

Health and Safety Executive	Operational Circular
<i>Field Operations Directorate</i>	OC 38/2(REV)
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Open Government Status	Fully Open
Author Unit	

To
FCG Specialist Inspectors

SPECIALIST INSPECTOR REPORTS

This OC, based on THSD Minute, THSD/SPRU/INF/2/92, describes the purpose, production and life span of Specialist Inspector Reports (SIRs). It replaces OC 38/2, and Supplements 1 and 2.
Appendix 1 - sample SIR Introductory statement
Appendix 2 - sample SIR double column format
Appendix 3 - sample SIR Title Page

Specialist Inspector Reports

1 Specialist Inspectors, in the course of their work, acquire a substantial amount of information and expertise about workplace hazards. Much of this is used in the preparation of official HSE Guidance Notes and formal advice. However, other material which might be less developed could contain useful ideas and be helpful to people involved in health and safety. Such material could also stimulate technical debate on problems and their solutions and encourage others to come forward with ideas and practical improvements. SIRs are designed to publish this material, possibly providing information prior to the production of more specific, formal guidance.

2 Every year FOD A1 write to FCG SSIs for items for the estimate of FOD demands on DIAS. Any proposed SIRs should be included in the return for that FCG. Specialist Inspectors who wish to produce a SIR should therefore discuss the project with their SSI as early as possible.

3 SIRs have a 'life' of only 2 years from the date of their publication and authors should consider this point when preparing drafts. For the same reason, SIRs should not be cited as references in any other published guidance.

Authorship

4 The quality and technical accuracy of SIRs remain the responsibility of the author. Whenever 2 or more people have collaborated in the production of a SIR, one of them should be identified as the 'lead' author and be nominated as the contact for enquiries about the SIR.

5 The author is responsible for the SIR from its inception, throughout all consultations and stages of drafting, until a final draft is agreed.

6 The purpose of SIRs is to provide interested parties outside HSE with factual information and the observations and interpretations of Specialist Inspectors. However, because this information has no formal legal status, an Introductory Statement [see Appendix 1], the format of which has been approved by the HSE Solicitor's Office, must always be included in a Report.

Consultation

7 Although SIRs are essentially THSD publications, consultation with other interested parties is still necessary.

8 It is the responsibility of the Head of Unit (HoU) to ensure that the author has consulted fully on the Report, particularly with FOD and Policy Branches, and that this consultation is fully documented and recorded on file.

9 SIRs should have Head of Branch authorisation before submission to SPRU.

Presentation

10 Authors should present SIRs in double column format [see Appendix 2] and as described below:-

- 1) single type-spacing should be used;
- 2) paragraphs should be numbered;
- 3) pages should be numbered;
- 4) illustrations should be diagrammatic wherever possible since good reproduction of photographs is difficult to achieve and results are often indistinct;
- 5) each SIR should begin with a title page bearing the author's name and giving a summary of its contents (see Appendix 3);
- 6) the title page should be followed by a contents page;
- 7) each SIR should end with a conclusion in which its recommendations are summarised; and
- 8) the SIR should be type-corrected and prepared for printing before forwarding to SPRU.

Publication

11 The final draft should be forwarded under file cover, via the HoU, to SPRU. A typist's original copy should be sent, not a photocopy. It should **not** be hole punched.

12 The author should suggest the number to be printed. Initial print runs will, however, be limited to 1000 copies.

13 Once authorisation to publish has been received from the Head of Branch, SPRU will allocate a Report Number to the document and will arrange printing.

Distribution

14 Library and Information Services (LIS) will ensure that copies are lodged with the HSE Public Enquiry Point. Copies are free and are available on request from LIS.

Publicity

15 SPRU will arrange with LIS for a Press Release, and for articles to be placed in the HSE Newsletter and 'Express' announcing publication of SIRs. Publication of new SIRs will also be announced via the HSE News Bulletin Service. These articles are all subject to approval by the Director, Technology and Health Sciences Division.

16 Authors who wish to extend the publicity for a SIR with articles in the Technical Press should ensure that they liaise with DIAS, Policy Branches and their HoU in the preparation of any material for external publication. SPRU need not be involved.

Withdrawal of SIRs

17 As noted in para 2, a SIR has a 'life' of 2 years from date the of publication. At the end of this period, SPRU will make the necessary arrangements with LIS for the SIR to be withdrawn. The remaining stocks will be transferred to the author's Unit, and the HSE publications list will show the SIR as "out of print".

18 Subsequent enquiries for a withdrawn SIR will be directed to the author's Unit. Depending on the level of remaining stocks and consideration of the currency of the information provided, an item may be supplied or, exceptionally, a photocopy provided.

19 At the time of a SIR's withdrawal SPRU will ask the appropriate HoU to review it and consider its future. Perhaps in consultation with the author, the HoU should decide if the SIR should be revised/updated or be converted to a priced publication.

Cancellation of instructions

20 OC 38/2 and OC 38/2 Supplements 1 and 2 - cancel and destroy.

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ASI headings

Prints and publications: reports: specialist inspector reports.

APPENDIX 1 (para 6)

The Health and Safety Executive employs a wide range of qualified and experienced Specialist Inspectors who, in the course of their work, acquire a substantial amount of

information and expertise about workplace hazards. Much of this is used in the preparation of official HSE Guidance Notes and formal advice. However, other material which might be less developed could contain useful ideas and be helpful to people involved in health and safety. Such material could also stimulate discussions about problems and their solutions and encourage others to come forward with ideas and practical improvements. Specialist Inspector Reports are designed to publish this material.

Enquiries regarding this publication should be addressed to:-

Health and Safety Executive
Information Centre
Broad Lane
SHEFFIELD S3 7HQ

Tel: 0742 892345
Telex: 54556
Fax: 0742 892333

APPENDIX 2 (para 10)

hot dry summer the drivers may operate from mid-morning to late evening, possibly working more than twelve hours in any day. Most farms organise their own harvesting, and exposures to dust although on occasions high, are of much shorter duration. The major contractors in this work tend to operate efficient modern machinery with airconditioned driver's cabs. Some air-conditioning systems are very efficient at removing larger dust particles but may still allow respirable particles into the interior of the cab. Cabs in themselves may not be the complete answer to reduction of exposure though they provide the basis for fitting an efficient dust filtration system which could include other benefits of air conditioning such as cooling. Individual farms may have modern equipment but on occasions. the combine harvesters are of older design with the operator seated in the open air. (see further reading: PM74).

12. Drivers of combine harvesters seated in the open air are frequently exposed to total inhalable dust levels approaching 40mg/m³ and sometimes higher, largely

Respiratory protective equipment is not normally worn by these operatives.

15. Grain drying operators are often responsible for reception of the crop from the delivery trailer; this work may lead to high levels of dust exposure, although a well designed reception area can reduce dust levels considerably. Grain drying is an operation, following harvesting, whereby the moisture content of product is reduced to make it acceptable for the market. The operation is particularly necessary during wet harvesting periods. Highest personal exposures were found around 17 mg/m³ but the average was about 5 mg/m³. Those workers involved in grain drying have only variable access to appropriate respiratory protective equipment.

16. A further source of exposure to grain dust in agriculture is at feed milling and mixing operations. On occasions dust levels during these operations may become elevated, with background concentrations reaching 50 mg/NP on occasions. However 8 hour time-weighted average exposures for

depending on weather conditions.

Enclosed airconditioned cabs dramatically reduce such exposures with total inhalable dust levels rarely exceeding $1\text{mg}/\text{m}^3$ at the operator.

13. Combine drivers often wear forms of respiratory protective equipment and the ventilated helmet respirator is becoming increasingly common. Respiratory protective equipment must be worn correctly and for the powered type, maintenance and charging facilities must be available.

14. Attendant to the harvesting operation is a tractor and trailer with its driver. Exposures for this type of work are intermittent and normally below $10\text{mg}/\text{m}^3$ but dependent on many factors including wind direction and dryness of the crop.

operators rarely exceed $5\text{mg}/\text{m}^3$ and in a recent survey 75% of results indicated personal exposures below $2\text{mg}/\text{m}^3$. These unexpectedly low exposures are a result of operators staying away from obviously dusty areas during process runs and also the situation where the plant only operates for limited periods of time on each occasion. It is important for operators to avoid even very short term high exposures.

17. Mills are used most frequently in the winter months and in a majority of cases exposures only occur for a few hours in any one week. In cases where sheep and cattle feed is being produced dust exposures may occur for as little as an hour per week. Pig farms often have a greater need for feed production and the potential for higher personal exposures exists in

APPENDIX 3
(para 10(5))

OCCUPATIONAL EXPOSURE TO GRAIN DUST
BY
A M PHILLIPS

SUMMARY

Exposures to grain dust are reviewed in this Specialist Inspector Report. Exposure information is presented for the agricultural environment, involving harvesting, transport and grain drying. Dust exposures in maltings, mills and grain storage are described and finally facilities for import, export and major grain transfer are discussed. The report mentions some elements of control relating to grain dust exposure. It is hoped the information will be of use to those involved in making necessary assessments under the COSHH regulations.

