

# BRUSHWELLMAN

ENGINEERED MATERIALS

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Hugh D. Hanes  
Vice President, Environmental  
and Legislative Affairs

January 10, 1992

Mr. David J. Weitzman  
Director, Industrial Hygiene Programs  
Division, EH-412  
Office of Health Physics and Industrial Hygiene  
U. S. Department of Energy  
Washington, D.C. 20585

Dear Mr. Weitzman:

During the meeting of the Beryllium Industry Scientific Advisory Committee in Washington on October 16, 1991, you made available to us a copy of a revised draft of the proposed new DOE standard for beryllium. We have since had the opportunity to study the revisions from the first draft of the standard, as well as the DOE's explanation of the acceptance or rejection of the various changes suggested by reviewers of the first draft, including Brush Wellman.

We appreciate the opportunity afforded us to comment on both versions of the proposed standard. We would be less than forthright if we did not express our disappointment that DOE did not see fit to accept most of our recommendations which we feel are supported by our experience of over a half century. We are grateful for the insertion of language clarifying that the standard is applicable to GOCO contractors only and not to suppliers such as Brush Wellman. This removed a disturbing ambiguity present in the earlier draft.

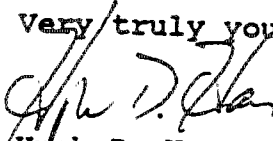
We regret that DOE apparently still intends to abandon the existing standard of over 40 years standing with no evidence, either that the existing standard is unsafe or that the new proposed standard affords any greater degree of safety. The NIOSH recommendation of 1977, which fortunately no one ever adopted, of 0.5 micrograms, introduced an element of confusion that can only be compounded by DOE's proposed introduction of a third number. A proliferation of numbers as "standards" can only weaken the acceptance, and therefore, the efficacy of the individual protection afforded. Confusion is never in the best interests of the worker.

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We would urge that DOE, before adopting the 1 microgram standard, reconsider the option of reaffirming the existing standard as a maximum permissible level but stressing that the target level for all of its operations is the lowers level technologically and economically achievable. If this turns out to be less than one microgram, so much the better. Changing the standard from two to one introduces an element of precision that is invalid and, therefore, misleading.

We are pleased to have the opportunity to share our thoughts with you in these matters of mutual concern and we hope we can continue to do so in the future.

Very truly yours,  
  
Hugh D. Hanes

HDH/rb

bcc: Richard Corle - Rocky Flats

*bcc: RFA Committee  
R.H. Royle*

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