

HOW TO HANDLE EMPLOYEE AND LOCAL UNION REQUESTS
FOR EMPLOYEE HEALTH DATA

- I. Where exposure standards have been set by OSHA, management is to notify employees, individually, of:
 1. The employee's exposure to toxic materials or harmful physical agents in excess of the levels set by the standard, and corrective action being taken by management.
 2. Where requested by the employee, plant records which indicate the level of the employee's exposure.
- II. Management, upon request only, of local union representatives, is to provide such representatives with the same information given to individual employees under I, above.
- III. Management, upon request only, of either an employee(s) or the local union representatives, in cases where exposure standards have been set by OSHA:
 1. Is to provide the employee(s) and/or their local union representatives -- depending on the form of the request -- an opportunity to observe monitoring/measuring of employee exposure to the material/agent.
 2. Is to provide the employee(s) and/or their local union representatives -- depending on the form of the request -- access to records of such monitoring/measuring.
- IV. Except as provided in I, II and III above, requests by local union representatives for "industrial hygiene data," "occupational disease cases data," lists of all chemicals with which employees come into contact, all data on all monitoring/measuring, etc., will be handled as follows:
 1. Local union representatives will be told time is needed to prepare a response (that it is a complicated question; or that all or parts of the data requested are not currently available; not that clearance is needed from St. Louis).
 2. The question/situation will be forwarded to the operating company personnel department.
 3. The operating company personnel department will review the situation with corporate medical, corporate labor law and corporate labor relations. As limited a response as deemed appropriate will be developed.

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4. The site management response to the local union will be oral, but reduced to writing upon request. (Where oral, accurate notes will be kept by management.) When data not currently available becomes available, a decision must be made whether or not to provide it, voluntarily, to the local union representatives.

- V. It should be noted that these "How to Handle" guidelines cannot cover all the situations nor allow for the nuances of local plant employee and union relationships. For a plant's industrial hygiene effort to be effective, a positive approach is necessary to employees and union representatives as to what's being done, where problems are, and what cooperation is required from employees. Plant management, with the concurrence of the operating company personnel department, should develop their own positive communications efforts. However, whenever possible, "broadside" and/or "antagonistic" and/or "suspicious" union requests should be resisted as outlined in IV, above.

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