

YES, RCT, MAB

UU-0097 #73



INTERNAL CORRESPONDENCE

RECEIVED

OCT 28 1986

M. A. PATEL

South Charleston Technical Center
Engineering Department

Post Office Box 8361
South Charleston, WV 25303

DATE: October 24, 1986
TO: See Attached Distribution
COPY: See Attached Distribution
SUBJECT: Asbestos Sampling and Analytical Method

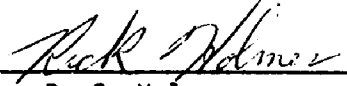
OSHA, in their recently promulgated asbestos standard, specified a mandatory Reference Method for the sampling and analysis of asbestos. Although this method is very similar to the NIOSH 7400 method, there are some important differences. After comparing these two methods, the following observations were made.

- 1) Counting Rules. NIOSH provides two sets of counting rules, A Rules and B Rules. OSHA requires that only the A Rules be used. Their rationale for this is (i) the A Rules have already been upheld in numerous court decisions, and (ii) changing to the B Rules would be inconsistent with the epidemiology upon which the standard was based.
- 2) Differential Counting. Method 7400 makes no attempt to do differential counting. That is, all fibers are to be counted even if it is obvious that the fiber is non-asbestos. The OSHA method also states that all particles with an aspect ratio of 3:1 or greater should be counted. However, OSHA's Salt Lake City Analytical Laboratory is not following this apparent requirement. A number of other sources also claim to be doing differential counting. Some UCC locations are excluding obvious non-asbestos fibers, others are not. There are positive and negative factors with both approaches. In either case our counting procedures need to be made consistent. Your comments on this issue would be appreciated.

What is a obvious non-asbestos fiber?

~~Any Comments?~~ There is no way you can differentiate non-asbestos fibers using the current technology. If someone is trying to do differential counting - I wonder how they do it? We feel all fibers should be counted.

So far, these are all of the significant differences I observed between the OSHA Reference Method and NIOSH 7400. Please let me know if you have noticed any others. All of these factors will be taken into account for the Volume 38 method now in progress.


R. S. Holmes

RSH/cgs
Attachment
2274C

DISTRIBUTION

TO: W. J. Aaron, 306
D. Boggs, 380
J. N. Dermitt, 510
J. E. Fear, Weston Canal Center, NJ
T. Grittie, 380
T. E. Hanning, 511 (2000-3312)
J. D. Keough, 312
F. Lutz, 525
K. E. Martin, 515
L. G. McMullen, 510
I. McNaughton, Prentiss
R. D. Ondocsin, 0500
M. A. Patel, 511 (701-330)
S. E. Robinson, 519
M. Sauro, 583
B. Sylvester, 312
J. Tiernay, 509
J. B. Tomlin, 985
E. G. Trawick, 511 (740-4318)
P. Venki, 581
W. J. Vincent, 514
A. P. Yalcinkaya, 515
L. W. Youngblood, 512

CC: I. P. Blackwood, 509
J. R. Clayton, 515
V. D. Dutcher, 863
D. Fysh, 503
D. A. Gosselin, 514/82
V. H. Johnkoski, 514
P. R. Kavasmaneck, 511 (2000-3235)
J. A. Leonard, 985
J. B. Leverton, 515
C. P. Maxwell, 511 (701-256)
J. E. Neff, 511 (740-4326)(2)
J. D. Nicol, 0500 (P2617)
T. P. Raby, 511 (3005-247)
A. M. Robertson, Prentiss
C. R. Rotthoff, 514/82