LaKocca VI request

Asbestos Information Association/North America

22 East 40th Street
New York, N. Y. 10016
(212) 661-8206

February 28, 1972

U.S. Department of Labor
Occupational Safety and Health Administration
Office of Safety and Health Standards
Room 305
400 First Street, N.W.
Washington, D.C. 20210

Dear Sirs:

This is to formally request that the Asbestos Information Association/North America be placed on the agenda to present oral testimony at the public hearing scheduled for March 14, 1972, in Washington, D.C., with regard to the proposed rule making procedure to develop a Standard for Exposure to Asbestos Dust as set forth in the notice in the Federal Register of Wednesday, January 12, 1972.

The following three individuals will present testimony on behalf of the AIA/NA:

Mr. A. H. Fay*
Vice President, National Gypsum Company
325 Delaware Avenue
Buffalo, New York 14202

Mr. Matthew M. Swetonic
Executive Secretary
Asbestos Information Association/North America
22 East 40th Street
New York, New York 10016

Hans Weill, M.D.
Professor of Medicine
Tulane University School of Medicine
Pulmonary Diseases Section
1430 Tulane Avenue
New Orleans, Louisiana 70112

* Mr. Fay is President of the AIA/NA and will appear in that capacity.

Sponsored by Atlas Asbestos Co., Cement Asbestos Products Co., Certain-teed Products Corp., Flintkote Co., GAF Corp., Johns-Manville Corp., National Gypsum Co., Panacon Corp. and Raybestos-Manhattan Inc.



It is anticipated that the testimony of the above three witnesses will take approximately one hour, and will be in opposition to the proposed rules. We request that the three AIA/NA representatives be scheduled in the order given above because of the interrelated nature of their testimony.

For your information, the Asbestos Information Association/ North America consists of 12 of the nation's largest miners, manufacturers and importers of asbestos and asbestos containing products. A list of the member companies of the Association is attached.

Because the AIA/NA testimony is being drafted so as to present an overview of the entire asbestos-health situation as it relates to the proposed rules, we request that the AIA/NA presentation be scheduled prior to those of the individual Association member companies that request space on the agenda. In addition, a number of other companies in the asbestos industry have indicated to us that they may request time to testify on March 14. We request that the AIA/NA be scheduled on the agenda ahead of these companies as well. These companies are: Congoleum, Flintkote Company, Kentile Floors Inc., Nicolet Industries Inc., H. K. Porter Company, and Union Carbide.

We would appreciate being informed in advance of the approximete time and date (if other than the 14th) of our testimony. We would also appreciate knowing in advance the position on the agenda of our testimony with regard to the member companies of the AIA/NA and the other companies listed above.

Very truly yours,

A. H. Fay

A. H. Fay
President

Enclosurer

ASBESTOS INFORMATION ASSOCIATION/NORTH AMERICA MEMBER COMPANIES

AMERICAN ASBESTOS TEXTILE CORPORATION
Post Office Box 228
1032 Stanbridge Street
Norristown, Pa. 19401

ATLAS ASBESTOS COMPANY
5600 Hachelaga Street
Montreal, Canada

CAPCO (Cement Asbestos Products Co.)
Woodward, Ala. 35189

CASSIAR ASBESTOS CORPORATION, LTD.
85 Richmond Street West
Toronto 1, Ontario, Canada

CERTAIN-TEED PRODUCTS CORPORATION
Valley Forge, Pa. 19481

GAF CORPORATION
140 West 51 Street
New York, New York 10020

JOHNS-MANVILLE CORPORATION
22 East 40th Street
New York, New York 10016

NATIONAL GYPSUM COMPANY
325 Delaware Avenue
Buffalo, New York 14202

NORTH AMERICAN ASBESTOS CORPORATION
150 North Wacker Drive
Chicago, Illinois 60606

-MORE-

PANACON CORPORATION
320 South Wayne Avenue
Cincinnati, Ohio 45215

RAYBESTOS-MANHATTAN
205 Middle Street
Bridgeport, Conn. 06603

SUPRADUR MANUFACTURING CORPORATION
122 East 42 Street
New York, New York 10017

Asbestos Information Association trial exhibit AIA-90: A. H. Fay to U.S. Department of Labor (OSHA) Requesting Ti...
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Table 4

AVERAGE DUST CONCENTRATIONS IN INSULATION WORK WITH IMPROVED INDUSTRIAL HYGIENE PRACTICES

Type of Work	Fiber Concentration Possible with Improved Industrial Hygiene Practices (fibers/cc)	Fiber Concentration Possible With Improved Practices and use of Approved Disposable Respirator (fibers/cc)
Mixing and Applying Cement and Cloth Covering to Insulation Material		
Good Ventilation	0.5	0.05
Poor Ventilation	1.0	0.1
Cutting and Applying Insulation Block or Sections of Pipe Covering		
Good Ventilation	2.5**	0.3
Poor Ventilation	5.0**	0.5
Cutting Materials for later use	1.5	0.2
Spraying Turbines with Asbestos Fiber		
Spray man	0.7*	
Hopper man	0.1*	

* The reduced fiber levels shown here are possible with the use of a portable air supplied respirator. Similar dust reductions can be made during the removal of old insulation material, another extremely dusty job.

** The use of an approved disposable respirator is highly recommended for this work.

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