

# **NIOSH**

PB90-130048

## Comments to DOL

PB90130048



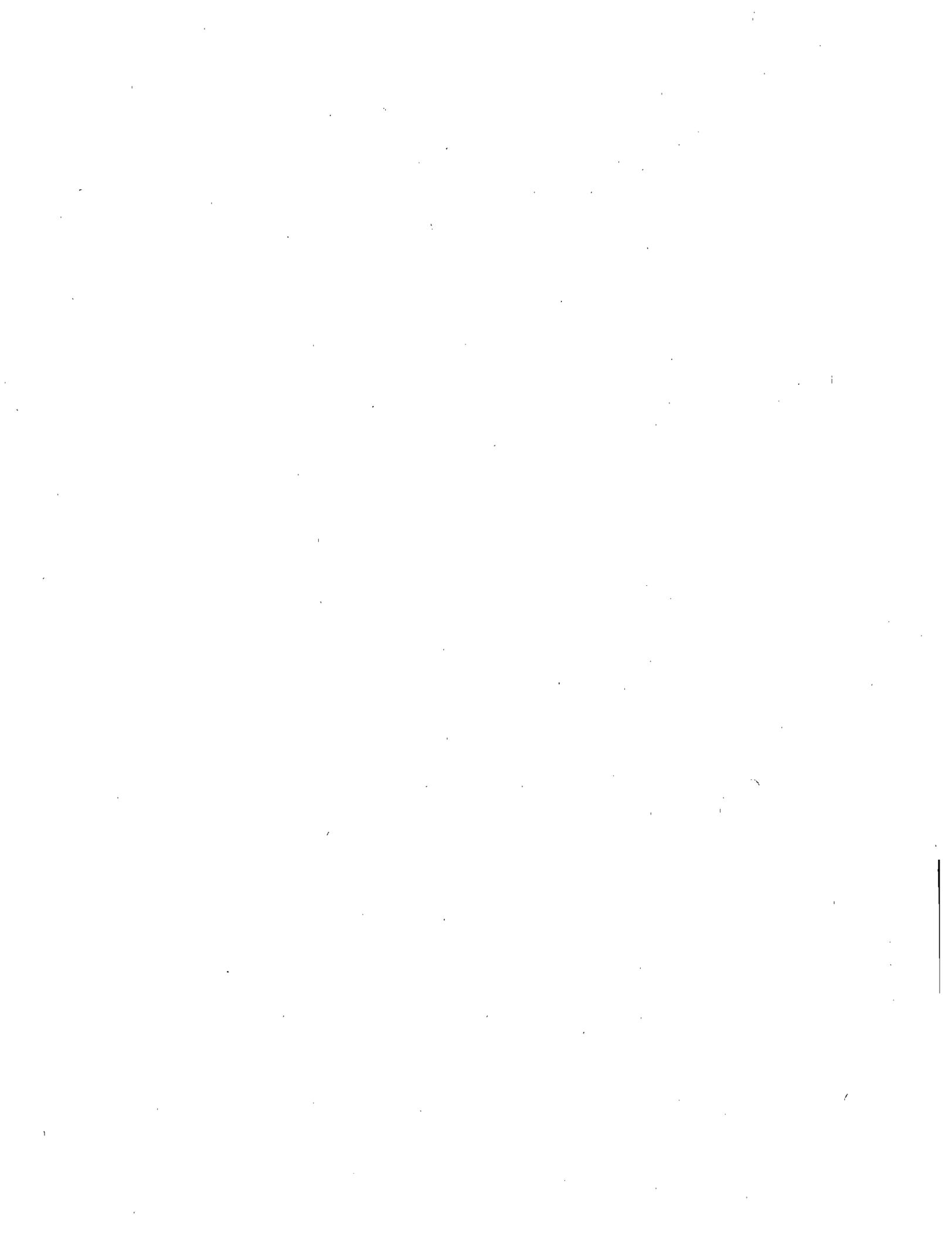
**COMMENTS OF THE  
NATIONAL INSTITUTE FOR OCCUPATIONAL SAFETY AND HEALTH  
ON  
THE OCCUPATIONAL SAFETY AND HEALTH ADMINISTRATION'S  
FINAL RULE ON OCCUPATIONAL EXPOSURE TO ASBESTOS,  
TREMOLITE, ANTHOPHYLLITE, AND ACTINOLITE**

**29 CFR Parts 1910 and 1926  
Docket No. H-033C**

**U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES  
Public Health Service  
Centers for Disease Control  
National Institute for Occupational Safety and Health**

**07/17/86**

REPRODUCED BY  
U.S. DEPARTMENT OF COMMERCE  
NATIONAL TECHNICAL INFORMATION SERVICE  
SPRINGFIELD, VA. 22161





## Comments to DOL

JUL 17 1986

Mr. John Pendergrass  
Assistant Secretary, Occupational Safety  
and Health Administration  
200 Constitution Avenue, N.W.  
Washington, D.C. 20210

Dear Mr. Pendergrass:

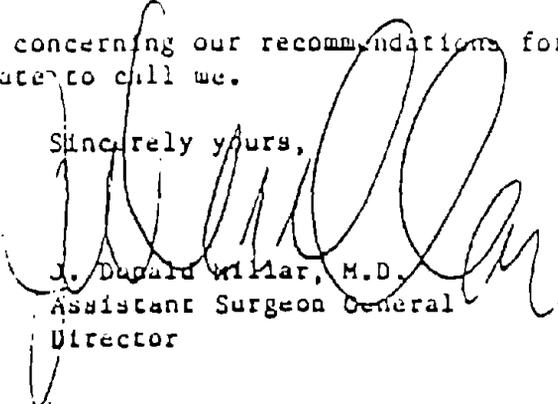
At your request, the purpose of this letter is to restate the existing NIOSH definition for asbestos. As you are aware, a recent internal NIOSH memorandum by Mr. Robert Glenn, Director of our Division of Respiratory Disease Studies, has been interpreted by some as new NIOSH policy concerning the definition of asbestos. To the contrary, this memorandum by Mr. Glenn does not alter the NIOSH definition of asbestos as recommended for regulatory purposes. It remains as stated in our June 21, 1984, testimony at the OSHA Public Hearing for rulemaking on a new asbestos standard:

"Asbestos is defined to be chrysotile, crocidolite, and fibrous cummingtonite-grunerite including amosite, fibrous tremolite, fibrous actinolite, and fibrous anthophyllite. The fibrosity of the above minerals is ascertained on a microscopic level with fibers defined to be particles with an aspect ratio of 3 to 1 or larger."

There currently is insufficient evidence documenting a health effect from exposure to nonfibrous cummingtonite-grunerite including amosite, tremolite, actinolite, and anthophyllite and therefore the nonfibrous forms of these minerals are excluded from the NIOSH definition for asbestos.

If you have further questions concerning our recommendations for asbestos, please do not hesitate to call me.

Sincerely yours,

  
J. Duquard Wilfong, M.D.  
Assistant Surgeon General  
Director





<b>REPORT DOCUMENTATION PAGE</b>	1. REPORT NO.	2.	3. Recipient's Accession No. PB 90 130048 /AS	
4. Title and Subtitle NIOSH Testimony on Occupational Exposure to Asbestos, Tremolite, Anthophyllite, and Actinolite by J. D. Millar, July 17, 1988			5. Report Date 86/07/17	
7. Author(s) NIOSH			8. Performing Organization Rept. No.	
9. Performing Organization Name and Address NIOSH			10. Project/Task/Work Unit No.  11. Contract (C) or Grant(G) No. (C) (G)	
12. Sponsoring Organization Name and Address			13. Type of Report & Period Covered  14.	
15. Supplementary Notes				
16. Abstract (Limit: 200 words) This testimony restated the definition currently in place at NIOSH for asbestos (1332214). Concern had arisen following the issuance of an internal memorandum by Mr. Robert Glenn who was director of the Division of Respiratory Disease Studies at NIOSH. This memorandum did not change the position of NIOSH concerning the definition of asbestos as it concerns regulatory purposes. The definition remained as follows. Asbestos is defined to be chrysotile (12001295), crocidolite (12001284), and fibrous cummingtonite-grunerite including amosite (12172735), fibrous tremolite (14567738), fibrous actinolite (13768008), and fibrous anthophyllite (17068789). The fibrosity of the above minerals is ascertained on a microscopic level with fibers defined as being particles with an aspect ratio of 3 to 1 or larger. At present the evidence documenting a health effect from exposure to nonfibrous cummingtonite-grunerite including amosite, fibrous tremolite, fibrous actinolite, and fibrous anthophyllite was insufficient and therefore the nonfibrous forms of these minerals were excluded from the asbestos definition.				
17. Document Analysis a. Descriptors  b. Identifiers/Open-Ended Terms NIOSH-Publication, NIOSH-Author, NIOSH-Testimony, Millar-J-D, Asbestos-workers, Occupational-exposure, Airborne-fibers, Fibrous-dusts  c. COSATI Field/Group				
18. Availability Statement			19. Security Class (This Report)	21. No. of Pages 14
			22. Security Class (This Page)	22. Price

