PLAINTIFF'S
EXHIBIT
AIA-115

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ASBESTOS INFORMATION ASSOCIATION
1800 L Street, N.W., Washington, D.C. 20036 (202) 223-3355

8 April 1976

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

Dear Sir:

The 120-day extension for comment on the proposed revision to the OSHA asbestos standard; from December 8, 1975 to April 9, 1976, has permitted this Association the time necessary to sponsor an industry-wide review of the proposal and its effect on the asbestos using industry within the United States.

The analysis, comments, and recommendations pertaining to the proposal are respectfully submitted in an industry effort to cooperate fully with the Department of Labor in the development of a reasonable and practicable standard for the protection of workers in thousands of work places, where asbestos products are manufactured or otherwise processed. The task force effort reached out to all sectors of the asbestos industry, excepting construction. The results of this work are contained in the two volumes, appended hereto. The first volume contains summary comments and recommendations prepared by the task force chairman, Guy G. Gabrielson, Jr.; a statement on the scientific-medical issues raised in the proposal prepared by Hans Weill, M.D.; and detailed comments on the proposed standard prepared by the Standards and Technical Committee of the Association under the chairmanship of Harrison B. Rhodes, Ph.D. The second volume is the technological feasibility and economic impact study prepared by the independent consultant firm, Roy F. Weston, Inc.

We shall be pleased to further communicate or meet with any officials within OSHA to discuss the findings and recommendations presented herewith.

We believe a public hearing on this matter will best serve the interests of asbestos workers, the employers within the industry, and the general public. We request a public hearing at the soonest practicable date.

Sincerely yours,

R. H. Mereness
Executive Director
Enclosures: (in quadruplicate)
RHM:v

The following companies and trade associations have endorsed this statement:

A-Best Products Company
Abex Corporation
Aeroquip Corp/Gustin-Bacon Div.
Alsop Engineering Corp.
Amatex Corp.
American Biltrite Inc., (AMTICO)
American Public Transit Asn.
American Trucking Asn.
Asbestos/Cement Pipe Producers Asn.
Asbestos Textile Institute
Atlas Asbestos Co. (California)
Auto-Friction Corp.
Automotive Parts Rebuilders Asn.
Baltimore Air Coil Co.
Beaver Industries, Inc.
Bird & Son, Inc.
Borg-Warner Corp. (Borg & Beck Div.)
Breiner Co.
Brown Insulating Systems
Brunswick Fabricators, Inc.
Cellulo Co.
Cement Asbestos Products Corp.
Certain-teed Products Corp.
Chemical Sealing Corp.
Congoleum Industries, Inc.
David Fabricators of New York, Inc.
Dresser Industries (Maccobar Div.)
Drilling Specialties Company
Eaton Corporation
Fluid Sealing Asn.
Foseco-Minsep, Inc.
Friction Materials Standards Institute
GAF Corp.
Garlock, Inc.
Gatke Corp.
General Dynamics Corp.
Gibson-Homans Inc.
Grant Wilson, Inc.
Gulf States Asphalt Co.
Gypsum Drywall Contractors Intern'l
Haveg Industries, Inc.
Hollingsworth & Vose Co.
Industrial Safety Equipment Asn.
International Fiber Inc.
Jim Walter Research Corp.
Johns-Manville Corp.
Karnak Chemical Corp.
Kentile Floors , Inc.
Lamons Metal Gasket Co.
Latex Fiber Industries
Lipe-Clutch Products Corp.
Lukens Chemical Corp.
Mannington Mills, Inc.
Maremont Corp.
Markham Corp.
Milchem, Inc.
Molded Materials Company
Monsey Products Co.
Munters Corp.
National Asn. of Cement Board Fabricators
National Asn. Filter Manufacturers
National Asn. Plastic Distributors
National Electrical Manufacturers Asn. (Laminating Division)
National Friction Products Corp.
National Gypsum Company
National Insulation Contractors As
Nicolet, Inc.
Norplex, Inc. (U.O.P)
North American Asbestos Corp.
PPG Industries (Chemical Div.)
Palmer Asphalt Co.
Plastics Engineering Co.
Quality Gasket & Mfg. Co.
Raybestos-Manhattan, Inc.
Resilient Floor Covering Institute
Resinoid Corp.
Rostone Engineering Corp.
Royal Industries
Shipbuilders Council of America
Southern Asbestos Co.
Stanhope Products Co.
Supradur Manufacturing Corp.
Synthane-Taylor Corp.
Thiokol Corp.
Tremco, Inc.
Trumbull Asphalt Co.
Union Carbide Corp.
Uvalde Rock Asphalt Co.
Vermont Asbestos Group
Wagner Electric Corp.
Western Slate Co.
Wisconsin Gasket & Mfg. Co.