FY 2009 Government Unique Standards used in lieu of Voluntary Consensus Standards

Agency: Access Board (ACCESS)
Rationale: 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: Voices of Safety International (VOSI) standard on lead in candle wicks
Rationale: 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: ASTM F1427-96 Standard Consumer Safety Specification for Bunk Beds
Rationale: 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)
Voluntary Standard
NFPA 70 - National Electric Code
NFPA 70E - Electrical Safety Requirement for Employee Workplaces.
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.

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.

Voluntary Standard
ACI 318-05 - Building Code Requirements for Structural Concrete and Commentary
ACI 440.2R-02 - Design and Construction of Externally Bonded FRP Systems for Strengthening Concrete Structures
ASTM E162-06 - Standard Test Method

Rationale
Four consensus standards were relied upon for various provisions in the emergency temporary standard, but no one consensus standard is available that covered all of the topics covered by MSHA's Emergency Temporary Standard.
for Surface Flammability of Materials
Using a Radiant Heat Energy Source

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

**Voluntary Standard**

**Rationale**
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.


**Voluntary Standard**

**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.


**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 1496-1:1990 - Series 1 freight

**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...
containers--Specifications and testing--Part nine individual consensus standards used in this rule. 1: General cargo containers for general purposes. ISO 1496-1:1990/Amd. 1:1993 -

**Government Standard:** Sanitary Toilets in Coal Mines, 30 CFR 71, Subpart E  [Incorporated: 2003]

**Voluntary Standard**
Non-Sewered Waste Disposal Systems--Minimum 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**
ANSI A10.13 - Steel Erection; ASME/ANSI B30 Series Cranes Standards

**Rationale**
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 Transportation (DOT)

**Government Standard:** 63 FR 17976; April 13, 1998 - Product Safety Signs and Labels  [Incorporated: 1998]

**Voluntary Standard**
ANSI Z535.4 - ANSI Requirements for Color Coded Header Messages for the Different Levels of Hazard

**Rationale**
NHTSA explained in the NPRM that the American National Standard Institute (ANSI) has a standard4 for product safety signs and labels (ANSI Z535.4) that identifies a hierarchy of hazard levels ranging from extremely serious to moderately serious and specifies corresponding hierarchies of signal words, i.e., “danger,” “warning,” and “caution,” and of colors. For the header, the ANSI standard specifies a red background with white text for “danger,” an orange background with black text for “warning,” and a yellow background with black text for caution.”

The ANSI standard specifies that pictograms should
be black on white, with occasional uses of color for emphasis, and that message text should be black on white. The agency noted in the NPRM that when it earlier updated the requirements for air bag warning labels to require the addition of color and pictograms, it had chosen not to adopt the colors specified in the ANSI standard. NHTSA chose to use yellow instead of orange in the background of the heading for the air bag warning label, even though the word “warning” was used, because of overwhelming focus group preference for yellow. Only two of the 53 participants preferred orange. Participants generally stated that yellow was more eye-catching than orange. Participants also noted that red (stop) and yellow (caution) had meaning to them, but not orange.

NHTSA asked for comment on three color options for the revised utility vehicle rollover warning label. Proposed label 1 used the ANSI color format with the heading background in orange with the words in black. The remainder of the label had a white background with black text and drawings. Proposed label 2 used a color scheme like the air bag warning labels, which is the same as the ANSI color format except that the background color for the heading in the label is yellow. Proposed label 3 employed the color scheme used in the focus groups - the heading area had a red background with white text. The graphic areas had a yellow background with black and white drawings. The text area had a black background with yellow text.

Despite focus group preference for the signal word “danger,” the agency proposed the use of the word “warning” as more appropriate to the level of risk. The agency also noted that the word “warning” is used in the air bag warning label.

Recognizing that it might encounter additional conflicts between focus group preferences and the ANSI standard in future rulemakings, NHTSA requested comments in the NPRM on the extent to which any final choice regarding colors and signal words should be guided by the focus group preferences instead of the ANSI standard. NHTSA
also requested comments on the broader issue of the circumstances in which it would be appropriate for agency rulemaking decisions to be guided by focus group results or other information when such information is contrary to a voluntary consensus standard such as the ANSI standard.

At this time (February 22, 1999), a final decision is still pending regarding its proposal to upgrade the rollover warning label. As to the general questions it posed in the NPRM, NHTSA recognizes that ANSI’s mission differs somewhat from that of the agency’s focus groups with respect to the labeling of hazardous situations. ANSI’s mission is to develop and maintain a standard for communicating information about a comprehensive hierarchy of hazards, while the focus groups’ mission is to design an effective label for a specific hazard. The agency recognizes further that, given the difference in their missions, their conclusions about the appropriate manner of communication might differ on occasion.

Since agency labeling decisions are highly dependent on the facts regarding the specific hazard being addressed, NHTSA anticipates making case-by-case determinations of the extent to which it should follow voluntary standards versus information from focus groups and other sources. NHTSA will rely on its own expertise and judgement in making determinations under the NTTAA and the statutory provisions regarding vehicle safety standards.

**Government Standard:** Air Bag Warning Label (1997)  [Incorporated: 1997]

**Voluntary Standard**

**Rationale**

The Air Bag Warning Label uses yellow as the background color, instead of orange, in accordance with an ANSI standard and uses a graphic developed by Chrysler Corporation to depict the hazards of being too close to an air bag, instead of the graphic recommended by the ISO. These decisions were based on focus group testing sponsored by the agency which strongly indicated that these unique requirements would be far more effective with respect to safety than the industry standards.
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)


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.


Voluntary Standard

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.


Voluntary Standard

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Voluntary Standard

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.

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 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.


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

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.
ASME C00049

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.

ASTM D3685/3685M-95 - Standard Test method for Sampling and Determination of Particle Matter in Stack Gases

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.

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

Rationale
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 L-shaped pitot, which historically has not been recommended by EPA. The EPA specifies the S-type design, which has large openings that are less likely to plug up with dust.


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.

EN 12619:1999 Stationary Source

Rationale
The standards do not apply to solvent process vapors
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 Total Nonmethane Organic Compounds—Cryogenic Preconcentration and Direct Flame Ionization Method 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.

ISO 14965:2000(E) Air Quality—Determination of Total Nonmethane Organic Compounds—Cryogenic Preconcentration and Direct Flame Ionization Method


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 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.


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.


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

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.
Absorption Spectroscopy 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.


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

It lacks sufficient quality assurance and quality control requirements necessary for EPA compliance assurance requirements.

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
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).


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

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

Voluntary Standard

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
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.

<table>
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<tr>
<th>Government Standard:</th>
<th>EPA Method 515.4 – Chlorinated Acids in DW by LL Fast</th>
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<tr>
<td>CG/ECD [Incorporated: 2003]</td>
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<tr>
<td><strong>Voluntary Standard</strong></td>
<td><strong>Rationale</strong></td>
</tr>
<tr>
<td>ASTM D5317-98 – Standard Test Method For Determination of Chlorinated Organic Acid Compounds in Water by Gas Chromatography With an Electron Capture Detector</td>
<td>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.</td>
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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.

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.

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.


Voluntary Standard
ASTM D5835-95 - Standard Practice for Sampling Stationary Source Emissions for

Rationale
Similar to Methods 3a, 6c, 7e, 10, ALT 004, CTM 022. Lacks in detail and quality assurance and
Automated Determination of Gas Concentration
ISO 10396:1993 - Stationary Source Emissions: Sampling for the Automated Determination of Gas Concentrations

**Government Standard:** EPA Method CTM 022 [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 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.

**Government Standard:** EPA Performance Specification 2 (nitrogen oxide portion only) [Incorporated: 2001]

**Voluntary Standard**

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

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

**Voluntary Standard**

**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**
This standard lacks details for instrument operation QA/QC, such as optimizing plasma operating conditions; upper limit of linear dynamic range; spectral interference correction; and calibration procedures, which include initial and continuous calibration verifications. Also lacks internal standard and method of standard addition options for samples with interferences.

This standard lacks details for instrument operation QA/QC, such as optimizing plasma operating
Elements in Coal, Coke, and Solid Residues from Combustion of Coal and Coke by Inductively Coupled Plasma-Atomic Emission Spectrometers

conditions, upper limit of linear dynamic range, spectral interference correction, and calibration procedures, that include initial and continuous calibration verifications. Also lacks details for standard preparation, and internal standard and method of standard addition options for samples with interferences.

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Agency: General Services Administration (GSA)

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.

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.

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<tbody>
<tr>
<td>Voluntary Standard</td>
<td>SAE/AMS 2431 - Peening Media, General Requirements</td>
<td></td>
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**Rationale**
This government-unique standard contains specific size & performance required for Air Force critical applications that are not present in the voluntary standards.

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**Agency:** Department of Health and Human Services (HHS)


<table>
<thead>
<tr>
<th>Voluntary Standard</th>
<th>ISO 13408-1 Aseptic Processing of Health Care Products, Part 1, General Requirements</th>
</tr>
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</table>

**Rationale**
FDA is not using the ISO standard because 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.

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**Agency:** Department of Housing and Urban Development (HUD)

**Government Standard:** 24 CFR 200.935 - Administrator qualifications and procedures for HUD building products and certification programs  [Incorporated: 2000]

<table>
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<tr>
<th>Voluntary Standard</th>
<th>ANSI A119.1 N - Recreation Vehicles</th>
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</table>

**Rationale**
HUD Building-Product Standards & Certification Programs. 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.

**Government Standard:** 24 CFR 3280 - Manufactured Home Construction and Safety
### Standards [Incorporated: 2000]

**Voluntary Standard**

<table>
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<tr>
<th>Description</th>
<th>Rationale</th>
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<tbody>
<tr>
<td>ANSI A119.1 - Recreation Vehicles and NFPA 501C - Standard on Recreational Vehicles</td>
<td>HUD-Unique Manufactured Home Construction &amp; 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.</td>
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### Agency: National Archives and Records Administration (NARA)

**Government Standard:** NARA data standard  [Incorporated: 2000]

**Voluntary Standard**

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<tr>
<td>Archives, Personal Papers, and Manuscripts (APPM); General International Standard Archival Description (ISAD(G)); International Standard Archival Authority Record for Corporate Bodies, Persons, and Families (ISAAR(CPF)); Encoded Archival Description (EAD); Machine Readable Cataloging (MARC)</td>
<td>These voluntary standards do not meet the precise needs of the agency.</td>
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### Agency: Department of Agriculture (USDA)


**Voluntary Standard**

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<tr>
<th>Description</th>
<th>Rationale</th>
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<tr>
<td>NFPA 1150 - Standard on Fire-Fighting Foam Chemicals for Class A Fuels in Rural, Suburban, and Vegetated Areas.</td>
<td>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 created by the USDA Forest Service in cooperation with the Department of Interior (DOI), the State of</td>
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</table>
California, Department of Forestry and Fire Protection and the Canadian Interagency Forest Fire Center.

The National Fire Protection Association (NFPA) does have a standard for Class A Foam, (NFPA 1150 - Standard on Fire-Fighting Foam Chemicals for Class A Fuels in Rural, Suburban, and Vegetated Areas). 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.