

UNIROYAL, Inc.

OXFORD

(Location)

November 18, 1975

TO: D. E. Dudrow
FROM: L. F. Dieringer
SUBJECT: ATI Work Session on Proposed Revision to OSHA Asbestos Standard.

On November 13, 1975, the Asbestos Textile Institute met at Stouffer's National Center Inn, Arlington, Virginia, to discuss the position that ATI would take in regard to the proposed revision to the OSHA Asbestos Standard.

In attendance were:

Amatex Corporation -- J. L. Rainey; M. J. Scanlan
Carlock Inc. -- S. G. Dixit; A. Kuzmuk
Johns-Manville Corporation -- D. H. Markusson, Esq.
Raybestos- Manhattan, Inc. -- I. H. Weaver; W. Krucke; M. Q. Scowcroft
Southern Asbestos Company -- E. C. Bratt; L. E. Moody
Uniroyal, Inc. -- B. E. Carden; E. A. Morris; L. F. Dieringer; S. Peale
Legal Counsel -- W. B. Alcorn, Jr., Esq., Cadwalader, Wickersham & Taft
Guest -- R. H. Mereness, Executive Director, Asbestos Information
Association/North America
-- K. Verrill, British Belting and Asbestos Company, Great Britain

After considerable discussion, it was agreed that the ATI initial response will be a general objection on the basis of the lack of technological feasibility in the asbestos textile industry to comply with the 0.5 fiber per cubic centimeter permissible exposure limit in the proposed revision. This is to be submitted by the December 8, 1975 deadline. The Asbestos Information Association has asked for 120 day extension to this deadline and expects at least a 60 day extension. Further specific response to other objectionable sections of the proposed revision as well as impact statements, will be prepared for the hearing expected at a later date.

Mr. Mereness, Executive Director of the Asbestos Information Association, stated that in all probability it will be six months before the government economic study will be ready and a year before promulgations of a revised standard. He indicated that the British medical data upon which the proposed fiber reduction is based, was incomplete and that an AIA sponsored medical group was going to review the data and comment upon OSHA's interpretation of the data.

J. D. Forbes
LFD/df

cc: J. D. Forbes, M.D.

PLAINTIFF'S
EXHIBIT

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EXHIBIT

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