Washington, DC 20006
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Organization Resources Counselors, Inc.

June 6. 1983

Thorne G. Auchter
Assistant Secretary of Labor for
Occupational Safety and Health
Occupational Safety and Health
Administration
200 Constitution Avenue, N W.
Washington, D.C. 20210

Dear Mr. Auchter:

It is widely recognized that exposure to asbestos fibers can be a significant source of risk to American workers. There is no known threshold for "safe" exposure to asbestos. Also, there are convincing data and research studies that document the nature of the risk associated with such exposure. Organization Resources Counselors, Inc. (ORC) thinks that the present standard of two fibers per cubic centimeter is inadequate to protect workers and that prompt consideration is needed to reevaluate the existing standard. OSHA needs to reconsider the permissible exposure limits and other criteria in accordance with current state-of-the-art knowledge of the risk associated with exposure to asbestos.

ORC is recommending an eight hour time weighted average airborne concentration not to exceed 0.5 fibers per cubic centimeter. ORC further recommends that for most of general industry, compliance be achieved over a period of 12 months from the effective date of the standard and that the asbestos producing and manufacturing industries reduce permissible exposure limits to one fiber per cubic centimeter within one year and to 0.5 fibers per cubic centimeter within four years. The bases for these recommendations and other suggested criteria are included in the attached ORC recommended standard. The ORC position is submitted recognizing that other countries, organizations, and individuals have different opinions and recommendations regarding this most complex subject. I encourage you to carefully consider all information submitted to OSHA.

The ORC recommended exposure limits take into consideration the difficult problems associated with the monitoring, collection, and analysis of airborne levels of asbestos. In reaching its

decision. OSHA must take into account that the difficulty of monitoring and measuring the amount of airborne asbestos impacts significantly on the integrity of the permissible exposure limit. Also, the final limit selected by OSHA (within reasonable limits, say 0.5 or 0.1 fibers per cubic centimeter) will not significantly alter the actual level of protection provided to American workers.

ORC is also concerned about the lack of adequate testing and certification of respirators worn by workers exposed to asbestos fibers. While our recommendations emphasize the importance of having a fully integrated program to deal with asbestos in the workplace, respirators must inevitably be used in a large number of workplaces to protect employees against exposure to airborne asbestos fibers.

In conclusion, ORC applaudes OSHA's efforts to strengthen its asbestos standard. ORC is submitting recommendations, which represent the opinions of ORC only, as an aid to OSHA so that it can reach reasonable and responsible decisions on this real and complex issue.

Sincerely yours,

Richard F. Boggs

Richard F. Boggs, Ph.D.
Vice President

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Enclosure