

American Cyanamid Company
One Cyanamid Plaza
Wayne, NJ 07470

April 25, 1986

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Mr. James J. Concannon, Director
Office of Variance Determination
Occupational Safety and Health Administration
U. S. Department of Labor
Third Street and Constitution Avenue, N.W.
Room N-3656
Washington, DC 20210

Dear Mr. Concannon:

Due to the severe economic impact on its Chicago manufacturing facility, American Cyanamid Company hereby reapplies for an interim order and variance from the OSHA blood lead trigger level of 50 ug/100g for medical removal protection (MRP). Such interim order and variance, upon your approval, would require us to remove an employee only when that employee's six month average blood level exceeds 55 ug/100g provided not more than 10% (3 out of total plant population of 26) of the work force has blood lead levels greater than 50 ug/100g. If more than 10% of the work force is found to have blood lead level greater than 50 ug/100, the trigger level for MRP for individual employees would revert from 55 ug/100g to 50 ug/100g.

Cyanamid has undertaken all feasible measures to comply with the OSHA Lead Standard at its Chicago Plant. Since 1971, Cyanamid has spent \$654,700 in capital costs and incurred approximately \$250,000 per year in operating costs for its engineering, work practice and personal protection controls to reduce actual employee exposure to lead at the plant. Likewise, Cyanamid has adopted and maintained a sophisticated respiratory protection program whereby most employees use MSA Duo-Flo full-face respirators. Although these measures have not reduced the blood lead levels of all employees to below 50 ug/100g, they have resulted in significant overall reductions in blood levels. For the initial eighteen months that we owned the plant (July, 1971 - December, 1972) 93% of the employees had blood-lead levels at, or above, 50 ug/100g, and 42% of the employees had blood lead levels of 80 ug/100g or above.

The Cyanamid Chicago plant was granted a variance from March 15, 1985 to September 1, 1985 which was extended by an interim order to October 30, 1985. However, in view of the declining average blood lead level, we withdrew the continuance of such variance on November 7, 1985. By early 1986, three of our employees' six month blood lead had slightly exceeded 50 ug/100g (50.6, 50.5 and 50.6 respectively). When this was observed, all three employees were immediately removed from their jobs. Based on

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our records, these three employees' average blood lead has always been on the border line of 50 ug/100g, although the rest of the Chicago plant's employees' levels are all below 46 ug/100g. Currently, the six month blood lead levels for affected employees are 48.6, 49.3 and 50.6 ug/100g respectively.

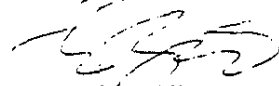
After a careful study, we also discovered that:

- 1) Employees' blood lead tends to peak during winter.
- 2) Based on our retirees' records, it would take six to eight years to reduce blood lead from 50 to 40 ug/100g .
- 3) The cost for the Chicago plant to put three employees on MRP is approximately \$100. As a small plant there is no productive or meaningful position available for these effected employees outside the production area. Therefore, it is difficult for this plant to operate under this condition.
- 4) Leaded pipe used throughout the entire Chicago Metropolitan area could contribute to the blood lead levels of the affected employees.

For the foregoing reasons, American Cyanamid requests that OSHA grant an interim order and variance for the Chicago plant from the MRP removal trigger of 50 ug/100g and the return level of 40 ug/100g. Instead, we request a 55 ug/100g MRP trigger level so long as not more than 10% of the workforce exhibit blood lead levels greater than 50 ug/100g.

Please review the attached application at your earliest convenience. If you need any further clarification please feel free to contact me at (201) 831-2708. Your prompt reply would be highly appreciated.

Sincerely yours,


N. D. Yin, CIH
Manager, Industrial Hygiene Program

NDY:mla
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Attachment

bcc J. Caporossi NA
E. Malone NA
J. Terenzi NA
J. Lindsay NA
H. Gaffney ✓ MG
(w/o attach.)

bcc D. L. Morgan
Cleary, Gottlieb, Steen & Hamilton
1752 N Street, NW
Washington, DC 20036
(w/o attach.)

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