

 United States Environmental Protection Agency Washington, DC 20460		1. Directive Number 9285.3-06	
OSWER Directive Initiation Request			
2. Originator Information			
Name of Contact Person	Mail Code	Office	Telephone Code
David Weitzman	OS-200	OERR-IO	382-2180
3. Title Priority for Health & Safety Requirements, Especially Medical Surveillance Requirements for EPA employees who Support OSWER Programs			
4. Summary of Directive (include brief statement of purpose) Requires procedures for protection of OSWER employees and others working on OSWER cleanup activities.			
5. Keywords Safety, cleanups, medical surveillance.			
6a. Does This Directive Supersede Previous Directive(s)? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes What directive (number, title)			
b. Does It Supplement Previous Directive(s)? <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes What directive (number, title) 9285.3-02			
7. Draft Level <input checked="" type="checkbox"/> A - Signed by AADAA <input type="checkbox"/> B - Signed by Office Director <input type="checkbox"/> C - For Review & Comment <input type="checkbox"/> D - In Development			

8. Document to be distributed to States by Headquarters? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
--

This Request Meets OSWER Directives System Format Standards.	
9. Signature of Lead Office Directives Coordinator Betti C. VanEpps, Superfund Documents Coord.	Date 3/1/90
10. Name and Title of Approving Official Don Clay, Assistant Administrator	Date 3/1/90

EPA Form 1315-17 (Rev. 5-87) Previous editions are obsolete.

NOTE: Copies of this document may be obtained from the Superfund Document & Information Center - 382-6940 - Mail Code OS-245..

OSWER OSWER OSWER O
VE DIRECTIVE DIRECTIVE DIRECTIVE



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

MAR 1 1990

OFFICE OF
SOLID WASTE AND EMERGENCY RESPONSE

OSWER Directive 9285.3-06

MEMORANDUM

SUBJECT: Priority for Health and Safety Requirements, Especially
Medical Surveillance Requirements, for EPA Employees
Who Support OSWER Programs

FROM: Don R. Clay *DRC*
Assistant Administrator

TO: Regional Administrators
Regions I - X

One of my first priorities as Assistant Administrator is to impress upon you my commitment to protect the health and safety of EPA employees engaged in hazardous substance, oil spill, and hazardous waste operations. I need not "preach to the choir" about protecting our employees from the suffering caused by illness or injury. This conviction is deeply ingrained in all of us. I would, however, like to focus your attention on the effort that must be expended to obtain and/or retain this protection.

I recognize that your health and safety program faces tremendous competition for the limited staff resources you have available to you. Indeed I contribute to this competition with the challenging goals I have established in the various solid waste and emergency response programs. I would like to make it perfectly clear, however, that I believe it is a priority that you expend the effort needed to assure the health and safety of your employees who are pursuing these programmatic goals. In addition to minimizing the risk of our employees becoming ill or injured, we also will achieve more in the long run by avoiding the productivity losses that inevitably occur in unsafe or unhealthy work situations.

I am sure you are aware that we have been required, since December 1986, to comply with the Occupational Safety and Health Administration's (OSHA's) hazardous waste and emergency response worker protection rule (29 CFR 1910.120). We are also required to comply with Agency health and safety policies contained in the EPA 1440 Directives. You were reminded of these requirements in a July 7, 1987 memorandum (Attachment). OSWER Directive No. 9285.8-02, "U.S. Environmental Protection Agency Health and Safety Audit Manual", is a very detailed guide that you can use to evaluate your Regional health and safety program against the OSHA requirements.

I would like to focus your attention on one of the most important of these requirements: medical surveillance (sometimes called medical monitoring). I am particularly concerned that medical surveillance may not be getting the consistent attention it needs in all the Regions. Here is a brief summary of OSHA's medical surveillance requirements which your program must meet:

- o Employees who may be exposed to hazardous substances, oil spills, or hazardous wastes must be included in the medical surveillance program.

- o The medical exams must be given before the employee is assigned to work where exposures to these substances may occur, at least once every twelve months of the assignment, and at the end of the assignment. Also, exams must be given as soon as possible after an exposure, or after the employee develops signs or symptoms of exposure, to these substances.

- o The exams must include a medical and work history as well as other specific tests that Regional management and the examining physician agree are necessary.

- o Regional management must provide the physician with information about the employee's duties and exposures to these substances.

- o Regional management must obtain a written opinion from the physician of any detected medical condition that would place the employee at increased risk from the assignment.

- o Regional management must keep accurate medical surveillance records. The records must be kept securely and transferred intact whenever there is a change in health providers.

The medical surveillance program is designed to provide a critical watch over the health status of our most valuable resource: our people. Please inform me by April 15, 1990 of the status of the implementation of this program for the employees

engaged in hazardous substance, oil spill, and hazardous waste operations in your Region.

The OSWER contact for additional information about any aspect of your health and safety program for OSWER activities is Rod Turpin, Manager, OSWER's Integrated Health and Safety Program. He can be reached at FTS 340-6745.

Attachment

cc: Waste Management Division Directors, Regions I-X
Environmental Services Division Directors, Regions I-X
Assistant Regional Administrators, Regions I-X
Management Division Directors, Regions I-X
Henry L. Longest II
Bruce Diamond
Sylvia Lowrance
Ronald Brand
James L. Makris
Walter Kovalick Jr.
Thaddeus L. Juszczak, Jr.
John C. Chamberlin
David J. Weitzman
Rodney Turpin