



For R&D CENTER - 401-3X9

WA 236-1362

Date October 31, 1984

Subject POSITION PAPER

WESTINGHOUSE BUILDING - 796
T. C. Litwiler
Human Resources

cc: F. S. Beal - Director, Environmental Affairs Department

Attached is a recommended draft position paper "Hazardous/Toxic Materials" as requested. Please route to appropriate personnel. Comments are to be returned to me by November 22, 1984 as per your schedule.

C. W. Bickerstaff
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Attachments

TOXIC OR HAZARDOUS MATERIALS IN WESTINGHOUSE

A. Historical Background

Westinghouse 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 Westinghouse 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 Westinghouse plants.

Once the hazardous materials were identified, then Safe Practice Data Sheets (SPDS) were developed and prepared. SPDS included the physical properties, the common Westinghouse 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 toxic substances at the Westinghouse plants, with the exception being the monitoring of employee radiation 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 Westinghouse plants varies from excellent to non-existent. Medical surveillance, audiometric exams, periodic physicals, bioassay samples, was much more prevalent including the maintenance of such records.

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 and offered for the plant industrial hygiene and safety representatives. Additional monitoring equipment was

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purchased and made available to the Westinghouse plants. Therefore, documentation of employee exposures to toxic materials or physical agents increased such that there has been more personnel monitoring of employee exposure in the last 8 years than there was in the previous 10 years.

The format of the Westinghouse 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 hazards of toxic materials, disposal of waste and recordkeeping.

Plant audits were established to review the Westinghouse plant Industrial Hygiene and Safety Programs with a written report then issued to the plant discussing the findings and recommendations.

B. Present Conditions

About 60-70 per cent of the Westinghouse 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 either have their own method of material evaluation or have little knowledge of toxic chemicals being used in the plant.

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 in many (W) plants, but other plants have given little, if any, training on proper use and control of hazardous materials.

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

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

Only two Westinghouse plants (the R&D Center and Waltz Mill Site) received employee requests for information on exposure to hazardous materials.

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. lead, arsenic and hearing conservation. However, there are still some (W) plants which do not have a mechanism for informing employees of their monitoring results.

C. New Standards and Regulations of Concern

In 1981 the State of New York enacted a Right-To-Know Law regarding hazardous materials in the workplace. Since then about one-half of the states have either proposed or legislated similar laws. In 1983 OSHA promulgated a Federal Hazard Communication Standard having similar requirements which becomes effective in 1985.

A recommended program of compliance was outlined and issued to all (W) plants advising them how and when to achieve specific requirements for the standard (Attachment 2). There is a requirement for initial and annual employee hazard awareness training which will require significant time and resources.

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).

Headquarters Industrial Hygiene is in the process of developing an occupational health data system. This system will be able to track employee exposure by chemical, plant, worker occupation, etc. and include medical surveillance results. Once implemented 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).

D. Trends in the Unions

There has been a decline in the number of new standards and inspections from OSHA under the Reagan administration, so the unions are starting to become more aggressive in this area. They now have the ability to access chemical toxicity data (Attachment 6A). Some are even attempting to conduct mortality studies of previous members (Attachment 6B). 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. Westinghouse promotes 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.