



John Reader

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September 30, 1982

Mr. Pat Menulty
Rohm and Haas Company
P.O. Box 584
Bristol, PA 19007

Dear Pat:

Sorry for the delay. Enclosed is the second draft of the preamble. I think I have included most of the suggestions from our last meeting. Please feel free to make further changes, editorial or otherwise.

Sincerely,

Thomas G. Grumbles, Director
Industrial Hygiene

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Enclosure

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DRAFT PREAMBLE

THE CHEMICAL INDUSTRY IS NO NEWCOMER TO EMPLOYEE TRAINING. EXAMPLES OF THE INDUSTRIES CONCERN FOR EMPLOYEE TRAINING CAN BE FOUND DATING BACK TO THE TURN OF THE CENTURY. THIS TRAINING COMMITMENT IS BASED ON THE SIMPLE FACT THAT PROTECTION OF WORKER HEALTH AND SAFETY IS THE RIGHT THING TO DO. IT'S GOOD BUSINESS. NEVER BEFORE HAS THE NEED FOR TRAINING OF OCCUPATIONAL POPULATIONS IN THE SAFETY AND HEALTH ASPECTS OF THEIR JOBS AND WORKPLACE HAZARDS BEEN MORE EVIDENT. THE WORKING POPULATION HAS CHANGED IN CHARACTER, BECOMING MORE INDEPENDENT. THUS IT IS INCREASINGLY NECESSARY TO TELL WORKERS "WHY IT MUST BE DONE THIS WAY" RATHER THAN "DO IT THIS WAY BECAUSE I'M THE BOSS". AS WE RAPIDLY LEARN MORE INFORMATION ON THE HEALTH HAZARDS OF CHEMICALS THE AMOUNT AND COMPLEXITY OF INFORMATION TO BE CONVEYED TO EMPLOYEES IS INCREASING. KNOWLEDGE AND USE OF NEW TRAINING TECHNIQUES AND MEDIA AND HOW TO MEASURE THE EFFECTIVENESS OF THESE PROGRAMS HAS ALLOWED FOR IMPROVEMENT AND INCREASED EMPLOYEE ACCEPTANCE OF THE TRAINING PRESENTED. TRAINING AND EDUCATION HAVE EXPANDED UNDER OSHA FROM INTERPRETING THE GENERAL DUTY CLAUSE REQUIREMENT TO INFORM EMPLOYEES OF WORKPLACE HAZARDS TO VERY SPECIFIC TRAINING REQUIREMENTS AS SEEN IN THE VINYL CHLORIDE AND LEAD STANDARDS. OTHER FEDERAL AGENCIES AND ACTS (DOT, RCRA, TSCA) NOW INCLUDE EDUCATION TRAINING REQUIREMENTS.

MANAGEMENT OFTEN CHALLENGES THE DIRECT COSTS OF WORKER EDUCATION VERSUS THE BENEFITS. HOWEVER, THE BENEFITS OF EFFECTIVE WORKER EDUCATION, DIRECT AND INDIRECT, ARE NUMEROUS. WITH AN