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**Occupational Safety and Health Administration, Informal Public Hearing Regarding  
Occupational Exposure to Beryllium and Beryllium Compounds in Construction and  
Shipyard Sectors**

**Testimony of Meena M. Aladdin, Ph.D.**

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My name is Dr. Meena Aladdin, and I am a health researcher at Public Citizen's Health Research Group. Public Citizen is a nonprofit consumer advocacy group with over 500,000 members and supporters. I have no financial conflicts of interest.

Public Citizen has a longstanding history regarding the regulation of workplace beryllium exposure and petitioned for stronger protections for workers exposed to beryllium in a variety of workplace settings nearly two decades ago. Although the Occupational Safety and Health Administration (OSHA) has taken necessary regulatory measures to reduce the permissible exposure limit (PEL) to 0.2 micrograms per cubic meter of air over an 8-hour time-weighted average, it is vital that it extends *all* protective measures beyond the general industry to shipyard and construction workers to further safeguard their health and mitigate the risk of chronic beryllium disease.

We therefore agree with OSHA's decision to reverse its proposal in a Notice of Proposed Rulemaking (NPRM) on June 27, 2017 to revoke ancillary provisions for shipyard and construction workers and reinstate them to provide further protection in these sectors, as well as with most of the proposed changes of these provisions declared in the NPRM on October 8, 2019. However, we urge OSHA to ensure that the proposed provisional changes are adequately complemented with protections provided in preexisting statutes. In so doing, we ask OSHA to strongly reconsider the elimination of requirements for personal protective equipment (PPE) to ease the risk of dermal exposure in areas with beryllium exposures that potentially exceed trace amounts.

OSHA argues for the removal of PPE requirements in these sectors as abrasive blasting — the primary source of beryllium exposure in the shipyard and construction sectors — produces only trace amounts of beryllium, yielding only about 0.1 percent beryllium by weight. However, this argument fails to address other operations beyond abrasive blasting that may result in beryllium exposures that surpass trace amounts, placing workers at unnecessary risk of beryllium exposure.

Therefore, in accordance with OSHA’s mission to “ensure safe and healthful working conditions for working men and women by setting and enforcing standards,” we ask that the agency restore the PPE requirements for all operations in the shipyards and construction industries.