

PRIVILEGED AND CONFIDENTIAL  
September 17, 1984

PLAINTIFF'S EXHIBIT

CAP-776

PROPOSED AIA/NA POSITION  
ON FIBER TYPES

The revised PEL of 0.5 fibers/cc should apply in all settings, including both manufacture and construction. This PEL should also apply to all fiber types. As the record indicates, most asbestos used in the United States today and in the past was chrysotile. Crocidolite is, however, still employed in asbestos-cement pipe manufacture, where manufacturers have found its use crucial to their product, and is inevitably encountered in removal, demolition and alteration work, especially in ships and in industrial settings where insulation installed in the past contained crocidolite.

As discussed in Section II of this brief, at pp. \_\_\_\_, OSHA's reliance almost solely on epidemiology studies in which workers were exposed to considerable amounts of crocidolite biases its risk assessment to overestimate asbestos risk. At the same time, the difficulties of identifying all working environments where crocidolite may exist and of distinguishing fiber types in routine monitoring make it impractical for OSHA to set a differential fiber type standard that will be practically enforceable.

Beyond the impracticality of different fiber type standards in settings where more than one fiber type may exist, a PEL lower than 0.5 fibers/cc would not be technologically feasible given existing constraints on both dust

control and monitoring. Moreover, given the low average exposures that will be achieved with a 0.5 fibers/cc standard and the accompanying ancillary provisions being proposed by AIA/NA, a lower PEL for any fiber type is not necessary to eliminate significant risks in the workplace. OSHA should thus adopt a 0.5 fibers/cc PEL for all asbestos fiber types.

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POSSIBLE AIA/NA POSITION ON FIBER TYPES  
SHORT FORMULATION

OSHA should adopt a PEL of 0.5 fibers/cc for all asbestos fiber types. The record does not provide sufficient support for regulatory distinctions based upon fiber type; substantial difficulties would exist in enforcement for different PEL's for different fiber types; standards lower than 0.5 fibers/cc are not technically feasible for any asbestos operations; and a 0.5 fibers/cc standard would eliminate significant risk in all workplaces.

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