

March 11, 1976

of material impinging upon it. Thus quoting in terms of mass efficiency has no real meaning. It bears no obvious relation to the numbers of fibers being emitted.

The view held by the Federal occupational health authorities to date has been that the medical evidence as to the size of fiber responsible for adverse health effects is not positive nor is the question of whether fibrils or fibers are most hazardous, and that it would be premature to impose inflexible or overly rigid regulations. If and when the Mt. Sinai research establishes the causation of cancer induction by asbestos, this view will change, particularly since the incidence of lung cancer in the general population has sharply increased over the past several years. The ramifications are readily apparent. As long as the problem has remained one of limited occupational and ancillary exposure, the stress has been placed on containment and protection of exposed employees. If the problem becomes one of national or worldwide proportions, affecting the population at large, demands for a ban on the use of asbestos can be anticipated. This would apply particularly to the brake shoe industry which would be hard pressed to find a suitable material replacement within an acceptable time limit. There is little likelihood that complete collection of brake shoe emissions at the point of release would be practical or acceptable, although this possibility was raised during the meeting.

One final point should be made. The present 5 fiber/M³ occupational exposure limit (2 fibers/M³ as of July, 1976) was established as an index to contain exposure not only to fibers above 5 microns in size, but those below that size as well. An unexpected and controversial proposal to reduce the limit to 0.5 fibers per cubic centimeter was recently published by OSHA. Although conjecture at this point, it is possible that this proposed legislation was not based on inadequately documented and poorly defined British studies set forth in the document, but was based on prior knowledge of the potential disposition of present research efforts.

M. David Gidley
M. David Gidley, Manager
Industrial Hygiene and
Environmental Control

MDG:EJ

CC: G. L. Romine

G. Nicholson

✓ C. C. Blackwell, Jr., M.D.

SPNY 006291