

Firestone

INTEROFFICE

DATE OCTOBER 21, 1974

TO MR. T. C. WALKER

FROM R. S. BROOKMAN

REFERRING TO LETTER OF

SUBJECT

ORC MEETING
WASHINGTON, D.C. - OCTOBER 17, 1974

I attended subject meeting in Washington, D.C. on October 17, 1974. The intended purpose was to allow industry representatives to question OSHA officials in regard to interpretation of the new permanent standard.

Representing OSHA were:

Mr. L. Cox - Stender's Industry Liaison Man
Mr. F. Kuckenbecker - Office of the Solicitor
Mr. Grover Wren - OSHA Office of Standards
Mr. R. McClure - OSHA Office of Regional Programs

Industry was represented by the following companies:

Belden Corp.	Dayco Corp.
Olin Corp.	DuPont
American Can Co.	Armstrong Cork
Union Carbide	B. F. Goodrich
Diamond Shamrock	Goodyear
Western Electric	Tenneco
Allied Chemical	

After participating in 2½ hours of questioning of these OSHA people, one can only conclude that they really do not recognize the huge number of problems associated with the permanent standard they have created. Regardless of the acceptable VCM levels, which we were told was not a subject for debate at this meeting, the ambiguity in the language of the standard and its unstated implications leave industry at the mercy of the local compliance officer.

The OSHA people present acknowledged these facts and offered the following consultation:

- A. They will publish some corrections shortly (which ones were not stated).
- B. They are now writing program directives which give guidelines to compliance officers. These documents will be made available to the general public.

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- C. They claim they will be promptly responsive to questions on interpretation in writing directed to:

Mr. Barry White
Associate Sec. For Regional Programs
OSHA
Department of Labor
Washington, D.C. 20210

Listed below is a sampling of questions asked and the OSHA responses:

1. What is meant by a non-regulated "Fabricated Product?"

Response: Any fabrication operation, regardless of temperature employed, is controlled by the standard if it results in the release of VCM above the "action" level.

2. Do containers for fabricated scrap designed to be reworked (such as calender tailings) have to be labelled as a "Cancer Suspect Agent?"

Response: Don't know, will investigate.

3. Is continuous monitoring, as required by the standard, the same as continuous, sequential monitoring?

Response: Don't know, will investigate.

4. Are other manufacturing facilities and offices within the same industrial complex as the the PVC plant that may on occasion (due, for example, to weather inversions) go above the action level of 0.5 ppm subject to the provisions of the standard?

Response: When you get your levels in the PVC plant down to 1 TWA and 5 ceiling, this should not be a problem. In the interim, we don't know, will investigate.

5. Are outside contractors, coke machine service men, etc. who enter a regulated area subject to the provisions of the standard?

Response: Don't know, will investigate.

6. Can clockcards be used for the purpose of the roster requirement?

Response: Yes.

8. Do the training provisions of the standard apply only to people working in a regulated area?

Response: No, they apply to everyone within an industrial complex who may be potentially exposed to levels above the action level. (To me this means all 3500 people in Pottstown are affected.)

9. When will NIOSH approve canister?

Response: Hopefully, before November 1, 1974.

10. How will OSHA respond when they discover that industry cannot possibly get sufficient masks and canisters by January 1, 1975?

Response: Use air supplied respirators (they are available) until you can get masks and canisters.

11. How do you explain the incongruity of the table related to types of respiratory protection--particularly with regard to the allowance of half face pieces at high VCM levels and full face pieces at lower levels?

Response: It's a difficult job to describe respiratory equipment. The table is incomplete and we (OSHA) will sometime in the future correct it.

12. How do you dispose of VCM saturated canisters?

Response: Don't know.

13. Must empty bulk trucks and railcars that contained PVC be labelled as containing a "Cancer Suspect Agent?"

Response: Yes.



R. S. BROOKMAN

RSB:djs

cc: Mr. C. J. Kleinert (2)
Mr. R. A. Park
Mr. J. J. Cassidy
Mr. W. B. Connolly, Jr.
Mr. G. D. Lloyd

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