

GERALD FOX

Gerald,

Please call me re the attached.

Thanks,

Martha



## ASBESTOS INFORMATION ASSOCIATION

1660 L Street, N.W. / Washington, D.C. 20036 / (202) 223-4885

21 October 1975

Memorandum For: MEMBERS

Subject: Items of Interest

The following items of interest are invited to your attention:

### I. Proposed Revision OSHA Asbestos Standard

- A. Time Extension for Comments Request: At the direction of the Executive Committee, the Association has formally communicated with the Secretary of Labor to request an extension of 120 days from Dec. 8 to comment on the proposed revised asbestos standard. ( See letter attached.)
- B. Environmental Impact Statement: OSHA's environmental impact statement ( see Document , p. 47659, Section VI) is expected to be derived from preamble to proposed revised standard with additional comment to effect that whether final exposure level of standard is no exposure, that which is proposed or greater than that proposed, effect on external environment is nil through control of fiber within workplace. Document notes comments that may be helpful in preparing impact statement are solicited and requested by Nov. 10. Document further states "once the draft environmental impact statement has been prepared, a copy of it will be available by OSHA to any member of the public who requests an opportunity to comment on it." A 45 day period is allowed from date of publication in the Federal Register of notice of availability of statement. It is required that draft statement will be available at least 15 days prior to public hearing on proposed standard.

- C. Inflationary Impact Statement and Analysis - OSHA will soon issue contracts to 6-8 companies from among 14 responding to letter soliciting interest for economic impact studies on as many as 25 proposed standards affecting various industries including asbestos. Fulfillment of asbestos contract and follow-on in-house assessment study to prepare statement on basis of feasibility will take 4-6 months.
- D. AIA/NA Asbestos Standard Task Force - Guy Gabrielson, chairman of the board Nicolet industries, lawyer and business executive, well known to members for in-depth knowledge of asbestos industry and asbestos-health issues, will serve as key member of Association task force on presenting industries' case. Dr. Hans Weill, AIA/NA medical consultant, heads Association's task group to review and analyze medical literature referenced in Document. He and others of the Association task force are working in close coordination with J-M medical, technical and legal groups headed by Dr. Paul Kotin, J-M's director, Environmental Health and Safety Department.
- E. International Interest - Association has received numerous communications following publication of proposed revised standard. Following from international sources quoted as of outstanding interest:
- "New proposed OSHA standard received X Preliminary reading raises many comments and questions but please note Asbestosis Research Council and Asbestos Information Committee anxious to provide maximum support to AIA/NA in contesting proposals including provision expert witnesses at hearings as required X Look forward hearing how can best assist X" Regards Michael Howe, Turner Newell, U.K.
- " Please inform us about Notice of Rule Making on occupational exposure to asbestos...on which 0.5 fibers per/cc and ceiling value of 5 fibers suggested. Will you do something about this crass increase? In my opinion, this hardly bearable by industry...of (significant) interest to us as in December introduction of 2 fiber value shall be finally discussed during conference of MAK Commission. X" Dr. Klaus Robeck, Director, Asbestos Industry Association, Germany,
- Chairman of Standing Committee, International Asbestos Information Conference has been informed of proposed revised U.S. OSHA standard.

## II. Asbestos in the Media

Attached are extracts having to do with asbestos from CBS Special 60 minute Report, "The American Way of Cancer" which was telecast Oct. 15. Of interest is the absence of Dr. Irving Selikoff, a usual figure in similar reports. Oft told Patterson and Manville, New Jersey stories are dramatized. Dr. Harry Anderson of Mt. Sinai School of Medicine gives comment. EPA Administrator, Russell Train states environmental actions can be taken which both protect health and support economy. Other news media items may be found in current issue of News & Notes.

## III. Workers' Compensation Reform

By memorandum of July 15, members were forwarded a preliminary review of "National Workers' Compensation Act of 1975," comparing Williams-Javitts S-2018 with predecessor bill S-2008 introduced in immediate past Congress. Enclosed is a comparative analysis of S-2018 and H.R. 9431, the House version introduced by Daniels (D-NJ) and Perkins (D-Ky) Sept. 8. Analysis was made for AIA/NA by Government Research Corporation. GRC "has concluded that the 94th Congress will very likely enact legislation regulating state workers' compensation programs" along lines proposed in S-2018 and H.R. 9431 with adjustments for differences.

  
R. H. Mereness  
Executive Director

Enclosures  
RHM:vld