

# **EXPECTATION & REQUIREMENT IN COMPETENT PERSON'S REPORT & SUBMISSION**

Industrial Hygiene & Ergonomic Division  
Department of Occupational Safety & Health

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# SCOPE



- Legislation
- Renewal Requirements & Procedures
- Guidelines on Report Writing
- Common Issues

# LEGISLATION



# LEGISLATION: CHEMICAL EXPOSURE MONITORING



# Occupational Safety and Health (Use and Standards Of Exposure Of Chemicals Hazardous To Health) Regulations 2000

## Regulation 26(1)

- Where an assessment of risk to health indicates that monitoring of exposure is required for ensuring the maintenance of adequate control of the exposure of employees to chemicals hazardous to health, the employers shall ensure the exposure is monitored in accordance with an **approve method of monitoring and analysis**.

# Occupational Safety and Health (Use and Standards Of Exposure Of Chemicals Hazardous To Health) Regulations 2000

## Regulation 26(2)

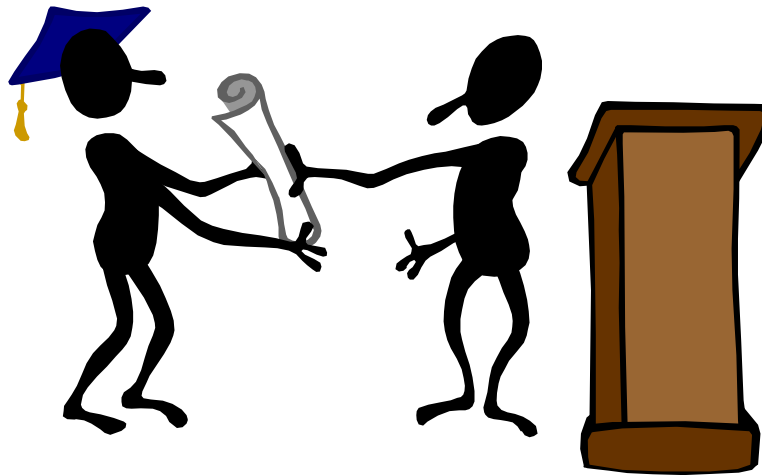
- If an employee is exposed or likely to be exposed to chemicals hazardous to health listed in Schedule II, the monitoring of exposure of employees shall be repeated at intervals of not more than six month or at shorter intervals **as determined by the assessor** and shall continue at this frequency until such time the **assessor is satisfied** that further monitoring of exposure is no longer required.

# Occupational Safety and Health (Use and Standards Of Exposure Of Chemicals Hazardous To Health) Regulations 2000

## Regulation 26(3)

- The monitoring of exposure shall be conducted by a **hygiene technician**.

# RENEWAL REQUIREMENT & PROCEDURE





# Renewal Prerequisite

## Active

List the past 3 years assessment/monitoring/testing information in renewal form

## CEP

Minimum 30 points per year for 3 years registration period

Total 90 points for 3 years

## VALID

Submit renewal application 3 month before expired

# Document for Renewal

## General

Renewal Form

A copy of work  
permit issued by The  
Malaysian  
Government  
(For foreign resident )

## Specific

A copy of full report  
conducted for the past  
twelve (12) months.

CEP document for the past  
3 years

Original competency  
Certificate

# Renewal Methodology

## Report Presentation

- Review report submitted for renewal
- Instruction for amendment (if any).
- Approval after report amendment (if any).

## On-Site Observation

- Appointment for workplace observation
- Review report submitted for renewal
- Approval based on observation result & report review.

## Good Reputation

- Good reputation for at least 3 times registration period
- No misconduct report/comments in relation with assessment conducted
- Approval can be considered without attending presentation/observation

# **GUIDELINES ON REPORTWRITING - CHEMICAL EXPOSURE MONITORING**





## Front Page

- Type of monitoring (initial/additional)
- Place of monitoring
  - Name & address of factory/ workplace
  - DOSH Factory Reg. No.

## Introduction

- Date & Place of monitoring
- Name of HT1 & DOSH Reg. No.
- No. of workers & shift for every work specification

## Specific Objective

- Objective monitoring conducted

## Process Information

- Process involved chemical exposure

## Methodology

- Method used (e.g.: NIOSH method)
- List of equipment used (pump: serial no., medium type, calibrator)
- Selection of worker
- Justification on monitoring time & no. of shift
- Type of monitoring (Personal/Area)

## Monitoring Area Info

Work Area	Work Specification	Type of exposure ( <i>Dermal, inhalation, ingestion</i> )	Number of workers exposed	Number of workers monitored (Personal monitoring)	Exposure level (If any)

## Personal Monitoring Result

Name/ Sample number	Number of blank Sample	Work Area	Work Specification	Monitoring Duration	Exposure Level	PEL	Summary (compared to PEL)



# COMMON ISSUES - CEM





# Common Issues

- Not active
  - Only 1 or no monitoring conducted in past 3 years
- CEP
  - No CEP or not enough CEP for past 3 years
  - Unaware of new CEP format/guidelines
- Missing info & documents, report not according required format
  - Specific date/duration of monitoring not stated in Front Page
  - Company Registration No. not available
  - Form A:
    - not attached & not signed

# Common Issues

- Missing info & documents, report not according required format
  - Calibration certificate:
    - Not attached
    - Not valid during monitoring
    - Monitoring done with equipment cert “out of tolerance”
  - Copy of HT1 Registration certificate not attached
  - Copy of Method not attached
  - Process Flow & Description not available
  - Plan layout
    - Location of sampling workers not pointed

# Common Issues

- Data & Calculation
  - Not included for some chemicals
- Methodology
  - No justification for no. of sampling workers & duration of sampling
  - Chemical sampled  $\neq$  chemical suggested by assessor
    - E.g: Sample hydrocarbon instead of methylene
  - Transport of sample not according to Method
  - Monitoring for Maximum Exposure Limit (MEL) not conducted

# Common Issues

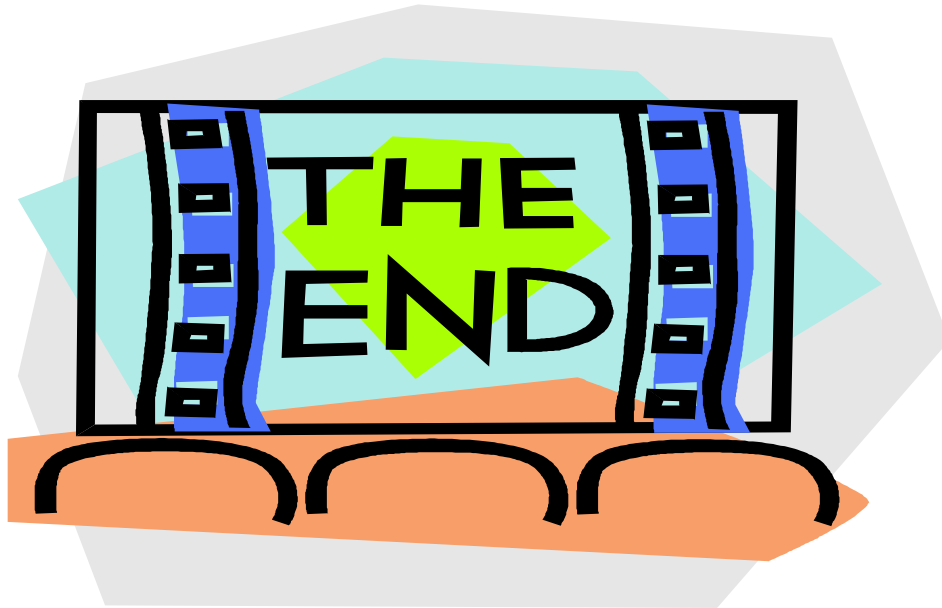
- Methodology
  - Monitoring conducted not according to Method
    - Max/Min Volume Sampling not according to method
      - For NIOSH Method 0500,  $V_{\text{max}}$  recommended = 133L,  $V_{\text{sampling}}$  = 428L
    - Monitoring STEL/MEL benzene using NM1501 (minimum sampling duration required is 25min)
    - Monitoring conducted for only 20min for 3 samples (total 1 hour), balance 420min to calculate  $\text{TWA}_8$  is unmeasured period.
    - Wrong Method:
      - NM 0500 for monitor oil mist instead of NM5026
      - OSHA 7 for monitor MEK instead of NM2500 or OSHA 1004
      - OSHA 7 for monitor toluene (method for vinyl toluene)

# Common Issues

- Discussion & recommendation too general
  - Existing control not discussed
  - Only recommend PPE & not include engineering control
  - Specific type of PPE not recommended
- Inconsistency/typo error in report
  - Result tabulated in Personal Exposure Monitoring Table different from result stated in Data Form

# Common Issues

- Ethiques
  - HT1 not in the monitoring area/workplace during monitoring
  - Monitoring and report conducted by assistant
  - Report not submitted to employer 1 month after completion of monitoring
  - Report not presented to employer
  - Doubt in attached lab result
    - Date of lab result is earlier than date of monitoring



Any Question?  
Thank you for your attention..