

INTERNAL LETTERHEAD

TO: (NAME AND LOCATION) As Listed *

FROM: (NAME AND LOCATION) J.M. Ramey

REFERENCE NO. JMR 75-545

DATE June 6, 1975

Subject: OSHA Work Standards

As listed

The Department of Labor has identified the next eleven proposed OSHA standards which will be published in the Federal Register within the next week. They are:

p-tertiary butyl toluene	cyclohexane
cumene	camphor
ethyl benzene	mesityl oxide
alpha-methyl styrene	5-methyl, 3-heptanone
styrene	ozone
vinyl toluene	

PLAINTIFF'S EXHIBIT

CEL-1049

I have requested copies of the standards from our Washington office just as soon as they become available. I suggest a thorough review on the following standards:

- 1) Cyclohexane - Bay City
- 2) Ozone - Bishop

I do not believe any of the other nine are of interest to us with the possible exception of mesityl oxide which is present in low concentrations in the Diacetone Alcohol unit at Bishop. If this assumption is not accurate, please let me know.

At the same time, OSHA is revising existing health standards for:

lead - reduces permissible exposure limit (PEL) by 50% to 100 micrograms/m³ of air and initiates an Action Level at 50% of PEL.

toluene - reduces PEL to 100 ppm and imposes Action Level at 50% of PEL.

asbestos - allows workers to be exposed to 0.5 fibers/cc of air. This is a drastic change in that the old standard PEL was 5 fibers per cc of air. (A fiber is defined as a particle of asbestos longer than five micrometers). Excursions are limited to five fibers in any 15-minute period as compared to 10 in the old standard.

A word of explanation. We are still under the Asbestos standard issued on 12/18/72. The new standard is proposed and will almost assuredly have a review period before it is imposed on industry. However, I think it would be in order for all plants and terminals to review the old asbestos standard and ensure that they are in compliance.

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We recently had an incident at Celriver Terminal where asbestos shorts were being used to coat the Sparkler Filter in the HCHO unit. The 5-lb bags of asbestos were not labeled in compliance with the regulation. This was noted by an OSHA inspector on another mission. On further checking, he found we had made any initial determinations on asbestos fibers in the operating area nor monitored levels. There were other shortcomings in the area of medical examination and reporting. We will probably be issued a citation for our sins.

Celriver is converting to compacted asbestos sheets for coating filter which will minimize dusting and worker exposure. However, they will still have to comply with requirements of the asbestos standard.

I would be very interested in information on where asbestos is being used and measures being taken to comply with the health standard.

JMR:cc

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