

FILE NAME: Friction Materials Standards Institute (FMS)

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Recommended Revisions to OSHA Asbestos Standard

FRICTION MATERIALS STANDARDS INSTITUTE, INC.

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September 23, 1974

Mr. R. H. Mereness
Asbestos Information Association/NA
1660 L Street, NW
Washington, D.C. 20036

Subject: Recommended Revisions to OSHA Asbestos Standard

Dear Bob:

The committee members within the Friction Materials Standards Institute responsible for monitoring asbestos regulations have reviewed your Association's recommended revisions and suggested work practices for the OSHA Asbestos Standard.

An overall comment is that your proposal is well prepared and that it represents a realistic approach which if accepted will safeguard the health of employees who work in the manufacture of asbestos-bearing friction materials.

There is, however, one item on which committee members have expressed concern, and that is the recommendation to add a new section (d) (1) (vi):

"(vi) Where respirators are permitted under sub-division (iv) of this subparagraph, their use shall be subject to the following limitations:

1. Respirator shall not be worn for more than 60 minutes in any 8-hour shift.
2. Respirator shall not be worn for more than 30 minutes in any hour in the 8-hour shift.
3. Exposures do not exceed 10 times the permissible limits and protection can be achieved by use of an air purifying respirator."

It is felt that addition of this sub-paragraph vi is unnecessary, and that addition of sub-paragraph iv is sufficient. In addition, it is felt that the limitations indicated by suggested sub-paragraph vi may be confused with exceptions permitted by existing sub-paragraphs i, ii, iii and iv.

Your Association's consideration of these comments will be appreciated.

Sincerely,

E. W. Drislane

EWD/lmc

PLAINTIFF'S
EXHIBIT

NO. BX-101