

To: Semmler, Klaus K DSC-CHSE-KS
<klaus.semmler@shell.com>; Teague-Lixey, Holly E
SCC-HSE <holly.teague-lixey@shell.com>; English, Timothy
A SCC <timothy.english@shell.com>
From: Clegg, Patsy M SCC-CHSE-PC
</O=SHELL/OU=MSXSCC/CN=RECIPIENTS/CN=PH197432>
Cc: Williams, Elizabeth J SCCA-HSE
<elizabeth.williams@shell.com>; Brooks, URL -
<CB811505@MSXSOC.SHELL.COM>; Cagen, Stuart
<SC724012@MSXSCC.SHELL.COM>; Clarke-Sturman, Tony
<Tony.A.Clarke-Sturman@OPC.shell.com>; Clegg, Patsy
<PH197432@MSXSCC.SHELL.COM>; De Jong, Geert
<Geert.G.deJong@SI.shell.com>; English, Timothy
<taenglish@Shell.Com>; Granville, Geoffrey
<Geoffrey.Granville@shell.ca>; Ransdell, Jerry
<jdransdell@Shell.Com>; Semmler, Klaus
<klaus.semmler@shell.com>; Steup, David
<DRSteup@equiva.com>; Tsai, Shan <sptsai@Shell.Com>;
Veenstra, Gauke <Gauke.E.Veenstra@OPC.shell.com>;
Waskowiak, Dave <Dave.Waskowiak@shell.com>; Weidel,
Rick <R.Weidel@shell.com>
Bcc:
Received Date: 2004-05-24 13:15:35 GMT
Subject: FW: Benzene Medical Surveillance program - Review of
Meeting Summary

Tim, Klaus, Holly,

I am forwarding this email to you as a way to keep you informed on the review of the US OSHA Benzene Medical Surveillance program. As a result of the study that Shan Tsai did to review the data from DP and Norco (report attached - to be published soon in a journal), we identified an opportunity to look at Shell's implementation program. As product steward, I am following the discussions but relying on industrial hygiene and medical to resolve any changes. Klaus and Holly, I will leave it up to you to inform the Lower Olefins business. Oil Products is already represented on the team.



benzene study
paper Reg Tox Ph...

R gards,
Patsy

Patsy Clegg
Product Steward
Shell Chemical LP
One Shell Plaza, 910 Louisiana, Houston, TX 77002-4916

Tel: +1 713 241 2521 **Fax:** 3325
Email: patsy.clegg@shell.com
Internet: <http://www.shell.com/chemicals>

-----Original Message-----

From: Clegg, Patsy M SCC-CHSE-PC
Sent: Monday, May 24, 2004 8:02 AM
To: Donnelly, Robin SHLOIL-SHLOIL-HE; Ransdell, Jerry D SCC-HSE-OE; Tsai, Shan SP SHLOIL-SHLOIL-HE; Karr, Matthew P SOPUS; Leung, Janet SCC
Cc: Snyder, Phil J SCC-HSE-OE
Subject: RE: Benzene Medical Surveillance program - Review of Meeting Summary

I will leave the decision making to the experts, however, I request that I continue to be copied on correspondence so that I can keep the aromatics & lower olefins PBUs informed.

Regards,
Patsy

Patsy Clegg
Product Steward
Shell Chemical LP
One Shell Plaza, 910 Louisiana, Houston, TX 77002-4916

Tel: +1 713 241 2521 **Fax:** 3325
Email: patsy.clegg@shell.com
Internet: <http://www.shell.com/chemicals>

-----Original Message-----

From: Donnelly, Robin SHLOIL-SHLOIL-HE
Sent: Wednesday, May 12, 2004 7:59 AM
To: Ransdell, Jerry D SCC-HSE-OE; Clegg, Patsy M SCC-CHSE-PC; Tsai, Shan SP SHLOIL-SHLOIL-HE; Karr, Matthew P SOPUS; Leung, Janet SCC
Cc: Snyder, Phil J SCC-HSE-OE
Subject: RE: Benzene Medical Surveillance program - Review of Meeting Summary

All

I have the benefit of looking at this with fresh eyes which may give me a different perspective.

- We know from the recent studies that we do not have a problem with leukemia in our employees
- We know our exposure to benzene is well controlled (although more personal exposure data would be useful)
- We know that CBCs have no predictive value at the levels of exposure we see
- We know we spend about \$500M on this annually

My conclusion is that the program needs to be redesigned and this is a much more urgent than assuring compliance with an out of date program. I actually think our current program potentially creates rather than reduces liability.

I support action 2 which I will take - I would delete action 1

I believe we can do this in a smart, transitional way which will allow us to retain our health tracking capability and work constructively with our unions but at the same time get us away from a program which is frankly out of date and no longer appropriate

Rob Donnelly
Corporate Health Director, Shell Oil Company

SHELL-MCCLURG-064213

Shell Health Services - USA
One Shell Plaza 1002, PO Box 2464 Houston TX 77252-2463

tel +1 713-241-6350 Fax 5875

mailto:robin.donnelly@shell.com

This e-mail may: (1) be subject to the Attorney-Client privilege, (2) contain CONFIDENTIAL MEDICAL INFORMATION, or (3) be strictly confidential. If you receive it in error, you are on notice of its status. Please notify us immediately by reply e-mail and then delete this message from your computer system. Please do not copy it or use it for any purpose, or disclose its contents to any person; to do so could be a breach of confidence. Thank you for your cooperation.

-----Original Message-----

From: Ransdell, Jerry D SCC-HSE-OE
Sent: Tuesday, May 11, 2004 7:49 PM
To: Clegg, Patsy M SCC-CHSE-PC; Tsai, Shan SP SHLOIL-SHLOIL-HE; Karr, Matthew P SOPUS; Leung, Janet SCC
Cc: Snyder, Phil J SCC-HSE-OE; Donnelly, Robin SHLOIL-SHLOIL-HE
Subject: Benzene Medical Surveillance program - Review of Meeting Summary

This note is to summarize the discussion regarding future capability for epidemiological study of the Benzene Medical Surveillance program (BMSP) in US manufacturing sites. For those copied, please note the conclusions/recommended actions, and please advise if you do not agree.

Participants:
Patsy Clegg
Matt Karr
Janet Leung
Jerry Ransdell
Shan Tsai

Date: 8 April 2004

Background: Benzene medical surveillance program was initiated in the 1970's and then modified to be in compliance with the OSHA 1987 Benzene Standard. Epidemiological studies of the Benzene Medical Surveillance program were done first in 1990 and then again in 2004 to evaluate the medical data for possible benzene-related effects. There were no benzene-related health effects found in either study.

In the current administration of the Benzene Medical Surveillance program:

- (1) sites review exposure data and identify jobs/employees that are eligible for BMSP per the OSHA Benzene Standard medical surveillance criteria
- (2) There appears to be variation between sites on how the eligibility criteria is applied
- (3) Once employees are eligible and participate in the BMSP, they remain in the program regardless of job changes and further benzene exposure (this exceeds OSHA requirements)
- (4) The number of eligible jobs/employees is gradually reducing as the exposure levels decrease below the OSHA medical surveillance criteria
- (5) Some employees choose not to participate in the testing, but the level of effort to promote conformance to the requirements is not clear.

Issue: The gradual reduction of eligible employees for BMSP could limit future epidemiology capability

SHELL-MCCLURG-064214

Discussion: Significant information has been achieved by the recent and previous studies of the BMSP. Since there have been no positive findings of benzene-related health effects and exposures are not expected to increase and may actually decrease further, there is no clear benefit at this time for future epidemiology of the BMSP.

Conclusion: There was general agreement that the BMSP should not be changed at this time but should continue to be administered in accordance with the OSHA benzene Standard. This decision can be revisited as results become available from ongoing research (e.g. Shanghai Study). The practice of "Once in Always In" exceeds OSHA requirements. Employees not currently exposed to benzene are remaining in the program indefinitely. However, It was not clear to those in this meeting whether continuing the medical surveillance for those no longer exposed was effective for early warning of leukemia and therefore a medical review of this practice was considered appropriate.

Recommended Actions:

- (1) The Benzene medical surveillance criteria should be reviewed with sites to promote consistent implementation with documented declination where the eligible employee elects not to participate
- (2) Shell Health Services (Rob Donnelly) would review the current BMSP and recommend appropriate actions regarding an exit criteria for employees are no longer exposed to benzene.

Jerry Ransdell
Senior Staff Industrial Hygienist
Shell Chemical LP
Health, Safety and Environment Department, P.O. Box 4320, Houston, TX 77210-4320

Tel: +1 713 241 6532

Email:

Internet: <http://www.shell.com/chemicals>

Attachments:

benzene study paper Reg Tox Pharm1.ZIP