



Air Products and Chemicals
INC.

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H. L. WATSON

Date April 23, 1975

INTEROFFICE
MEMORANDUM

Subject OSHA-VCM Standard - Inter-
pretations

To Distribution

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From J. T. Sebastianelli

(Location, Organization, or Department)

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Attached is a self-explanatory letter from the General Counsel for the Society of the Plastics Industry, which some of you may have received from other sources. I believe the attachment to the letter, which is taken from an article appearing in the April 1975 issue of Job Safety and Health Magazine, is very helpful to us in confirming some of the interpretations of the Standard that we have used in establishing our own program for compliance with the VCM Standard.

You will note that on the copy of the Job Safety and Health Magazine article I have written certain notations regarding the effect of the interpretations on our own compliance program. In most cases, the interpretations provided in the article are identical to those we have used in our program.

I would ask John Barr to write to the OSHA Regional Program office to obtain a final copy of the Program Directive. Howard Watson should take note that OSHA's interpretation is that any employee who is exposed to VCM in excess of 5 ppm, even for one day, must undergo the initial medical program.

Joseph T. Sebastianelli
J. T. Sebastianelli

JTS:lj

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