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[OSHA Limited Access](#) > [DSTM Limited Access](#) > [Beryllium Medical Monitoring](#) > March 24, 2005 Memo

March 24, 2005

MEMORANDUM FOR: ALL OSHA EMPLOYEES

THROUGH: JONATHAN L. SNARE  
Acting Assistant Secretary

SUBJECT: Update on the Pilot OSHA Beryllium Medical Monitoring Program

OSHA is committed to protecting the health and safety of its employees. In early 2000, OSHA, through its Office of Occupational Medicine (OOM) in the Directorate of Science, Technology, and Medicine (DSTM), began investigating the need to provide a Beryllium Medical Monitoring Program to supplement the existing Compliance Safety and Health Officer (CSHO) Medical Examination Program. A pilot beryllium medical monitoring program was developed that designated eligibility for participating in the medical monitoring plan. Further efforts were then undertaken to develop this monitoring program. As part of these efforts, we developed and distributed extensive education and outreach tools to our staff. After completion of these preparations, the Agency implemented the program in April 2004. The program provides beryllium lymphocyte proliferation tests (BeLPTs) for current OSHA employees who have participated on inspections of industries in which beryllium is known to be used.<sup>1</sup> Testing began in August 2004. This memorandum provides a status of the program to date.

The Office of Occupational Medicine developed the program that includes the availability of BeLPTs to eligible OSHA staff in Federal field and national offices. Although it may be impossible to identify the exact circumstances of when and where an individual's exposure to beryllium may have occurred, program eligibility was extended to OSHA staff who participated on inspections of industries where beryllium was known to be used.<sup>2</sup> To help OSHA employees make informed decisions about participation, a print-out of OSHA staff with associated beryllium sampling data on specific inspections was provided to Regional Administrators. The program implementation included: an educational and outreach program to inform our staff on a variety of issues related to beryllium; the criteria for participation in the program; and information on the BeLPT itself.

As of March 15, 2005, three hundred and two (302) employees have requested a BELPT and 271 BeLPTs have been completed. There are an additional 31 employees who still have not made arrangements to have their blood samples drawn. Of the 271 employees who have completed testing, 10 individuals, or 3.7%, had confirmed positive results<sup>3</sup> for sensitization to beryllium. A relatively recent article reported a range of beryllium sensitization of 2% to 19%<sup>4</sup> in studies of workers in jobs such as nuclear weapons production, machinists, and production of beryllium-containing ceramics, and alloys. As discussed in the Beryllium Lymphocyte Proliferation Test informational brochure, *having an abnormal BeLPT does not imply that one has or will develop Chronic Beryllium Disease.*

OSHA continues its long standing policies and practices to protect and monitor health of compliance staff. We are committed to make every effort to address the concerns of those who have tested positive for beryllium sensitivity. The Office of Occupational Medicine has contacted the beryllium-sensitized individuals to provide information and in-depth consultation regarding further medical evaluation, workers compensation rights and procedures, and appropriate accommodation through the CSHO Medical Examination Program.

In addition, we continue to offer the BeLPT to eligible employees who originally decided not to participate in the

program. The education materials developed as part of the program are still available through the Office of Occupational Medicine, and through a link in the "In Focus" section on the OSHA Intranet home page or at <http://intranet.osha.gov/bemedical.html>. These materials were developed to enable individuals to make informed decisions about participation in the pilot program. A set of 5 informational brochures<sup>5</sup> cover a variety of issues related to the health effects of beryllium exposure and the BeLPT.

A webcast about the Pilot OSHA Beryllium Medical Monitoring Program can be viewed via the same intranet link mentioned above. In the webcast, Dr. Don Wright and Doug Goodell, Directors of the Offices of Occupational Medicine and Human Resources, respectively, present important information about the program and introduce an animated video segment that demonstrated how the BeLPT detects sensitization to beryllium. (If you have problems viewing the webcast, contact the OSHA IT Help Desk for assistance at 202-693-2424.) Participation in the testing program is voluntary. If you decide that you want to participate in the testing program, you can print the required consent forms from the "Pilot OSHA Beryllium Medical Monitoring Program" web page.

We value the health of all OSHA employees. In this regard, although we have completed the testing of employees who requested the BeLPT, the pilot program continues for those employees who would like to participate in the testing program.

If you have any questions, or if you now wish to be considered for testing, please contact your Regional Administrator or National Office Director; or you may contact Dr. Don Wright in the Office of Occupational Medicine at (202) 693-2323.

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<sup>1</sup> Prior to implementation of the pilot program, the BeLPT was provided to OSHA staff on a case-by-case basis due to reasonable concerns about potential exposure.

<sup>2</sup> Most exposures to beryllium occur in the workplace. However, there are documented cases in which beryllium-sensitization and/or Chronic Beryllium Disease have occurred in person with no known occupational exposure.

<sup>3</sup> Confirmation positive results mean that an initial abnormal BeLPT has been verified by at least one additional abnormal BeLPT. This verification procedure greatly reduces the chance that the initial test result was a false positive. A confirmed positive BeLPT indicated that a person is sensitized to beryllium. Having an abnormal BeLPT does not imply that one has or will develop Chronic Beryllium Disease (CBD). Further medical evaluation beyond the BeLPT is required in order to determine if a person has CBD.

<sup>4</sup> Maier, LA, "Genetic and exposure risks for chronic beryllium disease". *Clinics in Chest Medicine* 2002; 23: 827 - 839.

<sup>5</sup> Further information about the health effects of beryllium may be found in the five informational OSHA brochures:

- Beryllium and Chronic Beryllium Disease
- Monitoring for Beryllium Disease
- The Beryllium Lymphocyte Proliferation Test
- Diagnostic Work-up for Chronic Beryllium Disease.
- Potential Benefits and Adverse Consequences of the Beryllium Lymphocyte Proliferation Test

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