

file: ORC Asbestos Task Force

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REC'D APR 11 1988



Memorandum

PLAINTIFF'S
EXHIBIT
AL-929

March 31, 1988

To: ORC Occupational Safety and Health Group
ORC Asbestos Task Force
ORC Respirator Task Force

From: Darrell K. Mattheis and Rebecca L. Daiss

Subject: D.C. Appeals Court Decision Regarding Respirator
Requirements in the Asbestos Standard (CFR 1926)

In its February 2 ruling, the D.C. Court of Appeals told OSHA that it must reconsider requiring the use of supplied air respirators to achieve levels lower than the Permissible Exposure Limit (PEL) set for Asbestos. As a consequence of this ruling, it is possible that OSHA may revise the Asbestos Standard to require that Self Contained Breathing Apparatus (SCBA) or other Supplied Air Respirators (SARs) be used in every instance (i.e., prohibit the use of negative pressure respirators).

The ORC Asbestos Task Force believes strongly that the increased cost and the increased risk of compliance with such a provision cannot be justified. The group decided to compile information to support this position and submit it in comments to both OSHA and OMB.

ORC is, therefore, requesting that companies, which may be affected by such a revision of the respirator provisions, send us information on the following:

1. The cost of equipping employees with Atmosphere-Supplying Respirators (SCBAs and Airline Respirators) to replace negative pressure respirators currently being used;
2. Cost of training employees in the use of Atmosphere-Supplying Respirators;
3. Cost of storage and maintenance of additional Atmosphere-Supplying Respirators;

The attached form has been provided for ease of entry and compilation of data. Please complete the form as accurately as possible and return it to ORC. We believe that it is in industry's best interest to provide OSHA and OMB with data on the probable consequences of allowing only the use of supplied air respirators.

We would like to receive the completed questionnaire by the end of May, 1988.

Danell K. Mattheis

BD/3A

Rebecca L. Davis

Please return to:

Rebecca L. Daiss
Organization Resources Counselors, Inc.
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1331 Pennsylvania Avenue, N.W.
Washington, D.C. 20004

ORC SUPPLIED AIR RESPIRATOR QUESTIONNAIRE

The purpose of this questionnaire is to estimate the cost to industry of replacing all negative pressure respirators with Atmosphere-Supplying Respirators (SCBAs and/or airline respirators) for work involving Asbestos.

1. Approximately how many Atmosphere-Supplying Respirators will your company need to purchase to replace all negative pressure respirators currently being used for work involving Asbestos? (If unable to supply information on the entire company, identify type of unit for which you are providing information, e.g., a division within the corporation.)

2. What is the estimated cost of replacing negative pressure respirators with Atmosphere-Supplying Respirators for work involving Asbestos? (Number provided in question 1, times cost per respirator.)

3. What is the estimated additional cost of training workers, who had previously used negative pressure, in the use of Atmosphere-Supplying Respirators for work involving Asbestos? (For the unit identified in question 1.)

4. What is the estimated cost of storage and maintenance of additional Atmosphere-Supplying Respirators for work involving Asbestos? (For the unit identified in question 1.)

5. Any additional comments you wish to make:

