

**UNION  
CARBIDE**

INTERNAL CORRESPONDENCE

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Date March 31, 1983

Originating Dept. EO/G - HS&EA

Subject Asbestos - Exposure Limit Change Proposal

copy: E. B. Harris  
T. E. Lawrence  
J. B. Mickey  
D. G. Moshier

The two fibers per cubic centimeter limit for airborne asbestos is under strong attack - see attached.

Very truly yours,

*J. S. Cornell /jgh*

J. S. Cornell

JSC/jgh

Attachment

UCC 011608

# **LOWERING TWO-FIBER LIMIT SHOULD BE OSHA'S TOP PRIORITY, AFL-CIO CONTENDS**

Reducing the Occupational Safety and Health Administration's asbestos standard to account for risks of cancer from exposure below the current limit of two fibers per cubic centimeter should be a top agency priority, the AFL-CIO contended March 11, charging that "many thousands of the more than two million workers exposed at or below the standard will die of asbestos-related disease in the coming years."

In a letter to Assistant Labor Secretary Thorne G. Auchter from George H.R. Taylor, director of the AFL-CIO Department of Occupational Safety and Health, the federation asserted that the agency "withheld from the public" a 1981 draft preliminary risk assessment until it surfaced last month in litigation (Current Report, Feb. 24, p. 788).

"Contrast this silence," Taylor wrote, "with the zeal displayed by the agency in calling attention to studies by industry tending to downplay the effects of toxic materials on workers, and factoring them into its health standard reviews." The agency's attention to rulemaking project directed toward "weakening existing health standards," he charged, is a course of conduct that "allows the weeds to grow up and obscure the asbestos problem."

Citing a statement made in court proceedings by an OSHA attorney that rulemaking on revising the standard "admittedly hasn't gotten off the ground" (Current Report, Feb. 24, p. 787), Taylor called the agency's handling of the matter "incredible and irresponsible" in the face of growing congressional and public attention to the "enormity of the asbestos problem."

Taylor asked in the letter for OSHA to explain why the 1981 assessment was not released earlier and to report an action the agency has taken over the last two years to revise the standard. He also requested a timetable for issuance of final revised rule.

Between eight and 260 excess lung cancer deaths per thousand workers exposed to asbestos over 45 years at the current OSHA limit can be expected on the basis of widely varying epidemiologic evidence, according to the agent

document cited by Taylor, which as a draft does not represent official government policy.

The draft assessment also found that at an exposure level of 0.5 fiber/cc, from two to 75 cancer deaths per thousand could be expected, and at 0.1 fiber/cc, 0.4 to 15 deaths per thousand. Taylor characterized as "significant" the risks projected at these levels.

## **Limit 'Grossly Inadequate'**

Evidence accumulated since the two-fiber limit was adopted in 1972 has confirmed that the OSHA standard is "grossly inadequate," Taylor wrote. He cited an incomplete 1975 effort to reduce the limit to 0.5 fiber/cc and noted a 1980 report of a working group composed of scientists from the agency and the National Institute for Occupational Safety and Health that urged banning "non-essential" asbestos exposures and limiting others to a level of 0.1 fiber/cc.

"Unfortunately, with the change in Administrations, regulatory action on asbestos ceased," Taylor charged. He objected to failures to meet fiscal 1981 and 1982 targets for issuance of an advance notice of proposed rulemaking and claimed that, despite official pledges to the contrary, "there has been no perceptible action by the agency to reduce the asbestos standard."

Pointing to a total of 200,000 excess cancer deaths projected in a Labor Department-sponsored study by Mount Sinai School of Medicine to take place by the year 2000 as a result of past asbestos exposures (Current Report, June 24, 1982, p. 84), the union official warned that "OSHA must move to protect workers currently exposed or this toll will go unabated into the next century."

An agency spokesman told BNA that the draft preliminary assessment will be revised to take account of new data, including the Mount Sinai study and a British government risk assessment, and will be issued as a preliminary document along with a proposal on changing the standard. Agency health standards officials expect the proposal to be published in December 1983, he added.

The draft assessment was placed in the public docket March 8, the spokesman said. Copies may be obtained by contacting the OSHA Docket Office, U.S. Department of Labor, 200 Constitution Ave., N.W., Room S-6212, Washington, D.C. 20210; telephone (202) 523-7894.

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