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February 15, 1984

To: Health and Environmental Affairs Committee

Subject: Occupational Safety and Health Administration (OSHA) Draft Report  
on the Asbestos Standard Prepared For An OSHA Advisory Committee  
On Construction Safety and Health

We are enclosing a draft copy of a document prepared by OSHA which is marked on each page: "This draft is not final and bears no official endorsement. It should not be reproduced..." In addition, we are enclosing a document by the National Institute of Occupational Safety and Health (NIOSH) on a revised method for counting asbestos fibers. I've attached a Table of Contents for the draft OSHA document. Please note that I have not included pages 56-78 of that document, as they apply to the Construction Industry. Except for these pages, the document is complete.

These papers relate to the comments that the Institute may make once the Notice of Proposed Rulemaking on the asbestos standard is released in the Federal Register. These may help Committee Members in organizing their comments for any near-term meeting of the Committee.

Major items of concern and possible comment could be:

1. The feasibility of a 0.5 fiber per cc standard.
2. The feasibility of reducing the ceiling (peak) PEL from 10 fibers per cc to possibly 3 fibers per cc.
3. An action level of 0.2 fibers per cc (rather than 2 fibers per cc) to trigger certain control techniques.
4. The reliability of fiber counts in the 0.1 to 1.0 fiber per cc range with optical microscopy.
5. Tighter rules on regulated areas.
6. Respirator use as a control technique.
7. Changes in protective clothing, medical surveillance, hygiene facilities, signs and labeling, and recordkeeping.

These documents are sent for your review at this time. When the notice is published in the Federal Register, I expect to get back to you on a Committee Meeting to prepare comments.

E. W. Drislane  
Executive Director

EWD/dr  
Enc.

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