

Administrative Procedures

HMIS-PRO-SP-409

Industrial Hygiene Monitoring, Reporting and Records Management

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1.0 PURPOSE

This procedure provides the administrative process for the generation, documentation, storage, and disposition of industrial hygiene exposure monitoring records in accordance with the regulatory recordkeeping requirements.

2.0 SCOPE

This Level 1 Administrative Procedure is applicable to Hanford Mission Integration Solutions (HMIS) employees, subcontractors, and sub-tier contractors. This procedure applies to the HMIS electronic records generated using the HMIS portal of the Site Wide Industrial Hygiene Database (SWIHD) and standardized forms/templates used to document monitoring and sampling performed by IH personnel to assess potential work-place exposures. This includes, but is not limited to, data generated from personal, area, bulk, and surface sample collection, direct reading monitoring, and observations performed to assess employee exposures to physical, chemical, biological, and ergonomic hazards.

This procedure is an implementing mechanism of [HMIS-PLN-SP-003](#), *Integrated Environment, Safety and Health Management System Description (ISMS)*, elements Guiding Principle 5: "*Identify Hazards, Environment, Safety and Health (ES&H) Standards and Requirements*" and Core Function 5: "*Provide Feedback and Continuous Improvement*". This document is effective upon publication.

3.0 RESPONSIBILITIES

3.1 Industrial Hygiene Personnel and Program Management

- Ensures that personnel exposure records are handled as OUO.
- Captures information on personnel exposure, including information from field data records.

3.2 Database Administrator

- Ensures data is up to date for real time day to day configuration.
- Performs testing of database releases.

3.3 Industrial Hygiene Records Management

- Serves as Hanford primary point of contact for all IH records management.
- Maintains the storage, handling, and control of OUO documents with personnel exposure.
- Responds to project requests and employee requests for exposure records.

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4.0 INSTRUCTIONS

Planning, documenting, reporting, and managing industrial hygiene survey records using SWIHD and the Integrated Document Management System (IDMS) involves the following:

- Downloading SWIHD from Software Distribution.
- Requesting user access to SWIHD from the SWIHD Administrator.
- Data entry of field and laboratory information into SWIHD survey screens.
- Processing the survey through all the phases as the survey status progresses.
- Communicating results to employees, line management, and the Site Occupational Medicine Provider (SOMP).
- Managing electronic records in IDMS.

4.1 Developing Sampling Plans

Sampling plans are utilized as reference instructions for data collection and as a means to record characterization or sampling, including monitoring, strategies for the historical record. A monitoring/sampling plan may be a document, form, or just a category description in SWIHD to make it easier to report the data later. Use the *Industrial Hygiene Sample Plan* (Site Form A-6005-864) or *Beryllium Characterization/Verification Sampling Plan* (Site Form A-6006-167), as required in DOE-0342 and associated procedures.

Actionee	Step #	Action
IH	1.	GENERATE a sample plan.
	2.	SELECT plan number from the menu in SWIHD for a specific survey and ATTACH sample plan to the survey.

4.2 Surveys

This section discusses the process and requirements for generating surveys using SWIHD for documenting industrial hygiene exposure assessment activities. If the existing method or form does not meet the needs due to an unusual situation, the project IH must coordinate with the database administrator and records custodian to ensure required information will be collected in an acceptable format to meet operational and recordkeeping requirements. It is the management expectation that a survey record is normally completed in SWIHD within 30 calendar days of receiving results (e.g., instrument readings or analytical results) for the survey event.

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Management approval of a plan for completion is required if survey records cannot be completed in this time period.

The SWIHD system does not represent the record material. It is used as a means to collect and access the data. The completed survey and related attachments, sent to long term retention storage in IDMS, is the record material. If database fields or structure are modified to enhance collection, uniform reporting, and/or statistical analysis, it is not considered changing records. If data is modified in the database, such that it would alter the meaning of the record, then revisions to the records are required. SWIHD is programmed to support these types of record revisions, storing the original and revisions in IDMS.

All equipment and calibration standards used must be within calibration and expiration dates. The equipment must function within established parameters for pre and post use functional tests. If an instrument does not function within the established parameters, it is considered Out of Tolerance (OOT) and the Project IH will notify IHES of this Notice of Discrepancy (NOD). The Project IH will evaluate the impact that deviations from these requirements may have on the validity of the data. This includes evaluation of survey results affected by a Notice of Discrepancy (NOD) or Out of Tolerance conditions. The Project IH must document the evaluation in the comments or Out of Tolerance sections of the Survey, as appropriate.

SWIHD programming includes placing the required official use only markings on surveys that are designed to collect personal information and storing completed surveys in IDMS OUO folders with restricted access to protect the OUO information. Industrial hygienists must place OUO information only in SWIHD surveys that include the required markings. Any exceptions must be addressed by contacting the IH records custodian (IHRC) to ensure appropriate markings and protection of OUO information can be accomplished.

4.2.1 Air, Surface, Bulk Sampling Surveys

The process for documenting sampling surveys using SWIHD is described in this section. Backup forms can be used, as described in a later section, if SWIHD is not available. See Appendix A, SWIHD Survey Status Flow.

Actionee	Step #	Action
IH	1.	VERIFY instruments' calibration dates are current, if applicable.
	2.	<u>IF</u> there are discrepancies with dates, <u>THEN</u> CONTACT Industrial Hygiene Equipment Services (IHES).
	3.	TRANSCRIBE field data into SWIHD.
	4.	PRINT Chain of Custody (COC) from SWIHD.

NOTE: Sample numbers on the COC should not be modified.

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Actionee	Step #	Action
IH	5.	COMPLETE control account charge number (CACN) and code of accounts (COA).
	6.	RETAIN a signed copy when the samples are relinquished to the laboratory for in process tracking purposes.
Database Administrator	7.	POPULATE database with the laboratory results as they are received. Attach Final Lab Report to the survey in the database.
	8.	ATTACH Final Lab Report to the survey in the database.
IH	9.	REVIEW laboratory results.
	10.	PERFORM blank corrections as needed.
	11.	COMPARE results to the associated limits.
	12.	<u>IF</u> sampling is to assess personal exposure, <u>THEN</u> REVIEW SWIHD generated notification letter found in the Preview tab.
		NOTE 1: <i>Appendix B contains an example of the SWIHD template for air sampling.</i>
		NOTE 2: <i>Appendix C contains regulatory requirements regarding timely employee notifications.</i>
		NOTE 3: <i>The Site Occupational Medicine Provider can access SWIHD to view personal exposure data for completed surveys.</i>
	13.	VERIFY OUO markings are on the letter.
	14.	MODIFY and SAVE changes in SWIHD.
	15.	ATTACH letter as a PDF in SWIHD.

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Actionee	Step #	Action
IH	16.	<p>DISTRIBUTE personal notification letters to the employee and the employee's supervisor.</p> <p>NOTE: <i>Using notification letter templates that differ from those generated in SWIHD require IH program management authorization.</i></p>
	17.	ATTACH any additional record documents to the survey (e.g., sample plans, final reports) in the Comments tab of the survey.
	18.	USE only accepted file extensions for record retention in IDMS.
	19.	REFER TO HMIS-PRO-32281, <i>Electronic Records</i> , for more information.
	20.	<p>ARRANGE for and OBTAIN IH peer reviews, as necessary, using a graded approach depending on program requirements (e.g., DOE-0342) and management direction.</p> <p>NOTE: <i>IH peer reviews include a review of the files and attachments that support the SWIHD survey.</i></p>
	21.	<p><u>IF</u> there is an out of tolerance condition or Notice of Discrepancy identified that is relevant to the survey, <u>THEN</u> DOCUMENT in the survey an evaluation of the effect on the sampling results.</p> <p>NOTE: <i>This may require opening the survey record to add the evaluation documentation. The SWIHD Administrator can be contacted to open the record as needed.</i></p>
	22.	CONTACT the SWIHD Administrator to open the record as needed.
	23.	COMPLETE Surveys in SWIHD within 30 calendar days of receipt of analytical results.

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4.2.2 Direct Reading Instrument, Heat Stress, Noise Monitoring Surveys

This section describes the process for documenting direct reading instrument (DRI) monitoring surveys, including heat stress and noise instruments, using SWIHD. See Appendix A for the SWIHD Survey Status Flow.

Actionee	Step #	Action
IH	1.	VERIFY instruments' calibration dates are current.
	2.	<u>IF</u> there are discrepancies with calibration dates, <u>THEN CONTACT</u> the IHES.
	3.	TRANSCRIBE field data, including readings, into the database.
	4.	REFER TO Appendix D for an example of the SWIHD template for noise sampling.
	5.	VERIFY OUO markings are on the letter.
	6.	MODIFY the letter and SAVE changes in SWIHD.
	7.	ATTACH letter as a PDF in SWIHD.
	8.	DISTRIBUTE personal notification letters to the employee and the employee's supervisor.
		NOTE 1: <i>The Site Occupational Medicine Provider can access SWIHD to view personal exposure data for completed surveys.</i>
		NOTE 2: <i>The previous steps describe monitoring for personal exposure to noise.</i>
	9.	ATTACH any additional record documents to the survey (e.g., sample plans, final reports) in the Comments tab of the survey.
		NOTE: <i>Only accepted neutral file type for record retention in IDMS should be used.</i>
	10.	REFER TO HMIS-PRO-32281 for more information on acceptable file types.

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Actionee	Step #	Action
IH	11.	<p>ARRANGE for and OBTAIN IH peer reviews, as necessary, using a graded approach depending on program requirements and management direction.</p> <p>NOTE: <i>IH peer reviews include a review of the files and attachments that support the SWIHD survey.</i></p>
	12.	<p><u>IF</u> there is an out of tolerance condition or Notice of Discrepancy identified that is relevant to the survey, <u>THEN PERFORM</u> and DOCUMENT in the survey an evaluation of the effect on the sampling results.</p> <p>NOTE: <i>This may require opening the survey record to add the evaluation documentation. The SWIHD Administrator can be contacted to open the record as needed.</i></p>
	13.	<p>COMPLETE Surveys in SWIHD within 30 calendar days of collecting the instrument readings.</p>

4.2.3 Survey Backup Forms

Contact the database administrator for assistance in assigning temporary survey and sample numbers, if necessary, to survey backup forms. This will aid in ensuring the analytical data received from the laboratory electronically can be matched to the SWIHD generated survey and sample number. The site forms listed in section 6.0 are available to record data if the database is unavailable and data or samples need to be processed immediately. Any forms used must be maintained as records. This can be accomplished by entry into SWIHD, when available, or other approved methods.

4.3 Employee Notification of Monitoring Results

After receipt of any monitoring results for DOE or OSHA regulated agents, notify the affected workers of monitoring results in writing. Required notification timeframes are specific to the regulated agent (see Appendix C). This notification of monitoring results must be made personally to the affected worker (See Appendices B and D). Alternatively, the notification can be posted in a location that is readily accessible to the affected worker, but in a manner that does not identify the individual to other workers (See Appendix E for an example Posting). If the monitoring results indicate that a worker's exposure is at or above a specified regulatory level (i.e., action level or occupational exposure level), the notification must include a statement that the specified level has been met or exceeded; and a description of the corrective action being taken by management to reduce the worker's exposure to below the specified level, if practicable. Refer to the specific exposure standard for the relevant exposure level of interest (i.e., action level or permissible exposure level).

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All notification letters or postings must be attached to the survey record. As a best management practice, notification of exposure results for non-regulated agents should be addressed in a similar manner and within 15 working days. It is important for the IH to refer to DOE-0342 for specific Hanford beryllium exposure notification requirements.

4.4 Handling Documents Marked as OUO

NOTE: *The Site Occupational Medicine Provider can access SWIHD to view personal exposure data for completed surveys.*

Actionee	Step #	Action
IH Personnel/ IH Program management	1.	<p><u>WHEN</u> requesting records marked as OUO, <u>THEN</u>:</p> <ol style="list-style-type: none"> a. PROVIDE personal exposure information only to those individuals with a “need to know” such as the employee to whom the data applies, the employee’s line management, occupational medicine personnel, and other industrial hygiene staff members. b. PREVENT viewing of documents with personal exposure information by those who do not have a “need to know.” c. <u>WHEN</u> transmitting documents containing personal exposure information, <u>THEN</u>: <ul style="list-style-type: none"> • PLACE hard copy documents in an envelope labeled “TO BE OPENED BY ADDRESSEE ONLY” and SEAL envelope. • ENSURE first line of the email message contains the abbreviation “OUO” before the beginning of the message text (not in the email subject line). • <u>IF</u> message itself is not OUO, but attachments or hyperlinks contain OUO information, <u>THEN</u> ENSURE the first line of the email message states “Attachments/Links Contain OUO.”

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4.5 Industrial Hygiene Records Management

The IH program management is responsible for IH records management supported by the IH Records Custodian (IHRC).

Actionee	Step #	Action
IHRC	1.	SERVE as the Hanford primary point of contact for industrial hygiene records management.
	2.	MAINTAIN HMIS Industrial Hygiene records in compliance with the requirements of 10 CFR 851.26 and 29 CFR 1910.1020.
	3.	RETRIEVE information from legacy IH data systems such as HIH2, as well as IDMS.
	4.	SUPPORT IH personnel, the database administrator, and other appropriate personnel in searching and retrieving information from IDMS via SWIHD.
	5.	MAINTAIN appropriate storage, handling, and access control of OUO documents that relate to personal exposure, including employee exposure monitoring assessments notification data packages received from IH personnel.
		<p>NOTE 1: <i>IH records (both hard copy, if any, and electronic) will be kept in compliance with both OSHA and DOE requirements, as well as HMIS-PRO-RM-10588, HMIS-PRO-RM-32281, HMIS-RD-RM-210 and HMIS-PRO-SEC-54603.</i></p> <p>NOTE 2: <i>This function is performed by the IHRC in accordance with HMIS-PRO-RM-10588, HMIS-PRO-RM-32281, and HMIS-PRO-SEC-54603.</i></p>
	6.	RESPOND to requests from the project IH for access to employee exposure records submitted by employees or their authorized representatives (Section 4.6).

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4.6 Requests for Exposure Assessment Data

IH program management, delegate, or IH records custodian shall assure that requested information is provided in a reasonable time, place, and manner. If IH program management cannot reasonably provide access to the record within 15 working days, IH program management shall apprise the employee or designated representative requesting the record of the reason for the delay and the earliest date when the record can be made available.

IH program management may require of the requester only such information as should be readily known to the requester and which may be necessary to locate or identify the records being requested (e.g., dates and locations where the employee worked during the time period in question).

4.7 Database Administration

IH program management, or delegate, is responsible for implementing SWIHD in accordance with HMIS-PRO-IS-309, *Controlled Software Management*.

Actionee	Step #	Action
Database Administrator	1.	UPDATE data sets and data tables within SWIHD to ensure real-time data configuration for day-to-day operations.
	2.	COORDINATE programming needs, perform testing of database releases

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5.0 RECORD IDENTIFICATION

All records are generated, processed, and maintained in accordance with HMIS-PRO-RM-10588, *Records Management Processes*, or HMIS-PRO-RM-32281, *Electronic Records Management*, as applicable.

Table 1. Records Capture Table

Name of Record	Submittal Responsibility	Retention Responsibility
Completed IH Surveys and supporting documents	IH personnel for company	HMIS Industrial Hygiene Program Manager/IDMS

6.0 SOURCES

6.1 Source Requirements

10 CFR 850, *Chronic Beryllium Disease Prevention Program*
 10 CFR 851, *Worker Safety and Health Program*
 29 CFR 1910 Subpart Z, *Toxic and Hazardous Substances*
 29 CFR 1910.1020, *Access to Employee Exposure and Medical Records*
 29 CFR 1926 Subpart Z, *Toxic and Hazardous Substances*
 CRD O 232.2, Supp Rev 0, *Occurrence Reporting and Processing of Operations Information*
 CRD O 471.3, Supp Rev 1, *Identifying and Protecting Official Use Only Information*
 DOE-0342, *Hanford Site Chronic Beryllium Disease Prevention Program (CBDPP)*

6.2 References

[HMIS-PLN-SP-003](#), *Integrated Environment, Safety and Health Management System Description (ISMS)*
 HMIS-PRO-IS-309, *Controlled Software Management*
[HMIS-PRO-RM-10588](#), *Records Management Processes*
[HMIS-PRO-RM-32281](#), *Electronic Records Management*
[HMIS-PRO-SEC-54603](#), *Identifying, Marking, and Protecting Official Use only (OUO) Information*
[HMIS-RD-RM-210](#), *Records Management Program*

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6.3 Forms

A-6001-758, *Industrial Hygiene Air Sample Survey*

A-6001-758.1, *Industrial Hygiene Air Sample Survey - OOU*

A-6004-061, *Industrial Hygiene Bulk Sample Survey*

A-6001-760, *Industrial Hygiene Direct Reading Instrument Survey*

A-6001-760.1, *Industrial Hygiene Direct Reading Instrument Survey- OOU*

A-6001-761, *Industrial Hygiene Noise Dosimetry Survey*

A-6001-762, *Industrial Hygiene Noise Survey*

A-6005-864, *Industrial Hygiene Sample Plan*

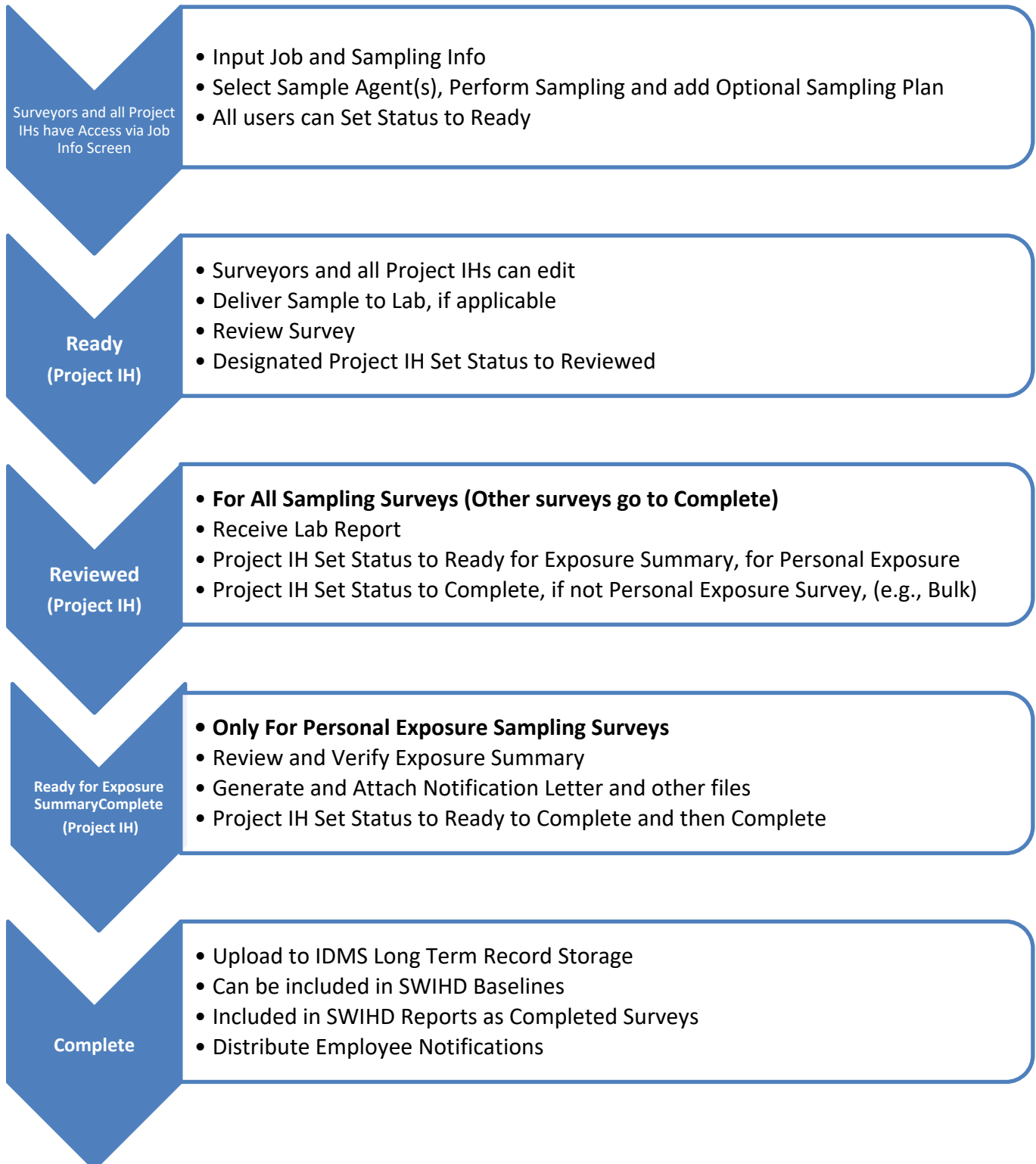
A-6001-759, *Industrial Hygiene Wipe Sample Survey*

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Appendix A. SWIHD Survey Status Flow (User Opening Page Survey List)



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Appendix B. SWIHD Template Employee Notification of Personal Air Sampling Results

EMPLOYEE NOTIFICATION OF PERSONAL SAMPLING RESULTS OUO Workplace Sampling Results

Notification Date: 09/04/2013

[Employee Name (HID)]

MSIN: R3-19

Sample Date: 08/19/2013

Survey Number: 13-60642

Dear [Employee Name]:

On 08/19/2013, Industrial Hygiene conducted personal sampling at the 200W BLDG - 201W, area. At the time of sampling, you were engaged in the following task: Beryllium characterization sampling of 201W/2713WC. Personal sampling provides you with a quantitative assessment of your representative exposure level.

The following controls were in place:

PPE: Gloves, Safety Glasses, Substantial Footwear

The occupational exposure limits (OEL) represent the level under which it is believed that nearly all workers may be repeatedly exposed, day after day, over a working lifetime without adverse health effects. On 08/19/2013 your sample results were:

Agent	Result	Type	OEL	Reference
Beryllium	<Det*	8 hr TWA	0.002 mg/m ³	OSHA

* The detectable limit is the lowest amount of chemical that the current analytical technology can measure.

Sample results show that exposures are below the OEL for the task performed.

NOTE: *The Site Occupational Medicine Provider can access the Site Wide Industrial Hygiene Database to view personal exposure data.*

If you have any questions regarding this letter, please contact me at (509)376-xxxx.

Sincerely,

[Name], Industrial Hygienist

Hanford Mission Integration Solutions

cc: File / Hanford Mission Integration Solutions

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Appendix C. Employee Exposure Notifications

NOTE: *The information below is provided only to assist in determining timely employee notification requirements. Refer to the applicable standards for the specific requirements. The values given in the table are for both OSHA General Industry and OSHA Construction Standards. Differences are bolded and noted with an asterisk to indicate a 5 working day requirement for construction.*

Agent (Standard)	Working Days (Construction difference)
Beryllium, (10 CFR 850.24)	10
1,2-dibromo-3-chloropropane, (29 CFR 1910.1044)	15
1,3-Butdiene; (29 CFR 1910.1051)	15
Acrylonitrile, (29 CFR 1910.1045)	15
Coke oven emissions, (29 CFR 1910.1029)	15
Inorganic Arsenic, (29 CFR 1910.1018)	15
Lead, (29 CFR 1910.1025)	15
Vinyl Chloride, (29 CFR 1910.1017)	15
*Asbestos; (29 CFR 1910.1001)	15 (5)
Benzene; (29 CFR 1910.1028)	15
*Cadmium; (29 CFR 1910.1027)	15 (5)
Ethylene oxide; (29 CFR 1910.1047)	15
Formaldehyde; 29 CFR 1910.1048)	15
Methylene chloride; (29 CFR 1910.1052)	15
Methylene di-aniline; (29 CFR 1910.1050)	15
*Hexavalent Chromium; (29 CFR 1910.1026)	15 (5)

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Appendix D. SWIHD Template Employee Notification of Personal Noise Monitoring Results**INDUSTRIAL HYGIENE NOISE MONITORING****OUO
Workplace Noise Monitoring**

Notification Date: 12/15/2012

[Employee Name (HID)]

MSIN: S2-95

Monitoring Date: 12/11/2012

Survey Number: 12-60526

Dear [Employee Name]:

On 12/11/2012, Industrial Hygiene conducted noise monitoring at the 600 BLDG - 6290, crane and rigging loft and associated buildings. At the time of monitoring, you were engaged in the following task: Routine supervisor duties. Noise monitoring provides you with a quantitative assessment of your representative noise exposure level.

The following controls were in place:

PPE: Safety Glasses, Safety Shoes

The occupational exposure limits (OEL) represent the level under which it is believed that nearly all workers may be repeatedly exposed, day after day, over a working lifetime without adverse health effects. On 12/11/2012 your monitoring results were:

Agent Result

Noise 73.8 dbA

Monitoring results show that exposures are below the OEL for the task performed.

NOTE: *The Site Occupational Medicine Provider can access the Site Wide Industrial Hygiene Database to view personal exposure data.*

If you have any questions regarding this report, please contact me at (509)373-xxxx.

Sincerely,

[Name], Industrial Hygienist
Hanford Mission Integration Solutions

cc: File / Hanford Mission Integration Solutions

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Appendix E. Example Posting of Monitoring Results

AIR SAMPLE MONITORING RESULTS

AGENT SAMPLED FOR: _____

TLV/PEL for AGENT: _____

Action Level for AGENT: _____

BRIEF DESCRIPTION OF TASKS						
Comments: Information, if needed, to better explain the context of the sampling performed.						
PERSONAL AIR SAMPLE RESULTS						
CRAFT	Sample Date/No.	Result (units)	Sample Date/No.	Result (units)	Sample Date/No.	Result (units)
Millwright						
Painter						
Driller						
Notes:						
AREA AIR SAMPLE RESULTS						
	Sample Date/No.	Result (units)	Sample Date/No.	Result (units)	Sample Date/No.	Result (units)
Area samples are representative of overall air quality in the work area.						
Notes:						

POSTING DATE:

REMOVAL DATE: