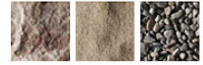


July 28, 2005

National Stone, Sand & Gravel Association



## **PMD leads response to proposed CaCO<sub>3</sub> exposure level reduction**

PMD has fired back at an ill-conceived proposal by the American Conference of Governmental Industrial Hygienists (ACGIH) to substantially lower calcium carbonate (CaCO<sub>3</sub>) exposure levels. The issue is critical because governmental agencies such as the Occupational Safety and Health Administration (OSHA) and Mine Safety and Health Administration (MSHA) often incorporate by reference standards recommended by ACGIH. If adopted, the new exposure levels could result in PMD members and their customers being forced to take costly and unnecessary precautions when handling your products.

In an effort to nip the problem in the bud, PMD members agreed this spring to a \$650 per company special assessment to hire two respected toxicologists to analyze the ACGIH proposal and prepare comments. PMD's response, which was joined by the National Lime Association (NLA) and the Industrial Minerals Association North American (IMA-NA), was submitted to ACGIH on July 7.

The essence of PMD's submission is that the proposed exposure level reduction is simply unjustified. ACGIH based its proposal solely on a recent German study that found an increase in nasal mucous clearance rates and a slight decrease in nasal airflow when volunteers were exposed to CaCO<sub>3</sub> dust at 5 mg/m<sup>3</sup>. In addition to the fact that neither of those outcomes reflects any irritant or adverse health effects, the study has several flaws in its methodology. Among these is the fact that the actual concentrations of CaCO<sub>3</sub> to which the volunteers were exposed are unknown. As a result, the study provides no basis for concluding that ACGIH's proposal to lower the current Threshold Limit Value – Time Weighted Average (TLV-TWA) for CaCO<sub>3</sub> from 10 mg/m<sup>3</sup> to 1 mg/m<sup>3</sup> would prevent the symptoms observed in the study.

Now we play the waiting game as the proposed change works its way through ACGIH's secretive internal processes. But at this point, one thing's for sure: We've given ACGIH something to think about. And, just as importantly, we've established a strong case for our position should we later have to take the issue to Congress or the courts.

John Hayden, NSSGA's vice president for environmental services, is spearheading PMD's work in this area. If you have any questions, please contact him at [jhayden@nssga.org](mailto:jhayden@nssga.org).

## **Final push on PMD economic survey: Have you responded?**

PMD is the middle of an aggressive effort to quantify the political and economic footprint of the pulverized CaCO<sub>3</sub> industry in the United States. The centerpiece of the project is a survey of PMD members. The survey results will help tell our industry's story to Capitol Hill, the executive branch, the media, and others as PMD gets more involved in the public policy process in the months ahead.

But for the survey project to be a success, the participation of all PMD members is critical.

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Unfortunately we haven't heard back from some of you. At this point, we've received responses from Omya, Franklin Industries, Greystone, Imerys, Imasco, Specialty Minerals, Linwood Mining and Minerals, Columbia River Carbonates, and J.M. Huber Corp. If your company is not listed, please fill out the survey and confidentiality agreement that was e-mailed along with this issue of *Newsline* and return it to Christian Klein at [caklein@potomac-law.com](mailto:caklein@potomac-law.com) (e-mail) or 703.739.9488 (fax) by the Aug. 1 survey deadline.

Remember that all survey responses will be held in the strictest of confidence and will only be released in aggregate form. Thanks for your involvement.