

- The group assigned responsibilities for revising OIIR guidelines as follows:

- A. Greene - back injuries
- M. Freifeld - reporting forms
- F. Cuga - observation period
- C. Richards - comparison with prior editions

The above items will be submitted to the Occupational Safety and Health Committee for concurrence.

* * * * *

Next Meeting

The task group will meet again June 3, 1982, at CMA.

The meeting was adjourned at 2:00 p.m.

Milton Freifeld
Milton Freifeld
Associate Director
Health, Safety, and
Chemical Regulations

Minutes Subject to Approval
MF:jb 3/18/82

cc: G. Strickland
P. Joyce
T. Evans
C. Ryan

OCCUPATIONAL SAFETY & HEALTH COMMITTEE

REPORT TO THE
BOARD OF DIRECTORS
JANUARY 11 & 12, 1982



CHEMICAL MANUFACTURERS ASSOCIATION

Formerly Manufacturing Chemists Association — Serving the Chemical Industry Since 1872.

AGREED

OCCUPATIONAL SAFETY & HEALTH COMMITTEE

REPORT TO THE
BOARD OF DIRECTORS
JANUARY 11 & 12, 1982

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OCCUPATIONAL SAFETY AND HEALTH COMMITTEE

EXECUTIVE SUMMARY

Major Accomplishments

Major accomplishments of the Occupational Safety and Health Committee include:

- Providing information and technical expertise to regulators and legislators who look to the Committee for industry representation on occupational safety and health issues.
- Providing a major portion to CMA's contribution to Vice President Bush's Regulatory Reform Task Force.
- Revising its task group structure in late 1980 to react quickly to new trends.
- Bolstering the CMA safety awards program to improve the industry's image.

Health

Revision of OSHA's cancer policy was one of CMA's top ten priorities sent to the Regulatory Reform Task Force. The Agency has not carried out the existing policy but plans to review it soon.

Reproductive hazards in the workplace remain a major chemical industry concern. In its comments on the Interagency Regulatory Liaison Group's (IRLG) guidelines for control of reproductive hazards, CMA discussed the complexity and lack of information on this subject. Under the new administration, the successor to IRLG, the Interagency Science/Health Coordination Group, is continuing to prepare new guidelines; this time with input from industry, including CMA representatives.

CMA reiterated its comments to IRLG in a formal response to the Council on Environmental Quality (CEQ) on their draft document, "Chemical Hazards to Human Reproduction."

In addition, CMA filed an amicus brief supporting a member company's embryofetotoxin policy. The key issue is whether the company can protect the fetus by excluding women of childbearing capacity from workplaces where they may be exposed to fetotoxins. CMA also commented on proposed Equal Employment Opportunity Commission guidelines in this area which were eventually withdrawn.

In comments to OSHA, CMA recommended that stays be continued on the amendment to the occupational noise standard. CMA made additional suggestions on remaining parts of the standard to permit continued use of hearing conservation programs which have been so successful in the chemical industry.

OSHA also interpreted parts of the rule on access to employee records to provide increased protection for trade secrets. CMA recommended that

negotiations with employee representatives, not regulations, should determine the conditions for allowing access to records with trade secrets. Moreover, CMA has intervened in the AFL/CIO lawsuit to prevent further broadening of access to employee records.

In response to OSHA, CMA stated that laboratories should be the subject of separate rules rather than required to comply with general industry regulations. Such rules would lighten their recordkeeping and monitoring burden. Moreover, OSHA has proposed a revision to its lead standard in keeping with the CMA suggestion of using qualitative respirator fit testing.

CMA cosponsored a pioneering course in cooperation with the American Occupational Medical Association (AOMA), to inform primary care physicians and other health professionals about occupational medicine.

In a cooperative venture with NIOSH, CMA cosponsored a two-day symposium in control technology in the chemical manufacturing industry. The event was well received by the participants.

As part of the Hazards Communications Special Committee, the OSH Committee played a key role in formulating CMA policy on labeling. OSHC worked closely with OSHA personnel and participated in the hearings before Congressman Gaydos' Health and Safety Subcommittee of the House Committee on Education and Labor.

Safety

In written comments and testimony at an OSHA hearing on Hazardous Materials (Subpart H), CMA requested a substantial delay in the rulemaking procedure to allow time for considering major changes in rules. CMA is suggesting that standards be performance goals that address workplace hazards. They should include workpractices plus training and education requirements, thus de-emphasizing equipment rules.

CMA testimony on lockout and tagging of equipment helped deflect a rigid rule. The regulation would have required extensive and costly changes in the practices of many member companies.

CMA specifically, argued against a proposed rule on conveyors. While the Agency may yet publish such a rule, it would now probably be a performance goal so that compliance would not be an unreasonable burden for the chemical industry.

CMA endorsed OSHA proposals for targeting safety inspections and made suggestions for improvement. These included the use of OSHA recordable injuries and self-reporting of these data to the Agency. We will continue to work with OSHA on this matter.

CMA argued that walkaround pay is a collective bargaining issue rather than a safety issue. The final rule has been revoked by the new OSHA administrator.

CMA recommended the exclusion of bulk liquid terminals from a proposed OSHA regulation on marine terminals. Existing regulations adequately protect workers at such terminals.

Finally, the new administration is changing OSHA's attitude toward industry from one of confrontation to one of cooperation. As part of this process they are rewriting the Field Manual. CMA endorsed the Agency's draft of Instructions to compliance personnel on complaint procedures and the General Duty Clause of the OSH Act. We also made some technical comments on these drafts.

Legislation

OSHC worked with Senate staff members to support the Schwaiker Bill. The Bill would have eased the inspection burden on relatively safe companies.

Overall OSHC/Staff Activities

The program, structure and management of OSHC were strengthened by reexamining task group missions. Consequently a group on Health Standards was established to deal with specific health concerns such as cancer policy, hearing conservation, and reproductive hazards. Further realignment and personnel changes are planned to handle new issues as they arise. The effectiveness of CMA staff was significantly improved through better coordination with the Government Relations and Legal Departments.

OSHC's efforts were refined to increase the Committee's impact on legislative and regulatory processes. Refinements were designed to:

- Identify at an early stage, emerging occupational safety and health issues.
- Establish timetables for early drafts to allow member companies to use applicable arguments in their own responses to requests for comments from public agencies.
- Monitor and influence NIOSH and OSHA research programs.

Member Company Personnel

Ninety-seven people from 38 companies participated in OSHC efforts. In the coming year, participation by member company personnel is expected to increase about 20 percent because of the opportunity to change regulatory policies under the Reagan Administration.

CMA Staff Personnel

One professional and one supporting staff member are assigned full time to OSHC. However, the Committee is part of the Health, Safety and Chemical Regulations Division and assistance and advice are available from the director and other members of the Division and from senior CMA staff.

Routine professional support from outside the Technical Department includes the equivalent of one attorney from the Legal Department and one-fourth person from the Government Relations Department. Also, the librarian has helped organize and distribute background documents to interested members.

Budget

The Fiscal Year 1981/1982 Research and Consulting budget for OSHC, \$45,000, reflects a planned emphasis on occupational medical training. It also includes starting a project to analyze costs of compliance with OSHA rules. Planned expenditures for health and safety grants during Fiscal Year 1981/1982 are the same as for last year, about \$10,000.

Value to Industry

We do not currently have a way to quantify dollar savings attributable to Committee activities. Yet we should keep in mind, important employee relations and public image aspects of the Committee's work. Estimates of avoidance of added costs are in the following categories:

- Redirection in agency programs. There are billions of dollars in potential savings if we succeed in deflecting inappropriate rules, and improving others.
 - Draft revision of the ANSI Z129.1 labeling standard is serving as a basis for discussions with OSHA in its rulemaking efforts.
 - Elimination of inappropriate requirements, as in the noise standard, avoids costly conflicts with the Agency.
 - Revision of the OSHA cancer policy to put it on a firmer scientific basis will preserve many commercial products.
- Savings due to timely and sound comments in early stages of agency programs.
 - Continuing CMA input to the Interagency Science/Health Coordination Group on reproductive hazards helps reduce the chance for rigid guidelines based on poorly developed scientific tests.
- Influencing Legislation
 - We are working with other industry groups to update our OSHA reform program.
 - We continue to work with Congressional Committees in their oversight investigations and hearings on such matters as OSHA oversight, occupational disease, hazards communication, reproductive hazards, and the like.

In addition, some Committee programs considered necessary cannot be related directly to immediate financial benefits. Examples are:

- Annual Symposia like the successful one on "Control of Workplace Hazards in the Chemical Manufacturing Industry," in Philadelphia, March, 81.
- Safety Awards Program
 - Lammot DuPont Safety Award
 - Certificates of Achievement and Honor
- Safety Statistics
 - Occupational Injury and Illness Reports
- Legal action on OSHA regulation on Access to Employee Records and the issue of protecting the fetus from fetotoxins in the workplace.

● Education

- In cooperation with the American Occupational Medical Association, we co-sponsored an innovative course to inform private family physicians about occupational illnesses. It was held October 2 and 3, 1981, in Charleston, South Carolina.
- A task group has been established on worker education to keep abreast of the 'state of the art' in industry and to become familiar with the thinking in the agencies so that proposed regulations can be anticipated.
- An informational meeting was held April, 1981, to keep member company representatives abreast of OSHC activities.
- At the semi-annual meeting in November 1981, the committee played a major role in presenting the program on 'Right-to-Know'. It raised the consciousness of many in the audience to the issues involved and offered suggestions for dealing with them.

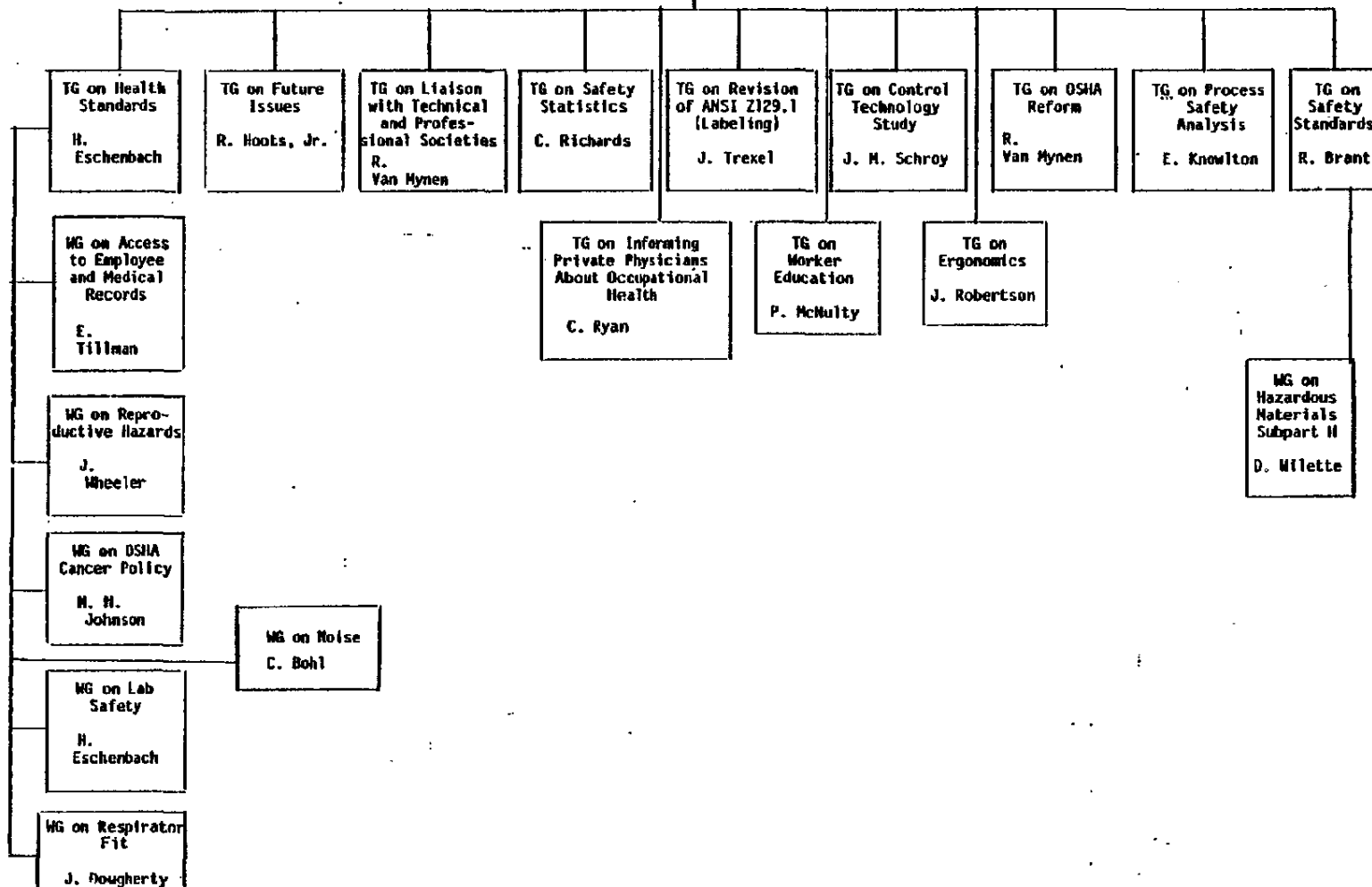
OCCUPATIONAL SAFETY AND HEALTH COMMITTEE

Charter

With respect to occupational health, plant safety, fire protection, and precautionary labeling matters significant to the chemical manufacturing industry, the Committee will: serve as a forum for discussion of chemical manufacturing industry concerns; develop and recommend to the Executive Committee policies and positions on legislative, regulatory, and technical questions; and provide support for authorized Association programs.

OCCUPATIONAL SAFETY AND HEALTH COMMITTEE

Chairman: T. Evans



Occupational Safety and Health Committee: Identify key occupational safety and health issues and establish specific objectives to deal with them. Try to anticipate as well as react to regulatory and legislative initiatives on this subject. Seek to become a major force to which the Agencies turn for industry representation on all occupational safety and health issues. Keep member companies informed of major trends and association action in this area. Initiate and sponsor research and development on related issues. Oversee the safety awards program as well as collection and publication of data on occupational injury and illness.

B: June 1981
Chairman: Thomas F. Evans
D: June 1982
Staff Executive: Milton Freifeld
M: 15

Task Group on Health Standards: Try to avoid regulations where not needed. Assist OSHA in issuing reasonable regulations when they are necessary.

B: July 1981
Chairman: Harry Eschenbach
D: May 1983
Staff Executive: Milton Freifeld
M: 12

Work Group on Access to Employee & Medical Records: Guide implementation of CMA decisions regarding legal and regulatory action on access to employee and medical records.

B: July 1980
Work Group Leader: Ernest Tillman
D: July 1982
Staff Executive: Milton Freifeld
M: 4

Work Group on Reproductive Hazards: Respond to regulatory and legislative initiatives, anticipate agency actions and disseminate relevant information to member companies relating to reproductive hazards.

B: May 15, 1980
Work Group Leader: J. R. Wheeler
D: December 1983
Staff Executive: Milton Freifeld
M: 11

Work Group on OSHA Cancer Policy: Attempt to have OSHA modify this regulation along lines proposed by AINC. Participate in administrative process for regulating individual chemicals where matter of principle is involved when OSHA begins to implement its cancer policy.

B: July 1980
Work Group Leader: M. N. Johnson
D: May 1982
Staff Executive: Janet A. Steel
M: 5

Work Group on Lab Safety: Encourage separate OSHA regulations or guidelines for laboratories so they can be relieved of general industry requirements for recordkeeping and monitoring.

B: March 1981
Work Group Leader: Harry Eschenbach
D: December 1982
Staff Executive: Milton Freifeld
M: 3

Work Group on Respirator Fit: Work with other industry groups to have OSHA adopt a qualitative fit test for respirators. It has been tested in the workplace and found far less expensive than the current quantitative test.

B: July 1981
Work Group Leader: J. Dougherty
D: May 1983
Staff Executive: Milton Freifeld
M: 5

Work Group on Noise: Support OSHA in promoting a performance standard on hearing conservation programs.

B: August 1981
Work Group Leader: C. Bohl
D: December 1982
Staff Executive: Milton Freifeld
M: 9

Task Group on Future Issues: Provide early warning on major legislative and regulatory issues regarding safety and health. Recommend course of action and priority in each case.

B: July 1981
Task Group Leader: C. Waisanen
D: May 1983
Staff Executive: Milton Freifeld
M: 7

Task Group on Liaison with Technical and Professional Societies: 1) Provide CMA input to the policy-making and other functions of these associations. (2) Obtain information about safety and health issues facing the chemical industry.

B: July 1979
Task Group Leader: Ronald Van Mynen
D: May 1983
Staff Executive: Milton Freifeld
M: 2

B = Beginning Date
D = Sunset Date
M = Membership

Task Group on Safety Statistics: Update instructions for member companies wishing to participate in the CMA program on Occupational Illness and Injury Reports, Lamont Dupont Award, and Certificates of Achievement and Honor programs. Encourage member company participation.
 B: September 1978 D: December 1983 M: 8
 Task Group Leader: C. Richards Staff Executive: Milton Freifeld

Task Group on Revision of ANSI Z129.1 (Labeling): Assume key role in discharging responsibilities of CMA as secretariat in the revision of ANSI Z129.1 (American National Standards for the Precautionary Labeling of Hazardous Industrial Chemicals) in accord with ANSI requirements.
 B: May 1981 D: May 1983 M: 9
 Task Group Leader: J. J. Trexel Staff Executive: Rita Conetto

Task Group on Safety Standards: Influence OSHA to issue reasonable regulations where necessary and avoid regulations entirely where they are not needed. Draft responses to agency proposed standards.
 B: January 1979 D: May 1983 M: 11
 Task Group Leader: R. Brant Staff Executive: Milton Freifeld

Work Group on Hazardous Materials (Subpart H): Suggest to OSHA the development of work practice performance standards which could be used for a variety of hazards.
 B: June 1980 D: December 1982 M: 4
 Work Group Leader: D. Wilette Staff Executive: Milton Freifeld

Task Group on Control Technology Study: Discuss with NIOSH and their contractor Enviro Control their planned study on control technology in the chemical manufacturing industry.
 B: March 1981 D: June 1983 M: 3
 Task Group Leader: J. M. Schroy Staff Executive: Milton Freifeld

Task Group on OSHA Reform: Many OSHA Regulations and attitudes were anti-industry. Work with present administration to maintain even-handed approach to rulemaking. Consider legislative action to consolidate gains.
 B: July 1980 D: July 1982 M: 6
 Task Group Leader: R. Van Mynen Staff Executive: Milton Freifeld

Task Group on Informing Private Physicians about Occupational Health: To catalyze a program for bringing information about occupational health to family physicians, in cooperation with professional associations
 B: July 1980 D: July 1982 M: 5
 Task Group Leader: C. Ryan Staff Executive: Milton Freifeld

Task Group on Worker Education: Gather industry information on this subject that will be useful in responding to regulatory and legislative initiatives. This data will also be distributed to member companies.
 B: October 1980 D: May 1982 M: 10
 Task Group Leader: P. McNulty Staff Executive: Milton Freifeld

Task Group on Ergonomics: Keep abreast of government thinking on ergonomics and inform the Committee and member companies of trends.
 B: October 1980 D: May 1982 M: 5
 Task Group Leader: J. Robertson Staff Executive: Milton Freifeld

Task Group on Process Safety Analysis: Gather data for dissemination to members about techniques for analyzing process safety programs and how to use this information.
 B: July 1981 D: July 1983 M: 5
 Task Group Leader: E. Knowlton Staff Executive: Milton Freifeld

B = Beginning Date
 D = Sunset Date
 M = Membership

Milton Freifeld/bal
 120781

COMMITTEE ACHIEVEMENTS
FY 1980 - 1981

OCCUPATIONAL SAFETY AND HEALTH COMMITTEE

Achievements FY 1980 - 1981

Committee achievements in each of the following categories are listed in order of their significance to the chemical industry:

Legislative:

- OSHA Reform

CMA worked on developing constructive recommendations for OSHA reform designed to change administratively the Agency's adversarial approach, emphasize performance standards, reward good safety records and support President Reagan's Executive Order No. 12291 on regulatory relief. This CMA effort is in close cooperation with the Chamber of Commerce and the National Association of Manufacturers.

The Schweiker bill would have relieved companies with good safety records from routine safety inspections. We supported this bill in the last Congress.

- Workers' Compensation

CMA continues to work with House and Senate committees which are considering legislation to establish uniform national minimum standards for state workers' compensation for victims of occupational diseases in several specific industries. CMA is maintaining a presence with key committees, particularly regarding proposed occupational disease standards, to be in a position to help shape the outcome should passage of this legislation become more likely.

Regulatory:

- In a letter to the Council on Environmental Quality, CMA said the short time allowed for review of a draft report on reproductive hazards precluded adequate peer review. Nevertheless, some technical errors in the draft were pointed out. CMA stressed that without a sound framework to deal with the current state of the art, federal regulators may be misdirected. This point was also emphasized in CMA comments on the Interagency Regulatory Liaison Group's draft guidelines on reproductive hazards.

As recommended by CMA, the Equal Employment Opportunity Commission and the Department of Labor withdrew proposed guidelines on workplace reproductive hazards.

Also as recommended by CMA, the Office of Management and Budget withheld approval of the National Institute of Health's proposed "Occupational Cancer Questionnaire."

- CMA met with Thorne Auchter, Assistant Secretary of Labor, to present CMA's recommendations on priorities in standards development and changes in the Agency. This included a suggestion to review the Agency's cancer policy.
- CMA submitted position papers on OSHA regulations on cancer policy, noise, walking and working surfaces and hazardous materials in response to Vice-President Bush's request to identify priority regulatory concerns.
- On August 7, 1981, OSHA proposed modification of the trade secret provision of the access to employee records regulation. CMA urged that the change should permit employers to include liquidated damage clauses or the like in confidentiality agreements with employees and their representatives. CMA is involved in litigation on the access to records issue.
- CMA asked Secretary of Labor Raymond L. Donovan to postpone the effective date of the final noise rule amendment issued during the last days of the Carter Administration.
- A CMA targeting plan for safety inspections is similar in concept to one drafted by OSHA, but with important differences:
 - (1) CMA's plan of self-reporting improves OSHA's effectiveness by avoiding the need for trips to sites where an inspection is not required.
 - (2) The CMA plan uses the OSHA recordable injuries, which give a broader measure of performance.
- The Association recommended that OSHA's effort to modify Subpart H, Hazardous Materials, be reconsidered and asked for a 90-day extension if the Agency persists.
- CMA filed comments urging OSHA not to issue an equipment-specific standard like the one proposed for conveyors and instead, to rely on hazard-oriented, performance standards.
- In response to OSHA questions about regulations for laboratories, CMA recommended that laboratories be covered by separate rules rather than general industry requirements.

- CMA recommended to OSHA that pesticides and similar generic classes should not be singled out for regulation.
- CMA commented to OSHA that there was no need for its proposed rule on walkaround pay for employees during formal inspection.
- Workers at bulk liquid terminals are already adequately protected by existing regulations. Hence, CMA wrote in comments to OSHA, such locations should not be covered in proposed regulation on marine terminals.
- In comments on the U.S. Coast Guard (USCG) report "Principles of Toxicological Interactions Associated with Multiple Chemical Exposures", CMA said the first consideration should be to adequately protect USCG personnel. We also recommended that the development of early warning systems for chronic occupational illnesses should be undertaken in conjunction with other interested parties.

Community and Public Relations:

- CMA worked closely with member companies who refuted a misguided study by the Council on Economic Priorities (CEP). We obtained an analysis of the CEP study by the Department of Labor pointing out the errors in their data base and their use of inappropriate measures of safety performance.
- We publicized the fine safety record of our industry and the winners of CMA safety awards.

Educational:

- CMA held a joint symposium with the National Institute for Occupational Safety and Health.
- We helped organize and conduct the first course of its kind on industrial medicine for primary care physicians and other health professionals.
- Through periodic newsletters and an informational meeting last spring, we kept interested personnel in member companies informed about major occupational safety and health issues.

GOALS AND OBJECTIVES

OCCUPATIONAL SAFETY AND HEALTH COMMITTEE

GOALS AND OBJECTIVES

FY 1980 - 1981

Health

- A. Maintain communication with various agencies so we can "educate" them on the intricacies and problems of dealing with workplace reproductive hazards.
- B. Assist in convincing OSHA and EPA to keep regulations on labeling reasonable and performance-oriented.
- C. Limit, as much as possible, access to employee records to those with a legitimate need to know.
- D. Monitor OSHA's implementation of its cancer policy as it is applied to specific chemicals and where precedent is involved, work with member companies to defend specific chemicals.
- E. Catalyze programs, in cooperation with professional organizations, that inform general practice family physicians about occupationally caused illness.
- F. Prevent enactment of legislation based on emotion and poor science that could lead to inordinate costs.

Safety

- G. Continue commenting to OSHA early in the rulemaking process on contemplated regulations.
- H. Encourage a larger proportion of our membership to participate in the Safety Awards and Safety Statistics programs.

Safety and Health

- I. Maintain close coordination with sister associations to develop more effective strategies and to use resources efficiently.
- J. Plan strategy for OSHA reform on both legislative and administrative level.

- K. Workshops, symposia and other means of communicating with interested people in member companies will continue to be used to air health and safety issues.
- L. Lay groundwork for substantive input to agencies where we have early signals regarding their preparation for future regulations. Cases in point are ergonomics and stress, plus worker education. Factual presentations will generally aim at increasing our credibility and stature as a resource to the agencies.
- M. The OSH Committee is dedicated to becoming a household word throughout NIOSH and OSHA. We expect agency personnel to look to this CMA group for leadership in formulating our industry's position in matters of occupational safety and health.

OCCUPATIONAL SAFETY AND HEALTH COMMITTEE

How OSHC Goals and Objectives for FY 1980 - 1981 Were Met

Health

- A. CMA representatives participated in a recent IRLG workshop charged with drafting guidelines for reproductive hazards in the workplace. We stressed the difficulties created by the early stage of development for such tests and succeeded in having numerous caveats put in the draft.
- B. The Committee played a significant role in the Hazards Communications Special Committee's work; in drafting positions and in advocating them to OSHA.
- C. CMA legal action on access to employee records continues. Also, we recently commented to the Agency about strengthening protection of trade secrets when providing access to employee representatives.
- D. Because OSHA has not implemented its cancer policy, we have not been called on to defend specific chemicals. We do plan, however, to work with the Agency in reviewing the basic policy.
- E. We cosponsored an innovative two-day course in occupational medicine for primary care physicians and other health professionals.
- F. When Congress again deals with the occupation-illness relationship, as anticipated, we will reiterate the precautions we have already stated.

Safety

- G. We filed comments with OSHA during the early stages of regulation development for noise, hazardous materials, conveyors and other proposals. Further, drafts of planned CMA positions were sent to member companies for their use.
- H. A campaign to boost members' participation in our safety statistics and awards programs was moderately successful, but still not adequate. The Committee is developing new plans to improve participation.

Safety and Health

- I. CMA staff members participate regularly in meetings on OSHA with staffs of other trade associations. The work is distributed among participants to prevent overlap. We also have a loose coalition with a smaller staff group who have close ties to the chemical industry.
- J. The new administration has completely changed the Agency's former adversarial attitude toward industry. We are working closely with the current administrators to help effect other beneficial changes. A program for legislative reform will be prepared during the next year.

- K. The Committee cosponsored with NIOSH a symposium on control technology. An information meeting was also held to update people in member companies about OSHC activities.
- L. A task group on ergonomics is gathering information on the subject and will report soon. The Worker Education Task Group is developing a questionnaire to determine members' needs related to worker education programs. Results will be reported when available.
- M. We are providing necessary operating, technical and scientific information to the Agency. Also, we are initiating a program encouraging personal interaction between members of the OSH Committee and Agency personnel in areas of common interest.

OCCUPATIONAL SAFETY AND HEALTH COMMITTEE

Goals and Objectives of 1981-82

- A. Remain a significant source for agencies to call upon to develop scientific and regulatory positions on key issues of occupational safety and health.
- B. Promote CMA cooperative attitude and leadership position at agencies.
- C. Influence agencies to approach state occupational safety and health plans cautiously to avoid proliferation of various conflicting state regulations.
- D. Help OSHA to develop a targeting plan for health inspections.
- E. Make better use of occupational injury and illness (OII) data to improve industry's image and to assist OSHA in targeting inspections.
- F. Assist the agencies every way we can to achieve our common goal of reducing workplace illness and accidents.

OCCUPATIONAL SAFETY AND HEALTH COMMITTEE

How We Plan to Meet the Goals and Objectives of 1981-82

- A. Continue to provide thoughtful written and oral comments to agencies from the time a regulatory initiative is conceived through its entire development.
- B. Establish close working relationships with Agency personnel at all levels. Continue the practice of inviting key government people to attend part of each Committee meeting.
- C. Promote OSHA promulgation of suitable regulations, such as labeling, which should have a preemptive effect on state laws.
- D. Offer ideas, data, and expertise to the Agency.
- E. Improve our credibility by increasing the proportion of member companies participating in our OII Reports. Simplification of forms and rules plus an intensive campaign should accomplish this.
- F. Suggest to the Agency, adoption of performance rules that consist of successful methods currently used in our industry.

BUDGET

BUDGET

1980 - 1981 Research and Consulting Expenditures and Results:

Health and Safety Project Grant -- \$10,150

Grants for health and safety projects of \$10,150 were used to provide seed money for the pilot effort on informing private physicians about occupational medicine and to support an industry-wide research program on hearing conservation. These are worthwhile endeavors that we believe are providing useful information and helping to improve our industry's image.

PROJECTED RESEARCH AND CONSULTING BUDGET

FY 1981 - 1982

Expenditures for health and safety project grants are expected to remain at the same level as last year, about \$10,000. However, new areas may be included.

Increased attention will be given to occupational medical training. In addition to expanding the courses for family physicians, a program on disaster response training may be started. CMA has budgeted \$25M for this effort.

Currently, we lack data on the cost of compliance with OSHA regulations. We will investigate means of generating such estimates, particularly for proposed new rules or those considered for elimination. These efforts will be closely coordinated with CMA's Regulatory Impact Special Committee. Because studies are not planned until March 1982, only \$10M is budgeted for FY 81/82.

COMMENTS, STATEMENTS & PETITIONS

<u>Submitted</u>	<u>Document</u>
11/80	Comments of Chemical Manufacturers Association on IRLG Reproductive Toxicity Risk Assessment Work Plan.
12/29/80	Comments of Chemical Manufacturers Association on proposed rulemaking on Walkaround Compensation, 45 FR 75232, Nov. 14, 1980.
12/29/80	Comments of Chemical Manufacturers Association on proposed standard for Conveyors, FR 75238, Nov. 14, 1980.
12/30/80	Comments of Chemical Manufacturers Association on draft document "Chemical Hazards to Human Reproduction," Council on Environmental Quality, 11/26/80.
12/31/80	Comments of Chemical Manufacturers Association on NIH proposed "Occupational Cancer Questionnaire" 45 FR 77529, Nov. 24, 1980.
1/30/81	Comments of Chemical Manufacturers Association on Generic Pesticides Standard, 45 FR 80078, Dec. 2, 1980.
2/2/81	Comments of Chemical Manufacturers Association on U.S. Coast Guard report, "Principles of Toxicological Interactions Associated with Multiple Chemical Exposures".
2/11/81	Comments of Chemical Manufacturers Association on proposed guidelines on Mutagenicity Risk Assessment, 45 FR 74984, Nov. 13, 1980.
3/3/81	Comments of Chemical Manufacturers Association on the Occupational Noise Exposure Standard, 46 FR 4078, Jan. 16, 1981.
3/13/81	Comments of Chemical Manufacturers Association on Hazardous Materials, ANPR 46 FR 7692-7699, Jan. 23, 1981.
3/13/81	Comments of Chemical Manufacturers Association on proposed conveyor standard, 46 FR 3916, Jan. 16, 1981.
7/6/81	Comments of Chemical Manufacturers Association on Qualitative Fit Testing under the lead standard, NPR 46 FR 27358, May 19, 1981.