Exposure Limits: Global Challenges

Chris Laszcz-Davis, MS, CIH, REA
The Environmental Quality
Organization, LLC
Lafayette, California
2010 PCIH
Dallas, Texas

Overview

- Historical & Global Evolution
- OEL Setting Processes Today
- Challenges

Historical Insights

- Prior to the development of OELs, insights into industrial hygiene (occupational hygiene) and chemical exposure were developed
- 90-20 BC: Roman architect/engineer Marcus Vitruvius Pollio noted lead workers had pale gray complexions
- 23-79 AD: Roman Pliny the Elder described workers' use of sheep bladders as masks to protect from mercury dust and vapors
- 1556: Agricola warned of "black lung" in miners (Italian)

Historical Insights

- Prior to the development of OELs, insights....(continued):
 - 1700: Ramazzini, "father" of occupational medicine recommended hygiene, posture, ventilation and protective clothing for workers (Modena, Italy)
 - 1736: state of Massachusetts in USA prohibited use of lead in whiskey stills after fatalities of drinking alcohol from the stills.
 - 1840: France issued a policy discouraging the use of lead as a pigment in paint
 - 1912: Kobert of Germany published a list of acute exposure limits for 20 substances

Historical Insights

Many of the repeated exposure levels "with minimal symptoms" are considered IDHL concentration levels today!

Historical Evolution of OELs

- Parallels Evolution of EHS
- Parallels Culture's Risk Acceptance
- Europe—1880s
- United States—1920s
- China and India—Late 1940s
- Latin America—Recent

European OEL Processes

- First attempts at OEL development in Germany in 1883 on CO, NH_{3,} HCl, etc.
- In 1938 (Germany), a list of OELs (*MAK-Werte*) proposed, but not accepted. The *MAK Kommission* was founded in 1955 and published its first list in 1956 (17 years after the first list of TLVs).
- 1930s, Russia published first MAC list of 30 OELs.
- Later, several European countries created their own Committees to develop OELs—Sweden; Netherlands; UK; France. Often, ACGIH TLVs served as basis for their exposure standards and laws.

European OEL Processes

- 1980s—Control Banding concept first proposed.
- 1991 First set of (27) Indicative Limit Values (ILVs) proposed by a Scientific Expert Group of the European Commission.
- 1995-- The European SCOEL (Scientific Committee on Occupational Exposure Limits) was established.
- 1998-- the social partner Advisory Committee for Safety,
 Hygiene and Health at Work (ACSHH) was formed.
- SCOEL recommendations (ILVs and BLVs) are reviewed with the Advisory Committee, made publicly available for comment and, once finalized, issued by the European Commission.

European OEL Processes

- 2000 Global Harmonized System (GHS) for chemical labeling introduced into EU.
- 2005 Control of Substances Hazardous to Health Regulations (COSHH)
- 2007 Regulation on Registration Evaluation & Control of Chemicals (REACh), with prescribed DNELs often Lower than traditional OELs and including full cycle EHS risks.

European Future Challenges

- Better efforts to establish OELs adopted in all members states and co-ordinated by SCOEL → need better cooperation between the national OEL committees.
- Global threat on Occupational Health (ie, Sweden, Switzerland and Italy). Lack of resources for the SCOEL is an illustration of this.
- In Europe, Occupational Hygiene is much less visible and known than in North America.
- The REACH revolution (strong political commitment & shift of responsibility from the government to private industry!).
- Simplified approaches—Control Banding (ILO 2002 toolkit).

United States Environment

- OEL Setting Within 8 Frameworks
 - 1927 Walsh Healey Act
 - 1946 ACGIH
 - 1971 OSHA
 - 1971 NIOSH
 - 1984 AIHA
 - EPA New Chemical Exposure Limits (TSCA)
 - State Level Efforts, More Restrictive
 - Manufacturers

China's OEL Development

Great Wall



China's OEL Process

- 1950s, People's Republic of China published first list of exposure standards.
- 1990s, Emphasis on Occupational Disease Prevention
- 339 Conservative OELs, National Compulsory Standards
- Health is Primary Consideration, Strive for Economic & Technological Feasibility

Comparison: China's OELs, TLVs and PELs

Hazardous Agents	China' OEL PC-TWA (mg/m³)		ACGIH TLV TWA (mg/m³)	US OSHA PEL TWA (mg/m³)
Methanol	25		262	262
Lead	0.03		0.05	0.05
n-Hexane	100		172	300
Dimethylformamide	20		36	35
Crystalline Silica/ Quartz (respirable)	10%≤free SiO ₂ ≤50% 50% <free< td=""><td>0.7</td><td>0.025</td><td>10/ (%SiO₂+2)</td></free<>	0.7	0.025	10/ (%SiO₂+2)
	SiO ₂ ≤80%		0.023	10, (703102.2)
	free SiO ₂ >80%	0.2		
Noise (8hr per day)	85dbA		85dbA	90dbA

Democratic Republic of India



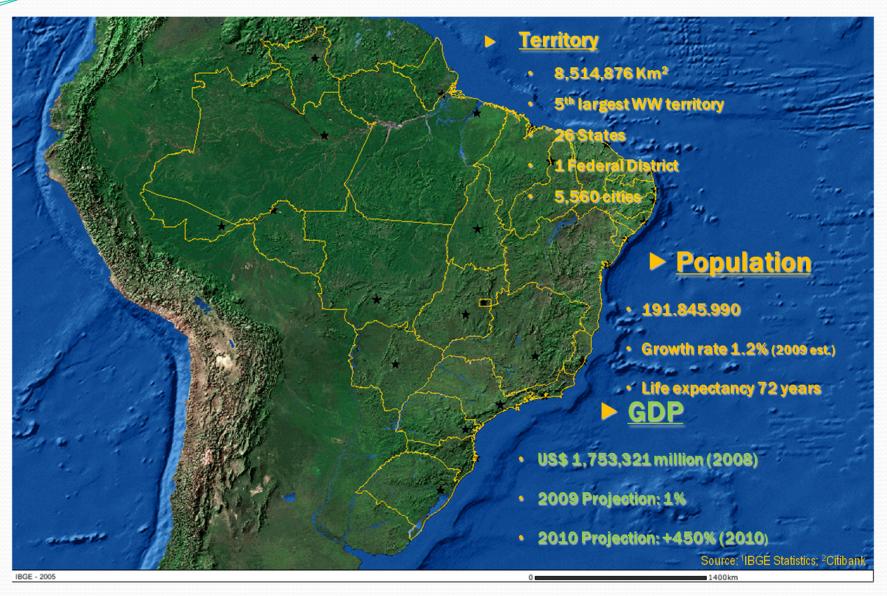
India's OEL Processes

- Reality—Safety Focus
- Huge Workforce—Unorganized Sector
- Lack of Occupational Disease Data
- Meager Spending on Public Health
- No Coherent National Policy
- Factories Act, 1948, Permissible Limits of Exposure of Chemical and Toxic Substance

India Permissible Limits of Exposure (mg/m3)

Substance	ACGIH	OSHA	INDIA
Asbestos	0.1 f/cc	0.1 f/cc	2 f/cc
Benzene	1.6	3	30
Beryllium	0.002	0.002	0.002
Carbon Monoxide	28	55	55
Hexavalent Cr (Sol)	0.05	0.1	0.50
Hexavalent Cr (insol)	O.01		
Manganese fume	0.2	5 ©	1.0
Total Dust	10	15	10
Vinyl Chloride	2.5	2.5	10

Latin America Overview



Latin America General Information

Official Language: Spanish and Portuguese are the most spoken languages

Number of Countries: 43

Social Inequality is a major roadblock. 25% of the population lives with less than \$2 / day.

Brazil is the leading country, followed by Mexico, Argentina and Colombia

Latin American Countries

COUNTRY	EXPOSURE LIMITS	DATE
BRAZIL	ACGIH	1976
ARGENTINA	ACGIH	ACTUAL
CHILE	ACGIH	ACTUAL
COLOMBIA	ACGIH	ACTUAL
MEXICO	ACGIH	ACTUAL
VENEZUELA	ACGIH	2001 (Under review)

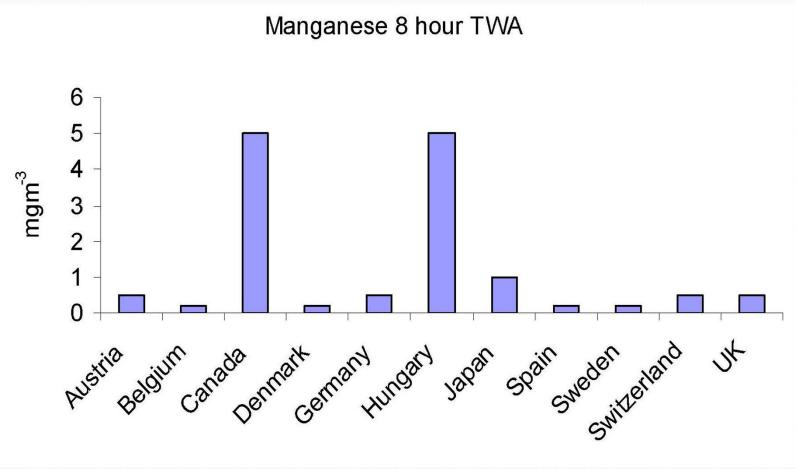
OEL Global Challenges

- Number of Chemicals in Commerce
- OELs—Little Understanding
- Emphasis—Full Cycle EHS Risks
- Not all Value OELs
- Data—Quality & Reliability
- Resources and Expertise

OEL Global Challenges

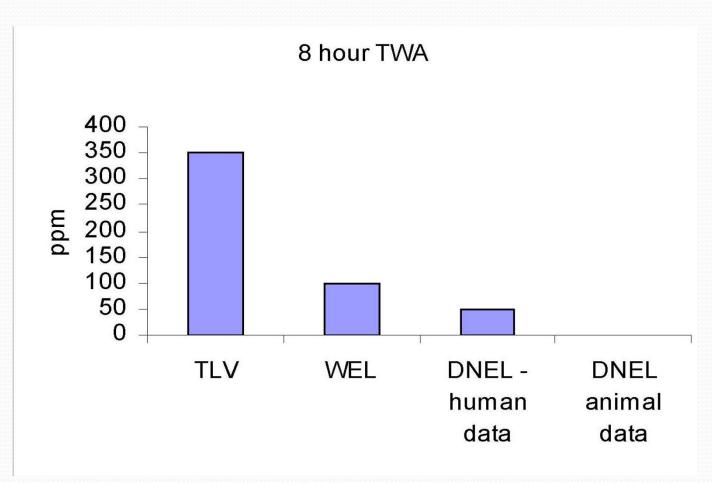
- Varied Risk Determination Efforts, Resulting Exposure Levels and Protection Levels
- Few Direct Measurement Methods
- REACh—New Rules
- OELs—Acceptable Risk vs True Threshold of Toxic Risk.

Various OELs for Manganese



Source: Alison Searl, PhD, Director of Analytical Services, IOM Consulting, *Some Current Approaches to OEL Setting in the EU*, BOHS, Occupational Hygiene Conference, Thistle Hotel, Bristol, 2008.

Derivation of DNELs: 1,1,1 Trichloroethane



Source: Alison Searl, PhD, Director of Analytical Services, IOM Consulting, *Some Current Approaches to OEL Setting in the EU*, BOHS, Occupational Hygiene Conference, Thistle Hotel, Bristol, 2008.

Questions We Must Ask

- Do OELs Have Value Today?
- Are There Alternatives?
- Who Should Participate?

Do OELs Have Value?

- Risk Assessments
- Respirator Selection
- Exposure Priority Setting
- Purchase Decisions
- Control Recommendations for Product Consumers

Are There Alternatives?

- REACH DNELs and DMELs?
- Control Banding?
- Other?

Vision

 Common Value of Protecting **Human Health May Allow for International Sharing of** Information, Development of **Exposure Limits and Their** Documentation.

Who Should Participate?

- Neutral 3rd Party?
- International Body?
- Role of Organizations, Both National and Professional?

Note - Green Paper

- Historical Evolution of OELs
- OEL Setting Processes Today
- OELs Are <u>Critical</u> to Industrial Hygiene and Risk Assessment
- Today's World Community Challenges
- Future Direction?
- Paper available at <u>www.ioha.org</u>.

Excerpt

"... we believe that Occupational Exposure
Limits (OELs) are absolutely critical. We hope
that this Paper will encourage our broad
audience of stakeholders to discuss the
critical issues, continue the dialogue and, as a
call to action, help determine what the future
for OELs should be. In working together, our
profession can lead a way forward."

hank You - Any Questions?

Advocates - Green Paper

- Chuck Adkins, CIH,
- Zack Mansdorf, PhD, CIH, CSP, QEP
- Franklin E. Mirer, PhD, CIH
- John Mulhausen, PhD, CIH, CSP
- Frank M. Parker, III, CIH, CSP, PE, DEE
- Jimmy L. Perkins, PhD, CIH
- Susan Ripple, MS, CIH
- Paul Schulte, PhD
- Robert D. Soule, EdD, CIH, CSP, PE
- Lindsay Booher, CIH, CSP
- Dwight Culver, MD, MS
- Tom Grumbles, CIH
- Michel Guillemin, PhD
- Frank Hearl, MS, PE,
- John Henshaw, CIH
- Michael A. Jayjock, PhD CIH
- Chris Laszcz-Davis, MS, CIH, REA