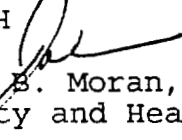


Ex. 17  
ACCSH 1994-5

MEMORANDUM

TO: ACCSH 

FROM: John B. Moran, Chair  
Safety and Health Programs Work Group.

SUBJECT: Work Group Report/Recommendations.

DATE: 8 December 1994

The Work Group met on the afternoon of 8 December 1994 to consider the scope of the Work Group activities in support of the Safety and Health Program subject. Members Paul, Osario, Rhoten and Moran were present. At the initial meeting of this ACCSH Committee, during which this Work Group was established, it was established that the Work Group would include in its scope several discrete elements which comprise a "Construction Safety and Health Program". Such elements include: PPE, Respirator Standards (1910.134), Medical Surveillance, Exposure Monitoring, and additional Program elements pertinent to the comprehensive Safety and Health Program appropriate to the employer engaged in construction.

OSSA has promulgated revised standards for PPE applicable to General Industry. Those standards are not applicable to construction, however. The previous ACCSH Committee, in recognition of the importance of the PPE standard to construction, established a PPE Work Group during its last Committee meeting. No action was taken by that Work Group owing to the prompt appointment of the new, current, Committee. PPE remains an essential matter to the construction industry.

OSHA recently published a proposed revision to the respirator standards at 29 CFR 1910.134. These revisions were originally published as a notice of proposed rulemaking in the early 80's. The respirator standards at 1910.134 have applied to construction in the past and it is assumed that the proposed rule would likewise be applicable to construction. The proposed rule, however, has not been put before ACCSH. As respiratory protection is an element of a Safety and Health Program, the Work Group considers the proposed respirator standard to be within its purview.

Safety and Health Programs include a number of additional basic elements including Medical Surveillance, Exposure Monitoring and

Recordkeeping. Recordkeeping is the subject of pending proposed rulemaking and has been a focus of a Work Group on the current Committee and the previous Committee. Medical Surveillance and Exposure Monitoring, however, are considered to "building block" standards which are in various stages of preparation as proposed rules within OSHA. It is the view of the Work Group that all of these elements are germane to the "Program" matter and should be considered by the Work Group.

Owing to the complexity of this matter and the various stages in which elements of the "Program" matter reside, it the recommendation of the Work Group that:

1. The Work Group requests that OSHA provide the Work Group with copies of the PPE standard, the proposed Respirator Standard, and current drafts of the Medical Surveillance and Exposure Monitoring proposals.
2. That the Work Group hold a full day meeting to fully review the above materials and chart a comprehensive scope of work to address this complex matter.
3. That the Work Group prepare and submit a report to the Committee at the next meeting recommending a scope of work and action plan for the Work Group.