

Carl O. Hilgarth's Commentary on "Occupational Health"

Commentary On
Occupational Health

Don Hayward is correct in his concern when several workers develop respiratory problems and complain about "those bad smelling fumes from the hot metals". When he checks this out with his superior Cal Brundage, he's told that the workplace is in full compliance with OSHA guidelines. But Don learns that only a small percentage of the chemicals in the workplace have been tested, and that OSHA guidelines do not apply to materials that have not been tested. What can he do? A lot!

To quote from Anton (1989) "In view of the increased emphasis on toxicity, it is strongly recommended that when chemicals are being purchased for plant use, processes, and manufacturing, the manufacturer should supply a "Material Safety Data Sheet" (OSHA Form 20).

The primary information shown in the data sheet for any chemical will include trade and chemical names and synonyms; chemical family, and possibly the formula; a list of hazardous ingredients; physical data; data on fire and explosion hazards; data on reactivity; proper procedures for cleaning up spills or leaks; special protection needed; special precautions that should be followed when using it; and first aid procedures in the event of an accident.

Under the Toxic Substances Control Act, purchasers should get this information from the supplier upon request. It is in the best interest of employees to ask the supplier for the Material Safety Data Sheet (MSDS) before the materials are actually delivered into your plant.

The company or plant itself must have personnel (or at least one person) who can understand and interpret the data and be able to recognize any gaps where additional information or technical expertise is required."

OSHA has a Hazard Communication Standard. Again citing Anton (1989) "this is a 'performance standard,' which means that it describes objectives that must be met, but without specifying the method for accomplishing those objectives. The method is up to the individual organization to choose. The standard requires chemical manufacturers and importers to assess the chemicals which they produce or import, and all employers to use hazard communication programs to provide information - to their employees - concerning hazardous chemicals."

All the information that Don needs is available from the chemical manufacturers under the Toxic Substances Control Act. He should not drop the matter. Under this act, the manufacturers must provide him the information he needs. He doesn't need to waste his time trying to have the reference librarian find this information. It's available free from the manufacturers. He can also call the OSHA regional office, or call his local congressman. Either can provide any information about the about the OSHA Hazard Communication Standard and Toxic Substances Control Act.

What Don has encountered is a typical management stonewall of a fundamental industrial hygiene requirement resulting from the fact that the supervisor obviously isn't knowledgeable of OSHA requirements regarding chemicals in the workplace, and doesn't want to take the time to find out about them.

Successful safety programs depend on leadership by the employer, safe and healthful working conditions, and safe work practices by employees. By ignoring the first two, ABC Manufacturing is ignoring the purpose of OSHA "to assure so far as possible every working man and woman in the nation a safe and healthful working conditions and to preserve our human resources." The OSHA inspection, when it comes, will find and cite this violation. Solve it now and avoid the potential fine and reinspection.

The best reference I have found for occupational health and safety matters, and have cited in my commentary, is:

Occupational Safety and Health Management, 2nd edition. Anton, Thomas J., McGraw-Hill, 1989