

Proposed Beryllium Standard Regulatory Alternatives

Alternative	Changes
1a	Regulatory Alternative #1a would expand the scope of the proposed standard to include all operations in general industry where beryllium exists only as a trace contaminant; that is, where the materials used contain no more than 0.1% beryllium by weight.
1b	Regulatory Alternative #1b is similar to Regulatory Alternative #1a, but exempts operations where the employer can show that employee's exposures will not meet or exceed the action level or exceed the STEL.
2a	Regulatory Alternative #2a would expand the scope of the proposed standard to also include employers in construction and maritime.
2b	Regulatory Alternative #2b would update 1910.1000 Tables Z-1 and Z-2, 1915.1000 Table Z, and 1926.55 Appendix A so that the proposed TWA PEL and STEL would apply to all employers and employees in general industry, shipyards, and construction, including occupations where beryllium exists only as a trace contaminant.
3	Under Regulatory Alternative #3, OSHA would adopt a STEL of 5 times the proposed PEL. Thus, this alternative STEL would be $1.0 \mu\text{g}/\text{m}^3$ if OSHA adopts a PEL of $0.2 \mu\text{g}/\text{m}^3$; it would be $0.5 \mu\text{g}/\text{m}^3$ if OSHA adopts a PEL of $0.1 \mu\text{g}/\text{m}^3$; and it would be $2.5 \mu\text{g}/\text{m}^3$ if OSHA adopts a PEL of $0.5 \mu\text{g}/\text{m}^3$.
4	Under Regulatory Alternative #4, the proposed PEL would be lowered from $0.2 \mu\text{g}/\text{m}^3$ to $0.1 \mu\text{g}/\text{m}^3$.
5	Under Regulatory Alternative #5, the proposed PEL would be raised from $0.2 \mu\text{g}/\text{m}^3$ to $0.5 \mu\text{g}/\text{m}^3$. OSHA cannot legally adopt this alternative.
6	Regulatory Alternative #6 would eliminate the engineering and work practice controls provision currently specified in paragraph (f)(2). This regulatory alternative does not eliminate the need for engineering controls to lower exposure levels to or below the TWA PEL and STEL; rather, it dispenses with the mandatory use of certain engineering controls that must be installed above the action level but at or below the TWA PEL.
7	Regulatory Alternative #7 would update the Z tables for 1910.1000, so that the proposed TWA PEL and STEL would apply to all workers in general industry. All other provisions of the proposed standard would be dropped.

Alternative	Changes
8	Alternative #8, which would apply ancillary provisions of the beryllium standard only where exposures exceed the proposed TWA PEL of 0.2 µg/m ³ or the proposed STEL of 2 µg/m ³
9	Monitoring every 180 days when exposure between AL/STEL and PEL
10	Monitoring every 180 days when exposure above AL/STEL and PEL
11	Monitoring every 180 days when exposure above AL/STEL, quarterly monitoring when exposure above PEL
12	No regulated areas, ancillary provisions triggered by PEL or STEL
13	PPE wherever there is contact with beryllium or beryllium contaminated surfaces
14	Medical surveillance would be available to employees exposed above the PEL or STEL even if less than 30 days per year
15	Medical surveillance would be available to employees exposed above the AL even if less than 30 days per year
16	Eliminate test for beryllium sensitization in medical surveillance program
17	Requires employers to offer annual sensitization testing instead of biannual testing
18	Eliminate CT scan requirement in proposed rule
19	Increase CT scans to annually instead of biannually
20	All periodic exams in medical surveillance moved to biannually
21a	Extend medical surveillance to workers in construction and shipyard industries if they meet requirements of proposed standard (above PEL or STEL for 30 days or more, etc.) All other provisions would not apply.
21b	Extend medical surveillance to workers in construction and shipyard industries if they meet requirements of current standard consisting of above PEL (2.0 µg/m ³) for 30 days or more, etc. All other provisions would not apply.
22	Remove requirement for a medical removal program