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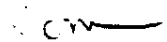
Interoffice Communication

To Michele Malloy
From Tom Grumbles
Date June 1, 1983
Subject EO STANDARD COMMENTS TO OSHA

Below are my comments on your draft comments. They are referenced by letters that appear in the margin of the comments.

- A. This should be the Ethylene Oxide Industry Council not CMA. EOIC is an ad-hoc group of the special projects division of CMA, but is identifiable to OSHA as EOIC.
- B. The implication here, as written, is that we support regulated areas. I would recommend the wording be changed to ...It is recommended that the standard read as follows: "Regulated areas should be established in areas where employees work and receive personnel exposures exceeding 1.0 ppm as an 8-hour TWA".
- C. Suggest wording change to "Direct reading instrumentation specific for EtO detection at low levels is not readily available for this type of field application".
- D. Suggest word change to, "The recordkeeping requirements for the EtO Standard should simply state that records required under this standard shall be kept in accordance with 29 CFR Part 1910.20, as revised July 13, 1982."
- E. The preamble states that this provision is part of Section 8(c) of the Act. If this is the case should we make this comment? (Pg. 17308, no.13)
- F. I don't feel that this statement is strong enough against genetic testing or screening for chromosome damage. I feel we should also quote the recent report from the Office of Technology Assessment, "The Role of Genetic Testing in the Prevention of Occupational Disease. In summary, none of the tests evaluated by OTA met established scientific criteria for routine use in a workplace setting, and it emphasised that technology in this area is still "developing".

Please call so we can discuss these comments.


Thomas G. Grumbles

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