

IN RE: ABRAMS
November 1992

Excerpt from "Technological Feasibility and Economic Impact of OSHA Proposed Revision to the Asbestos Standard" prepared by WESTON Environmental Consultants.

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With verification still required in the secondary and consumer segments of the industry, it now is possible to conclude:

1. That it is not technically feasible for any segment of the asbestos industry to meet a 0.5 fiber per cc (TWA) exposure level.
2. That the primary producers can, at substantial cost, within three to five years meet the 2 fibers per cc (TWA) standard.
3. That large portions of the secondary and consumer segments of the industry cannot economically (and perhaps cannot technologically) meet the 2 fibers per cc (TWA) standard without the option of using personal protection as their primary mode of compliance, particularly when they must shoulder the pass-through costs of "best available technology" (BAT) in the primary sector.
4. That the enforcement, without exceptions, within the secondary and consumer segments of the industry, of the July 1, 1976, 2 fibers per cc (TWA) standard, and, a fortiori, a change in the standard to any lower level, will lead to undesirable concentration within the industry.
5. That, because the projected construction industry regulation inevitably will have a profound economic impact upon segments of the asbestos manufacturing industry, we cannot intelligently comment upon the economic impact of the proposed manufacturing regulation separate and apart from the economic impact of the projected construction regulation.

We believe, in short, that the most serious problems raised by the regulation proposed on October 9, 1975 lie in its potential impact upon the secondary and consumer segments of the industry....



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