

FILE NAME: Drywall Spackling Compounds (DWSC)

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460
August 19, 1977

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Aug 24 1 22 PM '77
OFFICE OF
GENERAL COUNSEL
SAFETY COMMISSION

Secretary
Consumer Products Safety Commission
Washington, D.C. 20207

Re: August 15, 1977, Public Hearing on Proposed Ban of
Patching Compounds and Artificial Emberizing Materials

Dear Sir:

This will confirm the oral statement I presented at the
August 15, 1977, CPSC Hearing on patching compounds and
artificial emberizing materials.

In 1973, EPA identified asbestos as a hazardous air
pollutant under the Clean Air Act (April 6, 1973, 38 FR 8820).
Since then, EPA has evidenced concern for low-level or
short-term exposures to asbestos in addition to high-level
or long-term exposures to this substance. For example, in
the preamble to amendments promulgated on October 14, 1975,
at 40 FR 48295, it was noted that there is "new biological
evidence supporting the significance of single short-term
exposures to asbestos."

The nature of asbestos is such that there are no known
safe levels of exposure. In short, EPA is concerned that
low-level or short-term exposures may be just as harmful
to public health as high-level or long-term exposures.

Sincerely,

Ron Naveen

Ron Naveen, Attorney
Air, Noise, and Solid Waste
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