

August 23, 1988

Carole Hunter, R.N.
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Thank you for your letter of 17 August 1988, allowing me to clarify some points in The Occupational Health Policies Manual.

Sect. 4.01 deals with employment examinations, sometimes called pre-employment or preplacement examinations. Section 1.21 is the general guide for periodic chest X-ray examinations and specific requirements may be found in Section 5 of the manual.

Chest X-rays are not required annually for employees in pulmonary hazard areas (5.06) or vinyl chloride workers (5.02) unless the employee has some other indication to suggest a chest X-ray may provide a benefit greater than the risk of the radiation exposure. Individual locations have chosen to offer examinations beyond the minimum required so the differences between locations are not uncommon.

The policy on firemen and fire brigade workers deals with the situation described in OSHA regulation 1910.156 (partial copy enclosed) and, I believe, comparable to Dow's fire and loss prevention crews. It is not meant to cover operators or others who may be expected to do initial fire fighting in their area. I realize this may be quibbling but is inconceivable that all employees might be considered fire fighters otherwise. It is quite possible that a plant would not have a fire brigade, but would rely on community resources for the fire fighting beyond the initial efforts of on-site personnel. It is also true that there are no legal requirements for fire brigade members to have periodic examinations, but it has been decided within BFG that some assurance of the ability to withstand the stresses of fire fighting is required for these people.

I agree that a meeting of occupational health nurses could be of value. Several years ago such a meeting was held and well received. Under the present BFG structure, I believe, such a meeting would have to be organized by one or more business groups rather than by the corporate staff.

I hope this answers your questions adequately; if not, please ask for further clarification.


Harold W. Dietz

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