



Scope

This policy¹ applies at the Trust level and at the member level.

Purpose

The purpose of industrial hygiene (IH) services is to provide prompt and effective response to suspected chemical, physical and/or biological exposures and produce recommendations designed to control or prevent identified exposures.

Trust-Level Responsibilities

PennPRIME is responsible for the implementation of this program and has the authority to make necessary decisions and changes to ensure its success, including, but not limited to:

- Educating members about the circumstances in which an IH survey might be warranted.
- Responding to requests for surveys from members.
- Conducting or arranging for necessary IH surveys. This includes identifying subcontractors who can conduct the survey, assisting with analysis of samples collected, and assuring that reports with appropriate recommendations are provided to the member.
- Assisting members with implementing recommendations resulting from the IH survey.

PennPRIME has identified the following qualified providers that can be used if the member has not identified a provider. Other service providers may also be used upon approval.

Chuck Baker, CSP
Director of Safety Services
Inservco Insurance Services, Inc.

Compliance Management International
North Wales, PA

Member-Level Responsibilities

Each member is required to have a written procedure for responding to employee concerns related to industrial hygiene and chemical exposures. These types of exposures could include, but are not limited to:

- Noise exposures while using heavy equipment, workshop equipment, groundskeeping, or other high sound-level equipment
- Exposures to airborne chemicals in maintenance shops or associated with excess use of cleaning chemicals
- Chemical exposures associated with road maintenance, paving operations, water/wastewater distribution/treatment
- Building indoor air quality
- Heat stress and cold exposures for employees working outside

¹ The content of this policy and procedure is based upon the following regulations:

- Pennsylvania Title 34, Part VIII, Bureau of Workers' Compensation – Chapter 129, Subchapter D §129.452; Group Self-Insurance Fund's AIPP Requirements
- PennPRIME Workers' Compensation Amended Agreement of Trust 09/13/17; Article 5, Section 5.7



Scope

This policy² applies to all employees, elected officials, and volunteers, and covers all buildings owned, leased, or occupied by the organization.

Purpose

This procedure provides employees with the basic information and procedures for reporting concerns related to industrial hygiene (IH) and indoor air quality (IAQ) in the workplace. When the work environment contains an excess of chemicals, or the temperature and/or humidity are outside of standardized ranges, it can cause injury or illness to employees. Employees might occasionally encounter situations where they are exposed to airborne contaminants. At times, the levels of exposure may exceed recommended exposure limits and create the risk for illness or injury to employees. In order to determine the exposure level, industrial hygiene (IH) surveys might need to be performed.

Program Responsibilities

On the line below, list the job title of the person responsible for oversight of the Industrial Hygiene policy. _____

Management is responsible for providing an indoor environment free of recognized hazards and within acceptable temperature and humidity ranges. Management will also arrange for timely and appropriate investigations of reported concern related to indoor air quality.

Employees are responsible for reporting any concerns to management and for cooperating with any requests of the employer during the investigation of the concerns.

Reporting Concerns Related to IAQ

If an employee has a concern that they believe is related to the quality of the indoor air in their work area, the employee is to immediately notify their supervisor/manager of the concern. The employee should provide as much information related to the concern as possible, including:

- When they first noticed the concern
- If the concern is confined to a particular area or activity
- If the concern is similar to other known chemicals (natural gas, paint thinner, sewer gas, musty odor, etc.)

² The content of this policy is based upon the following regulations:

- Pennsylvania Title 34, Part VIII, Bureau of Workers' Compensation – Chapter 129, Subchapter D §129.452; Group Self-Insurance Fund's AIPP Requirements
- Federal Occupational Safety and Health Administration (OSHA) regulations for Air Contaminants; 29 CFR 1910 Subpart Z, which includes limits for exposure to airborne chemicals.
- American Society of Heating, Refrigerating and Air-Conditioning Engineers (ASHRAE) Standards for Indoor Environmental Conditions and Ventilation; Standard 55-1992 and Standard 62-19



Initial Investigation of IAQ Concerns

When notified by an employee, the supervisor/manager will immediately conduct an initial investigation to verify the information provided by the employee(s) and to see if there is an identifiable source for the concern. The initial investigation will consider potential sources of any odor such as spilled or open containers of chemicals, visible evidence of water intrusion, dry sink or floor drains, or sources near any building fresh air intakes.

If the source of the concern is identified during the initial investigation, corrective actions to control, remove, or limit the source of the concern will be taken as soon as possible. The investigating supervisor/manager will document the concern, the details provided by the employee(s), the identified source for the concern, and the corrective actions taken to address the concern.

Detailed Investigation of IAQ Concerns

When a member believes an industrial hygiene problem is occurring and they do not have the resources to address the problem, they should contact PennPRIME. If the request from the member is approved, PennPRIME will assist the member in contacting an external subcontractor and arrange for the survey to be conducted. The primary contact will be a representative of the member; however, PennPRIME Manager must continue to be kept aware of all major survey activities.

The qualified safety provider will contact the supervisor/manager to review any information gathered during the initial investigation. The safety provider will arrange to physically inspect the area or concern and, if necessary, conduct either real-time monitoring or collect samples to be analyzed by an accredited laboratory.

Industrial hygiene surveys are to be conducted following established methodologies published by the EPA, OSHA, NIOSH, or other standard setting organizations. Professional IH services utilized by the member must involve a safety professional to oversee the project. Examples of qualified safety providers include Certified Safety Professionals (CSP), Certified Industrial Hygienist (CIH), or Certified Occupational Health and Safety Technologist (COHST).

Investigation Report

Due to the potential seriousness of some situations requiring industrial hygiene services, it may be necessary to take immediate administrative action to protect employees when there is a clear and present danger, up to and including the evacuation of an area within a building/facility or the entire building/facility. In such situations, PennPRIME will work with the member to identify the best course of action to protect employees and the public, if applicable.

All reports, documents and pertinent information regarding the IH concern and subsequent survey will be made available to all affected employees.

Following the site visit and any laboratory analysis, the qualified safety provider will issue a report of findings related to the concern. The report will identify the potential sources of the



concern, the results of the laboratory analysis and interpretation of the results, and recommendations for corrective actions. The entity will have the opportunity to ask questions and/or request clarifications on the report and recommendations. Once the final report is provided to the entity, the supervisor/manager will review the report with the employee(s) that raised the concern and provide them the opportunity to ask questions related to the concern.

Investigation Follow-Up

The entity will take the necessary actions identified in the report to address the concern. Once the actions have been completed, the supervisor/manager will follow-up with the employee(s) that raised the concern to verify that the issue has been fully addressed. If the concern returns, the supervisor/manager will repeat the investigation process again.

Recordkeeping

Documents related to an industrial hygiene event will be maintained for ten (10) years. Following the conclusion of the record retention period, all industrial hygiene documents will be archived for 30 years. All events that resulted in a direct employee exposure will be maintained for the length of employment of the exposed employee(s), plus 30 years.