

## Memorandum

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TO : Mr. Andrew Husey, Director  
Division of Criteria and Standards Development, BOSH

FROM : Dr. Douglas H. K. Lee  
Associate Director for Scientific Information and Communication, NIEHS

SUBJECT: Proposed criteria for asbestos

DATE: September 24, 1969

Thank you for your kind words. That is one advantage of being the lazy type — you pick out the essentials and throw the rest away so that you will not have to read it again!

I showed the draft methods to Drs. Payne and Fishbein. The latter could find no criticism of the analytical methodology. Dr. Payne suggested that the section on "principles of sampling" might be superfluous since experts would be taking the samples; but I am not so sure that that is always the case. His comments are attached for your information.

It occurred to me, when I got to thinking about it, that perhaps the logic leading from observed effects up to a decision on what levels to set is a bit weak. It is hard to tell without seeing the finished product, but I am afraid that one might get the impression that, in spite of all the discussion on asbestos and its effects, the recommended levels were essentially picked out of thin air.

I would like to see the argument developed somewhat along these lines:

- a. The 12 fiber/ml level recommended by the British still seems to result in some asbestosis;
- b. It is difficult to say just how low the count would have to be to reduce the risk of asbestosis to minimal proportions;

...proved, asbestos has carcinogenic  
low dosages would involve some

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...crete evidence, it is deemed  
allowable concentrations just as

Table III in the Lynch & Ayer paper indicates that average  
concentrations well below the 12 fiber/ml level are entirely  
harmless;

In the light of these considerations it is recommended that—

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