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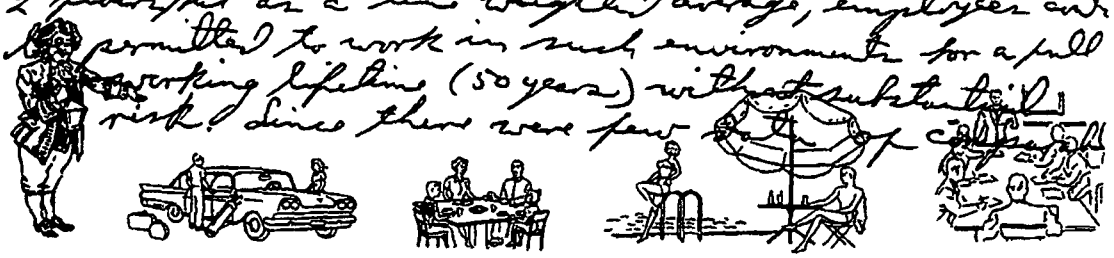
To: Geoffrey Nicholson
Chief Engr
Winchester F.P.G.

In reference to your letter of 11/18/75, subject: "Proposed Tightening of OSHA Standards for Asbestos", I have reviewed the contents and offer the following comments. I sincerely hope that they will be considered pro-industry.

The recently promulgated 0.5 fiber/ml proposed standard was a progressive reduction from the previously proposed 2 fiber/ml standard based on new research and statistical data which revealed that carcinogenic and related effects do occur at exposure levels well below the latter proposed limit. The two fiber limit was first established from data collected on 290 asbestos textile workers in Great Britain. These workers exhibited some of the few exposures worldwide which had been ~~accurately measured and~~ consistently measured since 1933. In 1971, the available data on these workers showed little evidence of clinical disease and suggested that the incidence of cancer and asbestosis would be markedly reduced by reduction of occupational exposure to identified levels. The Committee of the British Occupational Hygiene Society came to the conclusion that by lowering the permitted level to 2 fibers/ml as a time weighted average, employees could be permitted to work in such environments for a full working lifetime (50 years) without substantial risk. Since there were few data of [illegible]



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