file: Asbestos Task Force

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Organization Resources Counselors, Inc.

Memorandum

April 7, 1988

To: ORC Asbestos Task Force

From: Darrell K. Mattheis

Subject: 15-Minute Samples for Compliance with the OSHA Asbestos Standard

At the February 25, 1988 meeting of the Asbestos Task Force, the problem of collecting samples during short duration jobs was discussed in some detail. During the meeting it was agreed that ORC would contact OSHA and determine its attitude toward the use of a modified sampling technique to collect an accurate 15-minute sample.

The Task Force agreed on three approaches by which to approach the problem:

1. Varying the sampling method by either increasing the pump flow rate (to 5 liter/min.), increasing the maximum number of fields counted, or decreasing the minimum fiber yield per air sample;

2. Analysis based solely on the number of fibers collected, regardless of the sampling time;

3. Leaving the pump running after the task is completed in order to obtain a minimum 30-minute sample.

Of these three, the first two options were decidedly the preferred.

I discussed these three approaches with several individuals in OSHA Health Standards, Technical Support and Compliance. The folks in Compliance thought that a change in the sampling method from that published in the Asbestos Standard would have to be approved first by Technical Support and Health Standards.

Technical support deferred to Health Standards, who said that they would not make a decision on it until after they had responded to the Court Remand on developing a STEL for asbestos. OSHA received the actual remand from the court during the week of

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March 28,1988 and it will try to publish a STEL within the sixty day time period set by the court. Therefore, it will probably be the first week of June, 1988 before the asbestos STEL will be published.

I believe that the reason OSHA is unwilling, at this time, to make a decision on a fifteen minute sampling method, is that any data or correspondence it received would have to go in the Record, and might cause problems if it went to a 30-minute STEL.

The folks in OSHA Health Standards suggested that we select the method (s) that we think most accurate, let them look at it informally, and they will let us know if they think we are off base.

Therefore, I suggest that we do the following:

1. Select what we believe to be the best method.
2. Get opinions from the AIHA and NIOSH.
3. Select a method that meets their approval.
4. Let OSHA see the method we have selected.
5. If OSHA does not object, go forward with it.

Get Back To Me As Soon As Possible

We need to get moving on this, so I would like to have you get back to me as soon as possible with what you think is the best method for us to go with. Also, I would appreciate the names of any experts we could discuss it with. I will be looking forward to hearing from you soon.

Darrell K. Matthews

88-04-18

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Rick Milito
Is our position to increase the sample flow rate as appropriate to get a minimum sample volume? Let me hear from you.
Dana