

November 1992

TN REF: AIRR, AMIS



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From: R&D Center - 401-3X9B
WIN: 236-1362
Date: November 6, 1987
Subject: 1988 NEGOTIATIONS POSITION PAPER

To: J. E. Jacoby - Gateway

cc: E. P. Massaro - Gateway (without att.)

Attached is a draft copy of the 1988 Negotiations Position Paper, "Toxic or Hazardous Substances in Westinghouse" which I have updated. Some of the attachments are dated but are still current. I did not include our asbestos guidelines with this letter but will make it available if you need it.

P. W. Bickertoff
~~P. W. Bickertoff~~, Manager
Corporate Industrial Hygiene
Environmental Affairs

/ehw



November 1992

IN RE: ABRAMS

D R A F T

(W) PROPRIETARY

1988 NEGOTIATIONS POSITION PAPER

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"TOXIC OR HAZARDOUS SUBSTANCES IN WESTINGHOUSE"

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Prepared by: C. W. Bickerstaff
Manager, Industrial Hygiene
Environmental Affairs
R&D Center

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IN RE: ARRAMS

TOXIC OR HAZARDOUS MATERIALS IN WESTINGHOUSE

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A. Historical Background

Westinghouse [(W)] was a pioneer in the field of Industrial Hygiene with the history of the department going back to the early 1930's.

The initial effort was evaluating and controlling employee exposure to silica particulate in the foundry operations. Efforts were then directed toward developing a system of evaluating the chemicals and materials used in the (W) manufacturing processes to determine the potential employee health hazards and determining what controls, precautions and protective clothing was necessary to minimize the hazards. This system was then integrated into the Westinghouse Corporate Standards Purchasing Department Specification/Material (PDS/M) Card System as a means of communicating this information to the (W) plants.

Once the hazardous materials were identified, then Safe Practice Data Sheets (SPDS) were developed, prepared and issued to the plants. SPDS included the physical properties, the common (W) materials which contained this hazardous material, the toxicity, fire information, first aid information, and how to safely handle and control the material.

Until 1970 there was limited personnel monitoring of employee exposure to hazardous materials at industrial plants including (W), with the exceptions being the monitoring of employee radiation and noise exposure. If the Headquarters Industrial Hygiene Department was involved in any monitoring that was performed, these records were well maintained. However, maintenance of such historical records at the (W) plants varies from excellent to poor. Medical surveillance, e.g. audiometric exams, periodic physicals, bioassay samples, was much more prevalent including the maintenance of such records. In 1984 Mr. Stu Saltman of the Law Department issued guidelines on records retention and by including a review of plant record retention during our plant audits, maintenance of these records has improved.

When the Occupational Safety and Health Act came into being in 1971, more emphasis was placed on employee exposure to toxic materials. Industrial Hygiene training courses were developed for the plant industrial hygiene and

safety representatives. Additional monitoring equipment, sampling pumps, noisemeters, etc., were purchased and sampling procedures were prepared for the (W) plants to perform assessment of occupational exposure. Therefore, documentation of employee exposures to toxic materials or physical agents increased such that personnel monitoring of employee exposure in the last 11 years is more than twice the amount there was in the previous 40 years.

The format of the (W) SPDS was revised to reflect the changes in the OSHA Occupational Health Standards, e.g. personnel monitoring requirements, permissible exposure limits, employee training requirements concerning the potential health hazard of toxic materials, disposal of waste and recordkeeping.

Plant audits were established to review the (W) plant Industrial Hygiene and Safety Programs with a written report then issued to the General/Plant Manager discussing the findings recommendations and requesting a response.

Because (W) was a pioneer in developing industrial hygiene and safety programs, the OSHA regulations have had a minimum impact compared to other major corporations, e.g. chemical manufacturers, and in general OSHA has a high regard for (W) as a responsive employer.

B. Present Conditions

About 60-70 percent of the (W) plants use, in part or total, the (W) PDS/M card system to purchase materials and chemicals and thus these chemicals and materials are evaluated by our department as previously described. The other plants, e.g. acquisitions or new divisions, have their own method of material evaluation including material safety data sheets from their supplier.

Each plant has copies of the (W) Safe Practice Data Sheets (SPDS) which they can use for reference and training the employees.

Specific hazardous awareness training has always been given to (W) radiation workers. Sessions covering hazardous or toxic materials and the (W) SPDS have recently been added to the safety observer training and are also included in the (W) Hazard Communications/Right-to-Know Program.

In August, 1980 OSHA issued a standard "Employee Right of Access to Medical and Exposure Records." This standard permits employees, or their designated representative, to have access to their medical records and their records of exposure to hazardous materials.

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A letter was issued by (W) Headquarters advising the plants of the details of the standard, and what steps to follow if any request was made for medical and/or exposure results (Attachment 1).

Very few plants have received employee requests for information exposure to hazardous materials and these requests were honored.

Headquarters Industrial Hygiene has always recommended that results of employee personnel monitoring be given and explained to the employees. This is especially important with the increased emphasis on monitoring employee exposure to hazardous material and all of the new OSHA occupational health standards now requiring it, e.g. asbestos, lead, arsenic and hearing conservation. If, however, during our plant audits we find that some (W) plants do not have a mechanism for informing employees of their monitoring results this is then corrected.

C. New Standards and Regulations of Concern

In 1985 the OSHA Federal Hazard Communication standard became effective for the manufacturing and chemical industries. Since then about one-half of the states have legislated employee and/or community Right-To-Know laws.

A recommended program of compliance was developed and issued to all (W) plants (manufacturing and non-manufacturing) advising them how and when to achieve specific requirements for the standard (Attachment 2). As of August 1987, only three (W) plants have received citations from OSHA on their Hazard Communication Program and these were minor infractions.

OSHA extended the hazard communication standard to include all industries effective August 1987. Fortunately most (W) facilities implemented our recommended program and this will have a minimum impact on the corporation.

With the increasing use of video display terminals (VDTs) e.g. computers, word processors, electronic mail, in the workplace, most (W) employees will have some exposure to VDTs on a routine basis. As the use of VDTs has proliferated, so has alleged health concerns associated with their use, e.g. eye strain, back strain, cataracts, skin rash and even clusters of birth defects.

The only substantiated concern is design of the workstation, i.e. ergonomics. To alleviate these concerns, Guidelines for VDTs and medical vision screen examination were developed and issued to all (W) plants (Attachments 3 and 4).

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Corporate Industrial Hygiene has developed a data system to maintain and retrieve Industrial Hygiene monitoring records for the plants, e.g. air samples, noise measurement. This system is able to track employee exposure by chemical, plant, worker occupation, dates, etc. The next module to be developed will be for occupational medical surveillance records, e.g. blood lead, audiograms. As this system is developed and used, it will aid in complying with these new regulations and will increase the access to record retention and access to employee exposure and health records in case of worker compensation claims or litigation (Attachment 5).

OSHA issued their new asbestos standards for both industry and construction in June 1986. Guidelines for developing a control program were issued to all plants in October 1986. The industry standard will have a minimum impact because asbestos in (W) products has been reduced to only a few plants, whereas the asbestos construction standard will effect most (W) facilities because it addresses asbestos insulation in buildings: fireproofing, pipe covering, sound damping, exterior siding, floor tile, etc.

Future Occupational Health Legislation of concern is the "High Risk Occupational Disease Notification and Prevention act of 1987." Representative Gaydos (D - PA) H.R. 162 and Senator Metzenbaum (D - OH) S. 79 are the authors. The House bill was recently passed and the Senate bill will probably be passed in early 1988. This legislation would require the government and participating employees to identify, notify and counsel past and present employees whom the government determines are at risk of occupational disease from exposure to hazardous chemicals or agents. Some of the major points of these bills in current form are:

- o Establishment of a Risk Assessment Board which will identify those populations at risk of disease associated with occupational health hazards.
- o The board will then notify employees and employer of that risk.
- o The notification will identify the associated disease(s), latency periods (time of exposure to time of disease), appropriate medical monitoring, the nearest certified health center and the employer's health monitoring responsibilities.

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D. Trends in the Unions

Recently there has been an increase in the number of new OSHA occupational health standards. However, there has been a decline in the number of OSHA inspections under the Reagan administration, which has been also true at (W) plants, therefore the unions are starting to become more aggressive in this area. They now have the ability to access chemical toxicity data. Some are even attempting to conduct mortality studies of previous members. The United Auto Workers have developed and issued to its members a brochure on epidemiology, what to look for in the workplace, types of illness and deaths that could be work related and to report this information back to the union headquarters.

All unions are aware of these state Right-To-Know regulations and the Federal Hazard Communication standard because most have occupational health specialists on their staffs and they have been very successful in lobbying for passage of these regulations. Both represented and non-represented plants have experienced numerous requests for information on materials in the workplace from employees.

Unions in general favor having joint Management-Union Occupational Safety and Health Committees. (W) continues to promote the use of our safety observer program and we contend this program, if properly presented, will meet this need to involve the workers in the plant occupational safety and health program. In fact, Headquarters Safety revised this program in 1981 and promoted its use through "Train the Trainer" seminars.

Within the last year we have had to respond to union requests for information on employee exposure to hazardous material at former (W) plants i.e. Lester, Bloomfield, Sharon.

11/6/87

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