

02-WRR-145

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DATE: MARCH 31, 1987

FROM: PHIL SNYDER, SR. INDUSTRIAL HYGIENIST, HEALTH & SAFETY
- MANUFACTURING AND TECHNICAL

TO: GARY VAN GELDER

SUBJECT: EFFECT OF EXTENDED WORKSHIFTS ON PELS

Per our earlier conversation on this matter, your comments on the attached request from Wilmington would be appreciated. Like many locations, they are now on a 12 hour workshift and are concerned that they aren't handling the computation of allowable exposure properly. With regard to this matter, the following thoughts are offered.

Generally: Attachment 2 is from the OSHA technical field manual and addresses the possible adjustment of permissible exposure limits where a workshift exceeds eight hours. The local OSHA regional office when contacted, advised that the only time they have ever made such an adjustment, is for inorganic lead. This specific health standard apparently provides for such a calculation (attachment 3). While this reflects only this regions views, it is not incompatible with the review of case law which turned up no specific contested cases on point. OSHA further indicated that their typical approach is to monitor for the full time and pick the eight hours with the highest exposure.

In conclusion, OSHA may adjust an permissible exposure limit in situations where it is specifically provided for by statute or is based on overwhelming toxicity data. This would appear however to be the exception to the rule.

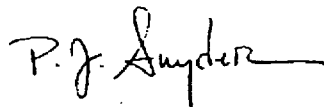
With regard to the materials listed by Wilmington:

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H.S. & S. SNYDER
10/11/87

ABS-04671:

Coke dust: I presume that the nuisance dust limit of 5 mg/m³ would be used.

Except for the above materials are not Shell products. I would appreciate your thoughts on this issue as it relates to the Wilmington question. Please advise if you feel a rigorous analysis will be involved. Thanks.



Phil Snyder