

CHEMICAL MANUFACTURERS ASSOCIATION

Minutes of Meeting

Occupational Safety and Health Committee

CMA Board B Conference Room
2501 M Street, NW
Washington, DC 20037

Wednesday
September 15, 1982
9:15 AM - 4:00 PM

Members Present

Charles S. Ryan, MD (Chairman)	Sun Company
Ned K. Walters (Vice Chairman)	E. I. du Pont de Nemours & Company
John Dougherty, MD	Celanese Corporation
Albert E. Greene	Air Products & Chemicals Inc.
C. Luckey Heath	Stauffer Chemical Company
Harry L. Hunter	Exxon Chemical Americas
Richard A. Lippin, MD	ARCO Chemical Company
Patrick McNulty	Rohm and Haas Company
Paul O. Nees	Occidental Chemical Corporation
Ronald Van Mynen	Union Carbide Corporation
John R. Wheeler	The Standard Oil Company (Indiana)

Members Absent

Warren Ferguson	Allied Corporation
Claude M. Irwin	Phillips Chemical Company
Charles L. Richards	Gulf Oil Chemicals Company
Allan E. Sherr	American Cyanamid Company

Guests

Robert Brant	ICI Americas Inc.
Jackson Browning	Union Carbide Corporation
Becky Rose	Occupational Safety and Health Administration

CMA Staff

Rita Comotto (part-time)
Milton Freifeld
Tim O'Leary (part-time)
Jacqueline Simmons

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ACTION ITEMS

- The Work Group on Reproductive Hazards will present a symposium for CMA members dealing with problems related to reproductive hazards. An advance notice of the program with a response form will be sent to members so that we can estimate the expected attendance.
- The Work Group on OSHA Carcinogen Policy will prepare comments on a preliminary version of the final rule if it becomes available.
- The Hearing Conservation Work Group will analyze the final hearing conservation rule, which is now at OMB. Educational material explaining the rule to CMA members will also be prepared by the work group.
- The Respirators Work Group will continue its program to obtain data showing respirator effectiveness. It will also continue to develop responses to regulatory initiatives as it did recently to the OSHA ANPR.
- The Future Issues and Health Standards Task Groups will continue to monitor legislative progress of the Miller bill (H.R. 5735).
- The latest draft of our Model Balanced Performance Standard which is on Hazardous Materials (Subpart H) will be presented to the Agency by members of the Safety Standards Task Group.
- The Safety Standards Task Group will prepare comments on an advanced draft on Walking/ Working Surfaces (Subparts D and I of 29 CFR 1910) in cooperation with Organization Resources Counselors.
- The Safety Statistics Task Group will complete its review of Occupational Injury and Illness Guidelines and publish them by the end of this year.
- Questions dealing with interpretation of OSHA rules for reporting injuries and illnesses and the revised OIIR Guidelines will be discussed with Agency personnel.
- The OSHA Reform Task Group will suggest specific language for modifying the OSH Act.
- Dr. Ryan and Mr. Freifeld will draft a letter to the International Agency for Research on Cancer (IARC) in an attempt to ease the current strained relations between CMA and IARC.

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CMA 060641

The meeting was convened at 9:15 AM.

1. Minutes of Meeting and Retreat May 24-26, 1982

The minutes were approved as distributed with a correction in Item 7 to indicate that Dr. Lippin's assignment was to explore the subject of neurotoxicity and not informing family physicians about industrial medicine.

2; Coordination with RISC

Jackson Browning described how the Regulatory Impact Special Committee is organized and functions. He offered RISC's assistance to OSHC, as needed, in preparing cost/risk/benefit analysis in the health and safety area.

3. Legislative Review

Mr. Nolde reviewed the provision of the Miller bill (H. R. 5735) on occupational disease compensation. He said legislative action on this bill was not likely this year, although a "lame duck" session after the election carries with it an element of unpredictability. Mr. Miller is expected to mount a major campaign for enactment next year. This will require close monitoring in view of recent congressional action on other environmental and safety matters which were adverse to the chemical industry.

4. Task Group Reports

4.1 Safety Standards

The Committee approved, with some modifications, the draft model standard on hazardous materials (Subpart H) for presentation to OSHA.

The task group will prepare comments on an advance draft of OSHA's proposal on Walking/Working Surfaces, following the lead of Organization Resource Counselors.

CMA comments of September 10, 1982, on Advisory Standards (47 FR 23477, May 28, 1982), were distributed. We recommended that only hazards likely to cause death or serious harm to employees should be retained. In those cases "shall" should be substituted for "should".

4.2 Health Standards

Chemical industry representatives will participate in an OSHA Conference on Health Inspection Targeting on October 6-8, 1982.

CMA's response to OSHA's ANPR was submitted on September 13, 1982. A research program to determine the efficacy of respira-

tors has been initiated. The Work Group on OSHA Carcinogen Policy will prepare comments on a preliminary version of that rule when it becomes available.

The final rule on the Hearing Conservation Amendment to the Noise Regulation is expected to be complex. The Noise Work Group will consider a symposium to interpret and discuss it with CMA members.

The Committee approved with suggested changes, a program for a symposium planned by the Reproductive Hazards Work Group.

Messrs. Eschenbach, Danchuk, and Dougherty will testify for CMA at the Hearing on Access to Employee Records on October 8, 1982. They will highlight comments that CMA submitted on September 14, 1982.

4.3 Hazards Communications

The Committee referred the group's draft charter back to the task group with some suggested changes.

The task group is developing post hearing comments on OSHA's proposed Hazards Communications Standard.

4.4 ANSI Z129.1 Revision

The completed packet of required materials has been sent to ANSI's Board of Standards Review. Approval of the revision is expected soon despite a negative vote which remains unresolved from the International Chemical Workers Union.

4.5 State Activities

This task group was formerly under the Hazards Communications Special Committee. The Committee approved the following charter for this group:

Review enacted and proposed state and local legislation and regulation in the health and safety areas. Together with other appropriate OSHC task groups, identify and prioritize component elements of such legislation and regulation and recommend alternative language.

Provide technical assistance to the States Activities Special Committee task groups for interaction with state and municipal governments through established Chemical Industry Councils (CICs), business groups, CMA member companies and other interested parties.

Provide technical support through the Occupational Safety and Health Committee to all CMA committees and program areas in the development of policy on key state and local issues.

The Committee also approved for release a short description of "Chemical Information for the Community".

The National Fire Protection Association (NFPA) plans to prepare and distribute information about the fire hazards of chemicals. The Committee recommended that the task group contact NFPA's staff to offer our help. In addition, member companies should be advised of this project and encouraged to participate.

4.6 Safety Statistics

The Committee agreed that the task group should discuss with OSHA our draft revised guidelines for Occupational Injury and Illness Reporting, as well as related questions.

Off-the-job statistics were dropped from our quarterly OIIR this year. This will be resumed in 1983.

4.7 Worker Education

Responses to the questionnaire on worker education are being tabulated. Results will be distributed soon to members. In addition, a report, which will include findings gleaned from questionnaire responses is targeted for the end of this year. A symposium to discuss worker education is planned for next year.

4.8 Process Safety Analysis

The task group continues to obtain information by telephone on company practices regarding methods for the analysis of process safety.

4.9 Future Issues

The task group identified ten issues to which it has assigned priorities based on the likelihood of government action and impact on the industry. Reports on each issue including recommendations and rationales for them, will be submitted to the Committee.

6. Guest Speaker -- Becky Rose (OSHA)

Ms. Rose described the Agency's new regulatory management methods and its program for standards development.

7. CMA Representatives at International Agency for Research on Cancer

The Committee agreed that Dr. Ryan, Mr. Freifeld, and former CMA representatives at IARC meetings should draft a letter to IARC in an effort to improve our relations with that Agency.

8. Neurotoxins

Dr. Lippin reported there is much interest in medical research in this area, including both the behavioral and pathological approaches. The question of what the Committee should do about continuing to monitor this field was referred to the Future Issues Task Group.

9. Next Meeting

The next meeting was scheduled for the afternoon of November 16 and the morning of November 17, 1982.

The meeting was adjourned at 4:00 PM.



Milton Freifeld
Associate Director
Safety, Health and Chemical
Regulations

Minutes Subject to Approval
10/28/82

MF:bal

cc: J. A. Simmons
R.. P.. Schumacher