PLAINTIFF'S EXHIBIT

UC-4108

ASBESTOS INFORMATION ASSOCIATION
NORTH AMERICA
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December 23, 1976

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Mr. Al Libra
General Counsel
California Manufacturer's Association
P. O. Box 1138
Sacramento, CA 95805

Cal Mgrs

Dear Al:

The information package that we discussed at the recent meeting in San Francisco is enclosed. It includes:

1. General Criteria for Assessing the Evidence for Carcinogenicity of Chemical Substances. (A number of the committee members expressed a wish to have a copy of this.)

2. An AIA/NA estimate of worker exposure levels and work locations in California.

3. The AIA/NA position on sputum cytology.

4. An AIA/NA suggested position on registration and exemption under the Carcinogenic Substances Control Act of 1976.

5. Some literature on asbestos and health.

6. The Johns/Manville presentation to Federal OSHA regarding the "no-safe level for carcinogens" theory.

You are probably aware that the Asbestos Advisory Committee did firm up some recommendation to the Standards Board regarding registration. I have not seen all of the details yet, but they seem to be fairly reasonable. They were, however, only registration requirements, not exemptions for those uses not covered by registration. In view of the potential serious penalties for even small violations of the carcinogen type standards it seems very worthwhile to try for the exemption. This aspect will be pursued further with the members of the Asbestos Advisory Committee.

The critical problem that now faces asbestos is to avoid a scare campaign as the state implements Article 4, Section 24 232. A campaign with the theme that everyone in the state is threatened with asbestos-related cancer could literally create a panic in the streets and cause serious disruption in many industries, particularly construction. This has happened last year in

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both England and Sweden. Vinyl chloride which also occurs widely in items in contact with the general public obviously faces the same risk. I suspect that the 14 carcinogens, which are hardly household words, will stir very little interest from the general public. If benzene should be added in the future, however, it would be present wherever motor gasoline is used and we would be back in the asbestos, vinyl-chloride situation. The need for a definition now of firm guidelines for the state communication and education plan is clear.

It seems to me that the point to stress with the state can be found directly in Section 24232, which says in part:

> "24232. The state department shall make every effort to ascertain the identities of existing users of carcinogens and to notify, inform, and educate them about the requirements of this chapter on or before July 1, 1977."".....
>
> "... governmental agencies to inform affected employees, employers, and the public of the requirements of this chapter." Emphasis added.

The key words are to inform "... of the requirements of this chapter." These requirements include reporting under certain circumstances, compliance with the appropriate regulations, and certain employee information responsibilities. This is clearly not a mandate to conduct a publicity campaign on the hazards or more particularly the alleged hazards of the materials in question particularly when the actual extent of the hazard is so controversial. I think the approach adopted at the last meeting, i.e., to talk informally with the state officials on their publicity plans, is an excellent way to go and I will be most interested to hear how it comes out.

I also want to express the appreciation of the AIA for the invitation to attend your meeting. I we can be of any help, please let us know.

Sincerely yours,

Harrison B. Rhodes
Chairman, Standards & Technical Committee

HBR:dal
Enclosures

CC: J. Austin
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