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DOCUMENT DESCRIPTION: Letter to John Marsh from Raybestos Manhattan - AIA - The Most Important Points to be Included in an Industry Statement on Asbestos and Health Problems

INTER ORGANIZATION COMMUNICATION

Raybestos Manhattan

DIVISION and LOCATION

TO: Mr. John H. Marsh

August 22, 1978

SUBJECT: Asbestos International Association
The Most Import Points to be Included in an Industry
Statement on Asbestos and Health Problems

I have read Harry Rhodes' letter to you dated August 15, 1978 and note his concern about my attitude toward what triggers the medical surveillance of asbestos workers.

I have also re-read the sections in the Excerpts from the Asbestos Industry Response to OSHA dated April 9, 1976.

It is not my intention to insist upon unnecessary medical examinations, and I think that the insertion of the word "occupationally" in the 3rd line of item 6.3 on page 2 between "employees" and "exposed", will considerably narrow the field.

I am certain that the trigger for medical examinations should be "occupational exposure" and not over-exposure implied by limiting the surveillance to those "persons regularly exposed to airborne asbestos fibers in excess of the prescribed standards." The viewpoint expressed in the AIA document that it is unnecessary to keep under surveillance persons exposed to asbestos below the prescribed standard is not a valid one in the light of the acceptance by the industry that the exact level for the prevention of cancer has not been demonstrated. It is essential to build up data on low levels of exposure and, therefore, all "occupationally exposed" workers should be examined, regardless of fiber count. At the same time every effort should be made to insure that adequate records are made and kept, showing the type of exposure, duration of exposure and intensity of exposure for each individual to correlate with subsequent medical parameters analyzed. If the asbestos industry wanted to make a positive contribution, the development of a viable technique for auditing the applicability of the provisions of the standard to various jobs and operations would be of immense value to workers, industry and regulatory agencies alike.

Hilton C. Lewinsohn

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