

From: Kevin White [mailto:kwhite@cpf.org]

Sent: Tuesday, April 30, 2013 12:05 PM

To: Horowitz, Mike@DIR

Subject: Regarding proposed revisions to Title 8, Section 5194, Hazard Communication

Mike,

On behalf of the California Professional Firefighters, I am writing in regard to the draft language for proposed section 5194, Hazard Communication.

The draft language reduces the quantity and quality of information provided to firefighters for fire prevention inspections and pre-incident planning. The federal required information is less, both in quantity and quality, than is currently required in California regulations.

The issue for firefighters relates to any potential for carcinogenicity or toxicity as related to fire or hazmat emergency responses. With the compounding, accumulative exposures to multiple unknown sources or a period of career time, we are concerned about:

1. Potential carcinogenicity and other health hazards;
2. Complete information on Safety Data Sheets (SDS) to document accumulated occupational exposures.

As such, any and all possible information regarding chemicals and compounds with any possible health hazard must be made available for pre-incident inspections and planning.

The information available before an incident, allows for planning of personal protective equipment and tactics to be used to mitigate the emergency. The completeness of information about possible hazards available before an emergency enables firefighters to utilize the most appropriate personal protective equipment and tactics to maximize public and personal safety.

The purpose of the SDS is to provide information to the user of the chemical or compound the proper use and safety information to reduce exposure to potential health hazards. For firefighters, SDS provides essential pre-incident information included on inspections and fire plans. The SDS should contain the most complete available information about chemicals and compounds that are used, stored or manufactured on site. Information provided only by the manufacturer or the employer lacks objectivity. Third party evaluations are compiled in a variety of lists that are maintained by professional associations as well as mandated by California law.

In order for firefighters to maximize personal protection and avoidance of exposure, if any indication that a health hazard can possibly exist, that information should be provided. Include, as part of the SDS for inclusion in pre-incident planning for firefighters, health hazard information indicated for a chemical or compound in any legitimate, scientific study.

The draft revisions to section 5194, is missing the criteria on establishing standards of a source list. This removes the checks and balances on manufacturers that assure consistency in classification and reporting hazards. To standardize information provided to firefighters, CPF supports the use of source lists to identify hazards from third party studies and evaluations rather than manufacturers who have proprietary over safety concerns:

- American Conference of Government Industrial Hygienists (ACGIH)
- International Association on Cancer Research (IARC)
- National Toxicological Program (NTP), annual report on Carcinogens
- Permissible Exposure Limits (PEL)
- Prop 65 list
- The Hazardous Substance List; Title 8, Section 339, (also known as the Cal/OSHA Director's list, Labor Code section 6380)

CPF concern is for the potential occupational illness related to exposure to chemical and bio-hazards. Any information known about the hazards is a “right to know” issue for emergency responders to make proper personal protective equipment selections and post-exposure medical follow up. Firefighters use a “precautionary approach” for preventative exposure – “prudent avoidance” when possible. The more complete the information available before an emergency incident, the safer the operation for the public as well as the firefighters.