



American Cyanamid Company  
Chemicals Group  
One Cyanamid Plaza  
Wayne, NJ 07470

November 7, 1985

REGISTERED

James J. Concannon, Director  
Office of Variance Determination  
Occupational Safety and Health Administration  
U. S. Department of Labor  
Third Street and Constitution Avenue, N.W.  
Room N-3656  
Washington, DC 20000

Dear Mr. Concannon:

American Cyanamid Company, Wayne, New Jersey, requests for our Chicago manufacturing facility that our application for a continuance in relief from the final blood trigger level of 50 ug/100g for Medical Removal Protection be withdrawn.

In our letter of August 15, 1985, requesting a continuance in relief, we indicated that one employee, which was 5% of the workforce, was above 50 ug/100g. As of this date no employees are above 50 ug/100g and therefore our decision to withdraw the request for continuance in relief.

Yours truly,

B. Coopersmith, Manager  
Polymer Chemicals Department

CSH:kn

csh1106a

bcc:

|                |        |
|----------------|--------|
| J. Caporossi   | NA     |
| H. Gaffney     | MG     |
| B. Coopersmith | NA     |
| N. Yin ✓       | NA     |
| E. Malone      | NA     |
| D. Morgan      | Cleary |

CYWI 3-001091

U.S. Department of Labor

Occupational Safety and Health Administration  
Washington, D.C. 20210

Reply to the Attention of:



Mr. Mark N. Duvall  
Counsel for American Cyanamid  
Company  
Cleary, Gottlieb, Steen & Hamilton  
1752 N Street, N.W.  
Washington, D.C. 20036

Dear Mr. Duvall:

This letter is in response to your letter dated February 14, 1983 requesting a variance from Section 1910.1025(e)(1) Lead - Engineering Controls, of the Occupational Safety and Health Standards.

A request for a variance from Section 1910.1025(e)(1) is unnecessary in your situation. The modified version of the lead standard provides for the use of protective equipment (respirators) or any other protective measures when full compliance cannot be attained through engineering or administrative controls. A competent industrial hygienist or other technically qualified person must approve any equipment and/or technical measures used for the purpose of complying with the standard.

A decision must be made to determine whether the administrative controls and the respiratory system mentioned in your application are sufficient to protect the employees at risk. Furthermore, your engineering report must provide the rationale to support why it is not feasible to implement engineering controls in each particular operation.

Affected employees and their authorized employee representatives shall be informed of this clarification in the same manner they were informed of your application for a variance.

No further action will be taken on your application. If I can be of further assistance, please contact my office at (202) 523-7183.

Sincerely,

  
James J. Concannon  
Director  
Office of Variance Determination

CYWI 3-001092

N14756.01

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CYWI 3-001093

N14756.02