

Inter-Organization Correspondence

BFGoodrich

TO	See Distribution	FIELD POINT OR AKRON DEPARTMENT & BLOC. NO.	DATE YOUR LETTER
FROM	L. B. Crider	Avon Lake Technical Center	October 8, 197
SUBJECT	Analytical and Monitoring Procedures Required for Compliance with the OSHA Permanent Standard for VCM		

Since the publication of the OSHA Permanent Standard for VCM on Oct. 4, I have been attempting to obtain some clarification as to the specific analytical procedures that will be acceptable to OSHA for compliance with this new regulation. At the present time I can only say that the total picture relating to both the continuous monitoring requirements and personal monitoring procedures are not sufficiently defined to allow an assessment of what these total requirements may be. There are several key bits of information which relate to the cause for this confused situation and of which you should be aware;

- (1) The requirements for monitoring as outlined in 1910.93 g (d) (4) on p. 35869, Vol. 39, No. 194 of the Federal Register (10/4/74) states that the required procedures are available in the "NIOSH Manual of Analytical Methods". This manual does not contain a procedure for VCM. Attached you will find a copy of the Table of Contents from this manual. It is conceivable that the procedure identified as a method for the analysis of "Organic Solvents in Air" (#127) may be the procedure referenced in the Federal Register; however, my contacts at the NIOSH laboratory in Cincinnati do not confirm this.
- (2) The NIOSH laboratory in Cincinnati has a procedure for "Vinyl Chloride in Air" that has not been issued. It is currently classified as an "Operational Procedure" but the precision of the method is unknown. A copy of this procedure is also attached.
- (3) Our contact at SPI on analytical procedures, Dr. Dan Dixler (Keller & Heckman, Washington), also was not able to offer any clarification as to an interpretation of either the continuous monitoring or personal monitoring procedures. To the best of his knowledge no one in the PVC industry has been able to identify the procedures that will be required.
- (4) A letter has been written to Mr. John Stender, Assistant Secretary of Labor, requesting identification of appropriate or acceptable monitoring and analytical procedures.
- (5) A purchase order has been sent to the U. S. Government Printing Office in Washington for 100 copies of the NIOSH manual referenced in the Federal Register. There is a scant possibility that this order will be filled since the only few existing copies are at the NIOSH laboratory in Cincinnati. I was able to obtain only a single copy until additional printings are made.

NGC 15433

Page Two
October 8, 1974

Although the specific details of the analytical methods have not been identified our current best judgment is that the personal monitoring procedure will be a charcoal tube sample collection and a gas chromatographic analysis similar to the enclosed NIOSH #178. Personal monitoring will be required for those employees working in areas where VCM can exceed the "Action Level" (0.5 ppm averaged over an 8 hour day). Personal monitoring must be repeated monthly for employees exposed in excess of the "Permissible Limit" (1.0 ppm for 8 hours or 5.0 ppm for 15 minutes). Continuous monitoring is required in areas where VCM levels may exceed the allowable concentration for "the devices in use". Our current inquiry to OSHA has included a request for clarification of this statement.

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*Enclosures: (1) Index to NIOSH Manual
(2) NIOSH Procedure #127
(3) NIOSH Procedure #178

NGC 15434