## FY 2015 Government Unique Standards used in lieu of Voluntary Consensus Standards

### Agency: Access Board (ACCESS)

<table>
<thead>
<tr>
<th>Voluntary Standard</th>
<th>Rationale</th>
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<tbody>
<tr>
<td>ANSI/IEEE Standard for Hearing Aid Compatibility with Wireless Devices</td>
<td>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 2007. 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.</td>
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### 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]

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<tr>
<td>Voices of Safety International (VOSI) standard on lead in candle wicks</td>
<td>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.</td>
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#### Government Standard: CPSC 16 CFR Parts 1213, 1500, and 1513 for Bunk Beds  [Incorporated: 2000]

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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

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 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.


Voluntary Standard

Rationale
Several voluntary consensus standards (VCS) 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 individual consensus standards it used to write the rule.

**Government Standard:** 29 CFR 1926 Subpart CC Cranes and Derricks in Construction

Incorporated: 2010

**Voluntary Standard**


**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

**Voluntary Standard**

SAE J1194-1999

**Rationale**

Many consensus standards were relied upon for various provisions in the emergency temporary standard. 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 Temporary Standard

Incorporated: 2007

**Voluntary Standard**

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


Voluntary Standard
- 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.


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/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:** 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)
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**

ANSI ISO

**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.

**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.

**[Incorporated: 2010]**

**Voluntary Standard**

SAE J2568—Intrusion Resistance of Safety Glazing Systems for Road Vehicles; BSI AU 209—Vehicle Security

**Rationale**

NHTSA studied the potential of applying these standards, but decided against adopting them for several reasons. These standards provide glazing intrusion resistance.
requirements from external impact (outside-in) as opposed
to ejection mitigation (inside-out). Additionally, the requirements are not
appropriate for vehicles with only side curtain air bags, given that there is a time
dependence associated with a curtain’s ejection mitigation performance. Once
deployed, the pressure in the air bag continuously decreases. The 16 km/h test is
done at 6 seconds to assure that the pressure does not decrease too quickly. It does not
seem that the 40 mm gap test could be done after the 6-second impact, in any timeframe
which is related to rollover and side impact ejections. Further, there was no shown safety
need for applying the suggested standards. We cannot show that ejections that would not
be prevented by the primary 100-mm displacement requirement would be
prevented by a secondary 40-mm requirement. Also, it seemed that the 40-mm
requirement would indirectly require installation of advanced glazing. The costs
associated with advanced glazing installations at the side windows covered by
the NHTSA standard are substantial in comparison to a system only utilizing
rollover curtains. For these reasons, the agency did not accept the standards.

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

**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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Government Standard:  EPA Method 17 - Particle Matter (PM) In Stack Filtration  [Incorporated: 2001]
Voluntary Standard  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.

Voluntary Standard

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


**Voluntary Standard**

**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.

**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
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

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.

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

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 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.

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

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**  
The use of this voluntary consensus standard would be more expensive and is inconsistent 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**  
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).

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

**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

Rationale
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

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.


Voluntary Standard

Rationale
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.


Voluntary Standard

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

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.

Standard Method 6640 B for the chlorinated acids

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.


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.

Standard Method 6610, 20th Supplemental Edition

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]

**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 D6331-98

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

**Rationale**

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.

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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, 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.

Agency: General Services Administration (GSA)
Voluntary Standard

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**
UL 768

**Rationale**
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)


**Voluntary Standard**
ISO 13408-1 Asceptic Processing of Health Care Products, Part 1, General Requirements

**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
Agency: Department of Housing and Urban Development (HUD)  
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: Nuclear Regulatory Commission (NRC)  
Voluntary Standard  

Rationale  

Voluntary Standard


Rationale


Agency:  Department of Agriculture (USDA)


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.