U.S. DEPARTMENT OF LABOR
Occupational Safety and Health Administration
WASHINGTON, D.C. 20210

Office of the Assistant Secretary

4 JUN 1976

PLAINTIFF'S EXHIBIT
UC-4132

OSHA PROGRAM DIRECTIVE #200-47

TO: Regional Administrators

Subject: Industrial Hygiene Field Operations Manual

1. Purpose

To establish an Industrial Hygiene Field Operations Manual.

2. Directive Affected:

None

3. Information

On June 28, 1976, Chapter XIII of the Field Operations Manual was revised to transmit the updates in the Industrial Hygiene Inspection policy. The new Chapter XIII indicates that other documents will be provided as support that include detailed instructions for routine industrial hygiene functions. This directive establishes a new manual to contain future policy related specifically to industrial hygiene.

4. Action

The Industrial Hygiene Field Operations Manual is established as a looseleaf notebook. As entries and updates are provided the changes shall be made immediately. The manual will be loosely structured until the materials begin to develop shape. At this time (approximately one year) a formal printing will be made and the book will be distributed.

The initial documents contained in the Industrial Hygiene Field Operations Manual are as follows:

X400154

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Chapter XIII FOM - Industrial Hygiene and Occupational Health

OSHA Standard Method for Respirable Gravimetric Dust Sampling

OSHA Standard Method for Detector Tube Sampling

OSHA Standard Method for Sample Shipment to the Laboratory

OSHA Standard Method for Weighing Filters

OSHA Standard Method for Sampling Total Dust, Metal Fumes, and Liquid Aerosols

OSHA Standard Method for Noise Measurements

Responsibilities of the Safety Specialist in Industrial Hygiene

Determination of Compliance for Air Quality and Noise Standards

Ventilation

All of the documents are dated June, 1976 for reference purposes and are effective as scheduled by program directive #200-47. The manual will not be available from the Government Printing Office at this time.

5. Effective date

August 15, 1976

Morton Corn

Morton Corn
Assistant Secretary of Labor

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4. Collecting Samples. After the initial walkthrough inspection, the I.H. shall prepare a sampling schedule utilizing information collected during the walkthrough survey. The sampling schedule shall identify potential chemical and physical hazards, number of samples to be taken and the locations of potential health hazards.

   a. Representative jobs must be selected for sampling and personal sampling devices prepared accordingly. Occupations with the highest expected exposure should be monitored.

   b. It is suggested that the sampling program should be planned, if possible, to follow the particular industrial process from its beginning to the final product. If the processes are mixed throughout the plant, such as in a machine shop, the sampling program should follow each operation (degreasing, welding, machinery, etc.)

   c. All sampling equipment shall be checked and calibrated according to standard calibration methods. A record of each calibration must be included in the inspection report. The following are requirements for the sampling procedure:

X400156

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(1) All sampling, calibration and analysis shall be performed according to standard methods described in the Industrial Hygiene Manual.

(2) The levels of both physical and chemical agents in the work environment shall be measured as they relate to the workers. Unless otherwise specified in a standard, the measurements shall represent the personal exposure of the employee. The I.H. shall take measurements in close proximity to the employee (i.e., breathing zone for air contaminants, hearing zone for noise, etc.).

(3) Airborne concentrations of materials in Tables Z-1, Z-2, and Z-3 of 29 CFR 1910.1000, air contaminants, and other promulgated standards such as noise and asbestos, must be measured on the basis of 8-hour time weighted averages (except for ceiling limits).

(4) The I.H. should collect samples that represent a full-shift exposure when the

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determination of time weighted average concentration or action level is made, unless a ceiling level applies. A minimum of 7 hours of sampling is required to evaluate a full 8-hour shift. A single sample or a series of samples that represent a 7-hour sampling can be utilized.

(5) A minimum of one full-shift, time weighted average concentration shall be determined for each employee selected for the inspection. When the results indicate that the values are at or near the time weighted average required by the standard, additional samples shall be collected. In order to determine the extent of exposure in a potentially hazardous area, the I.H. may collect several dozen samples. He should remain at the workplace until all of the necessary samples are obtained. When several spot samples are collected to determine an employee exposure, the time weighted average shall be used to determine the full-shift exposure.

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d. For the evaluation of ceiling limit, a short sampling time is necessary. Instantaneous sampling should be used to determine ceiling limits so long as multiple samplings can be made in a period of time specified by the standard. Where time periods for exposure to ceiling limits are not specified in the standard, 15 minutes should generally be used to determine peak limits.

e. Records and notes shall be kept as described in the standard methods for sampling, calibrations and analysis found in the Industrial Hygiene Manual.

5. Closing Conference. The general procedure described in Chapter V of the FOM shall be followed. An immediate explanation of available inspection results shall be given along with general guidelines in controlling the hazards.

a. Since the I.H. may not have the results of environmental measurements at the end of the inspection or during the closing conference, an ultimate or second closing conference may be held by telephone, in person or by letter. At that time,

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