FROM ROBERT P. CARTER
HEALTH & ENVIRONMENT DEPARTMENT
PITTSBURGH OFFICE, 7

TO

IH NEWSLETTER

July 22, 1975

RE: OSHA ASBESTOS STANDARD - REGULATION 1910.1001 (FORMERLY 1910.93a)

At the time when the OSHA permanent standard for worker exposure to asbestos was promulgated in June of 1972, it established an 8-hour, time-weighted average airborne concentration of asbestos fiber of 5 fibers, longer than 5 micrometers, per cubic centimeter of air effective July 7, 1972, with this value to be reduced to 2 fibers per cubic centimeter effective July 1, 1976. There is a good probability that the reduction in permissible employee exposure level to 2 fibers per cubic centimeter will be proposed by OSHA to become effective well before the original date of July 1, 1976. In the light of this situation, all locations making any use of asbestos products, particularly our refining, smelting and ingot locations, should review their situations with respect to their capability of meeting the 2 fiber per cubic centimeter limit by a much earlier date, which could be as soon as December 1, 1975 or January 1, 1976.

We believe that it is essential that each location review very carefully the materials which it is presently using for insulation and refractory purposes, including possible uses of asbestos paper and board which can give rise to airborne asbestos fiber. There have been several instances recently where asbestos products have been found to be still in use in such a way that would give detectable airborne fiber concentrations in routine production operations. While the airborne fiber concentration determined at these operations was not excessive, it was measurable and, as such, will require medical examinations for the exposed employees. Of course, all scrap and waste material containing asbestos must be disposed of in accordance with the requirements of the standard.

The cost impact of these required medical examinations and the waste material disposal practices may well be such that further effort should be devoted to finding non-asbestos alternates to eliminate the problem altogether.

For those ingot locations which are still sawing and machining marinite for headers where there is the expectation of replacing this usage with ceramic headers as outlined in Mr. J. A. Dunbar's letter of June 10, 1975 re "Pilot Production of Ceramic Headers," it appears that there is a good probability that such a change-over to ceramic headers will not be completed before any advanced effective date of the two asbestos fiber per milliliter OSHA standard, and perhaps not even by the presently mandated date of July 1, 1976. As soon as sufficient manufacturing and casting experience with ceramic headers has been realized, these locations

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should develop as definite a program as possible for their complete conversion to ceramic headers, including estimated dates for the completion of the various phases of this change-over. The development of this definite written program can then be used as the basis for the use of appropriate respirators for any workers having asbestos exposures in excess of the two fiber per milliliter limit until the change-over to ceramic headers has been completed and the use of marinite discontinued altogether.

At the present time we do not know whether there will be any other changed requirements in the standard than the earlier effective date for the two fiber per cubic centimeter limit. However, if there are any additional or changed provisions, we will advise you of these and their possible impact promptly.

ROBERT P. CARTER

RPC:lms

Letter to: Industrial Hygienists
Copies to: Environmental Steering Committee Chairmen

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