

December 12, 1975

to the above, new information has been forthcoming within the United States on the toxic effects of asbestos. To put it succinctly, the data indicates that at exposure levels of 2 fiber/ml. and above, deaths on the order of 10-11% from neoplasms can be predicted.

Based on the research data accumulated internationally to date, we do not feel that the 0.5 fiber/ml. standard is unreasonable, nor do we concur that the asbestos industry, product manufacturing in particular, has been singled out as a scapegoat or "whipping boy." Intensified attention to physical and chemical agents in the work environment will inevitably encroach into the various segments of industry. We cite as an example the hue and cry surrounding the vinyl chloride exposures of two or three years ago which developed after revelation by B. F. Goodrich of three known deaths from angiosarcoma. OSHA proposed a permissible 8-hour exposure limit of PPM which is for all intents and purposes a "no detectable limit." The petrochemical industry protested vigorously and accused OSHA of acting prematurely without valid evidence or substantiating data. Despite the protestations which in no way refuted the toxicological findings, vinyl chloride was assigned as a human carcinogen, and the PPM permissible limit was sustained. It is interesting to note that since adoption of the standard, the petrochemical industry, with the major producers taking the initiative, are successfully eliminating this serious exposure source.

It is our contention that reduction of asbestos exposures by Abex to comply with the 0.5 fiber limit is not a multi-million dollar program and will definitely not require scrapping or replacement of all existing exhaust systems as asserted in previous correspondence. An excellent start has been made in Book Preform where the exhaust systems are well designed as they are based on the concept of total enclosure. Although air sampling has not been conducted in the department since installation of the systems, it is likely that exposure levels will approach or fall within the 0.5 fiber limit. If excursions are observed, they can be reduced through improved housekeeping and possible enclosure of the mix buggies. The remaining exposures

SPNY 003475