

**Dragon, Karen E. (CDC/NIOSH/EID)**

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**From:** Morrison, Kristy [Kristy\_Morrison@americanchemistry.com]  
**Sent:** Friday, June 11, 2010 8:20 PM  
**To:** NIOSH Docket Office (CDC)  
**Subject:** Request for Technical Review of 22 Draft Skin Notation Assignment and Skin Notation Profiles; Docket Number NIOSH-153- A  
**Attachments:** NIOSH Comments on Skin Notation FINAL June 11 2011.pdf

Good Evening:

Attached to this email are The American Chemistry Council's Hydrogen Fluoride Panel (Panel) comments to the National Institute for Occupational Safety and Health (NIOSH) of the U.S. Centers for Disease Control and Prevention (CDC) on its public review of the draft skin notation and support technical documents, specifically the draft skin notation and support technical document for hydrogen fluoride/hydrofluoric acid (CAS # 7664-39-3).

If you have any questions regarding these comments, contact me at (703)741-5614 or via email at [Kristy\\_Morrison@americanchemistry.com](mailto:Kristy_Morrison@americanchemistry.com)

Sincerely yours,  
Kristy L. Morrison  
Manager  
Chemical Products & Technology Division  
American Chemistry Council  
1300 Wilson Boulevard  
Arlington, VA 22209 USA  
Office: 703-741-5614  
Mobile: 703-328-7037  
Fax: 703-741-6614



June 11, 2011

*Via electronic mail*

NIOSH Docket Office  
Robert A. Taft Laboratories MS-C34  
4676 Columbia Parkway  
Cincinnati, OH 45226

Re: Request for Technical Review of 22 Draft Skin Notation Assignment and Skin Notation Profiles;  
Docket Number NIOSH-153- A

Dear Sir or Madam:

The American Chemistry Council's Hydrogen Fluoride Panel (Panel) is pleased to provide comments to the National Institute for Occupational Safety and Health (NIOSH) of the U.S. Centers for Disease Control and Prevention (CDC) on its public review of the draft skin notation and support technical documents, specifically the draft skin notation and support technical document for hydrogen fluoride/hydrofluoric acid (CAS # 7664-39-3).

The Panel<sup>1</sup> represents major North American manufacturers and users of hydrofluoric acid. The Panel was chartered in 1988 to address issues relating to the use, transportation, emergency response, health effects, environmental impacts and regulation of Anhydrous Hydrogen Fluoride and Hydrofluoric Acid (collectively referred to as HF). Members of the Panel are committed to the responsible use and handling of hydrogen fluoride, improvement of tank car safety and the prevention of incidents resulting in releases.

The Panel believes that the skin notation profile document clearly outlines the systemic health hazards associated with and direct adverse effects on the skin following dermal exposures to hydrogen fluoride. Additionally, the rationale and logic behind the assignment of SK: SYS (FATAL) – DIR (COR) notations are clear and the Panel supports these designations.

Additionally, the Panel conducted a literature search which produced two additional references that may be of interest to NIOSH which have been published since December 2009. These references are included in Appendix A.

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<sup>1</sup> The following companies are members of the Hydrogen Fluoride Panel: Arkema, Inc.; Daikin America, Inc.; DuPont; Honeywell; Mexichem Fluor Sa. de CV.; and Solvay Fluorides.



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The Panel appreciates the opportunity to submit these brief comments. If you require additional information or have questions concerning hydrogen fluoride in general or these comments specifically, please contact me at (703) 741-5614, or by e-mail at [Kristy\\_morrison@americanchemistry.com](mailto:Kristy_morrison@americanchemistry.com)

Sincerely yours,

*Kristy L. Morrison*

Kristy L. Morrison, Manager  
Hydrogen Fluoride Panel  
Chemical Products & Technology Division

**APPENDIX A**

Rauber-Luthy, C and Kupferschmidt, H. 2010. Household Chemicals: Management of Intoxication and Antidotes. *EXS.*; 100:339-63.

Weinbruch S, *et al.* 2010. Hygroscopic properties of the workroom aerosol in aluminium smelter potrooms: a case for transport of HF and SO<sub>2</sub> into the lower airways. *J Environ Monit.* Feb;12(2):448-54.