

December 12, 1975

can primarily be attributed to Blok Preform, Blok Finish, and Disc Finish. The requirements for elimination of these exposures have been detailed in several previous Industrial Hygiene survey reports, and will not be reiterated herein. In brief, point source collection should be replaced with hoods which enclose the operations to as great an extent as possible. Duct velocities should be sufficient to provide flow rates of at least 200 feet per minute at the hood faces.

Our main objection to the promulgated standard relates to the recordkeeping requirements for exposure and medical records. The standard directs that such records be kept for a period of at least 40 years or for the duration of the employee's employment plus 20 years, whichever period is longer. This time period is excessive and contributes to the burden of compliance to which the employer is subject. In the case of larger employers, records maintenance will require the services of a full time clerk, and storage will pose a serious problem. There is one consolation however. If exposures are eliminated, the number of records requiring preservation will be reduced since only those locations where asbestos fibers may be released are subject to monitoring. This stipulation also applies to medical records since condition of exposure must exist to warrant maintenance of extensive records.