Johns-Manville Corporation

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F. J. Solon, Jr.
Vice President
Environmental Affairs

November 16, 1973

The Honorable John H. Stender
Assistant Secretary, Occupational Safety & Health
U.S. Department of Labor
Fourteenth St. and Constitution Ave. N.W.
Washington, D.C. 20210

Dear Secretary Stender:

On October 5, 1973, I sent a letter to you urging the establishment of a 15-man Asbestos Standard Advisory Committee.

I have recently had the opportunity to jointly meet with both Mr. Gerard F. Scannell, Director, Office of Standards, and John P. O'Neill, Chief, Division of Health Standards, to discuss the reopening of the OSHA Standard for Exposure to Asbestos Dust. During this meeting, Mr. Scannell indicated that OSHA had decided against the establishment of an Asbestos Standard Advisory Committee and instead had elected to follow a new procedure which would include the use of outside consultants.

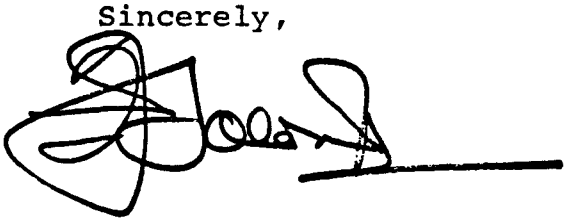
As it was explained by Mr. Scannell, OSHA will prepare a draft of a new proposed asbestos standard. Outside consultants will then be called in on an individual basis from labor, industry and the medical and scientific communities to review this draft. Following such review, OSHA will then arrange visits to representative plants in the asbestos industry to determine the practicality of the draft proposed standard. Following these visits, consideration will be given to bringing all of the outside consultants together in a group meeting to make a final review of the draft. It is assumed that as necessary, during different stages of the above procedure, the draft will be informally revised as necessary. At the conclusion of the above procedure, a notice of a new proposed asbestos standard will be published in the Federal Register for comment, with a possibility of a hearing being scheduled following public comment.

Mr. Scannell has now indicated to us that you have decided to follow the procedure outlined in the preceding paragraph. Assuming this is the case, we fully support your decision. We feel that such a decision reflects an intelligent and sophisticated approach to prepare, review and evaluate any modification of the OSHA Standard for Exposure to Asbestos Dust, and we therefore hope that the procedure will be followed as outlined to us.

As I have indicated to Messrs. Scannell and O'Neill, Johns-Manville is desirous of providing OSHA with whatever cooperation and assistance may be necessary in carrying out this endeavor. We have pledged our cooperation and every effort will be made on our part to insure that OSHA receives whatever assistance it may need. In this regard, the Asbestos Information Association is currently in the process of forming a Technical Committee, composed of leading industry experts in the area of environmental engineering and industrial hygiene, to accomplish this aim. We feel that the establishment of meaningful communication between industry and the Department of Labor will prove to be of considerable value in the development of standards.

Inasmuch as we have never had the opportunity to personally meet, I would be very pleased to have the opportunity to sit down with you and your people to discuss the reopening of the asbestos standard in more detail and your thoughts as to how Johns-Manville can be of assistance to OSHA in the future. Business frequently brings me to Washington and I would be glad to meet with you any time at your convenience.

Sincerely,



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