

Industry conditions in 1975 (under the current 5 fibers/cc limit) are much improved over industry conditions which were in effect through most of the 1960's. Each additional step approaching zero fibers/cc is a lot more difficult than the steps that were taken to get industry down to the 5 fibers/cc limit. While it will be burdensome to move the concentrations to the 2 fibers/cc limit, the steps necessary to get down to 0.5 fibers/cc are not known.

There are requirements in the proposed standard for worker re-assignment. If many employees are moved to lesser and lesser duties maintaining the same premium pay that they had received for working with the asbestos products, there will be a negative productivity result. It has been industry practice in the past for night shifts and more difficult tasks to command higher pay premiums. This rotation to another job with no loss in pay will be another penalty to productivity.

The recommendations that will be made by the FMSI or the AIA are not known at this time. It is believed that the AIA stand will include background on medical information. However, it is most important that the individual companies make a response. They should not expect that someone else will write it for them. The Secretary will prepare a bulletin to be sent to the membership suggesting that they comment to OSHA on these requirements. It will be pointed out that the comments must be those of the individual member and they should not echo the suggested outline of problems which the Institute will prepare.

It was also pointed out that there are a lot of new items in the proposed regulations including items on loading, unloading and storing of asbestos cargo. The carrier—be it a railcar, ship or other—must make a visual inspection of the cargo and cargo space to determine if leakage or spillage of asbestos has occurred. Who does this? Does the carrier do this? Are the carriers aware of this problem? A close reading of the proposed OSHA standards revealed many problems of this nature which will have to be pointed out to others who may not feel that they are affected by the asbestos regulations.

THE EPA NATIONAL EMISSIONS STANDARDS FOR ASBESTOS

The Environmental Protection Agency published the amended standards for the National Emissions Standards for Asbestos. This appeared in the Federal Register October 14, 1975. Ordinarily the EPA amendments would be an item of prime concern to the manufacturers. However the proposed OSHA standards are so extensive and so far reaching they must take priority over these new EPA Standards. It was pointed out that the EPA notice is the adoption of the amendments to the standards. These are not proposed amendments.

In particular the waste disposal requirements are of interest to friction materials manufacturers. The friction materials manufacturer is responsible to see that land-fill operators and trucks carrying waste comply with the requirements of EPA on disposal of asbestos bearing materials. The manufacturer is responsible for supervision to see that these requirements are carried out.

Members reviewed the section 61.25 on waste disposal. There was some difficulty with interpretation. Mr. Weaver pointed out that the requirements for covering the asbestos containing material were applicable only if there were visible emissions to the outside air from the waste disposal site. In