

CHEMICAL MANUFACTURERS ASSOCIATION
OCCUPATIONAL SAFETY AND HEALTH COMMITTEE
Minutes of Meeting

Sheraton Fredericksburg Inn and
Conference Center
Fredericksburg, VA

Business Meeting, May 21, 1984
1:00 p.m. - 5:00 p.m.

Planning Meeting, May 21, 1984
8:00 p.m. - 10:00 p.m.

May 22, 1984
8:30 a.m. - 12:30 p.m.

May 23, 1984
8:30 a.m. - 11:05 a.m.

Attendees

Harry Eschenbach
(chairman)
Gary Sunshine
(vice chairman)
John Dougherty, MD
Thomas Evans
Luckey Heath
Claude Irwin
Richard Lippin, MD
Paul Nees
John G. Page, Jr.
Charles Ryan, MD

Company

W.R. Grace & Company
ICI Americas Inc.
Celanese Corporation
Monsanto Company
Stauffer Chemical Company
Phillips Chemical Company
ARCO Chemical Company
Occidental Chemical Company
E.I. du Pont de Nemours & Company
Sun Company Inc.

Guests

Claire Baughman
William Fishbeck, MD
John Fossett
Gary LeClercq, MD
Ronald Van Mynen
(5/22 and 5/23 only)

Ciba-Geigy Corporation
Dow Chemical Company
Velsicol Chemical Company
Exxon Chemical Americas
Union Carbide Corporation

Absent

James K. Filan, MD
Brad Garber
James Norwood
Charles Richards
Allan Sherr

The Procter & Gamble Company
Olin Corporation
Air Products & Chemicals Inc.
Gulf Oil Products Company
American Cyanamid Company

CMA Staff

Milton Freifeld
Claire Boccella
Robin Hertz
Chris Nolde (5/21 and 5/22 only)
Randal Schumacher (5/21 - evening only, 5/22, 5/23)

Action

- 84/7 Consider how to use information from the ASPER critique.
Fishbeck/LeClercq
- 84/11 The Safety Standards Task Group will draft comments on preliminary OSHA proposals on ladders and scaffolds and on the final standard on advisory standards.
Garber
- 84/13 The Safety Standards Task Group will try to block a proposal in NFPA 30 on flammable liquids storage which would make requirements of all the options for automatic shut-off or diversion of the stream to prevent tank overflow.
Garber
- 84/15 P. Nees, working with the Health Standards Task Group, will develop a CMA position paper on NTP activities dealing with translation of animal data to man.
- 84/16 The Future Issues Task Group will rewrite the draft CMA position on cytogenetic screening.

The meeting was convened at 1:00 p.m., May 21, 1984.

1. Minutes of Last Meeting, March 15, 1984

These were approved as distributed.

2. OSHA/EPA Overlap

T. Evans discussed activities of EPA and OSHA regarding workplace health risks.

The Committee unanimously approved the "Policy Guidelines for CMA Committee and Program Panels on the Roles of EPA and OSHA in the Assessment and Management of Health Risks in the Workplace", dated April 18, 1984.

3. Task Group Reports

3.1 Communication and Education

This group is prepared to present their modified symposium program in Philadelphia, June 14.

The Committee directed this group to start a work group on real vs. perceived hazards.

3.2 Future Issues

The Committee asked this task group to rewrite the draft CMA position on cytogenetic screening. It should be a freestanding document rather than rely on quotes from another association.

The task group has started planning for a symposium on real vs. perceived hazards, but will turn the project over to the Communication and Education Task Group and may continue to have input.

C. Irwin distributed a summary of statements projecting trends in society, generally, and the chemical industry, in particular, over the next few years. It will be discussed at the next task group meeting. Suggestions for additions or modifications were solicited.

3.3 Health Standards

J. Dougherty reported that the Westat and Hull reports had been reviewed by the task group and final versions of them were being written by the contractors. Dr. Selikoff's portion, due last March, has not been started yet but was promised repeatedly.

The Argus Research Laboratory's report on single- and multi-generation reproductive studies is under review by the task group.

The Reproductive Hazards Work Group is also exploring a possible CMA role in how registries should be set up to monitor reproductive outcomes. The work group is also reviewing Section 624: Reproductive and Fetal Hazards of the Equal Employment Opportunity Commission Compliance Manual, to determine whether to recommend changes.

3.3 Health Standards (contd.)

Since Title II, dealing with a central science board, has been dropped from the Ritter/Martin Bill (HR 4192), the work group charged with developing a position on it has been sunset.

The task group is also preparing a CMA response to generic issues in the OSHA proposal on asbestos (49 FR 14116).

The Committee directed the Health Standards Task Group to start a work group, headed by R. Lippin, on neurobehavioral effects.

The task group will identify issues the Committee will be expected to comment on in the near future and promote studies to develop data supporting positions it may recommend. In consultation with others, J. Dougherty will prepare the task group's work plan for the year ahead.

3.4 Process Safety Analysis

This group continues to revise its draft report, said J. Page.

3.5 Right to Know

C. Boccella reported that positions of the states and unions involved are now known in the litigation in the Third Circuit Court of Appeals on the OSHA Hazard Communication Rule. The CMA brief as intervenor siding with OSHA, is due July 30.

C. Nolde discussed House Joint Resolution 514, supporting worker's "right to know" about exposure to substances which are hazardous to their health, introduced by Representative Bruce Vento (D-Minn.). Hearings on this non-binding sense of the Congress resolution are expected soon in the Health and Safety Subcommittee of the Education and Labor Committee.

The State Activities Work Group prepared tables comparing the requirements of state right to know laws with the OSHA Hazard Communication standard. The Committee recommended changes in the cover letter to better explain the symbols used in the tables. Assuming these changes would be made, the Committee unanimously approved sending the letter and tables to CMA OSH contacts.

3.5 Right to Know (contd.)

The Community Activities Work Group will develop specific plans for helping local groups implement the "Tentative Local Guides" previously approved by the Committee.

3.6 Safety Standards

This task group is preparing comments on the performance language and confined spaces issues in the OSHA proposed standard for grain handling facilities (49 FR 996) and the OSHA proposed standard for General Environmental Controls: Accident Prevention Tags (49 FR 17541).

CMA comments on OSHA's second draft of a proposed standard on confined space entry (29 CFR 1910.146) were submitted to the agency on May 9.

L. Heath reported that the Bureau of Labor Statistics (BLS) draft revision of their booklet 412 on recording workplace injuries and illnesses presented many problems from industry's view and if implemented would seriously overstate occupational injuries and illnesses. J. Page said that discussions with P. Tyson and others at OSHA indicated some of industry's concerns had been addressed in a modification of the BLS draft.

R. Hertz reported that, in a telephone poll, the Committee approved the Occupational Injury and Illness Guidelines drafted by the Safety Statistics Work Group. This completes action item 84/10.

The task group's effort to convince ASTM Committee D-26 on Halogenated Solvents to withdraw their work practice on confined spaces have been unsuccessful. While such efforts will continue action item 84/12 will be considered completed.

3.7 Planning Group

The Committee approved starting a planning group to meet between meetings of the OSH Committee. Members will include OSHC chairman and vice chairman, the advocates or their designees (e.g., task group leaders) of the Health Standards, Communication and Education, Safety Standards, and Right to Know Task Groups.

4. Liaison

R. Lippin reported that the American Occupational Medical Association (AOMA) is now tracking relevant legislative and regulatory initiatives and commenting where appropriate.

E-34 Committee on Occupational Safety and Health of the American Society for Testing and Materials (ASTM) has set up a subgroup to review its methods of operations. M. Freifeld will recommend that they avoid duplication of OSHA standards. E-34 will also start formally interacting with the International Standards Organization (ISO).

The International Affairs Group (IAG), C. Boccella said, has prepared a paper, which will be discussed at a meeting with CEFIC in June, that discusses the differences between U.S. and EEC labeling requirements, what impacts those differences have on trade, and possibilities for harmonization.

The CMA representative to the National Fire Protection Association (NFPA) annual meeting, held in the same week as the OSHC meeting, will vote to retain NFPA Code 30 on flammable liquid storage without change. This will avoid adding burdensome requirements relating to the prevention of overflow of storage tanks.

P. Nees, working with the Health Standards Task Group, will develop a CMA position paper on the National Toxicology Program's (NTP) activities. He will stress the translation of animal data to man and recommend ways of bolstering the position developed.

The Board of Directors has sunset the Special Programs Advisory Committee (SPAC), said G. Sunshine. The Board will appoint a group to help resolve administrative problems that arise in connection with the special programs. Staff members will be responsible for liaison between special committees and OSHC. M. Freifeld will coordinate, with L. Spurlock and C. Stack, OSHC review of generic issues that arise in dealing with specific chemicals.

Committee members and staff drafted a letter to member companies urging critical review of voluntary standards that overlap regulations. It is now under review by senior CMA staff. This completes action item 83/3.

J. Clary of Celanese Corporation, the CMA representative to the June 1984 meeting of the International Agency for Research on Cancer, will give an oral report to interested CMA representatives early in July. This completes action item 84/14.

5. Worker's Compensation Reform

R. Schumacher reviewed the development of a CMA policy on this subject.

J. Browning of Union Carbide Corporation has agreed to present the CMA position at an International Conference on Disability Compensation for Occupational Diseases, June 6-9, 1984, in New York City. This completes action item 84/9.

6. Budget Projects

The Committee voted, without dissent, to grant \$20,000 to Johns Hopkins University in support of a symposium the school is planning on "Issues at the Interface of Epidemiology and Health Risk Assessment".

7. Committee Assignments

<u>Group</u>	<u>Advocate</u>	<u>Chair</u>
Communication and Education	Van Mynen/Baughman	Heath
Control Technology	Norwood	Schroy
Future Issues	Irwin	Irwin
Health Standards	LeClercq/Fishbeck	Dougherty
Process Safety Analysis	Fossett	Knowlton
Right to Know	Evans	Wilkinson
Safety Standards	Garber	Page

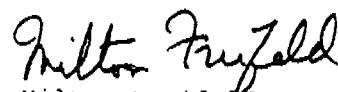
<u>Group</u>	<u>Liaison</u>
AOMA	Lippin
APHA	Hertz
ANSI	Garber
ASTM	Freifeld
IAG	Boccella
NFPA	Fossett
NIOSH	Filan/Evans
NTP	Nees
OSHA	Evans

8. Meetings Scheduled for Next Year

1984: July 10
September 13 (since changed to Sept. 11)
November 8

1985: January 10
March 21
Week of May 20

The meeting was adjourned at 11:05 a.m., May 23 1984.


Milton Freifeld
Associate Director
Health, Safety and
Chemical Regulations

Minutes Subject to Approval

MF:mw
062684

cc: H. Eschenbach
G. Sunshine
C. Boccella
R. Hertz
C. Nolde
R. Schumacher
P. Sokoloff