



Interoffice Communication

To Memo for the Record

From C. E. Gremillion

Date September 30, 1974

Subject VCM Temporary Standard Employee Notification Requirement Interpretation

In telephone conversation with Mr. Steve Herron, Industrial Hygienist, New Orleans area office, OSHA on September 27, 1974 the interpretation of employer/employee notification requirements were discussed as described in 1910.93q paragraph (c) (7) of the Federal Government temporary standard released April 5, 1974. The following is the result of this conversation.

Mr. Herron stated he felt the intent of this particular section of the standard was to monitor the employee's exposure by some analytical method and then, if the employee's exposure exceeded the allowable 50 ppm vinyl chloride, the employee would be so informed by his employer. Mr. Herron did not feel it was the employer's responsibility to inform an employee of an over-exposure (greater than 50 ppm) if we had no analytical data to back it up. The example that was used was, what if an accidental leak developed during vinyl chloride loading operations, and an employee claims he smelled vinyl chloride when the leak occurred? Mr. Herron commented that since we, the employer, have no proof that the employee received this exposure, except from the employee himself, the employer cannot notify the employee of an over-exposure without proof.

I informed Mr. Herron this was the basis of our interpretation also.


C. E. Gremillion
Safety Director
VCM Plant

bw
Distribution:
VCM File
RDG-JAD-GGD-JRH-PLF-JHM

VVC 000010299