

## Beryllium Rulemaking Advisory Committee

### Meeting Minutes

March 23, 2017

#### Present:

Jose Benito Bocqnegra Yanez  
Debra Corbin  
Stephanie Ficek (Scribe)  
Bill Kalapsa

Dave McLaughlin  
Alden Strealay  
Trena VanDeHey

#### Draft Rule

The group reviewed Oregon OSHA's draft rules for beryllium and the federal side-by-side with the requirements for general industry and construction rules compared. It was noted that we combined requirements for general industry and the construction industry. The group discussed the draft rules with the following concerns:

**437-002-2024 Scope and application** – No concerns

**437-002-2025 Definitions** – No concerns

**437-002-2026 Permissible exposure limit (PEL)** – No concerns

**437-002-2027 Exposure assessment** – No concerns

**437-002-2028 Regulated and restricted access areas** – Dave mention a dental application where filing a crown could be a beryllium work area according to the federal OSHA. This could be an area of concern.

**437-002-2029 Methods of Compliance** – A note of concern in (1)(d) and (e) where is references the beryllium work area, making the requirement only applicable to construction. We will need to change that language so it is applicable to both general industry and construction.

Paragraph (3)(b) references CBD diagnostic centers. The group questioned if there are any CBDs in Oregon. Dave will look into it.

**437-002-2030 Respiratory protection** – No concerns

**437-002-2031 Personal protective clothing and equipment** – Dave noted that Oregon has rules for PPE in construction that should be referenced in this rule.

**437-002-2032 Hygiene areas and practices** – It was suggested that we add “fixed-site” to (5) for clarification so that it will read “When fixed-site showers are required...”

**437-002-2033 Housekeeping** – It was suggested that we refer back to the written exposure control plan in this section. It was noted that we missed rules for disposal. We will add (3) for disposal requirements.

**437-002-2034 Medical surveillance** – It was suggested that we look at language in (5)(c) for employees who work under the required exposure limit.

**437-002-2035 Medical removal** – No concerns

**437-002-2036 Communication of beryllium hazards to employees** – No concerns

**437-002-2037 Recordkeeping** – It was suggested that we ask about the requirement to add the employee's social security number to the record of all exposure measurements.

**437-002-2038 Dates** – It was noted that we are following federal OSHA's timeline.

**Next steps:** Dave will send out the revised draft, highlighting the areas we changed. He will also continue to reach out to the dental industry. He will also send the fiscal impact questions out via email. We will only meet again if we get additional feedback from stakeholders.

**Meeting adjourned:** 3:30 p.m.