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R.F. KASPER**Asbestos****FIRM OBJECTS TO OSHA'S FAILURE TO EXCLUDE NONFIBROUS MINERALS**

The failure of the Occupational Safety and Health Administration to exclude nonfibrous forms of certain minerals from coverage under its proposed revisions to the current asbestos rule could make many industrial grades of talc unnecessarily subject to coverage, E.I. du Pont de Nemours & Company told OSHA.

The firm's comments were forwarded in response to revisions to the current asbestos rule proposed by OSHA last October calling for a maximum eight-hour time-weighted average concentration of 0.5 fibers per cubic centimeter of air with a maximum ceiling concentration of five fibers/cc (Current Report, October 16, p. 638).

Specifically, DuPont objected to the failure of OSHA to exclude from the proposed revisions nonfibrous forms of tremolite, anthophyllite, and actinolite. The failure to exclude these nonfibrous forms "would require unnecessary training, medical surveillance, and labeling . . . many tones of talc which may in truth be completely free of harmful material," the firm said. DuPont called upon OSHA to revise its definition of "asbestos" to eliminate tremolite and to clarify analytical procedures in the proposal.

In support of its views, DuPont quoted from several letters written by former Assistant Labor Secretary John H. Stender to the R.J. Vanderbilt Company in 1974. Stender noted in the letters that nonfibrous or non-asbestiform minerals "are not within the scope of the existing standard."

DuPont also stated that asbestos insulation maintenance work presents special problems "that are not considered in the proposed standard which obviously is written for manufacturing or shop activities." The firm called the monitoring requirements in the proposal "inconsistent" and objected to the inclusion of sputum cytology exams under the medical surveillance provisions.

Asbestos Industry Response

Noting that the proposed revisions relate only to general industry, the Asbestos Information Association/North America (AIA) recommended that OSHA defer action on a final rule until the separate standard pertaining to the construction industry has been proposed and its potential impact measured. The AIA comments were based on reports prepared by two consultants: Roy F. Weston, Inc., for technological and economic feasibility and Hans Weill, professor of medicine, Tulane School of Medicine, on health effects.

If deferral of the final standard is not possible, AIA recommended an exposure level of two fibers/cc with a ceiling limit of 10 fibers/cc, using the membrane filter test method. The two-fiber level will automatically become effective on July 1, 1976, under the current asbestos standard.

In requesting the deferral of a final asbestos rule, AIA noted that 70 to 80 percent of all asbestos manufactured in the U.S. is utilized by the construction industry. "It would be a pyrrhic victory to achieve a viable manufacturing regulation, only to discover that the construction regulation thereafter so threatened or damaged the manufacturers' markets that they could not continue to operate profitably," the comments said.

Feasibility Analysis

According to the AIA comments, the limit of two fibers/cc "is feasible technically and economically." The proposed

level can be achieved in three to five years, although some portions of the secondary segment of the industry may require a somewhat longer period, AIA said.

The two-fiber limit can be attained through what AIA termed "best available technology" (BAT), which is an optimum combination of human engineering techniques and carefully enforced work practices. AIA stated that the costs of installing BAT will not be cheap "but indications are that, for the larger part of the industry, the annual cost of achieving the two-fiber limit can be added to the cost of products sold without significant adverse impact upon market position."

Segments of industry which may have more difficulty economically in meeting the standard may be asbestos textile and friction products industries and certain portions of the secondary industry segment, AIA said.

Health Effects

According to the study by Weill, the weight of scientific evidence tends to support the two-fiber limit proposed by AIA, but neither that level nor the 0.5 fiber/cc limit proposed by OSHA can provide complete assurance that the workplace will be totally free of health hazards.

Weill noted that there is "little debate concerning the causal association between occupational exposure to asbestos dust and certain adverse health effects, including but perhaps not limited to asbestosis bronchogenic carcinoma of the lung, mesothelioma of the pleural and peritoneal surfaces, and gastrointestinal neoplasms."

Weill cited two major alternatives for setting a standard for exposure to asbestos:

- The first alternative depends upon the premise that the adverse health effects demonstrated in workers have resulted from high but poorly quantitated levels of asbestos dust. Where information is available, dose-response relations indicate that for mortality from malignant disease and for asbestosis, the risks were associated with levels of exposure considerably higher than the current or proposed levels of asbestos.

- The second alternative depends on the premise that occupational exposure to asbestos at some level has been shown to be associated with a carcinogenic risk. Since a safe threshold level cannot be scientifically proven at this time, the standard must require that all exposures be at or below the lowest technologically feasible level.

United Paperworkers' View

The United Paperworkers International Union offered the following comments on the OSHA proposal:

- The exposure limit should be fixed at "no detectable level" because OSHA has acknowledged that asbestos is a carcinogen.

- A "regulated area" should be defined as any work area where workers may be exposed to detectable airborne concentrations of asbestos.

- Monitoring requirements in the proposal should be planned and conducted in such a way as to obtain measurements representative of the exposure of each worker exposed to asbestos.

- Worker training and education should be provided to all employees who may be exposed to airborne asbestos fibers. The training and education should include information as to the hazards of exposure to asbestos. All materials used should be available for inspection and copying by worker representatives.

- OSHA should specify in the proposal the number of lavatories deemed necessary in the workplace.