



*Advancing public policy to  
improve the health and safety  
of workers and the community.*

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Occupational Safety & Health Standards Board  
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Dear Members of the Standards Board:

The California Industrial Hygiene Council (CIHC) wishes to take this opportunity to express its appreciation to the Cal/OSHA Division of Occupational Safety and Health (DOSH) and the Cal/OSHA Standards Board for facilitating the development of safety and health standards to protect California's workers.

Founded in 1990, the CIHC represents the occupational and environmental health profession in California and is affiliated with the national American Industrial Hygiene Association (AIHA), a 10,000 member organization, as well as the International Occupational Hygiene Association (IOHA), which represents the global community of Occupational Hygiene in over 34 countries. The CIHC formally comprises occupational and environmental health and safety professionals who are members of the five California AIHA local sections represented by the CIHC Board of Directors. Given its influence and good science over the years, its actual stakeholder group includes some 1800 EH&S professionals, most within California. Our members and their organizations are vitally interested in and impacted by regulatory changes to occupational health and safety standards. We have also been actively engaged with Cal/OSHA's PEL setting process for years through the HEAC and FAC review process.

The HEAC and FAC review process engages a broad range of industry and scientific experts (industrial hygienists, occupational physicians, and toxicologists) utilizing information from a range of sources that help ensure a comprehensive body of knowledge is evaluated. It allows the exposure limit setting process to function methodically, objectively, and transparently. A number of our members have raised concerns that the HEAC and FAC review process was not fully employed in determining the proposed DOSH exposure limit for hydrogen chloride.

We urge the Standards Board to consider the following actions:

- Restart the HEAC and FAC process, now absent for the past two years; and
- Withdraw the hydrogen chloride proposal and remand it to the HEAC for additional review

The CIHC and others are more than willing to assist with the PEL process and work with DIR, DOSH, and the Standards Board. If we can discuss this further, please contact Howard Spielman or Ron Hutton.

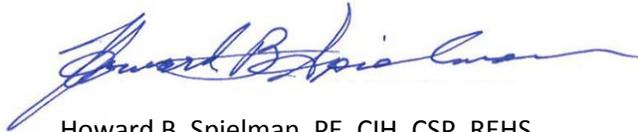
Sincerely,



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