

1. PERMISSIBLE EXPOSURE TO AIRBORNE CONCENTRATIONS OF ASBESTOS FIBERS

The proposed 8 hour time weighted average concentration limit of 0.5 fibers/cc and the ceiling concentrations limit of 5 fibers/cc are the most controversial requirements.

1.1 Exposure limit rationale based on British experience

In developing the rationale for the 0.5 fiber limit (TWA), considerable weight was given to Great Britain's 2 fiber/cc limit, and improved conditions from their 1931 Factory Regulations. While it is understood that fiber count records were not available, our members contend that their friction materials factories are far cleaner today than their Great Britain counterparts of 1933 "when important improvements in work practices had been achieved." Our members doubt that levels below 10 fiber/cc were achieved until Great Britain went to the 2 fiber/cc limit. And, knowledgeable individuals believe that the British factories have not achieved this 2 fiber/cc level on a sufficiently consistent basis that would preclude citations and fines in the United States. We believe that alleged British compliance with the 2 fiber/cc limit is pertinent to the establishment of the reduced 0.5 fiber/cc limit in the United States.

1.2 Manufacturers have not achieved the July 1, 1976 2 - fiber/cc limit

Members working to meet the current 5 fiber/cc limit (and the 2 fiber/cc July 1, 1976 limit) state that in areas where they have concentrated efforts--mixing, pressing, grinding--they will run into counts in excess of 5 fiber/cc. Within days a State OSHA inspector will check the same area and it will be indicated the area is in compliance. While the