Updating OSHA Permissible Exposure Limits

Society for Chemical Hazard Communication Fall 2015 Meeting

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OCCUPATIONAL SAFETY & HEALTH ADMINISTRATION

Chemical Management and Permissible Exposure Levels Request for Information (RFI)

- The PELs RFI is the start of a dialogue intended to help OSHA consider ways to streamline PEL setting process and explore non-OEL approaches to chemical management.

- The RFI examines regulatory *and* non-regulatory approaches for controlling chemical exposures by both laying out a variety of potential regulatory solutions and novel alternative approaches, and by soliciting stakeholder input on specific questions and issues.

- The PELs RFI was published in the Federal Register on October 9, 2014.

Chemical Management and Permissible Exposure Levels Request for Information (RFI)

- OSHA has extended the comment deadline to October 9, 2015.
- The comment period is still open and OSHA values your input in particular your company's approach to chemical management.

- Docket ID: OSHA-2012-0023

Most Common Topics for Comments:

Use alternate OELs

- Internally derived OELs

Better Collaboration with Other regulatory Bodies

- Greater reliance on peer-reviewed toxicological evaluations by other Federal agencies
- ECHA/REACH

Other Approaches

- Task-based/process oriented regulations
- Banding Principles
- Substitution
- Extrapolation of data about one chemical across a group or category/QSAR

OSHA's Annotated PELs Tables

- Alternative to PELs for employers to consider.
- OSHA recognizes that many of its PELs are outdated. Most of OSHA's PELs were issued shortly after adoption of the Occupational Safety and Health (OSH) Act in 1970, and have not been updated since that time.
- Industrial experience, new developments in technology, and scientific data indicate that these adopted limits are often not sufficiently protective of worker health.
- This has been demonstrated by the reduction in allowable exposure limits recommended by many technical, professional, industrial, and government organizations.

OSHA's Annotated PELs Tables

- OSHA's annotated PELs tables include a side-by-side comparison of OSHA PELs, Cal/OSHA PELs, NIOSH RELs and ACGIH® TLVs®.

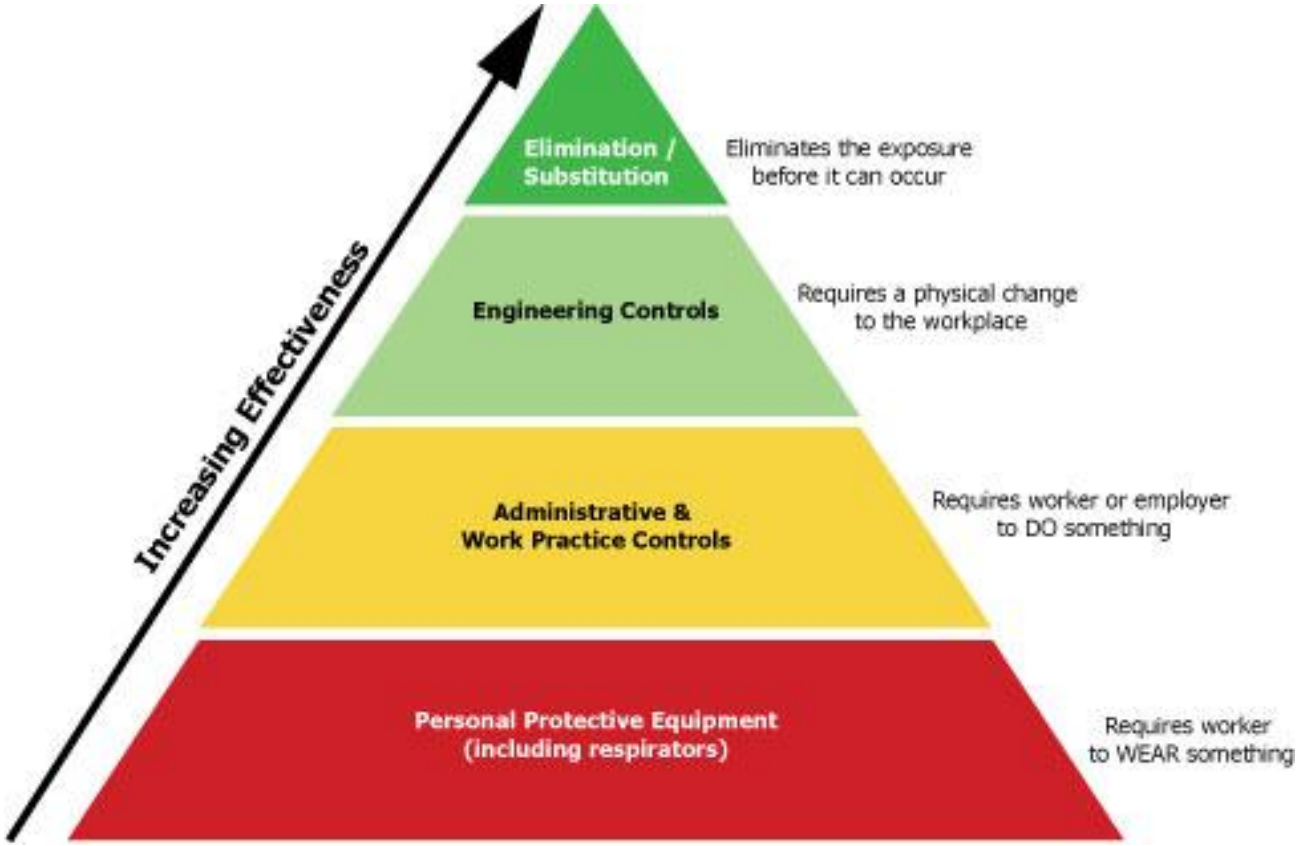
- Available at:

  https://www.osha.gov/dsg/annotated-pels/

Chemical Substitution

- Transitioning to Safer Chemicals:
  A Toolkit for Employers and Workers
  - Practical and useful alternative to updating PELs for promoting safer chemical usage and improved worker health.
  - A step-by-step toolkit designed to help business improve worker well-being through eliminating or reducing hazardous chemicals.
  - Can be used by all types of businesses, and can be used by workers as well
  - https://www.osha.gov/dsg/safer_chemicals/

Chemical Substitution



Transitioning to Safer Chemicals

Home

Why Transition to Safer Alternatives?

Basics of Informed Substitution and Alternatives Assessment

Success Stories

Watch Assistant Secretary Michaels' Introductory Video

Explore the Steps

Step 1: Form a Team to Develop a Plan

Creating a systematic change in chemical use is best accomplished by establishing a team to develop a work plan and set goals. This step will help you develop your plan.

Key Questions

- How will workers be involved in the team and throughout the planning process?
- Who should be involved in developing the work plan and setting goals for transitioning to safer chemicals (e.g., managers, supply chain partners, customers, marketers, health and safety committee members, occupational health nurse or physician, occupational health consultant)?
- What goals should be included in the plan? Consider specific goals such as eliminate carcinogens, reduce the use of hazardous chemicals by a certain percentage in a set number of years, substitute chemicals of concern from government or sector lists, etc.
- What policies, tasks, responsibilities, deadlines should be included in the plan?
- What particular drivers should you be aware of in developing the plan (existing or new laws, consumer pressures, new science)?
- How will external stakeholders be involved?

Assemble an internal team to take responsibility for developing the work plan for transitioning to safer chemicals. Consider who should be involved in the team (e.g., existing safety and health committee members, workers, managers, union representatives). It is important to involve workers

Chemical Substitution

- DSG is currently designing and implementing a 1-day Training Program to be used at OSHA Ed Centers and other organizations around the country. Pilots of the program have already been successfully tested.

SHIMS: OSHA's Safety and Health Program Management Guidelines

- OSHA is updating its 1989 *Safety and Health Program Management Guidelines*

- Building on lessons learned about successful approaches and best practices under programs such as the Voluntary Protection Programs (VPP) and the Safe and Health Achievement Recognition Program (SHARP)

SHIMS: OSHA's Safety and Health Program Management Guidelines

- Primary audience for the guidelines is small businesses and workers. OSHA's intent is to provide a straightforward and proactive way to find and fix workplace hazards.

- OSHA expects the Guidelines and tools to be published and on the website in 2016.

SHIMS: OSHA's Safety and Health Program Management Guidelines

- Guidelines will be supported by a series of tools to help employers implement the guidelines such as:
  - An employee reporting tool
  - A benchmarking tool
  - A model program tool
  - A hazard identification checklist
  - A model incident investigation tool
  - An audit tool

Questions?

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