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DATE: 1973

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OSHA Standards - Minutes, Memos, Report & Letters

Environmental Affairs Department
Denver GHQ
April 11, 1973

W. R. Goodwin
J. B. Jobe
F. H. May, Jr.
R. H. Cuje
E. M. Fenner
W. F. Goodwin
J. E. Hesse
J. R. M. Hutcheson
A. B. Marchant

E. F. Marriner, M.D.
J. A. McKinney
H. B. Moreno
F. L. Pundsack
Ivan Sabourin
F. J. Solon, Jr. - Chairman
W. L. VanDerbeek
W. C. Winblad
G. W. Wright, M.D.

cc: M. M. Swetonic - AIA/NA
File & C

ACTION MINUTES
ENVIRONMENTAL POLICY COMMITTEE
MEETING OF MARCH 30, 1973

A copy of the agenda for this meeting is attached.

The action items that arose from the meeting are as follows:

- (1) Prepare critique of the "Report From NIOSH" presented by Marcus M. Key to the American Public Health Association Meeting in Atlantic City, N. J., on November 14, 1972. - - (G. W. WRIGHT)
- (2) If the Federal Register announcement regarding the reopening of the "Asbestos Regulations" for review states that this action is being taken because of new medical and scientific data and information, then a registered letter should be sent to the originator of the announcement, requesting this data and its source. - - (E. F. MARRINER)
- (3) When AIA/NA sends its list of suggested candidates for the "Asbestos Regulations" Review Advisory Committee to the Department of Labor, they should recommend that if either G. W. Wright, M.D. and/or I. J. Selikoff, M.D. are chosen for the committee, neither should be chairman. - - (M. M. SWETONIC)
- (4) Determine if the Employee Safety and Health Guide, "What You Need to Know About Asbestos", as prepared by AIA/NA, should be printed and distributed to Johns-Manville employees. - - (E. F. MARRINER)

ACTION MINUTES
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- (5) Prepare draft of an "Ad" refuting recent news articles on asbestos and health, and containing positive statements on the uses of asbestos fiber. - - (F. J. SOLON)

J. B. Jobe brought up for discussion the request of the Industrial Products Division that the labels on THERMO 12 cartons contain the statement:

"Asbestos Free"

The conclusion reached by the committee was that the wording

"Asbestos Free"

should not be used. Instead the label could either say

"Made with Cellulose Fiber", or

"Contains No Asbestos".



E. M. Fenner

EMF/emr

Attach.



Johns-Manville

Internal Correspondence

Environmental Policy

To: Committee Members

Date: September 11, 1973

From: Jan McGrath

Secretary-Environmental Committees

Copies:

Subject: ENVIRONMENTAL POLICY COMMITTEE MEETING AGENDA
FRIDAY, SEPTEMBER 14, 1973

Attached for your review, is a list of the agenda items
which will be discussed at the meeting on Friday.

The meeting will be held in the Large Board Room at
10:00 A. M.. Luncheon will be served at 12:30 P.M.

W. R. Goodwin
F. H. May, Jr.
R. P. Carter
R. H. Cuje (Att: G. Bishop)
E. M. Fenner
W. F. Goodwin ✓
J. E. Hesse
J. R. R. Hutcheson
A. B. Marchant
J. A. McKinney
H. B. Moreno
F. L. Pundsack
Ivan Sabourin
F. J. Solon, Jr.
C. J. Sulewski
W. L. VanDerbeek
W. C. Winblad
G. W. Wright, M.D.

Bob Deu - free filtering

AGENDA
ENVIRONMENTAL POLICY COMMITTEE MEETING
FRIDAY, SEPTEMBER 14, 1973

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- | | |
|---|------------------|
| 1. Reopening Asbestos Standard (including
5 Fibers vs. 2 Fibers per cc) | E. M. Fenner |
| 2. AIA/NA Annual Meeting Report | F. J. Solon, Jr. |
| 3. Update Duluth | F. J. Solon, Jr. |
| 4. Lewinsohn-Selikoff Matter | F. J. Solon, Jr. |
| 5. Customer and Association Presentations | E. M. Fenner |
| 6. Washington Contacts | R. P. Carter |
| 7. FDA Proposed Talc Regulations | R. P. Carter |
| 8. Upcoming Meetings:
Selikoff-NIEHS November 10, 1973
Selikoff-Proposed N.Y. Academy of Science
October 1974. | F. J. Solon, Jr. |
| 9. G. W. Wright Amosite Memorandum | F. J. Solon, Jr. |
| 10. Policy Discussion:
Customer Assistance in Meeting Asbestos
Regulations. | F. J. Solon, Jr. |
| 11. Quick Retrieval Library | Jan McGrath |
| 12. Position Papers | W. A. Cooper |
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*Scientific Comm
what are they doing
projects: \$400,000*

His - Statisticians

W. VANDERBECK
2/2
OF 2-83
AFD

To: Senior Staff
From: Paul Kotin, M.D.
Copies: File

Re: PROPOSED CHANGE TO ASBESTOS STANDARD

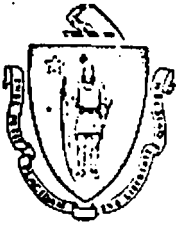
Today (October 9, 1975) the Occupational Safety and Health Administration (OSHA) will publish in the Federal Register proposed changes to the job health standards on asbestos. These proposed revisions will include:

- reduction of permissible exposures to an 8-hour time-weighted average of 0.5 f/cc;
- reduction of ceiling limit (determined during any 15-minute sampling period) to 5 f/cc;
- establishment of additional requirements for regulated areas, employee rosters, hygiene facilities, worker training and information programs, signs and labels, and monitoring and medical surveillance programs;
- extension of the period for retaining monitoring and medical records to 40 years, or for the duration of the employee's employment plus 20 years, whichever is longer (current retention period is three years for monitoring and 20 years for medical records);
- exclusion of construction activities from the revised standard, continuing coverage of that industry under the existing standard.

By far the most important change is the proposed reduction of the permissible 8-hour time-weighted average exposure to asbestos to 0.5 f/cc from the 2 f/cc standard which was to take effect July 1, 1976.

We are concerned by the proposal for several reasons. First, by the haste with which the standard was proposed and the apparent lack of consultation with either industry or labor, or even other appropriate offices within OSHA. Comprehensive inquiries have failed to identify the source of the pressure on OSHA to reduce the standard from 2 f/cc, as planned for July 1, 1976, to 0.5 f/cc.

Second, customary procedures have not been followed in the development and publication of this proposal. For example, preparation of an economic impact statement usually precedes publication of a proposed standard; however, this procedure has been reversed in this situation.



IN YOUR REPLY
REFER TO FILE

The Commonwealth of Massachusetts

Department of Labor and Industries

Division of Occupational Hygiene

39 Boylston Street, Boston 02116

6WW

August 30, 1973

Mr. Richard Goodwin, President
Johns-Manville Corporation
Greenwood Plaza
Denver, Colorado

Salon 2710
Fennel 2252

Dear Mr. Goodwin:

As you may know, this division has made a number of studies of asbestos dust and fiber exposure of workers in your Billerica, Massachusetts, facility. It is apparent from relatively recent epidemiological information that industry and the industrial hygiene profession have underestimated the potential of asbestos fibers for producing injury.

While most continuous exposures to asbestos fibers are at manufacturing facilities such as yours, there are many exposures among the users of asbestos products, which, while typically intermittent, are also typically uncontrolled or, at best, inadequately controlled.

We have recently had occasion to measure asbestos fiber concentrations at plants where Marinite board was being processed by drilling, sawing, and even handling. Concentrations were in excess of the current OSHA standard have been found, the highest value we have recorded being in excess of 100 fibers per milliliter of air, as opposed to the permissible standard of five. We believe that this fact warrants a further investigation of asbestos exposure among users of your Marinite products. We would, therefore, appreciate it if you could send us a list of your customers for this material in Massachusetts. This information would be used solely for the purpose of investigating possible areas of harmful exposure to asbestos fibers among workers and taking the necessary action to eliminate such exposure.

If this particular procedure is not practicable from your standpoint, we would appreciate any suggestions you can make as to how we could proceed in this matter.

Very truly yours,

Hervey B. Elkins
Hervey B. Elkins
Director

HBE s

Third, while the proposed revision includes a bibliography of approximately 50 references, none of these references contains data that were not known at the time the 2 f/cc standard was established. At the recent International Congress on Occupational Health at Brighton, England, however, Sir Richard Doll reported on the mortality experience for lung cancer in employees of Turner Brothers through 1974, and he indicated a lung cancer rate three times over that expected in asbestos workers. At the same meeting, Dr. Muriel Newhouse, in collaboration with her statistician Dr. Geoffrey Berry, reported on the development of a prospective mathematical model from which they concluded that the attack rate for mesothelioma in the work population of Cape Asbestos, United Kingdom, would be approximately 11 percent. This figure is significantly higher than the 7 percent rate projected by Dr. Irving Selikoff for his highly exposed asbestos insulation workers, and the more generally accepted rate of 4 percent in asbestos occupational groups as a whole.

These findings, though, do not provide support for the proposed reduction of the standard. The assumption made by Doll that the Turner population was exposed only to 2 f/cc is not supportable by fact. The Newhouse data uses a mathematical model that has serious limitations in the opinion of other recognized statisticians.

Johns-Manville adheres to the position that 2 f/cc, the standard promulgated for implementation July 1, 1976, is a level of exposure at which there is no hazard as measured by impact on morbidity and mortality patterns. In addition, the justification for, as well as the feasibility of, many other aspects of the proposed change are open to serious question.

In accordance with regulations, Johns-Manville will respond to the proposal in the Federal Register within 60 days, following which a public hearing will certainly be held, although it may be postponed until spring since an inflationary impact statement must be published at least 30 days prior to any scheduled hearing. While we are preparing our response, it is the recommendation of Health, Safety and Environment that J-M's position regarding the proposal be that the review and analysis of all scientific data available do not support the proposed reduction of the permissible exposure to asbestos from 2 f/cc to 0.5 f/cc.

MEMO TO FILE

MEETING WITH NIOSH PEOPLE

Asbestos Textile - Microfiber

On January 4 a meeting was held to discuss (1) the asbestos industrial hygiene work and the textile operations in general, and (2) the forthcoming study involving microfibers at Waterville 07. Those attending the meeting dealing with asbestos included Mr. Robert Curtis of NIOSH; Mr. Phil Bierbaum of NIOSH; Mr. C. L. DeBiase, General Mgr. IPD; Mr. Stoddard Lane, Production Mgr. IPD; Mr. Jim Nugent, Manville Plant; and Mr. W. B. Reitze, Manager, Accident Prevention and Industrial Health.

The NIOSH people were desirous in determining whether our textile operation in A building is a typical asbestos textile operation and whether all types of textile can be produced under the same stringent control procedures as we now have in operation in Manville. I believe that we got across to the federal people the fact that our operation at Manville is very small and it does not contain a full product mix in textiles. Messrs. Curtis and Bierbaum were informed that in many cases we chose to discontinue a low-volume textile product line rather than work out an effective control procedure. It was stated that while we did not doubt that by spending additional monies, we could control most textile operations, however it was further stated that when it becomes economically unsound to produce a product it must be dropped from the line. The possibility may well exist that for certain specific textile operations control may be extremely difficult or uneconomical and that the 2 fibers limit may therefore drive a substantial portion of the asbestos textile business to the Hong Kong/Taiwan/Japan area.

I would consider this portion of the meeting a success in that the federal people were made aware of the fact that (1) we do not have a typical operation, and (2) the lowering of the existing standard to the proposed 2 fiber limit may cause substantial cutbacks in domestic production of asbestos textile products.

Fibrous Glass

The fiber glass meeting was attended by Mr. Curtis, Mr. Bierbaum and myself. At this meeting it was learned that their projected physical examination of our people at Waterville has been postponed until May. There was still some doubt as to whether it will ever be accomplished.

During the week of January 14, they are reportedly examining the population of the Owens-Corning plant in Santa Clara, California.

They have no further data on the exact protocol that Dr. Parnes and his staff will use for the examinations. As the time draws near, a meeting is planned with Dr. Parnes to outline specifically what it is he intends to do at our Waterville facility.

Regarding the fibrous glass criteria package which has been imminent for some time, Dr. Bierbaum informed me that during the month of September, a letter was written by Dr. Marcus Key to Secretary Stender that the package would not be issued for quite some time. They are reluctant to issue the criteria package until all the data is in on microfibers. They have reason to believe that a work practice type of document would be more useful and therefore will shortly solicit further input from industry in the form of a request to be published in the Federal Register. It was Bierbaum's opinion that the fiber glass package would not be released before January, 1975. There is no plan at present by NIOSH to piggy-back the mineral fiber package on fiber glass. These apparently will be two separate documents. The possibility of a combination document was considered but apparently rejected.

W. B. Reitze

CC: J. Solon ✓