



Interoffice Communication

To C. L. Whetstone, M.D. - Ponca City
From J. A. DeBernardi
Date April 22, 1975
Subject Medical Surveillance - OSHA VCM Exposure Standard

As you are aware, the permanent VCM exposure standard (1910.939 Vinyl Chloride) became law on April 1, 1975. A very significant portion of this standard relates to medical surveillance for employees exposed to VCM. A comparison of the standard requirements with your letter of March 21, 1975 related to medical surveillance, would indicate a need for a re-evaluation of the Medical Division's recommendations made in that letter. The particular medical areas of the standard to which I'm referring relate to frequency of testing and type of tests performed.

Frequency of testing, as stated in the standard, requires examinations and tests be accomplished on a yearly basis for employees with less than ten years of exposure to VCM or PVC, and twice per year for employees with more than ten years exposure. The guidelines in your letter indicate blood work and urinalysis be accomplished every six months without regard to years of service. Physical examination requirements set forth in the standard indicate that radiological examination, pulmonary function tests, and urinalysis be performed only as supplemental medical testing should required medical tests indicate abnormalities in the person tested. Your guidelines again indicate these tests be performed routinely rather than supplementarily.

I would very much appreciate your comments related to the potential for revision of the medical surveillance program outlined in your March 21, 1975 letter in the light of the recently adopted standard requirements.

J. A. DeBernardi

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