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@ 11/26/79

SCHICK
INCORPORATED

(717) 394-4031
216 GREENFIELD ROAD
LANCASTER, PENNSYLVANIA 17604

November 21, 1979

Ms. Catherine C. Cook, Director
Product Defect Correction Division
U. S. Consumer Product Safety Commission
1111 18th St. N.W.
Washington, D.C. 20207

Dear Ms. Cook:

This will acknowledge receipt of your letter of November 2, 1979, wherein you enclosed the final NIOSH report and also the report of Dr. Nicholson. In your letter you invited any comments that Schick might wish to make regarding either report and we would submit the following to you.

The NIOSH report in the "Background" section indicates that the CPSC was desirous of determining the possible release of asbestos fibers from hand held hair dryers. The section went on to conclude that a determination of the emissions of asbestos from hand held hair dryers would require both the identification and quantification of the fibers emitted. Schick believes those two statements were, in fact, the basis upon which CPSC sought the assistance of NIOSH. What disturbs us, is why, with this predicate, were three table top hooded models tested, a hobby heat gun tested and a heavy duty commercial salon type dryer tested. In particular, the use of a hobby heat gun bears no relationship to emissions of hand held hair dryers. As the test data clearly indicates, the heavy duty commercial salon type dryer and the hobby heat gun were indeed significantly higher in giving off emissions than were any of the hand held hair dryers. By including the hobby heat gun and the heavy duty commercial salon type dryer, the NIOSH report is skewed entirely out of context to hand held hair dryers.

Dr. Nicholson's report, relying as it does upon the NIOSH results which include the hobby heat gun and the heavy duty commercial salon type dryer is therefore open to the same criticism. However, Dr. Nicholson's report goes further and reaches conclusions that are not supported by the hand held hair dryer data. The data that Dr. Nicholson uses to reach his conclusion includes the hobby heat gun, the heavy duty commercial salon type dryer and three hooded table top dryers which are not at issue in the CPSC inquiry. If we were to eliminate the data in the NIOSH report pertaining to hobby heat guns, heavy duty commercial salon type dryers and hooded table top dryers, his Table 1 for only hand held hair dryer data would read as follows:

Hand held hair dryer
effluent measurements

ng/M3 Less than	Number of samples	Percentage of samples
1	21	45.7
2	24	52.2
5	29	63.0
10	35	76.1
20	41	89.1
50	46	100.0

Thus, the conclusions reached by Dr. Nicholson are not supported by the data as it pertains to emissions of hand held hair dryers. The summary which Dr. Nicholson makes is, therefore, inaccurate and incorrect insofar as it pertains to hand held hair dryers.

We would also point out that the data included emissions for Schick hand held hair dryers of .14 and 0 for the Lady Schick hair dryer and .22 and 2.2 for the Model PD-1001A.

Schick as well as others has been subject to massive amounts of extremely adverse publicity which in light of the data generated by the NIOSH report is unjustified and in Schick's opinion no health-hazard conclusions can be drawn from the NIOSH data. Indeed, even Dr. Nicholson is unable to state what, in fact, the health risk is, but nevertheless concludes that given the large number of individuals exposed to asbestos, the source should be eliminated.

In Schick's judgment, the conclusion reached by Dr. Nicholson is neither medically nor scientifically supportable. Dr. Nicholson seemingly correlates the exposure of a small number of individuals at high levels of concentration with the exposure of a large number of individuals at extremely low asbestos concentration levels. He cites no medical authority in support of that position.

We should note that Schick has not manufactured any hand held hair dryers in the last five years which contain asbestos.

We believe that it would be in order for the CPSC to make a statement to the effect that the data contained in the NIOSH report insofar as it concerns heavy duty commercial salon type dryers, hobby heat guns and hooded table top dryers should not be read as having any reference to hand held hair dryers.

This letter raises a number of questions as to why hobby heat guns, heavy duty salon type dryers and hooded table top dryers were included in the test samples and the fact that Dr. Nicholson based his conclusion upon the emissions of all the samples. Given the fact that these reports are going to be made public, we would appreciate a prompt reply.

We thank you very much for your consideration in this regard.

Very truly yours,

Samuel H. Kohler

Samuel H. Kohler
Vice President
Research & Development
and Engineering

cc: Chairman King ✓
CPSC

Mr. D.B. McKane, Sr. V.P.
Schick Incorporated

Mr. W.J. Leary
Rich, May, Bilodeau & Flaherty

11 ID CASES-DRYERS
ASBESTOS-CONTAINING

1) ID 79-108 Conair Corporation
2) ID 79-109 General Electric Corporation
3) ID 79-110 The Gillette Company
4) ID 79-111 Hamilton-Beach (Scovill)
5) ID 79-112 J.C. Penney Company, Inc.
6) ID 79-113 Korvettes, Inc.
7) ID 79-114 Montgomery Ward & Company
8) ID 79-115 Norelco/North American Phillips
9) ID 79-117 Schick, Inc.
10) ID 79-118 Sears, Roebuck & Company
11) ID 79-119 Sunbeam Corporation