



Xerox copy -
J.P. McFarland
J. Himmelfarb

FYE

llg

9/23/88

Copy to Jim Buckle

Jim
be sure that our
maintenance personnel are
properly protected when they
do repairs. J. 9/29/88

Current Report

Asbestos

SIGNIFICANT RISK TO BE FURTHER REDUCED UNDER 1 F/CC EXCURSION LIMIT SET BY OSHA

Workers in construction and general industries will be further protected from risks posed by exposure to asbestos under a limit set by the Occupational Safety and Health Administration to eliminate short bursts of high exposures to the substance, the agency announced Sept. 14 (53 FR 35610).

The new excursion limit, contained in amended final asbestos rules published by the agency, is expected to benefit about 36,000 workers who are exposed to asbestos below the current permissible exposure limit over an eight-hour period, but who experience high short-term exposures.

Workers expected to benefit most from the amended rules include those exposed to frequent, but short-term bursts rather than continuous levels of asbestos, the agency said. Workers in this category include those employed in asbestos removal and repair in the construction industry, installation of new construction materials involving drilling and sawing pipe and sheet material, installation of asbestos-cement pipe, and brake repair.

The amended rule limits asbestos exposures averaged over a 30-minute sampling period to 1 fiber per cubic centimeter of air.

OSHA estimated that the excursion limit will save 118 lives among workers with lifetime exposures to asbestos and 79 lives among workers exposed to the substance for only 20 years.

After reviewing the record developed for the promulgation of 1986 asbestos standards for construction and general industries, OSHA determined that asbestos exposures under the new standards still posed a significant risk of material impairment to workers. The review was prompted in part by a February federal appeals court order (13 OSHC 1561).

The preamble to the amended final rules appears in the Full Text section of this issue. The rules will appear in a future Reference File supplement.

No Challenges Expected

Edward W. Warren, an attorney with the Washington, D.C., law firm of Kirkland & Ellis and counsel to the Asbestos Institute and the Asbestos Information Association/N.A., said that he had not yet reviewed the amended standards. The action, however, had been expected and was not opposed, he said, adding that no legal challenges to the action are anticipated. AIA Executive Director B.J. Pigg agreed, noting that implementation of a short-term limit was one issue on which both industry and labor agreed.

The U.S. Court of Appeals for the District of Columbia Circuit ordered the agency in February to reconsider its decision not to adopt a short-term limit (17 OSHR 1371). The agency originally had contended that the rulemaking record failed to demonstrate the dose-rate response necessary to justify a short-term limit.

The decision to reconsider a short-term limit was reinforced by another appeals court decision in July 1986, involving the ethylene oxide standard, which held that the agency is compelled under the Occupational Safety and

Health Act to adopt a short-term limit if the rulemaking record shows that such a limit would further reduce a significant health risk and is feasible to implement regardless of whether a dose-rate effect is supported (12 OSHC 1905).

OSHA set a permissible asbestos exposure limit of 0.2 f/cc for construction and general industries in June 1986 (Reference File, 31:3116, 31:8121). The standards were challenged by two departments of the AFL-CIO.

Effective Dates

The rules go into effect Oct. 14, except for information collection requirements relating to the new excursion limit. Those requirements—including initial monitoring, periodic monitoring, written compliance programs, training, medical surveillance, and objective data records—will be submitted to the Office of Management and Budget for approval and an effective date will be announced later, OSHA said.

Comments on the information collection requirements, including suggestions for reducing burden hours related to the requirements, should be sent to the Office of Information Management, Room N-1301, U.S. Department of Labor, 200 Constitution Ave. N.W., Washington, D.C. 20210. In addition, comments should be sent to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, D.C. 20503.

For further information on the amended rules, contact James Foster, OSHA Office of Public Affairs, Room N-3647, U.S. Department of Labor, 200 Constitution Ave. N.W., Washington, D.C. 20210; (202) 523-8151.

Right-To-Know

OSHA HAZARD COMMUNICATION COMPLIANCE KIT FOR SALE IN GOVERNMENT PRINTING OFFICE

A hazard communication standard compliance guide prepared by the Occupational Safety and Health Administration

INDOOR AIR POLLUTION CONFERENCE

Occupational health problems posed by indoor air contaminants, and ways in which the federal government, states, unions, courts, and employers are grappling with these emerging concerns, will be addressed in "Sick-Building Syndrome. Problems and Prevention of Indoor Air Pollution," a national conference to be held by The Bureau of National Affairs, Inc., Nov. 1-2 in Baltimore. Leading experts will discuss the sources of indoor air pollution, regulatory and legislative initiatives, current liability suits, and the details of actual remediation efforts undertaken in three cases. The conference fee is \$450 for BNA subscribers, \$550 for non-subscribers. To register or obtain further information, contact BNA Conferences at (800) 424-9890, or (202) 452-4420 in the Washington, D.C., metropolitan area.

CTD001741



ASBESTOS INFORMATION ASSOCIATION

1745 Jefferson Davis Highway, Crystal Square 4, Suite 509
Arlington, Virginia 22202 • (703) 979-1150

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FEB 20 1987

February 18, 1987

Employee & Industrial Relations

Memorandum For: Distribution List

Subject: OSHA Asbestos Standards - Materials
Available to Comply With Employee
Information and Training Requirements

The U.S. Occupational Safety and Health Administration (OSHA) published revised asbestos standards for occupational exposures to asbestos in general industry and construction on June 20, 1986. Among the provisions of OSHA's revised standards is the requirement for employers to "institute a training program for all employees who are exposed to airborne concentrations of asbestos.... at or above the action level" and ensure that such employees participate in a training program. The employee information and training requirement became effective October 20, 1986.

The above requirement affects all employees who are exposed to concentrations of airborne asbestos at a level of 0.1 f/cc (action level) or higher; the revised permissible exposure limit was set at 0.2 f/cc. An identical excerpt from the two standards is enclosed and provides complete information regarding OSHA's employee information and training program.

In keeping with its principal organizational purpose regarding work in the scientific and educational area, this Association (AIA/NA) has revised its employee information pamphlet with special emphasis on incorporating as many of the specific requirements of OSHA's training program as practical. For example, AIA/NA's newest employee information pamphlet, "What You Should Know About Asbestos and Health," covers the potential health effects associated with exposure to asbestos, the relationship between smoking and exposure to asbestos in producing lung cancer, general information on use of respirators, protective clothing, and the purpose and description of medical surveillance. A copy of the pamphlet is enclosed.

As a convenience for interested companies, an order form is attached which lists the above-described pamphlet at a cost of .70¢ each plus mailing. In addition, the form includes a number of additional educational-information materials, including posters which promote good work practices and housekeeping when working with asbestos.

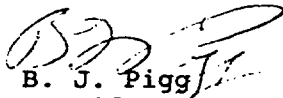
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Since employers are also required to make a copy of the applicable standard available to all affected employees, the two OSHA standards and complete preamble are available at a cost of \$10.00. Merely write "request OSHA standards" on the bottom of the order form above the signature line if you desire to receive this item. You will be subsequently billed for materials requested plus shipping costs (normally via UPS).

AIA/NA is pleased to be of assistance to the asbestos industry in meeting the OSHA requirements for an employee information and training program.


B. J. Pigg
President

Enclosures

DISTRIBUTION: AIA/NA Members
Interested firms not members of AIA/NA

CTD001743

(3) *Employee information and training.* (i) The employer shall institute a training program for all employees exposed to airborne concentrations of asbestos, tremolite, anthophyllite, actinolite, or a combination of these minerals in excess of the action level and shall ensure their participation in the program.

(ii) Training shall be provided prior to or at the time of initial assignment, unless the employee has received equivalent training within the previous 12 months, and at least annually thereafter.

(iii) The training program shall be conducted in a manner that the employee is able to understand. The employer shall ensure that each such employee is informed of the following:

(A) Methods of recognizing asbestos, tremolite, anthophyllite, and actinolite;

(B) The health effects associated with asbestos, tremolite, anthophyllite, or actinolite exposure;

(C) The relationship between smoking and asbestos, tremolite, anthophyllite, and actinolite in producing lung cancer;

(D) The nature of operations that could result in exposure to asbestos, tremolite, anthophyllite, and actinolite, the importance of necessary protective controls to minimize exposure including, as applicable, engineering controls, work practices, respirators, housekeeping procedures, hygiene facilities, protective clothing, decontamination procedures, emergency procedures, and waste disposal procedures, and any necessary instruction in the use of these controls and procedures;

(E) The purpose, proper use, fitting instructions, and limitations of

respirators as required by 29 CFR 1910.134;

(F) The appropriate work practices for performing the asbestos, tremolite, anthophyllite, or actinolite job; and

(G) Medical surveillance program requirements.

(H) A review of this standard, including appendices.

(4) *Access to training materials.* (i) The employer shall make readily available to all affected employees without cost all written materials relating to the employee training program, including a copy of this regulation.

(ii) The employer shall provide to the Assistant Secretary and the Director, upon request, all information and training materials relating to the employee information and training program.

TO: Asbestos Information Association/North America
1745 Jefferson Davis Highway
Arlington, Virginia 22202 • Phone (703) 979-1150

(Date)



Please forward the materials noted below. We understand that we will be billed for costs plus shipping charges, and that prices are subject to change without notice.

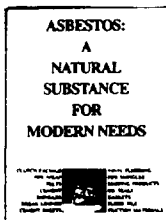
Handbook—"ASBESTOS—Federal & State Regulations" in three-ring binder.
\$50.00 each.

Quantity _____



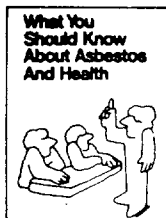
A monthly report of items of interest to the asbestos industry. \$75.00 per year to non-AIA/NA members.

Quantity _____



"Asbestos: A Natural Substance for Modern Needs" An overview of asbestos and current use in products. 5½ x 8½ \$.75 each.

Quantity _____



"What You Should Know About Asbestos and Health." Employee information pamphlet. 5"x7" \$.70 each.

Quantity _____

"Recommended Practices for Handling Asbestos Fiber." Heavy coated stock poster, 11"x14" printed blue on white for employee information boards. \$.30 each.

Quantity _____



Also available in 3¼" x 9" pamphlet form suitable for mailing in #10 envelope.
\$ 20 each

Quantity _____

CTD001745

"Recommended Work Practices for Asbestos-containing Gaskets"

\$.60 each.

Quantity _____

Booklet— "Working With Asbestos Cement"

\$.50 each.

Quantity _____

Pamphlets— "Asbestos in the Atmosphere"

\$.25 each.

Quantity _____

"Asbestos in Water—A hazard to health?"

\$.25 each.

Quantity _____

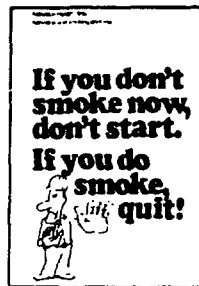
Poster Series— "Asbestos Health Hints for the Workplace." 15"x23" in various colors. Available at \$.50 each or complete series at \$3.00.



Quantity _____



Quantity _____



Quantity _____



Quantity _____



Quantity _____



Quantity _____

Set of Six Posters _____
(Quantity)

Slide Presentation— "Asbestos: A Natural Product for Modern Needs"
(35mm - 20 min)

Special Shipping Instructions:
(Please Include Street Address)

Company

Address

City State Zip

Signature

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