



An IC Industries Company

November 7, 1975

C & M Axle Division  
P.O. Drawer 9269  
Highway 80 West  
Montgomery, Alabama 36108

Attention: Mr. W. Kroell

Dear Sir:

Have you been alerted to the Department of Labor Docket #H-033 which appeared in the October 9, 1975, Federal Register?

This proposed revision to OSHA Asbestos Standard (29CFR1910.1000) covers a broad field, such as adequate cautioning to users of asbestos, employee information and training, signs and labels, medical records, etc.

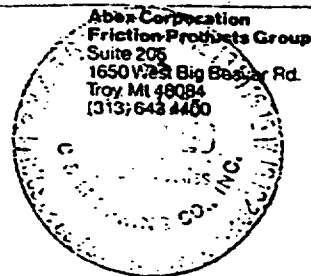
The present level of asbestos exposure is five (5) fibers per cubic centimeter. On July 1, 1976, the limit will be dropped to two (2) fibers per cubic centimeter. We already meet or exceed this level at our various plants and consistently support improved regulations for the health and safety of our employees.

We are concerned about many of the individual proposals covered in Docket #H-033. However, our primary concern is with the proposed reduction to .5 fibers per cubic centimeter. This is such a drastic reduction that we feel you should be alerted to the far reaching effects such a regulation would have on your business.

At this time, we simply do not know if .5 fibers per cubic centimeter is attainable. Considerable investigation and time will be required to determine this. We must proceed cautiously. If the industry determines that .5 fibers per cubic centimeter is unattainable, it could mean the demise of the asbestos friction material industry.

Over 95% of the automotive applications in the United States today use asbestos friction materials. The implications of the possibility of shutting down our transportation system are very real. We feel that utmost caution must be used by this potentially over-zealous regulatory agency in establishing any new asbestos fiber limit.

A copy of the proposal is attached for your information and use in the preparation of an urgent response. An expression of your concern is specifically requested to be submitted in quadruplicate to the:



VPD-153-0000975

DANA-322

Mr. Kroell

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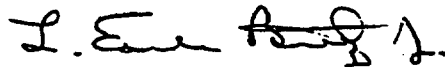
11/7/75

Docket Officer  
Docket #H-033  
U.S. Department of Labor  
Room N-3620  
200 Constitution Avenue, N.W.  
Washington, D.C. 20210

This must be postmarked on or before December 8, 1975.  
It would be most appreciated if you would forward a  
copy of your response to my office.

Thank you for your usual fine consideration and  
cooperation.

Very truly yours,



L. Earle Bretz, Jr.  
Manager - Original Equipment Sales

/ph

Attachment

VPD-153-0000976

6. Engineering controls are required to reduce the exposure, even if they won't result in asbestos levels within the allowable limits. Periodic exhaust system checks are required.
7. A medical control program with preplacement, annual and termination exams is required.
  - a. X-rays, pulmonary function tests, sputum cytology and medical history are included.
  - b. There are provisions made for an employee's refusal to take the examination.
8. A compliance program must be developed and made available, on request, to OSHA. The program must be revised and updated every six months.
9. Employees whom the doctor says cannot function normally while using a respirator shall be, to the maximum extent possible:
  - a. Rotated to another job.
  - b. Given the opportunity to transfer to another job, subject to the following requirements:
    - i. Duties he can perform.
    - ii. Same employer.
    - iii. Same geographical area.
    - iv. Same seniority, status and rate of pay.
10. Danger signs and labels, housekeeping and waste disposal provisions are included.
11. Extensive recordkeeping requirements are included with respect to asbestos monitoring and medical examinations. Monitoring records must be made available to employees upon request. Medical records must be made available to employees' doctors upon request. All records must be made available to OSHA upon request. Records must be maintained for 40 years or an employee's employment interval plus 20 years, whichever is longer.
12. Employee training programs, both preplacement and annual, are required. The programs are to include the how and why of operating procedures, medical examinations, etc. Employees are to have access to the asbestos standard and training materials.

## PROPOSED OSHA ASBESTOS STANDARD

October 9, 1975

On October 9, 1975, a new proposed OSHA asbestos standard was published in the Federal Register. The proposed standard has stricter requirements than the present OSHA standard. A summary of the proposed standard follows.

1. The Construction Industry is excluded.
2. Applies to all locations where asbestos or products containing asbestos is manufactured, processed, packaged, stored, applied, used or otherwise handled.
3. The allowable eight-hour time-weighted average concentration is 0.5 fibers/cc and the allowable ceiling concentration is 5 fibers/cc. (The present standard calls for a 2.0 fiber/cc average and 10 fiber/cc ceiling effective on 7-1-76.)
4. Regulated areas must be established where the allowable concentrations are exceeded.
  - a. Only authorized employees may enter area.
  - b. A daily roster of all persons entering the area must be maintained.
  - c. Respirators and respirator programs are required.
  - d. Employees must be allowed to leave the area to wash their face and clean their respirator.
  - e. No eating, drinking, smoking or chewing is allowed in the area.
  - f. Change rooms are required with separate lockers, showers, etc.
  - g. Employees must be provided daily with clean and dry protective clothing to include coveralls, head covering, gloves and foot covering.
5. Monitoring is required in all exposure areas.
  - a. Monthly if greater than the allowance exposure.
  - b. Quarterly if within the allowable exposure.
  - c. Can be discontinued if two consecutive samples within a certain time frame are within the allowable levels.
  - d. Not every employee need be monitored.
  - e. Required after every process change.