

Written comments concerning the proposal must be submitted in quadruplicate:

Docket Officer, Docket H-033
US Department of Labor, Room H3620
200 Constitution Avenue N.W.
Washington, D.C. 20210

The question was asked as to what would be the most effective means of communicating with Washington to indicate the problems with this new numerical standard. Should the Institute comment? Should the individual members comment? It is not enough for the manufacturer to feel his views will be represented to the regulators by the Asbestos Information Association or FMSI. It was suggested that it would be best if both the Institute and individual members respond with points that are particular to their factories. It is felt that participation by the small manufacturer will be most meaningful. The Asbestos Study Committee will review the proposed standard and note some of the points that members may wish to comment on. It should be pointed out that even if members comment to the effect that they support the AIA comments or they support the FMSI comments, at least they will be on record espousing their viewpoints.

A comment was made to the effect that everyone has been gearing to get their concentrations down to the 2 fiber/cc limit by July 1, 1976. The technology necessary to take the count down to 0.5 fiber/cc is not known. How can comments be made on the cost impact, effects on competition, effects on employment, effects on energy supply, when the technology for getting to the 0.5 fiber/cc is not even known at this time? The least that can be done is to request an extension of time for comments past December 8, 1975. Upon motion duly made, seconded, unanimously passed it was

RESOLVED: That the Institute will request the Department of Labor to delay the cut-off date for comment on these proposed amendments to April 1, 1976.

The friction materials industry does not know whether the 0.5 fiber/cc limit can be reached. Perhaps it will be necessary to go to materials with a material cost ten times that of asbestos in order to get the work place down to the proposed level. Industry is confronted with requirements for Standard 121 and Standard 105-75 from the National Highway Traffic Safety Administration with stringent friction materials requirements at the same time that they must evaluate whether they can still use asbestos in their products.

There are several points in the OSHA standard besides the 0.5 fiber/cc limit. However, the main problem is the 0.5 fiber/cc limit. Some of the comments to follow concerned new problems that may arise as a result of this proposed standard. These problems will be pointed out to the members so that they can look at these from their viewpoints with the aim of advising Washington on their individual problems with this standard.

The reduction of the limit to the 0.5 level is going to effect processors such as the re-builder and the garages who were not really included in this standard before. Any outfit that handles friction materials may very well find airborne concentrations of asbestos fibers that exceed the 0.5 fiber/cc level. For example, a junk yard which might have a