employment of minors, reporting of cases, employee and employer responsibility, and specific hazards. The majority of the codes have tables of allowable concentrations of atmospheric contaminants. These tables vary widely in scope and to some extent in the values given for the limits. The limits have legal status in about one-half of the states; in the remainder they are suggested hygienic standards.

Weaknesses of Present State Codes

There has been no very important remedy to the weaknesses and deficiencies of the codes that were pointed out by Bloomfield.[2] The variability and diversity of content continue to make it difficult to develop national policies for safeguarding the health of industrial employees. This is of particular importance to industrial concerns that operate in several states. It is also important to designers of structures, equipment, and processes, to trade associations that carry on health activities among their members in many states, and in fact, to all interests. Many of the codes do not have guiding principles to assist industry in achieving good working conditions; also they are inadequate in providing specific information which would show industry how it can comply with the code requirements. There are many areas of indefiniteness and inadequacy which hinder good administration.

There continues to be a multiplicity of agencies within most of the states with authority to promulgate and administer rules and regulations pertaining to industrial hygiene. There are few states that have less than two such agencies and some have five or six. In addition, a single one of these agencies may have a dozen or more separate and sometimes conflicting codes. This overlapping of authority and purpose creates duplication, confusion, and conflict among the agencies, and creates problems for the employer and all others concerned.

The variable and diverse nature of the present state codes is a rather natural product of the power that exists within the states to promulgate and administer such regulations, and the right of each state to promulgate a code of its own choosing. This has resulted in a situation which, although undesirable and irksome, has provided a grand experiment in code preparation and administration, the results of which have been very substantial. There have been contributions to better working conditions, to elucidation of attention to industrial hygiene practices, to the desired scope, character, and administration of such codes, and to the determination of areas of deficiency. It appears, however, that this naturally occurring experiment has practically served its purpose and that real attention should be given to

improving the code situation. Although some peculiarities of occupational exposure to harmful agents may occur among the states, the variety of processes and agents, and the opportunities for exposure are generally similar, and there appears to be only minor need of specialization or tailoring of codes to meet specific state requirements. Further, if the industrial hygiene codes are to be representative of the best knowledge, practices, and scientific data, it is a sound expectation that they would and should be far more uniform than they are at the present time. Their divergencies alone condemn them.

ACGIH Model Code

It has been mentioned that a part of Bloomfield's[2] discussion pertained to a pattern for a model code that was designed to remove the undesirable features of the existing code situation; also, that a Committee of the American Conference of Governmental Industrial Hygienists (ACGIH) was engaged in the drafting of a code along the lines of the pattern that he presented. The aims and objectives of this pattern were briefly, a code that was adequate, practical, and based on scientific fact; aimed to inform management what its responsibilities are, and how safe and healthy working conditions may be achieved; and so worded to take into consideration various social and economic aspects of the problems. Some of the more specific features were to provide reasonable guides or principles which would enable industry to maintain the health of its workers at a high level; to reconcile this endeavor with the aim of industry in achieving maximum production at minimum cost; to contain rules and regulations for the prevention and control of occupational disease; to consider the hygiene of both the working place and the individual; to provide a legal interpretation of the codes and show industry how these rules can be met by good industrial hygiene practice; and other information that is pertinent and necessary to the practical application and administration of the code.

The Committee of the ACGIH that has been working on this model code released a draft several months ago that embodied the results of its deliberations and study to that date. Copies were sent to representatives of a cross-section of interest in industrial hygiene for review, comment, and criticism. These reviewers included industry, labor, insurance, the public, the professions and practices involved (medicine, industrial hygiene, and safety), and the members of the ACGIH. The selection of reviewers and conveyance of the draft were made in part directly by the ACGIH and in part by asking the American Standards Association to communicate with a group of interests of that Association's selection.