

Workplace Quality News



Number 25, July 2007

The Occupational Safety and Health Administration (OSHA) Renews Support for the Refractory Ceramic Fibers Coalition's Product Stewardship Program

By Russ Person, Risk Management Specialist



Shown seated from left to right: Dell Hadden, Thermal Ceramics, Vice President of Operations; David Brooks, Unifrax I LLC, President and CEO, Edwin Foulke, Assistant Secretary of Labor for Occupational Safety and Health; Dean Venturin, Ph.D., President, RCFC

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OSHA Renews Support . . . Continued from page 1

In 2002, the Occupational Safety and Health Administration (OSHA) endorsed a five year voluntary product stewardship program called PSP 2002. On May 23, 2007, the Refractory Ceramic Fibers Coalition (RCFC) member companies, including Unifrax, renewed this voluntary product stewardship agreement with OSHA.

This five year program, called "PSP-HTW" (High Temperature Wools), continues and builds upon PSP 2002. PSP-HTW is a highly acclaimed, multi-faceted strategic risk management initiative designed specifically to reduce workplace exposures to refractory ceramic fiber (RCF). PSP-HTW has been developed for use wherever RCF is manufactured, fabricated, installed, or removed as well as in other occupational settings where workers have potential exposure to airborne RCF. RCFC will report its progress on the implementation of PSP-HTW to OSHA annually. Although there are no reporting provisions for non-RCFC member companies, all RCF users will be encouraged to adopt the key elements of PSP-HTW.

The provisions of PSP-HTW are consistent with the 2006 NIOSH Criteria Document for RCF which adopted the RCFC's recommended exposure guideline of 0.5 fibers per cubic centimeter NIOSH REL.

OSHA made a special point to commend RCFC for its attention to the safety and health of workers who use RCF. In a letter to RCFC, the Assistant Secretary of Labor for Occupational Safety and Health, Edwin Foulke, commented that ". . . the actions outlined in the program that the Refractory Ceramic Fibers Coalition has committed to in order to reduce exposures to refractory ceramic fibers will certainly help in improving employee safety and health."

Unifrax has long believed that product stewardship for RCF is the most responsible risk management strategy that the industry could initiate. With this agreement, OSHA formally supports RCFC's worker protection efforts and helps to continue the industry's tradition of cooperative agreements with the regulatory community.

For more information, see <http://www.rcfc.net>

A Far REACHing Chemical Regulation in the EU

By Russ Person, Risk Management Specialist

Registration, Evaluation, and Authorization of Chemicals (REACH) is a European Union regulation (No. 2006/1907) of December 18, 2006. REACH covers the production and use of chemical substances in the European Union. The regulation is currently over 800 pages, and took seven years to pass. It has been described as the most complex legislation in EU history and the most important in 20 years. It is the strictest law to date regulating chemicals and will impact industries throughout the world.

Since it came into force in June 2007, REACH requires all chemicals of one tonne or more in volume that are manufactured in or imported into the European Union each year to be tested for health and safety and registered with a new central European authority – the European Chemicals Agency (ECA), which will be located in Helsinki, Finland. The ECA will manage the technical,

scientific and administrative aspects of the REACH system.

REACH encourages manufacturers and importers of such chemicals to pre-register them during the 6 month pre-registration period - June 1, 2008 to December 1, 2008. This will allow the companies much more time before they have to test and fully register the chemicals.

REACH also prioritizes chemicals that are considered of very high concern to health or the environment. Depending on the substance and its use, producers and importers may be obliged to investigate its effects on human health and the environment. Chemicals classified as carcinogens, reproductive toxins, or those that accumulate in humans or animals - can only be used if authorized by the European Chemicals Agency.

— *REACH Continued on page 3*

Fiber Ranges Chart

By Patrick Snodgrass, CSP, CHMM, Sr. Health and Safety Engineer

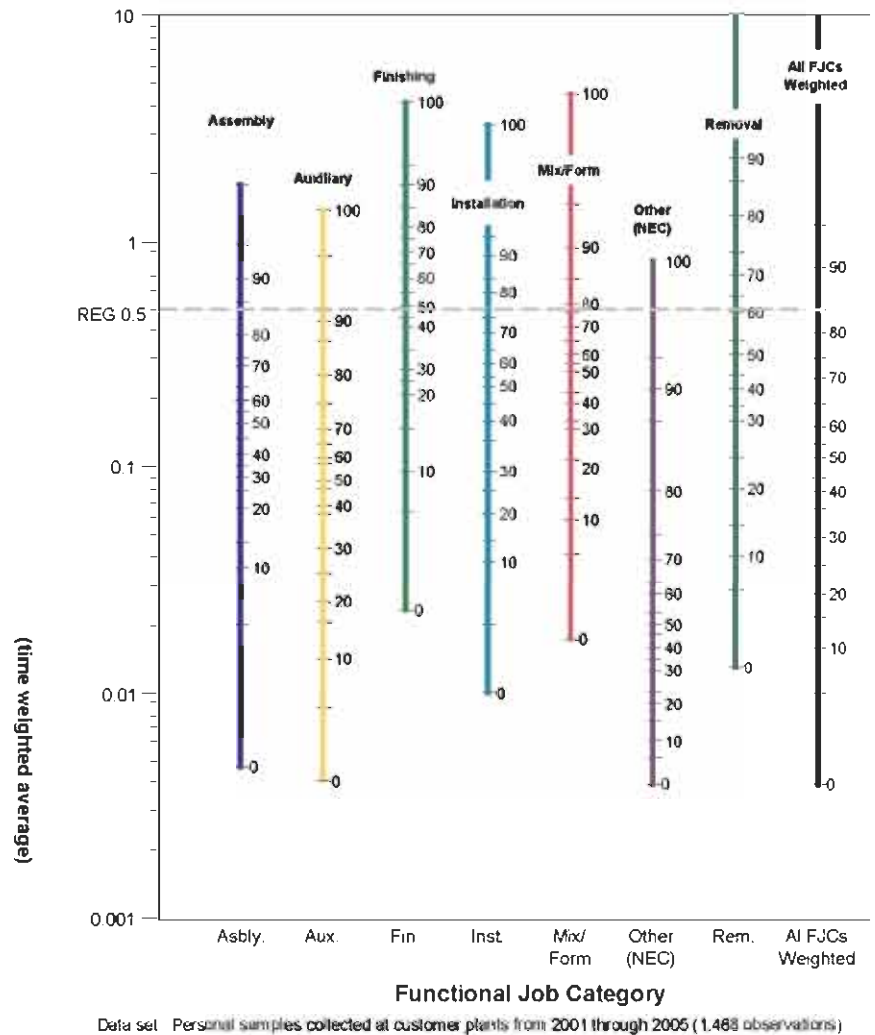
The diagram shown at right presents a graphical representation of RCF exposure monitoring data separated into eight distinct work tasks. The range of RCF exposure data for each of the eight work tasks is represented by a colored vertical line based on a percentage scale from 0 to 100%.

As an example, the corresponding vertical line for the "Installation" job tasks show the measured exposures range from approximately 0.01 f/cc to 3.2 f/cc. In addition the graph shows that approximately 73% of the measured exposures in this "Installation" job task category are below the Refractory Ceramic Fiber Coalition (RCFC) Recommended Exposure Guideline (REG) of 0.5 f/cc while the midpoint of the "Installation" job category range, at 50% is approximately 0.23 f/cc.

This diagram is based on 60 months work of RCF monitoring data collected by the RCFC member companies within their facilities as well as at various customers' facilities from 2001-2005.

This diagram is a supplemental tool to be used for comparative purposes only and should never be used as a sole mean of evaluating potential exposures. Questions regarding this diagram may be directed to the Unifrax PSP Hotline at 1-800-322-2293.

Refractory Ceramic Fiber (RCF) Exposures 2001-2005 Monitoring Results



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Refractory Ceramic Fiber (RCF), is considered to be one of these "high priority" substances, as it is classified as a category 2 substance in the EU (See European Directive 97/69/EC). ECFIA, an industry association representing the high temperature insulation wool industry in Europe, is currently preparing a strategy to address REACH.

REACH applies to all chemicals imported or produced in the EU, in contrast to the US Toxic Substances Control Act (TSCA) which only applies to chemicals newly coming into use. REACH will be phased in over 11 years. For more information on REACH, including the text of the regulation, see the following link:

http://ec.europa.eu/environment/chemicals/reach/reach_intro.htm

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**Anyone interested in Issues 1-20, call the
PSP Hotline at 1-800-322-2293**



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