

March 3, 2010

Mr. Robert Barish

Cal/OSHA Research and Standards Unit

P. O. Box 40603

San Francisco, CA 94142-0603

Re: March 24th Meeting of the Health Expert Advisory Panel and Consideration of a
Recommendation of a Permissible Exposure Limit for Trichloroethylene

Dear Mr. Barish:

As you are aware, the Halogenated Solvents Industry Alliance, Inc. (HSIA) represents manufacturers and users of trichloroethylene and other chlorinated solvents. HSIA has sponsored a number of research projects on the potential health effects of the solvent, provided extensive comments on EPA's deeply flawed draft 2001 Toxicological Review of Trichloroethylene for its Integrated Risk Information System (IRIS), provided input to the National Academy of Sciences' review of the draft, and more recently have reviewed and commented to EPA on its revised 2009 draft, which will be reviewed later this year by its Science Advisory Board.

We are writing today to express our support for the current Threshold Limit Value (TLV[®]) of ten parts per million (ppm) as an 8-hour time-weighted average (TWA) for trichloroethylene. This TLV was established by the American Conference of Government Industrial Hygienists (ACGIH) in 2007.

We support the process used by ACGIH for setting Threshold Limit Values. Their process relies on published/peer reviewed scientific studies, reviewed articles and case reports. While it is not a review of all available literature, it does emphasize peer-reviewed literature and unpublished literature pertinent to the issue.

ACGIH's TLV[®]/BEI[®] development process is described in the enclosed overview published by ACGIH. First the TLV[®] Committee places a selected compound on its Under Study list, which is published and updated annually. This list serves as notification and invitation to interested parties to submit substantive data and comments to assist the Committee in its deliberations. After collecting and reviewing the available data, one or more Committee members develop a draft TLV[®] Documentation. After the full Committee accepts the draft Documentation and proposed TLV[®], it goes to the ACGIH Board of Directors for ratification as a Notice of Intended Change, which is published in several formats. There follows a six-month comment period. Following the close of the comment period, if the Committee has seen no data

that change its scientific opinion, it forwards its recommendation to the ACGIH Board of Directors for adoption. Once adopted, the TLV® and the TLV® documentation are published.

In addition to the ACGIH's Threshold Limit Value recommendation of 10 ppm (8 hour TWA) for trichloroethylene, the European Commission's Scientific Committee on Occupational Exposure Limits, which was established in 1995 to advise on occupational exposure limits for chemicals, has also set an occupational exposure limit of 10 ppm. We urge the Health Expert Advisory Panel also to support a PEL of 10 ppm.

HSIA looks forward to working with you and the Panel in your development of a recommendation of a revised PEL for trichloroethylene. Please feel free to contact me if you have any questions about the above information.

Sincerely,

Faye A. Graul

Executive Director

Enclosure