's main concern was how they should respond to a letter received from the Research Triangle Institute which asks for considerable information concerning the production and use of asbestos (see attached). API questions that they could furnish the information, even if it were submitted to them by the individual companies for compilation, because of the highly proprietary nature of the data. The number of producers participating is relatively small and competitors might be able to gain confidential information even from the consolidated figures. It was decided to reconvene on January 17 to establish whether any group response via API should be made. In the meantime, they will ask EPA how they will preserve confidentiality.

It is apparent to all that the companies should first be assured by EPA that the information submitted voluntarily will be treated as proprietary. It is believed, however, that this may not be entirely effective because other government agencies can acquire the data from the EPA and their case could be open for inspection. Would you please advise me if GAF would be willing to divulge to API any of the information requested by the Research Triangle Institute.

P. S. Bettoli

P. S. Bettoli

PSB/cc
Attachments

PROPOSED COMPANY ATTENDANCE AT
SPECIAL MEETING CONCERNING
ASBESTOS FIBERS AND FIBROUS GLASS
API BOARD ROOM - 10TH FLOOR
NEW YORK CITY
DECEMBER 12, 1979 - 10:00 A.M.

David Carleton
American Paper Institute
260 Madison Avenue
New York, New York 10016

Nina Plaia
American Paper Institute
260 Madison Avenue
New York, New York 10016

John Festa
American Paper Institute
1619 Massachusetts Avenue, NW
Washington, D. C. 20036

Benjamin Sullivan (Fred Crane
Crane & Company, Inc.
South and Main Streets + Zeb Pierce)
Dalton, MA 01226

Roland Bernier
Dexter Corporation
C. H. Dexter Division
1 Elm Street
Windsor Locks, Ct. 06096

Counsel to API
Dunnington, Bartholow & Miller
161 East 42nd Street
New York, New York 10017

M. G. Thomas
Fiber Process
P. O. Box 1713
Chestnut Hill Road
Rochester, N. H. 03867

Philip Bettoli
GAF
114 Canal Road
South Bound Brook, N. J. 08880

Timothy C. Saylor
Hammermill Papers Group
P. O. Box 1440
Erie, Pa. 16533

Paul Walker
Hollingsworth & Vose Company
112 Washington Street
East Walpole, MA 02032

John H. Lonquist
Johns-Manville Corporation
1025 Connecticut Avenue, NW
Suite 214
Washington, D. C. 20036

Larry E. Carlson
Latex Fiber Industries
Beaver Falls, New York 13305

Robert F. Dressler (Chr. attended)
Manning Paper Company
P. O. Box 328
Troy, N. Y. 12181

Sy Gellman
NCASI
260 Madison Avenue
New York, New York 10016

Ray Pfleger
NCASI
260 Madison Avenue
New York, New York 10016

John Vyverberg
Owens-Corning Fiberglas
717 5th Avenue
New York, New York 10022

Frank L. Wardley
Quin-T Corporation
P. O. Box 308
Tilton, N. H. 03276

Douglas Meaker
Riegel Products Corporation
Delaware Avenue
Milford, N. J. 08848

Clifford L. Sheckler
TIMA Consultant
838 S. Drive
Metedeconk
Brick Town, N. J. 08723

The fibrous glass manufacturers have been interested in the health aspects of fibrous glass manufacturing and use for over 35 years. As a result they have participated in and sponsored extensive human and animal research studies related to fibrous glass and other man-made mineral fiber. They are presently continuing research work.

Well controlled animal inhalation studies have demonstrated no serious chronic adverse health effects, even with massive exposures to highly respirable glass fibers over the normal life span of the animals.

Pleural implantations, intraperitoneal injections and intrapleural injections of fine diameter glass fibers into animals have produced tumor development by these artificial means. The results of these animal studies, while establishing sufficient reason to investigate further the health effects of fibrous glass, especially with regard to lengths and diameters of the fiber, should not be directly extrapolated to man since the route of exposure, dosage, factors of inherent resistance and many other circumstances, prohibit this transfer.

Human studies of fibrous glass workers, occupationally exposed to fibrous glass dust for up to 35 years, have shown no pattern of chronic pulmonary disease diagnosable by x-ray or impaired pulmonary function, no increased incidence of pleural reactions, and no evidence of pleural malignancies attributable to fibrous glass exposure. The only demonstrated biologic effects in man are those of transitory mechanical irritation of the skin and, infrequently, of upper respiratory tract irritation.

All of the medical research reported to date, has indicated no significant chronic health effects in man as a result of exposure to fibrous glass.

Environmental studies of worker exposures have shown that airborne fibrous glass concentrations in ordinary fibrous glass manufacturing and fabrication operations are minimal.

Environmental studies carried out in fabrication operations, utilizing the highly specialized, extremely fine fibrous glass which constitutes less than 1% of all fibrous glass production, have evidenced higher airborne concentrations of glass fibers than found in ordinary fibrous glass operations described above.