



INTERNAL CORRESPONDENCE

MINING AND METALS DIVISION

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To (Name) K. S. Lane, MD
Division 22nd Floor
Location New York, NY

Date July 16, 1981

Originating Dept.

Answering letter date

Copy to R. J. Kronkhyte
R. O. Marsten
H. B. Rhodes
W. C. Thurber
G. L. Vessels
D. Hyde, MD

Subject Revised Medical Exam Requirements -
CAL/OSHA

Attached is a copy of the Medical Surveillance section of CAL-OSHA's asbestos regulations, as revised on 3/21/81. These revisions have not been approved by Federal OSHA, but apparently would be enforced by CAL-OSHA wherever appropriate. The revisions include:

1. Reduction from 1.0 f/cc to 0.1 f/cc exposure level to trigger the exams.
2. Different requirements depending on age and time since first exposure.
3. An additional X-ray.
4. Addition of rectal examination and stool guaiac test.
5. Requirement for physician's opinion on whether or not employee should continue to work with asbestos.

As you probably remember, the proposed revisions also included sputum cytology; but, this was dropped from consideration at the Standards Board hearing which I attended.

Through some unexplained oversight, plant personnel have not been aware of the revisions in the CAL-OSHA Medical Surveillance requirements, although I do not consider this a "health" problem since our exposure levels are relatively low. However, we could be cited for non-compliance, and we should base a new program on the new rules as a minimum.

Bob Kronkhyte and I met with Dr. Hyde on 7/15/81 to discuss the revisions and initiate an implementation program, which I would like to have in effect before the end of the year. Most of our employees fit the "over 40 and over 10 years exposure" category, and we may have problems with acceptance of Item No. 4 above. Dr. Hyde uses a "Hemoccult" Kit by Smithkline Diagnostics for his stool examinations. He is willing to demonstrate the use of the kit on video tape and to conduct educational seminars on the revised standards for all personnel.

I would appreciate comments from you and/or Dr. Rhodes on the attachment and the contents of this letter at your earliest convenience.

John L. Myers
John L. Myers

att:

/dm

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CAL-OSHA GENERAL INDUSTRY SAFETY ORDERS - TITLE 8
(3/21/81)

Article 5208 Asbestos

(j) Medical Surveillance

(i) Medical Examinations. The employer shall provide or make available at no cost to the employee a comprehensive medical examination by a licensed physician in accordance with this subsection for each employee engaged in an occupation where exposure to airborne asbestos, without regard to the use of respiratory protective equipment, has been determined to exceed, or may be reasonably expected to exceed an 8-hour time-weighted average concentration of 0.1 fiber, longer than 5 micrometers, per cubic centimeter.

(A) The examination shall be conducted within 30 calendar days of the employee's initial assignment, thereafter as required by Section 5208 (j)(1)(B)1 or (j)(1)(B)2 and within 30 calendar days of termination of employment if an examination has not been performed within the year preceding termination.

(B) The examination shall include, as a minimum, a history to elicit symptomatology of upper and lower respiratory and gastrointestinal diseases, a physical examination of the respiratory and gastrointestinal systems, a 14-inch by 17-inch posterior-anterior chest X-ray, right and left anterior oblique chest X-rays, pulmonary function tests including forced vital capacity (FVC) and forced expiratory volume at one second (FEV₁).

(1) For employees less than 40 years of age with less than 10 years since initial occupational exposure to asbestos, the medical examination shall be provided every three years after the initial examination and shall include as a minimum a 14-inch by 17-inch posterior-anterior chest X-ray, a physical examination of the respiratory and gastrointestinal systems, and pulmonary function tests including forced vital capacity (FVC) and forced expiratory volume at one second (FEV₁).

2. For employees 40 years of age or older or with 10 years or more since initial occupational exposure to asbestos, the medical examination, as described in Section 5208 (j)(1)(B), shall be performed annually, except that the oblique X-rays need only be performed every three years. A rectal examination and a stool guaiac test for occult blood shall be performed annually.

(C) The employer shall obtain from the examining physician all the information required by this subsection and any other medical information or diagnosis relevant to occupational exposure to asbestos including the physician's opinion as to whether the employee has any detected medical condition which would place the employee at increased risk of material impairment of the employee's health from exposure to asbestos.

(2) Recordkeeping.

(A) Complete and accurate records of medical examinations required by this section shall be maintained for each employee.

(B) Medical examination records shall be maintained for at least 30 years.

(C) Records of the medical examinations required by this section shall be provided upon request to employees, designated representatives, and authorized representatives of the Chief of the Division of Occupational Safety and Health in accordance with Section 3204. Medical records shall also be provided upon the request of the Director, National Institute of Occupational Safety and Health.

(D) The employer shall comply with the provisions of Section 3204 concerning the transfer or disposition of medical records.

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