

DOW



GUIDELINES FOR THE
ESTABLISHMENT OF
OCCUPATIONAL HEALTH TEAMS
FOR DOW OPERATIONS

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INTRODUCTION

The protection of employee health and safety in the workplace is a core value of The Dow Chemical Company. Occupational health and safety is the direct responsibility of management as well as a responsibility of each Dow employee. "Occupational Health Teams" provide a more effective occupational health service through the coordination of key multidisciplinary resources with responsibilities for providing a healthy and safe work environment.

SCOPE

Industrial Hygiene and Occupational Medicine have a functional responsibility to provide the necessary professional and technical resources needed to meet the objectives of the Occupational Health Policy of The Dow Chemical Company.

A coordinated team effort between Industrial Hygiene and Occupational Medicine, line supervision, and other relevant disciplines is needed to assure an ongoing, focused, multidisciplinary evaluation of employee health within each operating unit. Such teams should facilitate continuous improvement initiatives related to workplace health. Their product should be a balanced, prioritized, documented program that is responsive to both planned program initiatives and issues that arise.

Occupational health teams should be established as appropriate, based on the size and scope of Dow operations. The highest priority for Occupational Health Teams should be given to those for manufacturing and R&D operations. A larger site with several health professionals would likely have a number of teams for specific unit operations. A smaller site with just a few plants and limited resources may want to consolidate their site and plant program activities. Consideration may be given to making use of existing teams or committees, and utilizing processes such as the consolidated audit, to accomplish the intent of this guideline.

THE OCCUPATIONAL HEALTH TEAM COMPOSITION

Members should be chosen from competent Dow personnel most familiar with the operations, such as:

1. Supervision or the operations/laboratory management representative;
2. An industrial hygiene representative (industrial hygienist and/or industrial hygiene contact);
3. An occupational medicine representative (physician or nurse);
4. Other representatives based on the issue and/or initiative as well as the needs of the particular facility (e.g., safety, environmental, toxicology, epidemiology.)

MANAGEMENT EXPECTATIONS FOR THE TEAM

1. Identify and assure that key occupational health program elements and operating disciplines are in place and working effectively.
2. Review health related data being collected to help protect employee health and safety and to support regulatory compliance.
3. Periodically, review personal exposure and physical stressor (e.g., noise) evaluations with the health examination results of employees:
 - a) For employees as groups such as the entire plant, (plant health team reports) job groups, or special groups selected by a study protocol as in the case of a specified epidemiology study.
 - b) For unique events or incidents involving individual employees.
4. Communicate with management and employees regarding health and other related issues.

5. Review occupational health processes used to determine:
 - a) Appropriateness of the medical surveillance requirements including any biological monitoring.
 - b) Appropriateness of monitoring and exposure assessment strategy.
 - c) Work restrictions for specific employees or work areas.
 - d) Physical capacities to perform essential job requirements.
 - e) Effectiveness of occupational health inputs to workplace modifications.
6. Respond in a timely manner to new findings (e.g., adverse health experience in a unit) or emerging issues (e.g., new toxicology findings) which may impact health in the area covered by the health team. Also assess the impact of proposed and new health regulations on the workplace.
7. Conduct individual employee job/health effects evaluations.
 - a) Verify the chemical(s) and the estimated exposure to compare with the health effects for acute chemical exposures.
 - b) Evaluate specific individual health complaints as they may relate to the workplace; such as skin rashes, headaches, respiratory irritations.
8. Prepare a periodic review of the occupational health program for the workplace. This may be accomplished as part of the consolidated audit of the operating unit or other appropriate auditing activity.

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