MAREMONT CORPORATION

INTER-OFFICE CORRESPONDENCE

TO: R. C. Rogers

DATE: April 15, 1976

FROM: A. P. Staszak

COPIES TO: R. A. Hemmelgarn

LOCATION: Paulding

SUBJECT: PROPOSED OSHA ASBESTOS STANDARD - AIA RESPONSE

XC RJT,

AIA amendments to the proposed asbestos standard consist of rewording certain sections for clarification and complete revision of other sections because of being too stringent and without justification.

Pertaining to Maremont, the areas having greatest significance are as follows:

1. Reduction of Exposure Standard

   AIA proposes a 2 fibre TWA and a 10 fibre ceiling in lieu of a .5 fibre TWA and 5 fibre ceiling. Their contention is that no new medical evidence has been compiled to justify such a reduction.

2. Regulated Area (Roster Requirement)

   AIA recommends deletion of daily roster requirement. This would be a duplication of effort as payroll records would already indicate individuals assigned to those areas.

3. Dust Monitoring (Frequency)

   AIA proposes that if monitoring shows that an employee's exposure is above either limit, monitoring shall be repeated as often as necessary to verify reductions made from implementation of a compliance program, but no less frequent than once every 6 months. OSHA proposal requires monitoring once every month.

4. Methods of Compliance (Mechanical Vent.)

   AIA suggests that the phrase be changed to read: "measurements made to demonstrate effectiveness of a system shall be made as frequently as required in accordance with sound engineering practice." OSHA proposal requires measurements be taken every 3 months.

PLAINTIFF'S EXHIBIT

MAR-494

MAR 007132

5. Personal Protective Clothing/Hygiene Practices

In the present standard the wording holds the employer totally responsible for seeing that employees wear protective clothing, wash hands before smoking, eating, drinking, etc. AIA change would call upon the employer to instruct employees as to the medical consequences rather than hold the employer responsible for enforcement.

Of all the aforementioned regulations, reduction of the exposure standard would be "the straw that broke the camel's back." Although the effect of the following would be of a lesser degree, dust monitoring frequency, measurement of dust control systems and regulated area roster requirements would be quite burdensome and expensive.

A. P. Staszak
OSHA/EPA Compliance Director

APS:llw