



ASBESTOS INFORMATION ASSOCIATION

1650 L Street, N.W. / Washington, D.C. 20036 / (202) 223-4845

15 July 1974

Dr. Daniel P. Boyd
Director, Office of Standard Development
Occupational Safety and Health Administration
1726 M Street, N.W.
Washington, D.C. 20036

Dear Dr. Boyd:

The Asbestos Information Association/North America consists of twenty-two member companies and associations which represent three-quarters of the asbestos mining, milling, manufacturing, and importing industry of the United States. The Association maintains active liaison with trade and technical groups related to the industry. Over a period of time and on numerous occasions, we have consulted with key representatives within the Occupational Safety and Health Administration in a cooperative effort to develop sound safety and health regulations for the industry. We are pleased to enjoy a close working relationship with OSHA.

When the Association learned of plans to revise the Asbestos Standard, as first published in the Federal Register, Vol. 37, No. 110, June 7, 1972, we spoke with Mr. Lewis COX, Mr. Gerald Scannel and Dr. John P. O'Neill to advise that we would be pleased to take on the task to recommend revisions and develop work practices. We submit, herewith, our recommendations for revising the OSHA Asbestos Standard, as reprinted in the Federal Register, Vol. 39, No. 125, June 27, 1974. We also enclose suggested work practices in the following areas:

- A. Unloading and Storing Bagged Asbestos Fiber.
- B. Introduction of Asbestos Fiber into Manufacturing Processes.
- C. Asbestos Dust and Scrap Removal and Disposal.
- D. Housekeeping in the Asbestos Industry.

Please note that we have addressed only those areas where the Association feels the necessity for clarification or better-defined practical application in the interests of ready compliance within the spirit of the Act. Areas not addressed are considered reasonable and enforceable.

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