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DATE: January 31, 1994

MEMORANDUM FOR: Diane Manning
NIOSH

FROM: *g* Diantha M. Goo
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SUBJECT: Worker's Family Protection Act

OSHA has regulations to require the employer to install decon facilities for certain regulated chemicals when the airborne concentrations exceed our permissible exposure limits. However, there are no provisions to ensure that contamination is removed from a worker's clothing if we cannot prove an over exposure. This can be a problem since our standards are often set as much by economic feasibility and cost-benefit analysis as they are by scientific evidence of exposure. In addition, our standards presume a 16 hour recovery period and a 40 hour work week which is not the case if the contamination is carried home.

Regarding OSHA's own employees, I have worked in four of OSHA's ten regions and have discussed this with coworkers in the other regions. To the best of our combined knowledge, OSHA does not test its employees' homes or personal vehicles for possible contamination so there is no way of us knowing whether or not there is contamination. Although there has never been a problem with obtaining the correct PPE there has never in my experience been any formal provisions made by the Agency to decon the PPE or equipment we use for sampling after it is contaminated. The sole exception to this is the provision of a vacuum with a HEPA filter which we were told to use after doing asbestos inspections. However, there is no simple way for a CSHO to transport the vacuum, set it up nor to clean it after; as a result, it has not been used. We have pretty much been left to our own devices, professional judgement and personal hygiene comfort level.

OSHA has decon standards for specific chemicals in 1910, subpart Z, and some vague ones in 1910.120. It does not provide these types of facilities for it's employees although we are free to use those, if they are available, of the employers we inspect. OSHA employees use a variety of methods of getting to contaminated

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workplaces and if unable to decon adequately prior to leaving the site could be spreading the hazardous substances to GSA pool cars (used by the entire office) or to their own personal vehicles.

My own personal solution has been to use public laundry facilities or hotel/motel rooms or the office to clean my PPE and equipment. While decreasing the risk to myself, this raises the issue of spreading the problem among the public. I do try to flush the tubs with copious amounts of water after and also to run at least one rinse cycle with nothing in it after I have removed my coveralls but I have not tested to see if this has reduced the contamination to acceptable levels.