State OSHA people will not officially advise their counts when the area is in compliance, some have privately said they showed no fiber! This disparity in counts has made several members concerned less OSHA is using these low (or "zero") counts as a basis for proposing the 0.5 fiber/cc limit, with the mistaken assumption that industry is already in or near compliance. Our members wish to emphasize that they are striving to get under the 2 fiber/cc limit by July 1, 1976 and that they are not already complying with the new proposals.

1.3 Epidemiology based on crocidolite asbestos is not applicable to friction materials

Crocidolite (blue) asbestos is not used in friction materials. Any epidemiological data extrapolated from sources using crocidolite, where that type asbestos is considered the significant carcinogen (mesothelioma for example), should not be used where a standard is applied to all asbestos manufacturing. This particular point must be emphasized as regards mesothelioma where these malignancies have been experienced at exposure levels below those causing asbestosis. While it may not be feasible at the outset of a new--or revised--standard to consider the various types of asbestos, it is important that epidemiological studies be evaluated with the knowledge that crocidolite is more likely to produce mesothelioma than the chrysotile asbestos used in friction materials. If the mesothelioma evidenced at lower exposure levels was associated primarily with crocidolite asbestos, is is suggested that this evidence not be used in support of a lower exposure level for all asbestos types.

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