NSRP Risk Management Panel Project NSRP Subcontract No. 2018-425

Daniel O. Chute, CIH, CSP BSI EHS Services and Solutions Reston, VA daniel.chute@bsigroup.com

bsi.

May 20, 2019 Minneapolis, MN



**Project Prime/Lead** – BSI EHS Services and Solutions

Project Participants – US Navy, NAVMEDCEN Industrial Hygiene, Portsmouth, VA

<u>Shipyard Participants</u> – Bath Iron Works, Bath ME Newport News Shipbuilding, Newport News, VA Norfolk Naval Shipyard, Portsmouth, VA





### **Description / Background** 2017 OSHA regulation, 29 CFR 1910. 1024, 29 CFR 1915.24 Occupational Exposure to Beryllium and Beryllium Compounds



- Complex health standard with impact on cost and productivity in the US shipbuilding and ship repair industry.
- Ten-fold reduction of the Permissible Exposure Limit (from 2.0 μg/m<sup>3</sup> to 0.2 μg/m<sup>3</sup> of air).
- Defines detailed requirements for medical surveillance, exposure monitoring, exposure control practices, regulated work areas, detailed recordkeeping and training.
- Since issued, many extensions, request for information
- PEL of 0.2  $\mu$ g/m<sup>3</sup> of air is in effect



# **Goals and objectives**

- Define current uses of Be-containing products
- Collect and review existing representative occupational exposure data
- Evaluate abrasive blasting process efficiency (Conducted by Newport News Shipbuilding)
- Define additional air monitoring needs
- Prepare a summary report

Completion Schedule
March 1, 2018 – April 30, 2019



#### **Beryllium Use in US Shipbuilding**

Be = lightweight but strong metal used principally in aerospace and defense

- \* beryllium-copper alloy = electrical and thermal conductivity, high strength and hardness, good corrosion and fatigue resistance, and nonmagnetic properties.
- \* beryllium oxide = excellent heat conductor, high strength and hardness, electrical insulator

**Primary Potential Source of Exposure** - Be as trace element (<0.1% by Wt) in coal and metal slags sold for use in abrasive blasting

# No participating shipyards identified use of welding or abrasive blasting materials classified as BCM

(BCM = Beryllium-Containing Material)





**OSHA Exemption** 



✤For materials with <0.1% Be by weight</p>

**Applies:** 

 Where the employer has objective air monitoring exposure data
 Field Evaluation Air Monitoring Data

Date	Trade	Operation	Abrasive	Exp *	Unit	Space
11/15/2016	Machinist	Hot Work	N/A	< 0.037	µg/m³	Enclosed
11/15/2016	Fitter	Hot Work	N/A	< 0.037	µg/m³	Enclosed
12/6/2016	Lab Tech	Welding	N/A	< 0.052	µg/m³	Enclosed
12/6/2016	Supervisor	Observation	N/A	< 0.052	µg/m³	Enclosed

 Demonstrate employee exposure to Be will remain below Action Level of 0.1 µg/m<sup>3</sup> of air as an 8-hour TWA under any foreseeable conditions.



# **Processes and Affected Trades in Shipyards (Maritime)**

- Abrasive Blasting
- Welding

Reference:

OSHA Final Standard for Beryllium, Table VIII-Federal Register, January 9, 2017; p 2569

## **Shipbuilding Blast Efficiency Study**

- <u>Task 1</u> Created formal test plan which included, but was not limited to, media to evaluate, and validation of current production rate guide.
- <u>Task 2</u> Used real test areas (i.e., tank mock ups, etc.)
- <u>Task 3</u> Conducted air sampling to evaluate exposure control



• <u>Task 4</u> - Correlated production rate and exposure control, as possible, for optimum cleaning efficiency with required Be exposure control

# **Exposure Monitoring**

- Over 2400 air sample results provided from shipyard industry sources.
- New air sampling in three US shipyards
- Evaluation and testing addressed two priority/work categories:
  1. Abrasive Blasting and Surface Prep
  2. Welding, Cutting and Hot Work
- Found potential for Be contact as a "trace" contaminant.
- All current work tested well below OSHA limits



#### Historical Air Monitoring Data for Maritime Welding and Abrasive Blasting

(Sources: OSHA Compliance Data, participating shipyards)

- Over 2000 air sample results reviewed
- Collected over 25-year period, 1993-2018
- Over 70 % of samples were "less than" values
- OSHA historical Be compliance data for Maritime included 925 results





Samples Collected (Source: OSHA Maritime Be Data 2000-2017)



#### **Field Evaluations**

Testing in participating shipyards during representative production work 86 air samples

- Abrasive blasting Garnet, Coal Slag, Olivene JetMag, steel shot
- Welding and Hot Work
- All Be results below OSHA PEL of 0.2  $\mu$ g/m<sup>3</sup>
- 84 of 86 samples were Below Detection Limits
- (0.03 µg/m<sup>3</sup> in two abrasive blast samples)











Reference : Evaluation and Control of Beryllium Exposure in Shipyards

NSRP Risk Management Panel Project NSRP Subcontract No. 2018-425 FINAL REPORT April 2019 Pages 16-18



METAL AND METALLOID PARTICULATES IN WORKPLACE ATMOSPHERES (ICP ANALYSIS)

Method Number:	ID-125G
Matrix:	Air, Wipe, or Bulk
OSHA Permissible Exposure Limits:	Permissible Exposure Limits (PELs) are listed in Table 1 for elements commonly found in industrial environments. This method has the capability of sampling and analyzing more than these elements, the number being limited by instrumental capability, as well as digestion solubility and stability.
Collection Procedure:	A calibrated personal sampling pump is used to draw a known volume of air through a mixed-cellulose ester membrane filter contained in a styrene cassette.
Minimum Recommended Air Volumes:	Time Weighted Average Samples - 480 L Short-Term Exposure Limit Samples - 30 L* Ceiling Samples - 30 L
Recommended Sampling Rate:	2 L/min
Analytical Procedure:	Filters are digested with nitric acid, sulfuric acid and hydrogen peroxide. Dissolution of the elements is facilitated by addition of hydrochloric acid. Analysis is performed using Inductively Coupled Argon Plasma-Atomic Emission Spectroscopy (ICAP-AES).
Detection Limits:	See Table 2
Validation Level:	See Table 3
Precision and Accuracy:	See Table 3
Method Classification:	Validated analytical method
Chemists:	Jerry Septon, Ray Abel, Michael Simmons
Date: Revised:	November, 1988 September, 2002
*	Take 60-L samples when evaluating STEL exposures to beryllium.

Commercial manufacturers and products mentioned in this method are for descriptive use only and do not constitute endorsements by USDOL-OSHA. Similar products from other sources can be substituted.

> Division of Physical Measurements and Inorganic Analyses OSHA Technical Center Salt Lake City, Utah

Sampling & Analysis Methods: OSHA ID 125G



T-ID125G-FV-03-0209-M

BERTELIOW and compounds, as be. METHOD 7102, Issue 2, 15 August 1994						
Be	MW: 9.01	CAS: 7440-41-7	RTECS: DS1750000			
METHO	): 7102, Issue 2	EVALUATION: FULL Is	sue 1: 15 February 1984 Issue 2: 15 August 1994			
OSHA NIOSH ACGI	: 2 µg/m <sup>3</sup> ; C 5 µg/m <sup>3</sup> ; P 25 µg/m <sup>3</sup> /30 m I: not to exceed 0.5 µg/m <sup>3</sup> (suspect card I: 2 µg/m <sup>3</sup> (suspect carcinogen)	in PRC inogen)	DPERTIES: hard, light metal; valence +2; MP 1284 to 1300 °C			
	SAMPLING		MEASUREMENT			
SAMPLER:	FILTER (0.8 μm cellulose ester membrane)	TECHNIQUE:	ATOMIC ABSORPTION, GRAPHITE FURNACE			
FLOW RATE:	1 to 4 L/min	ANALYTE:	beryllium			
VOL-MIN:	25 L @ 2 μg/m <sup>3</sup>	ASHING REAGEN	ASHING REAGENTS: HNO3, 10 mL; H 2SO4, 1 mL			
SHIPMENT:	routine	CONDITIONS:	150 °C until brown fumes disappear; 400 °C to dense fumes of H <sub>2</sub> SO <sub>4</sub>			
		FINAL SOLUTION	1: 2% Na <sub>2</sub> SO <sub>4</sub> /3% H <sub>2</sub> SO <sub>4</sub> ; 10 mL			
STABILITY:	stable	GRAPHITE FURN	GRAPHITE FURNACE: 110 °C dry 20 sec; 900 °C char 10 sec;			
BLANKS:	2 to 10 field blanks per set		2800 °C atomize 18 sec			
		WAVELENGTH:	234.9 nm			
	ACCURACY	BACKGROUND C	BACKGROUND CORRECTION: D2 or H2 continuum			
RANGE STUDIED	ANGE STUDIED: 2.7 to 11.8 μg/m <sup>3</sup> [1] (40-L samples)		INJECTION VOLUME: 10 µL			
BIAS:	• 0.39%	CALIBRATION:	Be <sup>2+</sup> in 2% Na <sub>2</sub> SO <sub>4</sub> /3% H <sub>2</sub> SO <sub>4</sub>			
OVERALL PRECISION (Ŝ <sub>rT</sub> ): 0.064 [1]		RANGE:	0.05 to 1 µg per sample [2]			
ACCURACY:	± 12.42%	ESTIMATED LOD	0: 0.005 μg per sample [2]			
		PRECISION (Sr):	0.008 [2]			

REPVIL IIIM and compounds as Rev METHOD 7102 Jacua 2, 15 August 1994

APPLICABILITY: The working range is 0.5 to 10 µg/m <sup>3</sup> for a 90-L air sample. The method is applicable to ceiling measurements using a 25-L air sample.

#### **EVALUATION OF METHOD:**

This method was evaluated using NTIS Standard Reference Material No. 2675 for Be over the range of 0.1 to 0.4 µg Be/filter (equivalent to one-half to two times the OSHA PEL). Beryllium recovery was 88.2% with a measurement precision, S<sub>n</sub> of 0.008 [2]. This method is an improvement of S339 [3], which was validated over the range of 2.68 to 11.84 µg/m<sup>3</sup> using a 40-L sample. Mean recovery was 106.9% with overall precision of 0.064 [1].

#### REFERENCES:

- Documentation of the NIOSH Validation Tests, S339, U.S. Department of Health, Education and Welfare, Publ. (NIOSH) 77-185 (1977).
- [2] NIOSH Manual of Analytical Methods, 2nd ed., V. 5, P&CAM 288, U.S. Department of Health, Education and Welfare, Publ. (NIOSH) 79-141 (1979).
- [3] Ibid., V. 3, S339, U.S. Department of Health, Education, and Welfare, Publ. (NIOSH) 77-157-C (1977).
- [4] Criteria for a Recommended Standard...Occupational Exposure to Beryllium, U.S. Department of Health, Education and Welfare, Publ. (NIOSH) 72-10268 (1972); and as revised in August, 1977 in NIOSH testimony at OSHA hearing.

Sampling & Analysis Methods: NIOSH 7102



E	Beryllium and Compounds (as Be)
Method Number:	1023
Version:	1.0
Target Concentration:	0.2 µg/m³
OSHA PEL:	$0.2~\mu\text{g/m}^3$ 8-hour time-weighted average (TWA) 2.0 $\mu\text{g/m}^3$ short-term exposure (STEL)
ACGIH TLV:	0.00005 mg/m³ (8-hour TWA) Skin; dermal sensitizer; respiratory sensitizer
Procedure:	Collect air samples by drawing workplace air through a 37-mm diameter, 0.8 micron pore size, mixed-cellulose ester (MCE) filter contained in a closed-face polystyrene cassette, using a personal sampling pump. Collect wipe samples on Smear Tabs. Bulk samples may also be collected. Digest the samples in nitric acid using microwave digestion and analyze by Inductively Coupled Plasma Optical Emission Spectrometry (ICP-OES) instrumentation.
Recommended Sampling Time and Sampling Rate:	240 minutes at 2 L/min (480 L) 15 minutes at 2 L/min (30 L) STEL
Reliable Quantitation Limit:	0.03 µg/m³
Standard Error of Estimate at the Target Concentration:	5.4%
Status of the Method:	Fully validated. This method has been subjected to the established validation procedures of the Methods Development Team.

Sampling & Analysis Methods: OSHA Method 1023

June 2018

Michelle Paradise

Methods Development Team Industrial Hygiene Chemistry Division OSHA Salt Lake Technical Center Sandy UT 84070-6406

1 of 17



#### **Project Accomplishments**

- Summarized current uses of Be-containing products in current US shipyard work.
- Collected and reviewed historical industry occupational exposure data for comparable work with Be-containing products to characterize potential exposures and define effective control measures for work above and below regulatory thresholds.
- Evaluated abrasive blasting process efficiency for control of potential Be exposure during surface preparation and coatings work.
- Conducted air monitoring to validate effective exposure control methods.
- Completed a summary report to fulfill the industry need for Historical Objective Data.
- Summarized best current practices for effective exposure control methods in shipyard work.



#### Summary

- Abrasive Blasting and Welding listed by OSHA for potential Be exposure in Shipbuilding
- No current abrasive blasting or welding materials were classified as Beryllium-Containing Material (>0.1% by Wt) by participating shipyards
- Review of historical air monitoring data offers limited evidence of predictable exposure
- Exposure at or above OSHA PEL appear linked to trace contaminants in blast media
- OSHA Maritime Industry air monitoring data for Be was 99.5% Below Detection Limits (5 out of 925 samples)
- Field evaluations found no exposures at or above OSHA Action Level or PEL
- Recommend elimination of Be-contaminated abrasives in future surface preparation work







