

"Occupational Exposures to Toxic Substances in Laboratories" 1910.1450

COMMENTS

1. In Indiana our BL employees will be covered by a comparable Indiana State Law. (See P.4)
2. Overall, I think this Std. is reasonable for R&D, and will back us up in our "recommendations" to the technical community, because now we will have a standard that explicitly covers us.
3. Additional protection is provided because Non-OSHA regulated substances are also covered, also since the TLVS (ACGIH) are updated, a more current approach will be taken.
4. Training & Education - provisions are very good - appear workable for R&D, and should not more closely mirror the OSHA Haz. Com. Std. (See P.10)
5. Regarding T & Ed. - our problem arises from our Support Staff -
porters, union workers
contract employees
grounds maintenance
summer help

this Std. adequately address the educated, technical person, but not the functions mentioned above.

I think the original OSHA Haz. Com. Std. training & education better applies.
6. It seems that Bell Labs would fall under "Industrial R&D" (p.42).
7. Do we know about the use of any other carcinogens aside from
- asbestos
- **REDACTED**
8. Can the R&D Council shed more light-on chemical inquiry and illness in labs? I question the applicability of using chemical source rates from manufacturing. (p.46)
9. I do not feel that our LWDI rate will drop 50% as noted on p.49, due to the fact that our inquiries, for the most part, do not occur in the labs.
10. Are our emissions processed to reduce contaminants & diluted with additional air? If not, I think its a very good idea *to do so*.
11. The Medical Consultation Aspect (p.57) needs a lot more detailed work. (ie guidelines)

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PLAINTIFF'S EXHIBIT

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