TO: Distribution

~~TGG: JCL: ERT: MJH: AJO:~~ RF

XF: None

FROM: T. G. Grumbles
DATE: August 20, 1990

Interoffice Communication

VISTA

SUBJ: EMERGENCY RESPONSE PLANNING GUIDELINES

The AIHA has published a new series of ERPG's. A description of what is contained in each document and the list of chemicals for which they exist is attached.

These are the best available guidelines for emergency planning, and are referenced in the draft OSHA Process Safety Standard.

Please call me if you want copies of the specific chemicals listed.

T. G. Grumbles

dlj
.135

Attachment

cc: PROCESS SAFETY TEAM

Paul Warner, Jay Reid-Balt, R. B. Newton, Dan Miller, Randy Polk, Steve Hillman-Aber, Graham Bacon-LCVCM, Stan Allen-LCCP

Jerry Stone, James Cummings, T. G. Grumbles, Eric Meyer

EMERGENCY RESPONSE PLANNING GUIDELINES

AMERICAN INDUSTRIAL HYGIENE ASSOCIATION

The Emergency Response Planning Guideline (ERPG) values are intended to provide estimates of concentration ranges where one might reasonably anticipate observing adverse effects as described in the definitions for ERPG-1, ERPG-2, and ERPG-3 as a consequence of exposure to the specific substance.

The **ERPG-1** is the maximum airborne concentration below which it is believed that nearly all individuals could be exposed for up to 1 hr without experiencing other than mild transient adverse health effects or perceiving a clearly defined objectionable odor.

The **ERPG-2** is the maximum airborne concentration below which it is believed that nearly all individuals could be exposed for up to 1 hr without experiencing or developing irreversible or other serious health effects or symptoms that could impair their abilities to take protective action.

The **ERPG-3** is the maximum airborne concentration below which it is believed that nearly all individuals could be exposed for up to 1 hr without experiencing or developing life-threatening health effects.

The committee recognizes (and all who make use of these values should remember) that human responses do not occur at precise exposure levels but can extend over a wide range of concentrations. The values derived for ERPGs should *not* be expected to protect everyone but should be applicable to most individuals in the general population. In all populations there are hypersensitive individuals who will show adverse responses at exposure concentrations far below levels where most individuals would normally respond. Furthermore, since these values have been derived as planning and emergency response guidelines, *not* as exposure guidelines, they do not contain the safety factors normally incorporated into exposure guidelines. Instead, they are estimates, by the committee, of the thresholds above which there would be an unacceptable likelihood of observing the defined effects. The estimates are based on the available data summarized in the documentation. In some cases where the data are limited, the uncertainty of these estimates is large. Users of the ERPG values are strongly encouraged to review carefully the documentation before applying these values.

In developing these ERPGs, human experience has been emphasized to the extent data are available. Since this type of information is rarely available, however, and, when available, usually is only for low level exposures, animal exposure data most frequently form the basis for these values. The most pertinent information is derived from acute inhalation toxicity studies that have included clinical observations and histopathology. The focus is on the highest levels not showing the effects described by the definitions of the ERPG levels. Next, data from repeat inhalation exposure studies with clinical observations and histopathology are considered. Following these in importance are the basic, typically acute, studies where mortality is the major focus. When inhalation toxicity data are either unavailable or limited, data from studies involving other routes of exposure will be considered. More value is given to the more rigorously conducted studies, and data from short-term studies are considered to be more useful in estimating possible effects from a single 1-hr exposure. Finally, if mechanistic or dose-response data are available, they are applied, on a case by case basis, as appropriate.

It is recognized that there is a range of times that one might consider for these guidelines; however, it was the committee's decision to focus its efforts on only one time period. This decision was based on the availability of toxicology information and a reasonable estimate for an exposure scenario. Users who may choose to extrapolate these values to other time periods are cautioned to review the documentation fully since such extrapolations tend to hold only over very limited time frames, if at all.

VVV 000013475

TO: Bob Seymour-Aber

~~TGG: JCL: EDT: MJB~~ AJO: RF

XF:

FROM: T. G. Grumbles
DATE: August 20, 1990

Interoffice Communication

SUBJ: LEAD PROTECTION POLICY

VISTA

In your comments on the draft Lead Protection Policy, you proposed that workplace lead exposures should be lowered to the point that we don't need the protection policy. The lead protection policy team certainly supports this concept. However, it should be noted that lead is unique in it's capability to harm a developing fetus. There is evidence that exposures to a pregnant female that are well below established permissible exposure limits can result in harm to a developing fetus. This is the rationale for the proposed limits in the "restricted job" definition in the policy. In essence they are to protect the developing fetus, while OSHA PEL's are set to protect employees. However, to set a policy of reducing exposures to below limits that are possible, fetal hazards is impractical at this time.

T. G. Grumbles

dlj

cc: J. R. Drumwright, D. J. Isaac, C. W. Niederhofer

TGG: JCL: ERT: MJH: AJO: RF

TO: John Kirkpatrick - Austin

XF: _____

FROM: T. G. Grumbles
DATE: August 20, 1990

Interoffice Communication

VISTA

SUBJ: **POLYMERS MANAGEMENT TEAM AGENDA**

I am requesting that you obtain an hour of time at the next available Polymers Management Team Meeting to review new product development regulatory and liability issues. The polymers business areas are developing new products that must be reviewed in terms of the impact of multiple regulatory areas as well as for product liability concerns. The purpose of the presentation would be to describe the issues and concerns and begin to determine how polymers product development activities can be integrated into the new product development process being used by the other business areas. The presentation will be done by Bill McClain and myself. A detailed agenda will be available prior to the meeting.

Please advise as soon as possible when the meeting will be. The end of the week of September 17th is best for us.

T. G. Grumbles

dlj