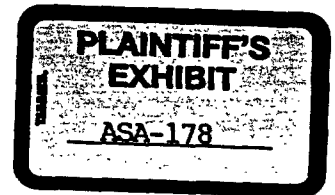


ASBESTOS TEXTILE INSTITUTE, INC.

FOUNDED 1944



April 6, 1976

Docket Officer, Docket H-033
U.S. Department of Labor
Room N-3620
3rd and Constitution Avenue, N.W.
Washington, D.C. 20210

RE: COMMENTS OF THE ASBESTOS TEXTILE INSTITUTE, INC., ON THE PROPOSAL BY THE OCCUPATIONAL SAFETY AND HEALTH ADMINISTRATION, UNITED STATES DEPARTMENT OF LABOR, TO REVISE THE STANDARD ON "OCCUPATIONAL EXPOSURE TO ASBESTOS" -- 26 CFR, PART 1910, SUBPARAGRAPH 1910.1001; FEDERAL REGISTER, VOL. 40, NO. 197, OCTOBER 9, 1975.

Dear Sir:

The ensuing statement constitutes the comments of and the position taken by the Asbestos Textile Institute, Inc., to specific revisions to the above-referenced "Occupational Exposure To Asbestos" Standard, especially as it relates to the asbestos textile manufacturing segment of the Asbestos Industry in the United States.

RISK MINIMIZATION

Prior to issuing comments to specific sections of the proposed revision, the Asbestos Textile Institute, Inc., wishes to affirm that it totally recognizes and firmly believes that all precautions

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should be exercised to preserve life, wherever and whenever possible. This Institute is committed to the belief that employers have a moral obligation to their employees to see that working conditions are as safe and as comfortable as proven technologies will allow. However it must be realized there will be a residual, unavoidable risk -- at work, at home and when at leisure. This fact is being recognized today in the United Kingdom, as promulgated in that Nation's Asbestos Regulations of 1969.

Over the years asbestos-containing products have been known specifically as safety products -- and rightly so. The number of diseases contracted and lives lost because of exposure to asbestos fibers during product manufacture is far less than the number of lives which have been saved or the number of personal injuries which have been prevented due to the use of asbestos-containing products. Product examples, to name a few, are firefighting suits, automotive brake linings, theater curtains and industrial heat protective clothing.

SPECIFIC SECTIONS OF THE PROPOSAL

Background Material

It is felt the Background Material is too vague and general to be considered soundly supportive of the need for a limitation of 0.5 fiber per cubic centimeter of air and a ceiling concentration limit of 5 fibers per cubic centimeter.

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New Evidence

Some of the New Evidence places the hazard factor on the smoking of cigarettes and not especially on exposure to asbestos. To quote directly from Section II--Toxicological Considerations of Exposure To Asbestos, Sub-Section C--The New Evidence, paragraph (2)(a), second sub-paragraph, page 47655: ". . . non-smoking asbestos workers had few lung cancers while those who smoked had much more lung cancer than would have been expected had they not been asbestos workers."

Based on Past Conditions

We maintain that the findings cited as the reasons why OSHA proposed its revisions to the Asbestos Standard are based on work conditions as they existed 35 or more years ago. Today's plants are cleaner and safer, new engineering techniques have been implemented, and effective protective clothing and apparatus are now being used -- all of which have improved working conditions and certainly make for a brighter future insofar as employees' health and safety are concerned. We feel that insufficient consideration is being given to current, improved working conditions.

We would add that work is continuing toward developing more effective methods to reduce the hazard factor -- striving for the development of technologies that will completely eliminate any hazard to the safety and health of all employees -- and still permit industry and the Nation to enjoy a healthy economic climate.

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Method of Measurement

Although we are not opposed to using the membrane filter method, we would point out there is significant observer error when taking a reading of a membrane filter sample, as well as variance between observers of the same sample. The reading error multiplies as fiber count levels approach zero. We suggest that OSHA permit other bonafide analytical techniques in addition to the membrane filter method. It is also suggested that OSHA recognize the limitations of the membrane filter method by specifying a plus and minus tolerance. We recommend +30%.

The Technological Feasibility Approach

It seems to us the proposed limitations are not based on scientifically-established, dose-response relationships and, therefore the approach should be one of reaching the lowest levels that are technologically feasible.

It is our contention that the 0.5 f/cc is not now technically feasible, because: (1) an accurate, reliable method of measurement has not, as yet, been found; and (2) because in some sectors of the asbestos industry, such as in certain phases of operation in asbestos textile manufacture, the 0.5 f/cc is unattainable with today's available technology. This is not to say that, some day, solutions will not be found. Work continues and we are confident that eventually techniques will be developed and will become available that will control occupational health hazards.

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Attaining Exposure Levels

The asbestos textile industry cannot, under existing available technologies, control asbestos dust levels at 0.5 fiber/cc in all of its phases of production. This is partly due to the basic processing techniques which must be followed and still produce asbestos textile products as we know them today. In certain processes of textile manufacture the fibers are used in a dry state. Although some of these processes cannot be totally enclosed at all times (See Attachment I), fiber emissions are controlled by the best engineering techniques available.

LONG-TERM TIME FRAME

The asbestos textile industry desires to do all it can toward reducing and eliminating any health hazard to its workers. However, an extended time period would be necessary for asbestos textile producers to develop new and more effective engineering technologies toward reducing dust levels.

ARE THE LOW EXPOSURE LIMITS REALLY NECESSARY?

This Institute believes there is medical, scientific evidence which tends to support the position that the "2 fibers/cc" exposure level does present a safe level. We urge that the evidence be fully studied before reaching a final determination to reduce the exposure level to 0.5 fiber/cc.

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ECONOMIC IMPACT

One might suggest that workers could be kept from getting any exposure to asbestos fibers if all work areas at asbestos textile operations were completely enclosed, if the most effective dust control methods and exhaust systems were utilized, and if the usual rules of good housekeeping were followed. It might also be suggested that all U.S. asbestos textile producers convert to the "wet process" of manufacture, thereby reducing exposure levels. Our answer to both suggestions would be in the form of the ensuing question: Could we, particularly in the face of low-cost foreign competition, afford to follow either of these procedures in its entirety? We say we could not in the short term. A comprehensive study would have to be made toward establishing a realistic long-term time frame -- taking into account both technological and economic capabilities.

Converting to the "wet process" would entail a complete renovation at all places of operation. All existing yarn-forming equipment would have to be scrapped and all new equipment installed. But the expense would not end there. Since conventional asbestos textile products would no longer be available, many customers and fabricators would have to develop new techniques to accommodate the physical and chemical differences of products made from wet-formed yarn.

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We cannot stress enough the financial impact that would be felt in simply trying to comply with the 0.5 fiber/cc and the 5-fibers/cc ceiling concentration limits. Added to this would be the expenses that would be incurred to meet several of the other proposed revisions. For instance, it would cost some of the larger asbestos textile manufacturers close to \$100,000 just to meet the proposed regulation that would require the installation of shower facilities. Coupled with this would be maintenance costs plus the continuing wage cost per employee for the non-production time that, in order to comply with the standard, would have to be allowed each worker to take the required shower.

Endeavoring to meet the proposed limitations could well be a financial disaster for many of the smaller asbestos textile manufacturers and fabricators. Looking at this picture, in total, one can easily foresee, for the industry and for the communities in which it has operations, a negative economic impact and a large increase in unemployment.

At the national level, a product price increase sufficient to absorb expenses to meet the proposed regulations would not permit the asbestos textile industry in the United States to compete in the international market. The volume of asbestos textile products imported into this Country would continue to increase simply because the foreign-made products would be far less expensive than more.....

the same U.S.-made products. Asbestos textile imports in 1972 were 5% of reported domestic usage. In 1975 they are estimated at 35%. We point out the danger that the United States may become totally dependent on other countries to meet its domestic asbestos textile requirements.

SUBSTITUTES FOR ASBESTOS TEXTILES

There are other high-temperature textiles available but to date none of them have proven to be a totally suitable substitute for asbestos-containing textiles. For example: Glass fiber textiles do not have good insulating properties. Safety clothing made of high temperature synthetics offer good heat resistance but cannot withstand temperatures as high as that made from asbestos-containing textiles. Since asbestos textiles are the only currently-available materials suited for certain applications, this Nation cannot afford to become dependent upon imports as its sole source of supply.

HOW ASBESTOS FIBERS BECOME AIRBORNE

Attached is a complete definition of the manner in which asbestos fibers become airborne at each step in the various processes of asbestos textile manufacture. The data indicate the specific problems of the asbestos textile manufacturer in meeting existing, forthcoming and proposed levels of exposure to airborne asbestos fiber.

Respectfully submitted,
ASBESTOS TEXTILE INSTITUTE, INC.



A. Kuzmuk, Chairman of the Board
of Governors & President