

**Testimony of
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To

**House Energy and Commerce Subcommittee on Environment and Climate Change
U.S. House**

Good morning. My name is Tom Grumbles. Thank you for the opportunity to be here today.

I am here to share my experience from 40+ years as a certified industrial hygienist practicing occupational health and safety in the workplace, prior to my retirement in April 2018.

In addition to my direct work experience, I spent many years working with professional organizations focused on industrial hygiene and worker protection. I am a past President to the American Industrial Hygiene Association (AIHA) and the International Occupational Hygiene Association. I also was a founding board member and former President of the Product Stewardship Society. I am also a current board member of the American Board of Industrial Hygiene.

I served in a leadership capacity within industry trade associations as well. Through my years of engagement with these different groups, I grew to understand the practices of the industry as a whole.

What I want to describe here today is what I have seen related to safety data sheets (SDSs) and personal protection equipment (PPE) in the workplace. This is important to me in light of recent trade journal articles questioning the U.S. Environmental Protection Agency's (EPA) ability to protect workers from chemical risks and the misperception that SDSs are not followed and have no effect.

Contrary to press accounts, SDSs have a critical role in the safety of a worker's daily life.

Based on my experience, which I believe to be standard industry practice, this is what happens when an SDS for a chemical is introduced into the workplace. A hazard assessment is developed that informs the need for:

1. Additional training;
2. Workplace labeling;
3. Changes in standard operating procedures;
4. Additional engineering controls; and
5. PPE needs.

And yes, SDSs are made readily available to workers. SDSs are more than just a document to be read. The SDS is a catalyst for hazard assessments that ultimately guide how worker safety and health will be achieved.

In my experience, the SDS development process for any chemical is rigorous and involves multi-tiered reviews -- including research and development (R&D), toxicology, and even transportation. In my view, SDSs have improved dramatically upon implementation of HazCom 2012. This standard utilized the Globally Harmonized System for Classification and Labeling (GHS) to drive content and format, hazard classification, and hazard communication through labels and symbols.

Regarding the effectiveness of PPE used in the workplace to control exposures, regulation requires a hazard determination for PPE selection. Further, “[t]he employer shall verify that the required workplace hazard assessment has been performed through a written certification that identifies the workplace evaluated; the person certifying that the evaluation has been performed; the date(s) of the hazard assessment; and, which identifies the document as a certification of hazard assessment.”

This U.S. Occupational Safety and Health Administration (OSHA) requirement creates an effective PPE selection process that is documented and verifiable. In fact, OSHA statistics support this. The OSHA database of 12 million violations dating back to the 1970s shows less than one percent of violations related to lack of eye protection, lack of general dermal protection, and lack of glove use (or inappropriate glove use), despite the fact that these violations are relatively easy to observe. This confirms that workers are wearing PPE and compliance is likely.

I hope this helps inform the discussion this morning regarding the collaborative relationship between EPA and OSHA in protecting worker health and safety.

Thank you for the opportunity to share my perspective with you this morning.