

POSITION STATEMENT

To: Members of the Senate
Date: February 1, 1990
Re: Senate Bill 769 & Asbestos Standards

We are writing to give our position on the general industry and construction asbestos standards promulgated by the Michigan Occupational Health Standards Commission.

Since these rules greatly exceed federal OSHA standards we are in support of Senate Bill 769, which would require Michigan to follow the federal requirements.

Our position was based on the following considerations:

- The Michigan Occupational Health Standards Commission, at its public hearing for the general industry and construction asbestos standard, failed to adequately weigh the evidence put before it. Relevant information presented by members of the Asbestos Advisory Committee composed of labor, management, and public members appointed by the Michigan Occupational Health Standards Commission was not considered. Afterwards, Commission deliberation took less than one hour. The vote was 4 to 3.
- The proposed asbestos standards adopted by Michigan Occupational Health Standards Commission are much more restrictive than federal or other states' regulations. This will put the State of Michigan at an economic disadvantage with the rest of the nation, with no evidence that these standards would provide greater health and safety protection than the federal standards.
- The standards adopted by the Commission do not cover the same points as the OSHA asbestos standards. Thus, as changes are made at the federal level, special rule making will have to be undertaken at the state level in order to have the standards be consistent.
- Information available to the Advisory Committee did not identify the public or its workers in the State of Michigan as being at unusual risk of developing asbestos-related diseases when compared to the rest of the United States.
- The general industry and construction asbestos standards proposed after more than two years of study by the Asbestos Advisory Committee to the Commission for use in Michigan were very similar to the federal OSHA asbestos standards.

- The proposed exposure limits for Michigan (0.1 fiber/cc) adopted by the Commission are twice as strict as the federal limits (0.2 fiber/cc).
- The Commission added provisions of the Asbestos Contractors Licensing Act - Public Act 147 to the proposed standards. This makes the standards more rigorous than either the OSHA asbestos standards or P.A. 147. These include:
 - Post abatement air sampling on all projects involving the removal of 10 linear or 15 square feet of insulation.
 - Aggressive air sampling.
 - Post abatement clearance level of 0.01 fiber/cc of air.
 - 24 hours of training for all asbestos abatement workers.
- The Asbestos Contractors Licensing Act contain a sunset provision negotiated with labor, however, the Occupational Health Standards Commission folded the provisions of P.A. 147 into the proposed general industry and construction asbestos standards.

The following associations and companies support the above position:

Allied-Signal Automotive
Consumers Power Company
Detroit Edison Company
Dow Chemical
Ford Motor Company
General Motors Corporation
Michigan Manufacturers Association

POSITION STATEMENT

To: Members of the Senate
Date: February 5, 1990
Re: Senate Bill 769 & Asbestos Standards

We are writing to give our position on the general industry and construction asbestos standards promulgated by the Michigan Occupational Health Standards Commission.

Since these rules greatly exceed federal OSHA standards we are in support of Senate Bill 769, which would require Michigan to follow the federal requirements.

Our position was based on the following considerations:

- The Michigan Occupational Health Standards Commission, at its public hearing for the general industry and construction asbestos standard, failed to adequately weigh the evidence put before it. Relevant information presented by members of the Asbestos Advisory Committee composed of labor, management, and public members appointed by the Michigan Occupational Health Standards Commission was not considered. Afterwards, Commission deliberation took less than one hour. The vote was 4 to 3.
- The proposed asbestos standards adopted by Michigan Occupational Health Standards Commission are much more restrictive than federal or other states' regulations. This will put the State of Michigan at an economic disadvantage with the rest of the nation, with no evidence that these standards would provide greater health and safety protection than the federal standards.
- The standards adopted by the Commission do not cover the same points as the OSHA asbestos standards. Thus, as changes are made at the federal level, special rule making will have to be undertaken at the state level in order to have the standards be consistent.
- Information available to the Advisory Committee did not identify the public or its workers in the State of Michigan as being at unusual risk of developing asbestos-related diseases when compared to the rest of the United States.
- The general industry and construction asbestos standards proposed after more than two years of study by the Asbestos Advisory Committee to the Commission for use in Michigan were very similar to the federal OSHA asbestos standards.

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- The Commission added provisions of the Asbestos Contractors Licensing Act - Public Act 147 to the proposed standards. This makes the standards more rigorous than either the OSHA asbestos standards or P.A. 147. These include:
 - Post abatement air sampling on all projects involving the removal of 10 linear or 15 square feet of insulation.
 - Aggressive air sampling.
 - Post abatement clearance level of 0.01 fiber/cc of air.
 - 24 hours of training for all asbestos abatement workers.
- The Asbestos Contractors Licensing Act contains a sunset provision negotiated with labor; however, the Occupational Health Standards Commission folded the provisions of P.A. 147 into the proposed general industry and construction asbestos standards.

The following associations and companies support the above position:

Allied-Signal Automotive
 Associated General Contractors - Michigan Chapter
 Chrysler Corporation
 Construction Association of Michigan
 Consumers Power Company
 Detroit Edison Company
 Dow Chemical
 Dow Corning Corporation
 Ford Motor Company
 General Motors Corporation
 Masco Corporation
 Michigan Chemical Council
 Michigan Manufacturers Association
 Motor Vehicle Manufacturers Association
 National Electrical Contractors Association - Michigan Chapter

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