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

June 20, 1972

TO: MEMBERS OF ASBESTOS STUDY COMMITTEE

SUBJECT: OSHA STANDARD - POSITION OF INDUSTRY, NIOSH AND ADVISORY COMMITTEE

Mr. I. H. Weaver, Chairman of the Committee, felt the attached tabulation proposed by AIA/NA comparing items in the OSHA Standard against the Inudstry position and the recommendations of NIOSH and the Advisory Committee on Asbestos Dust would be of interest to all members of this Committee.

Copies of this tabulation are attached for your information.

E. W. Drislane
Executive Secretary

EWD:llz

PLAINTIFF'S EXHIBIT
WV-06188

PLAINTIFF'S EXHIBIT
11928-O

OSHA REGULATIONS ON ASBESTOS

Subject	Industry Position	NIOSH/Advisory Committee Recommendation	Final OSHA Standard
1. Numerical Standard	Five fibers with no automatic reduction to two fibers.	Five fibers with an automatic reduction to two fibers in two years.	Five fibers with an autom reduction to two fibers in four years.
2. Labeling	No label on locked-in asbestos containing products. The words "cancer" or "danger" should not be used on labels.	All asbestos-containing products should be labeled. Label should carry words "cancer" and "danger."	No label on locked-i abs containing products. Word "cancer" and "danger" wil not be used.
3. Monitoring Frequency	Monitoring should be conducted at a frequency necessary to assure compliance with the environmental standards. Management should decide frequency.	NIOSH: Annual monitoring at stations below TWA. Quarterly monitoring at stations above TWA. ADVISORY COMMITTEE: Twice-yearly monitoring at stations below TWA. Monthly monitoring at stations above TWA.	Monitoring every six mont at stations above TWA. Monitoring at other stati at a frequency to assure compliance with environm standards. Management to decide frequency.
4. Protective Clothing	No protective clothing required below 5-10 times TWA.	NIOSH: Protective clothing required in all areas above limit. ADVISORY COMMITTEE: No protective clothing below 10 times TWA.	Protective clothing requi only where peak exposure above limit (10 fibers) occur.
5. Waste Disposal	Only wastes that generate dust in excess of limits	All waste should be bagged.	Only wastes that generate dust in excess of limits

Subject	Industry Position	NIOSH/Advisory Committee Recommendation	Final OSHA Standard
6. Frequency of Medical Examinations	Exams every two years for workers with less than 10 years exposure. Exams every year for workers with more than 10 years exposure, or with symptoms of disease.	NIOSH: Same as industry position. Advisory Committee: Same as industry position.	Annual exams required of all employees exposed to asbestos dust, regardless of length of employment.
7. Medical Surveillance	Employer should "provide or make available" medical exams as required.	NIOSH: No specific recommendation. Advisory Committee: Employee should select physician to perform exam. Employer to pay cost of exam.	Same as industry position
8. Medical Records	Employer shall maintain records and have access to them as required to comply with regulations.	NIOSH: No specific recommendation. Advisory Committee: Employer shall not maintain records nor have access to them.	Same as industry position
9. Wearing of Respirators	No specific recommendations.	NIOSH: No specific recommendation. Advisory Committee: No employee shall be required to wear a respirator if he has any of a long list of symptoms of disease.	Physician selected by employer to conduct medical surveillance program shall decide if employee can or cannot wear respirator.

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

June 20, 1972

TO: MEMBERS OF ASBESTOS STUDY COMMITTEE

SUBJECT: OSHA STANDARD - POSITION OF INDUSTRY, NIOSH AND ADVISORY COMMITTEE

Mr. I. H. Weaver, Chairman of the Committee, felt the attached tabulation proposed by AIA/NA comparing items in the OSHA Standard against the Inudstry position and the recommendations of NIOSH and the Advisory Committee on Asbestos Dust would be of interest to all members of this Committee.

Copies of this tabulation are attached for your information.

E. W. Drislane
Executive Secretary

EWD:llz

PLAINTIFF'S EXHIBIT NO. GX-217

OSHA REGULATION OF ASBESTOS

Subject	Industry Position	NIOSH/Advisory Committee Recommendation	Final OSHA Standard
1. Numerical Standard	Five fibers with no automatic reduction to two fibers.	Five fibers with an automatic reduction to two fibers in two years.	Five fibers with an automatic reduction to two fibers in four years.
2. Labeling	No label on locked-in asbestos containing products. The words "cancer" or "danger" should not be used on labels.	All asbestos-containing products should be labeled. Label should carry words "cancer" and "danger."	No label on locked-in asbestos containing products. Words "cancer" and "danger" will not be used.
3. Monitoring Frequency	Monitoring should be conducted at a frequency necessary to assure compliance with the environmental standards. Management should decide frequency.	NIOSH: Annual monitoring at stations below TWA. Quarterly monitoring at stations above TWA. ADVISORY COMMITTEE: Twice-yearly monitoring at stations below TWA. Monthly monitoring at stations above TWA.	Monitoring every six months at stations above TWA. Monitoring at other stations at a frequency to assure compliance with environmental standards. Employer to decide frequency.
4. Protective Clothing	No protective clothing required below 5-10 times TWA.	NIOSH: Protective clothing required in all areas above limit. ADVISORY COMMITTEE: No protective clothing below 10 times TWA.	Protective clothing required only where peak exposures above limit (10 fibers) occur.
5. Waste Disposal	Only wastes that generate dust in excess of limits	All waste should be bagged.	Only wastes that generate dust in excess of limits

Subject	Industry Position	NIOSH/Advisory Committee Recommendation	Final OSHA Standard
6. Frequency of Medical Examinations	Exams every two years for workers with less than 10 years exposure. Exam every year for workers with more than 10 years exposure, or with symptoms of disease.	NIOSH: Same as industry position. Advisory Committee: Same as industry position.	Annual exam required of all employees exposed to asbestos dust, regardless of length of employment.
7. Medical Surveillance	Employer should "provide or make available" medical exams as required.	NIOSH: No specific recommendation. Advisory Committee: Employee should select physician to perform exam. Employer to pay cost of exam.	Same as industry position
8. Medical Records	Employer shall maintain records and have access to them as required to comply with regulations.	NIOSH: No specific recommendation. Advisory Committee: Employer shall not maintain records nor have access to them.	Same as industry position
9. Wearing of Respirators	No specific recommendations.	NIOSH: No specific recommendation. Advisory Committee: No employee shall be required to wear a respirator if he has any of a long list of symptoms of disease.	Physician selected by employer to conduct medical surveillance program shall decide if employee can or cannot wear respirator.