Monsanto

(FROM) (NAME & LOCATION) R. L. Harness - W.G.K. Plant

DATE : December 22, 1975

SUBJECT : COMMENTS ON PROPOSED OSHA STANDARDS FOR AROCLOR 1254 AND CHLOROBENZENE

REFERENCE :

TO : W. B. Papageorge

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cc: R. W. Flint
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Paul Heisler passed along copies of the proposed OSHA Standards for Aroclor 1254 and Chlorobenzene for my comments.

1) The "Action level" concept in both documents is not consistent with earlier OSHA/NIOSH proposals. Quite a few more specific requirements are mandatory at exposure levels below the action level. For example, the NIOSH document for Benzene (HEW 74-137) requires that if exposure is below the action level, only the requirements for skin and eye protection, smoking in benzene areas, general housekeeping, and waste disposal are mandatory. The requirements for environmental monitoring, medical surveillance, labeling and posting informing employees of hazards, and other work practice standards are optional. The documents for Aroclor 1254 and Chlorobenzene are much more inclusive at exposures below the Action level.

2) In section (d)(3) of both documents, they require measurements to demonstrate the effectiveness of mechanical ventilation systems, listing "for example, air velocity, static pressure or air volume." None of these measurements are essential to assessing the true measure of a ventilation system's worth. If air monitoring indicates that concentrations are below the permissible levels, additional testing serves no purpose.

3) In section (f) of both documents, the use of "impervious" clothing is required. By "impervious" I assume that they mean something similar to rain suits. We don't want to require people to wear rain suits at all times in these departments. It would also be most difficult to supervise such a regulation on an around-the-clock basis.

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4) Section (l)(l) - gives the employee or his "representative" the right to observe exposure measurements. Does this mean we must open the plant to anyone the employee designates?

5) Section (h)(2) of the Aroclor 1254 document. Does this prohibit eating in the department control room? If so, this will be a problem to us. As you know, we have emphasized eating in the operating departments in many of our past workforce reduction programs.

Of the above comments, No. 1 is the most significant. The trend seems to be to require compliance with more and more work practice standards in situations where concentrations are below the Action level. This is not only costly, but administratively nearly impossible to develop a compliance program for a plant with nearly 100 OSHA regulated materials.

Please let me know if you have questions or desire additional information.

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