

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

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The American Conference of Governmental Industrial Hygienists ("ACGIH") recently voted 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 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. Because of the time required to properly review, evaluate and consider comments for ACGIH's fall meeting, any comments received after the deadline of July 31, 2009 will not be considered for this year's deliberations, which may be the final opportunity for stakeholders to comment on the revised guidelines before ACGIH takes final action.

PMA members may wish to submit their own comments directly to ACGIH by July 31, 2009. 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.



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Sunday, April 19th

7:00 pm – 9:30 pm

Low Country Boil, or Frogmore Stew, is famous in the low country of South Carolina and Georgia. The stew begins with boiling water and pleasant spices. Potatoes, corn, and sausage are then added. Topped off with delicious, fresh shrimp and crab, this Low Country Boil will have you begging for seconds!

Live jazz music will fill the air with sounds of the South, while Old Savannah Tours will offer Savannah city tours during the reception. A colonial historian portraying General James Edward Oglethorpe, the founder of Georgia, will be sharing stories of Savannah's history.