

STATEMENT BY TBA INDUSTRIAL PRODUCTS LTD.

PLAINTIFF'S
EXHIBIT

JM-1978

OSHA ENQUIRY

As a processor of asbestos fibre and manufacturer of asbestos textiles for almost 100 years, this Company has a unique record of experience in the field of asbestos and asbestos-related diseases. It has co-operated with U.K. Government Departments in the recognition of asbestos-related diseases and has carried out its own research into the health of the workers and means by which environmental working conditions could be monitored and improved to make them safer.

Because of this background and the fact that we appear to have been alone in our early attempts to correlate long-term exposure to asbestos airborne dust and the health history of the labour force, a degree of importance has been attached to this work which was never expected and in some quarters our work has taken on the mantle of a world authority.

In January, 1976 we were approached by Dr. Hans Weill, Medical Consultant to the A.I.A., North America, with a request for detailed information on any "new evidence" which was available to relate to the OSHA proposal for a reduction in the U.S. Occupational Exposure Standard for asbestos dust from 5 fibres/ml to 0.5 fibres/ml.

Data was made available on a cohort of our workers with at least 10 years exposure to asbestos dust and with no exposure prior to 1st January, 1951. This data included :-

- (a) a record of dust survey results by location within the factory during the period 1961 to 1972;
- (b) mortality and morbidity of the exposed workers in relation to cumulative exposure in fibre years/ml, fibre years/ml being the term used in adding the mean exposure rates for each year of exposure over the total period exposed.

The same data is herewith made available for use at the OSHA hearing.

We were given to understand that the view was mistakenly held in some quarters in the U.S.A. that dust levels in our particular factory had been at or below 2 fibres/ml for many years, and it was against this background that the health record of our workers was being judged.

Whilst this was true for certain locations it was by no means the level which had obtained on many of our operations.

The U.K. Asbestos Regulations 1969 (with their associated Technical Data Note 13) were the first attempt to specifically define permissible dust levels for asbestos airborne dust. These stipulate a minimum T.L.V. of 2 fibres/ml with an upper limit of 12 fibres/ml for all types of asbestos excluding eriochloite (where the T.L.V. is one tenth that of other asbestos fibres).

It will be noted from Table 1 that the two operations have been below the 2 fibres/ml since 1965 and close to it prior to this date, were the Lining looms and Cloth looms in the Weaving Department. These results are indicative of the general conditions in this area of the factory.

Tables 9 and 10 show that no member of the cohort from the Weaving Department has been exposed to more than 75 fibre years/ml and furthermore there has been no incidence of asbestos-related disease amongst any of these workers.

Table 3 compares actual and observed death of the cohort with the expected rates from national statistics for this geographical region.

The six deaths from lung cancer are also itemised in Table 3 against their personal history in relation to asbestos exposure and smoking habits.

Our hygiene programme at this factory has continued to steadily improve working conditions over the years and the current target of 2 fibres/ml in all working areas, where respirator protection is not required to be worn, will be achieved by 1st January, 1977.

The interpretation of our data in relation to the risk of disease from inhaled asbestos dust has been left to recognised medical authorities and their statisticians who specialise in studying asbestos diseases.

Dr. Hans Weill has also drawn his own conclusions from our data and we would hope this would provide a clearer understanding of the situation within our Company in case it has been misunderstood in the past.

If required we would be happy to give verbal clarification of any point relative to the data provided to Dr. Weill.

Signed, N. Rhodes 11 Aug 1976
N. RHODES.