

SECTION VI

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The rehabilitation of an area affected by a chemical accident involves a complex sequence of activities and a large and multiskilled workforce. The work is generally characterized by risks of accidental injury and potential exposure to chemical and physical hazards. Superimposed upon normally tolerated risks are the consequences of exposure to the contaminant released in the accident.

Large scale activity such as earthmoving, demolition, dredging, skimming, spraying, pumping, abrasive blasting and washing are likely to disturb settled contaminants which may be present at the start of the rehabilitative phase. This disturbance increases the potential for exposure of the workers to airborne contaminants.

The rehabilitation workers have the greatest risk of exposure, both chronic and acute, to the chemical hazards present at the site. The risks will exceed those experienced by the average member of the public, who quite possibly have been evacuated from the area.

The recognition, evaluation and control of chemical and physical hazards which are likely to affect the health or well being of workers encountered in the workplace are the components of industrial or occupational hygiene; whereas analyzing causes of accidents (unplanned events) and designing systems to minimize loss due to accidents is the field of the safety professional.

Elsewhere in this report, the relationship between the source of contaminants and the natural environment is discussed. The nature and concentration of the chemical contaminants changes as they move through the environment from their origin, generally becoming less predictable.

Immediately following an acute chemical emergency, contaminants may be distributed both inside and outside the primary source. The substance may, however, be in storage or in transit to an end user or have been disposed of as a waste. It may be found on or dispersed in water bodies, depending upon its physical and chemical properties. Alternatively, or in addition, it may be found on or under the soil or dissolved in ground water. Variations and combinations of these scenarios may occur and must be taken into account.

Each of these environmental compartments defines a workplace which may be classified as: an open and/or well-ventilated site, a semi-confined, poorly ventilated site or a completely enclosed unventilated confined space. Each category necessitates different and increasingly stringent conditions for acceptable work practices.

The safety professional is an indispensable member of the occupational health and safety team. As described by the American Society of Safety Engineers, the modern safety professional is qualified to

"identify and evaluate the magnitude of safety problems, to determine the causes of accidents or the existence of loss-producing conditions, practices or materials".

Considerable emphasis is directed toward the loss potential of activity including predictions as to where and how loss and injury may occur and determining the means to prevent them (Moloney 1972).

In the following section special attention is given to accidents which may occur during rehabilitation of a major chemical Accident or other release of toxic chemicals. The "workplace" is thus the rehabilitation area and "accidents" refer to incidents subsequent to the Accident that is being rehabilitated.

Accident prevention is an integral program or series of co-ordinate activities directed at the control of personal performance or unsafe conditions (Heinrich et al., 1980; Lees, 1980; McLean 1979),

It entails two main considerations: in the short term the control of personal performance and environment, and in the long term, the improvement of worker awareness of hazards and response to them. Attaining the latter goals requires a program of training, instruction and education. Additionally, the mechanical hazards within the environment and the unsafe actions of persons which precipitated the accident must also be eliminated.

1.1 Indigenous Hazards

Indigenous hazards are generally beyond the control of safety engineering because of the difficulty in anticipating their presence. This is a function of the origin of the site, itself the product of an accident situation or one of neglect.

The indigenous hazards arise primarily due to the chemical ^{natural} of the contaminants. These may be explosive or flammability hazards produced by airborne mixtures of gases or vapours or pools of liquid. Any of these conditions may exist at the site at the time of entry, or may be created following disturbance of soils, structures, or submerged deposits. Considerable attention must be given to ensuring that the presence of these conditions is detected before an accident-producing situation develops. Safety procedures must address the specific course to be followed when an explosive mixture is detected.

Another danger arises from a lack of oxygen in tanks and pits. It should be realized that not only fire but also bacterial action can consume the oxygen in a confined space converting it to the heavier gas, carbon dioxide. Many workers have been asphyxiated when they entered tanks containing food wastes, sludge or activated carbon, all of which support bacterial action.

A further set of indigenous hazards are toxic and irritating chemicals. Not only the chemicals involved in the accident but also those produced, e.g. by fire, must be considered. Dangers of ingestion are fortunately minor with well trained workers who do not take rest and meal pauses in contaminated areas. More serious is inhalation of vapours and gases and skin absorption, especially of traces of irritating chemicals which may coat surface with nearly invisible films. The use of proper protective equipment is essential and must be enforced.

1.2 Introduced Hazards

Introduced hazards are features inherent in equipment and processes which are introduced to the site. These hazards, by virtue of their origins, are amenable to engineering treatment. The ultimate success (or failure) of the safety program carried out at the site will depend on recognizing the full extent of the introduced hazards, and recognizing and controlling the interactions between them and hazards indigenous to the site.

Thermal hazards are likely to arise during operation of gasoline or diesel powered equipment, or use of welding or other equipment which acts as a source of intense thermal radiation. Such equipment can act as a source of ignition in the presence of flammable liquids or explosive mixtures of gases or vapours. As mentioned in the previous section, the necessity to bring such equipment onto the site must be given close scrutiny. Stringent procedures covering its use must be developed.

Pneumatic hazards are associated with use of compressed gases such as welding gases and compressed air or steam. The latter gases may be employed in equipment or processes to be utilized at the site. Tunnelling operations are often conducted under hyperbaric conditions. Special examination of these procedures is required, since explosive mixtures of gases or vapours could be generated within tunnels or shafts following disturbance of contaminated soils. Pneumatic hazards may also exist in equipment or processes operated under low pressures or vacuum conditions.

Electrical hazards deserve special attention and consideration during design reviews and on-site surveys, since the components of electrical systems can constitute sources of ignition. The spark hazard rating of electrical equipment must be assessed thoroughly prior to its admission to a site in which explosive mixtures of gases and vapours may be generated.

Mechanical hazards are those associated with moving parts. Impacts between certain alloys produce sparks which can act as sources of ignition. Materials to be employed where metal-metal contact is likely to occur must be chosen carefully. Mechanical equipment must also be selected for its reliability and serviceability so that breakdowns are few in number, and that decontamination, once the equipment is to be serviced, can be accomplished easily.

Ergonomic hazards are associated with faulty interaction between man and machines, and man and his environment. This category of accident accounts for large numbers of personal injuries and fatalities. Special consideration must be given to these interfaces, especially since heavy reliance may be placed upon the use of personnel protection. This apparel heavy and bulky, and is likely to reduce considerably an individual's mobility, agility and dexterity. The problem introduced by adverse weather conditions, such as extremes of winter and summer must also be considered : specification of work practices.

.3 Hazard Interactions

Recognition of hazards associated with the rehabilitation necessitates an in-depth study of the processes to be employed, and the equipment needed to execute them. The characteristics of the site itself must be known in detail in order to facilitate the planning process. This information can be obtained only after entry and exploratory testing. The safety professional is a necessary participant in planning these surveys. The latter will be discussed in more detail subsequently.

Once the safety hazards present at the site have been identified, process planning can be undertaken. The processes to be considered likely involve the use of heavy equipment. The operating characteristics of the latter must be examined for compatibility with conditions existing at the site. Where explosive mixtures may be present or may develop, caution must be urged, for example, in selection of equipment or processes likely to provide a source of ignition. If use of such tools or equipment is unavoidable, procedures must be specified to ensure that work is halted and

the worksite evacuated prior to development of a potentially explosive atmosphere. Such procedures must also define the conditions and practice followed during re-entry. These should include air monitoring, detection of the source of the gas or vapour, and if possible, a means of preventing recurrence of the situation.

1.4

Acquisition of Data

An accident-prevention program is an on-going endeavour in the industrial context. For this reason an accident-prevention program evolves during a considerable period of time. Activities carried out at a rehabilitation site are, however, generally short-term in duration. In this context an accident-prevention program must be weighted heavily towards advance planning.

The starting point is the acquisition of data concerning the hazardous conditions likely to exist at the site, as well as hazards associated with the processes or equipment to be employed. Analyses of accidents occurring during previous operations, as well as those occurring in similar industries, can be used to establish potential direct causes. Likely external sources of data are the chemical manufacturing and construction industries. The processes of rehabilitation are similar to those utilized at a chemical plant undergoing renovation or a construction site. An added consideration is the fact that extensive use of personnel protective equipment may be required. Relevant accident experience in this area needs to be acquired, especially for adverse climatic conditions.

A second area from which useful data may be obtained is the experience gained from solutions applied to previous accident-producing situations. The relative success of different solutions provides useful knowledge. Where several choices are available.

Another method by which to reduce accidents is to examine each step of the task or process to determine its hazard potential. This technique, for example, can be carried out during rehearsal of a procedure prior to utilization at the site. Accident-producing situations thus identified can be corrected immediately.

Acquisition of data from multiple sources is absolutely necessary in order to generate a database large enough for proper analysis.

1.5

Analysis

Following acquisition, the data are analyzed to determine the likely primary causes of accidents associated with processes to be employed or site activities. These deliberations consider modes of causation of human machine failure and their associated probabilities. The data are employed to generate fault trees. The intent of this analysis is to minimize the probability of failure by modifying individual components or by selecting more reliable alternates, if available. The failure of individual elements can be estimated from the database collected during the acquisition phase. The more comprehensive this database, the greater will be the flexibility to consider alternate courses of action. Individual fault trees generated from human or machine failure may then be combined to investigate the occurrence of multiple failures. If the probability is unacceptably high, the individual contributors must be re-examined to determine where further improvements can be made.

Pertinent accident data can also provide valuable information to the safety professional. Accidents grouped according to causation such as unsafe acts, reasons for unsafe acts, mechanical or physical hazards and underlying causes (managerial or supervisory) provide insight into the deficiencies of procedure, equipment and personnel most likely to be experienced on the site. The long timeframe during which these data were gathered permits examination by hindsight, a luxury unlikely to be afforded during the rehabilitation owing to its relatively short duration.

1.6

Selection of Remedy

Once the likely causes of accidents ^{during rehabilitation} have been identified, the next step is to select a solution from among the available possibilities. The guiding principle in this process is to design the hazard out of the system, if possible. Less satisfactory a means of control is to add warning and protective devices to the basic design. Least desirable is to include hazard controls into training, operating and maintenance procedures.

Suitable solutions can incorporate engineering controls or modification of behaviour, instruction, training and practice and personnel protective equipment. The recommended priority of solution is to consider first the application of engineering controls, where justified as feasible in cost and in consideration of the duration of the project. This decision should be coupled, as appropriate, with training and instruction.

A rehabilitation project may present circumstances in which the use of engineering to control the hazard is prohibitive, or the technology does not permit the use of personnel protective equipment as the first line of defence against safety hazards may be required. This situation would necessitate the implementation and institution of a comprehensive training and educational program to educate the effects of the hazards and the need for personnel protection, and to instruct and ensure competence in its use. The safety professional is an active participant in the design and presentation of such programs at all levels of personnel involved in the project. Training aspects will be discussed in Section 4.

1.7 Implementing the Solution

The next step is to apply the corrective action to the accident or the potential accident-producing situation. Under normal circumstances the role of the safety professional does not extend beyond that of a consultant. Project management should implement the solution in all cases. Accident-producing situations identified at a design review should be corrected by process planners. In the event of an accident or accident-producing situation occurring during on-site work, corrective action should be undertaken by the appropriate first-line supervisor.

The safety professional should avoid unnecessary involvement in disciplinary proceedings, but especially so in the latter situation. This individual must avoid creating the perception of being the enforcer of rules; this is properly the responsibility of the immediate supervisor. The proper perception of the safety professional in the eyes of both management and workforce is essential to operating a successful accident-prevention program and gaining future co-operation at all levels. Supervisory management

in a one-way, results-oriented dialogue with the workforce. That the reverse flow of dialogue does not occur at an equal level is a factor in acknowledging a superior-subordinate relationship. The role of the safety professional must be structured to foster and maintain a two-way flow of dialog with all members of the workforce.

Another mechanism which may provide valuable input is the on-site safety meeting. This might be chaired by the safety professional in isolation from supervisory management. If the safety professional has maintained a posture aloof from supervision, this may improve communication with the workforce and remove barriers toward topics which may otherwise remain suppressed.

2. Rehabilitation-Oriented Industrial Hygiene Programme

Industrial hygiene is defined by the American Industrial Hygiene Association as the

"science and art devoted to the recognition, evaluation and control of those environmental factors or stresses, arising in or from the workplace, which may cause sickness, impaired health and well-being or significant discomfort or inefficiency among workmen or among the citizens of a community".

This unique field encompasses many disciplines, including engineering, chemistry and elements of medicine and toxicology.

Rehabilitation poses special challenges to the industrial hygienist, who normally works in a well-defined production facility. In the latter case contaminants are usually characterized from studies of normal process chemistry. The situation at the site of a chemical incident is, however, vastly different; since the identity, quantity and distribution of the contaminants may be totally unknown.

2.1 Recognition

The foundation of an effective industrial hygiene program is comprehensive knowledge about the contaminants. These data provide the basis for selecting appropriate analytical methods for detection and monitoring, effective engineering controls, personnel protective equipment and a program of medical surveillance.

hazardous materials, including oil and hazardous wastes. In addition, it also provides advice concerning prevention, assessment, containment, control, clean-up, restoration, removal and disposal of these materials. Training courses designed for members of both government and industry are also offered. In addition to providing a response capability, the ERT is also mandated to plan, organize, co-ordinate, implement, and direct a national alerting system to provide rapid dissemination of information on personal safety and hazard assessment to protect public health and personnel during environmental emergency activities (Laforanara and Dorrier, 1980).

Often the information amassed from the preceding sources is sufficient to identify and quantify the substances present at the site. There are, however, as mentioned, situations in which the identity of the contaminants is unknown prior to initial entry. The latter circumstance necessitates considerable advance planning in order to ensure the health and safety of personnel prior to the initial entry into the site.

The most extensive material written to date on the subject of personnel entry into uncharacterized sites of chemical incidents has been prepared by the Office of Emergency and Remedial Response of the Hazardous Response Support Division, United States Environmental Protection Agency. The document, *Interim Standard Operating Safety Guides, Revised*, September, 1982 is unpublished but is employed as a reference during the training course given by the EPA. Much of the material discussed in subsequent sections was inspired by ideas expressed in this document (EPA, 1982) and portions are reproduced in appendixes A and B to this section.

2.2 Evaluation

Evaluation of the hazards posed by contaminants present at the site will vary in complexity depending upon a number of factors, such as the knowledge or ignorance of the identity of the contaminants, their physico-chemical properties, toxicological properties, degree of dispersion, ease of detection, rehabilitation process chemistry, and so on.

Sources of gases and vapours can include open pools of liquid, sludges, liquid-soaked patches of soil, slicks contained on the surface of water, liquids confined under vapour suppressive barriers, and leakage from tanks, vessels, pipes or equipment. Less obvious sources can include dissolved, buried or submerged materials overlain by undisturbed surfaces. Seepage may also be present under some circumstances.

If the identity of the contaminants is known, airborne concentrations can be determined using suitably calibrated instruments. These data are extremely useful in formulating subsequent choice of engineering control equipment, personnel protective equipment and decontamination requirements.

If the identity of the chemical contaminants is not known, special precautions must be taken. One approach is to select a level of person protection to isolate the individual completely from respiratory or skin contact with contaminants. Initial determination of sources of gases and vapours is made using broad spectrum instruments. The latter are respiratory gases, vapours and particulates detected at the perimeter of the site. Subsequent on-going data are used to evaluate the appropriateness of the perimeter boundary and to confirm that doses received by the public are acceptable limits.

The evaluation process should consolidate the previously mentioned factors and consider the potential for exposure of two groups: persons working at the site and the public. Workers at the site, although very close to the source of emission of gases, vapours and aerosols receive the benefit of considerable training in hazard awareness and the protection offered by engineering controls and personnel protective equipment. The public is dependent upon the safe conduct of affairs at the site for its first line of protection. Its second is the presence of an adequate exclusion zone, within which the concentration of contaminants should be below accepted public standards for continuous exposure. The third line of defence against exposure is evacuation, a costly, disruptive and demoralizing activity.

The program to evaluate site hazards must address these concerns and provide adequate response to them.

2.2.1

Background Surveys

The issue of public health and the needs of the rehabilitation plan are addressed initially by conducting a background survey at points surrounding the contaminated area. Data collected upwind from the contaminant plume are used to establish baseline levels. These provide a standard against which all other data can be compared. This reference is used to establish the ultimate success of the endeavour (Turpin, 1983a).

Resources from which the required data are obtained may be numerous. The extent to which information must be pursued is a function of the type of incident and the complexity of rehabilitation. Potentially the most complete knowledge about the contaminants, their normal and extraordinary chemistry, and methods for safe handling and containment resides with the manufacturer. The greater the dispersal into the anthropomorphic and natural environments, the less that is likely to be known about the identity of contaminants.

The process of recognition begins with acquisition of data concerning contaminants likely to be present at the site. Possible sources of information can include technical and medical staff employed by the manufacturer, shipper's records, trade groups, and emergency response organizations sponsored by industry or contained within governments.

There is a growing body of computerized information available through trade associations and response groups which may be extremely relevant to this investigation. Some of the previously mentioned information may be available through these services.

For example, the Canadian Chemical Producers' Association which created the first transportation accident response group, provides both telephone and on-scene assistance, as needed*.

In the United States both the Coast Guard (marine or marine-oriented mishaps) and the Chemical Manufacturer's Association operate 24-hour emergency response centres and also provide information and on-scene assistance. The Coast Guard centre provides both information system and hazard assessment computer system. The latter creates dispersion data for minimizing both flammable and toxic hazards (Cline and Zercher, 1980). Similar efforts are underway in other jurisdictions.

The Environmental Protection Agency in the United States has also established an Environmental Response Team. This group acts as a focal point to offer technical assistance during emergency episodes involving toxic

* See general reference E 4.

Data collected downwind from the source of the contaminant plume are used in conjunction with standards for continuous exposure to establish exclusion limits for the public. Perimeter monitoring is an on-going process since wind direction is not constant. In addition, activities undertaken during rehabilitation are likely to disturb the quiescent status of the contaminants, thereby producing considerable increases in the concentration *gases and vapours*.

Samples are taken at ground level to identify "hot spots" and also in the breathing zone. The identity of individual components of the gas or vapour can be determined by collecting samples using various media and portable pumps, followed by investigative analysis.

Deposited substances including solid materials can become airborne as aerosols, either particulate or liquid phase, due to the action of wind or falling water. The presence of these contaminants can be assessed initially by the use of portable real-time aerosol monitors. Subsequent air sampling employing cassettes containing suitable filtration media coupled to portable air sampling pumps is used to gain specific information about the identity and concentration of individual contaminants.

Under certain conditions explosive mixtures of gases and vapours may be generated. Occurring simultaneously is the possibility of oxygen deficiency. These conditions are likely to develop in areas in which barriers hinder the normal dispersive action of wind. Examples of such conditions include confined spaces such as tanks, vessels, ships' holds, boxcars, silos, poorly ventilated spaces in buildings, sumps, sewers, culverts and natural formations such as gulleys, trenches and caves. Caution is required when entering and surveying any area suspected of possessing these atmospheric conditions.

Tests for explosive gases are important (Weitzman and Jones 1981) but because lack of oxygen may be the only hazard, a specific test for oxygen in the air must also be used. If readings exceed 10% of the Lower Explosive Limit, extreme caution should be exercised. The investigators should leave the area and obtain expert advice if readings approach or exceed 25% of the LEL (Weitzman and Jonas, 1981).

The broad spectrum air monitoring instruments employed during surveys are insensitive to nonvolatile solids and liquids, as well as several gases and vapours. In situations in which the identity of contaminants is not known, air sampling should be supplemented by collection of bulk samples of contaminated soils, liquids, sludges, solids, floating liquids, flowing and stagnant waters, seepage and sediments. Sample leaves and grasses can provide valuable information about surface contamination.

Additional useful information about the site can be obtained from visual observation. Abnormal growth of vegetation may indicate surface deposition or subsurface contamination. Castings from animal burrows provide easy access to subsurface soils. Labels situated on containers provide information about possible contents.

Conditions likely to produce contamination of subsequent investigations due to splashing, contact with unconfined liquids, sludges or solids, so on, should be noted so that appropriate corrective action can be undertaken.

As an outcome of the initial survey, a comprehensive map should be prepared. The latter should locate all pertinent geographic features, man-made structures present on the site. The sketch should also outline location and potency of "hot spots" as well as the boundaries and relative magnitude of airborne and land or water-based contaminant plumes. Location of explosive or oxygen-deficient atmospheres should also be noted.

Data collected by broad-spectrum air monitoring and that arising from the various sampling techniques provides the initial input to process and dispersion modellers, as well as occupational health and safety professionals. In the latter case the information should be sufficiently detailed to justify selection of the level of personnel protection required during subsequent entry.

In certain situations a large number of chemicals is distributed about the site in unpredictable fashion. The identity of all possible contaminants, therefore, may not be ascertained following even extensive collection and analysis of surface samples. In these cases further investigation is required before appropriate remedial measures can be selected by project planners or the requirements of the occupational health and safety program can be defined. Exploration techniques such as drilling depth

radar, earth resistivity, bathymetry, magnetometry and others may be utilized (Garrett and Jerue, 1983; Lord et al., 1980). The logistics of this operation must be planned carefully since equipment employed may provide a source of ignition to explosive mixtures. In addition, disruptive activities such as drilling may expose the operators to toxic materials not identified previously (Franconeri and Spear, 1980).

~~Where~~ appropriate, additional air monitoring should be considered in order to establish a concentration profile of gases and vapours under different atmospheric conditions. Suitable locations include areas either known or suspected of being "hot spots" (Turpin, 1983a). Since the concentration of contaminants is influenced by such atmospheric factors as wind speed and direction, temperature, rainfall, snow cover and possibly cloud cover, considerable variation is likely to occur at a given location. Multiple determinations are required to provide a satisfactory level of confidence about the data.

2.2.2

Routes of Exposure

Toxic substances and hazardous conditions are likely to be encountered by anyone entering the environs of a chemical incident. The toxicological properties of contaminants are the determinants which govern the effects of these exposures upon the unprotected human organism. Toxic substances enter the body by inhalation, ingestion and absorption through broken, or in some cases, intact skin. They may also be destructive to the skin.

These substances exude from the ground or become airborne due to site activity. Some examples are: earthmoving, excavation, demolition, bulking of materials, dredging, skimming, spraying, pumping, abrasive or other blasting and high pressure water cleaning, to name a few. The degree to which the status quo is disturbed influences the potential for worker exposure to airborne contaminants. Liquids' handling exposes the skin through splashing or immersion. Following sufficient intake by ^{absorption} or inhalation, substances may cause various effects up to and including death.

Rehabilitation workers are likely to come into close proximity to sources of toxic materials under controlled conditions. The magnitude of unexpected releases of material should be considerably less than those encountered during the emergency. Examples of such situations include loss of containment in systems handling liquids, gases or vapours, ^{entry} into confined

Spaces, bulking operations, suspension of particulate matter caused by abrasive or explosive blasting, demolition, or high-pressure water cleaning. Additional acute exposure may occur due to splashing or immersion during liquids' handling.

2.2.3

Hygienic Standards

Hygienic standards adopted in many jurisdictions are based upon the Threshold Limit Values (TLVs) recommended by the American Conference of Governmental Industrial Hygienists and contained in "TLVs, Threshold Limit Values for Chemical Substances in Workroom Air Adopted by ACGIH for 1983" from which the following quotations are abstracted (ACGIH, 1983).

"Threshold Limit Values refer to airborne concentrations of contaminants and represent conditions under which it is believed that nearly all workers may be repeatedly exposed day after day without adverse effect". TLVs have been established to provide "protection against impairment of health" or "reasonable freedom from irritation, narcosis, nuisance or other forms of stress". They are recommendations and should be used as guidelines for good practice" and "should not be used as fine lines between safe and dangerous concentrations". "These limits are intended for use in the practice of industrial hygiene and should be interpreted and applied only by a person trained in this discipline".

Three categories of TLVs are specified.

Threshold Limit Value - Time Weighted Average (TLV-TWA) is the "time weighted average concentrations for a normal 8-hour workday and 40-hour work week".

Threshold Limit Value - Short Term Exposure Limit (TLV-STEL) is the "maximum concentration to which workers can be exposed for a period up to 15 minutes continuously without suffering from irritation, chronic or irreversible tissue change or narcosis

of sufficient degree to increase accident proneness, impair self-rescue or materially reduce work efficiency". The TWA-STEL is a 15 minute time-weighted average which should not be exceeded; it may be experienced for no more than four exposures per day, each separated by a minimum period of 60 minutes, provided that the daily TLV-TWA also is not exceeded. The TLV-STEL is not a separate independent exposure limit.

Threshold Limit Value-Ceiling (TLV-C) is the "concentration that should not be exceeded even instantaneously".

If any of the three TLVs is exceeded, a potential hazard from that substance is presumed to exist.

Certain substances are designated "Skin" to refer to the:

"potential contribution to overall exposure via the cutaneous route which includes mucous membranes, and eyes, either by airborne or more particularly by direct contact with the substance".

Mixtures of airborne gases or vapours require special consideration.

When two or more hazardous substances which act upon the same organ system are present, their combined effect rather than that of either individually should be given primary consideration. In the absence of information to the contrary, the effects of the different hazards should be considered as additive. Exceptions may be when there is good reason to believe that the chief effects of the different harmful substances are independent, as when purely local effects in different organs of the body are produced by various components of the mixture".

ACGIH also lists substances in industrial use known to be carcinogenic to man, or to have induced cancer in experimental animals. Carcinogens

listed are those for which a TLV has been assigned and also those for which environmental conditions have not been sufficiently defined to assign a TLV. Those substances in the latter group are subdivided further.

Group 1 No exposure or contact by any route - "respiratory, skin or oral, as detected by the most sensitive methods - shall be permitted". Under such circumstances the rehabilitation worker should be properly equipped to ensure virtually no contact with the carcinogen.

Group 2 Worker exposure by all routes should be "carefully controlled to levels consistent with data arising from animal and human experience. ACGIH also states the criteria by which a substance is judged to qualify as a carcinogen in experimental animals.

Threshold Limit Values have been prepared for approximately 70 airborne chemical contaminants, and several physical agents. They do not cover, however, for most of the thousands of chemicals presently known or in use. Some toxicological data are available through various computerized data bases ^{which} may be adequate to permit specialists to propose a criterion for human exposure during the rehabilitation process. Under these circumstances safety factors should be applied.

The ACGIH also defines Biologic Limit Values in the TLV booklet. These values

"represent limiting amounts of substances (or their effects) to which the worker may be exposed without hazard to health or well-being as determined in his tissues and fluids or in his exhaled breath".

The biologic limits may be used as an adjunct to the TLVs for air or in place of them. Measurement of exposure may be made by analysis of the amount of substance or its metabolites present in body tissues and fluids, hair, nails, blood and urine or exhaled breath. Individual sensitivity can be estimated biochemically from changes in activity of an enzyme or some critical biochemical constituent or physiological function.

Measurement of these responses can provide a superior estimate of the physiological status of the worker.

An indirect determination of the effect of the substance on the body can be made by measuring tissue or organ function. The specific concentration indicating excessive buildup of contaminants or metabolites within the body is not known with any certainty. In addition, the kinetics of accumulation and elimination must be established. Sampling should be undertaken at or beyond the point in time at which an equilibrium concentration is expected. Care must be exercised in collecting the data, since the kinetics influence the interpretation (Klaasen, 1980, Soule, 1978).

Little or no toxicological data exist, however, for many thousands of compounds. This would suggest that the derivation and application of a criterion for human exposure is, at best, based on guesswork.

The appropriate response of the health and safety professional, then, is to design rehabilitative operations and work practices which, to the maximum extent possible, err on the side of safety.

2.3

Procedural Reviews

Once the strategy for rehabilitation has been selected, process planners undertake next to produce detailed worksite procedures for carrying out the project. These should receive careful review by occupational health and safety professionals. Aside from faulty or poorly designed equipment, ill conceived operational and maintenance procedures are the main cause of employee exposure to chemical and physical hazards.

All procedures should cite appropriate reference material in the event that future justification of feasibility is required. This documentation should also identify availability of additional resources such as consultants. Requirements for personnel protective equipment should be specified. Procedures should be prepared and reviewed for clarity (Dalton and Dalton, 1980).

Hazards unrelated to those caused by exposure to the chemical contaminants or process chemicals, such as noise or vibration, are often inherent in the operation of construction or process equipment. These should not be overlooked, despite the natural inclination to devote attention to the chemical contaminants.

Activities conducted in areas of contamination should be restricted to rehabilitation practices or procedures. Those unrelated to the rehabilitation should not be permitted unless absolutely necessary. This policy eliminates unnecessary interaction between contaminants, and processes employed in peripheral activity. A second benefit of this policy is reduced contamination of personnel and equipment.

All procedures should be field tested prior to utilization within the rehabilitation site. This permits the operators the opportunity to gain familiarity with the equipment and to encounter any difficulties inherent in its operation. For example, the use of personnel protective equipment may compromise safe operation. While affording protection to the worker against a hostile environment, this equipment is often bulky, thus tending to reduce manual dexterity. These practice sessions permit review and appraisal by occupational health and safety professionals. As a result, a review may identify an ergonomic problem associated with operation of the equipment, which can be corrected prior to its utilization inside the site.

In situations in which explosive atmospheres may develop, special considerations are required. An example is the use of gasoline or diesel powered excavating equipment. Disturbing the soil could release trapped gases or vapours. One solution is the use of continuous monitoring for explosive mixtures (Muller et al., 1983). Where possible, explosion or nonsparking tools and equipment should be specified (Weitzman and 1981). Another such situation occurs during exploratory drilling. This could release pockets of gas (Franconeri and Spear, 1982). Continuous monitoring for explosive mixtures should also be contemplated in this instance.