AIHA Comments on the U.S. Army Corps of Engineers (USACE) Safety and Health Requirements Manual (EM 385-1-1)

Docket Number: COE-2019-0015

January 23, 2020

R.D. James
Assistant Secretary of the Army
(Civil Works)

Dear Mr. James:

The American Industrial Hygiene Association® (AIHA) offers the following comments in response to the U.S. Army Corps of Engineers’ (USACE) request for comments regarding the USACE Safety and Health Requirements Manual (EM 385-1-1).

- Appendix Q (Definitions): Add the following definition: “Board for Global EHS Credentialing: Created by the American Board of Industrial Hygiene (ABIH), the Board for Global EHS Credentialing (BGC), is the premier global credentialing body for professionals who protect the health of people and the environment. We elevate expectations of professionals in their respective fields through our rigorous, reliable and valid credentialing process. Our credentials demonstrate our Diplomates’ commitment and ability to practice at the highest level. For additional information, visit [https://ehscredentialing.org/](https://ehscredentialing.org/).”

- Section 1 (Program Management, General): Add language emphasizing that individuals who are certified by professional credentialing organization(s), such as the American Board of Industrial Hygiene, are expected to adhere to the credentialing organizations’ code of ethics, which serve as minimum standards for professional behavior.

- Section 6 (Hazardous and Toxic Agents and Environments): Under 06.A.01. “Exposure standards”, make the following changes: “For the purpose of this document, the applicable standard is the most recently published Occupational Exposure Limit (OEL).”
Background on AIHA
AIHA and our members have a reach that extends to millions of people, with solid credibility that is built from 81 years of service to the occupational and environmental health and safety community. Specifically, AIHA has 8,500 members who represent a cross-section of industry, private business, labor, government, and academia. We maintain 68 active Local Sections, more than 50 volunteer groups and have partnership agreements with governmental and nongovernmental organizations representing the full spectrum of worker health and safety vocations. Finally, we have several award-winning publications, a strong social media presence, and host conferences where thought leaders from a variety of industries gather to share new information and answer practical questions on specialized health and safety topics. For additional information, please visit www.aiha.org.

Conclusion and Next Steps
AIHA thanks you for the opportunity to comment upon this request for request for comments regarding the USACE Safety and Health Requirements Manual. We look forward to working with you to help achieve our common goals of protecting workers and their communities. For additional information, please contact Mark Ames at mames@aiha.org or (703) 846-0730.

Respectfully,

Kathleen S. Murphy, CIH
President
AIHA