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OSHA METHYLENE CHLORIDE STANDARD

Enclosed is a copy of the OSHA standard on MC. This is a copy that OSHA gave to Congress and it was obtained from Congress. This will only become "official" once it is published in the Federal Register and some changes might happen before that occurs, however my guess is that any will be minor. Because of this, please do not pass the documents too far afield.

I'm also enclosing a simple summary of the standard with some interpretive highlights based on the document we have. Since we don't have the preamble, some of this is speculative at this time.

I think it is proper to begin to talk to the plants that will be affected by this standard and begin preparation for initial monitoring, etc. Note that there is no written program required by this standard.

Please let me know if there are any questions and there is anything more I can help with. If there are questions of interpretation, I'll try to pass them and the answers on to everyone.

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Enc.

P.S. I just heard that the MC standard is at the Federal Register and will be published Friday or early next week. Supposedly the language we have is identical to the standard.

# METHYLENE CHLORIDE

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These comments are based on a pre-released copy of the methylene chloride (MC) standard. Because this has not appeared in the Federal Register it is not official.

Dates:

Standard is effective 90 days after publication in the Federal Register
Initial monitoring will have to be done within 120 days after the effective date
Engineering corrections will have to be made within 1 year of the effective date
Based on Federal Register publication date

Levels:

Time-Weighted Average PEL: 25 ppm
Short Term Exposure Limit PEL: 125 ppm/15 minutes
Action Level: 12.5 ppm

Emergency:

Means an "uncontrolled" release. If an incidental release can be controlled by employees, it is not an emergency

Initial Monitoring:

Remonitor if present data is older than 12 months
Can use objective data in place of initial data

Remonitoring:

If exposures are above the AL but below the TWA, monitor each 6 months
If exposures are above either the TWA or STEL, monitor each 3 months
Monitor if exposures have increased, e.g. spill (can use direct-reading instruments)

Employee Notification:

15 days after monitoring results are reported to the plant, must inform employees by letter or by posting in workplace

Regulated Areas:

Set up if over the TWA or the STEL
Must have signs and demarcation

Method of Compliance:

Set up procedures to detect leaks of MC, contain spills and dispose of MC-contaminated wastes

Written Plan:

None is required at this time

## OSHA METHYLENE CHLORIDE STANDARD

Respiratory Protection:

Can use air-purifying respirators only when escaping from an emergency with a gas mask with organic vapor canister

Employees, including those who might use the gas mask, shall have a health care professional ascertain their ability to use respiratory protection. The health care professional shall provide its findings to the employee and employer in writing.

Up to 625 ppm, employees can use continuous flow (CF), supplied-air (SA) respirator, hood or helmet

Up to 1250 ppm, employees can use full facepiece (FF) SA respirator in negative pressure (NP) mode

Up to 5000 ppm, employees can use CF, FF, SA respirators or pressure demand (PD), SA, FF respirators or positive pressure (PP), FF SCBA

At unknown concentrations or above 5000 ppm, employees must use PP, FF SCBA or FF, PD, SA respirator with escape bottle

For fire fighting employees must use a PP, FF SCBA

For emergency escape employees can use any continuous flow or PD SCBA or a gas mask with organic vapor canister

Must replace the OV canister after every use

Respirator Fit Testing:

Qualitative or quantitative at initial fit test

Fit test annually if using negative pressure respirators

Don't have to fit test if supplied air respirator is in positive pressure mode

Personal Protective Clothing:

Must furnish clothing to protect from skin or eye irritation from MC

Dow must take care of clothing

Medical Surveillance:

If exposed above the AL for 30 or more days each year

If exposed above the TWA or STEL for more than 10 days each year

If exposed above the TWA or STEL for anytime limit and at risk from cardiac disease or other serious MC related problem and employee requests inclusion

If exposed in an emergency

At termination

Initial medical surveillance unless done within 12 months of standard

Update medical and work history annually

Physical exams, including lab work:

If employee is 45 years old or older, every year

If employee is under 45 years old, every 3 years
Content of surveillance is in the standard

OSHA METHYLENE CHLORIDE STANDARD

Written medical opinion to employee and employer within 15 days after medical and physical evaluation but not later than 30 days after the exam

Written opinion must carry certain items of information

Employer must provide certain information to health professional

Information and Training:

All employees with potential exposure must be informed and trained at initial assignment

Certain information must be given

Retraining of employees must be done as necessary

Recordkeeping:

Monitoring data must include PPE worn and names of all employees the data represents together which person was monitored

Exposure monitoring data must be kept for 30 years

Medical records must be kept for employee's employment plus 30 years

RDQ