

MANAGER'S GUIDE TO HEALTH STANDARDS DEVELOPMENT

SUMMARY

The vinyl chloride story illustrates the impact that the Occupational Health and Safety Act can have on the chemical industry. Less dramatic, but just as significant, are the obligations that the health standards now under development will bring. Most of the materials we buy, process, produce and distribute will have additional requirements for monitoring, recordkeeping and medical surveillance. Some of the new standards will require effort and expense to achieve compliance.

Managers of manufacturing facilities, laboratory installations and distribution activities, as well as the commercial departments they serve, will have increased responsibilities under the evolving standards and can benefit from a knowledge of the timetable for the standards establishment.

The C&P Biosafety Operations people are working with OSHA and NIOSH to monitor the regulatory actions and to coordinate the constructive input that business areas are making to the agencies to moderate the requirements of specific standards. Active in this relationship with the agencies are both the Law and Medical Departments.

OSHA's GOALS FOR STANDARDS

One mandate that OSHA has is to establish 400 standards for the more familiar industrial chemicals as soon as possible. This is called their "Standards Completion Program". Rather than conducting 400 studies to determine appropriate exposure levels, OSHA has adopted enmass the TLV's long established as consensus standards by the American Congress of Governmental Industrial Hygienists. Along with these unchanged TLV's they have introduced the "action level" as one-half the TLV. At concentrations below that point only minimal monitoring, recordkeeping and medical surveillance are required. Starting at the action level, and approaching the TLV, very significant burdens are added in these several activities. For practical purposes it becomes necessary to achieve one-half the TLV for most materials to reach a manageable work load for the monitoring and medical surveillance functions.

Concurrently with the "Standards Completion Program" OSHA has other standards under development for a much smaller list of materials that are significantly toxic or unusually widespread throughout the workplaces of the nation. NIOSH, the scientific advisory body for OSHA, recommends these standards in the form of "Criteria Documents". OSHA accepts or rejects the NIOSH recommendations in whole or in part in a

series of deliberations charted in their systems management as "milestones". All interested parties have opportunities along the long path to a completed health standard to comment on or appeal the proposals. Business groups involved with the chemicals that are proceeding along the line of criteria-document approach to standards have an obligation to evaluate the technology and economic impact involved in those specific standards. The Biosafety Staff will coordinate, advise and review the inputs to NIOSH and OSHA to serve the business areas.

The attached information includes a "Flowchart for Development of OSHA Health Standards" by G. F. Johnson. It illustrates the tenuous paths that characterize (1) the Criteria Document route, (2) the Standards Completion route, and contrasts these with (3) the Imminent Hazards route.

A current status chart for emerging health standards has been constructed by Dr. Johnson for the separate categories, "Standards Completion Program" and "Criteria Document Route". When significant changes on this chart occur, the summary will be updated and reissued.

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Attachments

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