



ASBESTOS INFORMATION ASSOCIATION

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The Honorable Morton Corn
Assistant Secretary of Labor
U.S. Department of Labor
Occupational Safety & Health Administration
200 Constitution Ave., NW
Washington, DC 20210

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Dear Dr. Corn:

From conversations and communications between us in the past you are fully cognizant, I know, of the time and money which the AIA and its members have spent and will spend in responding to the 9 October 1975 OSHA proposal for a regulation of occupational exposures to airborne asbestos, excluding construction exposures, and in preparing to respond to a projected regulation of the latter. You will not be surprised, then, to learn that the 15 December 1976 NIOSH recommendation to your office, that the standard for exposure to airborne asbestos be reduced to 0.1 fiber/ml. TWA (vs. the 0.5 fiber October 1975 OSHA proposal), with a 15 minute ceiling of 0.5 fiber/ml. (vs. the 5.0 fiber October 1975 OSHA proposal), was an unpleasant surprise to our membership. If OSHA were to accept the proposal, it would seem, then, that the entire standards setting process might have to start anew, and all the work which AIA and others already have done as participants in that process would be largely wasted effort. For that reason and because the proposal itself would have very serious implications for the asbestos industry, we believe that it is our right and duty to comment upon this most recent NIOSH document.

NIOSH cites a great many more case and epidemiological studies than it has in the past, including oral communications and unpublished papers, none of which have been available for analysis by the scientific community. It is significant that the authorities cited appear to cast no more light on the issue of the dose/response relationship than have previous citations. There is no data to indicate that the exposures studied were not at least as high as 5.0 fibers/ml. TWA or 10.0 fibers/ml. at their peaks. The NIOSH document concedes that there is no scientific basis for the establishment of the particular exposure standard which it espouses. The rationale offered by NIOSH for its recommendation is that an industrial

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