KAISER GYPSUM COMPANY, INC.

INTER-OFFICE MEMORANDUM

TO	G. B. Kirk	DATE	24 February 1972
AT	KC 1145		
COPIES TO	J. W. Blewett H. C. Dupuis A. F. Raffaelli T. V. Smith ✓	FROM AT	J. S. Sheahan Antioch
	H. L. Weightman		

SUBJECT AIRBORNE POLLUTANTS, ESPECIALLY ASBESTOS PL 4.1.0

The Environmental Protection Agency has been directed by Congress to establish national standards for certain airborne pollutants. EPA proposed such standards for asbestos, mercury and beryllium on December 7, 1971, and has 180 days to hold public hearings and set final emission standards, unless information presented at the public hearings demonstrates clearly that the pollutants are not hazardous. I attended the last of the three public hearings on February 15-16 in Los Angeles. A package of regulations, background information, etc., is attached to Mr. Kirk's copy for circulation to other interested persons. The hearing record will be open until March 3 for additional written statements.

The proposed standards for mercury and beryllium will not affect us. That for asbestos would affect us in two ways:

a. Through strict control or elimination of emissions of asbestos during manufacturing and fabrication of products containing asbestos (i.e., most of our accessory products).

b. By prohibiting the spraying of any asbestos-containing product on any portion of a building or structure (e.g. K-Spray and wall texture).

The hearing brought out that this prohibition was clearly intended to apply to spray application of asbestos fireproofing and insulation, but that its broad terms include spray applications which the EPA was unaware of but did not necessarily mean to ban.

For instance, favorable response was given to a presentation by a cement manufacturers' and users' committee. They asked that the use of 0.4% asbestos in gun-applied portland cement be allowed on the grounds that the product is slurried before spraying, is applied through a small orifice, and encapsulates the asbestos in the applied product so there is little chance of asbestos fibers being introduced into the air. Similar favorable response was given to appeals for allowing the use of spray-applied asphalt and asbestos roofing mixture on like grounds. W. R. Grace & Company gave a good, well-received, presentation showing the difference between their plaster fireproofing (Monokote) containing 12% of slurried andbonded asbestos and the non-plaster, high asbestos sprayed fireproofings; they had data showing the low level of asbestos fibers emitted.

LIMPET

RECOMMENDATION

It is recommended that a statement be entered to EPA, prior to March 3, describing our spray texture material, referring to the items in the above paragraph, and asking that it be regulated in the same manner as EPA decides to regulate these other slurried, bonded materials. This will have to be done by our own industry, as the asbestos industry representatives apparently did not feel that use worth emphasizing. The easing of the regulation for slurried bonded materials, if allowed, will be quite specific, and we cannot rely on the scope for the other uses being broad enough to cover our materials also.

OTHER HIGHLIGHTS OF THE HEARING

1. The EPA people repeatedly voiced their intent to write regulations which would protect not only the healthy industrial worker but the aged, invalids, infants, etc., at locations remote from a pollutant producing factory. With asbestos, they were concerned with what happens during demolition of structures to which asbestos materials were applied. Also, with exposure of persons to products without having any idea of what the ingredients are.

2. Asbestos impurities in talc were cited as possible sources of asbestos in lungs of persons with no known history of asbestos exposure. (NOTE: Our use and control of talc used on back of board as well as in accessory products should be reviewed). Asbestos from brake linings is apparently absolved because the heat of braking changes the fibers to crystals. Electric razor whiskers, glass fibers and aluminum trihydrate were mentioned as causing bodies in the lungs similar to those from asbestos. Only the electron microscope can distinguish the different irritating materials.

OTHER HIGHLIGHTS (cont.)

3. Filter cloths used in baghouses do not meet the permeability standards cited in the regulations until coated with a layer of fibers. It was suggested that bags not be fully shaken down.

4. The asbestos industry dwelled mostly on their inability to confine the dust from mine tailings dumps, etc., to meet the standards and on the fact that visible emissions from asbestos manufacturing or fabricating operations (which would be banned) do not necessarily contain asbestos.

5. Zimmerman of National Gypsum appeared as a spokesman for the asbestos association. He did not object to any prohibition on spraying of asbestos products except for roofing spray compounds. He did not mention texturing compound uses, and I was not able to talk to him to find out if this was deliberate.

6. A Dr. Weill of Tulane U., speaking for the asbestos industry, minimized the asbestos hazard to the general public. He was contradicted by other doctors working in air pollution.

7. Williams of W. R. Grace says that substitutes for asbestos, some of which it manufactures, do not bond to steel as well as asbestos in fireproofing plasters and do not give an equivalent degree of protection in UL fire tests. He noted that the standard, as written, could even ban materials having minor asbestos impurities, and suggested that the standard refer to "commercial asbestos". Grace will try to develop some data on emission of asbestos during demolition of a fireproofed structure.

8. The possible emission of asbestos during sanding of joint compounds was not mentioned, probably because of ignorance of that operation. One doctor did cite a hazard from sanding of asbestos floor tiles.

9. The Los Angeles Air Pollution Control District criticized the EPA methods of asbestos measurement as too sophisticated and complicated; it recommends an easier method. They also want restrictions on trucks hauling asbestos products, citing possibility of broken bags, and on the disposal of used bags, etc. They mentioned the accumulation of asbestos on the clean air side of baghouse bags, and say that after repair the permeability of filter bags is often too high.

OTHER HIGHLIGHTS (cont.)

10. The EPA does not believe the asbestos standards established by the Department of Labor on December 7, 1971, are good enough.

11. The mercury involved in this hearing is inorganic mercury vapor from chlor-alkali plants. There was much conflicting testimony as to the possible hazards, with industry representatives able to cite data showing no problem during years of exposure by their workers (with due precautions). This does not involve such things as mercury fungicides. Beryllium controls are on manufacturing plants and foundries. These items do not concern us.

12. Geo-Met, Inc. has developed an instrument which can analyze the level of mercury vapor much more rapidly than normal. With it, they monitored the level of mercury vapor in the air in a room after the application of latex paint. Indoor concentration was approximately 1000 times the outdoor ambient, and the level remained high for at least a week.

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