



One Regulators Approach to Managing Hygiene Hazards

Paul Foley

Team Leader- Specialist Inspector of Mines- Western Australia

#### The Western Australian Mine Industry

- In 2022 adopt WHS Model style Regs
  - WHS Act 2020
  - WHS (mines) Regs 2022
- Commodities include
  - Iron ore
  - Aluminium
  - Coal
  - Nickel
  - Copper-Lead-Zinc
  - Gold
  - Manganese
  - · Rare earths
  - Mineral sands
  - Uranium
  - Tin-Tantalum-Lithium
  - Construction materials
  - Diamonds
  - Salt
  - Talc

- Jan 2020 (pre-Covid)
  - ~500 mine operations
  - ~100,000 onsite mine workers
- March 2022
  - ~627 mine operations
  - ~160,000 onsite mine workers
    - (industry wants another 24,000)







## **Evolution of hygiene management in WA mines**

1970's and 1980's	Early 80's	2010's	2017	2022>
Inspectors conducted 'spot' sampling to determine compliance	<ul> <li>Based on site knowledge inspector issued a sample "quota" for testing.</li> <li>Sample results required submission to inspectorate via "CONTAM" database</li> <li>Formalised requirements for "samplers" and "sampling methodology" to improve sample integrity</li> <li>Standardised job descriptions and location codes introduced</li> <li>Sample quota numbers evolved to be more statistically based</li> </ul>	Risk based hygiene management plan required.  Statistical based sampling with adjustments permitted based on risk  Still predominately a sampling plan  All samples results directly submitted electronically into database	Health and Hygiene Management Plans (HHMP) for all minesites introduced. Focus on management of hazards and verification of controls. Industry-Regulator computer interface (SRS) upgraded to include; • HHMP submission • Includes biological samples • Sample plan submission with background statistical checking • Sample result submission • Auto generation of Exceedance and requirement to investigate • Auto reminders for outstanding tasks • Provides statistics	HHMP to evolve to HMP requirements in WHS legislation adopted in WA  Little change to HMP requirements but now to include all "health" hazards eg heat stress, psychosocial as well as agents such as chemical, dust and noise.  Will include ability to submit health monitoring reports

#### What is expected in an HMP?

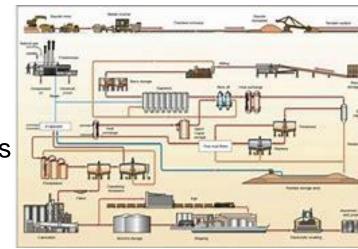
- Prepare and Submit Health Management Plan (HMP) that includes
  - Description of the operation
  - Identification of "health" hazards at all stages of operation and the controls
  - Health Risk Assessment (HRA) may include "investigative" sampling
  - Identify SEG's
  - Determine verification of control effectiveness strategies eg inspection, test, sampling, audit, audiometry, biological monitoring, medical examination
  - Submit sampling plan based on expectation that sufficient samples collected to include top 20% with 95% confidence
  - Additional plans e.g. Fibrous mineral management plan, Noise control plan

#### What is expected in an HMP (1)

Describe Operation Identify Assessment Verification of Controls Improvements Identified

#### Description of operation

- Principal function e.g. exploration, quarry, process plant
- Status of operation e.g. new, reopening of suspended activities, expansion of existing facilities, continuation of normal operations
- Location, activities at site (a schematic flowchart may assist), techniques and controls, size of operation
- Basic geology e.g. principle mineral(s), contaminants in ore and waste, likelihood of harmful or flammable gases, chemically unstable minerals
- Process chemicals used or created. Temperature and pressure of processing



#### What is expected in an HMP (2)

Describe Operation Identify Assessment of Controls Improvements Identified

- Identify Hazards during
  - Exploration
  - Mining
  - Processing and stockpiling
  - Ancillary/Support Services





- Identify the engineering, administrative and PPE controls
- Document hazards and controls

### What is expected in an HMP (3)

Describe Operation Identify Assessment Operation Operation Improvements Identified Operation Operation Identified Operation Op

#### **Assess Risk**

- Define parameters used to assess risk and risk acceptability
- Can use corporate method or AS/ISO 31000
  - Must be appropriate for size, scope and nature of operation
- Determine Similar Exposure Groups (SEGs)
  - Not employer groups or individual task groups- don't get to granular
- Risk Assess each SEG for the hazards
- Document in the Health Risk Assessment (HRA) with controls in place for inclusion in submission

			CONSEQUENCE										
			Probably not Carcinogenic to humans (IARC- Cat4) or causes minor Imitation	Not classifiable as Carcinogenic to humans (IARC-Cat3) or causes irritation, headache, nauses, shortness of breath, erythema Temporary Hearing Loss (Threshold Shift)	Possibly Carcinogenic to humans (Gat2b) or causes temporary incapacitation, or dermatitis, dizziness, poor coordination Permanent hearing loss/impairment	Probably Carcinogenic to humans (Cat2a) Permanent incapacitation/ sensitisation, liver or kidney damage. Significant Permanent hearing loss/impairment	Carcinogenic to humans (Cat1) Reproductive effects, Death, Deafness						
			Insignificant	Minor	Moderate	Major	Catastrophic						
	Always <10% of OEL			low	Low	medium	medium						
sure	Consistently <50% of OEL and 0% of all samples above OEL	<50% of OEL and 0% of all samples above		low	medium	medium	high						
Likelihood/ Exposure	Consistently <50% of OEL and <5% of all samples above OEL	Possibly could occur	low	medium	medium	high	Unacceptable						
Likel	Consistently 50-100% of OEL or >5% of all samples above OEL		medium	high	high	Unacceptable	Unacceptable						
	Consistently >100% of OEL	Almost Certain to occur	medium	High	Unacceptable	Unacceptable	Unacceptable						

### What is expected in an HMP (4)

Describe Operation Identify Assessment of Risk Verification of Improvements Identified

#### Verify the effectiveness of controls

- Determine verification of control effectiveness strategies eg inspection, test, sampling, audit, audiometry, biological monitoring, medical examination
- Submit sampling plan based on expectation that sufficient samples collected to include top 20% of exposures with 95% confidence
  - · Regular and representative sampling
  - Mines are dynamic processes therefore "past performance no guarantee of future outcomes"

Size of group (N)	<6	<6 7-8		12-14	15-18	19-26	27-43	44-50	>51	
Minimum # of measured employees (n)	n=N	6	7	8	9	10	11	12	14	

- Include Additional plans e.g. Fibrous mineral management plan, Noise control plan
- Submit results to DMIRS via SRS
- Conduct (Statistical) analysis of results
- Present overview in annual report(s)

## What is expected in an HMP (5)

Describe Operation Identify Hazards

Assessment of Risk

Verification of Controls

Improvements Identified

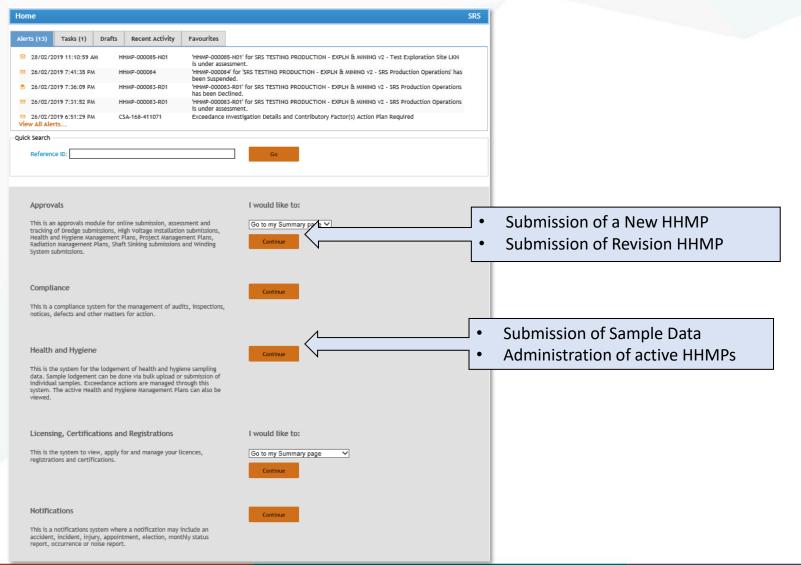
#### **Improvements**

- Confirm and document controls that are effective
- Identify what additional controls are required
- Conduct exceedance investigation and report to Regulator in timely manner
  - No different to an incident or accident
- Summarise and present in annual report(s)

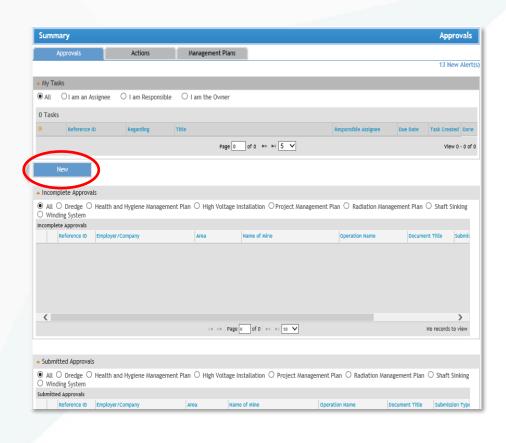


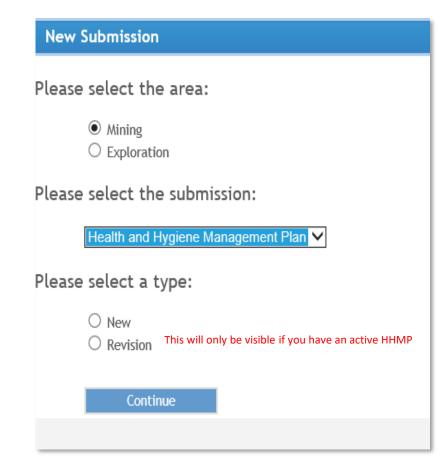


#### **HMP Submission screen-SRS**

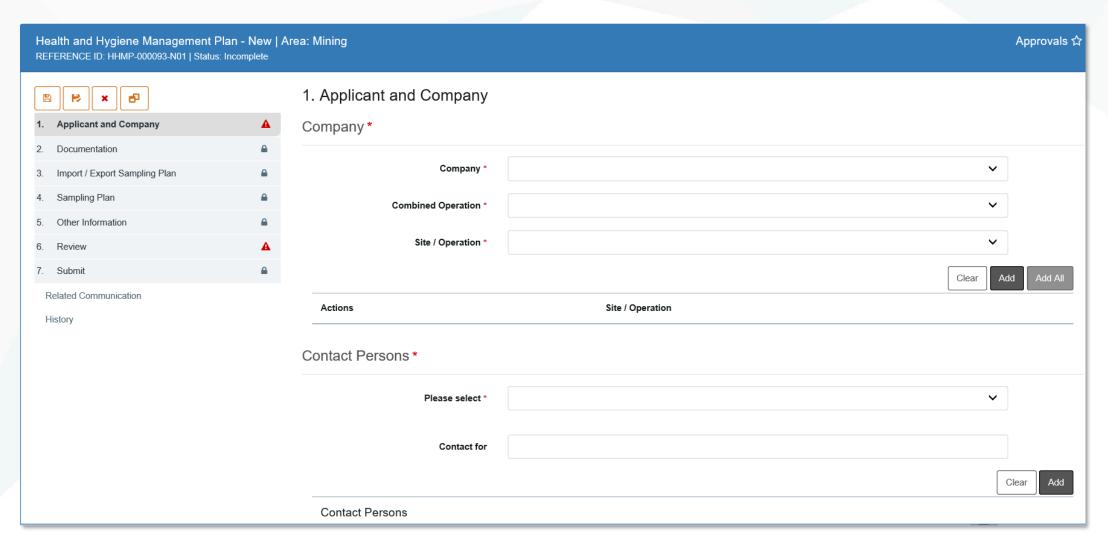


#### Submission of a NEW or Revision HMP

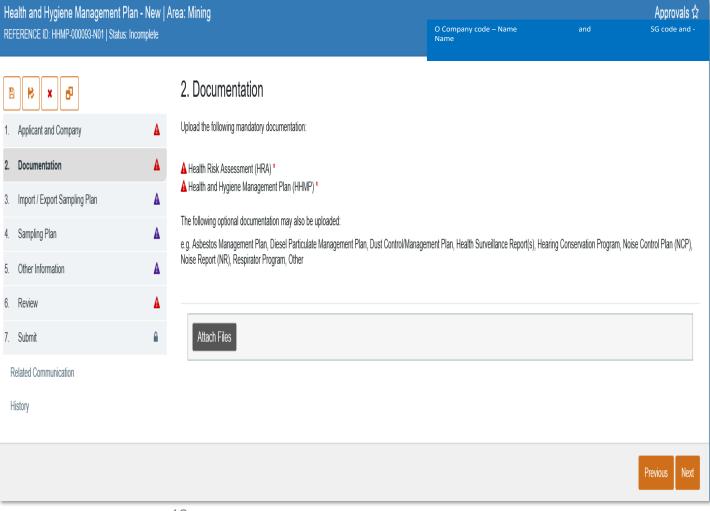




#### **HMP Wizard- Entire Site details- or auto fills**



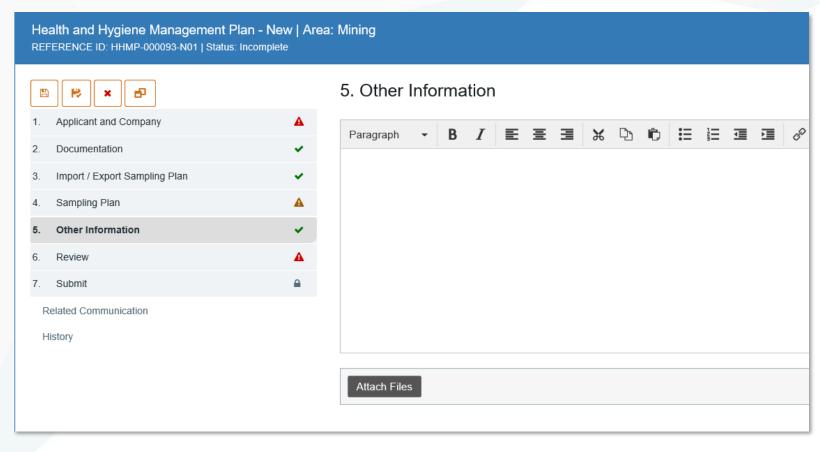
#### **HMP Wizard- Attach Documents**



#### **Documentation Hints:**

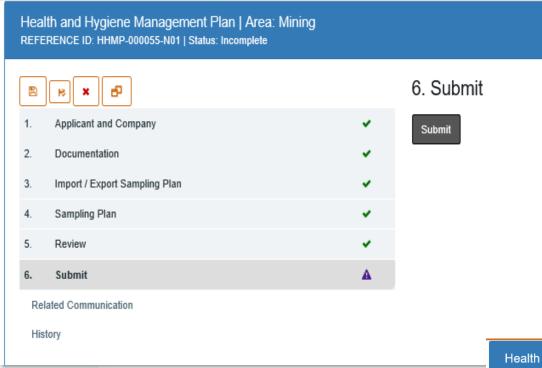
- Red triangles indicate incomplete fields – Mandatory information has not been provided.
- Current Noise Reports and Noise
   Control Plans MUST be submitted
   at submission of the first Annual
   Review, however if due for a new
   noise report in the next few years,
   consider attaching the current one,
   as it may be requested by the
   reviewing inspector.

### **HMP Wizard- Any other Information added**



 This is a free-text field for use of any information that you wish to link to this HHMP submission.

### HMP Wizard- Error checking and submit



- An inspector will receive a task to review and advice may be provided for improvement, if necessary.
- Upon acknowledgement it is deemed compliant
- Valid for five years or until change in risk profile

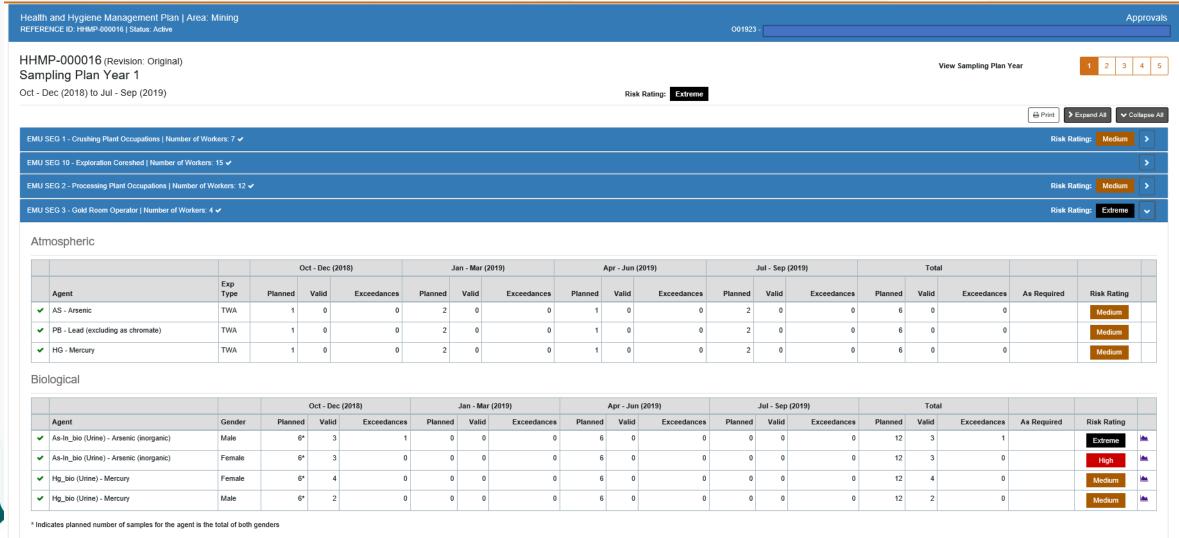
Health and Hygiene Management Plan | Area: Mining REFERENCE ID: HHMP-000055-N01 | Status: Under Assessment

Thank you. HHMP-000055-N01 successfully submitted.

The outcome of the review will be provided electronically. If you do not consent to being provided an electronic copy, please contact the Department.



## **HMP Sampling Plan**



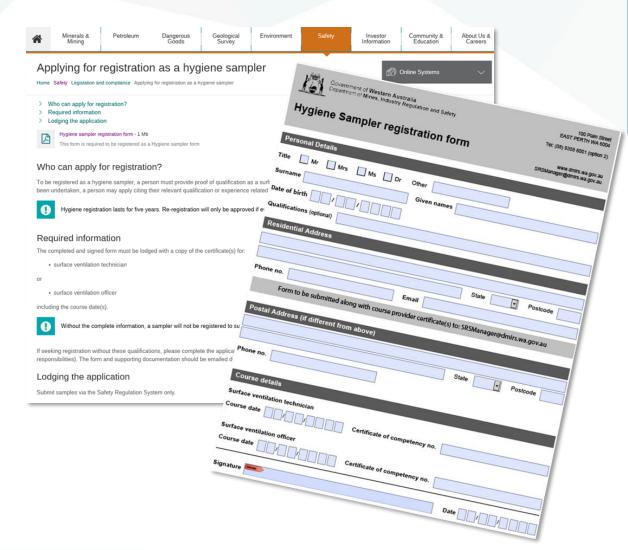
#### **Annual Review – A Brief report**

- What is an annual report?
- A mandatory document that is submitted with each annual review.
- What is included in the report?
- Details of areas that require further efforts to reduce exposures and to control risks.
- Reasons for not meeting the number of samples that were committed to in the initial HHMP submission
- Justification for variations to future sample numbers.
- Reasons for any alterations to the number and frequency of health assessments and audiometric tests.
- Details of changes to controls, including proposed controls.
- Any other matters relating to a sites commitment to effectively manage health hazards.
  - Achievements, initiatives

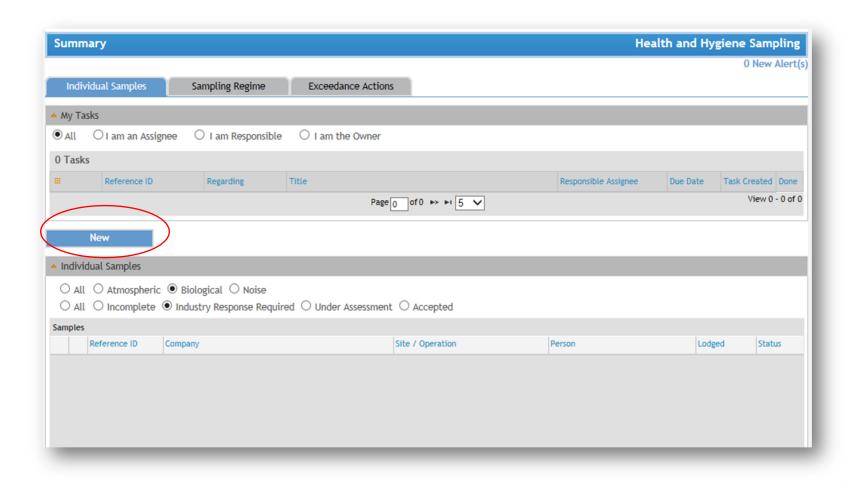
## How to submit samples

#### **How Samples Are Submitted**

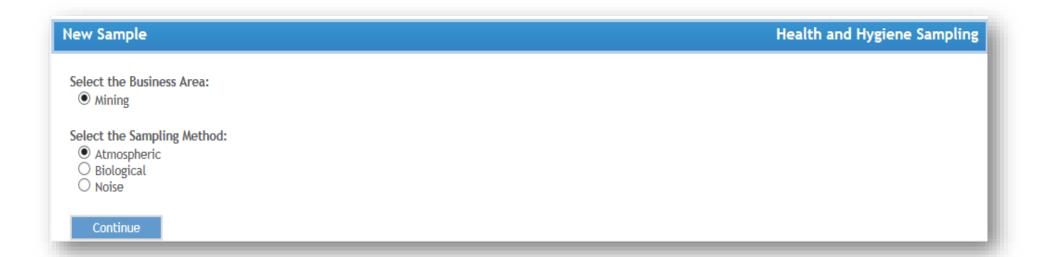
- All samples are submitted electronically
- Only samples collected by "registered samplers" accepted
- Only approved methods accepted
- QC in system ensures all required fields included
- Encourage all samples to be submitted as the data forms basis of actions (or inactions)



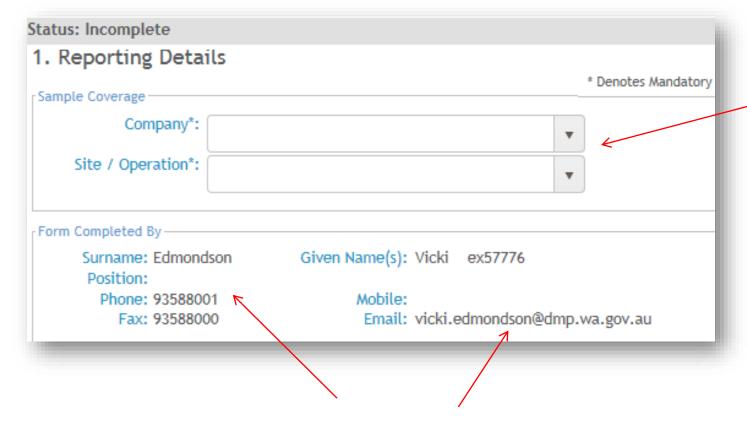
#### Step 1: Select "new" Sample



## **Step 2: Select Sample Type**



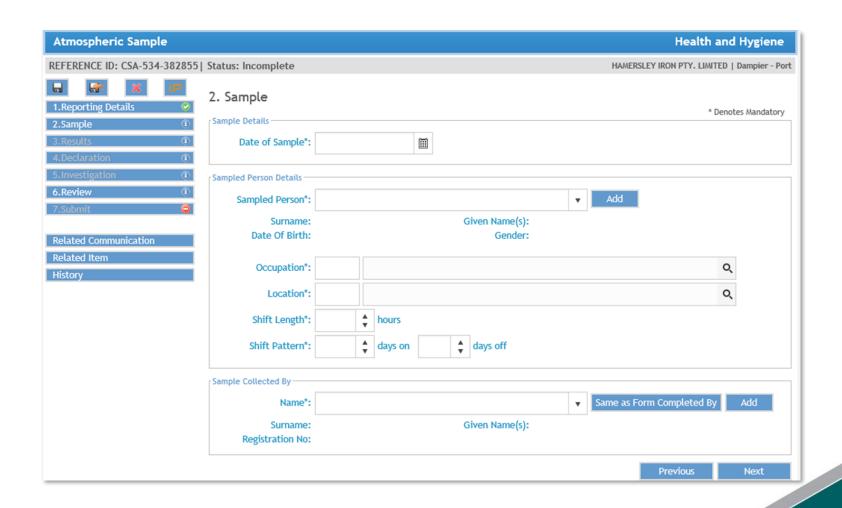
#### **Step 3: Enter Company and Site Details**



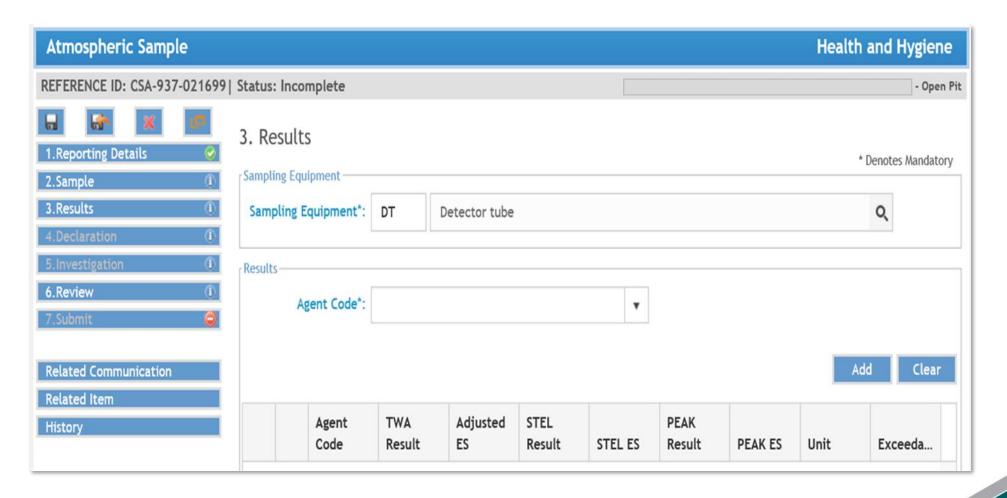
Select the Company and Site from the drop down list

This information will be prefilled

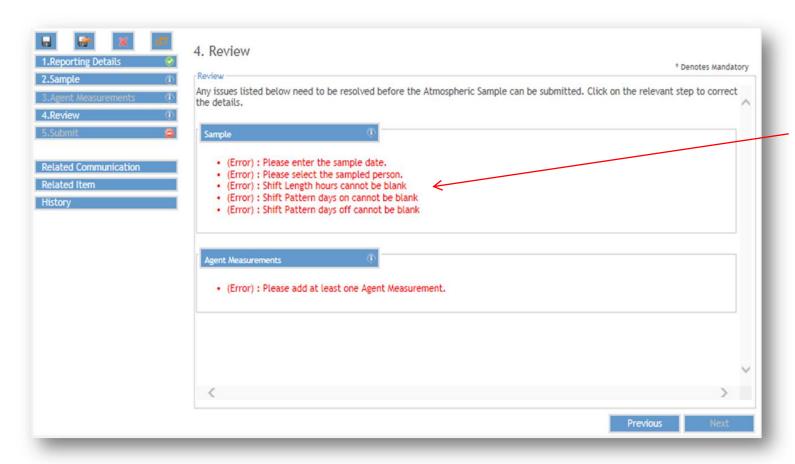
#### **Step 4: Enter Sample Details**



#### **Step 5: Enter Sample Details**

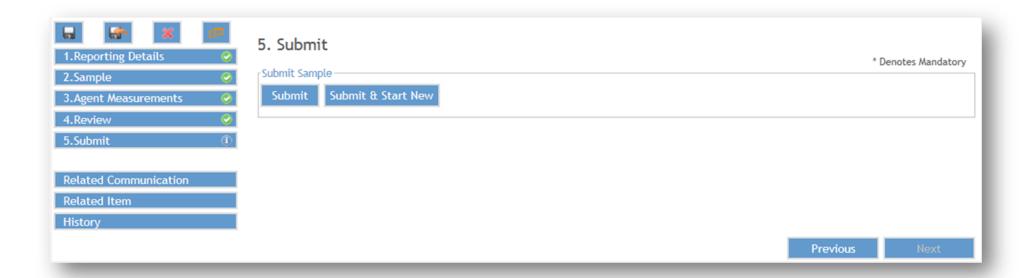


#### **Step 6: Review**



Any errors will appear here and will need to be fixed before you are able to 'submit'

## Step 7: Submit



#### What is bulk lodgement?

- Bulk lodgement functionality allows sites to submit multiple samples
- Two methods are available –xml and xls
- Includes noise and biological samples in addition to atmospheric samples

#### Guides, videos and other assistance available



#### What happens if result exceeds OEL

- A shift adjusted exceedance result triggers
  - A task for the "mine air quality officer /ventilation officer" to complete investigation
  - A notification to inspector(s) that exceedance has occurred.
- If not addressed in timely manner then
  - A task raised for "Senior site Executive/ Mine Manager that investigation is not completed
  - A notification to inspector's manager that investigations not completed
  - (nobody likes this to occur!)

## **Exceedance Declaration**

- If all "yes" then no further action
  - Task is closed
  - Inspector may verify at next site visit
- If a "no" to any
  - Conduct PEEPO investigation
  - Task remains open
- If "no" to all then expect a site inspection!

#### Results

Sampling Equipment: IO - IOM head

#### -Results

		TWA		STEL		PEAK			
		IWA		SIEL		PEAN			
Agent Code	Result	Adjusted Exposure Standard	Result Exposure Standard		Result Exposure Standard		Unit	Exceedance?	
INS	62.0000	6.3000					mg/m3	Yes	

#### Declaration

#### - Declaration

#### I declare that:

- The worker has been provided with suitable and adequate information, training and instruction about the risks and controls associated with airborne contaminants [WHSA s. 19(3) and WHS(M)R r. 39]
- The hazard has not been eliminated or controlled by isolation, engineering or administrative controls and the worker was supplied with respiratory protection devices of sufficient rating and type to ensure the exposure is below the relevant exposure standard [WHS(M)R rr. 36 and 44(3)]
- The worker was provided with respiratory protection devices of a suitable size and fit that are reasonably comfortable for the person to wear, and appropriate information, training and instruction [WHS(M)R rr. 44(3) and 44(4)]
- The worker is subject to an ongoing health monitoring program [WHS(M)R rr. 368 and 675F]
- A health management plan inclusive of airborne contaminants and controls, has been prepared and implemented [WHS(M)R r. Yes 675EA]

Please Note" An Inspector may request evidence to confirm the above declarations. Providing false or misleading information that hinders or obstructs an inspector to exercise compliance powers is a breach of WHS s188

#### Please refer to

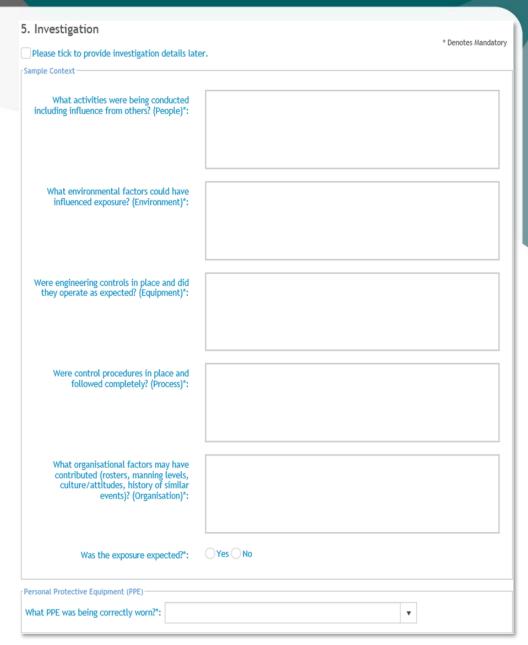
- Work Health & Safety Act 2020
- Work Health & Safety Regulations 2022

No

No

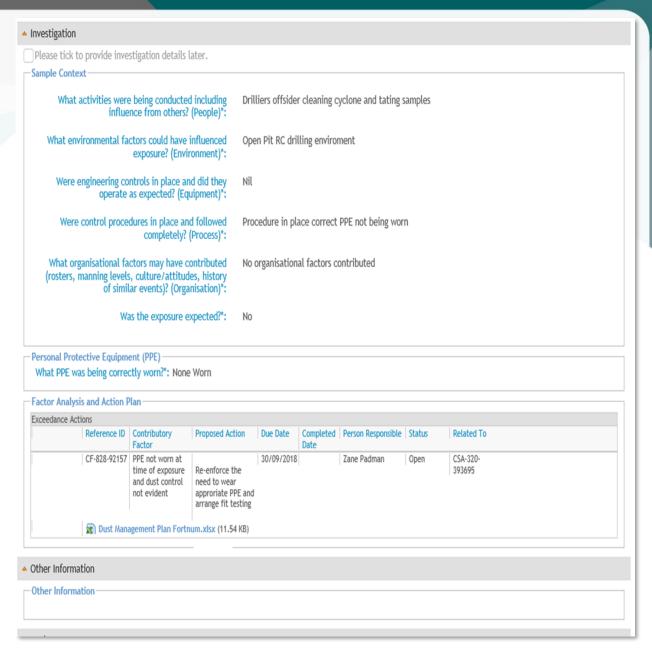
# PEEPO Investigation to find the cause of the over-exposure

- Intentionally only room for a sentence or two
  - Find the root cause
  - "if you cant explain it simply then you probably don't understand the problem"- Albert Einstein
- If no or minimal controls in place and exposure was expected then a site visit likely from inspector

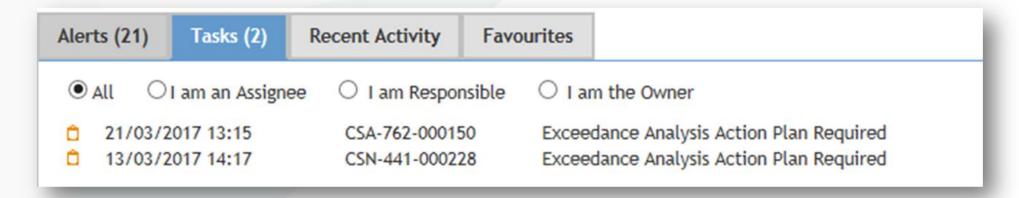


# **Example of Investigation**

- Short description of contributing factors
- Action plan addresses the root cause
- Option to add action plans, training material and records, photos or other documents to support that matter has been properly investigated and appropriate actions taken.



#### **Alerts and tasks**

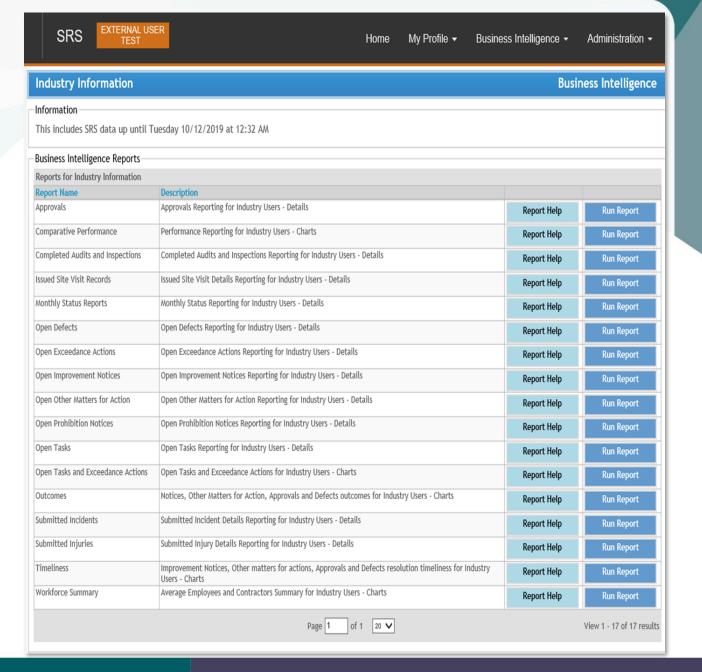


- An exceedance generates the task notification in SRS
- Can see all tasks for the site or just those for your team (I am an assignee), for you (I am responsible) or the manager (I am the owner)

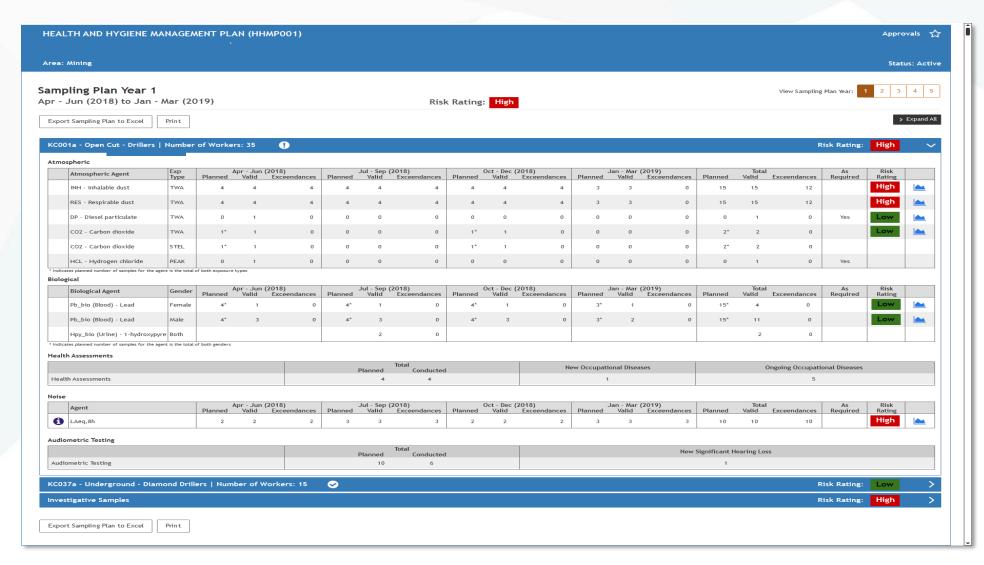
#### **Data & Information in SRS**

#### Reports available

- A range of compliance status reports are available eg.
  - Open notices
  - Open exceedance actions
  - Open tasks
  - Open incident reports
  - Current Approvals
- Can do safety performance comparison
- What Industry sees is same as inspectorate
  - This is a tool used when planning inspection focus



## **Example of Site Summary Status**



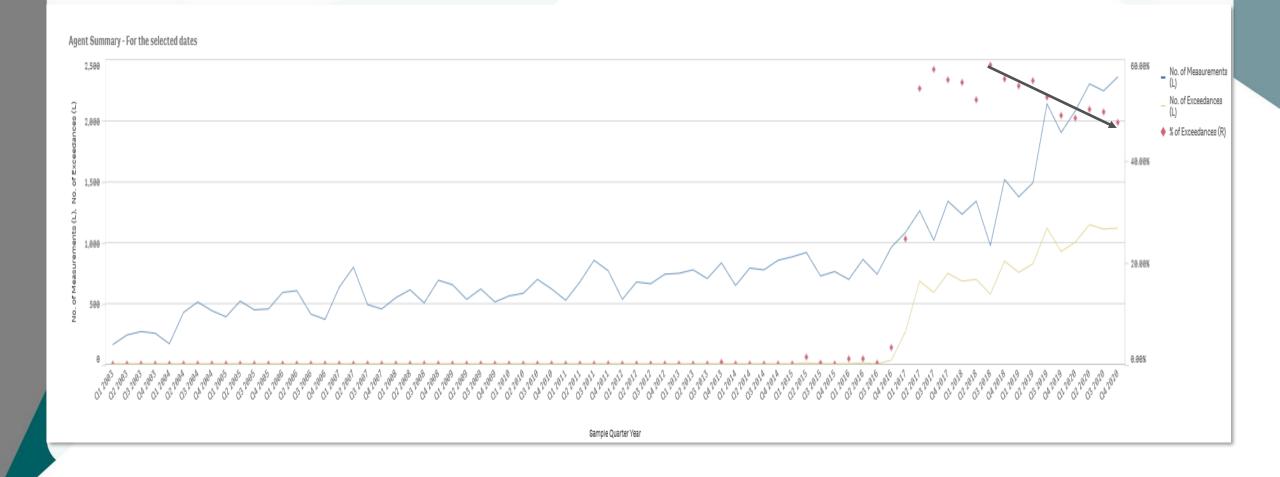
#### **Example of Statistical Package Information**



## **Example of Data that is stored**

ample Date	Company Site Operation	Sample Reference	Sample Status	Occupation	Location	Sampled Person	Date of Birth	Gender		Exposure Type	Result Expo	lard E	xposure	Unit of Measur ement	% of ES E	xceedance
30/09/2021		CSA-655-504391	Accepted	931000 Toolstore Attendant	330 Warehouse / Stores		05/03/1993	Male	SIL - Silica, crystallir	TWA	.0050 0	0500	0.0415	mg/m3	12% N	io
30/09/2021		CSA-677-504389	Accepted	352000 Grader Driver	230 Haul Road		18/10/1964	Male	SIL - Silica, crystallir	TWA	.0050 0	0500	0.0355	mg/m3	14% N	ю
				146000 Township /												
30/09/2021		CSA-339-504393	Accepted	Accommodation Occupations	390 Surface General Area Noc		07/01/1972	Female	SIL - Silica, crystallir	TWA	.0031 0	0500	0.0335	mg/m3	9% N	0
					400 Treatment Plant/Ore											
30/09/2021		CSA-532-504385	Accepted	631000 Fitter	Processing		07/03/1983		SIL - Silica, crystallir			0500		mg/m3	10% N	
30/09/2021		CSA-669-504382	Accepted	411000 Processing Plant Operator	471 Processing Plant Other		13/09/1958	Male	SIL - Silica, crystallir	TWA	.0032 0	0500	0.0415	mg/m3	8% N	0
30/09/2021		CSA-358-505192	Accepted	400000 Ore Treatment Occupations	400 Treatment Plant/Ore Processing		02/02/1972	Male	SIL - Silica, crystallir	TWA	.0100 0	0500	0.0475	mg/m3	21% N	lo.
30/03/2021		C3A-330-303132	Accepted	700000 Electrical / Electronic	400 Treatment Plant/Ore		02/02/13/2	IVIGIC	Sic - Silica, ci ystailii	1447	.0100	0300	0.0475	mg/ms	21/011	
30/09/2021		CSA-240-505199	Accepted	Trades	Processing		10/01/1977	Male	SIL - Silica, crystallir	TWA	.0100 0	0500	0.0475	mg/m3	21% N	lo
,,				900000 Material Handling Stores /	300 Surface Work Areas											
30/09/2021		CSA-228-505210	Accepted	Warehouse Occupations	General		10/05/1967	Male	SIL - Silica, crystallir	TWA	.0100 0	0500	0.0415	mg/m3	24% N	io
30/09/2021		CSA-554-501825	Accepted	221000 Long Hole Drill Operator	100 Underground Workplaces		05/01/1987	Male	SIL - Silica, crystallir	TWA	.0210 0	0500	0.0415	mg/m3	51% N	io
30/09/2021		CSA-470-501826	Accepted	420000 Mobile Plant Occupations	100 Underground Workplaces		05/10/1955	Male	SIL - Silica, crystallir	TWA	.0017 0	0500	0.0415	mg/m3	4% N	io
					400 Treatment Plant/Ore											
30/09/2021		CSA-288-500522	Accepted	411000 Processing Plant Operator	Processing		23/10/1974	Female	SIL - Silica, crystallir	TWA	.0030 0	0500	0.0475	mg/m3	6% N	ю
30/09/2021		CSA-361-510595	Accepted	411000 Processing Plant Operator	550 Wharf Area		12/12/1973	Female	SIL - Silica, crystallir	TWA	.0013 0	0500	0.0475	mg/m3	3% N	ю
29/09/2021		CSA-569-507528	Accepted	311000 Blast Hole Drill Operator	221 Drill Pattern Area		05/11/1992	Male	SIL - Silica, crystallir	TWA	.0030 0	0500	0.0355	mg/m3	8% N	ю
29/09/2021		CSA-144-504376	Accepted	834000 Tyre Fitter	670 Workshop Tyre Fitting		01/02/1995	Male	SIL - Silica, crystallir	TWA	.0066 0	0500	0.0415	mg/m3	16% N	0
					610 Workshop Heavy											
29/09/2021		CSA-363-504374	Accepted	631000 Fitter	Equipment		18/05/2000	Male	SIL - Silica, crystallir	TWA	.0033 0	0500	0.0475	mg/m3	7% N	0
				722000 Telecommunication	300 Surface Work Areas											
29/09/2021		CSA-953-504379	Accepted	Technician	General		01/07/1980	Male	SIL - Silica, crystallir	TWA	.0023 0	0500	0.0415	mg/m3	6% N	0
20/00/2024				441000 Laboratory Technician /	250.1		22/07/4072		eu eu				0.0475		4.50/ 1	
29/09/2021		CSA-237-504373	Accepted	Assistant / Analyst	360 Laboratory		23/07/1973		SIL - Silica, crystallir			0500		mg/m3	16% N	
29/09/2021		CSA-489-504570	Accepted	631000 Fitter	600 Workshop Surface 200 Open Pit		07/05/1983	Male	SIL - Silica, crystallir	IWA	.0051 0	0500	0.0495	mg/m3	10% N	0
29/09/2021		CSA-572-505178	Accepted	100000 General Management / Professional & Supervisory	Production/Development Areas		19/03/1996	Male	SIL - Silica, crystallir	TWA	.0100 0	0500	0.0500	mg/m3	20% N	lo
29/09/2021		CSA-621-505202	Accepted	800000 Miscellaneous Trades / Utilities	200 Open Pit Production/Development Areas		13/10/1998	Male	SIL - Silica, crystallir	TWA	.0100 0	0500	0.0355	mg/m3	28% N	lo
29/09/2021		CSA-297-505186	Accepted	300000 Mining Production & Services (Surface)	300 Surface Work Areas General				SIL - Silica, crystallir		.0100 0	0500	0.0355	mg/m3	28% N	lo
29/09/2021		CSA-181-505200	Accepted	700000 Electrical / Electronic Trades	600 Workshop Surface				SIL - Silica, crystallir			0500		mg/m3	28% N	lo
29/09/2021		CSA-964-505180	Accepted	100000 General Management / Professional & Supervisory	600 Workshop Surface		19/08/1988	Male	SIL - Silica, crystallir	TWA	.0100 0	0500	0.0355	mg/m3	28% N	lo
29/09/2021		CSA-162-505203	Accepted	800000 Miscellaneous Trades / Utilities	200 Open Pit Production/Development Areas		10/05/1976	Male	SIL - Silica, crystallir	TWA	.0100 0	0500	0.0355	mg/m3	28% N	ło
29/09/2021		CSA-818-506937	Accepted	361000 Haulage Truck Driver	230 Haul Road				SIL - Silica, crystallir			0500		mg/m3	11% N	
29/09/2021		CSA-176-502774	Accepted	-	100 Underground Workplaces				SIL Silica crystallin			0500		ma/m3	21% N	

#### Noise (%exceedances and trends)

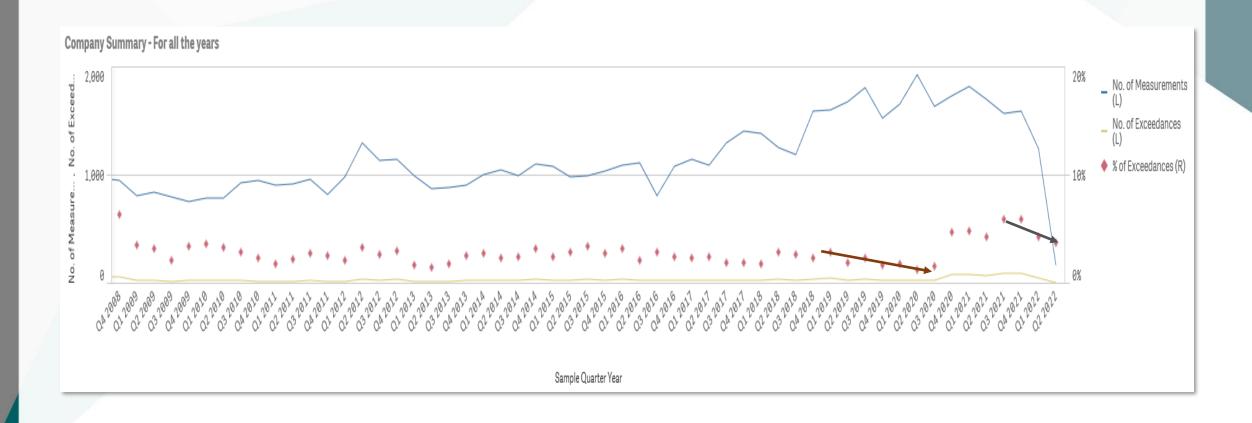


#### **Silica**

- Since 2002, 123216 respirable crystalline silica samples have been submitted
  - ~1700 samples /quarter
  - 5672 or 4.6% exceeded the exposure standard of the time
  - Since introduction of HMP 3.0% (2017-2020) and 4.4% since OEL change (2020—21)
- A campaign on silica awareness occurred in 2020-21 coinciding with the exposure standard changing from 0.1 to 0.05mg/m<sup>3</sup>
- Since HHMP introduction (end of 2017) sampling focus on high risk tasks
- Despite more samples from high risk groups, slight downward trend in exceedances



#### Silica (%exceedances and trends)



#### Data driven targeted inspections

- Silica Quarry
  - Extracts 90% SiO<sub>2</sub> to make silicon metal or decorative aggregate concrete
  - 7% exceedances but up to 35x OEL
  - Directed to improve dust suppression at crushers
    - water spray alarm activated when sprays on causing annoyance in control room!!!
    - · Better sprays and wind shields installed
    - Improved activation timing of sprays
  - Directed to conduct LDCT (rather than Xray) as part of wider health assessment
  - All long term employees 10+, and 20+ years
  - All participated in LDCT scans (included recently retired)
  - No silicosis in current workforce-other health effects identified (asthma, obesity and smoking related)
  - 1 retired person >65 that was a very long term employee had abnormality, but asymptomatic, has been referred to resp. physician

- Gold, Nickel and Tantalum Mines
  - Biological monitoring identified excessive Arsenic exposure when smelting
  - Intervention- workers removed
  - Notices issued-
    - Improvement to engineering controls,
    - Training and hazard awareness
    - PPE selection use and maintenance

#### Impact of HMP's

- By using a HMP the management of health hazards has improved.
  - This was a logical evolution from the historical requirements for a monitoring plan
- Health hazards are managed in a contemporary more holistic manner.
  - Resulting in less samples of low risk occupations (eg admin and supervisors) and more on frontline personnel
- When an exposure standard is exceeded, an investigation is completed and action plan implemented i.e. recognising an exceedance as a hazard exposure
  - Companies have been challenged on inadequate submissions and held to account on commitments in the action plans. In some instances, regulatory action has been taken.

#### **A Positive Change**

- Campaign targeting "dusty operations" has increased awareness of health risk management generally.
- Early indications are an overall reduction in excessive exposures on WA mines. As an example;
  - ~900 WA mine workers were not exposed to excessive levels of silica last year



#### **Questions**

(and the attempt to answer session)

