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this before factories are closed down and fines are levied when there is doubt as to how accurate the measurement is. Because of the wide variation in results there is concern among members as to the millions of dollars now being put into control methods. Even with these expenditures, there is no way of knowing positively whether industries are getting their counts down to the required levels. Various words were used to describe the reliability of the membrane filter method for enforcement: One indicated that it was "unreliable," and another indicated that it was "inadequate." The emphasis was that it is the only tool now available but it is not the proper tool for enforcement.

Ironically it had been suggested by some government people in the past that the friction material industry would be the first to comply with the OSHA standards. NIOSH felt that the friction materials business could most readily meet these standards. At this meeting, industry members are indicating that it may be more difficult for the friction materials business to meet the levels because of the difficulty in counting the fiber samples. It was suggested that if we're having difficulty meeting the 5 fibers/cc limit currently, it would be near impossible to meet the 2 fibers/cc limit due July 1, 1976. It was suggested that the Industry should oppose this change.

It was stated that realistically it is unlikely that OSHA will not go to the 2 fibers/cc limit on July 1, 1976. The only question is will they go lower than the 2 fiber limit? Dr. Selikoff has spoken of a 1 fiber/cc limit and has even said no fibers. It was stated that the Asbestos Information Association had circulated information concerning the NIOSH suggestion that the friction materials business would come under the standard now. Such literature was never received by the Institute. Most members on the Committee were unfamiliar with this NIOSH suggestion.

As had been suggested earlier, it is necessary to make the counts as accurate as possible. For this reason suggestions on counting procedures, possible crystallization of solvents, and a prohibition on the re-use of slides are important. Mr. Weaver pointed out that in a recent publication he noted that a plastic shroud is placed about the entrance to the pump being worn at the work place, in order to keep large particles of asbestos from getting pulled in to the filter. This shroud would prevent material from being taken from a worker's clothes as well as from some large pieces that would ordinarily fall to the floor without being inhaled. He stated that Turner Brothers has been using such a shroud. The unit is completely open on the front and it is felt that this technique gets rid of some sporadic high counts. Mr. Weaver will get a copy of this and distribute it to the members. This could be another possible improvement in the sampling technique which might make the membrane filter method more palatable. It was suggested that this be considered and perhaps a proposal be made to OSHA for its use. The problem is twofold: (1) Improving the reliability of the membrane filter technique, and (2) The use of the membrane filter as a tool for enforcement with its lack of reliability.

This subject had been fairly well covered. There was some agreement about the problems in using this technique as a tool for enforcement of the OSHA regulations. The question was what should be done about it? One member stated that the Committee would be remiss if it did not advise the members of these difficulties. It was suggested that the Board of Directors be advised that there is a problem and that there is going to be more of a problem when the 2 fiber limit is put into effect. To repeat the problem: