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Assistant Secretary of Labor
Occupational Safety and Health Administration
U. S. Department of Labor

Director, National Institute for
Occupational Safety and Health

Reopening of Asbestos Standard

This refers to Mr. Gerard F. Scannell's memorandum subject as above, and my interim response thereto, dated January 7, 1974. The question as to the appropriateness of the present standard has been reviewed and commented on by a number of our professional staff, and there does appear to be sufficient biological and engineering reason for reevaluating the asbestos standard.

Most of the comments have been directed to the method of sampling and analysis of asbestos, and the deficiencies in available methods. These deficiencies include the lack of specific identification of the fiber and the tediousness of the present counting procedure. Work is being actively pursued to overcome the problems with the present analysis, but this work has not progressed to the point that a new method can be recommended. Drafts of two technical reports, TR-92, an evaluation phase contrast microscopy for asbestos counting, and TR-84, a description of the present recommended method, are enclosed for your information.

Our investigation has not included a thorough search for and evaluation of new, published literature on asbestos; however, we assume that a fair amount of work, that may have biological significance, has probably been accomplished since NIOSH prepared the Asbestos Criteria Document. To undertake a reevaluation of the criteria on which we based our recommendations, would require a significant expenditure of resources. Consequently, I would propose that before any decisions are made, that the priority for such a review be determined jointly by OSHA and NIOSH. If such a course would appear appropriate, I would suggest your staff contact Mr. Vernon E. Rose, Director of the Office of Research and Standards Development to discuss the next step.

Marcus H. Key, M.D.
Assistant Surgeon General

Enclosures

NIOSH:ORSD:MKKey:mjh:3/25/74
Official file located in room 318.