

RESPONSE FORM

Control of Substances Hazardous to Health Regulations 2002 Proposals for Workplace Exposure Limits to implement the 2nd European Commission Directive on Indicative Occupational Exposure Limit Values

We would like you to tell us what you think about the proposals set out in this consultative document. The proposals are summarised below in this reply form which you may wish to copy or tear out and use. Please add extra sheets if you wish.

Name of organisation or company	THE BRITISH OCCUPATIONAL HYGIENE SOCIETY
Name of individual	Mr C.P. BEACH
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Question	Comment
CHANGES TO EXISTING WORKPLACE EXPOSURE LIMITS	
Question 1: Do you agree that the WEL (8-hour TWA) for 2-aminoethanol should be reduced from 3 ppm (7.6 mg.m ⁻³) to 1 ppm (2.5 mg.m ⁻³)? If you disagree, please explain why.	YES
Question 2: Do you agree that the STEL for 2-aminoethanol should be reduced from 6 ppm (15 mg.m ⁻³) to 3 ppm (7.6 mg.m ⁻³)? If you disagree, please explain why.	YES
Question 3: Do you agree that the STEL for chlorine should be reduced from 1 ppm (2.9 mg.m ⁻³) to 0.5 ppm (1.5 mg.m ⁻³)? If you disagree, please explain why.	YES

<p>Question 4: Do you agree that the WEL (8-hour TWA) for chlorine, set at 0.5 ppm (1.5 mg.m⁻³) should be withdrawn? If you disagree, please explain why.</p>	<p>YES</p>
<p>Question 5: Do you agree that the WEL (8-hour TWA) for cyanamide should be reduced from 2 mg.m⁻³ to 1 mg.m⁻³ (0.58 ppm) ? If you disagree, please explain why.</p>	<p>YES</p>
<p>Question 6: Do you agree that the WEL (8-hour TWA) for diethylamine should be reduced from 10 ppm (30 mg.m⁻³) to 5 ppm (15 mg.m⁻³). If you disagree, please explain why.</p>	<p>YES</p>
<p>Question 7: Do you agree that the STEL for diethylamine should be reduced from 25 ppm (76 mg.m⁻³) to 10 ppm (30 mg.m⁻³) ? If you disagree, please explain why.</p>	<p>YES</p>
<p>Question 8: Do you agree that the WEL (8-hour TWA) for morpholine should be reduced from 20 ppm (72 mg.m⁻³) to 10 ppm (36 mg.m⁻³) ? If you disagree, please explain why.</p>	<p>YES</p>
<p>Question 9: Do you agree that the STEL for morpholine should be reduced from 30 ppm (109 mg.m⁻³) to 20 ppm (72 mg.m⁻³) ? If you disagree, please explain why.</p>	<p>YES</p>
<p>Question 10: Do you agree that the STEL for nitric acid should be reduced from 4 ppm (10 mg.m⁻³) to 1 ppm (2.6 mg.m⁻³) ? If you disagree, please explain why.</p>	<p>YES</p>
<p>Question 11: Do you agree that the WEL (8-hour TWA) for nitric acid, set at 2 ppm (5.2 mg.m⁻³), should be withdrawn ? If you disagree, please explain why.</p>	<p>YES</p>

<p>Question 12: Do you agree that the WEL (8-hour TWA) for nitrobenzene should be reduced from 1 ppm (5.1 mg.m⁻³) to 0.2 ppm (1 mg.m⁻³) ? If you do not agree, please explain why.</p>	<p>YES</p>
<p>Question 13: Do you agree that the STEL for nitrobenzene, set at 2 ppm (10 mg.m⁻³), should be withdrawn ? If you disagree, please explain why.</p>	<p>YES</p>
<p>Question 14: Do you agree that the STEL for phosphine should be reduced from 0.3 ppm (0.42 mg.m⁻³) to 0.2 ppm (0.28 mg.m⁻³)? If you disagree, please explain why. (see also Question 23)</p>	<p>YES</p>
<p>Question 15: Do you agree that the WEL for pyrethins of 5 mg.m⁻³ (8-hour TWA) be amended to a WEL for pyrethrum (purified of sensitising lactones) of 1 mg.m⁻³ ? If you do not agree, please explain why.</p>	<p>YES</p>
<p>Question 16: Do you agree that the STEL for pyrethrins, set at 10 mg.m⁻³, should be withdrawn ? If you disagree, please explain why.</p>	<p>YES</p>
<p>Question 17: Do you agree that the STEL for toluene should be reduced from 150 ppm (574 mg.m⁻³) to 100 ppm (384 mg.m⁻³)? If you disagree, please explain why.</p>	<p>YES</p>
<p>NEW WORKPLACE EXPOSURE LIMITS</p>	
<p>Question 18: Do you agree with the introduction of new WELs for isopentane, neopentane and pentane of 600 ppm (1,800 mg.m⁻³) (8-hour TWA), based on the guidance value recommended for use in the reciprocal calculation procedure? If you disagree, please explain why.</p>	<p>YES</p>

<p>Question 19: Do you agree with the introduction of a WEL (8-hour TWA) for 2-(2-Butoxyethoxy) ethanol set at 10 ppm (67.5 mg.m⁻³) ? If you disagree, please explain why.</p>	<p>YES</p>
<p>Question 20: Do you agree with the introduction of a STEL for 2-(2-Butoxyethoxy) ethanol set at 15 ppm (101.2 mg.m⁻³) ? If you disagree, please explain why.</p>	<p>YES</p>
<p>Question 21: Do you agree with the introduction of a WEL (8-hour TWA) for 2-(2-Methoxyethoxy) ethanol set at 10 ppm (50.1 mg.m⁻³) ? If you disagree, please explain why.</p>	<p>YES</p>
<p>Question 22: Do you agree with the introduction of a new WEL (8-hour TWA) for diphosphorus pentoxide of 1 mg.m⁻³ ? If you disagree, please explain why.</p>	<p>YES</p>
<p>Question 23: Do you agree with the introduction of a new WEL (8-hour TWA) for phosphine of 0.1 ppm (0.14 mg.m⁻³) ? If you disagree, please explain why.</p>	<p>YES</p>
<p>SKIN NOTATIONS</p>	
<p>Question 24: Do you agree with the introduction of an Sk notation for acetonitrile, 2-aminoethanol, cyanamide, 2-(2-methoxyethoxy)ethanol and resorcinol ? If you disagree, please explain why.</p>	<p>YES</p>
<p>DOMESTIC LIMIT CHANGES</p>	
<p>Question 25: Do you agree that the STEL for bromine should be reduced from 0.3 ppm to 0.2 ppm ? If you disagree, please explain why.</p>	<p>YES</p>

<p>Question 26: Do you agree that the STEL for diphosphorus pentasulphide be reduced from 3 mg.m⁻³ to 2 mg.m⁻³ ? If you disagree, please explain why.</p>	<p>YES</p>
<p>Question 27: Do you agree with the introduction of a STEL for phosphorus pentachloride at 2 mg.m⁻³ ? If you disagree, please explain why.</p>	<p>YES</p>
<p>GENERAL</p>	
<p>Question 28: In your view how well does this consultation document present the different policy issues involved in this matter? Please tick one box.</p>	<p> <input checked="" type="checkbox"/> Very Well <input type="checkbox"/> Well <input type="checkbox"/> Not Well <input type="checkbox"/> Poorly </p>
<p>Question 29: Is there anything you particularly liked or disliked about this consultation? (Please add extra sheets if you wish)</p>	<p>The CD clearly outlines the relevant facts and the decisions to be made, and proposals err on the side of health & safety. Excellent.</p>

Please return to:

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To reach him no later than 27 September 2006.

Please note: All views will be placed in HSE Information Centres unless you specifically state that this response, or a part of it, should be treated as confidential.