respirators, monitoring and physical examinations, citations, OSHA inspections and employee notification. In the second letter, the AIA distinguishes between non-locked-in asbestos containing products and locked-in asbestos products (which would be brake lining and clutch facings). There are certain labeling requirements tied in to the non-locked-in containing asbestos products, but this letter also discussed the problems of subsequent working of locked-in asbestos containing products.

The members discussed some of the items in the OSHA regulations. One member indicated that during an inspection, there were 3 OSHA people at their plant for 7 to 8 days. Interestingly, the 3 OSHA people came on site the first day wearing respirators. Whether this was for effect or is a standard procedure for OSHA was not known. One of the items pointed out by an OSHA inspector on the scene was the dry sweeping of loose asbestos-type compounds vs. the wet sweeping or vacuum cleaning that OSHA calls for. Another member advised that they had taken out all air hoses around briquette presses and other machinery where loose asbestos is handled before it becomes locked in. Surprisingly to some members, asbestos sampling indicated that the inspection and drilling locations were problem areas. One member required that the respirators be worn at all drilling locations.

In an inspection at one member's plant, the OSHA people set up 5 stations and while 4 of them sampled below the 5 fiber per cc TWA, one station read 18 fibers per cc TWA. This member was cited (in averaging the readings).

When the Federal Government was considering the necessity for asbestos regulations, two of the companies represented by Members on the Committee were asked to cooperate in a survey by NIOSH. This study by NIOSH was to check over medical records and other such items to attempt to put the problem in prospective. NIOSH had indicated to the cooperating manufacturers that the information they were providing would be kept confidential. However, as it turns out, the OSHA people have copies of the NIOSH studies which would indicate that the confidentiality has been violated.

A member questioned what happens when the asbestos concentration in a work area exceeds 10 fibers per cc (the ceiling concentration in the OSHA regulations). The answer is that the employer must notify the worker so exposed, in writing, that he was exposed to such a concentration and the worker must wear a respirator in that area. The next question concerned what the proper means for notification of the worker would be. If an interpretation is officially asked of OSHA, they will indicate that a registered letter to the employee is the proper means of notification. In other areas, OSHA has indicated that meeting the spirit of the law is what counts and it is felt that bulletin board notification would suffice.

The next question concerned respirators. It was indicated that there were 3 disposable respirators approved by the Bureau of Mines, and these are manufactured by the A. O. Smith Company, Welsh, and Minnesota Mining and Manufacturing (MMM). Respirators furnished employees must have a proper fit and the employees must be instructed both as to the fit and the servicing of the respirator. Responsibility for testing and approval of respirators for protection against asbestos dust recently was transferred from Bureau of Mines to NIOSH. Until NIOSH approvals are issued, it is recommended only respirators (reusable or disposable type) having Bureau of Mines approval specifically for use on asbestos dust be used in asbestos contaminated atmospheres.