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Dupont

The frequency and lead time for written notice of intention to do repetitive renovation work on certain processes is excessive.

the OSHA standard to protect employees' health can be achieved by the use of respiratory equipment, even in those situations where wetting is not implemented and emissions may produce concentrations in excess of the OSHA exposure limit. The extent to which emissions to the outside air are reduced cannot be determined.

The Agency intends that OSHA regulated industries report renovation operations to the Administrator. Without the reporting requirements, the Agency's enforcement of the renovation standard will be relatively ineffective; therefore, the standard has not been revised.

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The proposed regulations should be modified to include definitions of "emergency and routine maintenance renovating," and to stipulate that written notice of intention to perform these operations must be filed once every year for each plant site.

The Agency has reevaluated the reporting requirements of the amendments and a discussion of the revised reporting requirements for renovation operations is presented in the response to comment number 101. The notice of intention to do renovating work must be postmarked or otherwise delivered to the Administrator as soon as possible, prior to commencing renovation. The Agency believes that the frequency and lead time reporting requirements are reasonable and will not cause untenable hardships for any renovation operation.

The Agency agrees that routine and emergency renovation operations should be distinguished and reported to the Administrator by separate reporting procedures. Therefore, the standard has been revised by adding a definition for "planned renovation" and "emergency renovation."

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