FY 2016 Government Unique Standards used in lieu of Voluntary Consensus Standards

Agency: Access Board (ACCESS)

Government Standard: 36 CFR Part 1194 Electronic and Information Technology

Accessibility Standards (December, 2000) [Incorporated: 2006]

Voluntary Standard Rationale

ANSI/IEEE Standard for Hearing Aid Compatibility with Wireless Devices

A provision in the Section 508 Standards requires that interference to hearing technologies be reduced to the lowest possible level that allows a user of hearing technologies to utilize a telecommunications product. Individuals who are hard of hearing use hearing aids and other assistive listening devices, but they cannot be used if products introduce noise into the listening aids because of electromagnetic interference. The ANSI/IEEE Standard for Hearing Aid Compatibility with Wireless Devices was not completed in time for reference by the agency in its final rule published in FY 2000. However, the agency will consider using the Standard in FY 20007. In the meantime, because the requirement in the agency rule is a performance standard, the agency considers compliance with the VCS to meet the agency Standard.

Agency: Consumer Product Safety Commission (CPSC)

Government Standard: 16 CFR 1500.17(a)(13), Metal-Cored Candlewicks Containing

Lead and Candles With Such Wicks [Incorporated: 2003] Voluntary Standard Rationale

Voices of Safety International (VOSI) standard on The U.S. Consumer Product Safety lead in candle wicks

Commission found that the VOSI standard on The U.S. Consumer Product Safety

Commission found that the VOSI standard is technically unsound, and thus would not result in the elimination or adequate reduction of the risk, and that substantial compliance with it is unlikely. See 68 Fed. Reg. 19145-6, paragraph H2, Voluntary Standards for further information on this

finding.

Government Standard: CPSC 16 CFR Parts 1213, 1500, and 1513 for Bunk

Beds [Incorporated: 2000]

Voluntary Standard Rationale

ASTM F1427-96 Standard Consumer Safety Specification for Bunk Beds

The CPSC rules go beyond the provisions of the ASTM voluntary standard to provide increased protection to children from the risk of death and serious injury from entrapment.

Agency: Department of Labor (DOL)

Government Standard: 29 CFR 1910 Subpart S - Electrical Standard (Incorporated:

2007) [Incorporated: 2007]

Voluntary Standard

NFPA 70 - National Electric Code

NFPA 70E - Electrical Safety Requirement for Employee Workplaces.

ANSI/IEEE C2 - National Electrical Safety Code ANSI/ASME B30.4 - Portal, Tower, and Pedestal Cranes

NFPA 33 - Spray Application Using Flammable or Combustible Materials

ANSI Z133.1 Arboricultural Operations for Pruning, Repairing, Maintaining, and Removing Trees, and Cutting Brush

Rationale

Several voluntary consensus standards were relied upon for the various provisions in the final rule, however, no single VCS is available to cover all the workplace applications that are addressed by OSHA. The Agency believes that it would be less burdensome for the regulated community to use one OSHA standard rather than purchase and use the 6 individual consensus standards it used to write the rule.

Government Standard: 29 CFR 1910.1200 – Hazard Communication Standard (Incorporated: May 2012) [Incorporated: 2012]

Voluntary Standard

ASTM D 56-05, Standard Test Method for Flash Point by Tag

Closed Cup Tester, Approved May 1, 2005, IBR approved for Appendix B to Sec. 1910.1200.

• ASTM D 86-07a, Standard Test Method for Distillation of

Petroleum Products at Atmospheric Pressure, Approved April 1, 2007, IBR approved for Appendix B to Sec. 1910.1200.

• ASTM D 93-08, Standard Test Methods for Flash Point by Pensky-Martens

Rationale

Voluntary consensus standards (VCS) were relied upon for the various provisions in the final rule. This revision was undertaken to align the U.S. with other countries utilizing the United Nations Globally Harmonized System of Classification and Labeling. It was based on various standards and guidance materials used in international negotiations under the United Nations. No single VCS is available to cover all the hazard communication issues that are addressed by OSHA in this final rule. The Agency believes that it is less burdensome for the regulated community to use the one OSHA standard rather than require the purchase and use of numerous individual consensus standards it used to write the rule.

Government Standard: 29 CFR 1915 Subpart F – General Working Conditions in Shipyard Employment (Incorporated: 2011) [Incorporated: 2011] Voluntary Standard Rationale

- ANSI/IESNA RP-7-01, Recommended Practice Several voluntary consensus standards (VCS) for Lighting Industrial Facilities
- ANSI/ISEA Z308.1–2009, Minimum Requirements for Workplace First Aid Kits and **Supplies**
- ANSI Z358.1-2009, Emergency Eyewash and **Shower Equipment**
- ANSI Z4.1–1995 and Z4.3–1995, Sanitation
- ANSI/ASME B56.1–1992, Recognition of the hazard of powered industrial truck tipover and the individual consensus standards it used to need for the use of an operator re

were relied upon for the various provisions in the final rule, however, no single VCS is available to cover all the workplace hazards that are addressed by OSHA in this final rule. The Agency believes that it is less burdensome for the regulated community to use the one OSHA standard rather than require the purchase and use of numerous write the rule.

Government Standard: 29 CFR 1926 Subpart CC Cranes and Derricks in Construction (Incorporated: 2010) [Incorporated: 2010]

Voluntary Standard

ASME B30.2-2005; ASME B30.5-2004; ASME B30.7-2001; ASME B30.14-2004; AWS D1.1/D1.1M:2002 ANSI/AWS D14.3-94; BS EN 13000:2004; BS EN 14439:2006; ISO 11660-1:2008(E); ISO 11660-2:1994(E); ISO 11660-3:2008(E); PCSA Std. No.2; SAE J185; SAE J987; SAE J1063; ANSI B30.5-1968

Rationale

Sixteen voluntary consensus standards (VCS) were relied upon for the various provisions in the final rule, however, no single VCS is available to cover all varieties of cranes and derricks and their applications.

Government Standard: 29 CFR 1926.1002 Roll-Over Protective Structures (Incorporated:

2006) [Incorporated: 2006] **Voluntary Standard**

SAE J1194-1999

Rationale

Many consensus standards were relied upon for various provisions in the final rule. The primary VCS that applies directly to ROPS is SAE J1194-1999 which incorporates by reference several other VCSs. If SAE J1194-1999 was adopted into the OSHA provisions, the regulated community would have to consult not only the primary VCS but all of the VCSs that are incorporated into it as well. OSHA believes it is less burdensome for the regulated community to use one OSHA standard rather than require the purchase and use of several VCSs.

Government Standard: 30 CFR Part 75 - Sealing of Abandoned Areas - Emergency

Voluntary Standard

Temporary Standard. [Incorporated: 2007]

ACI 318-05 - Building Code Requirements for Structural Concrete and Commentary

Rationale

Four consensus standards were relied upon for various provisions in the emergency temporary standard, but no one consensus

ACI 440.2R-02 - Design and Construction of Externally Bonded FRP Systems for Strengthening Concrete Structures ASTM E119-07 - Standard Test Methods for Fire Tests of Building Construction and Materials ASTM E162-06 - Standard Test Method for Surface Flammability of Materials Using a Radiant Heat Energy Source

standard is available that covered all of the topics covered by MSHA's Emergency Temporary Standard.

Government Standard: 30 CFR Part 75 – Safety Standards for Underground Coal Mines (Section 75.403 – Maintenance of Incombustible Rock Dust) – [Incorporated: **2011**] [Incorporated: 2011]

Voluntary Standard

- ASTM C110-09 Standard Test Methods for Physical Testing of Quicklime, Hydrated Lime, and Limestone
- ASTM C737-08 Standard Specification for Limestone Dusting of Coal Mines

Rationale

MSHA issued a final rule in June 2011 that finalized an Emergency Temporary Standard (ETS) on Maintenance of Incombustible Content of Rock Dust in Underground Bituminous Coal Mines. The basis of the ETS and final rule was a recommendation of the National Institute for Occupational Safety and Health contained in their Report of Investigations 9679 published in 2010. The ASTM consensus standards do not include the NIOSH recommendations or address the specific hazard covered in the MSHA ETS and final rule.

Government Standard: Electric Motor-Drive Equipment Rule [Incorporated: 2001] Voluntary Standard Rationale

IEEE Standard 242-1986 Recommended Practice for Protection and Coordination of Industrial and Commercial Power Systems (IEEE Buff Book) and NFPA 70 - national Electric Code

The MSHA rule is a design-specific standards. The NFPA and IEEE standards were used as a source for the rule; however, the exact requirements of the rule were tailored to apply specifically to electric circuits and equipment used in the coal mining industry.

Government Standard: Exit Routes, Emergency Action Plans, and Fire Prevention Plans, 29 CFR 1910, Subpart E [Incorporated: 2003] **Voluntary Standard**

Life Safety Code, NFPA 101-2000

Rationale

The OSHA standard addresses only workplace conditions whereas the NFPA Life Safety Code goes beyond workplaces. However, in the final rule OSHA stated that it had evaluated the NFPA Standard 101. Life

Safety Code, (NFPA 101-2000) and concluded that it provided comparable safety to the Exit Route Standards. Therefore, the Agency stated that any employer who complied with the NFPA 101-2000 instead of the OSHA Standard for Exit Routes would be in compliance.

Government Standard: Fire Protection for Shipyards, 29 CFR Part 1915, Subpart P [Incorporated: 2004]

Voluntary Standard

NFPA 312-2000 Standard for Protection of Vessels During Construction, Repair, and Lay-Up

NFPA 33-2003 Standard for Spray Application Using Flammable or Combustible Materials

Rationale

Many consensus standards were relied on for various provisions in OSHA's final rule, including 15 consensus standards that are incorporated by reference. However, OSHA and its negotiated rulemaking committee determined that there was no, one consensus standard available that covered all the topics in the rule.

Government Standard: Longshoring and Marine Terminals; Vertical Tandem

Lifts [Incorporated: 2009]

Voluntary Standard

ISO 668:1995 - Series 1 freight containers--Classification, dimensions and ratings.
ISO 1161:1984 - Series 1 freight containers--Corner fittings--Specification.
ISO 1161:1984/Cor. 1:1990 - Technical corrigendum 1:1990 to ISO 1161:1984.
ISO 1496-1:1990 - Series 1 freight containers--Specifications and testing--Part 1: General cargo containers for general purposes.
ISO 1496-1:1990/Amd. 1:1993 -

Rationale

Several voluntary consensus standards were relied upon for the various provisions in the final rule, however, no single VCS is available to cover all the workplace applications that are addressed by OSHA. The Agency believes that it would be less burdensome for the regulated community to use one OSHA standard rather than purchase and use the nine individual consensus standards used in this rule.

Government Standard: OSHA's Respirable Crystalline Silica Standard for

Construction [Incorporated: 2016]

Voluntary Standard

ASTM's E 2625 – 09, Standard Practice for Health Requirements Relating to Occupational Exposure to Respirable Crystalline Silica for Construction and Demolition Activities

Rationale

Rationale for not using: OSHA's standard includes a number of requirements that differ from the specifications in the ASTM standard because the requirements in the OSHA standard better effectuate the purposes of the OSH Act and protect employees from the significant risks posed by exposures to respirable crystalline silica (silica). The major differences include:

Both standards contain tables that specify control measures and respiratory protection for several common construction tools and tasks. OSHA's table (Table 1) differs from the ASTM tables in several respects; the OSHA standard divides respirator requirements according to duration of tasks and includes short duration tasks. Gives employers required to do exposure assessment a choice between complying with a scheduled monitoring approach or a performance-oriented approach. Requires a written plan to be reviewed annually; made available to employees, their representatives, OSHA and NIOSH upon request; address restricting access and requires a competent person to implement the plan.

Differences between the medical surveillance programs include, the ASTM standard triggers medical surveillance for employees exposed above the PEL or other occupational exposure limit for 120 or more days a year, while the OSHA standard triggers medical surveillance for employees who are required to use a respirator under the silica standard for 30 or more days a year. Medical examinations to be conducted within 30 days, spirometry testing is mandatory, an X-ray classification of 1/0 triggers referral to a specialist, tuberculosis testing for the initial examination of all employees who qualify for medical surveillance, allows employees to make their own placement decisions and the OSHA standard withholds medical information from the employer because of privacy concerns.

Hazard communication and training specifications differ from requirements in the OSHA standard in the following ways, requires training of all employees covered by the standard. The OSHA standard is more performance-based in order to allow flexibility for employers to provide training.

Some training topics differ.

Recordkeeping specifications in the standard differ in that the ASTM standard specifies that medical and exposure records be retained for 40 years or for duration of employment plus 20 years.

Government Standard: OSHA's Respirable Crystalline Silica Standard for General **Industry and Maritime** [Incorporated: 2016] **Voluntary Standard**

ASTM's E 1132 – 06, Standard Practice for Health Requirements Relating to Occupational Exposure to Respirable Crystalline Silica

Rationale

Rationale for not using: OSHA's standard includes a number of requirements that differ from the specifications in the ASTM standard because the requirements in the OSHA standard better effectuate the purposes of the OSH Act and protect employees from the significant risks posed by exposures to respirable crystalline silica (silica). The major differences include:

The OSHA standard gives employers required to do exposure assessment a choice between complying with a scheduled monitoring approach or a performanceoriented approach, requires employers to establish regulated areas, requires a written plan to be reviewed annually and made available to employees, their representatives, and OSHA and NIOSH upon request.

Differences between the medical surveillance program include, that the ASTM standard triggers medical surveillance for employees exposed above the PEL or other occupational exposure limit (OEL) for 120 or more days a year, while the OSHA standard triggers medical surveillance for employees exposed at or above the action level (half the PEL) for 30 or more days a year. That the medical examinations to be conducted within 30 days, spirometry testing is not optional, X-ray classification of 1/0 triggers referral to a specialist, requires tuberculosis testing for the initial examination of all employees who qualify for medical surveillance, allows

employees to make their own placement decisions and the OSHA standard withholds medical information from the employer because of privacy concerns.

Government Standard: Sanitary Toilets in Coal Mines, 30 CFR 71, Subpart

E [Incorporated: 2003] Voluntary Standard

Non-Sewered Waste Disposal Systems--Minimum The ANSI standard was not incorporated by

Requirements, ANSI Z4.3-1987

Rationale

The ANSI standard was not incorporated by reference because certain design criteria allowed in the ANSI standard, if implemented in an underground coal mine, could present health or safety hazards. For instance, combustion or incinerating toilets could introduce an ignition source which would create a fire hazard. For certain other design criteria found in the ANSI standard, sewage could seep into the groundwater, or overflow caused by rain or run-off could contaminate portions of the mine.

Government Standard: Steel Erection Standards [Incorporated: 2002] Voluntary Standard Rationale

ANSI A10.13 - Steel Erection; ASME/ANSI B30 Series Cranes Standards

Many consensus standards were relied upon for various provisions in the final rule, but there was no one consensus standard available that covered all of the topics covered by OSHA's final rule.

Agency: Department of State (DOS)

Government Standard: The 2017 OBO Design Standards [Incorporated: 2016] Voluntary Standard Rationale

2015 International Building Code

The 2017 OBO Building Code adopts the 2015 International Building Code (IBC) as amended by the 2017 OBO International Codes Supplements (OBO-ICS). The 2017 ICS adds material that is not covered in the 2015 IBC but introduces the material in an industry-standard format so that the users are easily able to locate OBO-specific requirements.

Similarly, OBO provides master specification sections in an industry-standard format where no industry master exists, such as for Forced **Agency: Department of Transportation (DOT)**

Government Standard: 49 CFR 571.102, Transmission shift position sequence, starter

interlock, and transmission braking effect (2005) [Incorporated: 2016]

Voluntary Standard Rationale
SAE J915 This regula

This regulation was issued on July 1, 2005. SAE J915, "Automatic Transmissions-Manual Control Sequence," published on July 1, 1965, and updated on March 9, 2017. NHTSA has not incorporated this standard because its content currently relies on 49 CFR 571.102 and 571.114, and the SAE J915 abstract also states that some portions of the standard are unique and may not represent current common practices within the user community. NHTSA is evaluating industry standards to inform the next steps of any revisions to its regulations.

Government Standard: 49 CFR 571.114, Theft protection and rollaway prevention

(2006) [Incorporated: 2016]

Voluntary Standard

SAE J2948

Rationale

NHTSA published this regulation on April 7, 2006. SAE Recommended Practice, SAE J2948 "Keyless Ignition Control Design" was published on January 13, 2011. NHTSA reviewed and referenced SAE J2948 in an NPRM it issued on December 12, 2011, and is considering whether to finalize this regulatory action.

Government Standard: 49 CFR 571.123, Motorcycle controls and

displays [Incorporated: 2016]

Voluntary Standard Rationale

ISO 2575

NHTSA first published this regulation on April 12, 1977. ISO 2575, "Road vehicles -- Symbols for controls, indicators and tell-tales," was published in 2004, and specifies symbols for use on vehicle controls and indicators. On November 26, 2014, NHTSA issued an NPRM proposing to allow the use of an ISO 2575 warning label for ABS failure

indication. NHTSA is considering whether to finalize this regulatory action.

Government Standard: 49 CFR 571.129 New non-pneumatic tires for passenger cars

(1990) [Incorporated: 2016]

Voluntary Standard Rationale

SAE J918c

This regulation was published on July 20, 1990. Although not incorporated by reference, the performance and test requirements are based upon SAE recommended practice, "Passenger Car Tire Performance," J918c, last updated on May 1, 1970. NHTSA is evaluating industry standards to inform the next steps of any revisions to its regulations.

Government Standard: 49 CFR 571.138, Tire pressure monitoring systems

(2005) [Incorporated: 2016]

Voluntary Standard Rationale

SAE J2657

NHTSA published this regulation on April 8, 2005. SAE J2657, Tire Pressure Monitoring Systems for Light Duty Highway Vehicles, was published on December 16, 2004. While SAE J2657 was not incorporated in the final rule, the regulation has many commonalities. However, SAE J2657 does not contain requirements or test procedures for a malfunction indicator, and requires different levels of rigorousness. NHTSA is evaluating industry standards to inform the next steps of any revisions to its regulations.

Government Standard: 49 CFR 571.207, Seating Systems [Incorporated: 2016] Voluntary Standard Rationale

SAE J879; SAE J879B

This regulation was published on April 8, 2005. Although not incorporated by reference, the test procedures and performance requirements are based on SAE J879, "Passenger Car Front Seat and Seat Adjuster," published on November 1, 1963, and SAE J879B, "Motor Vehicle Seating Systems," published on July 1, 1968. NHTSA is evaluating industry standards to inform the next steps of any revisions to its regulations.

Government Standard: 49 CFR 571.226, Ejection Mitigation [Incorporated: 2016] Voluntary Standard Rationale

SAE J2568; BSI AU 209

This regulation was published on January 19, 2011. SAE J2568 - Intrusion Resistance of Safety Glazing Systems for Road Vehicles was published on April 24, 2001 and BSI AU 209 - Vehicle Security was published in August 1995. NHTSA studied the test procedures and performance requirements in these standards, but did not adopt them because they did not meet NHTSA's safety objectives and in some cases, were costlier. NHTSA is evaluating industry standards to inform the next steps of any revisions to this regulation.

Government Standard: 49 CFR 571.302 Flammability of Interior Materials

(1971) [Incorporated: 2016]

Voluntary Standard

ASTM D5132; SAE J369

Rationale

This regulation was published on December 2, 1971. Although not incorporated by reference, these standards are technically equivalent to the regulation: ASTM D5132, "Standard Test Method for Horizontal Burning Rate of Polymeric Materials Used in Occupant Compartments of Motor Vehicles," published in 1994 and SAE J 369, "Flammability of Polymeric Interior Materials - Horizontal Test Method," published on March 1, 1969. NHTSA initiated a research program in 2016 to evaluate the test procedures of the industry standards to inform the next steps of any revision to this regulation.

Government Standard: 49 CFR 571.304, Compressed natural gas fuel container integrity

(1974) [Incorporated: 2016]

Voluntary Standard ANSI/CSA NGV2

Rationale

The standard was published on September 26, 1994 and was based on ANSI/CSA NGV2, "Basic requirements for compressed natural gas vehicle fuel containers." NHTSA started a research program in 2015 to evaluate the performance tests in the revised version of NGV2 and also in the Global Technical Regulation No. 13, "Hydrogen and

fuel cell vehicles." NHTSA will use the research to inform the next steps of any revision to this regulation.

Government Standard: 49 CFR 571.305, Electric-powered vehicles: electrolyte spillage and electrical shock protection (2000) [Incorporated: 2016]

Voluntary Standard

SAE J1766

Rationale

The standard was issued on September 27, 2000, and was based on SAE J1766, "Recommended practice for electric and hybrid electric vehicle battery systems crash integrity testing," published on February 1, 1996. NHTSA reviewed the 2016 revision of SAE J1766 and other industry standards for electric vehicles in an NPRM it issued on March 10, 2016, and is considering whether to finalize this regulatory action.

Government Standard: 49 CFR Part 563, Event Data Recorders (2006) [Incorporated: 2016]

Voluntary Standard

SAE J1698-1; IEEE P1616

Rationale

This regulation was issued on August 28, 2006. NHTSA did not incorporate either the SAE Vehicle Event Data Interface (J1698–1) Committee or the IEEE Motor Vehicle Event Data Recorder (MVDER) working group (P1616) because both standards were developed and issued during the rulemaking process. NHTSA is evaluating industry standards to inform the next steps of any revisions to its regulations.

Government Standard: Brake Performance, 49 CFR 393.52 - FMCSA's Performance-Based Brake Testers (PBBTs) Requirement [Incorporated: 2002] **Voluntary Standard**

SAE J667 - Brake Test Code Inertia Dynamometer (cancelled February 2002)

SAE J1854 - Brake Force Distribution Performance Guide - Trucks and Buses

Rationale

FMCSA used government-unique standards in lieu of voluntary consensus standards when it implemented its final rule to allow inspectors to use performance-based brake testers (PBBTs) to check the brakes on large trucks and buses for compliance with federal safety standards and to issue citations when these vehicles fail (67 FR 51770, August 9, 2002). The FMCSA evaluated several PBBTs during a round robin test series to assess their functional performance and potential use in

law enforcement. The standard, a specific configuration of brake forces and wheel loads on a heavy-duty vehicle, was used to evaluate the candidate PBBTs and their operating protocols. The agency's rationale for use of the government-unique standards was to verify that these measurements and new technology could be used by law enforcement as an alternative to stopping distance tests or on-road deceleration tests. PBBTs are expected to save time and their use could increase the number of commercial motor vehicles that can be inspected in a given time. Only PBBTs that meet specifications developed by the FMCSA can be used to determine compliance with the Federal Motor Carrier Safety Regulations. The final rule represents a culmination of agency research that began in the early 1990s.

Agency: Environmental Protection Agency (EPA)

Government Standard: EPA Method 1 – Traverse Points, Stationary

Sources [Incorporated: 2001]

Voluntary Standard

ASTM D3154-00, Standard Method for Average Velocity in a Duct (Pitot Tube Method)

Rationale

1. The standard appears to lack in quality control and quality assurance requirements. It does not include the following: (1) Proof that openings of standard pitot tube have not plugged during the test; (2) if differential pressure gauges other than inclined manometers (e.g., magnehelic gauges) are used, their calibration must be checked after each test series; and (3) the frequency and validity range for calibration of the temperature sensors. 2. They are too general, too broad, or not sufficiently detailed to assure compliance with EPA regulatory requirements.

ASTM D3154-91 (1995), Standard Method for Average Velocity in a Duct (Pitot Tube Method)

Is too general, too broad, or not sufficiently detailed to assure compliance with EPA regulatory requirements.

Government Standard: EPA Method 10 [Incorporated: 2015] Voluntary Standard Rationale ANSI/ASME PTC 19-10-1981—Part 10, ISO 10396:1993 (2007), ISO 12039:2001, ASTM D5835-95 (2007), ASTM D6522-00 (2005), CAN/CSA Z223.2-M86 (1999), CAN/CSA Z223.21-M1978, ASTM D3162-94 (2005)

The use of these voluntary consensus standards would not be practical with applicable law due to a lack of equivalency, documentation, validation data and other important technical and policy considerations.

Government Standard: EPA Method 101 - Mercury Emissions, Chlor-Alkali Plants (Air) [Incorporated: 2001]

Voluntary Standard

ASTM D6216-98 - Standard Practice for Opacity Monitor Manufacturers to Certify Conformance with Design and Performance Specifications.

Rationale

The EPA is incorporating ASTM D6216 (manufacturers certification) by reference into EPA Performance Specification 1, Sect. 5 & 6 in another rulemaking. ASTM D6216 does not address all the requirements specified in PS-1.

Government Standard: EPA Method 101a - Mercury Emissions Sewer/Sludge Incinerator [Incorporated: 2001]

Voluntary Standard

ASTM D6216-98 - Standard Practice for Opacity Monitor Manufacturers to Certify Conformance with Design and Performance Specifications.

Rationale

The EPA is incorporating ASTM D6216 (manufacturers certification) by reference into EPA Performance Specification 1, Sect. 5 & 6 in another rulemaking. ASTM D6216 does not address all the requirements specified in PS-1.

Government Standard: EPA Method 10A – Carbon Monoxide for Certifying CEMS [Incorporated: 2001]

Voluntary Standard

CAN/CSA Z223.21-M1978, Method for the
Measurement of Carbon Monoxide: 3—Method of Sampling procedures; (2) procedures to correct for the carbon dioxide concentral Spectrometry.

(3) instructions to correct the gas volumed.

Rationale

1. It is lacking in the following areas: (1)
Sampling procedures; (2) procedures to
correct for the carbon dioxide concentration;
(3) instructions to correct the gas volume if
CO2 traps are used; (4) specifications to
certify the calibration gases are within 2
percent of the target concentration; (5)
mandatory instrument performance
characteristics (e.g., rise time, fall time, zero
drift, span drift, precision); (6) quantitative
specification of the span value maximum as
compared to the measured value: The
standard specifies that the instruments should
be compatible with the concentration of gases
to be measured, whereas EPA Method 10
specifies that the instrument span value

should be no more than 1.5 times the source performance standard. 2. Is too general, too broad, or not sufficiently detailed to assure compliance with EPA regulatory requirements.

Government Standard: EPA Method 12 – Inorganic Lead, Stationary

Sources [Incorporated: 2000]

Voluntary Standard

ASTM D4358-94 (1999), Standard Test Method for Lead and Chromium in Air Particulate Filter Samples of Lead Chromate Type Pigment Dusts by Atomic Absorption Spectroscopy

ASTM E1741-95 (1995), Standard Practice for Preparation of Airborne Particulate Lead Samples Collected During Abatement and Construction Activities for Subsequent Analysis by Atomic Spectrometry

Rationale

These ASTM standards do not require the use of glass fiber filters as in EPA Method 12 and require the use of significantly different digestion procedures that appear to be milder than the EPA Method 12 digestion procedure. For these reasons, these ASTM standards cannot be considered equivalent to EPA Method 12. Also, the subject ASTM standards do not require the use of hydrogen fluoride (HF) as in EPA Method 29 and, therefore, they cannot be used for the preparation, digestion, and analysis of Method 29 samples. Additionally, Method 29 requires the use of a glass fiber filter, whereas these three ASTM standards require cellulose filters and other probable nonglass fiber media, which cannot be considered equivalent to EPA Method 29.

These ASTM standards do not require the use of glass fiber filters as in EPA Method 12 and require the use of significantly different digestion procedures that appear to be milder than the EPA Method 12 digestion procedure. For these reasons, these ASTM standards cannot be considered equivalent to EPA Method 12. Also, the subject ASTM standards do not require the use of hydrogen fluoride (HF) as in EPA Method 29 and, therefore, they cannot be used for the preparation, digestion, and analysis of Method 29 samples. Additionally, Method 29 requires the use of a glass fiber filter, whereas these three ASTM standards require cellulose filters and other probable nonglass fiber media, which cannot be considered equivalent to EPA Method 29.

ASTM E1979-98 (1998), Standard Practice for Ultrasonic Extraction of Paint, Dust, Soil, and Air Samples for Subsequent Determination of Lead These ASTM standards do not require the use of glass fiber filters as in EPA Method 12 and require the use of significantly different

These ASTM standards do not require the use require the use of significantly different digestion procedures that appear to be milder than the EPA Method 12 digestion procedure. For these reasons, these ASTM standards cannot be considered equivalent to EPA Method 12. Also, the subject ASTM standards do not require the use of hydrogen fluoride (HF) as in EPA Method 29 and, therefore, they cannot be used for the preparation, digestion, and analysis of Method 29 samples. Additionally, Method 29 requires the use of a glass fiber filter, whereas these three ASTM standards require cellulose filters and other probable nonglass fiber media, which cannot be considered equivalent to EPA Method 29.

Government Standard: EPA Method 17 - Particle Matter (PM) In Stack

Filtration [Incorporated: 2001]

Voluntary Standard

ASME C00049

ASTM D3685/3685M-95 - Standard Test method EPA looked at this standard for both Pulp for Sampling and Determination of Particle Matter and Paper Hazardous Air Pollutant rules and for the Small Municipal Waste Combustion

Rationale

EPA looked at this standard for both Pulp and Paper Hazardous Air Pollutant rules and for the Small Municipal Waste Combustion rule. Contains sampling options beyond which would be considered acceptable for Method 5.

EPA looked at this standard for both Pulp and Paper Hazardous Air Pollutant rules and for the Small Municipal Waste Combustion rule. Contains sampling options beyond which would be considered acceptable for Method 5.

Government Standard: EPA Method 18 [Incorporated: 2016] Voluntary Standard Rationale

ASTM D6420-99 (2010) "Test method for Determination of Gaseous Organic Compounds by Would not be practical due to a lack of Direct Interface Gas Chromatography/Mass Spectrometry" equivalency, documentation, validation and other important technical and police.

The use of this voluntary consensus standard would not be practical due to a lack of equivalency, documentation, validation data and other important technical and policy considerations. The EPA did not receive comments during the notice and comment period that caused us to alter the standards and methods in the final permits.

Government Standard: EPA Method 2 – Velocity and S-type Pitot [Incorporated: 1999] **Voluntary Standard** Rationale

ASTM D3464-96 (2001), Standard Test Method Average Velocity in a Duct Using a Thermal Anemometer

ISO 10780:1994, Stationary Source Emissions--Measurement of Velocity and Volume Flowrate of shaped pitot, which historically has not been Gas Streams in Ducts

Applicability specifications are not clearly defined, e.g., range of gas composition, temperature limits. Also, the lack of supporting quality assurance data for the calibration procedures and specifications, and certain variability issues that are not adequately addressed by the standard limit EPA's ability to make a definitive comparison of the method in these areas. The standard recommends the use of an Lrecommended by EPA. The EPA specifies the S-type design, which has large openings that are less likely to plug up with dust.

Government Standard: EPA Method 21 - Volatile Organic Compound (VOC)

Leaks [Incorporated: 2003]

Voluntary Standard

ASTM E1211-97 - Standard Practice for Leak Detection and Location Using Surface-Mounted **Acoustic Emission Sensors**

Rationale

This standard will detect leaks but not classify the leak as VOC, as in EPA Method 21. In addition, in order to detect the VOC concentration of a known VOC leak, the acoustic signal would need to be calibrated against a primary instrument. Background noise interference in some source situations could also make this standard difficult to use effectively.

Government Standard: EPA Method 25 – Gaseous Nonmethane Organic

Emissions [Incorporated: 2001]

Voluntary Standard

EN 12619:1999 Stationary Source Emissions--Determination of the Mass Concentration of Total Gaseous Organic Carbon at Low Concentrations in Flue Gases--Continuous Flame Ionization **Detector Method**

ISO 14965:2000(E) Air Quality--Determination of The standards do not apply to solvent process Total Nonmethane Organic Compounds--Cryogenic Preconcentration and Direct Flame **Ionization Method**

Rationale

The standards do not apply to solvent process vapors in concentrations greater than 40 ppm (EN 12619) and 10 ppm carbon (ISO 14965). Methods whose upper limits are this low are too limited to be useful in measuring source emissions, which are expected to be much higher.

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Government Standard: EPA Method 25A – Gaseous Organic Concentration, Flame **Ionization** [Incorporated: 2001]

Voluntary Standard

EN 12619:1999 Stationary Source Emissions--Determination of the Mass Concentration of Total Gaseous Organic Carbon at Low Concentrations in Flue Gases--Continuous Flame Ionization **Detector Method**

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Government Standard: EPA Method 28 (Section 10.1) – Wood Heaters, Certificate and **Auditing** [Incorporated: 2003]

Voluntary Standard

ASME Power Test Codes, Supplement on Instruments and Apparatus, part 5, Measurement of Quantity of Materials, Chapter 1, Weighing Scales

ASTM E319-85 (Reapproved 1997), Standard Practice for the Evaluation of Single-Pan Mechanical Balances

Rationale

It does not specify the number of initial calibration weights to be used nor a specific pretest weight procedure.

This standard is not a complete weighing procedure because it does not include a pretest procedure.

Government Standard: EPA Method 29 – Metals Emissions from Stationary Sources [Incorporated: 2001]

Voluntary Standard

ASTM D4358-94 (1999), Standard Test Method for Lead and Chromium in Air Particulate Filter Samples of Lead Chromate Type Pigment Dusts by Atomic Absorption Spectroscopy

Rationale

These ASTM standards do not require the use of glass fiber filters as in EPA Method 12 and require the use of significantly different digestion procedures that appear to be milder than the EPA Method 12 digestion procedure. For these reasons, these ASTM standards cannot be considered equivalent to EPA Method 12. Also, the subject ASTM standards do not require the use of hydrogen fluoride (HF) as in EPA Method 29 and, therefore, they cannot be used for the

ASTM E1741-95 (1995), Standard Practice for Preparation of Airborne Particulate Lead Samples Collected During Abatement and Construction Activities for Subsequent Analysis by Atomic Spectrometry

ASTM E1979-98 (1998), Standard Practice for Ultrasonic Extraction of Paint, Dust, Soil, and Air Samples for Subsequent Determination of Lead

CAN/CSA Z223.26-M1987, Measurement of Total Mercury in Air Cold Vapour Atomic Absorption Spectrophotometeric Method

preparation, digestion, and analysis of Method 29 samples. Additionally, Method 29 requires the use of a glass fiber filter, whereas these three ASTM standards require cellulose filters and other probable nonglass fiber media, which cannot be considered equivalent to EPA Method 29. These ASTM standards do not require the use of glass fiber filters as in EPA Method 12 and require the use of significantly different digestion procedures that appear to be milder than the EPA Method 12 digestion procedure. For these reasons, these ASTM standards cannot be considered equivalent to EPA Method 12. Also, the subject ASTM standards do not require the use of hydrogen fluoride (HF) as in EPA Method 29 and, therefore, they cannot be used for the preparation, digestion, and analysis of Method 29 samples. Additionally, Method 29 requires the use of a glass fiber filter, whereas these three ASTM standards require cellulose filters and other probable nonglass fiber media, which cannot be considered equivalent to EPA Method 29. These ASTM standards do not require the use of glass fiber filters as in EPA Method 12 and require the use of significantly different digestion procedures that appear to be milder than the EPA Method 12 digestion procedure. For these reasons, these ASTM standards cannot be considered equivalent to EPA Method 12. Also, the subject ASTM standards do not require the use of hydrogen fluoride (HF) as in EPA Method 29 and, therefore, they cannot be used for the preparation, digestion, and analysis of Method 29 samples. Additionally, Method 29 requires the use of a glass fiber filter, whereas these three ASTM standards require cellulose filters and other probable nonglass fiber media, which cannot be considered equivalent to EPA Method 29. It lacks sufficient quality assurance and

quality control requirements necessary for

EPA compliance assurance requirements.

Government Standard: EPA Method 29 for the determination of the concentration of Hg [Incorporated: 2015]

Voluntary Standard

Rationale

ASTM D6784-02 (2008), "Standard Test Method The use of this voluntary consensus standard for Elemental, Oxidized, Particle-Bound and Total would be more expensive and is inconsistent Mercury in Flue Gas Generated from Coal-Fired Stationary Sources (Ontario Hydro Method)"

with the final Hg standard that was determined using EPA Method 29 data.

Government Standard: EPA Method 306 - Chromium Emissions, Electroplating and **Anodizing** [Incorporated: 2002]

Voluntary Standard

Rationale

ASTM D4358-94 (1999) - Standard Test Method for Lead and Chromium in Air Particulate Filter Samples of Lead Chromate Type Pigment Dusts by Atomic Absorption Spectroscopy

This MACT standard (Petroleum Refineries) only cites Method 29. Therefore, the following EPA comment is only applicable for Method 29 not Method 12 and 306: Method 29 requires the use of hydrofluoric acid (HF) in its process of digestion of the sample. ASTM D4358-94 (1999) does not require the use of HF; therefore, it cannot be used in the preparation, digestion, and analysis of Method 29 samples. Additionally, Method 29 requires the use of a glass fiber filter, whereas the subject ASTM standard requires cellulose filters and other probable non-glass fiber media, and this further negates their use as Method 29 equivalent methods. (Same comment as provided for ASTM E1741 and ASTM E1979).

Government Standard: EPA Method 306a - Chromium Emissions, Electroplating --Mason Jar [Incorporated: 2002]

Voluntary Standard

Rationale

ASTM D4358-94 (1999) - Standard Test Method for Lead and Chromium in Air Particulate Filter Samples of Lead Chromate Type Pigment Dusts by Atomic Absorption Spectroscopy

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non-glass fiber media, and this further negates their use as Method 29 equivalent methods. (Same comment as provided for ASTM E1741 and ASTM E1979).

Government Standard: EPA Method 311 "Analysis of Hazardous Air Pollutant Compounds in Paints and Coatings by Direct Injection Into a Gas

Chromatograph' [Incorporated: 2015]

Voluntary Standard

Rationale

Acetone, Methyl Acetate, and Parachlorobenzotrifluoride Content of Paints and

Coatings by Solid Phase Microextraction-Gas Chromotography

ASTM D6438 (1999)—Standard Test Method for This methods is impractical as an alternative to EPA Method 311 because it targets chemicals that are VOC and are not HAP

Government Standard: EPA Method 3A – Carbon Dioxide and Oxygen Concentrations, IAP [Incorporated: 1999]

Voluntary Standard

ISO 12039:2001, Stationary Source Emissions--Determination of Carbon Monoxide, Carbon Dioxide, and Oxygen--Automated Methods

Rationale

This ISO standard is similar to EPA Method 3A, but is missing some key features. In terms of sampling, the hardware required by ISO 12039:2001 does not include a 3-way calibration valve assembly or equivalent to block the sample gas flow while calibration gases are introduced. In its calibration procedures, ISO 12039:2001 only specifies a two-point calibration while EPA Method 3A specifies a three-point calibration. Also, ISO 12039:2001 does not specify performance criteria for calibration error, calibration drift, or sampling system bias tests as in the EPA method, although checks of these quality control features are required by the ISO standard.

Government Standard: EPA Method 5 [Incorporated: 2015] Rationale **Voluntary Standard**

ASME B133.9-1994 (2001), ISO 9096:1992 (2003), ANSI/ASME PTC-38-1980 (1985), ASTM D3685/D3685M-98 (2005), CAN/CSA Z223.1-M1977

The use of these voluntary consensus standards would not be practical with applicable law due to a lack of equivalency, documentation, validation data and other important technical and policy considerations.

Government Standard: EPA Method 515.4 – Chlorinated Acids in DW by LL Fast CG/ECD [Incorporated: 2003]

Voluntary Standard

ASTM D5317-98 -- Standard Test Method For Determination of Chlorinated Organic Acid Compounds in Water by Gas Chromatography With an Electron Capture Detector

Standard Method 6640 B for the chlorinated acids

Rationale

ASTM D5317-98 specifies acceptance windows for the initial demonstration of proficiency for laboratory fortified blank samples that are as small as 0 percent to as large as 223 percent recovery for picloram, with tighter criteria for other regulated contaminants. Therefore, this method permits unacceptably large control limits, which include 0 percent recovery.

The use of this voluntary consensus standard would have been impractical due to significant shortcomings in the sample preparation and quality control sections of the method instructions. Section 1b of Method SM 6640 B states that the alkaline wash detailed in section 4b2 is optional. The hydrolysis that occurs during this step is essential to the analysis of the esters of many of the analytes. Therefore, this step is necessary and cannot be optional. In addition, the method specifies that the quality control limits for laboratory-fortified blanks are to be based upon plus or minus three times the standard deviation of the mean recovery of the analytes, as determined in each laboratory. Therefore, this method permits unacceptably large control limits, which may include 0 percent recovery.

Government Standard: EPA Method 531.2 – N-Methylcarbamoylozimes/ates, Aqueous In/HPLC [Incorporated: 2003]

Voluntary Standard

Standard Method 6610, 20th Edition

Rationale

Standard Method 6610, 20th Edition has recently been approved for compliance monitoring. Standard Method 6610, 20th Supplemental Edition permits the use of a strong acid, hydrochloric acid (HCL), as a preservative. The preservatives in all of the other approved EPA and Standard Methods procedures for these analytes are weak acids that adjust the pH to a specific value based upon the pKa of the preservative. The use of HCL would require accurate determinations of the pH of the sample in the field and could be subject to considerable error and possible

changes in pH upon storage. Although not specifically observed for oxamyl or carbofuran during the development of similar methods, structurally similar pesticides have been shown to degrade over time when kept at pH 3. Therefore, approval of this method is impractical because it specifies the use of a strong acid (HCL) when positive control of the pH is critical.

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Government Standard: EPA Method 5i - Low Level Particulate Matter, Stationary

Sources [Incorporated: 2001]

Voluntary Standard

ASTM D6331-98

Rationale

This standard does not have paired trains as specified in method 5 and does not include some quality control procedures specified in the EPA method and which are appropriate to use in this rule.

Government Standard: EPA Method 7E [Incorporated: 2015] **Voluntary Standard** Rationale

ANSI/ASME PTC 19-10-1981—Part 10, ISO 10396:1993 (2007), ASTM D5835-95 (2007), CAN/CSA Z223.2-M86 (1999)

The use of these voluntary consensus standards would not be practical with applicable law due to a lack of equivalency,

documentation, validation data and other important technical and policy considerations.

Government Standard: EPA Method 9 [Incorporated: 2016] **Voluntary Standard** Rationale

ASTM D7520-09 "Standard Test Method for Determining Opacity of a Plume in the Outdoor Ambient Atmosphere"

The use of this voluntary consensus standard would not be practical due to a lack of equivalency, documentation, validation data and other important technical and policy considerations. The EPA did not receive comments during the notice and comment period that caused us to alter the standards and methods in the final permits.

Government Standard: EPA Method ALT 004 [Incorporated: 2002]

Voluntary Standard

ASTM D5835-95 - Standard Practice for Sampling Stationary Source Emissions for Automated Determination of Gas Concentration

ISO 10396:1993 - Stationary Source Emissions: Sampling for the Automated Determination of Gas CTM 022. Lacks in detail and quality Concentrations

Rationale Similar to Methods 3a, 6c, 7e, 10, ALT 004, CTM 022. Lacks in detail and quality assurance and quality control requirements. Very similar to ISO 10396.

Duplicates Method 3a, 6c, 7e, 10, ALT 004, assurance plus quality control requirements. Similar to ASTM D5835.

Government Standard: EPA Method CTM 022 [Incorporated: 2002] Rationale

Voluntary Standard

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Government Standard: EPA Performance Specification 2 (nitrogen oxide portion

only) [Incorporated: 2001] **Voluntary Standard**

ISO 10849:1996, Determination of the Mass

Concentration of Nitrogen Oxides--Performance

Is too general, too broad, or not sufficiently detailed to assure compliance with EPA

regulatory requirements.

Rationale

Government Standard: EPA Performance Specification 2 (sulfur dioxide portion only) [Incorporated: 2001]

Voluntary Standard

ISO 7935:1992, Stationary Source Emissions--Determination of the Mass Concentration of Sulfur Dioxide--Performance Characteristics of Automated Measuring Methods"

Rationale

Is too general, too broad, or not sufficiently detailed to assure compliance with EPA regulatory requirements.

Government Standard: SW846-6010b [Incorporated: 2002] Voluntary Standard Rationale

ASTM C1111-98 (1998) - Standard Test Method for Determining Elements in Waste Streams by Inductively Coupled Plasma-Atomic Emission Spectrometers

ASTM D6349-99 (1999) - Standard Test Method for Determining Major and Minor Elements in Coal, Coke, and Solid Residues from Combustion of Coal and Coke by Inductively Coupled Plasma-Atomic Emission Spectrometers

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Agency: General Services Administration (GSA)

Government Standard: Federal Specification KKK-A-1822E - Federal Specification for Ambulances [Incorporated: 2003]

Voluntary Standard

ASTM F2020 - Standard Practice for Design, Construction, and Procurement of Emergency Medical Services Ambulances

Rationale

The ASTM Standard Practice for Design, Construction, and Procurement of Emergency Medical Services (EMSS) Ambulances (ASTM F2020) is not practical for use, and therefore GSA uses the Federal Specification for Ambulances (KKK-A-1822E). GSA has determined the ASTM document is not practical for use for the following reasons:

1) GSA has determined that ASTM F2020 contains specific practices that are technically and economically impractical to use for the acquisition of commercial based vehicles

because the document is financially burdensome and technically ineffective. Specifically at issue is the ASTM Standard Specification for Medical Oxygen Delivery Systems for EMS Ground Vehicles, F1949-99 which is inclusive to ASTM F2020.

- 2) GSA has determined that ASTM F2020 is impractical because it is defined as a standard practice which is ambiguous and an ineffective substitution for specifications or requirements for use in GSA contract documents. ASTM F1949-99, a Standard Specification for Medical Oxygen Delivery Systems for EMS Ground Vehicles is included in ASTM F2020. ASTM F1949-99 is defined as a "standard specification".
- 3) GSA has determined that ASTM F2020 is impractical because ASTM International does not provide interpretations and written guidance to their publications which is inadequate and less useful. ASTM members may only offer personal opinions. ASTM offers no mechanism to support timely resolution of conflicts between contractor and procurement organizations on technical subject matter. GSA provides interpretations, clarifications and engineering determinations when required. This is one of the most important concerns presented by the Ambulance Manufacturers Division (AMD).
- 4) The AMD has determined through consensus that it is impractical to replace the Federal Specification for Ambulances, KKK-A-1822E with the ASTM Standard Practice, F2020. GSA initiated a survey to collect public responses from a wide range of constituent users of the Federal Ambulance Specification. The National Association of Emergency Medical Technicians (NAEMT), the International Association of Fire Chiefs (IAFC), the National Association of State EMS Directors (NASEMSD) and the National Association of EMS Physicians

universally accept and support the continued use of the Federal Specification. The AMD and constituent users have determined that it is impractical to replace the Federal Specification for Ambulances, KKK-A-1822E with the ASTM Standard Practice, F2020 because rule promulgation is burdensome and costly. Staff and administration resources would need to be diverted in each state EMS office to implement the change in statutes, public health codes, rules and regulations.

5) GSA has determined that ASTM F2020 is impractical because it is burdensome to GSA procurement efforts. While the current ASTM document recites many of the requirements from the Federal Specification, a future ASTM document would likely have diverging requirements unacceptable to the Government. This was verified by a member of the ASTM F2020 subcommittee at the September 4, 2003 meeting of the Federal Interagency Committee on Emergency Medical Services.

Government Standard: FF-L-2937 [Incorporated: 2006] Voluntary Standard Rationale

UL 768

Federal Specification FF-L-2937 — Combination Lock, Mechanical used in lieu of UL 768 Combination Locks. The lock covered by the GUS is used for the protection of classified information and weapons. The UL specification did not meet identified government needs for dialing tolerance and bolt end pressure.

Government Standard: MIL-G-9954 - Glass Beads for Cleaning and

Peening [Incorporated: 2000]

Voluntary Standard

SAE/AMS 2431 - Peening Media, General

Requirements

Rationale

This government-unique standard contains specific size & performance required for Air Force critical applications that are not present in the voluntary standards.

Agency: Department of Health and Human Services (HHS)

Government Standard: FDA Guidelines on Asceptic Processing (2004) [Incorporated: 20041

Voluntary Standard

ISO 13408-1 Asceptic Process ing of Health Care FDA is not using the ISO standard because Products, Part 1, General Requirements

Rationale

the applicability of these requirements is limited to only portions of aseptically manufactured biologics and does not include filtration, freeze-drying, sterilization in place, cleaning in place, or barrier-isolator technology. There are also significant issues related to aseptically produced bulk drug substance that are not included in the document

Agency: Department of Housing and Urban Development (HUD)

Government Standard: 24 CFR 3280 - Manufactured Home Construction and Safety

Standards [Incorporated: 2000]

Voluntary Standard

ANSI A119.1 - Recreation Vehicles and NFPA 501C - Standard on Recreational Vehicles

Rationale

HUD-Unique Manufactured Home Construction & Safety Standards. HUD was required by legislation to "establish Federal construction and safety standards for manufactured homes and to authorize manufactured home safety research and development". Recently, HUD retained a private consensus body (NFPA) to update and modernize the Manufactured Home Standards. At the conclusion of the development process, NFPA will submit the revised standard to HUD for regulatory adoption.

Agency: National Archives and Records Administration (NARA)

Government Standard: Lifecycle Data Requirements Guide, Second Edition (January 18, 2002) (NARA standard) [Incorporated: 2016]

Voluntary Standard

Rationale

RDA Steering Committee: Resource Description and Access--2015 Revision

The voluntary standards of the Resource Description and Access (RDA) do not meet

the precise needs of the agency.

Agency: Nuclear Regulatory Commission (NRC)

Government Standard: NRC NUREG-1556, "Consolidated Guidance about Materials

Licenses" [Incorporated: 2011]

Voluntary Standard

(ANSI) N 13.2-1969, "Guide for Administrative Practices in Radiation Monitoring"

Rationale

(ANSI) N 13.2-1969, "Guide for Administrative Practices in Radiation Monitoring," had been endorsed in Regulatory Guide 8.2, with the same title, issued in February, 1973. The standard has not been revised since its inception, and it now refers to obsolete technical practices and outdated requirements. Therefore, Revision 1 of RG 8.2, published in May, 2011, removed endorsement of ANSI N 13.2-1969. Guidance is now provided through two referenced NRC reports, which could be considered Government-unique standards: NUREG-1556, "Consolidated Guidance about Materials Licenses," and NUREG-1736, "Consolidated Guidance: 10 CFR Part 20—Standards for Protection against Radiation."

Government Standard: NRC NUREG-1736, "Consolidated Guidance: 10 CFR Part 20— **Standards for Protection against Radiation**" [Incorporated: 2011] **Voluntary Standard**

(ANSI) N 13.2-1969, "Guide for Administrative Practices in Radiation Monitoring"

Rationale

(ANSI) N 13.2-1969, "Guide for Administrative Practices in Radiation Monitoring," had been endorsed in Regulatory Guide 8.2, with the same title, issued in February, 1973. The standard has not been revised since its inception, and it now refers to obsolete technical practices and outdated requirements. Therefore, Revision 1 of RG 8.2, published in May, 2011, removed endorsement of ANSI N 13.2-1969. Guidance is now provided through two referenced NRC reports, which could be considered Government-unique standards: NUREG-1556, "Consolidated Guidance about Materials Licenses," and NUREG-1736, "Consolidated Guidance: 10 CFR Part 20—Standards for Protection against Radiation."

Agency: Department of Agriculture (USDA)

Government Standard: WILDLAND FIRE FOAM: GUS Number: 5100-307a; June 2007.

Title: Specification for Fire Suppressant Foam for Wildland Firefighting (Class A

Foam). [Incorporated: 2010]

Voluntary Standard

NFPA 1150 - Standard on Fire-Fighting Foam Chemicals for Class A Fuels in Rural, Suburban, and Vegetated Areas.

Rationale

Foam fire suppressants contain foaming and wetting agents. The foaming agents affect the accuracy of an aerial drop, how fast the water drains from the foam and how well the product clings to the fuel surfaces. The wetting agents increase the ability of the drained water to penetrate fuels. Foam fire suppressants are supplied as wet concentrates. This standard was developed with international cooperation for Class A Foam used in wildland fire suppression situations and equipment. Standard was created by the USDA Forest Service in cooperation with the Department of Interior (DOI), the State of California, Department of Forestry and Fire Protection and the Canadian Interagency Forest Fire Center. The Forest Service has not chosen to utilize NFPA 1150 as it is designed specifically for application by municipal fire agencies in the wildland-urban interface, utilizing apparatus and situations that they are likely to encounter. The Forest Service's GUS for foam products is specific to use by wildland fire equipment and situations that are unique, e.g. helicopter use of foams, remote storage situations, and varied quality of water sources in the wildland settings. The agency feels this standard more accurately reflects the needs and mission of the federal wildland fire suppression agencies.