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01Nov76

PLAINTIFF'S
EXHIBIT
AL-1092

RE: OSHA COKE OVEN EMISSIONS STANDARD

Attached is a copy of the captioned that I promised to send you. As I see it, this standard won't have too much direct effect on the existing CTPV standard (1910.1000, Table Z-1). OSHA has made it plain that the coke oven emission and CTPV standards are separate and distinct.

Features of the coke oven standard of special interest to us as they might ultimately affect the CTPV are the following:

1. Coke oven emissions means the benzene soluble fraction of total particulate matter.
2. Permissible exposure limit of 0.15 mg/M^3 (pretty close to CTPV's 0.2 mg/M^3).
3. Limit is an 8 hr. TWA. Employer must monitor employee's exposure for at least 7 continuous hours.
4. Accuracy of analytical method must be not less than $\pm 35\%$.
5. Employer is to keep employee exposures below 0.15 mg/M^3 and install specified engineering controls.
6. Acceptable respirator is a particulate filter for dust, mist and fume.

There are some points in the explanatory notes that also may be of interest.

P. 46752: Scope and application. Explains that this standard applies only to coke oven emissions.

P. 46755,6: OSHA contends that although the 0.15 mg/M^3 limit is not absolutely safe (they feel that the safe number is zero), it is adequate, to the extent feasible, to protect the coke oven workers. Setting this limit doesn't preclude them from lowering it in the future.

P. 46759: OSHA believes accuracy of analytical method should be $\pm 35\%$. (Wonder if any benzene soluble method can achieve this?)

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P. 46773: 3rd column, top: Particulate is the basic material against which workers must be protected.

P. 46774: Any high efficiency particulate filter respirator is suitable protection until 1979, at which time OSHA expects that NIOSH will have approved types specifically intended for coke oven emissions.

Hope you find the package to be interesting reading.

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