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OWENS-CORNING FIBERGLAS CORPORATION FIBERGLAS TOWER, TOLEDO, OHIO 43659. (419) 259-3000



January 4, 1973

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NICA

Mr. James Brown
Fitzgerald and Brown
1000 Woodman Tower
Omaha, Nebraska 68102

Dear Mr. Brown,

This will confirm our telephone conversations of January 2 and 3, 1973, regarding availability of facilities for monitoring asbestos usage, as required by OSHA Act regulations.

A check with Mr. E. Lynn Schall, who is the Managing Director of the American Industrial Hygiene Association, reveals the information that, counting university staffs, there are probably no more than 25 consultants or firms available who could do this work for NICA members who do not have this capability internally.

This area of asbestos monitoring or sampling is a relatively highly skilled one, requiring a fair amount of the exercise of professional judgment if it is done judiciously. Once the samples are taken, it takes about 30 to 45 minutes each for the microscopist to do the actual fiber counting and sizing, thus 60 samples per week per counter is a fair week's production.

With a total enrollment of about 1600 in AIHA, industrial hygienists are in short supply, and leaving out the large companies such as OCF and Johns Manville who have internal staff, I would estimate that there are less than 50 hygienists available in the U.S. to do this work, and not a great many more individuals qualified to do the microscopy.

If this situation were to go on indefinitely, there would be a real need for additional qualified, para-technical personnel trained to do asbestos sampling, monitoring and counting. But while NICA is petitioning, supplies of such materials to NICA, such as OCF, will be out of the asbestos business within 6 to 9 months, which is quicker than monitoring personnel could be made available.

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Thus, as a Certified Industrial Hygienist, it is my professional opinion that NICA's petition for alterations in the monitoring requirements should be favorably considered, otherwise it is likely that the only thing acquired will be numbers for the sake of numbers. Finally, there is a serious shortage of hygienists as it is, and by the time more qualified people are available, NICA will be dealing with non-asbestos materials. There are enough other real health problems requiring the attention of such personnel, and strict enforcement of the asbestos monitoring regulation will simply aggravate an already serious situation.

If there are any questions or I may be of further service to you, please don't hesitate to contact me.

Sincerely,

G. E. Devitt

G. E. Devitt,
Chief Industrial Hygienist

GED:cls

cc: Mr. E. Lynn Schall - AIEA
Mr. W. Munsey - CCF, Santa Clara

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