042447

American Mutual Insurance Alliance
20 North Wacker Drive
Chicago, Illinois 60606

2/14/72

Attn: Mr. Richard Bleier, Secretary
Industrial Hygiene Subcommittee

Dear Dick:

Re: Criteria Document and Standard for Exposure to Asbestos Dust.

It is not easy to critique the large volume of material you sent on this subject especially without comparable documenting material.

Frankly, rule 1910.3a appears to be written by Selikoff et. al. to cover insulation workers in shipyards and construction sites and it will be used to cover all workers handling asbestos. However, it is a very difficult rule to implement, especially the paragraphs covering the various recommended respirators to be used as a function of the airborne fiber count (pg. 467 last column).

Considering the low T.L.V. (5 fibers/ml) recently established, it is surprising that they permit concentrations to exceed 250 fibers/ml (or 500 fibers/ml) even with a positive pressure supplied air respirator and limited to 15 minutes in an hour, but not for more than 5 hours in an 8 hour day. Can you imagine how difficult this would be to monitor or control?

The standard is not clear concerning the difference between a 'powered filter positive pressure respirator" and a "positive pressure supplied air respirator' recommended for different airborne concentrations.

I don't believe that anyone can object to reducing the T.L.V. from 12 to 5 fibers/ml. since the ACGIH 1970 list has also done so. But reducing the T.L.V. to 2 fibers/ml is not justified by the Criteria Document.

Method (2) under monitoring is called "Environmental", but is defined as monitoring in all areas in which employees are exposed to concentrations of asbestos etc. In this rule, I see the influence of Selikoff, where he is concerned with carpenters, electricians, welders etc., in shipholds or construction sites, the work in areas near the insulation crews. Of course as industrial hygienists we consider this equally as worker exposure and we consider "Environmental" as exposure to the general public outside the plant.

EXHIBIT P-879

CRMC-Motley1000-Subj-004623

I see no serious objection to the Sign Specifications, since OSHA has include this type of designation in the act. However, I don't believe it is necessary to go beyond the statement, "Hazard dust area". If the statement starting with "asbestos dust may cause asbestosis etc. etc. (pg. 468, first column) is used then similar statements must be used for almost all toxic materials in the T.L.V. list. You can imagine the impact on clothing with such a notice - and such detail will not improve control but could cause panic.

Criteria Document

Now that I am scrutinizing this document more closely it appears that the purpose of the document is to reduce the T.L.V. of asbestos to 2 fibers/c.c. (and no exposure over 10 fibers/c.c.): (pg. I-1). Does this mean that the standard mentioned above has already been accepted and this hearing intends to discuss the further lowering of the T.L.V.? I am not clear about this!!

Apparently this is true because pg. I-8 shows use of different respirators at lower airborne concentrations than in the standards mentioned above.

I have read this Criteria Document and although there is a great deal of documentation to convince one of the hazards involved with asbestos fibers there is very little to justify the reduction of the T.L.V. to 2 fibers/ml. In fact on page V-10 under Basis for Recommended Standards they state that, "the number of studies that have collected both environmental and medical data and with a significant number of exposed workers is not sufficient to establish a meaningful standard based upon this scientific data". In another place (page VII -13) they state that, "There are no experimental dose-response data that can be used in estimating a work place air standard for asbestos".

However, they go on to use the following reasons for changing the T.L.V. to 2 fibers/ml:

1. The British have used 2 fiber/ml for several years.
2. Some studies have shown continued evidence of biological effects due to exposure to asbestos dust at less than the old T.L.V. of 5 mppcf (previous standard for total dust count using the light field method).

However, no study has shown certified evidence of biological effects at or below the relatively new T.L.V. of 5 fibers/ml. In fact this new T.L.V. is so new and has been used for such a short time (1 or 2 years) that any experience indicates most exposures still are over the 5 fibers/ml limit.

I suggest therefore that the 5 fibers/ml limit be used for a long enough period to permit industry to adhere to this limit after which NIOSH can study its effects. If after a reasonable period a well documented study indicates that the T.L.V. should be lowered it could be lowered in the future. The argument that 2 fibers/ml is feasible because studies show that many operations can be kept at that low level is no reason to burden industry at this low level because it is an extra safety factor.

I also suggest that the Sign Specification refer to the occupational hazard by a statement such as "Hazardous Dust Area" rather than details of biologic effects which are open to question and may cause hysterical attitudes in some readers.

cc: L.D.H. File

CRMC-Motley1000-Subj-004624