FRICTION MATERIALS STANDARDS INSTITUTE, INC., E-210 SITE 4, PARAMUS, N. J. 07652

July 17, 1975



To: Asbestos Study Committee

Subject: Items of interest to Committee

THE 2 FIBER/CC LIMIT AND MEMBRANE FILTER METHOD

At the April 25, 1975 committee meeting, a resolution was passed:

> RESOLVED: That the Committee requests guidance from the Board of Directors concerning the problem of the 2 fiber/cc limit and the lack of reliability of the membrane filter method for measurement of fiber counts.

This resolution was discussed at the June 17, 1975 meeting of the Board of Directors. Quotations from a draft copy of the minutes of that Board of Directors meeting follow:

> At this point it was stated that the Asbestos Study Committee had passed a resolution as follows: "That the Committee requests guidance from the Board of Directors concerning the problem of the two fiber/cc limit and the lack of reliability of the membrane filter method for measurement of fiber counts." The Asbestos Study Committee members were concerned that while the membrane filter technique is the only method now available for measuring asbestos concentrations it is a most unreliable tool for enforcement of the two fibers/cc limit. In searching for guidance for the Committee one Director stated that our objection to use this method for enforcement would not be constructive. It would just stir matters up without providing an alternative. Some regulatory authorities are receptive where suggestions are made for improvement. Simply indicating our dissatisfaction with the membrane filter method for enforcement might be considered as a negative attitude.
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> A Director stated that the hygienists will use common sense and realize the fallibility of the membrane filter technique. It is fairly well known in industry and government that this technique is fallible. While the directors expressed concern over the use of this as an enforcement tool, they do not feel that any Institute position should be expressed to OSHA concerning its use. It was felt that those enforcing the OSHA regulations are aware of the disparity in results using this technique.
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> At this point Mr. Jain of the FEMFM indicated that work had been done in Europe concerning sampling and counting. He said that his asbestos association Chambre Syndicale de l'Amiante (France), had an expert working for the association in the sampling and counting area. Members exchange slides and see how the counts come out. He is waiting for a report on this study. It was suggested that there is no other means of measuring the asbestos concentration and it is most likely OSHA will stay with this method regardless of any input

In summary, the Directors suggested that no action be taken as regards membrane filter method and its use for enforcement of the 2 fiber/cc l on July 1, 1976.

OSHA PROPOSALS ON NIOSH INVESTIGATION OF PLACES OF EMPLOYMENT

On June 24, 1975, OSHA published proposed rules for NIOSH investigat places of employment. OSHA states that the proposed amendments are to cover procedures that have informally been utilized by NIOSH sin of the OSHA Act and that no additional burden is placed on employer

A copy of this notice as it appeared in the Federal Register is enc

EWD/erc
Enclosure

E. W. Driselene
Executive Director