

FILE NAME: Quebec Asbestos Mining Association (QAMA)

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File D.O.T.

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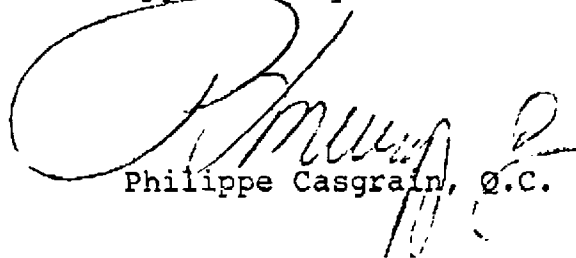
June 1st, 1977

R.H. Mereness
Executive Director
Asbestos Information Association-
North America
1835 K Street N.W.
Washington, D.C. 20006.
U.S.A.

Dear Sir:

On instructions from the QAMA, I am
enclosing herewith submission of the QAMA to the
Office of Hazardous Materials Operations, in
Washington.

I would appreciate your comments.


Philippe Casgrain, Q.C.

PC/cl
Encl.

c.c.: Paul Filteau
Maurice E. Taschereau
Marcel Dorais
J.R.M. Hutcheson
- Mike Prus
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JHM 15047

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June 1st, 1977

Docket Section
Office of Hazardous Materials Operations
Department of Transportation
Washington, D.C. 20590
U.S.A.

Dear Sirs:

Re: Docket No. HM - 145

We represent the Quebec Asbestos Mining Association (the "Association") which consists of all the major producers of asbestos in the Province of Quebec.

We have noted the Advance Notice of Proposed Rulemaking (the "advance Notice") which the Materials Transportation Bureau of the Department of Transportation issued on December 6, 1976 and published in the Federal Register on December 9, 1976 dealing with the transportation of hazardous substances. This Advance Notice requested comment on its proposals by interested parties and, in particular, on matters listed in paragraphs 1 to 10 of the section of the Notice entitled "Request for Comment". In response to this request, the Association wishes to submit the following points for your consideration.

1. We note that the proposed rules concerning transportation of hazardous materials are designed to meet the concerns expressed in various quarters about the transportation of materials whose potential release during or incident to transportation may result in unreasonable risk to property, the environment or to human health and

glue locking, paper and rubber inflatable dunnage bags, pallets, lift trucks, shrink wrap and stretch wrap techniques. The industry has also evaluated different types of transportation equipment, such as containers in the Export market and to a lesser degree, to the U.S. Some fibre is shipped to the U.S. and Canada by truck where it is economically feasible. The primary method of transportation to the U.S.A. is by rail. The industry is presently negotiating with the railways for assigned DFB cars.

Three (3) types of bags are in wide use at the present time:

1. Woven and plain polyethylene
2. 3 ply unsized Kraft paper
3. 3 ply sized Kraft paper

Woven and plain poly is recommended to all customers where the bag is not consumed in the mix because of its strength and resistance to damage. This bag must be disposed of after it is opened and the contents removed.

3 ply unsized Kraft paper bags are requested by users who place bags and content into a wet mix process. In this case the bags are not opened and are consumed along with the fibre in the mix. This eliminates a potential dust problem and the necessity of disposing of the bag. It is imperative that this method of packaging be retained until a suitable alternative can be developed.

The industry is at this time conducting experiments with respect to various possible improvements including the production and shipping of asbestos fibre in high density block form.

3. The possible biological hazards resulting from inhalation of asbestos fibres are totally different from that resulting from most other substances mentioned in the Advance Notices as being hazardous such as sulphuric acid whose effects are immediate and violent.

6. The Association does not believe that it is necessary in the interest of health and safety to place health warning notices on rail cars or trucks carrying asbestos fibre, since such notices, conforming to OSHA requirements, already exist on the bags containing such fibre.

However, the Association believes that notices could appear on bag, or where this is impractical that notices could be placed inside rail cars or trucks carrying asbestos fibre instructing that in case of an accident involving the breakage of bags of fibre, such bags should be sprayed with water to avoid creation of dust. In addition respiratory protective devices could be provided to those having to deal with transloading or accidental spillage of fibre. Respirators are widely available which have been tested and approved by experts of McGill University, Montreal, under the auspices of the Institute of Occupational and Environmental Health.

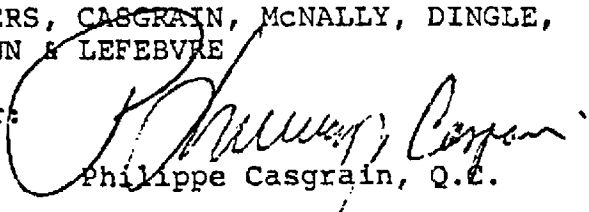
7. The asbestos and asbestos products industries have been the victims not only of inflation and of the general recession in economic activity but also of much unfavourable publicity in recent years and now face increasing competition in their traditional outlets from substitute materials. In these circumstances, the sale and marketing of asbestos is becoming more difficult and the imposition of regulations over and above those necessary to protect against any real dangers to health and safety in the transportation of asbestos fibre would have substantial and unfavourable consequences on the industry.

We shall be glad to answer any questions you may have concerning the above comments and to assist you in any way you deem appropriate.

Yours truly,

BYERS, CASGRAIN, McNALLY, DINGLE,
BENN & LEFEBVRE

per:


Philippe Casgrain, Q.C.

PC/cl

JHM 15052