



R. File

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November 5, 1981

Newell Bolton
Union Carbide Corporation
270 Park Avenue
New York, New York 10017

Subject: EOIC Industrial Hygiene Questionnaire

Dear Newell:

Following are comments and recommendations on the Industrial Hygiene Questionnaire content.

As indicated in the minutes of the IH task force the items 5.1 thru 5.5 were "items" to be included in the questionnaire. I trust it is correct to assume that the actual questions will be formulated based on our responses to you.

Section 5.1, Standards, combines the issues of exposure standards used in individual companies and exposure level measured. I feel the exposure levels measured and currently known by industry are important enough to warrant a separate and more detailed section of the questionnaire. This has always been a large part of any OSHA ANPRM.

Section 5.2 on Personal Monitoring should be expanded to include questions concerning the limitations and problems with the sampling techniques used. This includes such items as lower detection limits, sampling time and flow rate limitations, and storage time or transportation problems.

Section 5.4 on Respiratory Protection should be expanded to distinguish between routine and non-routine use of respiratory protection for exposure control.

In general if the questionnaire is to be complete for gaining information to respond to an ANPRM it should include questions on employee education programs and practices, and Medical surveillance. The Medical Task force has indicated that they would probably have questions to be included and should be contacted for their input.

These comments are fairly general in nature and I will be happy to lend specifics when needed.

Sincerely,

Thomas G. Grumbles, Director
Industrial Hygiene

sef

cc: Wes Jordan
Becton Dickinson

CCR 000001742