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CF: CSHA

October 20, 1986

VISTA

Docket Officer
Occupational Safety and Health Administration
Docket No. H-150, Room N-3637
U. S. Department of Labor
200 Constitution Avenue, N.W.
Washington, DC 20210

Dear Sirs:

Vista Chemical Company respectfully submits the following information in response to the request for comments on OSHA's proposed Occupational Exposures to Toxic Substances in Laboratories Standard. Vista Chemical Company is a major producer of polyvinyl chloride, detergent intermediates, and various industrial chemicals. As such, Vista has quality control and research laboratories where the proposed standard would apply.

Performance Approach

1. In general, Vista supports the performance approach to a health standard for laboratory practices and employees.
2. Vista agrees with the approach of requiring hoods function properly rather than specifying face velocities or construction details. Vista utilizes face velocity checks and routine maintenance checks of hood mechanical system to assure the proper functioning of laboratory hoods.
3. Vista feels the proposed standard should include both health and safety provisions for laboratories. A vertical standard including both would eliminate the need to refer to multiple standards to assure compliance in the laboratories affected.
4. To be consistent with the performance approach and other OSHA standards, Vista proposes the "Chemical Hygiene Officer" requirement be changed to state that "a responsible person be specifically designated by the employer to develop and administer the Chemical Hygiene Plan".
5. The establishment of regulated areas for work with carcinogens in laboratories and laboratory areas is impractical in many cases and inconsistent with the criteria used for the establishment of regulated areas in other standards. Laboratory fume hoods are seldom dedicated to one type of chemical use in manufacturing quality control labs. The

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procedures used, not the areas worked in, are the methods used to control exposures. Use of carcinogenic materials requiring the establishment of a regulated area is seldom continuous.

6. In general, Vista objects to the medical surveillance provisions. No similar requirements exist for the majority of chemicals for which OSHA has established PEL's. Medical surveillance for emergency exposures as defined in substance specific standards may be justifiable. However, to require medical consultation for any exposure potentially exceeding the PEL is inconsistent with OSHA standards for workplace exposures and not justifiable as good medical practice.
7. Consistent with the performance approach, the standard should allow reference to existing facility policy and procedures for elements required to be included in the chemical hygiene plan. A laboratory not associated with a manufacturing facility may require a specific written program. However, many instances the establishment of a specific laboratory plan for a manufacturing facility quality control lab will be redundant in content and application with other facility programs and add little to health protection of the employees.
8. The reference to ACGIH TLV's should be changed to read, "a recognized recommended exposure standard such as a TLV, NIOSH guideline, or AIHA WEEL."

Sincerely,


Thomas G. Grumbles, C.I.H.
Environmental Quality Manager

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