FILE NAME: Garlock (GAR)

DATE: 1972 Mar 13

DOC#: GAR011

DOCUMENT DESCRIPTION: Testimony to Dept of Labor

Presentation on Proposed Standard for Exposure to Asbestos Dust on behalf of the Asbestos Textile Institute and its member companies.

March 13, 1972

Mr. Arthur M. Goldberg
Hearing Examiner
U. S. Department of Labor
Office of the Under Secretary
Washington, D. C. 20210

Re: Hearing on Proposed Standard
For Exposure To Asbestos Dust
Beginning on March 14, 1972

Dear Mr. Goldberg:

My name is Alex Kuzmuk. I am a member of the Board of Governors of the Asbestos Textile Institute.

I am here today to officially represent and state the position of the Asbestos Textile Institute and its member companies. We are in opposition to the proposed asbestos dust standards as published in the FEDERAL REGISTER, January 12, 1972. We are also opposed to recommendations proposed in the NIOSH criteria package, and by the Asbestos Advisory Committee.

The asbestos textile industry, which this association represents, includes over 4000 job opportunities in manufacturing, plus approximately 35,000 job opportunities in related product fabrication and sales. The gross business volume for manufacturing alone is over $80 million per year. The gross volume for related fabrication and sales is, therefore, many times this amount. Although this is not the largest segment of the asbestos industry, it is a very important one. Our product lines include the manu-

facture of safety garments, insulations, clutch facings, brake linings, paper dryer felts, mechanical packings and gaskets, laminated plastics, and many other commodities essential to today's technological progress. In many instances, there are no known substitutes for asbestos textile materials.

Subsequent to the enactment of the Occupational Safety and Health Act, the threshold limit value for asbestos dust was reduced from 5 million particles per cubic foot of air to 12 fibres per milliliter, 5 microns or greater in length. We, in the asbestos textile industry, made every possible effort to meet the 12 fibre threshold limit value by re-engineering dust hoods and dust collection equipment on cards, spinners, looms, and many other types of equipment. In addition, many of us initiated wet weaving and made extensive additional changes in processes and materials. When the further reduction to the threshold limit value for asbestos dust was published on December 7, 1971, we began all over again to study plans for revising equipment, processes, and materials, for which we had just spent thousands of dollars to install to meet the 12 fibre level. Many of us have not, and cannot, reduce our dust levels to the emergency and proposed 5 fibre threshold limit value.

If engineering to a 5 fibre level were feasible on the complex types of machinery and equipment used in the textile industry, the cost of implementation would make it extremely doubtful that this industry could survive economically. We are presently being pressed to the wall by our competitors. The cost of a

program to meet the proposed asbestos dust standards could be the determining factor for removing American-made asbestos textiles from the market place.

The competition to which I refer will not be required to make extensive capital investments to change processes, provide protective clothing, provide medical examinations, and monitoring. This competition is primarily from foreign imports. I, therefore, take this opportunity to ask this Federal agency whether it will take the responsibility of recommending equitable tariffs to prevent this economic disaster, if the proposed Asbestos Dust Standards become effective.

Beyond the proposed asbestos dust standards published in the January 12, 1972 FEDERAL REGISTER, there are recommendations by the National Institute of Occupational Safety and Health, and the Asbestos Advisory Committee. These recommend further reduction of the asbestos dust threshold limit value to 2 fibres per milliliter, plus many additional requirements concerning respirator equipment, protective clothing, monitoring, and others.

With the problems we are encountering in attempting to reach the present Emergency Asbestos Standard, it is unrealistic to even consider the feasibility of a 2 fibre standard. I would like to point out that Mr. Clifford L. Sheckler, Chairman of the Asbestos Textile Institute Environmental Health Committee, took the initiative in 1964 to request Dr. Lewis Cralley of the

United States Public Health Service to conduct an epidemiological study of our asbestos textile industry. We recognized then that a potential health problem existed and, therefore, we wanted expert advice and assistance to help us solve it. We have neither received the advice nor the assistance which we had hoped for.

We opened our plants to the United States Public Health Service personnel for environmental studies, review of our records, and physical examinations of our people. Our member companies urged employee participation in the study, and a substantial representative group of workers were involved. We continually requested the United States Public Health Service to increase their efforts and provide interim progress reports.

The Public Health Service Asbestos Study of which I speak has not been completed. A recent report, which is a primary factor in the recommendations by NIOSH and the Advisory Committee, was based on this incomplete study. The information provided in the report was based on opinion and speculation, rather than fact. Had the United States Public Health Service Asbestos Epidemiological Study been completed as continually requested by the Asbestos Textile Institute, we might now be in a position of having factual information as to what the safe threshold limit for asbestos dust really should be.

One factor is pertinent to this point. The asbestos related

disease involvement in the asbestos textile industry is being related to asbestos dust exposure levels as they presently exist rather than at the time the disease was incurred 25-30 years ago. Such a comparison is invalid. All of the past monitoring for asbestos dust in American textile plants has been done using the impinger method for sampling. Today's proposed standards are based on a fibre level using the Milapore filter method for sampling. There is no accurate correlation of impinger counts versus Milapore filter counts established to date. There has been some work done by the United States Public Health Service, but the results are incomplete. This is but one area that demonstrates the need for further health research studies and evaluations before unnecessarily creating an unrealistic standard that can be the demise of this industry and its related job opportunities.

We respectfully urge the Secretary of Labor to: (1) Reconsider the establishment of asbestos standards; (2) reinstate the threshold limit value for asbestos dust at 12 fibres per milliliter, 5 microns or greater in length for an interim period pending a comprehensive epidemiological study of the entire asbestos industry in the United States. I would like to point out that many comparisons have been made between the British and United States asbestos textile industry concerning health problems. The vast differences in materials, equipment and processes make such comparisons unrealistic. (3) Provide for representation of the Asbestos Textile Institute on future advisory and study

committees.

I would also like to point out that while many detailed requirements are included in the proposed standard, it is absolutely mute on the very important medically substantiated problem of cigarette smoking as associated with exposure to asbestos fibre.

We, of the Asbestos Textile Industry, have the greatest desire to prevent injury to our employees. We believe this can be accomplished without destroying the asbestos textile industry.

Thank you for the privilege of appearing at this hearing today.

Very truly yours,

Alex Kuzmuk
Treasurer and
Member of Board of Governors
for the
Asbestos Textile Institute

ak:jc