

standards. The action level concept would result in wasteful utilization of manpower with no additional health protection to the employee, the company said. According to the company, "many years of experience" with two of the ketones would indicate that an action level beneath the threshold limit value would be "unnecessary for the protection of the employees' health."

Exxon objected also to proposed requirements for the use of feasible engineering and work practices to reduce exposure, even if these measures are not sufficient to reduce exposure to the permissible level. The company recommended instead that employers be required to insure proper selection of respirators, instruct employees in their proper use, and supervise their use by employees.

Deletion of the action level concept was recommended also by William C. Janes, manager, environmental health, United States Steel Corporation, Pittsburgh, Pa. In addition, the company recommended that frequent periodic sampling not be required for ketones, because the toxic effects of these substances are due to massive, acute exposure rather than to chronic exposure.

Clayton D. Ruyle, executive secretary, industrial relations committee, Aerospace Industries Association of America, Inc., Washington, D.C., said no evidence has been presented to show that ketones are so hazardous as to warrant "the stringency and cost of the proposed standards."

According to the association, the action level concept, together with "the hierarchy of compliance methods" included in the proposed regulations, is an attempt to set an "unjustified" design standard.

Donald L. Morgan, counsel, OSHA Standards Task Force of the Synthetic Organic Chemical Manufacturers Association, Washington, D.C., said the task force "does not perceive a need for complex standards for such relatively non-toxic substances as these ketones." SOCMA objected to "the apparently uniform approach" to the standards completion project, because different substances may present different types of risks to employees, and to the derivation of language in the proposed ketone standards from standards for carcinogenic and highly toxic substances.

SOCMA recommended that the action levels for the ketones be the same as the threshold limit values for the substances. In addition, regarding proposed requirements for medical surveillance, the association said that rules which would require employers to provide medical examinations for employees who complain of symptoms of ketone exposure could "lead to mass hypochondria" and "foster problems in labor relations, absentee control, and overloading of medical services and facilities."

Bruce Hamill, counsel, National Paint and Coatings Association, Washington, D.C., said the action level for each ketone should be the same as the permissible exposure level, as "the documentation for the levels at which OSHA currently regulates the materials clearly demonstrates the non-hazardous nature of the materials when used at that level."

Additionally, NPCA called proposed methods for exposure determination and measurement "erroneous and inexact," adding that a safe workplace can be assured only by the use of trained individuals employing a properly designed and executed survey. The association said also that proposed rules for medical surveillance "will impose oppressive unwarranted burdens," and that the entire concept of industrial medicine should be investigated thoroughly by OSHA before such requirements are issued.

Edwin M. Hood, president, Shipbuilders Council of America, Washington, D.C., said the establishment of an action level at a level below the threshold limit value "is not in

keeping with the intent of the TLV concept." The TLV, the council said, should be the level for establishing controls.

The council said continuous bimonthly monitoring was not necessary for contamination levels above the action level and below the permissible exposure level. According to the council, two or three consecutive bimonthly samples with the same results should be sufficient evidence of actual concentrations.

The proposed regulations for ketones appeared in the May 8 Federal Register (Current Report, May 15, p. 1654).

Legislation

HOUSE PASSES AMENDED LEGISLATION PERTAINING TO POSTAL WORKER SAFETY

The House passed an amended bill which would place the safety and health of employees of the U.S. Postal Service under the jurisdiction of the Occupational Safety and Health Act.

The bill, HR 2559, previously was passed by the Senate with an amendment which would raise the pay of federal judges and congressmen. It was sponsored by Congressman Charles E. Wilson (D-Calif.).

The bill makes applicable to the Postal Service, Section 19 of OSHA which provides that each federal agency head be responsible for developing and carrying out an effective safety and health program for his employees (Current Report, June 26, p. 134). It is awaiting White House approval.

Variances

VINYL CHLORIDE INTERIM ORDERS DRAW NO RESPONSE FROM UNIONS, OSHA SAYS

No official response has been received by the Occupational Safety and Health Administration from unions or employees on the issuance of interim orders to three companies pending decisions on the firms' applications for variances from requirement of the vinyl chloride standard, an OSHA spokesman told OSHR.

Firestone Plastics Company (Current Report, June 5, p. 22), Keysor-Century Corporation (Current Report, June 5, p. 23), and Stauffer Chemical Company were the companies granted the interim orders.

Stauffer received separate interim orders for installations in Westport, Conn. (Current Report, April 24, p. 1554), Carson, Calif. (Current Report, May 8, p. 1636), and Dobbs Ferry, N.Y. (Current Report, June 19, p. 100).

According to the OSHA spokesman, the only union involvement in the applications for variances occurred when Firestone issued its request for a variance. In a telegram dated April 9, 1975, Peter Bommarito, president, United Rubber Workers International Union, Akron, Ohio, told OSHA that "we do not feel that Firestone has acted in good faith" in seeking a variance.

Regarding Firestone's contention that it was unable to comply by the effective date with respirator requirements in Section 1910.1017 (g) (4), the union said, "it appears that Firestone had already been given enough time to make respirators available to all employees exposed to vinyl chloride, especially employees exposed to levels above 25 ppm."

The telegram continued, "The United Rubber Workers employees respectfully contest the Firestone request for

temporary variance from the vinyl chloride standard," and added, "further documentation will be forthcoming."

However, according to the OSHA spokesman, no "further documentation" was sent by the union. The spokesman added that a meeting was held in Washington, D.C., last spring between URW representatives and representatives from the OSHA Office of Standards Development and the Office of Compliance Programming, and that communications are continuing between OSHA, Firestone, and the union.

The spokesman added that Firestone was found recently to be in compliance with the respirator standard for levels both beneath and above 25 ppm.

Noise

SUBCOMMITTEE HEARS DATA ON NUMBER OF OSHA CITATIONS FOR NOISE IN THREE YEARS

There were 10,641 noise samples taken by the Occupational Safety and Health Administration from January 1973 to March 1975 resulting in 9,018 citations for noise during the period. Alexander J. Reis, OSHA associate assistant secretary for national programs, said on July 25.

Testifying on industrial noise before the Senate Select Committee on Small Business, Reis submitted data on the noise-related violations observed during the last two and one-half years by size of establishment and type of industry inspected.

The data suggest noise citations were issued most often in establishments with from 100 to 249 employees, and most violations occurred in manufacturing industries. Reis said the Environmental Protection Agency's coordinating function is important because of the number and variety of federal programs that can affect the noise problem.

Thomas Kleppe, administrator, Small Business Administration, said many small firms will have to pay to meet either an 85 or 90 dBA noise level in the workplace. It would be much better from the standpoint of small business to offer the option of providing employees with ear plugs or other protective devices, rather than the alternative of having to replace machinery or facilities to meet the new noise level standards. "Even better would be an exemption for the smallest of the smalls," Kleppe said.

He described the SBA loan program, available for aid in compliance with OSHA, and said that, to date, SBA has made 38 loans for a total \$10.9 million. Kleppe said SBA and OSHA signed a new memorandum of understanding delineating responsibilities in providing financial assistance to small business.

Newspaper Guild

Robert M. Crocker, international secretary-treasurer, The Newspaper Guild, AFL-CIO, said a serious noise problem that is not well-known exists in wire rooms of newspapers and in bureaus of the wire services where decibel levels in the 80's and 90's and above have been recorded.

Crocker said the Wire Service Guild recommends consideration be given to basing permissible noise levels on the World Health Organization study that recommended 60 decibels as the maximum in any environment in which employees must work for prolonged periods. WHO recommended also that employees working on a daily or hourly basis in areas having a noise level of 70 decibels be given employer-paid hearing tests annually; and that an employer demonstrating the ability to upgrade health and safety standards in any of its facilities be required to apply its highest standards throughout all facilities, he said.

NIOSH

While noise-induced stress may be a factor in disease, the issue of whether excessive sound exposures can directly or indirectly lead to permanent health disorders remains controversial. John F. Finklea, director, National Institute for Occupational Safety and Health, told the subcommittee.

Loud noise can result in changes of the cardiovascular, endocrine, neurologic, and other physiologic functions to create a generalized stress reaction of the body. Finklea said. He added that the inability of past research on stress effects to eliminate other factors which could lead to the health problems supposedly caused by high level noise exposures raises questions about the conclusions.

A recently completed NIOSH study linked noise exposure to medical, attendance, and job accident problems. The contract research, which studied the medical, attendance, and accident record of 400 workers in a boiler making plant for two years prior to the establishment of a hearing conservation program and two years after, showed significant reductions of worker problems in the three areas. Comparable records from a control group showed no substantial change during the same two time periods. The research suggests that a hearing conservation program can be helpful in reducing extra-auditory problems of noise exposure as well as hearing loss, Finklea said.

Outlining NIOSH's efforts to improve technology of noise abatement, Finklea noted that the agency has prepared lists of performance data for various ear plugs and muffs and has published procedures for rating the effectiveness of the devices. In addition, NIOSH presently is working on methods for measuring the performance of ear plugs in use and the agency is attempting to "refine" noise survey methods and techniques for audiometric testing.

Finklea also said two noise control handbooks are being developed by NIOSH to provide small employers with a catalog of noise reduction materials and suppliers and to present case histories of engineering solutions as a guide for noise control.

Noise

RELIANCE ON PROTECTIVE EQUIPMENT SHOULD BE CHOICE OF OSHA, INDUSTRY SAYS

The Occupational Safety and Health Administration's rejection of personal protective equipment as a primary means of controlling worker exposure to excessive noise is unfair, unreasonable, and inflationary, according to testimony presented by various industry representatives at hearings on the proposed occupational noise rule.

The hearings, which began June 23, concluded July 30 after oral testimony from some 138 labor, medical, industry, and government representatives. The Labor Department gave no indication as to when it would issue a final noise standard. (See related articles this issue).

The B.F. Goodrich Company told OSHA that the proposed standard places "unwarranted burdens" on the employer even though it provides more adequate protection for noise-sensitive employees than the presently enforced rule.

Roger Strassburg, Goodrich director of environmental affairs, urged OSHA to take a compromise position with the final workplace noise rule and allow a balanced program of feasible engineering controls and effective hearing protection.

Strassburg told OSHA that a hearing conservation program for the 60 to 70 percent of B.F. Goodrich's