

November 10, 1980

Director
Environmental Protection Agency
401 M Street S. W.
Washington D.C. 20460

Dear Sir:

I have just become aware that a public hearing will be held in Washington D.C. on November 17 regarding a proposed regulation to reduce hazards of asbestos in schools. I have been associated with the manufacture and distribution of the joint compounds and textures which are used to decorate interior ceilings in homes, schools and offices and other buildings throughout the country for 30 years. My experience goes back to the time drywall construction was just coming of age and texturing with asbestos containing products became a popular method of decorating those ceilings.

Typically the texture would contain between 3% and 10% asbestos. It would be applied by spray or sometimes by roller or brush. The spray applied products contained a water soluble binder and often a light weight aggregate such as expanded vermiculite or expanded poly styrene. It was not until the late 1970's that asbestos was discontinued as a result of regulations imposed by the Consumer Products Safety Commission.

The asbestos in the texture products manufactured prior to the late 1970's is encased in a binder and other fillers which prevent it from becoming airborne once it is dry. Some of the textures, particularly those containing expanded aggregates, are inclined to flake off the surface because the aggregates may break loose. This does not mean asbestos is being released into the air.

I am not aware of any study indicating that there is asbestos being released from any of the millions of ceilings decorated with asbestos textures. The removal of the textures is an exercise in futility and a total waste of taxpayer dollars.

I was recently contacted by the GCA Corporation working under an EPA contract to explore uses of vermiculite which have been found to have trace amounts of asbestos. GCA was apparently involved in geophysical research and according to the caller, there was nothing to do in that area so GCA was assigned by EPA , the project of

determining where vermiculite was used since it might be a hazard. This is another complete waste of taxpayer dollars.

I want my statement to become a part of the record in the upcoming hearing. It is my recommendation that this study and the proposed removal or enclosure of ceilings decorated with textures containing asbestos be abandoned on the basis that there is no danger of airborne exposure to asbestos. This is one of the many unwarranted regulations, some of which have already been promulgated by government agencies. It is time to begin using better judgment in promulgating regulations as a bromide for every perceived concern regardless whether there is a valid reason for that concern.

Very truly yours,

C. W. Lehnert

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cc: Senator Mark O. Hatfield
Senator Robert Packwood
Representative Les AuCoin
President Elect Ronald Reagan