

work place for the uncomfortable clothing. To require air-conditioning in the work place while also maintaining the extensive exhaust systems would be prohibitively expensive—if it can be done at all—because one is at cross purposes with the other. Costs also will be increased because of the new monitoring requirements.

As regards the effect on competition it was pointed out that this may very well be the trigger which would close down some marginal operations with a resulting transfer of jobs outside of the U.S. Even in Great Britain where much medical information has been gathered they have not gone to the 0.5 fibers/cc limit. It does not appear that Great Britain has sufficient medical evidence to support such a limit. Countries on the continent do not have this 0.5 fiber/cc limit. The Latin American countries have no limits. As regards the effect on employment and competition, the huge capital expenditures required for the U.S. plants may very well export additional jobs.

While some of the procedures recommended for handling asbestos and removing the worker from contact with the product may show labor saving results, the actual level of exposure to the remaining workmen from these changes still will be quite high.

There would be considerable costs for members in the friction materials industry to requalify brake blocks and heavy duty segments for the requirements of the NHTSA Standard 121 which went into effect during 1975. There has been a considerable expenditure of funds for Standard 105-75 (hydraulic brake systems standard) by many members. Any changes in the processing or compounding of friction materials necessitated by the proposed OSHA standard would add additional costs for manufacturers in requalifying their materials. The friction materials industry in particular is caught between the forces of improved performance of braking materials along with restrictions on how to manufacture and distribute their materials. There may be considerable testing to requalify materials if there should be a change in processing or compounding.

As regards the costs to consumers and society in general the industry does not know what can be done if it is necessary to remove asbestos from brake lining. The industry could be subject to 5 - 10 years of serious dislocation. In addition to the problems with the OSHA standard that appear evident, costs can not be quantified at this time. Industry needs more time to respond to these far reaching regulations.

One of the requirements for record keeping stated that the records must be maintained for forty years, or for an employment interval plus 20 years, whichever is longer. This is a considerable record keeping requirement. However it was stated that perhaps this is necessary in order for subsequent study of the epidemiology of asbestos. It was suggested that perhaps this is one of the new proposals that can be lived with.

In prior meetings and at prior workshops the problem of correlation of fiber count has been discussed. In general there seems to be some agreement that different experienced counters may total up results showing as much as a 30% variation in counts from the same sample. This is already a problem. However these counts where the 30% variation is evidenced are in the 2 fibers per cc to 5 fibers/cc area. A 30% difference with a 5 fiber/cc count is 1.5 fiber/cc. Here, OSHA is asking for a concentration limit of 0.5 fibers/cc when with current observations there can be variations of as much as 1.5 fibers/cc.
From counts of 0.5 fibers/cc not only does technology get