

U.S. DEPARTMENT OF LABOR
OCCUPATIONAL SAFETY AND HEALTH ADMINISTRATION
REGION V
300 SOUTH WACKER DRIVE, ROOM 1201
CHICAGO, ILL. 60608
312 - 353-4710

R-TSA

November 7, 1974

Mr. B. R. Leach
Factory Manager
Uniroyal Chemical
Division of Uniroyal, Inc.
Painesville, Ohio 44077

Dear Mr. Leach:

Your letter of inquiry of October 24, 1974, sent to our Cleveland Office has come to us for reply.

Your question concerning limitations on concentrations of vinyl chloride exceeding five parts per million must be tied for the interpretation at this time to our OSHA sampling method used by our compliance officers. The longest sampling they are to use is never to exceed fifteen minutes. This does not exclude some shorter sampling periods such as ten minutes. A ten minute period of sampling which revealed the concentration as high as 8 ppm of vinyl chloride would be considered to be a violation of 1910.93q(c)(2).

Your other question concerns a roster of employees who enter regulated areas. Whatever method you use to develop this roster would be acceptable so long as the information alluded to in 1910.93q(e)(2) is readily available for inspection when a compliance officer may be in your plant.

If there is any other information that may be supplied, please let us know.

Very truly yours,

Edward J. Largent

EDWARD J. LARGENT
Associate Assistant Regional Director
for Technical Support

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NOV 12 '74		
ROUTE		
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UPL 02621



UNIROYAL CHEMICAL
Division of UNIROYAL, Inc.
Painesville, Ohio 44077
216-357-7574
October 24, 1974

Mr. Kenneth Bowman, Area Director
Occupational Safety and Health Administration
1240 East 9th Street, Room 847
Cleveland, Ohio 44199

Dear Mr. Bowman:

Re: CFR Paragraph 1910.93q - Vinyl Chloride
Dated 10/4/74

As we have studied the new vinyl chloride standard several questions as to the intent of the regulation have come up. There are two of these on which I would like to ask your advice.

1. Section (q)(4)(i thru v) relates the type of respirators required for certain concentrations of vinyl chloride. We cannot determine whether the concentrations referred to are ceiling values or values "averaged" over any period not exceeding fifteen minutes. It would be convenient for us to assume that the intent is for values averaged over a fifteen minute period but we are not certain that this is what is intended.
2. Section (e)(2) required that a daily roster be made of authorized persons who enter "regulated areas". We propose to use employee time records, which keep an accurate accounting of job assignment and hours worked, for those people assigned each day to a regulated area. For those who intermittently visit a regulated area a sign-in roster will be maintained. We would hope that it is not necessary to maintain the paperwork represented by a daily roster when the majority of the names on the roster will be repeated day after day. Our long range plan is to combine the VCM monitoring results with the employees work history and maintain a computerized record of each employees weekly and annual exposure as interpreted by the computer. Thus we would expect to comply with what we assume the intent of record keeping to be. Is such a procedure satisfactory?

Any guidance which you can provide us regarding the above paragraphs would be very much appreciated as we try to prepare to comply with this regulation.

Sincerely,
B. R. Leach
B. R. Leach
Factory Manager
Uniroyal Chemical
Division of Uniroyal, Inc.

BRL:nak

URL 02622

U. S. DEPARTMENT OF LABOR
OCCUPATIONAL SAFETY AND HEALTH ADMINISTRATION
CLEVELAND AREA OFFICE - REGION V
1240 EAST 9TH STREET, ROOM 847
CLEVELAND, OHIO 44199

October 29, 1974

RECEIVED BY ERL

OCT 30 '74



Mr. B. R. Leach
Factory Manager
Uniroyal Chemical
Division of Uniroyal, Inc.
Painesville, Ohio 44077

ROUTE		
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Dear Mr. Leach:

I received your letter of October 24 pertaining to a request for an interpretation of Section 1910.93q on vinyl chloride of the standards promulgated under the provisions of the Williams-Steiger Occupational Safety and Health Act of 1970."

Since your request is of a technical nature, I have referred your letter to our Technical Support Staff, Regional Office, Chicago, Illinois, for an official interpretation. They will reply directly to you.

Sincerely yours,

Kenneth Bowman

KENNETH BOWMAN
Area Director
Occupational Safety and
Health Administration

KB/jsb

URL 02623