



AOMA Report

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RULEMAKING RECORD ON LEAD REOPENED FOR RECEIPT OF LIMITED INFORMATION

A limited reopening of the rulemaking record covering occupational exposure to inorganic lead has been announced by the Occupational Safety and Health Administration. The action came as a result of a court ruling concerning feasibility in certain industries.

In a lengthy opinion issued August 15, the U.S. Circuit Court of Appeals for the District of Columbia upheld the validity of OSHA's lead standard in most respects, but found that OSHA failed to present substantial evidence or adequate reasons to support the feasibility of the standard with respect to certain industries,* and remanded the standard to the agency for reassessment. Accordingly OSHA has reopened the lead record for the limited and express purpose of soliciting and receiving additional information pertaining to the technological and economic feasibility (including the time necessary for meeting the 50 $\mu\text{g}/\text{m}^3$ permissible exposure limit solely by engineering controls and work practices) for those industries for which the Court ruled OSHA had not adequately determined feasibility.

The Court upheld the validity of the entire standard for the major lead industries: primary smelting; secondary smelting; printing; can manufacturing; battery manufacturing; paint and coatings manufacturing; ink manufacturing; wallpaper manufacturing; electronics manufacturing; and gray-iron foundries. OSHA is not requesting information pertaining to these industries. Some of the issues on which OSHA is soliciting data with regard to those industries excluded by the Court, include identification of industries in which workers are exposed to lead and the size, age, location, and number of plants in each; the number of workers exposed to lead and the jobs in which exposure occurs; the chemical and physical characteristics of lead to which workers are exposed; the airborne concentrations, duration, and frequency of exposures; the number of workers exposed to various concentrations of lead and their blood lead levels.

Additionally, OSHA is interested in knowing in which operations or processes a 50 $\mu\text{g}/\text{m}^3$ exposure level has been achieved; if that exposure limit has not been achieved, what engineering and work practice controls are available and what time would be necessary for their implementation, and whether there are any unique conditions in an industry that would preclude the use of these controls, in what operations should personal protective equipment be required, are there other OSHA standards or other federal or state regulatory activities that affect workers' exposure to lead, are there any technological changes to improve productivity in the industry which have also reduced lead exposures; and what is the availability, price, and serviceability of any substitutes.

Written comments will be received until October 27. An informal public hearing is scheduled to be

* nonferrous foundries; pigment manufacturing; shipbuilding; auto manufacturing; solder manufacturing; wire patenting; pottery; brick manufacturing; agricultural pesticides manufacturing; leather manufacturing; pipe galvanizing; gasoline additives manufacturing; linoleum-rubber-plastics manufacturing; paint spraying; ammunition manufacturing; smelting and refining of zinc, silver, gold, platinum, copper and aluminum; machining; lead burning; glass manufacturing; textile manufacturing; book binding; steel alloy manufacturing;terne metal manufacturing; glass polishing and spinning; cutlery manufacture; diamond processing; plumbing; jewelry manufacturing; pearl processing; casting; cable coating; electroplating; explosives manufacturing; lamp manufacture; sheet metal manufacture; tin rolling; telecommunications; and independent collecting and processing of scrap lead (excluding collecting and processing that is part of a secondary smelting operation).

held in Washington on November 5, 6, and 7. Comments should be sent to: Docket Officer, Docket H-004E, Room S6212, U.S. Department of Labor, Washington, DC 20210. Notices of intention to appear and written testimony should be sent to Clarence Page, OSHA, Division of Consumer Affairs, Room N3635, U.S. Department of Labor, Washington, DC 20210. The public hearing will be held in the auditorium of the Frances Perkins Labor Department Building.

OSHA/NIOSH ISSUE ALERT ON 2-NITROPROPANE; CALLED POTENTIAL HUMAN CARCINOGEN

Health hazards from occupational exposure to 2-nitropropane, which is termed a potential human carcinogen, is the subject of a 'health hazard alert' issued jointly by the Occupational Safety and Health Administration and the National Institute for Occupational Safety and Health on September 26.

The alert cites results of a recently completed study which shows liver cancers and other adverse effects in rats exposed seven hours a day, five days a week at 207 ppm over a six month period. Also cited are preliminary results of another study showing metastatic liver carcinomas in nine of ten rats exposed at 200 ppm for six months. It is noted, however, that a group of rats exposed at 25 ppm for 22 months showed no significant changes.

OSHA has announced that it will continue to enforce its current standard of 25 ppm averaged over an eight-hour workday, but recommends that occupational exposure to 2-nitropropane be reduced to the lowest feasible level since the 25 ppm value was set before the cancer-causing potential of the chemical was known. NIOSH estimates that 185,000 workers may be exposed to 2-nitropropane, which is found in coatings such as vinyl, epoxy paints, nitrocellulose and chlorinated rubber and in printing inks and adhesives.

Listed in the alert are recommended practices for employers, employees and physicians. Physicians are urged to: (a) obtain a careful occupational and exposure history; (b) inquire about complaints, including nausea, vomiting, diarrhea, dizziness, anorexia, and headache; (c) perform a physical examination with emphasis on the cardiovascular, renal, and hepatic systems; (d) order laboratory studies of blood particularly for liver and kidney function and a urinalysis with microscopic examination; and (e) advise the employee of results of the medical examination and laboratory analyses.

Single copies of the alert are available from the OSHA Office of Information and Consumer Affairs, Room N3637, Frances Perkins Building, Third Street and Constitution Ave., N.W., Washington, DC 20210; telephone 202/523-8151.

OSHA EXTENDS SEVERAL DEADLINES

Candidate List of Possible Occupational Carcinogens: The deadline for comment on the Occupational Safety and Health Administration's list of 107 workplace chemicals which may be considered candidates for further scientific review and possible regulation as potential occupational carcinogens has been extended to November 10. (See AOMA Report, September, 1980, page 1.) Comments should be sent to the Docket Office, Room S6212, Department of Labor, 200 Constitution Ave., N.W., Washington, DC 20210; telephone 202/523-7894.

Cotton Dust Standard: OSHA has issued a temporary administrative stay of certain provisions of the cotton dust standard, which became effective March 27, 1980. Under the timetable for implementation of the requirements of the standard, all provisions for respirator usage were to become effective on September 29, 1980, however, in view of fairly widespread misunderstanding throughout the textile industry about how an effective respirator program should be implemented and monitored, OSHA has decided that it would be counterproductive to require employers to implement those portions of the standard requiring