

## MEMORANDUM

**Via Electronic Mail**

**To:** Richard Krock

**FROM:** Lawrence P. Halprin and Diana Graham,  
Scientist

**DATE:** April 6, 2017

**RE:** March 7, 2017 Cal-OSHA HEAC Meeting

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On March 7, 2017, having addressed the modified PELs process during the previous Health Effects Advisory Committee (HEAC) meeting, Cal-OSHA held its first substantive meeting with the HEAC since the new PELs process was adopted. One of the agenda items was a review of the proposed PELs Priority List, which was adopted in 2008 and tentatively revised by Cal-OSHA in preparation for the March 7, 2017 meeting. We are pleased to report that, at the recommendation of the HEAC, Cal-OSHA determined that PVC dust would be moved from Priority 1 to Priority 2. The revised PELs Priority List has not yet been published, but Garrett Keating (the Cal-OSHA toxicologist heading up the PELs Update Process) advised me that is simply a formality. The primary reason for the change was, as stated by HEAC member Linda Morse, a recognition that the potential adverse health effects of concern associated with PVC are due to some of the substances added to PVC and not the pure PVC.

Given that reality, both Linda Morse and Garrett Keating (the Cal-OSHA toxicologist heading up the PELs Update Process) acknowledged that the development of a PEL for PVC would be challenging. When I spoke to Mr. Keating earlier today, he also indicated that Cal-OSHA believes there is a relatively limited amount of PVC fabrication activity in California, which would also support the decision to give PVC dust a lower priority in the PELs process.

During the March 7 meeting, there was some further discussion of the revised PELs Process procedures document, with some members wanting more detail; but in general, the Committee felt that the new document was acceptable. The next Cal-OSHA HEAC meeting is scheduled for June 20 and is expected to include discussions on aluminum (metal and insoluble), hydrogen sulfide, manganese (elemental and inorganic compounds), and methyl ethyl ketone.

We will continue to follow the Cal-OSHA PELs update process and let you know if the activity examines chemicals or other issues likely to be of interest to VI. Please let us know if you have any questions.