

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 consider 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)

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

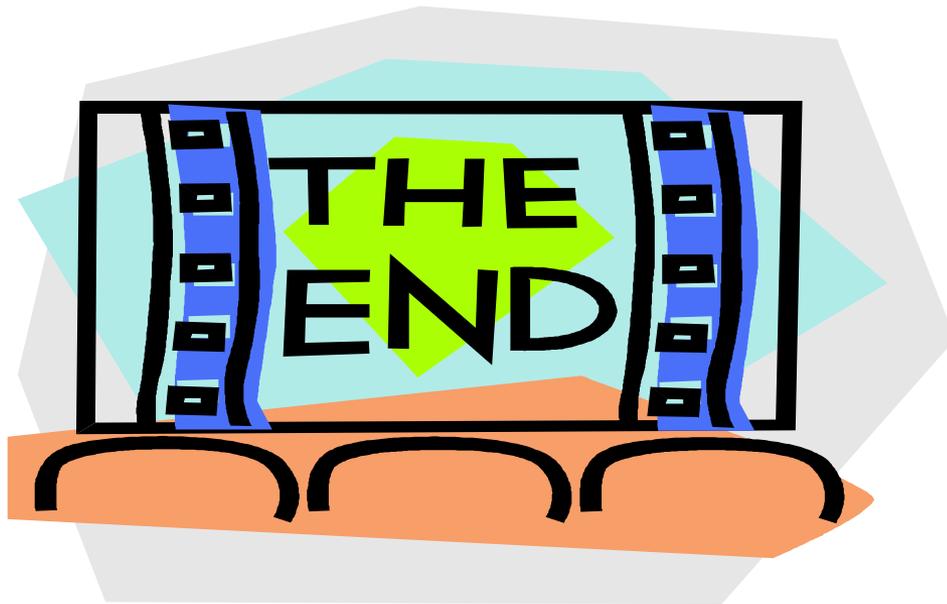
- Methodology
 - Monitoring conducted not according to Method
 - Max/Min Volume Sampling not according to method
 - For NIOSH Method 0500, V_{max} recommended = 133L, $V_{sampling}$ = 428L
 - Monitoring STEL/MEL benzene using NM1501 (minimum sampling duration required is 25min)
 - Monitoring conducted for only 20min for 3 samples (total 1 hour), balance 420min to calculate 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..*