



INTERNAL CORRESPONDENCE

METALS DIVISION

• P.O. BOX 579 - 4625 ROYAL AVE., NIAGARA FALLS, NEW YORK 14300

To (Name) Messrs. T. W. Carmody - NYO
 Division R. F. X. Fusaro - NYO
 Location J. L. Myers - Niagara
 H. C. Thurber - NYO

Date March 6, 1978
 Originating Dept. "Calidria" Asbestos
 Answering letter date

Copy to File

Subject AIA/NA Response to OSHA
 Generic Standard Proposal

A copy of the above-noted response is included for your information. The principal objective was to keep the door open for AIA/NA participation in the hearings. We also wanted to stress the non-fixed places of employment question. The "recycle" objection was mainly to get this question into the record.

I am listed as the speaker with the understanding that there is no problem to change this should it become appropriate. Obviously, any statement made in the name of the AIA/NA will be given proper prior review by Union Carbide.

The endorsement of the AIHC proposal was not included. There was a feeling that the Asbestos Industry should keep a low profile for the present in this rulemaking and a problem with the lack of a detailed critique of the Model Standards. It is our intent to endorse at the hearings if the members are in agreement.

H. B. Rhodes
 Harrison B. Rhodes

HBR/rmm
 Attachment

RECEIVED

MAR - 9 1978



ASBESTOS INFORMATION ASSOCIATION

1745 Jefferson Davis Highway, Crystal Square 4, Suite 509
Arlington, Virginia 22202 • (703) 979-1150

25 February 1978

OSHA Office of Consumer Affairs
Room N 3633
U.S. Department of Labor
Third Street and Constitution Avenue, N.W.
Washington, D.C. 20210

Gentlemen:

The Asbestos Information Association/North America requests the opportunity to make a verbal presentation of not more than fifteen minutes at the OSHA hearing on the proposed rulemaking for identification, classification, and regulation of toxic substances posing a potential occupational carcinogenic risk. Harrison B. Rhodes, Dr. Engineering Sciences, Chairman, AIA/NA Standards Advisory Committee, will speak for the Association. (Technology Manager, Union Carbide Corporation, P.O. Box 579, Phone: 716/278-3375.) Dr. Rhodes' comments will concern:

1. The need for special consideration of the construction industry and other industries characterized by non-fixed places of employment.
2. The relationship of the proposed generic standard to the current and proposed asbestos standard.

The Need for Special Consideration for Non-Fixed Places of Employment

OSHA has heretofore recognized that there are conditions present in a construction environment, and not present in a manufacturing environment, which warrant special attention. OSHA's October 9, 1975 Notice of Proposed Rulemaking-Occupational Exposure to Asbestos, OSHA stated:

"The standard, as revised, would continue to apply to all workplaces where occupational exposure to asbestos is present, but would exclude the construction industry.

It is OSHA's intention to develop and propose a separate revision to the existing asbestos standard for the construction industry. In addition, the uniqueness of the construction industry itself (viz., the multiplicity of non-fixed workplaces, and the utilization of highly transient work

forces) strongly suggests separate treatment...Although OSHA believes that health hazards faced by employees in the construction industry with regard to occupational exposure to asbestos are similar to those faced by their counterparts in other covered employments, OSHA recognizes that alternative administrative and engineering controls may be more appropriate and feasible for the construction industry."

The separation of manufacturing and construction standards as proposed for asbestos should be adopted by OSHA for all appropriate toxic substances posing a carcinogenic risk. The unique factors present in a construction environment and in other non-fixed workplaces where asbestos-containing products are utilized are likely to be present in construction environments where products containing other toxic substances are used. These factors which are not present in a manufacturing environment warrant special attention, including, but perhaps not limited to, a modified approach to compliance. The three model standards should not apply to the construction industry or to similar industries characterized by non-fixed workplaces.

The Relationship of the Proposed Generic Standard to the Current and Proposed Asbestos Standard

The OSHA standard for occupational exposure to asbestos was the first health standard promulgated under the Occupational Safety and Health Act. This standard evolved through an emergency temporary standard published in December 1971, followed by a permanent standard in June 1972.

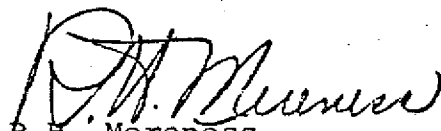
In October 1975, a proposed revision of the standard was issued. Subsequently hearings were held before the Construction Industry Advisory Committee to consider an appropriate standard for the construction industry. OSHA officials have stated that there is no intention to apply the October 4, 1977 generic carcinogen proposal to those standards already promulgated or to those currently in the rulemaking process. Such policy makes sense. It would not be sensible to recycle the asbestos standard through the generic standard procedures starting with a new emer-

Pg....3

gency temporary standard. It would be unreasonable to discard a standard adapted to a particular industry after several years of study and review for a new approach designed for broad standards setting. It is recommended that OSHA specify in the final promulgated generic carcinogen standard that those substances now regulated by approved standards or currently in the rulemaking process be exempt from procedures under the proposed generic standard.

Several provisions set forth in the model standards are questioned as to best available scientific evidence. In this regard, attention is invited to AIA/NA's April 1976 response on the proposed revision to the asbestos standard which is submitted as part of the record. Many of the provisions proposed by AIA/NA for asbestos are relevant to the model standards and are recommended for consideration to be included therein.

Yours truly,


R.H. Mereness
Executive Director

RHM/sm

Enclosure

VI. 8. 76

cc: M. Swetonic AIA

STATE OF NEW YORK
DEPARTMENT OF ENVIRONMENTAL CONSERVATION

Subchapter A
Prevention and Control of Air Contamination and Air Pollution

PART 196
Asbestos-Containing Surface Coating Materials
(Statutory authority: Environmental Conservation Law, Sections 14 and 15)

Sec.

- 196.1 Applicability
- 196.2 Prohibition

Section 196.1 Applicability. This Part shall apply throughout the State of New York.

Section 196.2 Prohibition. No person shall engage in or allow surface coating by the spraying of asbestos or asbestos-containing materials.

EXPLANATION OF PROPOSED PART 196
ASBESTOS-CONTAINING SURFACE COATING MATERIALS

The spraying of asbestos-containing materials may cause detrimental effects to the safety, health, welfare, and comfort of the public. Experience in industry clearly indicates that inhalation of asbestos may cause serious disease, and that some asbestos related diseases may be found after exposure to relatively low levels of asbestos.

Alternatives to asbestos spraying include:

- 1.) The continued use of present spray-on technique using substitute materials for asbestos.
- 2.) The use of other application methods.

Enacted late 1971.

STATE OF NEW YORK
DEPARTMENT OF LABOR



BOARD OF STANDARDS AND APPEALS

11 NORTH PEARL STREET
ALBANY, N. Y. 12207

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WILLIAM E. ADAMS
GENERAL COUNSEL

GAYLORD W. HYMEN
EXECUTIVE SECRETARY

March 5, 1974

Mr. R. H. Mareness
Executive Director
Asbestos Information Association
1660 L Street, NW
Washington, D.C. 20036

Re: Proposed Amendment to Industrial Code
Rule No. 12, Control of Dangerous Air
Contaminants

Dear Mr. Mareness:

This will acknowledge receipt of your letter dated February 22, 1974 in which you state the position of the Asbestos Association on the asbestos threshold limit delineated in the Board's recent proposed code rule amendment.

New York State's approach to determining threshold limit values is not specifically delineated in the standard. As you can observe by study of Code Rule 12, we have not included all of the standard explanatory language found in the ACGIH publication. However, Section 12-3.1 indicates that an opinion by a physician representing the Industrial Commissioner is necessary when dealing with concentrations of air contaminants other than those listed in the standard. Subsequently, after discussions with physicians in the Department of Labor's Division of Industrial Hygiene, it appears that a determination concerning a situation involving possible asbestos level violations would not be made on the basis of a single sample.

It is my understanding that sampling will be conducted over a shorter period, for instance, two hours, and probably twice during a working shift as opposed to a straight eight hour test. According to my information, this method is an accepted one in the field of industrial hygiene when dealing with certain measurement methods. It would appear, therefore, that the approach to asbestos measurements by the Labor Department is in line with the recommendations made by your Association.

If you have any further questions concerning the details of the testing procedure, I would recommend that you contact Dr. Jacqueline Messite, Administrator, Occupational Health Analysis, Department of Labor, 80 Centre Street, New York, New York 10013.

Very truly yours,

A handwritten signature in cursive script that reads "Harry R. Mason".

HARRY R. MASON
Chairman

HRM:bas
cc: Dr. Messite

UCC 009091

copies to - P. W. McDaniel

J. L. Myers/H. B. Rhodes

P. J. Morgan

J. W. Rawlings

STATE OF NEW YORK

DEPARTMENT OF LABOR



BOARD OF STANDARDS AND APPEALS

11 NORTH PEARL STREET
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GENERAL COUNSEL

GAYLORD W. HYMEN
EXECUTIVE SECRETARY

February 19, 1974

Mr. W. C. Thurber
Product Manager- Asbestos
Union Carbide Corporation
Mining and Metals Division
270 Park Avenue
New York, New York 10017

Dear Mr. Thurber:

This will acknowledge receipt of your letter dated February 14, 1974, in which you stated your endorsement of the proposed amendment of Industrial Code Rule No. 12.

Thank you for your interest in New York State's occupational safety and health program.

Very truly yours,

Harry R. Mason
HARRY R. MASON (b)1
Chairman

HRM:bas

RECEIVED
FEB 20 1974

UCC 009092



February 14, 1974

Board of Standards and Appeals
Department of Labor
State of New York
11 North Pearl Street
Albany, New York 12207

Attention: Mr. Harry R. Mason, Chairman

Subject: Proposed Partial Amendment of Industrial Code Part (Rule No.) 12 (12NYCRR 12)

Gentlemen:

Reference is made to your letter of January 10, 1974, requesting discussion on the subject amendment. Union Carbide Corporation endorses the proposed change to measurement of asbestos air contaminants from the present 5 million particles per cubic foot to a permissible level of 5 fibers per cubic centimeter.

Such a change is in keeping with current Federal Regulations and with generally accepted practice in the industrial hygiene community.

Very truly yours,

W. C. Thurber
Product Manager - Asbestos

WCT:es

bcc: Messrs. P. W. McDaniel
J. L. Myers/H. B. Rhodes
P. J. Morgan
J. W. Rawlings



INTERNAL CORRESPONDENCE

(202) 223-4885

MINING AND METALS DIVISION

P. O. BOX 579, NIAGARA FALLS, NEW YORK 14302

To (Name) Mr. W. C. Thurber
 Division UCC Mining and Metals
 Location 38th Floor
 270 Park Avenue
 New York, NY 10017

Date February 8, 1974
 Originating Dept. "Calidria" Asbestos
 Answering letter date

Copy to Messrs. P. J. Morgan
 J. L. Myers
 File

Subject New York State Asbestos
 Regulations

Dear Bill:

A copy of the proposed change in the above noted regulations is attached. As far as I can see, the only thing done is to change the allowable level for asbestos from 5 MPPCF to 5 fibers per cc. greater than 5 micrometers. No distinction is made between TWA and Ceiling concentrations. The public hearing was on January 29 but written comments will be accepted until February 15.

It seems to me that this is a very realistic approach and should receive strong support from the industry. I have no idea what kind of effort is being made by the Selikoff group, etc. but suspect they may be lobbying strongly to lower it.

My recommendation is that you contact Bob Mereness to see what the industry plans to do. We may also want to file a UCC note separately.

Regards,

H. B. Rhodes

HBR:cjb
 Attachment

RECEIVED

FEB 11 1974

Note → FROM EXISTING CODE RULE 12

TABLE II—MINERAL DUSTS

<i>Substance</i>	<i>Million Particles Per Cubic Foot*</i>
Asbestos	5
Dust (nuisance, no free silica)	50
Graphite (natural)	15
Mica (below 1% free silica)	20
Portland cement	50
Silica —	
Class I**	50
Class II**	20
Class III**	10
Class IV**	5
Slate (below 1% free silica)	50
Soapstone (below 1% free silica)	20
Talc (below 1% free silica)	20
Tremolite	5
Total dust (below 1% free silica)	50

* Using the light field low-power method of counting as described in the U.S. Public Health Report 47 No. 12, March 12, 1932, pp. 669-672 or its equivalent and a standard type impinger or other equivalent instrument for taking atmospheric dust samples.

** *Class I Rock.* Any rock formation uniformly containing up to and including 5%, by weight, of free silicon dioxide.

** *Class II Rock.* Any rock formation uniformly containing more than 5%, up to and including 10%, by weight, of free silicon dioxide.

** *Class III Rock.* Any rock formation uniformly containing more than 10%, up to and including 40%, by weight, of free silicon dioxide.

** *Class IV Rock.* Any rock formation containing more than 40%, by weight, of free silicon dioxide.

STATE OF NEW YORK
DEPARTMENT OF LABOR



BOARD OF STANDARDS AND APPEALS

11 NORTH PEARL STREET
ALBANY, N. Y. 12207

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RICHARD H. BOLTON

WILLIAM E. ADAMS
GENERAL COUNSEL

GAYLORD W. HYMEN
EXECUTIVE SECRETARY

January 10, 1974

Dear Sir:

Attached herewith is a copy of Public Hearing Draft No. 1, dated December 19, 1973, of a proposed partial amendment of Industrial Code Part (Rule No.) 12 (12 NYCRR 12) relating to Control of Air Contaminants.

A public hearing at which the proposed partial amendment will be discussed will be held at the following time and place:

Tuesday, January 29, 1974 at 10:00 A.M.

Home Savings Bank Building - Room 1902
11 North Pearl Street
Albany, New York 12207

Comments at the public hearing will be limited to the provisions contained in Public Hearing Draft No. 1, dated December 19, 1973, of the proposed partial amendment of Industrial Code Part (Rule No.) 12.

We invite your presence at the public hearing to express your opinions concerning the proposed amendment.

If it is inconvenient for you to attend the scheduled hearing, please send your written comments concerning the proposed amendment to the Board at the above address on or before February 15, 1974. All written comments received by the Board, along with those made at the public hearing, will be carefully considered before final action is taken on the proposed partial amendment of Industrial Code Part (Rule No.) 12.

Very truly yours,

A handwritten signature in cursive script that reads "Harry R. Mason".

Harry R. Mason
Chairman

PROPOSED PARTIAL AMENDMENT

of

Title 12 of the New York State Official Compilation of Codes,
Rules and Regulations, Chapter I, Subchapter A, Part 12

(12 NYCRR 12)

INDUSTRIAL CODE PART (RULE NO.) 12

relating to

CONTROL OF AIR CONTAMINANTS

Written comments accepted until February 15, 1974

STATE OF NEW YORK
DEPARTMENT OF LABOR
BOARD OF STANDARDS AND APPEALS
11 North Pearl Street, Albany, New York 12207

Harry R. Mason, Chairman
B. Franklin Spencer, Member
Richard H. Bolton, Member

The Industrial Code of the State of New York
Proposed Partial Amendment of Part (Rule No) 12

relating to

CONTROL OF AIR CONTAMINANTS

(Statutory Authority: Labor Law §§ 27-a, 28, 29, 200, 299)

Title 12 of the New York State Official Compilation of Codes,
Rules and Regulations, Chapter I, Subchapter A, Part 12

The said Part (rule) as last amended effective May 1, 1971 is proposed to be
partially amended in respect to Subpart 12-3 to read as follows:

Editorial Note: Delete present Table II - Mineral Dusts
and insert new Table II as follows:

TABLE II - MINERAL DUSTS
AND FIBERS*

Substance	Million Particles Per Cubic Foot**	Permissible Number of Fibers Per Cubic Centimeter of Air***
Asbestos ⁺		5
Dust (nuisance, no free silica)	50	
Graphite (natural)	15	
Mica (below 1% free silica)	20	
Portland cement	50	
Silica ⁺⁺ -		
Class I	50	
Class II	20	
Class III	10	
Class IV	5	
Slate (below 1% free silica)	50	
Soapstone (below 1% free silica)	20	
Talc (below 1% free silica)	20	
Total dust (below 1% free silica)	50	

1 * Fibers longer than five micrometers.

2 ** Using the light field low-power method of counting as described in the U.S.
3 Public Health Report 47 No. 12, March 12, 1932, pp 669-672 or its equivalent
4 and a standard type impinger or other equivalent instrument for taking
5 atmospheric dust samples.

6 *** All determinations of airborne concentrations of asbestos fibers shall be
7 made by the membrane filter method at 400 - 500 x (magnification) (4 milli-
8 meter objective) with phase contrast illumination.

9 + For the purposes of this Part (rule), asbestos fibers includes the following:
10 Actinolite, Amosite, Anthophyllite, Chrysotile, Crocidolite and Tremolite.

11 ++ Class I Rock - Any rock formation uniformly containing up to and including
12 5%, by weight, of free silicon dioxide.

13 Class II Rock - Any rock formation uniformly containing more than 5%, up to
14 and including 10%, by weight, of free silicon dioxide.

15 Class III Rock - Any rock formation uniformly containing more than 10%, up to
16 and including 40%, by weight, of free silicon dioxide.

17 Class IV Rock - Any rock formation containing more than 40%, by weight, of free
18 silicon dioxide.

Keep Marenco A1A
11/7/73

From
R. A. CONNELL

46th Floor
Tel. 551-6335

Mr. H. C. Thibault
384

This is a proposed
New York City Council
bill

R. A. Connell
10/23

cc: Mr. R. J. Insure

RECEIVED
OCT 24 1973
WILLIAM S. THURMAN

BAN ASBESTOS FILTERS IN FOOD PREPARATION -- Mr. Biondolillo (Int. 1318) would ban the preparation, manufacture, processing or sale in New York City of any food or drink wherein asbestos filters are used in producing the final product.
Committee on Health and Education

AUTO RENTALS -- PROHIBIT SPECIAL RULES FOR YOUNG DRIVERS -- According to Mr. Mercor-
ella's bill (Int. 1324) auto rental agencies could not impose on persons under 25,
requirements other than those imposed on persons over 25, provided they agree to
pay the higher insurance rates for such rental.
Committee on Consumer Affairs

REWIRE BUILDINGS FOR AIR-CONDITIONERS -- Int. 1325 (Mr. Povman) would require land-
lords to rewire inadequately wired buildings, upon request of a majority of tenants,
in order to accommodate air-conditioners. Provision is made for landlord to recover
these capital costs by increasing rentals in accordance with applicable law.
Committee on Buildings

ADJUST RENTS WHERE IMPROVEMENTS PAID FOR -- Int. 1335 sponsored by Mrs. Ryan and
Mr. Golden would require landlords of rent controlled buildings to make an adjust-
ment in rent where improvements such as refrigerators, stoves and t.v. antennas
have been furnished and fully paid for by the tenant as part of a rent increase.
Committee on Housing

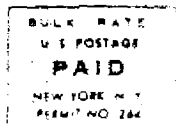
ZONING RULES AND SWIMMING POOLS -- A bill introduced by Mr. Troy (Int. 1340) pro-
vides that every bill of sale of a backyard swimming pool give notice that in erect-
ing the pool it will be necessary to conform to the Zoning Resolution which requires
the edge of the pool to be located not less than five feet from any lot line.
Committee on General Welfare

LICENSING BUILDING CONTRACTORS -- General building contractors would be required to
be licensed and conduct their activities in accordance with a comprehensive set of
regulations spelled out in Int. 1344 by Messrs. Katz and Gaeta.
Committee on Buildings

FOR FURTHER INFORMATION PHONE RE 2-5200 OR WRITE

MICHAEL PEARL
DIRECTOR, CITY GOVERNMENT

**NEW YORK CHAMBER
OF COMMERCE & INDUSTRY**
65 LIBERTY STREET • NEW YORK, N. Y., 10005



Mr. R.A. Connell
Union Carbide Corp.
270 Park Ave.
New York, N.Y. 10017

MUNICIPAL MEMO

UCC 009101



ASBESTOS INFORMATION ASSOCIATION

1600 L Street, N.W. Washington, D.C. 20036 (202) 223-1835

22 February 1974

Mr. Harry R. Mason, Chairman
Board of Standards and Appeals
Department of Labor
State of New York
11 North Pearl Street
Albany, New York 12207

Dear Mr. Mason:

This letter is written on behalf of the members of the Asbestos Information Association/North America which represents 22 companies and approximately three-quarters of the asbestos mining, milling, manufacturing, and importing firms in the United States.

It is our understanding a proposed partial amendment of Part (Rule No.) 12 relating to Control of Air Contaminants, Industrial Code of The State of New York, would serve to bring The Code in line with the present Federal Standard (OSHA) viz permissible exposure of employees in the workplace to asbestos fibers (actinolite, amosite, anthophyllite, chrysolite, crocidolite, and tremolite) to 5 fibers per cubic centimeter of air, fibers longer than 5 micrometer, and determining airborne concentration of asbestos fibers by use of the membrane filter method at 400 - 450 x (magnification) (4 millimeter objective) with phase contrast illumination.

We are somewhat concerned to note that the 5-fiber standard is not defined as an 8-hour Time Weighted Average (TWA), as it is in the Occupational Safety and Health Administration standard. As proposed, the New York State standard would be considered a "peak" or "ceiling" limit and, as such, would be one-half of the Federal peak standard of 10 fibers per cc.

Despite the nomenclature, 8-hour TWA's do not have to be measured over a full eight hours, although this is, of course, desirable in order to obtain the most accurate measurement of an employee's exposure to asbestos. Four,

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FEB 25 1974

UNION CARBIDE CORPORATION
270 PARK AVENUE, NEW YORK, N.Y. 10017
LAW DEPARTMENT

February 15, 1974

Mr. W. C. Thurber
Mining & Metals
38th Floor

Re: New York State Asbestos Regulations

Dear Mr. Thurber:

As I advised you by telephone yesterday, John Whittlesey, our labor counsel in the Law Department spoke to Irving Kingsley by telephone yesterday regarding this subject.

Mr. Kingsley is soon to become the Chief Industrial Hygiene Engineer. He said that unless the letter "c" appears next to the standard, the standard is a time-awaited average. In the case of asbestos, the standard is on a time-awaited average.

Very truly yours,



Patrick J. Morgan

PJM:rs

cc: Mr. R. F. X. Fusaro/File
Mr. J. W. Whittlesey

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FEB 19 1974

UCC 009103

UNION CARBIDE CORPORATION
270 PARK AVENUE, NEW YORK, N.Y. 10017
LAW DEPARTMENT

RECEIVED
JUN 29 1973
WM. C. THURBER

June 26, 1973

Mr. W. C. Thurber
Mining and Metals Division
38th Floor

Re: Mining and Metals -
Administration Code of
New York City - Asbestos

Dear Mr. Thurber:

Set forth below is the current New York City law concerning the emission of asbestos into the air.

"§ 1403.2-9.01 Emission of air contaminant (including odorous air contaminant) or water vapor; detriment to person, property or plant and animal life. - No person shall cause or permit the emission of air contaminant, including odorous air contaminant, or water vapor if the air contaminant or water vapor causes or may cause detriment to the health, safety, welfare or comfort of any person, or injury to plant and animal life, or causes or may cause damage to property or business, or if it reacts or is likely to react with any other air contaminant or natural air, or is induced to react by solar energy to produce a solid, liquid or gas or any combination thereof which causes or may cause detriment to the health, safety, welfare or comfort of any person, or injury to plant and animal life, or which causes or may cause damage to property or business.

(a) The prohibition of this section includes, but is not limited to, emission of the following air contaminant:

...

(2) Air contaminant containing asbestos, except where such an air contaminant is emitted from the brake lining of a motor vehicle during normal use."

Very truly yours,

Robert F. X. Fusaro
Robert F. X. Fusaro

RFXF/db

cc: J. L. Myers; H. B. Rhodes; P. J. Morgan/File

UCC 009104

UNION CARBIDE CORPORATION
270 PARK AVENUE, NEW YORK, N. Y. 10017
LAW DEPARTMENT

WJ
January 12, 1972 *done, info*

Mr. J. L. Myers
Mining & Metals Division
137 47th Street
P. O. Box 579
Niagara Falls, New York 14302

cc: Mr. J. W. Rawlings
Dr. H. B. Rhodes
Mr. P. L. Reiber
Mr. P. J. Morgan/File

Re: Asbestos - Prohibition of
Spraying in New York State

Dear Mr. Myers:

I enclose herewith the text of a recently enacted New York State regulation prohibiting any person from engaging in or allowing surface coating by the spraying of asbestos or asbestos-containing materials.

Very truly yours,

Gerald E. Grayson 5857

GEG:deb
Enc.

JAN 13 1972

STATE OF NEW YORK
DEPARTMENT OF ENVIRONMENTAL CONSERVATION

Subchapter A
Prevention and Control of Air Contamination and Air Pollution

PART 196
Asbestos-Containing Surface Coating Materials
(Statutory authority: Environmental Conservation Law, Sections 14 and 15)

Sec.

196.1 Applicability
196.2 Prohibition

Section 196.1 Applicability. This Part shall apply throughout the State of New York.

Section 196.2 Prohibition. No person shall engage in or allow surface coating by the spraying of asbestos or asbestos-containing materials.

The whole law

EXPLANATION OF PROPOSED PART 196
ASBESTOS-CONTAINING SURFACE COATING MATERIALS

The spraying of asbestos-containing materials may cause detrimental effects to the safety, health, welfare, and comfort of the public. Experience in industry clearly indicates that inhalation of asbestos may cause serious disease, and that some asbestos related diseases may be found after exposure to relatively low levels of asbestos.

Alternatives to asbestos spraying include:

- 1.) The continued use of present spray on technique using substitute materials for asbestos.
- 2.) The use of other application methods.