



Workplace Quality News



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ACGIH ADOPTS RCF TLV AND CLASSIFICATION

Jim Gason, Vice President of Risk Management

The Board of Directors of the American Conference of Governmental Industrial Hygienists ("ACGIH") recently took action to adopt a Threshold Limit Value (TLV) of 0.2 f/cc for refractory ceramic fiber (RCF) and a classification of "A2-Suspected Human Carcinogen." Prior to adopting the TLV, ACGIH was asked repeatedly to explain its scientific rationale, or provide its analysis of the data, or demonstrate in any other way why this stringent TLV was necessary, but no response was ever forthcoming.

There are several implications RCF end-users need to consider. For example:

- ACGIH does not advocate the use of TLVs as legal standards. However, under current policy, federal or state OSHA officials could attempt to enforce the TLV as a workplace exposure standard under the "General Duty Clause," and foreign governments may adopt the TLV as an enforceable standard as well.
- OSHA's Hazard Communication rule requires employers to advise workers of the TLV in material safety data sheets (MSDS). Unifrax MSDSs have been revised to reflect the TLV.

- Some companies use TLVs as internal workplace exposure standards.

The TLV documentation prepared by ACGIH indicates that the RCF TLV does not reflect an objective analysis of all of the available scientific information. A report prepared by the National Academy of Sciences likewise concludes that "ACGIH has not provided a scientific rationale" for the 0.2 f/cc TLV.

We do not believe that the TLV is suitable for any regulatory purpose; in particular, it does not provide a sound basis upon which to make an OSHA "general duty" citation. It is generally not feasible to comply with this unreasonable TLV in many industrial environments. Our analysis suggests that the RCF TLV is also unusually severe, as compared to other ACGIH TLVs.

One might wonder which exposure standard requires the most attention. There is no specific regulatory standard for RCF in the United States; however, OSHA's Particulate Not Otherwise Regulated ("PNOR") standard applies generally. In addition, when determining an employer's compliance with the general duty clause, it is unclear whether OSHA will consider RCF's recommended exposure guide-

line (REG) of 0.5 f/cc or ACGIH's TLV of 0.2 f/cc. The RCF REG may be compelling as it is equal to the lowest generally applicable regulatory threshold used globally. Nevertheless, RCF end-users are encouraged to evaluate the RCF TLV documentation thoroughly and consider potential for compliance implications.

Finally, RCF end-users should evaluate workplace exposures in light of these recommendations and act accordingly. Since October, 1997, we've encouraged RCF end-users: (1) to control RCF exposures, where possible, to levels at or below the REG; (2) to use respiratory protection when RCF exposures are unknown or exceed the REG; and, (3) to seek further exposure reductions, through engineering or process controls, as they become feasible. In addition, we've encouraged employers to accommodate individual employees who, for reasons of personal choice or comfort, wish to wear respiratory protection even though RCF exposures are reliably below the REG. At this point in time, these recommendations remain unchanged.

If you have questions or comments about this topic or other RCF-related health and safety issues, please call our Product Stewardship Hotline at 1(800) 322-2293 for assistance.

Fire Protection Applications for Unifrax Products

Greg Drumm, Senior Environmental Analyst

Over the past several months, the Unifrax Product Stewardship Hotline (800-322-2293) has received numerous requests for information regarding certifications and approvals for Unifrax products in fire protection applications. The list below highlights many of the current certifications and approvals from Underwriters Laboratory (UL), for Unifrax products in fire protection applications within the United States. Please note that this is a continually growing list and that some additional products and applications may be certified and added to the list in the near future. If you have specific questions regarding certifications/approvals for Unifrax products, please contact Unifrax's Application Engineering department at 716-278-3800.

Unifrax Corporation Certifications and Approvals for Fire Protection Applications

RECOGNIZED COMPONENTS:

<u>Category</u>	<u>Products</u>	<u>Applications</u>	<u>UL File No.</u>
Refractory Liners (MENQ2)	Durablanket 970 Paper Lo-Con Felt	Duct /Flue Insulation Combustion Box Insul.	MH7030
Plastics (QMFZ2)	110 Paper 440 Paper Duraboard LD Moist Pack D	Oven, Microwave, Toaster Insulation	E75289
Intumescent Mat (BIBQ2)	XFP-A, XFP-S	Expansion Joint Fire Barrier	R15435

CLASSIFIED PRODUCTS:

<u>Category</u>	<u>Products</u>	<u>Applications</u>	<u>UL File No.</u>
Batts and Blankets (BKNV)	Durablanket Insulfrax Blanket FyreWrap Duct Insul.	Noncombustible Insul. Flame/Smoke Ratings	R14514
Forming Materials (XHKU)	Duraboard LD Insulfrax Blanket Durablanket Durablanket SE	Firestop Damming Mat'l Expansion Joint Fire Barrier	R9618
Duct Wrap Materials (XHHD)	FyreWrap Duct Insul.	Firestopping Comp.	R14514

CLASSIFIED SYSTEMS:

<u>Category</u>	<u>Products</u>	<u>Applications</u>	<u>UL File No.</u>
Fill, Void or Cavity Mat'ls (XHHW)	Fyre Putty	Firestopping	R10983
Batts and Blankets - Marine Type (VZMX)	Coast Guard Durablanket	A-60 Bulkheads	R14273
Grease Duct Enclosures (YYET)	FyreWrap Duct Insul.	Zero Clearance Grease Duct Wrap - 2 hr. Rating	R14514

Fiber Waste Management

Dean Venturin, Manager, Health, Safety, and Environment

From time to time, people call the Unifrax Health Hotline to request information on the proper handling of RCF-containing waste materials. The first thing that they typically ask is, “Are RCF’s a hazardous waste?” Thanks to federal regulations, the answer to this question can sometimes be a little more complex than one might initially think.

All of Unifrax’s fiber product lines (e.g., Fiberfrax®, Insulfrax®, Isofrax™, Fibermax® and derived products), as purchased (prior to use), are neither a “listed” hazardous waste, nor do they display the “characteristics” of a hazardous waste. It is important to note, however, that pursuant to federal regulations, it is the “waste generators” responsibility to properly characterize a waste material for purposes of disposal. If a product has been modified, contaminated, or otherwise chemically altered due to handling, storage, use, or been in contact with other potentially regulated materials; the product’s waste classification may be affected.

In the U.S., management and disposal of solid waste is regulated at the federal level under the Resource Conservation and Recovery Act (RCRA). RCRA Subtitle C authorizes the Federal Environmental Protection Agency (EPA) to write and enforce regulations governing treatment, storage, and disposal of hazardous waste. EPA’s hazardous waste regulations under RCRA Subtitle C appear in the Code of Federal Regulations (CFR) at 40 CFR Parts 260 through 268.

RCRA states that, wherever feasible, the generation of hazardous waste is to be reduced or eliminated as expeditiously as possible. Waste that is generated, must be treated, stored, and disposed of so as to minimize the present and future threat to human health and the environment. The basic intent is to regulate hazardous waste from the minute

it is generated to the time it is ultimately disposed or destroyed (cradle-to-grave).

The first step in hazardous waste management is to identify what wastes are subject to EPA’s hazardous waste regulations. There are three steps to hazardous waste identification. First, the material must meet EPA’s definition of “solid waste” before it can be classified as hazardous waste (see 40 CFR §261.2). Second, if a material is a solid waste, look for it on one of the lists of hazardous wastes in EPA’s regulations, which list specific types of waste as hazardous (see 40 CFR 261, Subpart D). Third, if the material is not a “listed” hazardous waste, determine whether it exhibits any of the “hazardous characteristics” identified in EPA’s regulations. The regulations include tests for determining whether a waste should be regulated as hazardous because it is ignitable, corrosive, reactive or toxic (40 CFR Part 261, Subpart C).

Although activities involving the management of hazardous waste are regulated by the federal government, it is also possible for a state to assume responsibility for controlling hazardous waste activities within the state. A state which desires to operate its own hazardous waste program in lieu of the federal system, must develop a state program that is “equivalent to and consistent with” the federal program. Individually, state standards may be more stringent as long as they meet the minimum requirements of the federal regulations.

The Unifrax Material Safety Data Sheet (MSDS) recommends that generators check local, regional, state or provincial regulations to evaluate disposal options. The “waste generators” ultimate responsibility is to properly characterize and manage waste materials in accor-

dance with standards established within each of the governing jurisdictions.

In general, there are a number of things that may be helpful to consider when managing the disposal of Unifrax high-temperature fibers.

- It may be beneficial to contact landfill operators designated to receive fiber wastes to ensure that the material is properly identified and not confused with other materials of similar appearance, that may have special waste handling requirements.
- Always properly containerize fiber wastes in bags or covered containers to avoid dust emissions during transportation to the disposal facility.
- Although “wet methods” are preferred for fiber removal operations to minimize dust emissions, care should be taken not to exceed allowable “liquid concentrations” for landfill designated wastes.
- Refer to and follow Unifrax’s recommended handling procedures as described in RCF health and regulatory informational brochures and the appropriate material safety data sheet (MSDS). Additional copies of this information can be obtained from:

For MSDS’s

The Unifrax Corporation
Attention: Customer Service
2351 Whirlpool Street
Niagara Falls, NY 14305-2413
716-278-3872 or visit
www.unifrax.com

For health information

The Unifrax Corporation
Attention: Tammy Wolosin
(800-322-2293)

Unifrax Corporation
310 Creekside Drive
Amherst, NY 14228-2074

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US Postage
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Nia. Falls, NY

Workplace Quality News Information Guide

NUMBER 14

(Order Code: Amh-wqn-14)

- ACGIH Adopts RCF TLV
- Fire Protection Applications
- Fiber Waste Management

NUMBER 13

(Order Code: Amh-wqn-13)

- PSP 2000 - The Strategic Plan
- AIHCE Conference Activities
- Vacuum Former Establishes In-House Monitoring Program

NUMBER 12

(Order Code: Amh-wqn-12)

- NIOSH and RCF Team Up To Promote Airborne Fiber Reduction Strategies
- Overview Of Airborne Fiber Monitoring
- Findings From European RCF Health Study

NUMBER 11

(Order Code: C-1322-11)

- Risk Assessment Summary
- A New Era In Respiratory Protection
- Unit Operational Code Of Practice & Engineering Controls Guidebook

NUMBER 10

(Order Code: C-1321-Q)

- Dust-Hound...A Portable Dust Collection Unit
- Portable Power Tools With Integral Dust Collection
- Recommended Handling Practices For RCF Blankets & Felts

Anyone interested in Issues 1-9, call the PSP Hotline at 1-800-322-2293



For MSDS's or Product Information:

Unifrax Corporation

2351 Whirlpool Street, Niagara Falls, NY 14305-2413

Telephone: 716-278-3800

Telefax: 1-800-FAX-FIBR (1-800-329-3427)

www.unifrax.com email: info@unifrax.com

For Product Stewardship Program and General Health Literature/Assistance:

Unifrax Corporation

310 Creekside Drive, Amherst, NY 14228-2074

Telephone: 716-564-4122 Fax: 716-564-4120

PSP Hotline: 1-800-322-2293

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