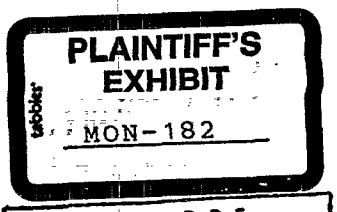
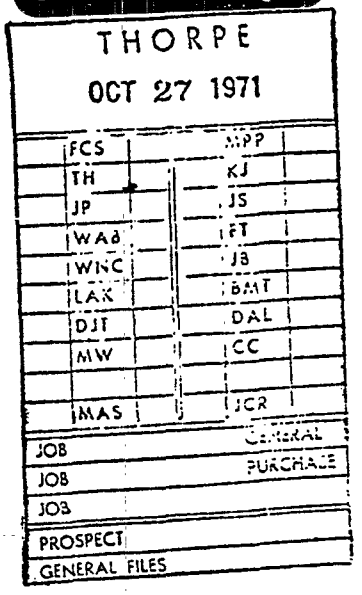
KELSEY-SEYBOLD CLINIC
6624 Fannin 526-2671
Houston, Texas 77025





October 20, 1971

Dear Sir:

The Kelsey-Seybold Clinic of Houston, Texas has formed a Consulting Service in Industrial Health in connection with our longstanding Occupational Health Services program.

We have enclosed two copies of a brochure which outlines the services available to you. This brochure also lists the men who are available to conduct surveys.

The new Occupational Safety and Health Act prompted the formation of this consulting service. We hope that we will be able to provide these services for your company. If you need additional information, please call us at 526-2671.

Thank you very much for your consideration.

Sincerely yours,

Maurice B. Johnston M.D.

Maurice B. Johnston, M.D., F.A.C.Pr.M.
Occupational Health Services

MBJ/nb

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OCCUPATIONAL HEALTH SERVICES
INDUSTRIAL HYGIENE CONSULTATION

KELSEY-SEYBOLD CLINIC
6624 FANNIN
HOUSTON, TEXAS 77025
(713) 526-2671

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Introduction

The Occupational Health Services Section of The Kelsey-Seybold Clinic has served progressive industry for years, specializing in medical problems associated with patients' occupations. Services have included periodic health examinations for executives and other employees and concern for diseases and injuries related to the business activities of the patient.

In consequence of the implementation of major Federal legislation, the Clinic has now expanded its capabilities to include specialists in Industrial Hygiene. We are now prepared to assist management in providing a safe and healthful work environment and complying with the requirements of recent legislation.

Industry has long recognized moral, ethical and legal responsibilities for providing safe and healthful working conditions, proper sanitation based on sound medical principles and accepted environmental health standards. The Occupational Safety and Health Act, enacted on December 29, 1970, greatly expands these responsibilities. The measure has broad implications for businesses of all sizes, including employers with as few as one or two employees on the payroll.

In sum, the law requires employers to provide safe places of employment, free from health hazards. Records of deaths, injuries and illnesses related to the work situation must be kept, and must be made available to governmental agencies and employees upon request. Inspections by authorized governmental agents may be made without notice, and employees can participate in such inspections. Any worker or labor union representative may request a visit by a government inspector. The requirements that industry continue its concern for product safety under laws such as the Federal Hazardous Substances Labeling Act and other laws to protect consumers and users of manufactured products remain in force.

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Occupational Hazards

Many work situations involve exposures to hazardous physical and chemical agents and other environmental conditions which can be detrimental to the health or efficiency of employees. Typical examples include:

...inadequate lighting, leading to eye strain as well as reduced employee productivity and efficiency.

...high noise levels, with the potential for employee discomfort, temporary or permanent physical damage to hearing, psychological disorientation and other undesirable effects. High noise levels are not restricted to heavy manufacturing, but may arise as well from computer facilities and other office machines.

...exposure to toxic substances from manufacturing, formulation or application processes and operations. Such exposures may produce acute effects that are immediately obvious, but also more subtle, frequently undetectable manifestations from long term exposure to lower concentrations.

...fire hazards with inadequate attention to fire prevention, fire fighting and employee safety.

...hazards to life and limb as a result of inadequate provision for protective clothing, equipment, training and safe practices in all phases of business operations.

It seems reasonable to anticipate that the extent to which a given business meets the requirements of the Occupational Safety and Health Act will be a major determinant of insurability and premium costs.

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Occupational Health and Safety

The Occupational Safety and Health Act of 1970 (PL 91-596)[1] is now law, and took effect May 1, 1971. The law requires employers to maintain a work place free from "...recognized hazards that are causing or likely to cause death or serious physical harm to his employees." To this end, the law mandates:

...setting of standards by the Secretary of Labor (of the United States) for employee protection.

...inspections of the work situation, with employee representation at inspections.

...employees who believe a violation to exist may request governmental inspections. In case an employee believes there is "imminent danger", he can request an immediate investigation through a special telephone contact at the Department of Labor in Washington.

...record keeping and monitoring of work-related injuries and illnesses by employers.

...promulgated standards may require monitoring and recording of exposure to harmful materials, and employees may have access to such records.

...enforcement by means of citations issued for violations.

...hearings to be conducted by an Occupational Safety and Health Review Commission to rule on alleged violations.

...cessation of plant operations in cases of "imminent danger".

[1] COPIES OF THE LAW AND STANDARDS MAY BE OBTAINED FROM THE GOVERNMENT PRINTING OFFICE, WASHINGTON, D. C. 20402. REQUEST PART 2 OF THE FEDERAL REGISTER DATED MAY 29, 1970.

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...establishment of a National Institute for Occupational Safety and Health within the Department of Health, Education and Welfare, the purpose of which is conduct research in this vital field.

In accordance with the provisions of this Law, the Texas Occupational Safety Board, reporting directly to the Governor, has been approved for the administration of the Law within the State of Texas. An active inspection program is a key requirement of compliance with the Law. An active training program for inspectors is in progress.

The Occupational Health Services Section of The Kelsey-Seybold Clinic now offers clients the requisite technical expertise to contend with existing or potential problems involving occupational health and safety. This service is offered on a professional consulting basis. The precise activities required and the time commitment involved will be determined by the nature of the problem. Some typical examples:

...assessment of a noise hazard, involving detailed measurements of noise levels and establishment of a "Noise Profile" for the installation. Audiometric surveys of employees and institution of a routine program of periodic audiometric acuity checks might also be involved. Employee protection practices would be recommended where needed, and "hazardous areas" defined. The noise profile is additionally useful for planning future plant expansions or modifications to minimize noise problems.

...determination of exposures to toxic agents. This might require air sampling programs within the plant to measure concentrations of toxic organic vapors, inorganic toxicants

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such as heavy metals, particulate matter composed of or containing toxic chemicals, etc. Samples would be analyzed and a dosage (concentration-time exposure) established. Alterations to processes, procedures or operations would be recommended to bring the installation into compliance with the law and a generally healthful, safe operation. To the extent necessary, the possibility of contamination of environmental contacts such as food and water would be determined.

...determination of the toxicological properties of a product or raw materials may be necessary. This would provide information to make recommendations with respect to the storage, handling and use, as well as to the requirements of law in terms of precautions and labels.

...survey of installations for general safety practices in terms of fire, accidents, sanitation and lighting.

...survey of the work environment for hazards due to the use of radioactive materials or other potentially hazardous forms of electromagnetic radiations.

Solving the Problem

As the first approach to resolving concern for occupational health and safety, The Kelsey-Seybold Clinic recommends one or two days of consultation with our Industrial Hygiene specialists. This activity, which is especially attractive for the smaller business or industrial establishment, will serve to provide an overview of the work situation in terms of the operations involved. Potential problem areas can thereby be detected and identified, and in many instances it can be

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established that the environment presents no significant hazards.

Where potential problems are disclosed by a preliminary review, a more detailed investigation will be recommended and outlined. The client is always advised, before any work is undertaken, precisely what will be done, the reasons for these actions, and the estimated cost. Detailed studies will generally include a review of absenteeism rates, history of work-related injuries, identification of hazardous situations, and where and to the extent necessary, actual measurement and quantification of the hazards. Measurements may involve toxic gases in the plant, noise levels in plant or office, temperature extremes, vibration, undesirable discharges, unsatisfactory sanitation conditions, illumination, and others as necessary. Where the most complete study is indicated, special attention is accorded possible synergistic effects of several stresses at individually acceptable low levels which could produce an overall stressful and unhealthful situation.

Brief professional resumes of our Industrial Hygiene specialists are included.

All environmental determinations are made by the use of generally accepted analytical and measurement techniques, procedures and instrumentation under the direct supervision of expert professionals.

The cost of these services will be based on the time commitment requirement and the complexity of the study. As noted, estimates of costs are provided management before work is initiated.

Summary

The Occupational Health Services Section of The Kelsey-Seybold Clinic offers business management a completely integrated service, including:

...advice and counsel to management with regard to the provisions and

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requirements of the Law and the characteristics of a safe and healthful work environment.

...environmental assessment and definition of problem situations by the application of generally accepted instrumentation and methodologies.

...interpretation of measurement data in terms of health and safety requirements and the Law.

...recommendations with respect to remedial measures where necessary to assure a safe and healthful work situation, compliance with the Law and guidance in planning for the future. Remedial measures may involve the definition of hazardous areas or operations, substitution in materials or processes, provision of protective equipment, clothing or devices, training of personnel, installation of monitoring or surveillance instrumentation or controls, etc.

...assistance to companies in the event of legal involvements.

For further information or to arrange the initial interview, please call (713) 526-2671, ext. 216.

Curriculum Vita

Stanley M. Pier, Ph.D.

B.S. - Chemistry
M.S. - Organic Chemistry/Inorganic Chemistry
Ph.D. - Organic Chemistry/Theoretical Physics/ Inorganic Chemistry

Associate Professor of Environmental Health, The School of Public Health of The University of Texas at Houston

Director of Environmental Sciences, The Pace Company Consultants & Engineers

Specialties: Environmental Health • Tests and Measurements in Occupational and Environmental Health • Air Pollution • Water Pollution • Noise Pollution

Professional Societies: American Public Health Association • Air Pollution Control Association • Water Pollution Control Association • American Society for Testing and Materials • American Chemical Society • Sigma Xi • Phi Lambda Upsilon • Research Society of America

Richard K. Severs, Ph.D.

B.S. - Physics
M.A. - Administration
Ph.D. - Environmental Health

Assistant Professor of Environmental Health, The School of Public Health of The University of Texas at Houston

Specialties: Environmental Health • Instrumentation • Air Pollution • Ergonomics

Professional Societies: American Industrial Hygiene Association • American Public Health Association • Texas Public Health Association • Air Pollution Control Association • American Institute of Physics • American Association of Physics Teachers

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COPY OF NEWS RELEASE
U. S. DEPARTMENT OF LABOR
OFFICE OF INFORMATION, WASHINGTON, D.C.

FOR RELEASE: IMMEDIATE, WEDNESDAY, JUNE 7, 1972

OSHA ESTABLISHES NEW STANDARD FOR EMPLOYEE EXPOSURE TO ASBESTOS DUST

A new standard for employee exposure to asbestos dust, limiting concentrations to 2 fibers, which are longer than 5 micrometers, per cubic centimeter of air on a time-weighted average, effective July 1, 1976, was announced today by the Occupational Safety and Health Administration (OSHA).

The current permissible time-weighted average concentration of 5 fibers of asbestos longer 5 micrometers, established originially in an emergency temporary standard last December 7, will be continued until July 1, 1976.

The standard also establishes a ceiling concentration of 10 fibers, not to be exceeded at any time.

George C. Guenther, Assistant Secretary of Labor for OSHA, said the new standard was adopted after consideration of recommendations from the National Institute for Occupational Safety and Health (NIOSH) of the Department of Health, Education, and Welfare; of the OSHA Advisory Committee on Asbestos Dust, and of comments from interested persons, including presentations in a four-day public hearing.

The new standard provides the following:

Acceptable Concentrations -- As of July 1, 1976, time-weighted average concentrations of asbestos fibers longer than 5 micrometers will not be allowed to exceed 2 fibers per cubic centimeter of air. The current time-weighted average concentrations of 5 fibers will be permitted until July 1, 1976.

METHODS OF COMPLIANCE -- Feasible technological controls and appropriate work practices are required as the primary means of compliance. Rotation of employees to reduce their exposures is allowed only in "exceptional circumstances". Personal protective equipment, such as respirators, cannot be relied upon, in large part because such devices are so uncomfortable as to be burdensome except for short periods.

The standard includes these other compliance requirements:

-- Hand tools that may produce or release asbestos fibers in excess of the limits must be provided with local exhaust ventilation systems.

-- Insofar as practicable, asbestos must be handled, mixed, applied, removed, cut, scored or otherwise worked in a wet state to reduce fiber emissions unless this would diminish the usefulness of the product.

-- No asbestos cement, mortar, coating, grout, plaster or similar material containing asbestos can be removed from shipping bags or other containers without being either wetted, enclosed or ventilated.

-- Where respirators are permitted, they must be selected from among the

types approved by the Bureau of Mines or NIOSH. Extensive details are given on types of respirators and conditions for their use. No employee may be assigned to a task requiring a respirator if a physician determines it would affect his job functioning or his health.

-- The employer must provide and require the use of special protective clothing, change rooms, and two separate lockers for the employees street and work clothes. The employer also must exercise care in laundering and other handling of contaminated clothing.

-- External work area surfaces must be kept free of excessive accumulations of asbestos fibers. Waste must be collected in sealed, impermeable bags or other such containers.

MONITORING -- Employers must establish monitoring systems to make certain every employee's exposure to asbestos fiber is below the prescribed limits. If the limits are exceeded, the employer must undertake a compliance program. Therefore, the standard also requires monitoring at intervals no longer than 6 months and gives employees or their representatives the opportunity to observe the monitoring and to have access to such records.

WARNING SIGNS -- Caution signs are to be displayed in areas where asbestos concentrations may exceed the exposure limits. Caution labels must be affixed to all raw materials, mixtures, scrap, waste, debris and other products containing asbestos fibers, or to their containers. However, no label is required where asbestos has been modified by a bonding agent, coating, binder or other material that would prevent release of above-limit concentrations.

RECORDKEEPING -- Employers must maintain records of personal or environmental monitoring, keep them for at least 3 years, and make them available upon request to OSHA or NIOSH. Every current and former employee is given opportunity for reasonable access to any records indicating their exposure to asbestos dust. Any employee found to have been exposed at any time to airborne concentrations in excess of the limits must be notified in writing no later than 5 days after the finding, and informed as to corrective action being taken.

MEDICAL EXAMINATIONS -- The employer must provide, or make available at his cost, medical examinations. Within 30 days of an employee's first employment in a job involving asbestos exposure, the employer must provide a comprehensive medical examination, including a chest X-ray and pulmonary tests. By January 31, 1973, and at least annually thereafter, every employer shall provide or make available comprehensive medical examinations to employees in asbestos exposure areas. A similar examination is to be provided within 30 days before or after termination of employment.

MEDICAL RECORDS -- Employers whose employees have been examined under the standard must maintain complete records of these examinations and retain them for at least 20 years. The contents of the records are to be made available for inspection and copying to the Assistant Secretary of Labor for OSHA, the Director of NIOSH, authorized physicians and medical consultants of either agency, and, upon request of an employee or former

employee, to his physician. Any physician who conducts an examination under the standard must furnish the employer all information required by the standard, and any other medical information related to occupational exposure to asbestos fibers.

AFFECTED EMPLOYMENT -- This general standard covers also employees in construction, ship repairing, shipbuilding, shipbreaking and longshoring who normally are subject to construction and maritime standards.

All parts of the new standard go into effect July 7 of this year except for the reduction from 5 fibers to 2, which takes effect July 1, 1976. The standards is scheduled for publication in the Federal Register June 7.