

# Round Table Discussion 1910.1450 OSHA Lab Hygiene Standard

April 28, 2010

# Statement of the Issue:

- ▶ A recent question on the EEI S&H List Server asked member companies if their labs complied with the OSHA Laboratory Chemical Hygiene Standard 1910.1450.
- ▶ The majority of the responses indicated that they did not believe it applied to the labs at power plants.
- ▶ A few responded that they did comply.

# Defined as Applying to the Lab use of Hazardous Chemicals:

Laboratory Use of Hazardous Chemicals – handling or use of hazardous chemicals in which all the following conditions are met:

- (i) Chemical manipulations are carried out on a “laboratory scale.”
- (ii) Multiple chemical procedures or chemicals are used.
- (iii) The procedures involved are not part of a production process.
- (iv) “Protective laboratory practices and equipment” are available and in common use to minimize the potential for employee exposure to hazardous chemicals.

# AEP Lab Hygiene Policy

**Scope:** This policy applies to all company laboratories where multiple chemical procedures or chemicals are used and where the procedures involved are not part of a production process. Facilities that conduct testing to comply with Environmental Protection Agency or other regulatory agency standards are covered by this policy.

# 1991 Letter of Interpretation to Entergy:

The Agency has interpreted that laboratory activities pertaining to the production of electricity, such as determination of the quality of the process water, would be considered quality control of a production process; therefore, these activities would not fall within the coverage of the Laboratory Standard. Effluent testing would also be considered quality control of production if the results of the test is used as a source of information for process control adjustment. **However**, if the effluent testing is performed solely for the purpose of meeting EPA discharge criteria, this type of analyses would be within the scope of the Laboratory Standard.

# Discussion and Questions:

How does your labs understand this interpretation?

Are they exempt or in complying with the standard? Or...

Does it vary from location to location?

For those complying...what are the challenges?

What are the benefits?