FILE NAME: Rockwell (RCK)

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Rockwell International

600 Grant Street
Pittsburgh, Pennsylvania 15219

December 5, 1975

DOCKET OFFICE

Docket Officer
Docket H-033
U. S. Department of Labor
Room N-3620
200 Constitution Avenue, N.W.
Washington, D.C. 20210

Dear Sir:

Pursuant to your request for comments on the proposed standard for occupational exposure to asbestos, published in the Federal Register, October 9, 1975, the following response is made on behalf of Rockwell International Corporation.

Rockwell manufactures brake assemblies for highway and off-highway vehicles. In the manufacture of these units brake linings containing asbestos must be processed. These linings are bored, rivetted and subsequently ground to specified dimensions. At present, local exhaust ventilation systems are utilized to ensure that employee exposures to airborne concentrations of asbestos fibers remain below the current permissible limit of 5 fibers/cc.

As provided in the current standard, 1910.1001 (b)(2), the permissible limit is to be reduced to 2 fibers/cc, effective July 1, 1976. Our activities have been directed towards achieving this level by modification of our processes and elimination of as many dust producing activities as possible. With the proposed reduction in permissible exposure to an even lower limit, 0.5 fiber/cc, a redirection of these efforts will be required in an attempt to achieve this 10-fold reduction in acceptable levels. Accordingly, we request that the effective date for lowering the permissible limit be set no earlier than July 1, 1977.

With respect to 1910.1001 (9)(3)(iv) which provides for job re-assignment of personnel found unable to utilize respiratory protective equipment, we submit that this is

not appropriate for regulation. This issue is more appropriate for individual company policy determination or as a bargaining issue, both within the constraints of the handicapped provisions of federal law.

We respectfully request that consideration be given to these comments in the final rulemaking procedures.

Sincerely,

John Maciejczyk

John Maciejczyk, Director
Safety & Environmental Health

JM:ls