



February 27, 2018

To: Dr. Garrett Keating, Staff Toxicologist
Division of Occupational Safety and Health

Subject: HEAC Meeting: Hydrogen Sulfide

The above named organizations represent water and sanitation agencies that have potential exposure to hydrogen sulfide. Each of our agencies have expressed concerns about earlier proposals to reduce the permissible exposure limit (PEL) for hydrogen sulfide from 10 ppm to 1 ppm (8-hour time weighted average).

In our industry, the typical worker's exposure to hydrogen sulfide is normally for very brief periods of time ranging from 5 to 120 minutes on average. Most of these exposures are a result of periodic maintenance of sewer and water infrastructure systems and emergency calls. The sporadic and unplanned nature of these exposures makes it difficult to ascertain their time weighted averages. In addition, the water/wastewater industry has been using the 10 ppm standard for decades without documentation of adverse impacts on workers. Some agencies also estimate that they will incur costs that are not inconsequential in meeting a standard less than 10 ppm. Nevertheless, we are fairly certain that in general the new proposal of 5 ppm TWA will not require the use of respirators except on rare occasions.

Regarding the health science, we are pleased that the evaluation of hydrogen sulfide toxicity has taken a new course with greater acceptance in the literature.

Conclusion

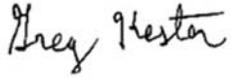
We appreciate the opportunity to provide comments on the Hydrogen Sulfide draft that will be presented to the HEAC committee on March 6, 2018. We still feel the 10 ppm standard is protective, but if it is to be reduced, we urge the division to maintain a PEL (8-hour TWA) of 5 ppm or greater. If you have further questions please contact me at (714) 765-4399.

Sincerely,

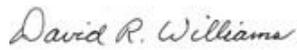
Bill Taylor, CSP, Legislative and Regulatory Representative
Public Agency Safety Management Association



Steve Jepsen, Executive Director
Southern California Alliance of POTWs



Greg Kester, Director of Renewable Resources
CA Association of Sanitation Agencies



David R. Williams, Executive Director
Bay Area Clean Water Agencies