UNION CARBIDE

November 9, 1972

Mr. Frank X. Worden
Environmental Health Consultant
Western Electric Company
222 Broadway
New York, New York 10038

Dear Frank:

Many thanks for sending me the letter from Gerard Scannell. It will be very helpful to refer to this letter to answer questions concerning asbestos exposure.

I was also interested to notice the last paragraph in which he says that the same approach may not necessarily be followed for other chemicals or physical agents.

Best regards,

John J. Welsh, M.D.
Corporate Medical Director

JJW:BA

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SEP 7 1972

U.S. DEPARTMENT OF LABOR
Occupational Safety and Health Administration
WASHINGTON, D.C. 20210

September 1, 1972

Mr. V. J. Meyers, Manager
Environmental Health and Safety
Administration
Western Electric
222 Broadway
New York, New York 10038

Dear Mr. Meyers:

This is in reply to your letter of July 13, 1972 to Mr. Chain Robbins, Deputy Assistant Secretary of Labor.

Medical examinations are required for all employees engaged in occupations regularly exposed to airborne concentrations of asbestos dust. This would not apply to employees who are engaged in other occupations, even though they may occasionally, and momentarily, enter an area where there are operations involving the use of asbestos.

We do not at this time know specifically which levels of asbestos fibers above zero exposure will not produce mesothelioma, lung cancer and abdominal neoplasms. The medical examinations are appropriate in order to determine most effectively whether the health of employees is adversely affected by this exposure.

This approach may not necessarily be followed for other chemicals or physical agents where dose-response relationships are better defined. Standards may be established where medical examinations may not be required below specified exposure levels exceeding zero exposure.

Sincerely,

GERARD F. SCANNELL
Director
Office of Standards

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AUG 8 1972

U.S. DEPARTMENT OF LABOR
Occupational Safety and Health Administration
WASHINGTON, D.C. 20210

August 2, 1972

Mr. V. J. Meyers
Manager, Environmental Health
and Safety Administration
222 Broadway
New York, New York 10038

Dear Mr. Meyers:

Your letter of July 13, 1972 has been processed by the Office of Standards, and a technical response prepared. Such responses must receive legal clearance by the Office of the Solicitor. The response has been forwarded for consideration and a final response will be forthcoming upon such clearance.

Sincerely,

John P. O'Neill

JOHN P. O'NEILL
Chief, Division of General
Industry Standards

033093

Frank Wo...

July 13, 1972

MR. CHAIN ROBBINS, Deputy Assistant Secretary
Occupational Safety and Health Administration
Department of Labor Building
14th Street and Constitution Avenue, N.W.
Washington, D.C. 20210

Dear Chain:

I read with interest the "Standard for Exposure to Asbestos Dust" published in the June 7, 1972 issue of the Federal Register. Since this is the first OSHA standard promulgated by the procedures of Section 6 (b) of the Act, I have a few philosophical questions that have been bothering me.

The first question is concerned with the basis for the medical examination program, page 11319, column 2, paragraph numbered 5. I interpret this to mean that every employee working where environmental monitoring results reveal any airborne asbestos fibers must have a medical examination at the beginning, annually, and at the termination of his asbestos exposure, regardless of the degree of exposure. Is this a correct interpretation?

You and I know that many interpretations have been given to Threshold Limit Values (TLV). The foundation for some TLV's has been established to protect employees from toxic effects, some are guidelines to protect employees from potential irritants and some are simply standards of good practice. Proper utilization of these guidelines and good medical judgment have formed the basis for many medical surveillance programs. However, if I have properly interpreted this standard, the philosophy apparently behind the medical program for personnel exposed to asbestos does not warrant a combined engineering-medical judgment. Do you think that any level of exposure above zero will be the basis for medical examination programs associated with future standards being developed by OSHA and NIOSH?

I wish you would share your thoughts with me. If you can find time to phone me, I would appreciate hearing from you.

I hope to see you soon.

Sincerely,

Original Signed By
V. J. Meyers

FW:jm
Blind copy to:
J. P.Dunn, M.D.
W. W. Evans

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