APPENDIX 4
Document No. 15

ASBESTOS INFORMATION ASSOCIATION
NORTH AMERICA
1660 L Street, N.W. / Washington, D.C. 20036 / (202) 223-4845

PLAINTIFF'S EXHIBIT
AIA-56

15 July 1974

Dr. Daniel P. Boyd
Director, Office of Standard Development
Occupational Safety and Health Administration
1726 M Street, N.W.
Washington, D.C. 20036

Dear Dr. Boyd:

The Asbestos Information Association/North America consists of twenty-two member companies and associations which represent three-quarters of the asbestos mining, milling, manufacturing, and importing industry of the United States. The Association maintains active liaison with trade and technical groups related to the industry. Over a period of time and on numerous occasions, we have consulted with key representatives within the Occupational Safety and Health Adminis tration in a cooperative effort to develop sound safety and health regulations for the industry. We are pleased to enjoy a close working relationship with OSHA.

When the Association learned of plans to revise the Asbestos Standard, as first published in the Federal Register, Vol. 37, No. 110, June 7, 1972, we spoke with Mr. Lewis Cox, Mr. Gerald Scannel and Dr. John P. O'Neill to advise that we would be pleased to take on the task to recommend revisions and develop work practices. We submit, herewith, our recommendations for revising the OSHA Asbestos Standard, as reprinted in the Federal Register, Vol. 39, No. 125, June 27, 1974. We also enclose suggested work practices in the following areas:

A. Unloading and Storing Bagged Asbestos Fiber.

B. Introduction of Asbestos Fiber into Manufacturing Processes.

C. Asbestos Dust and Scrap Removal and Disposal.

D. Housekeeping in the Asbestos Industry.

Please note that we have addressed only those areas where the Association feels the necessity for clarification or better-defined practical application in the interests of ready compliance within the spirit of the Act. Areas not addressed are considered reasonable and enforceable.

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The Association's Standards and Technical Committee, assigned to the task of preparing revisions and work practices, consists of environmental control engineers, industrial hygienists, and safety and health directors. The Committee has consulted extensively with medical, management, labor and other disciplines within the industry. Edmund M. Fenner of the Johns-Manville Corporation serves as chairman of the Committee. Mr. Fenner is well known for his many years of experience in the occupational safety and health field. He is a regular member of the lecturing staff for NIOSH and participates in numerous national technical programs on occupational safety and health as concerns the asbestos industry. A list of other members of the Committee is attached.

The Association acknowledges the importance of disseminating information concerning asbestos regulations and work practices throughout the industry and is performing this function. Much has been done and much more will be done. We are proceeding with the development of work practice materials for member customers who are fabricators and processors of asbestos fiber and fiber-containing products.

We can report that there is an industry-wide appreciation of the health problems associated with asbestos dust in the workplace, requiring realistic understanding and remedial action where necessary.

We are indebted to Dr. O'Neill and Mr. Harry Gilbert for their outstanding assistance and professional guidance. We shall be pleased to meet with you or representatives of your office to discuss our recommendations and any other matters at your pleasure and convenience.

Sincerely yours,

R. H. Mereness
Executive Director

RHM/cg

Enclosures: (1) Recommendations for Revision, OSHA Occupational and Health Standard for Exposure to Asbestos Dust
(2) Suggested Workplace Practices in the Asbestos Industry

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STANDARDS AND TECHNICAL COMMITTEE

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