

7-12-86
OSHA-33

TO: Sid Pitts

FROM: T. G. Grumbles

DATE: March 10, 1986

Interoffice
Communication

SUBJ: PROPOSED BENZENE STANDARD COMMENTS

VISTA

We have send^t comments to OSHA on the subject standard. You had asked for clarification on some portions of the standard and commented on others. Specific to some of your questions, I spoke with CMA and others who have talked to OSHA regarding intent of those portions you questioned. Numbers below are from your letter which is attached.

1. The "personnel" reference should be taken in a context with work practices. In other words, additional monitoring is required if you have significant changes in operator duties or routines.
2. The requirement to change cartridges at the beginning of the shift is not intended to include emergency escape respirators.
3. & 4. These were addressed in our comments.
5. OSHA placed Appendix (c) in the standard to assist employers in conveying signs and symptoms information.
6. The emergency situation exposure determination is left to the employer as in the VCM standard.
7. This aspect, recordable illness, will not be specifically addressed. Opinion in industry and recording practices are split. We should resolve this issue with Dr. Drumwright.
8. No STEL was proposed. Similar to the EO standard it was removed at the last minute. There are still some preamble reference to the 5.0 ppm STEL. This issue will probably be litigated.


Thomas G. Grumbles

ajo/8

Attachment

VVV 000017244

RECEIVED

JUN 27 1986

To: T. G. Grumbles - Timberway

From: S. F. Pitts
Date: January 27, 1986

Subject: Proposed Benzene Standard

Copy: _____

File: _____

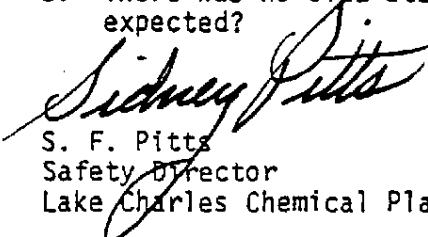
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In addition to your comments of 1-6-86 on the above proposed standard, there are some additional points that need to be resolved.

1. (e-5-i) Appears to require additional monitoring when new personnel are assigned to a unit where benzene exposure exists.
2. (g-4-i) Requires any air purifying respirator to have the air purifying element replaced at the beginning of each shift. Does this include "escape" respirators?
- 3. (g-5-i) Requires annual fit testing for any employee wearing a negative pressure respirator. Does this include "escape" respirators?
- 4. (j-2-i) Requires that all new employees assigned to a potential benzene area be given a physical exam prior to working in that area.
5. (j-3-ii) Regarding signs and symptoms of toxic exposure to benzene, these need to be spelled out so they can be recognized.
6. (j-4-i) In emergency situations, the standard requires exam if exposed. What are the levels? If it is 1 ppm, this may be a problem.
7. (j-8-i) In the event of an exam indicating further evaluation and where removal from regular job occurs, is that considered a recordable illness?
8. There was no STEL standard, or I missed it. Is a ceiling expected?


S. F. Pitts
Safety Director
Lake Charles Chemical Plant

nCS

cc: JAD

VVV 000017245