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[illegible]

March 28, 1972

The Honorable George C. Guenther
Assistant Secretary of Labor
U. S. Department of Labor
Washington, D. C. 20210

Dear Mr. Secretary:

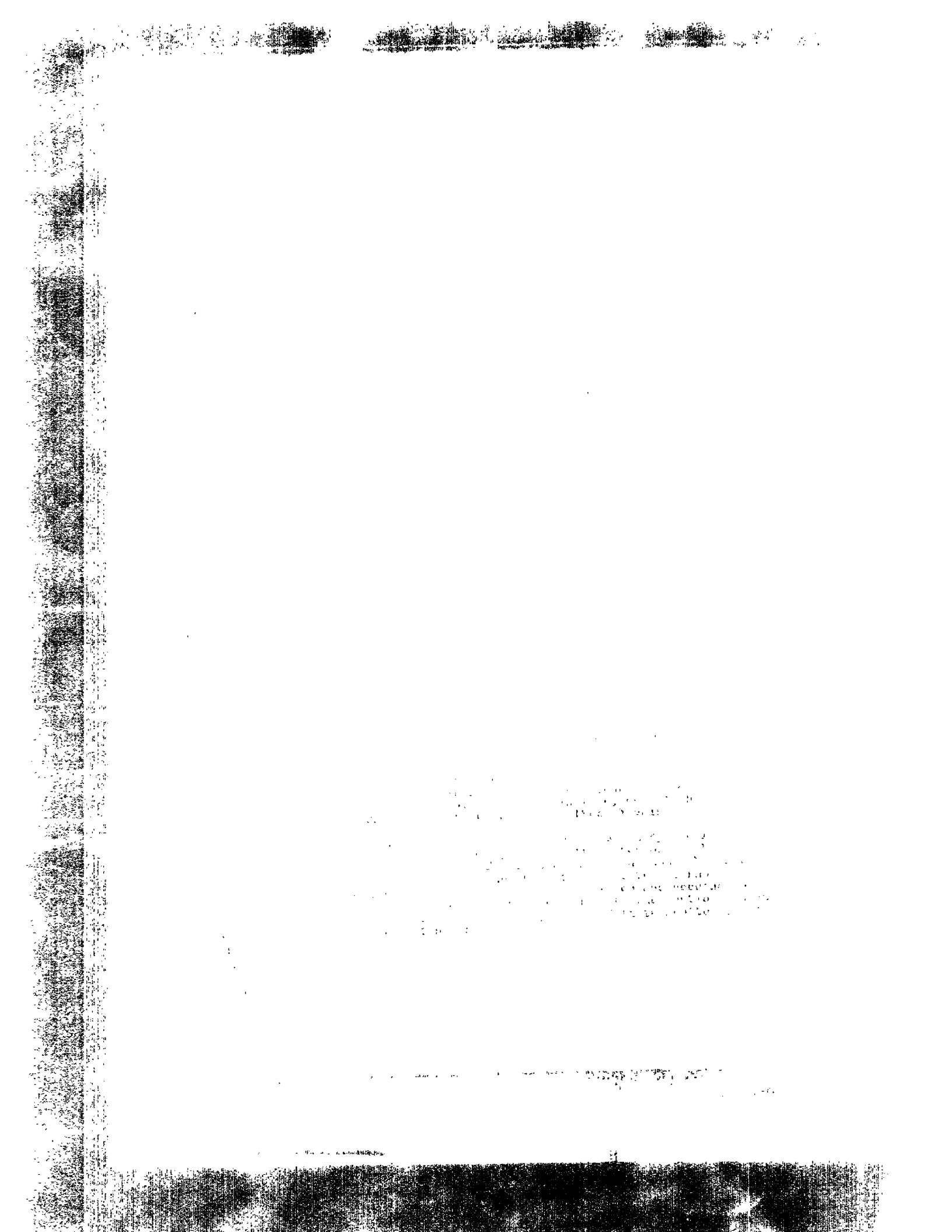
On February 29, 1972, Dr. Perrau H. Key urged that the American Industrial Hygiene Association testify on the proposed standard for asbestos or, in lieu of oral testimony, submit a written comment. In view of the responsibility of developing detailed AIHA comments before the deadline for requesting permission to testify, I wrote Secretary Hodgson on March 3, 1972, expressing our intention to file a written comment.

I appointed an Ad Hoc Committee chaired by Professor William A. Nelson, Harvard University, and with the following members:

Daniel C. Drinker, M.D., Acting President,
Industrial Health Foundation
Arthur Hobson, Hartford Insurance Group
William E. Hobbs, Johns Manville Corporation
(Louis [illegible], United Rubber Workers was invited to participate, but was unable to serve.)

This Committee submitted a report dated March 22, 1971, which was circulated to the Board of Directors of the American Industrial Hygiene Association for comment and approval. The report of the Committee has now been approved by the Board of Directors with [illegible] editorial changes, and constitutes the official position of the American Industrial Hygiene Association, as follows:

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3. We have several reservations about the [illegible] of the medical surveillance program cited in the [illegible]. It is our opinion, as was the Advisory Committee's, that [illegible] proposed to be [illegible] should be [illegible] proposed to be covered by the following changes:

a. Spirometry is of limited value and should not be required.

b. X-rays should include both a lateral and posteroanterior view.

c. Paragraph 1910.93 (b) (2) Records are to be changed to require that records should [illegible] be available to those [illegible] to work [illegible] employee selected by the employee. Since the employer is responsible for the health of the employee, his medical representative should have access to the medical records.

4. In the opinion of the Committee, the detection of materials and the levels covered by the Occupational Health and Safety Act should be performed in a personal method. The [illegible] technique explained in the NIOSH document is an attempt in this direction, but the proper [illegible] procedure. We urge that the Department of Labor consider a [illegible] tolerance which will be consistent and suitable with [illegible] covered in future standards and the label be informative to the employee.

5. The in-mask sampling recommended in Section 8 is an extremely difficult field procedure. We question its validity for this standard. We believe that NIOSH should conduct [illegible] studies of this type so that the employer will have information which will make available a range of protection factors for various respirators.

6. We concur in the statements made in Section [illegible] on the appraisal of employees of the hazards from asbestos.

7. A limited number of statements on proper work practices are listed in Section 6. The Advisory Committee has [illegible] tional emphasis on the importance of these work procedures in the control of airborne dust. We concur in the importance of this information as the most significant contribution to the handling of asbestos and recommend that the preparation and distribution of this information be given priority.

B. Recommendations of the Advisory Committee on Asbestos Regarding Proposed Standard for Asbestos

1. [illegible] on the allowable air concentration [illegible] a-Section 1 of [illegible] in our review of the [illegible] term [illegible] Committee report.

We recommend that the time-weighted average exposure [illegible] 5 fibers/c.c. [illegible] concentration of 10 fibers/ [illegible] be reduced in this [illegible] standard should be revised [illegible] years [illegible] significant [illegible] of asbestos [illegible] case will be [illegible] asbestosis [illegible].

2. The use of vacuum cleaners as recommended by the Advisory Committee [illegible] however, [illegible] that these devices should be shown to be effective for collection of asbestos. Certain vacuum cleaners are inefficient against asbestos dust. Alternative wet cleaning methods [illegible] be allowed where it can be shown that they are safe [illegible].

3. The Advisory Committee recommends that protective [illegible] be used when the exposure to asbestos dust is [illegible] than 10 times the standard. We recommend that such equipment be mandatory when the time-weighted average exposure exceeds 10 fibers/c.c.

The use of compressed air for cleaning purposes should be prohibited. This would then permit the deletion of sub-para[illegible] [illegible].

4. At Page 1910.93 (f) (3) the final phrase should be rewritten to read "in paragraph (c) of this section". [illegible] should not [illegible] that the exposure will be to 500 times the limit.

(C 150)

5. We do not agree with the decision of the Advisory Committee to require irrigation labels for unbreakable containers proposed in Part 190.93 (c) (1). As we have pointed out in the review of the PPDT Part 170, we feel that a person having [illegible] will be [illegible] should be developed. A caution label is not required on finished products containing 5 or less per cent by weight of ethylene oxide which the exposure [illegible] by checks of [illegible] prior.

On the [illegible] section in 190.93 (c) (1) we think that it would be more consistent with present [illegible] to use the term [illegible] than DHEW.

We recommend that specific to ethylene oxide [illegible] anticipate [illegible] The possibility that [illegible] may be required for [illegible] may be shipped. It would be [illegible] be required to [illegible] such as cork, rubber stoppers, and [illegible].

6. We concur with Section 7 of the EIOSH package which deals with [illegible] plan. We feel that the [illegible] proposed by the Advisory Committee [illegible] useful purposes.

William A. Burgess
Chairman, Ad Hoc Committee

AC 150

The American Industrial Hygiene Association is pleased to submit these comments, although I am sure that you will realize that a more complete analysis might have been possible if more time had been available. We shall be glad to participate in the development of future standards under the Occupational Safety and Health Act, consistent with such matters in the development of you and Dr. Key find appropriate to do this will, we should appreciate as much advance notice of your intention as possible, so that we can make the most prompt contribution. Time to draft an opinion for Board of Directors' approval is also to be useful.

Respectfully,

John A. Zapp, Jr.
President

cc: Marcus H. Key, M. D.

bcc: P. D. Bailey
J. W. Sledzieski
M. L. Schuil
P. H. Church
K. J. Baker
D. A. Fraser

Ad Hoc Committee for Asbestos Standards
W. A. Burgess, Chairman
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AC 150