

American Cyanamid Company
One Cyanamid Plaza
Wayne, NJ 07470

June 19, 1986

Mr. James J. Concannon, Director
Office of Variance Determination
Occupational Safety and Health Administration
U.S. Department of Labor
Third Street and Constitution Ave., N.W.
Room N-3656
Washington, DC 20210

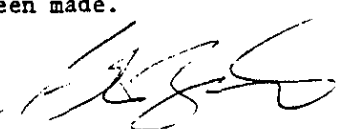
Dear Mr. Concannon:

Per our telephone conversation on June 4, 1986, I am enclosing a copy of our latest blood lead results for your review. These blood lead results are for three employees currently under Medical Removal Protection (MRP) in the Chicago plant. Although their six-month average blood lead level is below the OSHA Limit of 50 mcg/100g, their monthly blood lead levels remain between 40 to 50 mcg/100g. OSHA requires that two consecutive blood lead tests be below 40 mcg/100g before allowing the affected employees to return to their old jobs. Based on our retirees' record, we project it would take more than five years to reduce their blood lead levels to below 40 mcg/100g.

I indicated to Mr. R. J. McCann and Mr. E. Satrun, Regional OSHA Officers, on March 2, 1986, that the five-year average earnings, net after tax, for the Chicago plant is zero. Therefore, to carry three employees under the MRP at an annual cost of k\$100, has, and will continue to have, a significant adverse impact on the financial viability of our Chicago plant.

In view of this, I urge you to provide us the interim order for the blood lead variance per our request on April 25, 1986. The interim order will allow us to return the three affected employees to their jobs before a decision on our variance request has been made.

bcc J. Caporossi
J. Lindsay
H. Gaffney


N. D. Yin, CIH
Manager, Industrial Hygiene
Program

Enclosure

CYWI 3-001025

N14497

Blood Lead Results for Chicago
Employees Currently under MRP

<u>Item</u>	<u>Name</u>	<u>Month</u>	<u>Result of the Month/6-Month Average (mcg/100g)</u>
6-Month Average First Exceed 50 mcg/100g	Boyce	January	51.3 / 50.6
	Hodge	January (2 samples per mo.)	47.5, 52.3 / 50.6
	Maye	March (2 samples per mo.)	52.3, 50.4 / 50.5
	Boyce	June	51.3 / 48.0
Latest Results	Hodge	June	41.8 / 43.3
	Maye	June	46.6 / 46.8

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CYWI 3-001026
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