

AIHA's Position on Permissible Exposure Limits (PELs)

It is the position of the American Industrial Hygiene Association that:

1. Exposure limits such as OSHA's PELs are a primary tool in disease prevention and are an essential part of a comprehensive occupational safety and health program.
2. OSHA should seek whatever resources or legislative changes are needed to allow the updating of all existing PELs to current science and to set such new PELs as are necessary to protect worker health. In the meantime OSHA should select chemicals for PELs based on scientific principles and specific criteria developed with all stakeholders.
3. For compliance purposes OSHA has defined PELs as values not to be exceeded. However, when designing exposure monitoring programs employers must assign a statistical interpretation to the PEL. Therefore, OSHA should continue to provide guidance regarding suitable statistical interpretations so that the employers can design effective performance-based exposure monitoring programs that are consistent with OSHA's expectations.
4. OSHA should develop a peer-reviewed guideline for the derivation of PELs. AIHA believes that PELs must be based on the best scientific information available and must include a well-documented critical evaluation of the supporting information. AIHA also believes that appropriate uncertainty factors must be applied to compensate for the inherent uncertainties in the existing data and extrapolation to human populations.
5. Employers have the responsibility to assess the risks to the health of their workers and adequately control worker exposures to hazardous substances or agents for which there are no PELs. Employees must be fully consulted in the development of these risk assessments and informed of the results.
6. PELs should be consistent across occupational populations and should be accepted by other federal agencies when the goal is protecting occupational health.

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