



Kate Cooper

RECEIVED

MAY 8 1975

J. T. BARR

Subject

PVC/OSHA

INTEROFFICE
MEMORANDUM

Program Directive MAY 16 1975

To J. T. Barr

(Location, Organization, or Department)

From R. H. Schenck

(Location, Organization, or Department)

You have asked for my comments on Item 35(b), page 17 of the OSHA Program Directive. You have specifically asked whether the requirement of immediate verbal notification is satisfied by a red alarm light. The requirement of immediate verbal notification is not found in the Regulation. The reason for the requirement is obviously to afford the employee notice as quickly and effectively as possible that the permissible limits have been exceeded, and that respirators are required for those who have not elected to forego them. In my opinion the red alarm light satisfies the requirement in the Regulation even though it does not conform to the Program Directive.

You have also asked whether the medical examination provided for in 1910.93 q (k)(1) must be performed prior to the employee's first entry to a restricted area. The Regulation states that the examination shall be performed "at the time" of initial assignment, and the Program Directive provides that the physician's statement should be furnished to the employee within 2 to 4 weeks after the examination (Item 28 page 14). The combination of these two leads me to believe that where it is infeasible to conduct the medical examination prior to initial assignment in a restricted area, it may be performed shortly thereafter, but that the statement should be furnished to the employee within 2 to 4 weeks of initial assignment.

RH Schenck

R. H. Schenck

RHS*swc

AP00026897

Send to all
Plant Mgrs &
Plant Engrs
for the plant.
XC to TCC
AKM
JH.

I-W
S&H
OSHA

MI 10 TO MANAGERS

W. Nelson

J. F. Odom

NEW OSHA POLICY AIDS WORKER COMPLAINTS

It is now easier for worker complaints about unsafe or unhealthful working conditions that fall on the deaf ears of management to be taken directly to the U. S. Occupational Safety & Health Administration (OSHA). Under a new policy, any employee who believes a hazardous condition exists in his workplace can request an inspection by notifying the nearest OSHA office, says OSHA's chief, John H. Stender. The complaints previously had to be in writing and signed, and had to describe in adequate detail the suspected violation. Mr. Stender says the new policy also directs OSHA field staff members to assist in the preparation of these complaints and to withhold the complainant's name upon request (to avoid possible employer retribution).

ADVICE FOR 'HUNTERS': RECRUIT OUT OF SEASON

In the current economy, few managerial minds are on campus recruiting. But, notes Roy W. Walters & Associates Inc. in its *Job Enrichment Newsletter*, the companies with the best recruiting records generally are those which continue to pursue their long-term "person-power" goals through good times and bad. One recruiting tip: avoid using irrelevant or ineffectual brochures or other literature; young people today want to know how a company uses its people, not what machines it has.

HOW LONG CAN YOU KEEP A TRADE SECRET?

If you can avoid leaks, there is no legal limit as to how long a trade secret can be retained as confidential, write Charles F. Hemphill Jr. and Thomas Hemphill in *The Secure Company*, Dow Jones-Irwin Inc. (\$12.95), Homewood, Ill. It remains the originator's property until it's no longer secret or no longer used. He is entitled to protection as long as he stays in business.

GIVE LESS MORE OFTEN

One way to keep morale higher for longer periods is to give pay raises more often—but in smaller amounts. Instead of one big raise in a set period of time, distribute two or more raises over the same period, suggests Prentice-Hall Inc.'s *Executive Report*. Increased productivity and morale should more than offset the additional paperwork.

INTERIOR DEPT. OFFERS 'ENERGY PERSPECTIVES'

"Complete enough for the experts but understandable to laymen" is the way the Interior Dept. describes its newly published data book on energy, *Energy Perspectives*. The 210-page illustrated volume contains statistics on reserves, production, consumption, and other aspects of major fuel sources. It's available for \$3.30 from the Superintendent of Documents, Government Printing Office, Washington, D. C. 20402. Order number is S/N 024-000-00812-6.

AP00026898

FEDERAL OCCUPATIONAL SAFETY AND HEALTH ACT
APCI CORPORATE SAFETY DEPARTMENT GUIDE SHEET #20

OSHA Standards for Safety Color Coding Plant

Equipment and Piping

There has been some confusion as to the provision of OSHA stating that all industries must color mark physical hazards and safety, firefighting and protective equipment.

In order to eliminate the confusion in APCI facilities, the following, which has been extracted from the American National Standards Institute (ANSI), shall apply.

RED

Red shall be the basic color for the identification of fire protection equipment and apparatus, danger and stop.

1. Fire Protection Equipment and Apparatus

Standards require that fire alarms, fire blanket boxes, fire pumps, industrial fire hydrants, fire buckets, sirens, sprinkler pipes, hydrant houses, fire warning control boxes, and fire exit signs be painted red.

Fire extinguishers shall also be painted red except where other finishes are specified in the APCI Safety Standards. Where other finishes are specified, the fire extinguisher cabinet housing, wall or support must be painted red to identify the extinguisher location.

The reels, housings or supports of all fire hoses must be coded with red, as well as sprinkler system post indicator valves. Fire hydrant post indicator valves shall also be red.

2. Danger

According to the safety code, red lights must be provided at barricades and temporary obstructions, and danger signs must be painted red.

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NOTE: The safety code allows yellow and black stripes or checks to be used interchangeably with solid yellow to attract the most attention to a given situation.

ORANGE

Orange shall be used as the basic color for designating dangerous parts of machines or energized equipment which may cut, crush, shock or otherwise injure and to emphasize such hazards when enclosure doors are open or when gear, belt or other guards around moving equipment are open or removed, exposing unguarded hazards.

Some typical areas where orange coding is required include safety starter buttons and the inside of transmission guards for gears, pulleys, or chains.

The exposed parts (edges only) of pulleys, gears, rollers, cutting devices and power jaws must be painted orange, as well as the inside of movable guards.

PURPLE

Purple shall be the basic color for designating radiation hazards. Yellow shall be used in combination with purple for markers such as tags, labels, signs and floor markers.

X-ray, alpha, beta, gamma, neutron, proton, deuteron and meson are the kinds of radiation covered.

The safety code further requires the use of purple signal lights to indicate when radiation-producing machines are in use.

GREEN

Green shall be used as the basic color for designating "safety" and the location of first aid equipment other than fire fighting equipment.

Typical kinds of safety equipment that require the green color coding to mark the location are air packs, first aid kits and stretchers.

First aid dispensaries, safety showers, eye wash stations and safety bulletin boards should also be green.

<u>Color</u>	<u>ASA Class</u>	<u>Use</u>	<u>Examples</u>
Blue	P	Protective Materials	All Protective Materials Other Than Fire Protection
Green	S	Safe Materials	Low Temperatures and Pressures Non-Poisonous Non-Flammable, Such as Water, Syrups, Glycols (Not for Cryogenic Service)

NOTE: All piping is to be identified as to contents and directional flow arrows affixed.

It must be remembered that the color coding of a hazardous piece of equipment, a location or piping should never be accepted as a substitute for eliminating the hazard whenever possible.

HWS:bls
September 1973

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OSHA REPORT

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Novak
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Rones
Callahan
Kramer
T.L. Gray
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J. Odom
FEB 06 1975

A Center for Occupational and Environmental Safety and Health to study the health effects of potentially hazardous substances on industrial workers has been established at Stanford Research Institute (SRI), Menlo Park, CA. One of the first projects to be undertaken is a major study for the National Institute for Occupational Safety and Health (NIOSH) to gather data on 18 occupational hazardous chemicals, including acetylene, carbon dioxide, carbaryl, and methyl alcohol. The \$2.5 million project is scheduled to be completed in 3 years. Researchers will:

- Evaluate work practices related to each chemical in industry
- Document and describe existing data and needed research studies for each hazardous material
- Recommend an industry standard for each substance, if appropriate, and include safeguards and special work practices.

Following industrial plant investigations, literature searches, and extensive reviews by experts, SRI will prepare recommendations that may serve as a basis for Federal standards.

How much has your plant spent to comply with OSHA standards? In an attempt to get some actual expenditure figures, the National Association of Manufacturers, Washington, DC, recently polled its members. Here are some average estimates:

- Plants with 1 to 100 employees—\$24,000 for safety, \$11,000 for health. Total cost of compliance, \$35,000
 - Plants with 101 to 500 employees—\$50,500 for safety, 23,000 for health. Total cost of compliance, \$73,500
 - Plants with 501 to 1000 employees—\$141,140 for safety, \$209,627 for health. Total cost of compliance, \$350,767
 - Plants with 1001 to 2000 employees—\$272,000 for safety, \$58,630 for health. Total cost of compliance, \$330,630
 - Plants with 2001 to 5000 employees—\$552,000 for safety, \$278,000 for health. Total cost of compliance, \$830,000
 - Plants with 5001 or more employees—\$2,226,500 for safety, \$2,455,000 for health. Total cost of compliance, \$4,681,500.
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CHB

* The National Institute for Occupational Safety and Health (NIOSH) has recommended that worker exposure to ammonia be limited to a maximum concentration of 50 parts per million (ppm) of air, as determined by a 5-minute sampling period. The present OSHA standard limits exposure to 50 ppm on an 8-hour, time-weighted average. NIOSH believes that the effects of ammonia appear to depend more on concentrations than on length of exposure. For this reason, a standard expressed as a time-weighted average is inappropriate since it permits fluctuations to concentrations considerably higher than 50 ppm.

Box score of OSHA enforcement activity:

	Inspections per month	Violations per inspection	Penalty per violation
October	6458	4.0	\$27
September	6435	3.7	\$25
August	7354	3.5	\$27

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