

CHEMICAL MANUFACTURERS ASSOCIATION
OCCUPATIONAL SAFETY AND HEALTH COMMITTEE

Minutes of Meeting

University Club Room A
1135 16th Street, NW
Washington, DC

Thursday
November 17, 1983
9:00 am - 3:05 pm

Attendees

Harry Eschenbach
(chairman)
Gary Sunshine
(vice-chairman)
Thomas Evans
James Filan, MD
C. Luckey Heath
Richard Lippin, MD
Paul Nees
James Norwood
Charles Richards
Charles Ryan, MD
Frank Scherber
(for B. Garber)
Lloyd Zelewski
(for C. Irwin)

Company

W.R. Grace & Company
ICI Americas Inc.
Monsanto Company
The Procter & Gamble Company
Stauffer Chemical Company
ARCO Chemical Company
Occidental Chemical Company
Air Products & Chemicals Inc.
Gulf Oil Products Company
Sun Company Inc.
Olin Corporation
Phillips Chemical Company

Absent

John Dougherty, MD
John Page
Allan Sherr

Celanese Corporation
E.I. du Pont de Nemours & Company
American Cyanamid Company

Guests

Jeanne Roberts
Gary Strobel

OSHA
OSHA

CMA Staff

Claire Boccella
Milton Freifeld
Robin Hertz
Chris Nolde (part-time)

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Action

- | | | |
|------|---|-------------------------|
| 83/1 | Approve or reject Worker Education draft report. Copies were distributed at meeting and were mailed to absent members. | OSHC |
| 83/2 | Draft charter for task group on general issues in toxicology. | J. Dougherty |
| 83/3 | Draft letter to member companies urging critical review of voluntary standards that overlap federal regulations. | M. Freifeld |
| 83/4 | Establish work group to develop CMA position on Ritter/Martin bill (H.R. 4192), under Health Standards Task Group. | C. Ryan |
| 83/5 | Establish Cancer Policy Work Group under Health Standards Task Group to review draft document from Office of Science and Technology Policy. | C. Ryan |
| 83/6 | Evaluate proposed project on purified air for respirators. | R. Fulwiler/
C. Ryan |
| 83/7 | Draft comments on OSHA Health Policy when it is published. | T. Evans |

The meeting was convened at 9:00 am.

1. Minutes of Meeting, September 20, 1983.

Minutes of the last OSHC meeting were approved as distributed.

2. Legislative Review

C. Nolde reported that Rep. Martin's bill had been incorporated as Title II into Rep. Ritter's bill (H.R. 4192). The Committee agreed that a work group should be established under the Health Standards Task Group to develop a CMA position on this bill. Congressman Scheuer wants to hold additional hearings in a different Science Subcommittee.

The Miller bill remains in subcommittee and has not proceeded to mark-up.

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3. Task Group Reports

3.1 Education and Communication

The draft report on Worker Education with the chapter on research still missing was distributed at the meeting. Committee members were asked to approve or reject it by December 1.

The group will sponsor workshops on this subject this spring in Houston, San Francisco, and Philadelphia.

The task group's draft charter was modified and approved in the following form:

"The Communication and Education Task Group will strive to provide member companies with training and education aids that will assist the industry to improve its workplace health and safety. The group will maintain liaison with the CMA Communications Department for opportunities beyond the workplace."

3.2 Health Standards

J. Dougherty is continuing to contact prospective authors to critique the ASPER report. Reviews of sections of the ASPER report by Drs. Barth and Enterline require more work before they can be accepted.

The Committee accepted in principle a proposed project to compare the value of 1-, 2-, and 3- generation reproduction studies. However, it requested a better definition of the proposal and a closer estimate of cost.

R. Fulwiler is heading a subgroup to evaluate a proposal on developing a purified air supply for respirators to replace bottled air.

The Committee believed a proposal by Charles Billings of Johns Hopkins University to study respirators' effects on worker productivity had to be modified considerably if it were to be considered at all.

C. Ryan was asked to establish a Cancer Policy Work Group to review the draft on the subject expected soon from the Office of Science and Technology Policy. This group was also charged with trying to make sure that OSHA incorporates the latest science into the cancer policy it is expected to publish.

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3.2 Health Standards (contd.)

The Reproductive Hazards Work Group continues to prepare a report to CMA member companies addressing suggestions made at the symposium on reproductive effects held last May.

A work group under the leadership of N. Gaines drafted comments on a preproposal of the Mine Safety and Health Administration on air quality. These were submitted to the Agency on November 7, 1983. The thrust of our comments was that the changes proposed by the Agency were too far-reaching and they did not have the authority to act in the manner proposed.

3.3 Process Safety Analysis

The draft report by this group is being revised again. It is scheduled for completion by the end of February.

3.4 Right to Know

The OSHA Hazards Communication rule was due to be published by the end of November. The Federal Activities Work Group prepared proposed responses to anticipated inquiries from the media once the standard is published.

3.5 Safety Standards

CMA comments were submitted to OSHA on their preproposals for Lockout and Tagout, September 29, 1983, and Confined Spaces, October 25, 1983. The Agency's document on Lockout and Tagout was in performance language and well-written. The one on Confined Spaces needed a great deal more work in our view.

3.6 Future Issues

R. Lippin gave an extensive report to the Future Issues Task Group on neurotoxicity. This subject is receiving increasing regulatory and legislative attention.

This Task Group is developing recommendations regarding the issue of real vs. perceived hazards.

J. Glick will draft a proposed CMA position on cytogenetics and a standby fact sheet on the subject.

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4. Guest Speakers

J. Roberts discussed improved national workplace safety statistics.
G. Strobel reviewed the status of pending safety and health regulations at the Agency.

5. Liaison

5.1 American National Standards Institute

The ANSI Health Subcommittee is attempting to compile information on the activities of all health standards-setting organizations (both voluntary and government). This information will be available to interested parties.

The voluntary standards-setting organizations which submit their standards to ANSI for approval have produced very few standards in the past several years.

5.2 American Occupational Medical Association

In a recent issue of Morbidity and Mortality Weekly Report, said R. Lippin, NIOSH listed the ten leading work-related diseases and injuries which included cardiovascular diseases and psychological disorders. The president of AOMA, Dr. Robert Kessler, wrote a letter to Dr. J.D. Millar, Director of NIOSH, requesting clarification of the listing of the latter diseases in a future issue of MMWR. He asked that emphasis be placed on the fact that only a small portion of lung cancers, cardiovascular diseases and psychological disorders may be directly work-related.

5.3 American Public Health Association

R. Hertz reported that APHA is considering legal action in some occupational safety and health cases. This would be a departure from their previous position.

5.4 American Society for Testing and Materials

At a meeting of ASTM Committee E-34 on Occupational Safety and Health, M. Freifeld introduced a motion for the Committee to discontinue its effort toward developing a standard on material safety data sheets. He introduced a concurrent motion for E-34 to sponsor a symposium on the OSHA Hazard Communication rule. The Committee will vote on these by letter ballot.

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5.5 International Affairs Group

IAG is comparing labeling requirements in the U.S. with those of the European Economic Community (EEC). Significant differences have been found in the definitions of the same acute and chronic hazards. IAG will see what can be done about reconciling these differences.

5.6 National Institutes for Occupational Safety and Health

J. Filan reported on a meeting, November 3, 1983, at NIOSH to discuss the protocol for a study of reproductive outcomes in persons exposed to chemicals, particularly dioxin. The protocols will be revised and submitted to EPA. If Superfund money is available, the study will be funded as a joint EPA/NIOSH undertaking.

5.7 National Toxicology Program

P. Nees is maintaining liaison with CRAC, which is commenting to NTP on its review of bio-assay methods.

5.8. Occupational Safety and Health Administration

T. Evans said that OSHA will not pursue formal changes in the Noise standard but deal with remaining issues, such as economics, administratively.

He also said the OSHA Health Policy is scheduled for publication within the next two weeks. T. Evans will draft comments on this Federal Register notice when it appears.

5.9 Regulatory Impact Special Committee

RISC has been sunset, said P. Nees, and its functions may be distributed among other CMA groups.

5.10 Special Programs Advisory Committee

G. Sunshine said a question has been raised about the need for continuing SPAC. This is currently being evaluated.

5.11 Chemical Regulation Advisory Committee

CRAC is concerned about the trend toward EPA's regulating of workplace hazards instead of letting OSHA do it. EPA has not been following the required procedure of making a determination of unreasonable risk and giving OSHA a chance

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5.11 CRAC (contd.)

to regulate first. In going along with the trend, OSHA cites lack of personnel to do the job. H. Eschenbach and G. Sunshine are working with CRAC on this issue.

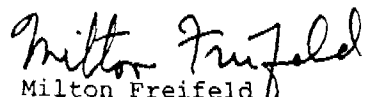
6. Informational Meeting

T. Evans reported that the program for the December 15 meeting had been arranged. The main theme of the meeting will be Right to Know and Hazard Communication. This is a departure from earlier practice of devoting informational meetings to a review of major OSHA activities.

7. Next Meeting

This will be held January 26, 1984, at CMA.

The meeting was adjourned at 3:05 pm.


Milton Freifeld
Associate Director
Health, Safety and
Chemical Regulations

Minutes Subject to Approval

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MF:mw

cc: R. Schumacher
C. Boccella
H. Eschenbach
G. Sunshine