

## Update on ACGIH's® TLV/BEI Development Process for TDI

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The American Conference of Governmental Industrial Hygienists ("ACGIH") continues to retain its proposal for revised occupational exposure guidelines for toluene-2, 4-diisocyanate and toluene-2, 6-diisocyanate ("TDI") in its 2009 Notice of Intended Changes ("NIC"). ACGIH's® proposal would lower its recommended time weighted average ("TWA") for TDI to 1 ppb (note that the current TWA is 5 ppb) and its recommended short term exposure limit ("STEL") to 3 ppb (note that the current STEL is 20 ppb). ACGIH® originally proposed these revised guidelines in 2006; this latest action as of July 2011, simply carries forward ACGIH's® recommendations to its 2009 annual meeting. The main reason provided by ACGIH® for not taking final action on the guidelines is that it is still reviewing comments previously submitted by interested parties.

As a consequence of ACGIH's® decision to carryover the proposed guidelines, ACGIH® will be accepting new comments on the proposed change from February 1, 2009 until July 31, 2009. Accordingly, it is not too late to submit comments to be considered by ACGIH® at its annual Board of Directors meeting this fall. PMA will renew, update and submit comments on this proposed standard shortly after the PMA annual meeting in April; comments will be submitted by the end of May 2009.

Note that the Diisocyanates Panel of the American Chemistry Council, which includes major manufacturers of TDI (e.g., BASF Corporation, Bayer Materials Science, Dow Chemical Company and Huntsman Corporation), has already submitted extensive comments on the proposed exposure guidelines, as has PMA. PMA's comments noted that the focus on lower TLVs may be a misplaced attempt at workplace protection, when better prevention from skin contact may be a much better focus. PMA also pointed out that this lower exposure level may be very difficult for industries to monitor, thereby resulting in perhaps less employee monitoring than is currently conducted.

The draft Documentation for the 2009 NIC is available at [www.acgih.org/store](http://www.acgih.org/store). Any decisions made by the TLV®-CS Committee during the 2011 fall meeting will be referred to the ACGIH® Board for review and final actions will be published in the ACGIH® Annual Report in early 2012. We will continue to monitor the ACGIH® review of this Notice of Intended Charge (NIC). ACGIH's® decision is anticipated by early 2012.

## PMA Bylaws Change Proposed

During 2011, the PMA Board of Directors authorized the purchase of a bond to cover the PMA check signers (Executive Director and Treasurer). The cost of the bond was only \$100 and it provides coverage up to the annual income of PMA. This type of bond is recommended for associations to ensure recovery of funds in case of loss or theft.

With the extra security of the bond in place for the check signers, the Board reviewed the need for an annual audit of PMA finances. The audit cost has risen significantly in the past year and was \$4,250 in 2010. The Board recommended that a biennial audit be performed in the year the Treasurer position is up for election. Normally a new Treasurer is elected at that time.

Members will be notified of the proposed bylaws change not less than 14 day prior to the April 2012 annual business meeting and approval requested at the business meeting.

### ARTICLE XI - BOOKS AND RECORDS

The Association shall keep correct and complete books and records of account and shall also keep minutes of the proceedings of its members and of its Board of Directors, and shall keep at the registered or principal office a record giving the names and addresses of the members entitled to vote. All books and records of the Association may be inspected by any member, or his agent or attorney for any proper purpose at any reasonable time. The financial records shall be audited by a certified public accountant outside the Association on an **biennial annual** basis between thirty and sixty days prior to the annual meeting **in the year that the person holding the Treasurer position is elected or re-elected.**