

TDI *Continued from page 1*

adopted by Congress and so are dated/over 30 years old and are not considered by the industrial hygiene community as protective levels of exposure to chemicals. The National Institute of Occupational Safety and Health ("NIOSH") publishes RELs (recommended exposure limits) which OSHA takes into consideration when promulgating new regulatory exposure limits.

Definitions

The TLV for chemical substances is defined as a concentration in air, typically for inhalation or skin exposure. Its units are in ppm for gases and in mg/m³ for particulates (aerosols such as dust, fumes and mist).

Three types of TLVs for chemical substances are defined:

Threshold Limit Value – Time Weighted Average ("TLV-TWA")

average exposure on the basis of 8h/day, 40h/week work schedule
(Existing for TDI = 5 ppb; proposed for TDI = 1 ppb)

Threshold Limit Value – Short Term Exposure Limit ("TLV-STEL")

spot exposure for a duration shorter than 15 minutes, that cannot be repeated more than 4 times per day
(Existing for TDI = 20 ppb; proposed for TDI = 3 ppb)

Threshold Limit Value – Ceiling ("TLV-C")

absolute exposure limit that should not be exceeded at any time

There are TLVs for physical agents as well as chemical substances. TLVs for physical agents are also defined in terms of what are considered safe levels (8 hours per day and 40 hours per work week). There are TLVs for noise exposure, vibration exposure, ionizing and non-ionizing radiation exposure and heat and cold stress.

You may wish to submit comments to ACGIH by July 31, 2007. When submitting comments, ACGIH prefers that the submission be limited to ten (10) pages in length, including an executive summary. The submission may include appendices of citable material not included as part of the ten page limit.

It would be very beneficial to structure comments as follows:

1. Provide an Executive Summary with a limit of 250 words;
2. Identify, in a vertical list, specific Recommendations/Actions that you are requesting;
3. Provide specific Rationale to justify each Recommendation/Action requested; and
4. Provide citable material to substantiate the Rationale. ACGIH uses only citable material during the TLV/BEI Development process. Citable material is data that is available in the public domain or that ACGIH has written authorization from the owner to use. For unpublished data/studies, it is important for this authorization to accompany the submission and it must grant ACGIH permission to use, cite and release the data.

Potential New California Occupational Standards for Diisocyanates

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In March 2007, DOSH issued a final draft of Policy and Procedure for the Advisory Committee Process for Permissible Exposure Limit ("PEL") Updates to Title 8, Section 5155, Airborne Contaminants¹, which outlines the process to be used to develop proposals for new or revised PELs. The first step of this process is for DOSH staff to develop a list of existing and new airborne contaminant substances to be reviewed for possible inclusion or update to Table AC-1 of Section 5155. DOSH staff will then prioritize the list of substances, followed by an initial advisory meeting to review the entire list of substances to be considered.

The list of substances for review is now posted on the DOSH website². Each substance has been given a priority of 1 to 4. Priority 1 substances are given the highest priority for DOSH's health expert advisory committee ("HEAC") to review. Diisocyanates are listed as a Total Reactive Isocyanate Group ("TRIG") and have been given a priority of 1. DOSH is proposing an Occupational Exposure Limit Time Weighted Average of 0.017 mg/m³ ("TWA") and a Short-Term Exposure Limit ("STEL") of 0.07 mg/m³ (as NCO). DOSH held an initial advisory meeting on June 19, 2007 in Oakland, CA.

Additional information:

Information on the initial advisory meeting can be obtained by contacting Steve Smith (916-574-2996 or ssmith@dir.ca.gov) or Bob Barish (510-286-7001 or bbarish@dir.ca.gov).

General information can be obtained through your diisocyanates supplier or the following individuals at the American Chemistry Council:

Stephanie M. Bernard

Center for the Polyurethanes Industry
Interim Manager for ACC Diisocyanates Panel
703-741-5661 stephanie_bernard@americanchemistry.com

Andrew Jaques

Interim Manager for ACC Aliphatic Diisocyanates Panel
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And we want to thank the:

- Aliphatic Diisocyanates Panel of the American Chemistry Council ("ADI")
- Center for the Polyurethanes Industry of the American Chemistry Council ("CPI")
- Diisocyanates Panel of the American Chemistry Council ("DII") for their efforts to monitor the California DOSH standards for diisocyanates.

Footnotes

- 1 www.dir.ca.gov/dosh/doshreg/PEL-Process-3-07-final-draft.pdf
- 2 www.dir.ca.gov/dosh/doshreg/5155Meetings.htm