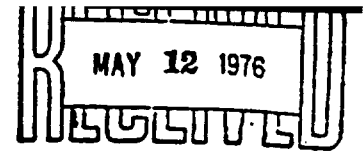




ASBESTOS INFORMATION ASSOCIATION

1620 L Street, N.W., Washington, D.C. 20035 (202) 223-3335



8 April 1976

Docket Officer
Docket H-033
U.S. Department of Labor
Room N-3620
200 Constitution Avenue
Washington, D. C. 20210

Dear Sir:

The 120-day extension for comment on the proposed revision to the OSHA asbestos standard; from December 8, 1975 to April 9, 1976, has permitted this Association the time necessary to sponsor an industry-wide review of the proposal and its effect on the asbestos using industry within the United States.

The analysis, comments, and recommendations pertaining to the proposal are respectfully submitted in an industry effort to cooperate fully with the Department of Labor in the development of a reasonable and practicable standard for the protection of workers in thousands of work places, where asbestos products are manufactured or otherwise processed. The task force effort reached out to all sectors of the asbestos industry, excepting construction. The results of this work are contained in the two volumes, appended hereto. The first volume contains summary comments and recommendations prepared by the task force chairman, Guy G. Gabrielson, Jr.; a statement on the scientific-medical issues raised in the proposal prepared by Hans Weill, M.D.; and detailed comments on the proposed standard prepared by the Standards and Technical Committee of the Association under the chairmanship of Harrison B. Rhodes, Ph.D. The second volume is the technological feasibility and economic impact study prepared by the independent consultant firm, Roy F. Weston, Inc.

We shall be pleased to further communicate or meet with any officials within OSHA to discuss the findings and recommendations presented herewith.

We believe a public hearing on this matter will best serve the interests of asbestos workers, the employers within the industry, and the general public. We request a public hearing at the soonest practicable date.

Sincerely yours,

R. H. Mereness
Executive Director
Enclosures: (in quadruplicate)
RHM:v

The following companies and trade associations have endorsed this statement:

A-Best Products Company	Lipec-Clutch Products Corp.
Abex Corporation	Lukens Chemical Corp.
Aeroquip Corp/Gustin-Bacon Div.	Mannington Mills, Inc.
Alsop Engineering Corp.	Maremont Corp.
Amatex Corp.	Markham Corp.
American Biltrite Inc., (AMTICO)	Milchem, Inc.
American Public Transit Asn.	Molded Materials Company
American Trucking Asn.	Monsey Products Co.
Asbestos/Cement Pipe Producers Asn.	Munters Corp.
Asbestos Textile Institute	National Asn. of Cement Board
Atlas Asbestos Co. (California)	Fabricators
Auto-Friction Corp.	National Asn. Filter Manufacturers
Automotive Parts Rebuilders Asn.	National Asn. Plastic Distributors
Baltimore Air Coil Co.	National Electrical Manufacturers
Beaver Industries, Inc.	Asn. (Laminating Division)
Bird & Son, Inc.	National Friction Products Corp.
Borg-Warner Corp. (Borg & Beck Div.)	National Gypsum Company
Breiner Co.	National Insulation Contractors Asn.
Brown Insulating Systems	Nicolet, Inc.
Brunswick Fabricators, Inc.	Norplex, Inc. (U.O.P)
Cellulo Co.	North American Asbestos Corp.
Cement Asbestos Products Corp.	PPG Industries (Chemical Div.)
Certain-teed Products Corp.	Palmer Asphalt Co.
Chemical Sealing Corp.	Plastics Engineering Co.
Congoleum Industries, Inc.	Quality Gasket & Mfg. Co.
David Fabricators of New York, Inc.	Raybestos-Manhattan, Inc.
Dresser Industries (Maccobar Div.)	Resilient Floor Covering Institute
Drilling Specialties Company	Resinoid Corp.
Eaton Corporation	Rostone Engineering Corp.
Fluid Sealing Asn.	Royal Industries
Foseco-Minsep, Inc.	Shipbuilders Council of America
Friction Materials Standards Institute	Southern Asbestos Co.
GAF Corp.	Stanhope Products Co.
Garlock, Inc.	Supradur Manufacturing Corp.
Gatke Corp.	Synthane-Taylor Corp.
General Dynamics Corp.	Thiokol Corp.
Gibson-Homans Inc.	Tremco, Inc.
Grant Wilson, Inc.	Trumbull Asphalt Co.
Gulf States Asphalt Co.	Union Carbide Corp.
Gypsum Drywall Contractors Intern'l	Uvalde Rock Asphalt Co.
Haveg Industries, Inc.	Vermont Asbestos Group
Hollingsworth & Vose Co.	Wagner Electric Corp.
Industrial Safety Equipment Asn.	Western Slate Co.
International Fiber Inc.	Wisconsin Gasket & Mfg. Co.
Jim Walter Research Corp.	
Johns-Manville Corp.	
Karnak Chemical Corp.	
Kentile Floors, Inc.	
Lamons Metal Gasket Co.	
Latex Fiber Industries	