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RF (if not one
in OSHA file)

TO: Keith Fogg-LCCP

FROM: T. G. Grumbles

DATE: August 31, 1990

Interoffice
Communication

SUBJ: OSHA PROPOSED RULE: OCCUPATIONAL EXPOSURE TO 1-3,
BUTADIENE

VISTA

On August 10, OSHA proposed to lower the PEL for 1-3 Butadiene from 1,000 ppm to 2.0 ppm, with a 10 ppm STEL for 15 minutes. To implement this change OSHA is also proposing a full standard for the chemical. The standard includes all ancillary requirements found in other full standards, such as benzene and ethylene oxide. The proposal is attached. I've spared you the 50 pages of risk assessment verbiage, and attached only the summary and explanation section, Pages 32787 to 32803 and the actual standard and appendices, beginning on Page 32803. Below are general comments on the standard.

The ancillary requirements, (monitoring, medical surveillance, training, etc.) are substantially the same as found in the benzene and ethylene oxide standard. Monitoring, frequencies, regulated area definition, medical surveillance, labeling, and training requirements have the same basic frequency and content requirements. Based on my review, if the standard was finalized as is, the following would need to be done:

a. Initial baseline survey of Butadiene Exposures

The standard allows any sampling meeting accuracy requirements done with twelve months of the final date to be used, but with the EXAM process changes we should do a thorough baseline survey to include STEL measurements and use outside analytical services to assure accuracy.

b. Modification of Labels

As with Benzene and EO there are specific words that must go on warning signs that take precedence over HAZCOM requirements. Workplace containers and transportation containers will require modified labeling.

c. Modification of MSDS

This will be done by Houston.

d. Training Program

A specific training program, or module for hazcom training, for butadiene will be needed.

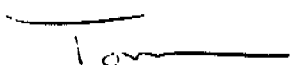
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e. Emergency Plans

Section (b) of the standard has specific requirements for emergency plans regarding butadiene. Modifications to existing emergency plans may be needed to assure compliance with these requirements.

The above is based on my understanding of previously measured exposure levels being low. If exposures exceed the PEL's then engineering controls and development of a written compliance plan will be required.

I plan to comment on several issues in the proposal as described in the attachment. Please let me know if you have comments on these issues, or have additional comments to make. Comments are due by October 19.


T. G. Grumbles

dlj

attachment

cc: J. Friend-LCCP
J. R. Drumwright

w/o attachment

J. A. DeBernardi, W. L. McClain, D. L. Cohen

DRAFT
BUTADIENE PROPOSAL COMMENTS

1. Regulated Areas - The definition of regulated areas in Section (b) and the requirements language in Section (e) seem somewhat inconsistent. Regulatory history indicates regulated areas are defined by occupational exposures not airborne concentrations.

To be consistent with other rules, the language should be changed as follows:

"The employer shall establish a regulated area wherever occupational exposure to airborne concentrations of butadiene may exceed the PEL or the STEL".

2. Initial Monitoring - Based on the logistics of obtaining 8-hour TWA and STEL measurements and obtaining analysis meeting the accuracy requirements, the 60 day requirement should be extended to 90 days.
3. Compliance Program - Section (f)(2) requires a compliance plan be developed if all exposures are under the PEL's. This statement is too absolute and should be changed to reflect the result of the initial monitoring determination not keyed to any single result.