

prohibitions on tobacco and chewing products, and food in regulated areas. OSHA expects that strict compliance with these provisions will virtually eliminate several sources of asbestos exposure which substantially contribute to increased body burden.

Several of these facilities and practices are presently required under current OSHA standards for General Environmental Controls in Subpart J of 29 CFR Part 1910. For example, § 1910.141(e) requires the employer to provide change rooms with separate storage facilities for street and work clothing, and section 1910.141(g) requires the employer to prohibit the consumption of food and beverage in areas where there is exposure to toxic substances. The provisions of this standard are intended to augment Subpart J with additional requirements which are specifically applicable to asbestos exposure and to consolidate all related provisions under one standard. Many firms affected by this standard have already instituted facilities similar to those required in the final standard [Exs. 90-174, 93-7, 238A, 328; Tr. 7/9, p. 269].

The final standard like the existing standard reiterates specifications in section 1910.141 pertaining to the type of change room an employer must provide and the requirement that the employer prohibit the consumption of food and beverages in areas where there is exposure to toxic substances. OSHA believes it is essential that employees have separate lockers or storage facilities for street and work clothing to prevent cross-contamination between the two. This provision coupled with showering and the prohibition on wearing work clothing home will minimize employee exposure to asbestos after the work shift ends because it reduces the period in which work clothes coated with asbestos may be worn.

The final standard, unlike the existing standard, requires employers to assure that employees exposed to asbestos during their work shift shower before leaving the plant and do not leave wearing work clothing. Showering reduces the worker's period of exposure to asbestos and removes asbestos which accumulates on the skin and hair. Employees are not permitted to leave the plant wearing work clothes, because this practice would negate any advantage gained by showering. Work clothing that does not leave the workplace as well as showering serve as significant steps in reducing the movement of asbestos from the workplace and provides added

protection to employees and their families.

The final standard requires employers to provide persons working in asbestos areas with filtered air lunchrooms which are readily accessible. Employers must also assure that employees wash their hands and face prior to eating or smoking and do not enter the lunchroom wearing protective clothing, unless cleaned beforehand. OSHA feels it is imperative that employees have a clean place to eat, free from the toxic substance with which they work all day. Filtered air lunchrooms will reduce employee exposure by limiting contamination by asbestos.

Employees are required to wash before eating to further minimize the possibility of food contamination and reduce the likelihood of additional exposure from loose asbestos dust. To further insure minimal worker exposure, protective clothing must either be removed or cleaned before entering the lunchroom. Instead of requiring a particular method, employers are given discretion to choose any method for removing surface asbestos which does not disperse the fibers into the air.

The hygiene provisions in the final standard are necessary and appropriate to protect employees within affected industries from unwanted and dangerous exposure to asbestos not necessary to job performance. Few, if any, participants in the rulemaking denied the benefits afforded by these provisions.

10. Paragraph (j). Communication of hazards to employees.

Signs and labels

The final rule for asbestos requires that legible caution signs be posted at each regulated area where occupational exposures could exceed the PEL. Signs must also be posted at all approaches to areas containing excessive concentrations of airborne asbestos fibers. These signs are to bear the following information:

**DANGER—ASBESTOS; CANCER AND LUNG DISEASE HAZARD;
AUTHORIZED PERSONNEL ONLY;
RESPIRATORS AND PROTECTIVE CLOTHING ARE REQUIRED IN THIS AREA**

OSHA intends the posting of these signs to serve as a warning to employees who may otherwise not know they are entering a regulated area and as training reinforcement, to encourage proper work practices and personal protective equipment use. Such warning signs are required to be posted whenever a regulated area exists, that is, wherever occupational exposures are

likely to exceed the PEL. For some work sites, regulated areas are permanent, for example, in areas where engineering controls cannot reduce exposures to or below the PEL. In such situations, signs are necessary to warn employees not to enter the area without adequate respiratory protection and unless authorized to do so.

Warning signs are also required to designate temporary regulated areas, e.g., when maintenance or repair activities create a situation where occupational exposures could exceed the PEL. Warning signs are important in this situation because they will help to prevent the unnecessary exposure of employees who may not be aware that an area temporarily contains high levels of asbestos.

The final standard is not substantially different from the present OSHA standard. The section on sign specifications simplifies the sign requirements and eliminates unnecessary detailed specifications (i.e., letter sizes and styles, spacing between lines) in favor of a more performance-oriented approach. The new specification contains a very clear warning regarding the "cancer hazard" of asbestos, which is more strongly stated than the one presently required. This reflects the information gained since the promulgation of the existing standard on the serious cancer risk posed by exposure to asbestos.

OSHA has added the word "danger" for three reasons: (1) To attract the attention of workers; (2) to alert workers to the fact that they are in a dangerous area; i.e., an area where they are exposed to a potential carcinogen; and (3) to emphasize the importance of the message to follow. Additionally, the appearance of the phrase "cancer and lung disease hazard" on the warning sign assures that employees are actually being informed of this hazard. Lastly, it is believed that the addition of the phrase, "authorized personnel only" will serve to limit access and activities within regulated areas.

As indicated above the final standard requires the warning of "cancer and lung disease hazard." OSHA believes that it is important, and indeed section 6(b)(7) of the Act requires, that appropriate forms of warning, as necessary, be used to apprise employees of the hazards to which they are exposed in the course of their employment. OSHA believes, as a matter of policy, that employees should be given the opportunity to make informed decisions as to whether to work at a job under the particular working conditions. Furthermore, OSHA believes that when the control of