



Purpose This document outlines roles and responsibilities in evaluating and controlling occupational health risks to protect workers in accordance with OSHA, AKOSH, and ConocoPhillips Occupational Health Standard requirements.

In scope / Out of Scope

In Scope	Out of Scope
All work activities under operational control by COPA and contractors on COPA assets.	All work activities out of operational control.

IHEAP development and completion

Responsibility for IHEAP development and completion.

COPA IHEAP	Contractor IHEAP
COPA IH is responsible for IHEAP development and completion for COPA assets and organizations in accordance with the COP Occupational Health Standard .	Contractors are responsible for evaluating and documenting their own health exposures for work completed on COPA assets. Evaluations must be made available to COPA HSE upon request.



NOTE: For IHEAP development guidance, see the [ConocoPhillips Industrial Hygiene Exposure Assessment Plan Guideline](#).

IHEAP information requirements

The IHEAP must include at least the following information:

- Identified agents that present an adverse health exposure risk or are listed in Table 1 of the COP Occupational Health Standard
- All similar exposure groups (SEGs) with potential exposure to identified agents
- Tasks performed by a SEG with potential adverse exposure to an agent
- Qualitative exposure assessment risk ranking of each SEG/Agent/Task/OEL combination
- Quantitative data evaluation of each SEG/Agent/Task combination to determine the number of IH samples required and compliance with the OEL
- Completion status of IH samples needed for each exposure risk profile (i.e., SEG/Agent/Task/OEL)
- Date of the review or update, reviewer, and summary of changes

IHEAP updates

COPA IH must review and update the IHEAP:

- Annually, no later than February 15th of each calendar year,
- When a new exposure to an agent is identified, or
- When there is a significant change to a similar exposure group (SEG), Occupational Exposure Limit (OEL), or exposure task that requires modification of the annual sampling plan.



Excluding a Table 1 agent from IHEAP

A **Table 1 agent** may be excluded from the IHEAP when the following criteria are met:

- It does not present a health exposure risk.
- The exclusion documentation includes:
 - Identification of the agent(s)
 - Explanation for exclusion
 - Supporting documentation, if available
 - Name of person performing the exclusion determination
 - Date of exclusion
- The exclusion is reviewed and updated at least every 5 years, or when a change in the workplace affects the exclusion.

Annual IH sampling plan development

The COPA IH and contractors develop annual IH sampling plans using the IHEAP **and stakeholder input**. The sampling plans include:

- Number of IH samples planned for the year
- Agents to be analyzed (e.g., noise, benzene)
- Sample type (e.g., personal, area)
- Limit type (e.g., TWA, STEL)

Annual IH sampling plan submission

The COPA IH and High Exposure Contractors must submit annual sampling plans:

COPA IH	High Exposure Contractor
Submits IH sampling plan in Cority by Feb 15 th	Submits <i>previous year and current year's IH sampling plan</i> to the COPA IH by March 15th

NOTE: High Exposure Contractors are defined as:

1a. Contractors classified as Risk Rank III/IV, *or*

1b. Contractors with an Exposure Incident on COPA assets in the last 3 years *and*

2. Are scheduled to perform work on COPA assets during the current year.

Interpreting exposure monitoring results

The COPA IH or contractor will interpret monitoring results without regard to PPE.

If monitoring results are	Then
< 50% of OEL	Acceptable: No action required.
≥ 50 to < 100% of OEL	Potential exposure: More monitoring required.
≥ 100% of OEL	<ul style="list-style-type: none"> • Evaluate effectiveness of current controls, including PPE, and modify if necessary. • Implement additional controls if necessary. • Conduct additional monitoring to evaluate effectiveness.



Notify workers of monitoring results

The COPA IH or contractor must **notify** workers of exposure monitoring results:

- Through written communication
- Within 15 working days after receipt of monitoring results, unless a more stringent regulatory requirement exists



NOTE: If monitoring results exceed the OEL, the communication must specify corrective actions being implemented to ensure exposure levels are reduced below the OEL.

Occupational exposure limits (OEL)

The governing OEL must be determined in the following order:

1. [ConocoPhillips OELs](#), if available.
2. ACGIH Threshold Limit Value (TLV) in the absence of a ConocoPhillips OEL.
3. **Contact** COPA IH if none of the above exist.



NOTE: If the regulatory OEL from AKOSH or OSHA is more stringent than the ConocoPhillips OEL or the TLV, it shall be used as the governing OEL:

- [Alaska OSHA \(AKOSH\) Permissible Exposure Limit \(PEL\); Table Z-1-A](#)
- [OSHA PEL; Table Z-1, Z-2, and Z-3](#)

See Figure 1: Governing OEL Determination:

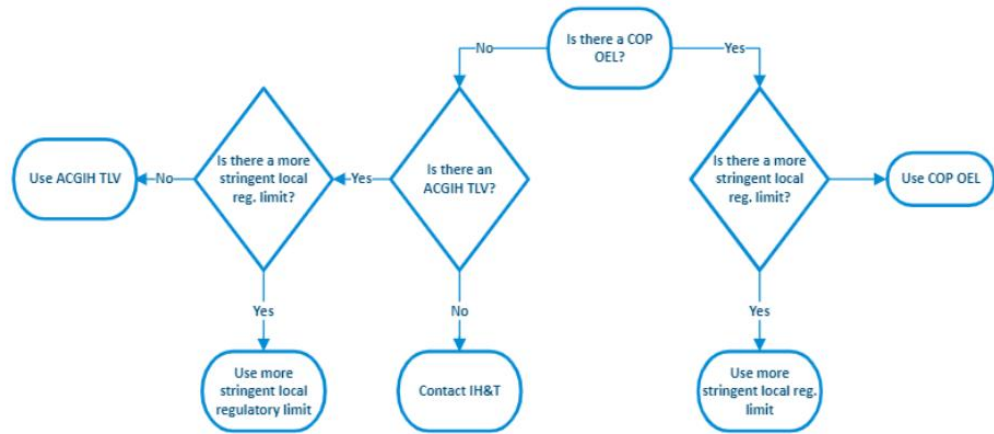


Figure 1: Governing OEL Determination

Medical surveillance programs and recordkeeping

The COPA IH or contractor **manage** stressor-specific medical surveillance programs and maintain records.

For questions about inclusion in a medical surveillance program, **contact** the COPA IH or contractor supervisor.