

From L. L. RIPPEY

To DISTRIBUTION

PITTSBURGH OFFICE

1991 JANUARY 07

RE: ASBESTOS RULE - COMMENTS TO OSHA
Ref: Notice of Proposed Rulemaking for Occupational Exposure
to Asbestos etc. (55 FR 29712)

As you may be aware OSHA published a notice of proposed rulemaking on the asbestos standards in the 20 July 1990 Federal Register. Among other things this NPR proposed lowering OSHA's PEL for asbestos from 0.2 f/cc to 0.1 f/cc. There were many other important questions raised among them the expansion of negative air pressure enclosures and the competent person requirement to all asbestos renovation demolition jobs.

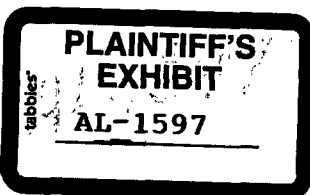
Alcoa participated with other industry representatives on the ORC task force to put together these comments to OSHA. We will keep you posted on the final changes to OSHA asbestos rules. Should you have questions in the interim, please contact the writer.

Laura L. Rippey

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File: Asbestos ORC Task Force

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November 30, 1990

Docket Officer
Docket H-033e
Occupational Safety and
Health Administration
200 Constitution Avenue, N.W.
Room 2625
Washington, D.C. 20210

Re: Notice of Proposed Rulemaking
for Occupational Exposure to
Asbestos, Tremolite, Anthophyllite
and Actinolite (55 FR 29712) July
20, 1990, Docket H-033-e

Dear Sir or Madam:

Organization Resources Counselors, Inc. (ORC) appreciates the opportunity to comment on the Occupational Safety and Health Administration's Notice of Proposed Rulemaking for Asbestos, Tremolite, Anthophyllite and Actinolite.

ORC sponsors an Occupational Safety and Health Group which is comprised of more than 100 companies from a wide range of industries and with employment size ranging from medium to large. All of these companies have a strong commitment to employee safety and health. The members of this group work with ORC on OSHA rulemaking activities and other aspects of employee safety and health. This statement, and the comments, which follow, are solely the responsibility of ORC and may differ from comments submitted by member companies.

ORC supports OSHA's efforts to make its Asbestos Standard both more protective and effective. Asbestos is present in virtually every workplace in one form or another, and it must often be dealt with in the normal course of business. Regulations should be designed with the goal of preventing unacceptable employee exposures during the handling, removal and disposal of asbestos. Properly written, such regulations can save lives and prevent needless illness; poorly done, regulations can be extremely costly with only small improvements in worker health and safety.

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