UCC RESPONSE TO OSHA'S ISSUANCE OF AN
EMERGENCY TEMPORARY STANDARD (ETS) WHICH REDUCES
PERMISSIBLE EXPOSURE LEVELS (PEL) FROM 2.0 TO 0.5 F/CC

We do not expect any short-term adverse effects on our operations in California nor on the operations of most of our customers. We do not oppose a review of the asbestos standard through normal rulemaking procedures, but we feel that the issuance of an ETS is unnecessary and inappropriate at this time.

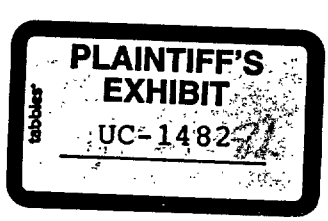
We are not aware of any scientific proof that the current PEL of 2 f/cc is unsafe, especially for chrysotile asbestos. However, it is prudent to reduce exposures below this level to the extent feasible.

Normal rulemaking procedures would provide an excellent forum for discussing the many complex issues surrounding the asbestos issue: health effects, monitoring limitations, risk assessment, technical feasibility, fiber type, industrial process, etc. The hearings should attract world experts and result in a reasonable and permanent solution acceptable to all parties.

We understand that the ETS consists of some 200 pages. We may have additional comments after reviewing the document in its entirety.

Draft by J. L. Myers
11/2/83

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Union Carbide trial exhibit UC-1482: J. L. Myers Draft of UCC Response to OSHA's Emergency Temporary Standar… Published by AsbestosClaims.Law
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