

TGG: ~~JCE~~ MMG: ~~AJO~~ RF  
XF: 1002

TO: Distribution

FROM: T. G. Grumbles  
DATE: November 28, 1988

VISTA

Interoffice  
Communication

SUBJ: INDUSTRIAL HYGIENE MEETING ACTION ITEMS

Below are the action items from the industrial hygiene meeting held November 15-16 at Lake Conroe. There will be detailed follow-up on several of the items. Correspondence regarding these items will follow in the near future.

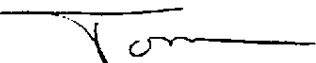
1. Copies of the overheads used during the meeting will be sent to all attendees - TGG (these are attached)
2. By December 9 anyone interested in commenting to OSHA on the generic exposure monitoring ANPR should contact TGG.
3. Determine how the Houston office number can go on the Vista MSDS's to avoid Safety Directors getting calls for additional copies - MMG/AJO
4. Form a team to improve the industrial hygiene audit process- (TGG will initiate action with Manufacturing Management).
5. Any Safety Director having written audit systems on file will send a copy to TGG.
6. Houston will consider copying Plant Managers on specified information such as new regulations and necessary actions to be taken.
7. Jim Harris will send information on the in-plant labelling system used at LCCC, Aberdeen and OKC to Campanella, Martin, and Lipps.
8. TGG will specifically review the TSCA training needs and explore developing a VISTA "corporate" program.
9. Jim Harris will send copies of his sampling forms to the Safety Directors.
10. TGG will summarize the results of the IH needs brainstorming session in a memo with suggested actions.
11. MMG/DLC will send a HAZWOPER data needs form to the Safety Directors for completion and return to DLC.
12. TGG will prepare a memo regarding IH data security and long term storage options.

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13. Attendees will send their equipment lists to George Shirley for preparation of a "master" list.
14. Dr. Drumwright will prepare a memo summarizing issues raised in the generic medical testing ANPRM.

Thank you for your efforts and participation at the meeting. As always we've got a lot of work to do in the near future. You'll be hearing from me soon regarding Items 4, 8, 10 and 12.



T. G. Grumbles

dlj  
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Distribution: Safety Directors, D. L. Morgan

cc: Plant Managers, JAD, THH, JRD, WLM, DLC, MMG, AJO, CDM

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|                   | Aberdeen | VCM | LAB | LCCP | OKC | R&D | Ham | Balt | Blane | PP |
|-------------------|----------|-----|-----|------|-----|-----|-----|------|-------|----|
| VCM*              | X        | X   |     |      | X   | X   |     |      |       |    |
| Lead*             | X        |     |     |      |     | X   |     |      | X     | X  |
| Bz (done)         |          |     | X   | X    |     |     |     | X    |       |    |
| MeCl*             |          |     |     | X    |     |     |     |      |       |    |
| EO                |          |     |     | X    |     | X   |     |      |       |    |
| Noise*            | X        | X   |     | X    | X   |     |     |      | X     | X  |
| Asbestos          |          | X   |     | X    |     |     |     | X    |       |    |
| HF*               |          |     | X   |      |     |     |     |      |       |    |
| Resp. Protection* | X        | X   | X   | X    | X   | X   | X   | X    | X     | X  |
| Noise             |          |     |     |      |     |     |     |      |       |    |
| Haz Com           | X        | X   |     | X    |     | X   | X   | X    | X     | X  |
| TSCA*             |          | X   | X   | X    | X   | X   | X   |      |       |    |
| Hazwoper          | -        | -   | -   | -    | -   | -   | -   | -    | -     | -  |
| New Emp.          | X        | X   | X   | X    |     | X   |     | X    | X     |    |
| Contrax.          | X        | X   |     |      |     |     |     | X    |       |    |
| Instrumentation   | X        |     |     |      |     |     |     |      |       |    |
| Confined Space    |          |     |     |      |     |     |     |      |       |    |

\* Indicated need for updating

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# **INDUSTRIAL HYGIENE AUDITING**

## **GOALS**

1. AFFIRM COMMITTMENT TO PROCESS
2. CONSENSUS ON PURPOSE
3. REVIEW EXISTING SYSTEM/METHOD
4. DISCUSS ALTERNATE SYSTEMS

## **MY PERCEIVED NEEDS**

- 1) WRITTEN OBJECTIVES OF INDUSTRIAL HYGIENE AND OCCUPATIONAL HEALTH PROGRAMS
- 2) DEFINITION OF COMPANY STANDARDS OUTSIDE OF REGULATIONS
- 3) REQUIREMENT FOR WRITTEN FOLLOW-UP OR MEASUREMENT OF AUDIT ITEM WORK
- 4) TRAINING/PREPARATION OF AUDIT TEAM MEMBERS IN PROCESS AND TECHNIQUES

**GENERAL CONCERN ON RESOURCE NEEDS TO IMPROVE AND RUN THE PROGRAM**

## **PROPOSED GOAL**

**AUDITS ARE A MANAGEMENT TOOL TO MEASURE COMPLIANCE WITH APPLICABLE REGULATORY REQUIREMENTS AND COMPANY GOALS OR POLICIES IN THE AREA OF INDUSTRIAL HYGIENE AND OCCUPATIONAL HEALTH**

## **AUDIT PURPOSE**

- AUDITS SHOULD PROVIDE A MEASURE OF REGULATORY COMPLIANCE AND PROGRESS IN PROGRAMS**
- AUDITS SHOULD IDENTIFY AREAS OF DEFICIENCIES, PROGRAM NEEDS, AND PROGRAM SUCCESSES**
- AUDITS SHOULD HELP DEVELOP GOALS AND OBJECTIVES OF PLANT IH PROGRAMS**

**AUDITS DO NOT - ASSURE COMPLIANCE!  
- SOLVE PROBLEMS**

## WHO DOES THEM

- CURRENTLY DONE WITH A TEAM

## OPTIONS

- 1) CONTINUE WITH TEAM
- 2) CONTRACTOR
- 3) PLANT ONLY
- 4) CORPORATE ONLY
- 5) ?

BASIC GOAL TO ACHIEVE CONSISTENCY & QUALITY  
USE SAME STANDARDS AT EACH LOCATION

## **SCOPE OF AUDITS**

- CURRENTLY DO ALL PROGRAMS AND REGULATIONS IN A BRIEF TIME-FRAME WITH PLANT VISIT
- OPTIONS
  - 1) MORE DETAILED SINGLE OR MULTIPLE REGULATORY AUDIT
  - 2) MORE DETAILED TOTAL PROGRAM AUDIT VIA SURVEY/QUESTIONNAIRE THAT IS FOLLOWED-UP WITH A PLANT VISIT
  - 3) SITE VISIT WITH DETAILED CHECK-LIST SENT PRIOR TO VISIT
  - 4) ?

## REGULATORY OVERVIEW

### PROMULGATED SINCE WE MET

BENZENE STANDARD

- \* ASBESTOS EXCURSION LIMIT
- ETHYLENE OXIDE EXCURSION LIMIT
- \* REVISIONS TO MEDICAL AND EXPOSURE RECORDS ACCESS

### PROPOSED FINAL RULES SINCE WE MET

- \* GENERIC MEDICAL SURVEILLANCE
- \* GENERIC EXPOSURE MONITORING
- PEL REVISIONS
- \* HAZARD COMMUNICATION REVISIONS

**ANTICIPATED TO BE PROPOSED**  
**(BASED ON PUBLISHED REGULATORY AGENDA)**

12/88 RESPIRATORY PROTECTION  
11/88 CONFINED SPACES  
1/89 1-3 BUTADIENE  
12/88 FINAL HAZWOPER  
12/88 HAZWOPER TRAINING COURSE CERTIFICATION  
10/88 OCCUPATIONAL EXPOSURES TO CHEMICALS IN  
LABORATORIES

## ACCESS TO EMPLOYEE EXPOSURE AND MEDICAL RECORDS

FINAL RULE PROMULGATED: SEPTEMBER 29, 1988  
EFFECTIVE DATE: NOVEMBER 28, 1988  
PROPOSAL WAS IN 1982

REVISED RULE IS ESSENTIALLY UNCHANGED FROM  
5/23/80 FINAL RULE WITH THE FOLLOWING EXCEPTIONS:

- 1) FIRST AID AND MEDICAL RECORDS OF SHORT-TERM EMPLOYEES ARE EXEMPTED.
- 2) MICROFILM OF X-RAYS IS ALLOWED
- 3) EMPLOYER TRADE SECRET PROVISIONS NOW CONSISTENT WITH HAZ COM
- 4) UNION REPS ARE REQUIRED TO SHOW AN OCCUPATIONAL HEALTH NEED FOR REQUESTED RECORDS WHEN SEEKING UNCONSENTED ACCESS TO EXPOSURE RECORDS
- 5) NO INDUSTRIES TREATED SEPARATE WITH RESPECT TO TRADE SECRET DISCLOSURE

ACTION REQUIRED - 1) ASSURE REVISED COPY REPLACES OLD ONE

- 2) COMMUNICATE REVISION TO UNION REPRESENTATIVE

## HAZARD COMMUNICATION STANDARD REVISIONS

PROPOSED: AUGUST 8, 1988

COMMENT PERIOD ENDED: OCTOBER 8, 1988

PUBLIC HEARING HELD 11/15/88

- O ORIGINALLY EXPANDED SCOPE TO ALL WORKPLACES IN OCTOBER OF 1987
- O COMMENTS RECEIVED RESULTED IN OTHER MODIFICATIONS BEING PROPOSED
- O ALSO PROVIDED SOME CLARIFICATIONS IN PREAMBLE
- O SOME OMB OBJECTIONS IN EXPANSION
- O STAY OF EFFECTIVE DATE CONSTRUCTION INDUSTRY ETC.....ETC.....ETC.....
- O SIGNIFICANT ISSUES TO VISTA
  - LABELING EXEMPTIONS (ARTICLES)
  - APPLICABILITY OF HCS TO SUBSTANCES THAT ARE RELEASED IN VERY SMALL QUANTITIES
  - NUISANCE DUST
  - APPROPRIATE HAZARD WARNING (TARGET ORGAN)
  - HAZARD DETERMINATION PERCENTAGES

## NUISANCE DUST

- OSHA HAS A GENERIC STANDARD FOR NUISANCE DUSTS
- ACGIH HAS SOME SPECIFIC NUISANCE DUSTS LISTED WITH TLV'S AND SOME LISTED IN "APPENDIX D"
- THIS MAKES NUISANCE DUSTS ON FLOOR LIST OF HAZARDOUS MATERIALS
- ALL DUSTS COULD POTENTIALLY BE A NUISANCE
- OSHA IS LIMITING APPLICATION OF HCS TO NUISANCE DUSTS LISTED IN "APPENDIX D"

## SUBSTANCES RELEASED IN SMALL AMOUNTS

IF UNDER NORMAL CONDITIONS OF USE A HAZARDOUS CHEMICAL IS RELEASED, THE HCS WOULD APPLY UNLESS THE RELEASE WAS OF MINUTE OR TRACE QUANTITIES... AND DID POSE A HEALTH HAZARD

EXPOSURES EXCEEDING TLV OR PEL NOT ONLY CRITERIA - MUST CONSIDER "HEALTH RISK" ASPECT

CARCINOGENS ARE HEALTH RISK

PURPOSE OF HCS IS TO ENSURE DISCLOSURE OF INFORMATION ABOUT HAZARDS BEFORE EXPOSURE OR HEALTH RISK

PROVIDING INFO ONLY IF PEL EXCEEDED CONFLICTS WITH THIS PURPOSE

IF A HAZARDOUS CHEMICAL IS RELEASED EMPLOYEES SHOULD BE INFORMED

## ASBESTOS "EL" RULEMAKING

PUBLISHED: SEPTEMBER 14, 1988

EFFECTIVE DATE: OCTOBER 14, 1988

- O AMENDED 1986 ASBESTOS RULE BY ADDING AN EXCURSION LIMIT (EL) OF 1 FIBER/CC AVERAGED OVER 30 MINUTES
- O ALSO AMENDED STANDARD TO REQUIRE CERTAIN ANCILLARY PROTECTIVE ACTIONS ARE TAKEN WHEN EL IS EXCEEDED
- O FOR EXAMPLE
  - REGULATED AREAS ESTABLISHED
  - DECONTAMINATION FACILITIES
- O REQUIREMENTS - MONITORING
  - MUST SPECIFICALLY EVALUATE 30-MINUTE EXPOSURES IN OPERATIONS MOST LIKELY TO CREATE HIGH EXPOSURES
  - MUST DO INITIAL MONITORING - ANY DONE SINCE MARCH 14 WOULD COUNT
  - REPRESENTATIVE JOB SAMPLING ALLOWED
  - PERIODIC MONITORING REQUIRED IF EXPOSURE ABOVE EL (NOT SPECIFIED)

## APPROPRIATE HAZARD WARNING

- MANY LABELS FOUND TO CONTAIN ONLY PRECAUTIONARY WARNINGS (DON'T INHALE) VS. SPECIFIC HAZARDS (I.E. KIDNEY DAMAGE)
- NOT PROVIDING INFORMATION ON TYPE OR SEVERITY
- THE TERM "INCLUDING TARGET ORGAN EFFECTS" WAS ADDED TO HEALTH HAZARD WARNING DEFINITION
- SELECTION OF HAZARDS TO BE HIGHLIGHTED ON THE LABEL WILL INVOLVE SOME ASSESSMENT OF THE WEIGHT OF THE HAZARDS
- THIS DOES NOT MEAN ONLY ACUTE HAZARDS SHOULD BE INCLUDED
- MAY BE APPROPRIATE TO PROVIDE LESS INFO ON IN-PLANT LABELS DUE TO MSDS AND TRAINING PROGRAMS

## REGULATED AREAS

- MUST NOW BE ESTABLISHED WHERE EL IS EXCEEDED
- FOR CONSTRUCTION (MAINTENANCE) THIS IS NEGATIVE PRESSURE ENCLOSURE UNLESS "SHORT-DURATION" JOB AS DEFINED

### PROTECTIVE CLOTHING, HYGIENE FACILITIES, TRAINING MEDICAL SURVEILLANCE, RESPIRATORS

- NOW REQUIRED WHEN EL IS EXCEEDED

### ACTIONS REQUIRED

- 1) ASSESS MONITORING NEED
- 2) REVISE EXISTING PROGRAMS
- 3) NOTIFY CONTRACTORS TO ASSURE AWARENESS
- 4) REPLACE OLD COPIES OF THE STANDARD

## GENERIC EXPOSURE MONITORING - ANPRM

PROPOSED: SEPTEMBER 27, 1988

COMMENTS: DECEMBER 27, 1988

**PURPOSE:** AGENCY IS TRYING TO DETERMINE IF GENERIC EXPOSURE MONITORING REQUIREMENTS COULD BE USED TO SIMPLIFY FUTURE RULEMAKINGS WHERE EXPOSURE MONITORING WOULD BE REQUIRED.

**BACKGROUND:**

- 1) NO MONITORING REQUIREMENTS FOR Z-TABLE PEL'S
- 2) STANDARD WOULD ESTABLISH BROAD PERFORMANCE CRITERIA FOR ACCEPTABLE MONITORING PRACTICES
- 3) COULD INCLUDE PROVISIONS FOR
  - A) FREQUENCY
  - B) PERSONAL VS. AREA MONITORING
  - C) FULL SHIFT OR GRAB
  - D) NOTIFICATION REQUIREMENTS
  - E) ACCURACY LIMITS
  - F) PROVISIONS FOR OBSERVATION
  - G) APPLICABILITY

**ACTION REQUIRED:**

- 1) REVIEW QUESTIONS IN ANPRM
- 2) DECIDE IF WE SHOULD COMMENT