

DEPARTMENT OF  
VETERANS AFFAIRS

# Memorandum

OCT 04 1990

Date:

From: Designated Agency Safety and Health Official (00S1)

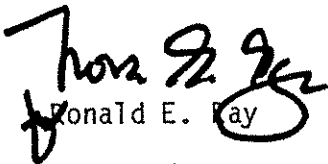
Subj: Hazard Communication Standard

To: Deputy Assistant Secretary for Facilities (08)

1. Attached is a letter from the Occupational Safety and Health Administration (OSHA) regarding the applicability of OSHA's Hazard Communication Standard to airborne anti-corrosive chemicals from steam injection humidifiers. With OSHA classifying these chemicals as consumer products under 29 CFR 1910.1200 (b)(6)(vii), modification of current VA humidification systems is not needed. Also, special notification of building occupants of the presence of these chemicals is not required by OSHA.

2. Although the Designated Agency Safety and Health Official is responsible for the Department's occupational safety and health program, please assist us in communicating this information as appropriate to facility managers. Additionally, during the design phase of new construction, humidification systems that do not require the use of the facility's boiler water should be considered.

3. I have asked Mr. Frank J. Denny, who can be reached at 233-4180/4182, to provide any additional information you may require.

  
Ronald E. Kay

Attachments

DIRECTOR,  
MECHANICAL ENGINEERING SERVICE (088C2)

OCT 11 1990

TO \_\_\_\_\_  
FOR \_\_\_\_\_  
DUE DATE \_\_\_\_\_

U.S. Department of Labor

Occupational Safety and Health Administration  
Washington, D.C. 20210



Reply to the Attention of:

Mr. Ronald E. Ray  
Assistant Secretary for  
Human Resources and  
Administration  
Department of Veterans Affairs  
Room 1175  
810 Vermont Avenue, N.W.  
Washington, D.C. 20420

23 1990

Dear Mr. Ray:

This is in response to Dr. Lewis' letter of October 25, 1989, concerning the applicability of the Occupational Safety and Health Administration's (OSHA) Hazard Communication Standard (HCS) to airborne anti-corrosive chemicals from steam injection humidifiers. We apologize for our delay in providing you with this response.

After reviewing the material provided with your request, we have determined that the standard may not apply to the situation as you described it, since the employees' exposure to the humidifier chemical may not be different than the average consumer using the same chemical as a consumer product. Consumer products are excluded from the standard per 29 CFR 1910.1200(b)(6)(vii) when an employer can demonstrate that the consumer products are being used in the workplace in the same way as normal consumer use, resulting in a frequency and duration of exposure not greater than exposures experienced by consumers.

A hazard communication program would need to be developed, however, for the employees (engineers or others) who were adding the chemical to the ventilation system and therefore, exposed to the chemical as an occupational exposure. And of course, any other employees at these worksites exposed to other hazardous chemicals at the worksite (i.e. chemicals utilized by these employees while on their jobs) would have to be protected by the provisions of a comprehensive hazard communication program.

Hopefully, this has answered your inquiry. Please call John E. Plummer, Director, Office of Federal Agency Programs at (202) 523-9329 should you have any further questions.

Sincerely,

Patricia K. Clark  
Director Designate  
Directorate of Compliance Programs

OCT 25 1989

0051

Mr. John E. Plummer, Director  
Office of Federal Agency Programs  
Occupational Safety and Health  
Administration  
Room N3613  
200 Constitution Avenue, NW  
Washington, DC 20210

Dear Mr. Plummer:

The Department of Veterans Affairs (VA) requests an interpretation regarding the applicability of the Hazard Communication Standard (HCS) to anti-corrosive chemicals which may become airborne from steam injection humidifiers. Do employees working in buildings equipped with this type of humidifier need to be provided hazard notification and training for chemicals required under HCS?

Most VA facilities and private hospitals use the steam injection humidifiers to provide building humidification. Anti-corrosive chemicals are added to the water from which steam is made. These chemicals are used in a manner consistent with normal operations of such systems. Duration and frequency of exposure to the chemicals by individuals in VA buildings equipped with steam injection humidifiers is not greater than exposures in any other building equipped with this type of system. Although the chemicals used to reduce corrosion in the steam pipes have been detected in the air in some VA buildings, the amounts detected were far below exposure limits.

This issue was raised by the manufacturer of an alternative humidification system (Cool-Fog Systems, Inc.) who alleges that the HCS applies in the VA situation (enclosed). VA, therefore, seeks your interpretation on this issue.

I have asked Mr. Frank Denny, who can be reached at 233-4180/4182, to provide any additional information you may require.

Sincerely yours,

ARTHUR J. LEWIS, M.D.  
Arthur J. Lewis, M.D.  
Designated Agency Safety and  
Health Official

Enclosure

cc: 088  
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Executive Communications (101B)

OCT 25 1989

Signed and Dispatched

*Cool-Fog File*

F:kk 10/16/89

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