

**1219-AB24-COMM-100**

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Sent: Tuesday, August 02, 2005 5:37 PM

To: zzMSHA-comments@dol.gov; bcastleman@earthlink.net;  
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Subject: Asbestos Exposure Limit Reduction

MSHA has delayed for almost 20 years to follow OSHA's lead in reducing the permissible exposure limit for asbestos 10-fold or more from 2 f/cc (2,000,000 f/cu. m.). MSHA is more than 10 years behind OSHA in further lowering the limit for exposures to 0.1 f/cc. This is disgraceful, and I am glad to see that MSHA is taking this action. I hope that it will be given priority attention until the rule is finalized and that the rule will be seriously enforced.

Asbestos minerals are widespread in the US in the soils in many if not all states. They have been documented as severe hazards to health in miners handling talc in New York state and vermiculite in Montana (and the many sites where the vermiculite was processed and used). The development of housing in areas where asbestos occurs is another potentially grave threat to public health in El Dorado County, California and other places. Identification of the hazards to miners and workers excavating in these areas by MSHA would have far-reaching benefits for public health and could prevent many needless and painful deaths. It is hard for me to imagine what would warrant a higher priority for MSHA than issuing this rule and enforcing it, in the meanwhile looking around the country for areas of greatest danger from contaminant asbestos in mining and quarrying activities.

I have investigated the hazards of asbestos and dealt with federal regulatory agencies both as a commenter and as a consultant (OSHA, EPA, FTC, CPSC) for over 30 years and have written about the public health history of asbestos ("Asbestos: Medical and Legal Aspects" 5th Ed., 894 pp., Aspen, 2005).

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