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July 9, 1976

Morton Corn, Ph.D., Assistant Secretary of Labor
U.S. Department of Labor
200 Constitution Avenue N.W.
Washington, D.C. 20210

Dear Dr. Corn:

It appears that we have a special question relating to the asbestos standard promulgated by OSHA. During the course of our industrial hygiene surveillance of Bell System companies, we find that the asbestos concentrations inside the vast majority of our office buildings approximate or are less than the concentrations of asbestos fibers found in the outside community air. Typical concentrations within our buildings average 0.06 fibers per cc of air, whereas typical values for the ambient air in the vicinity of the same Bell System buildings average 0.1 fibers per cc of air. All airborne concentrations within our buildings have consistently been well below the standard of 2 fibers per cc of air.

If the present asbestos standard is taken literally, the finding of even a single fiber (not necessarily asbestos) is cause for instituting special monitoring and medical surveillance procedures for employees located within those buildings.

Needless to say, we will continue to collect information on airborne asbestos levels through our self-initiated studies and in response to questions from employees who have become greatly concerned about asbestos because of notoriety in the press. However, I believe it is also fair to say we have begun to wonder about the reasonableness of an inordinate expenditure of time and effort on monitoring and surveillance procedures for those operations having exposure levels below background.

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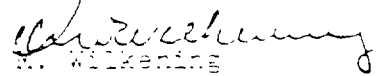
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We would, therefore, appreciate an interpretation from you as to the manner in which the scope and applicability of the present asbestos standard relate to the kind of work environment cited above.

This brief letter is designed to introduce our asbestos question to you. If you believe a more detailed discussion would be profitable, we would make ourselves available to meet with you.

Your perspective on this question would be greatly appreciated.

Regards,



G. R. Wilkening
Head, Environmental Health
and Safety Department

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