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Medical Surveillance of VCI workers

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In rereading O.S.H.A. 1910.93 q (k) (7) concerning "alternative medical examinations", it seems clear that it refers only to 1910.93 q (k) (1), outlining the scope (components) of the required medical examinations. The definition of the employees to be offered the examinations and the specified frequency of the examinations, covered by main body of 1910.93 q (k) and by 1910.93 q (k) (2) respectively, evidently are not subject to alteration by the examining physician under the terms of the standard. ~~Thus~~ I presume that a variance would be difficult to obtain. Without a variance, I believe that the Company must offer the examinations to each employee having as much as a single day's exposure to a TWA of 0.5 ppm VCI - ridiculous though this appears to be - if it is not to be in violation of the law.

TRR:ba

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