

MAR 30 1976



Health and Welfare
Canada

Santé et Bien-être social
Canada

Health Protection
Branch

Direction générale de la
protection de la santé

Room 112
Environmental Health Centre
Tunney's Pasture
Ottawa, Ontario
K1A 0L2

23 March 1976

Mr. P.G. Brown
Staff Manager
Standards Development Division
ASTM
1916 Race Street
Philadelphia, Pennsylvania
19103

Dear Mr. Brown:

You will recall that on 3 February 1976, I sent you a Telex stating I was objecting to some of the contents of the E-34 Task Force brief to OSHA on proposed asbestos regulations. At the time, I was leaving for government trip overseas from which I returned on 12 March. As a consequence, I was unable to give in detail my objections to the documents and was unable to attend the meeting held in Montreal on 9 March. The latter meeting was set up to try and resolve the objections that were raised by many on the same document. I have received today, 23 March 1976, the minutes of that meeting together with a memorandum from the Recording Secretary, M. Cossette, requesting that he or you be advised by 25 March 1976 of any additional objections.

It is unfortunate but perhaps unavoidable that various job commitments would prevent me from attending the recent meeting held on this subject and I regret not having had the occasion to personally present my views on the matter. I suspect however from reading the minutes of the 9 March meeting that it is doubtful that my fundamental objection (see later), had I been present, would have been sufficiently persuasive to the majority present. In any case, I will gladly accept any criticism that could eventually be directed at me on the subject of attendance at meetings.

.../2

100
YEARS OF HEALTH
PROTECTION



GENEVA 1976
L'AGE DE LA SÉRIE CANADA

In view of the urgency of the situation, I choose to write to you directly with copy to Mr. Cossette and I am herewith submitting the following:

- 1) Detailed explanations of the stand I took on 3 February.
- 2) My present position with respect to the document revised on 9 March 1976.

Firstly, I wish to explain my original objections to:

- 3.1 I objected mostly to the interpretation attributed to McDonald et al that "Below a dust exposure index of 100" everything was o.k. I was happy to see that Dr. Gibbs who is closely connected with the McDonald group saw fit to object to this summary and somewhat partisan interpretation of a valuable piece of scientific research.
4. I objected to the tortured reasoning used to justify a ceiling value twice as high as those proposed by OSHA. Indeed, to say that employee protection cannot improve significantly with a lower ceiling value is a bit like saying that increasing the minimum wage from say \$3.00 to \$3.10 does not significantly increase the standard of living of a person. It may not increase it significantly but it is better than no increase at all. Moreover, to extrapolate the mine and mill data of McDonald to all asbestos workers is presumptuous. The Mount Sinai team which examined Québec asbestos miners more than a year ago, did not share, after completing its study, the general euphoria shown by certain interpreters of the McDonald papers. Lastly, does "no effects" mean no carcinoma or just no asbestosis?
7. As a physician, research scientist and public servant, I believe that if it is fair to say that physicians are expected to be excessively cautious in their opinions, it would be as fair (or as unfair) to say that asbestos industries spokesmen (which occasionally are physicians) are expected to be excessively unconcerned with the health of asbestos workers. The role of the physician in industry is to apply good preventive medicine which results in increased employee protection. Does that make him unreliable to company spokesmen?
- 12.1 The spokesmen for certain sectors of the asbestos industry are pushing the line that what OSHA is proposing is technologically and economically impossible. This assertion, like any others, is unverifiable and deserves the type of treatment given by government authorities to similar laments produced by various polluters challenged by EPA in the past. I was happy to see that a member of the Task Force also objected to the cheap statements of 12.1.

.../3

14.2 The statement was ridiculous and untenable since it suggested background levels were close to 0.5 fiber/cm³, whereas measurements have shown background concentrations to be orders of magnitude smaller. Dr. Gibb's comments on the matter was, to say the least, very charitable.

Secondly, my present position with respect to the revised document.

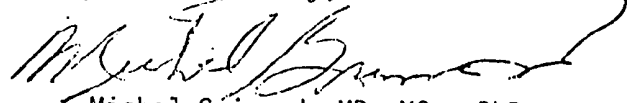
The 9 March meeting which, as I explained before, I could not attend, was useful in that some of the more glaring deficiencies were removed and the resulting document is less offensive or, at least, less likely to be immediately seized upon as the expression of a group more concerned with defending the health of some parts of the asbestos industry than with protecting the health of the workers of that same industry.

Yet, the essential bias remains exemplified in the proposal of a standard significantly higher than that advocated by the world's foremost authorities, endorsed by ILO and applied in a number of civilized countries.

Since the word consensus in Webster's and other dictionaries means either (1) group solidarity in sentiment and belief or (2a) general agreement: unanimity or (2b) collective opinion, I felt on 3 January and I still feel today, it would be a misrepresentation for ASTM to present this material to OSHA as a consensus opinion of the Task Group. Clearly, the reaction to the last draft showed the consensus to be somewhat incomplete. Since it is not reasonable to expect the representative of a government health agency to endorse the rejection of a good standard and the adoption of an inferior one, I feel Webster's definition of consensus cannot apply much longer to the present membership of the Task Force with respect to the proposed comments to OSHA.

Consequently, Mr. Brown, I would ask you to note that I wish to dissociate myself from the comments voiced against the proposed OSHA standards and regulations. I would also request that notice of my strong disagreement be given to the ASTM Executive subcommittee and attached to the document.

Yours sincerely,



Michel Grimard, MD, MSc, PhD
Chief,
Health Effects Division

JNJTALC000288617

Metadata

Custodian	Legacy 1	ORIGINAL
DateMod	03/23/1976 12:00 AM	ORIGINAL
DocExt	TIF	ORIGINAL
FileName	K000095814.TIF - K000095816.TIF	ORIGINAL
ProdVol	TALC_PROD_033	ORIGINAL