

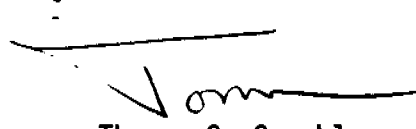
Interoffice Communication

To Distribution
From Tom Grumbles
Date September 29, 1983
Subject FIXED-POINT MONITORING DATA RECORDKEEPING

Some questions have been raised as to the applicability of OSHA monitoring data recordkeeping requirements to fixed-point data. A literal reading of the definition of monitoring data in the standard would appear to include this type data. However, based on a review of this issue by Legal, data produced from fixed-point monitors does not fall under the OSHA recordkeeping requirements. A letter from Michele Malloy concerning this is attached. It should be noted that there are short-term recordkeeping requirements for VCM fixed-point data under EPA regulations.

I would recommend the following:

1. Some type of data summary, probably monthly, should be kept to document plant conditions.
2. Data from specific days, i.e., when contractors are working in the plant, be kept to document environmental conditions in areas that work was being done.


Thomas G. Grumbles

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Attachment

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cc M. Malloy
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