



100-100-100-100
REF: OSHA-EO 10/10/10

Interoffice Communication

To Sid Pitts
From Tom Grumbles
Date June 21, 1984
Subject OSHA EO Standards

Enclosed is an advance copy of the EO standard (attachment 1). This is a copy of the text that went to the CFR printing office and last minute changes are blacked out. The standard is expected to be published on June 22, with effective dates 60 days afterwards. At that time we will have 180 days for compliance.

Basically it is a 1.0 ppm standard with no STEL. However the original "last" draft had a 10 ppm STEL listed. This was changed, literally at the last minute by the OMB (attachment 2). OSHA is going to leave the record open on the STEL issue as described in attachment 3. There is little doubt in most peoples' minds that we will ultimately have a STEL in the 5-10 ppm range.

Based on current plant programs and the requirements of the standard, the following steps will have to be taken for compliance.

1. Review EO monitoring data from the last twelve months to assure compliance with the standard. If we continue our current routine monitoring practices no additional monitoring should be necessary. There is a specific requirement to assure employee notification in writing of all monitoring results. This can be done with bulletin board posting. Based on our review of the data, we should determine if any EO regulated areas are required.
2. The standard lists specific operations where respiratory protection is allowed for exposure control. They include tank car loading and unloading, and product sampling and vessel cleaning. Our routine respirator use should be reviewed to determine if engineering controls will be necessary in any other operations.
3. Emergency plans must specifically mention EO areas and steps to be taken. We may want to write a separate plan for EO areas.
4. By copy of this letter I am asking Dr. Drumwright to review the medical requirements to see if our current panel meets these requirements.

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A new requirement is here regarding the allowance for pregnancy and fertility testing if deemed appropriate. This is apparently a compromise on the genetic testing issue. Administratively a written opinion from the physician specifically addressing EO effects is required. We will need another piece of paper added to our current medical testing results notification for EO exposed workers.

5. A training program specific to EO will have to be developed.

6. We will have to review the potential exposure situation resulting from EO residuals in Ethoxylates, to assure handling of these products falls under the exempted operations paragraph (p.332), and document this determination.

The above is a brief description of steps that I see as necessary for compliance. Please review the standard and we'll discuss the above steps. I'll have a CFR copy to you by mid next week.

The legal opinion at EOIC is that we will not have stay of this standard before the effective date.


Thomas G. Grumbles

ras

cc Jim DeBernardi
Ralph Ferrell
M. Malloy
Dr. Drumwright

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