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OSHA

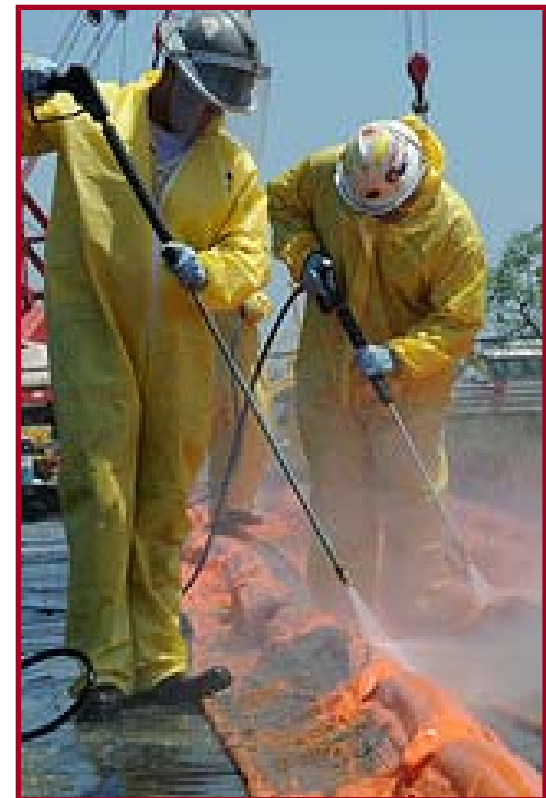
adds value to business,  
work and life.

# OSHA Exposure Assessment Onshore and Offshore in the Deepwater Horizon Oil Spill Response

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# OSHA Activities

- Ensure that workers have safety and health training and protection necessary to avoid injuries and illnesses
  - Technical Assistance to UC and Agencies
  - Conduct Interventions
  - Develop and implement exposure assessment and sampling strategy



# OSHA Worker Exposure Assessment and Sampling Activities

- Information collected on employers, workers, and work tasks (standard form)
  - Hazards
  - PPE
  - Controls
- Sampling Strategy
  - Three (3) work zones
    - Onshore
    - Near shore
    - Offshore
  - Sixteen (16) specific work tasks



# Sampling Tasks

1. Manual scraping
2. Sump and pump/vacuum
3. Manual removal of oil materials
4. Low pressure flushing
5. Manual sorbent application
6. Manual cutting
7. In-situ burning
8. Vacuum truck, vacuum pumps, portable skimmers
9. Oil mop
10. Recovery of oil from groundwater
11. Marsh-non shore cleanup operations (SCAT)
12. Skimming
13. High pressure cleaning
14. Manual removal of solid tar balls
15. On shore support
16. Float support

# Developing the Sampling Strategy

- Data from previous incidents
  - Consultation with SLTC Laboratory
- Data from this incident
  - Crude Oil Vapors
  - Weathered Oil
  - Headspace Analysis of Bulk Samples
  - Air Chemistry (NOAA)

# Preliminary Sampling Data

## Crude Oil Vapors

- SUMMA canister sampling of “fresh” crude oil vapors at spill site
- Samples taken directly above the oil surface and also on vessel surfaces
- Most substances were non-detectable
- Detected substances: 2-400 ppbv
- Concentrations were lower at vessel deck level compared to water surface
- Water soluble compounds go into solution (> 1 mile of seawater)
- Less soluble, smaller MW compounds rapidly volatilize into atmosphere



# Preliminary Sampling Data

## Weathered Oil

- Samples analyzed by two separate laboratories
- Lower MW hydrocarbons were non-detectable (BTEX, etc.)
- Lowest MW hydrocarbon detected was C14
- Naphthalene was detected using more sensitive method at 0.1 mg/kg oil (just above the detection limit)





# Bulk Headspace Analysis

- Used qualitative mass spectrometry to evaluate volatiles in bulk samples of weathered oil
- At 80°C ( 176°F) no volatiles were detected in headspace
- Test re-run at 120°C (248°F)
  - C14 to C23 were major components of headspace
  - Minor components included C-6 to C-10 compounds
  - Demonstrated that volatile compounds were not expected to be released from weathered oil

# NOAA Air Chemistry Sampling

- OSHA partnership with NOAA to conduct air chemistry sampling
  - P3 aircraft
  - NOAA vessels
    - Air Canisters
- Confirmed OSHA sampling strategy (qualitative basis)



# Compounds Monitored

- Chemical Exposure Assessments
  - Oil
  - Dispersants
  - Cleaning agents
  - Combustion products
- Physical Hazard Assessments
  - Noise
  - Heat



# Sampling Methods

Sample	Method	Media	Comments
VOC-Diffusive (BTEX, etc.)	OSHA 1005	SKC 575-002 Diffusive Sampler	Crude oil
VOC-Active (BTEX, etc.)	OSHA 1005	SKC 226-01 Charcoal Tube	Crude oil
Petroleum Distillates	OSHA 48	SKC 226-01 Charcoal Tube	Crude oil
Heavy Aliphatics & Aromatics	Qualitative GC/MS	SKC 590-100 Ultra I Sampler	Crude oil
Propylene Glycol	OSHA PV2051	SKC 226-57 XAD-7 OVS Tube	Dispersant
2-Butoxyethanol	OSHA 83	SKC 575-002 Diffusive Sampler	Dispersant (prior to 5/2010)

# Sampling Methods

(continued)

Sample	Method	Media	Comments
Formaldehyde	OSHA 1007	Assay Tech ChemDisk	In-situ burning
Oil Mist	PC2121	PVC Filter	Decon/pressure washing (initial sampling)
Glycol Ethers (2-butoxyethanol)	OSHA 83	SKC 226-01 Charcoal Tube	Decon cleaning agent
Benzene Soluble Fraction	OSHA 58	Glass Fiber Filter	Decon/pressure washing

# Direct Reading Methods

- VOC: Photo-ionization detector (PID)
- 4-gas: CO, H<sub>2</sub>S, %LEL, %O<sub>2</sub>
- Benzene, Toluene, Xylene, TPH, NH<sub>3</sub>: CMS/Detector Tubes
- Noise: SLM, Dosimeter
- Heat Stress: WBGT Meter

# Coordinated IH Effort

- Tasked to perform 3<sup>rd</sup> party/verification sampling of spill response operations
  - OSHA Health Response Team
  - Regional and Area Office Staff
- Daily coordination meetings with IH Technical Leads
  - Resources are limited
  - NIOSH, USCG, OSHA, EPA, BP and Contractors
  - Response to complaints or incident reports
  - Excursions
  - Operations
- Did not necessarily use same sampling and analytical methods between Agencies



# Where to Find the Data?

- OSHA and USCG Data
- Sample Types
  - Personal
  - Area
  - Direct Reading
  - Integrated (Laboratory Analysis)
- Compared to lowest OEL

The screenshot shows the OSHA website interface. At the top, there is a header for the 'UNITED STATES DEPARTMENT OF LABOR' and 'OSHA'. Below this is a navigation menu with links for 'Home', 'Workers', 'Regulations', 'Enforcement', 'Data & Statistics', 'Training', 'Publications', 'Newsroom', and 'Small Business'. A secondary menu includes 'OSHA QuickTakes', 'Newsletter', 'RSS Feeds', 'Print This Page', and 'Text Size'. The main content area features a banner for 'Keeping Workers Safe During Oil Spill Response and Cleanup Operations' with sub-links for 'Oil Spill Home', 'Worker Rights', 'Chemical Exposure', 'Hazards', 'Training', 'News Releases', 'Worker Protection', and 'OSHA Activity'. The 'Chemical Exposure' link is circled in red. Below the banner is the article 'Assessing Worker Exposures', which discusses OSHA's efforts in monitoring health and safety hazards during oil spill response. The article mentions a 'Sampling Strategy' document that identifies activity zones and tasks. A sidebar on the right titled 'Sampling Data' lists links for 'OSHA Combined Sampling Results [XLS]', 'Laboratory Analysis Results [XLS]', 'Direct Reading Results By Site [XLS]', and 'Noise Monitoring Results By Site [XLS]'. Below this, it lists 'US Coast Guard' and 'BP' data sources, and 'Others' including 'EPA', 'NOAA', and 'AirNow'. At the bottom, there is a link for 'MSDS Material Safety Data Sheets' and a photograph of workers in a hazardous environment.



# OSHA Sampling Summary

Operation	Air Sample Results
Shore Cleanup	2032
Vessel Booming and Skimming	2490
In Situ Burn	95
Decon	3773
<b>TOTAL</b>	<b>8390</b>

# Reporting Limits (RL)

- Reporting limit is the mass of an analyte that the SLTC Lab can quantify.
- Reporting limits ( $RL_{\text{mass}}$ ) are determined by the laboratory.
- Reporting Limits were calculated for air sampling results
- $RL_{\text{air}} = RL_{\text{mass}} / V_{\text{air}}$

Example:       $RL_{\text{mass}} = 0.01 \text{ mg}, V_{\text{air}} = 0.2 \text{ m}^3$   
                     $RL_{\text{air}} = 0.01 \text{ mg} / 0.2 \text{ m}^3 = 0.05 \text{ mg/m}^3$

- Reporting limits ( $RL_{\text{mass}}$ ) are set by the laboratory.
- Air volume ( $V_{\text{air}}$ ) is determined by field personnel.
  - Sample Time x Sample Flow rate

# Shore Cleanup

- Tar ball removal
- Oiled sediments, vegetation, and debris removal
- Manual sorbent application and removal
- Pollution investigation
- Sump & pump/ vacuum trucks



# Shore Cleanup Results

- 2032 Sample Results
  - 2027 (99.8%) of the samples were below the reporting limit
  - Samples detected
    - Coal tar pitch volatiles (benzene soluble fraction) (4), Oil mist (mineral) (1)
  - None of the chemical exposures exceeded any occupational exposure limit

# Vessel Booming & Skimming

- On-water operations
- Various skimming techniques
- Oil patrols
- Environmental sampling
- Boom application, removal, tending



# Vessel Booming & Skimming



# Vessel Booming and Skimming Results

- 2490 Sample Results
  - 2469 (99.2%) of the samples were below the reporting limit
  - Samples detected
    - Benzene (1), Xylene (2), Ethyl benzene (1), Toluene (2), Trimethyl benzene (1), Coal tar pitch volatiles (benzene soluble fraction) (2), Oil mist (mineral) (3)
    - Propylene glycol (9)
  - None of the chemical exposures exceeded any occupational exposure limit

# In-Situ Burning

- On-water destruction of “fresh” oil
- Upwind end of contaminated area ignited and allowed to burn to down-wind end





# In-Situ Burning



# In Situ Burning Results

- 95 Sample Results
  - 95 (100%) of the samples were below the reporting limit
  - None of the chemical exposures exceeded any occupational exposure limit
  - Elevated CO (peak) concentrations measured on igniter boats equipped with gasoline powered engines

# Decontamination



- Vessel decon
- Boom decon
- Equipment decon
- Wildlife decon
- High and low-pressure washing

# Decon



# Decon



# Decontamination Results

- 3773 Sample Results
  - 3600 (95.4%) of the samples were below the reporting limit Samples detected
    - Xylene (6), Ethyl benzene (1), Toluene (4), Petroleum distillates (1) (Coal tar pitch volatiles (benzene soluble fraction) (61), Limonene (49), Oil mist (mineral) (48)
    - Sodium hydroxide (2)
    - Sodium chloride (1)
  - One of the chemical exposures exceeded an occupational exposure limit
    - 1177 ppm Toluene exposure to worker conducting boom repair

# Personal Protective Equipment

- PPE programs were reviewed and guidance provided
- Respirators not required, with the exception of:
  - Operations at the source (respirators used according to direct reading measurements)
  - In-situ burning (escape respirators available if necessary, rec. by NIOSH)
- PPE used mainly for skin protection
- Necessary to balance PPE requirements with heat stress issues

# Lessons Learned

- Improved coordination between laboratory and field personnel
  - Ensure sampling times (i.e. volumes) are adequate to ensure reporting limits are below appropriate OEL
- Use diffusive samplers whenever possible
  - Less manpower needed to collect samples
  - Less disruptive to workers
- Improve coordination between field personnel and data management personnel
  - Quicker feedback of sampling reports to field planners



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