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# Evaluation of Neurological Dysfunction among Workers Exposed to Trichloroethylene

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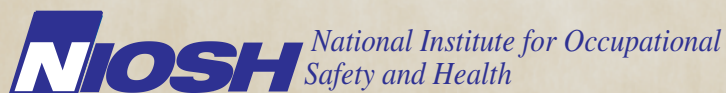
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Health Hazard Evaluation Report  
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March 2008

DEPARTMENT OF HEALTH AND HUMAN SERVICES  
Centers for Disease Control and Prevention



**The employer shall post a copy of this report for a period of 30 calendar days at or near the workplace(s) of affected employees. The employer shall take steps to insure that the posted determinations are not altered, defaced, or covered by other material during such period. [37 FR 23640, November 7, 1972, as amended at 45 FR 2653, January 14, 1980].**

# CONTENTS

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## REPORT

|   |     |
|---|-----|
| Abbreviations .....                                   | ii  |
| Highlights of the NIOSH Health Hazard Evaluation..... | iii |
| Summary .....   | iv  |
| Introduction.....                                     | 1   |
| Assessment.....                                       | 2   |
| Results and Discussion .....                          | 4   |
| Conclusions.....                                      | 16  |
| Recommendations.....                                  | 18  |
| References .....                                      | 19  |

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## APPENDIX A

|              |    |
|--------------|----|
| Tables ..... | 20 |
|--------------|----|

---

## APPENDIX B

|              |    |
|--------------|----|
| Methods..... | 29 |
|--------------|----|

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## APPENDIX C

|   |    |
|---|----|
| Occupational Exposure Limits & Health Effects ..... | 33 |
|---|----|

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## ACKNOWLEDGMENTS

|  |    |
|--|----|
| Acknowledgements and Availability of Report..... | 37 |
|--|----|

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## ABBREVIATIONS

|        |   |
|--------|---|
| ACGIH® | American Conference of Governmental Industrial Hygienists |
| AL     | Action level  |
| °C     | Degree Centigrade   |
| BEI®   | Biological exposure indices                               |
| cc/min | Cubic centimeters per minute                              |
| CTE    | Chronic toxic encephalopathy                              |
| dBA    | Decibels, A-scale   |
| FACT™  | Functional acuity contrast test                           |
| GA     | General area  |
| HETAB  | Hazard Evaluations and Technical Assistance Branch        |
| HEPA   | High-efficiency particulate air filter                    |
| HHE    | Health hazard evaluation                                  |
| Hz     | Hertz   |
| IARC   | International Agency for Research on Cancer               |
| mg/g   | Milligrams per gram                                       |
| mL     | Milliliter  |
| NAICS  | North American Industry Classification System             |
| NMAM   | NIOSH Manual of Analytical Methods                        |
| NIOSH  | National Institute for Occupational Safety and Health     |
| OEL    | Occupational exposure limit                               |
| OSHA   | Occupational Safety and Health Administration             |
| PBZ    | Personal breathing zone                                   |
| PEL    | Permissible exposure limit                                |
| ppm    | Parts per million   |
| REL    | Recommended exposure limit                                |
| SD     | Standard deviation  |
| SLM    | Sound level meter   |
| TCAA   | Trichloroacetic acid                                      |
| TCE    | Trichloroethylene   |
| TLV®   | Threshold limit value                                     |
| TWA    | Time-weighted average                                     |
| WHO    | World Health Organization                                 |

# HIGHLIGHTS OF THE NIOSH HEALTH HAZARD EVALUATION

**The National Institute for Occupational Safety and Health (NIOSH) received a technical assistance request from the Oregon Department of Human Services Environmental and Occupational Epidemiology office. It concerned reports of dementia and neurologic dysfunction among Entek International workers exposed to trichloroethylene (TCE). NIOSH investigators conducted site visits to Entek International and Entek Manufacturing in November 2004 and June 2005.**

## ***What NIOSH Did***

- We talked with workers about their exposure to TCE.
- We tested workers to see whether TCE exposure affected their vision, balance, manual dexterity, hand/eye coordination, and memory.
- We tested the workers' urine for trichloroacetic acid (TCAA), a TCE breakdown product.
- We took personal breathing-zone air samples for TCE.
- We measured noise exposures in the production area.

## ***What NIOSH Found***

- As a group, TCE-exposed workers did worse than unexposed workers in the vision, balance, and manual dexterity tests.
- Urinary TCAA levels among TCE-exposed workers were higher than the levels in the unexposed workers.
- Full-shift personal breathing zone TCE concentrations were below the Occupational Safety and Health Administration permissible exposure limit of 100 parts per million (ppm) but above the NIOSH recommended exposure limit (REL) of 25 ppm.
- Employees wore respirators when performing maintenance activities but not during routine work activities.
- Noise levels exceeded the NIOSH REL in several production departments.

## ***What Entek International Managers Can Do***

- Enclose the extrusion and extraction work areas and increase ventilation in the areas where TCE is used.
- Provide respirators for all production employees until ventilation can lower the TCE concentration below the NIOSH REL.
- Provide skin protection for production employees who handle TCE.

## ***What Entek International Employees Can Do***

- Wear a respirator during routine work activities in the production area.
- Wear hearing protection while working in any production area.
- Wear gloves (polyvinyl alcohol, Teflon™, Viton™, or other suitable material) when handling unfinished (i.e., "wet") battery separator material.



**Extruders, winders, rovers, team leads, and supervisors working in the battery separator production areas were overexposed to TCE. Almost half of those interviewed in these areas reported feeling high or lightheaded at work. Some of these employees also had central nervous system effects that were associated with TCE exposure, and levels of TCAA in their urine that were above recommended values. We recommend that battery separator production employees wear respirators until changes in the production process, ventilation, or work practices reduce airborne TCE concentrations to below the NIOSH REL. Workers should also wear gloves when handling unfinished (“wet”) separator material.**

On August 24, 2004, NIOSH received a technical assistance request from the Oregon Department of Human Services concerning dementia and neurologic dysfunction among workers exposed to TCE at Entek International in Lebanon, Oregon. In an initial NIOSH site visit in November 2004, NIOSH investigators found GA air concentrations of TCE ranging from 20 to 40 ppm in production areas. A medical questionnaire revealed that 48% of Entek International workers reported feeling high or lightheaded while at work in the last 30 days, compared to 19% of non-TCE-exposed workers at an adjacent facility, Entek Manufacturing.

In a follow-up site visit in June 2005, NIOSH investigators collected full-shift and shorter-term PBZ and GA air samples for TCE on study participants on all four production schedules over a one-week period. Noise exposures were also measured. The medical evaluation included a health questionnaire, five neurobehavioral tests (Grooved Pegboard, Postural Sway, Trail Making, Visual Contrast Sensitivity, and Symbol Color Recode), and biological monitoring for TCAA, a metabolite of TCE. Mean full-shift PBZ air concentrations for TCE were below the OSHA PEL of 100 ppm, but above the extended 12-hour work-shift adjusted NIOSH REL of 21 ppm for extruders, winders, rovers, team leads, and supervisors. Shorter-term (13 to 48 minutes) TCE exposures ranged from 30 to 445 ppm, with the highest concentrations occurring during line maintenance. Production employees wore elastomeric half-mask air-purifying respirators equipped with a combination organic vapor/HEPA filter cartridge during product changeover or line maintenance activities, but not typically during routine work activities. Noise levels exceeded the NIOSH REL in extrusion, winding, palletizing, maintenance, and utility/rover jobs (such as fork lift operators); radios in some work areas contributed to noise exposures. Most workers wore hearing protection (plugs or muffs).

Of 129 study participants, 82 were exposed to TCE. The groups were similar in age, but differed in average tenure and in education levels. The exposed group had a higher prevalence of former and current smokers, and consumed more alcoholic drinks on average than the unexposed. The TCE-exposed group had deficits in the following neurobehavioral tests compared to the non-exposed workers: lower visual contrast sensitivity scores for both eyes at 6 cycles per degree and at 12 cycles per degree for the right eye, a larger postural sway area for the most challenging test condition, and slower completion time in the Grooved Pegboard Test. The

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## SUMMARY (CONTINUED)

median urinary TCAA level in the exposed group was 50 mg/g creatinine (range: 0-223) compared to 0 mg/g creatinine (range: 0-2.2) in the unexposed. A total of 22 TCE-exposed participants (26.8%) had urinary TCAA levels over the ACGIH BEI (100 mg/g creatinine).

**Keywords:** NAICS 326199 all other Plastic Product Manufacturing, trichloroethylene, TCE, battery separators, TCAA, trichloroacetic acid, neurobehavioral, FACT, visual contrast sensitivity, postural sway, grooved pegboard, noise, respirators, hearing protection, central nervous system

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## INTRODUCTION

On August 24, 2004, NIOSH received a request for technical assistance from the Oregon Department of Human Services, Public Health Services, Environmental and Occupational Epidemiology office. The request concerned dementia and neurologic dysfunction among workers exposed to TCE at Entek International in Lebanon, Oregon. Following an initial survey at Entek International on November 1-3, 2004, we provided an interim letter dated April 8, 2005, to the State of Oregon and the company containing our preliminary results and a recommendation to perform additional testing at the Entek International facility. A follow-up survey was conducted in June 2005. Results from the industrial hygiene sampling were provided to the State of Oregon and Entek International in an interim letter dated November 28, 2005. Summary results from the urinary TCAA and neurobehavioral testing were provided to the State of Oregon and Entek International in a letter dated May 5, 2006. We also provided individual medical results separately to all study participants.

## Process Description

In 1987, Entek International began commercial production of its main product, microporous polyethylene battery separator material for lead-acid battery applications. Low electrical resistance, strength, flexibility, high puncture resistance, and consistent quality (the absence of pinholes) are all critical in producing effective battery separators. Battery separator material is produced by mixing ultra-high density polyethylene polymer and amorphous silica in mineral oil. This mixture is extruded into a flat sheet, and the excess oil is removed from the product by using TCE in a patented extraction process. This extraction process precisely removes excess oil from the separator sheet, leaving only the oil percentage required for optimum separator performance. The battery separator material is placed in an oven to remove any excess TCE, and the final product is wound onto rolls for shipment (Photo 1). Job titles in the production areas include extruder, winder, rover, utility, pelletizer, cut-to-fit, and maintenance. During both NIOSH surveys production employees (except rovers, utility, and maintenance) were typically assigned to one production line for an entire shift.

Photo 1: Roll of Battery Separator Material



Much of the manufacturing process is enclosed within ventilated metal cabinets, and most of the TCE used to remove the oil from

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## INTRODUCTION (CONTINUED)

the battery separator material is recycled. However, based on historical data collected by Entek International, airborne TCE concentrations have ranged from approximately 20 to 40 ppm near the work stations of the employees involved in battery separator manufacturing.

At the time of this evaluation, Entek International employed 142 workers as production and maintenance workers, shippers, laboratory technicians, floor supervisors, and office personnel. Battery separator production operated 24 hours a day, 7 days a week, with four work schedules. Employees on schedules 1 and 2 worked 12-hour shifts Sunday through Tuesday and a 6-hour shift on Wednesday. Workers on schedules 3 and 4 worked a 6-hour shift on Wednesday and 12-hour shifts Thursday through Saturday.

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## ASSESSMENT

### Initial Survey

An initial survey at Entek International was conducted on November 1–3, 2004. Following an opening conference and walk-through tour of the facility, investigators collected TCE samples in manufacturing areas by using direct reading colorimetric detector tubes, used sound level meters to measure noise levels, and administered a medical questionnaire. The medical questionnaire collected information on basic demographics, job and medical history, and acute and chronic neurobehavioral symptoms. Questionnaires were administered to all eligible employees in the production area of Entek International who were potentially exposed to TCE. For a comparison group of TCE-unexposed workers, the questionnaire was also given to employees at Entek Manufacturing, an adjacent company that designed and built all the manufacturing, processing, and tooling equipment used at Entek International. Only Entek International production employees worked on a production shift rotation. Entek Manufacturing employees worked a Monday through Friday 8-hours/day work schedule. The initial survey findings prompted NIOSH investigators to conduct a follow-up survey to more completely characterize TCE exposures and determine if neurobehavioral abnormalities were associated with TCE exposure.

### Follow-up Survey

A follow-up survey was conducted on June 19–26, 2005. Full-shift PBZ air samples were collected for TCE on 82 exposed participants on all four production shifts over a one-week period.

Job titles sampled included extruder, winder, maintenance, rover, utility, pelletizer, and cut-to-fit (a job producing small quantities of custom-sized battery separators). In addition, shorter-term task-based air samples for TCE (sampling times ranging from 13 to 48 minutes) were collected during activities such as line maintenance and product line change-over. Higher TCE concentrations were anticipated during these activities based on a review of historical data collected by the company. GA air samples were collected to evaluate any potential TCE exposure for the unexposed group. All air samples for TCE were collected on activated charcoal tubes according to NMAM Method 1022. Noise exposures, using both SLMs and noise dosimeters, were collected on Entek International workers in job categories similar to those listed for the TCE air sampling. Appendix B describes the air and noise sampling methods used in this evaluation.

The exposure groups were determined by employee job titles and area of the facility where the employees worked. Workers in the exposed group included production employees who had daily direct exposure to TCE for their full shift. Workers in the unexposed group included office and production employees from Entek Manufacturing and office workers from Entek International, none of whom had TCE exposure. Workers with daily indirect exposure or intermittent exposure were excluded from the evaluation. All participants completed a questionnaire that collected information on work history, medical history, and personal characteristics. Participants' urine was analyzed for a metabolite of TCE (urinary TCAA). Finally, each participant completed the following neurobehavioral tests:

1. Grooved Pegboard Test—manual dexterity
2. Postural Sway—postural stability
3. Trail Making—eye-hand coordination
4. Symbol Color Recode—psychomotor function and implicit learning
5. FACT™—visual contrast sensitivity and visual search

The medical questionnaire, the five neurobehavioral tests, and biological monitoring for TCAA are discussed in greater detail in Appendix B.

## Statistical Analysis

SAS Version 9.1.3 software (SAS Institute, Cary, North Carolina) was used for the statistical analyses. Results with p-values less than or equal to 0.05 were considered statistically significant. Because distributions of some of the continuous outcome variables were skewed, a log transformation was applied when it helped to satisfy statistical model assumptions. Regression models were constructed to examine possible relationships between exposure to TCE and the measures for each neurobehavioral test while controlling for potential confounders (variables that could affect the exposure/outcome relationship). Chi-square or Fisher's exact tests were used to compare the prevalence of symptoms between exposure groups.

## RESULTS AND DISCUSSION

### Initial Survey

TCE concentrations from short-term area air samples ranged from 20 to 40 ppm along the extruding, extracting, and winding areas of several production lines and were similar to the historical air sampling data collected by the company. Although all Entek International employees were part of a respiratory protection program, they were not required to wear organic vapor respirators in the production areas.

Questionnaires were administered to 42 eligible employees in the production area of Entek International, which is 100% of employees present on the days of the survey. The demographics for these workers are shown in Table 1.

|  | Entek Inter.<br>(n=42) | Entek Mfg.<br>(n=16) |
|--|------------------------|----------------------|
| Participation Rate                                 | 98%                    | 89%                  |
| Age (mean years)                                   | 40.3                   | 31.3                 |
| Years at Entek (mean)                              | 11.6                   | 3.7                  |
| Male   | 100%                   | 100%                 |
| Alcohol Consumption in past 30 days                |                        |                      |
| # of days w/at least one drink (mean)              | 5.6                    | 10.0                 |
| # of drinks on an occasion (mean)                  | 2.4                    | 2.6                  |
| # times had 5 or more drinks on an occasion (mean) | 1.3                    | 3.1                  |
| Smoking Status                                     |                        |                      |
| Never  | 38%                    | 33%                  |
| Former   | 46%                    | 30%                  |
| Current  | 17%                    | 38%                  |

## RESULTS AND DISCUSSION

(CONTINUED)

Sixteen Entek Manufacturing employees with no TCE exposure were chosen as a comparison group. As shown in Table 2, the medical questionnaire revealed that 48% of Entek International workers, when asked about a variety of symptoms experienced during the workday over the last 30 days at work, reported feeling high or lightheaded, compared to 19% of Entek Manufacturing workers ( $p<0.05$ ).

Table 2. Prevalence of Acute Symptoms Experienced during the Workday (Initial Survey)

|                            | Entek Inter.<br>(n=42) | Entek Mfg.<br>(n=16) |
|----------------------------|------------------------|----------------------|
| Headache                   | 41%                    | 38%                  |
| Lightheaded or high        | 48%*                   | 19%*                 |
| Tired                      | 57%                    | 56%                  |
| Difficulty concentrating   | 17%                    | 19%                  |
| Trouble remembering things | 19%                    | 31%                  |
| Confusion                  | 14%                    | 19%                  |
| Irritable                  | 41%                    | 44%                  |
| Incoordination             | 12%                    | 13%                  |
| Loss of muscle strength    | 10%                    | 13%                  |

\*indicates a significant difference ( $p<=0.05$ ).

In addition, when asked about symptoms experienced in the last 30 days, but not limited to the workplace, Entek International workers reported feeling high from chemicals at work, lightheadedness or dizziness, heart palpitations, difficulty falling asleep, difficulty driving home because of dizziness or tiredness, and a lower tolerance for alcohol significantly more frequently than Entek Manufacturing workers (see Table 3).

## RESULTS AND DISCUSSION

(CONTINUED)

Table 3. Prevalence of Symptoms Experienced in the Past 30 Days (Initial Survey)

| Symptoms  | Entek Inter.<br>(n=42) | Entek Mfg.<br>(n=16) |
|---|------------------------|----------------------|
| Tire more easily  | 38%                    | 25%                  |
| Lightheaded or dizzy  | 45%                    | 19%                  |
| Difficulty concentrating                                      | 29%                    | 6%                   |
| Confused or disoriented                                       | 14%                    | 0%                   |
| Trouble remembering things                                    | 31%                    | 31%                  |
| Relatives noticed problem with memory                         | 17%                    | 13%                  |
| Make notes to remember things                                 | 38%                    | 44%                  |
| Difficulty understanding meaning of printed materials         | 14%                    | 13%                  |
| Felt irritable  | 60%                    | 50%                  |
| Felt depressed  | 41%                    | 19%                  |
| Heart palpitations  | 31%                    | 6%                   |
| Seizure   | 0%                     | 0%                   |
| Sleeping more often   | 26%                    | 13%                  |
| Difficulty falling asleep                                     | 36%*                   | 6%*                  |
| Incoordination or loss of balance                             | 19%                    | 0%                   |
| Loss of muscle strength in legs or feet                       | 14%                    | 0%                   |
| Loss of muscle strength in arms or hands                      | 7%                     | 6%                   |
| Difficulty moving fingers or grasping things                  | 19%                    | 6%                   |
| Numbness or tingling in fingers                               | 12%                    | 6%                   |
| Numbness or tingling in toes                                  | 2%                     | 0%                   |
| Headaches at least once a week                                | 38%                    | 25%                  |
| Difficulty driving home from work because felt dizzy or tired | 31%*                   | 0%*                  |
| Felt high from chemicals at work                              | 52%*                   | 0%*                  |
| Lower tolerance for alcohol                                   | 26%*                   | 0%*                  |

\* indicates a significant difference ( $p < 0.05$ ).

## Follow-up Survey

### TCE Exposure

Over 7 consecutive days a total of 274 PBZ air samples were collected. Figure 1 displays the mean PBZ TCE exposures by work schedule, while Table 4 summarizes the mean TCE concentrations by job title.

As shown in Figure 1, the higher average exposures measured on work schedules 1 and 2 during the first day of this evaluation (Sunday) are likely due to line maintenance activities that occurred during these shifts that required replacing roller bearings and rethreading new material onto take-up spools. While these line maintenance activities could result in much higher shorter-term TCE exposures for some extruders and winders (see Table 5), mean

## RESULTS AND DISCUSSION

(CONTINUED)

TCE exposures among all battery separator production employees were similar, ranging from 28 to 37 ppm, TWA over a 12-hour work schedule.

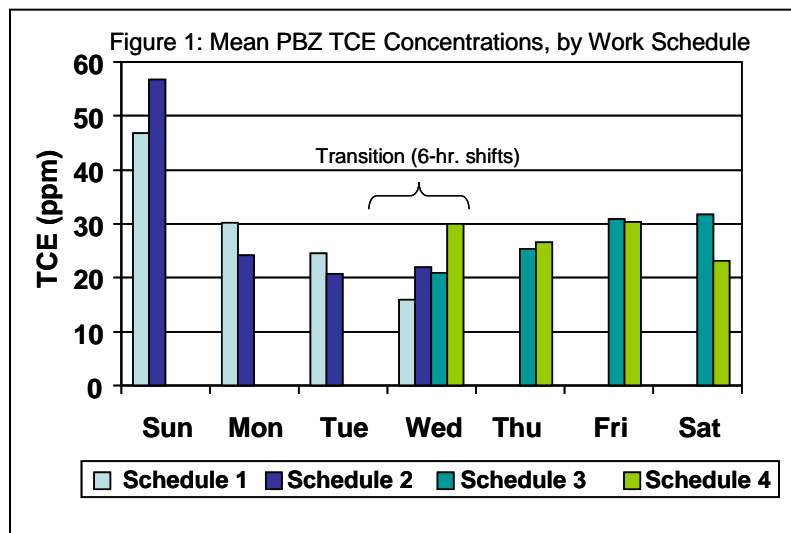


Table 4. Full Shift TWA TCE Exposures, by Job Category

| Job         | Number | TCE Concentration (ppm) |        |           |
|-------------|--------|-------------------------|--------|-----------|
|             |        | Mean                    | Median | Range     |
| Extruder    | 74     | 37                      | 34     | 1.7 – 130 |
| Winder      | 89     | 33                      | 28     | 12 – 89   |
| Maintenance | 31     | 15                      | 15     | 3.7 – 52  |
| Rover       | 15     | 33                      | 26     | 12 – 58   |
| Team Lead   | 21     | 35                      | 30.    | 18 – 82   |
| Supervisor  | 11     | 28                      | 20.    | 11 – 98   |
| Pelletizer  | 12     | 11                      | 9.0    | 4.0 – 30. |
| Utility     | 17     | 12                      | 8.7    | 3.9 – 29  |
| Cut-to-size | 4      | 3.1                     | 2.7    | 2.0 – 4.8 |
| NIOSH REL   |        | 25 *                    |        |           |
| OSHA PEL    |        | 100                     |        |           |

One sample was collected during rewinding, an infrequently performed activity. The rewinding operator was exposed to a TCE concentration of 13 ppm, TWA.

\* The NIOSH REL is for occupational exposures up to 10 hours. Adjusted for a 12-hour work shift, the REL is reduced to 21 ppm.

Table A1 (see Appendix A) lists the results from the 517 individual air samples collected during the follow-up evaluation, arranged by job, shift, and day. In most instances TCE-exposed study participants had two PBZ air samples collected over their 12-hour work shift. This was done to avoid overloading the charcoal tubes used to collect TCE. For each participant, results from both tubes were combined to calculate an overall TWA for the entire work shift.

A total of 16 shorter-term PBZ air samples (sample times ranged from 13 to 48 minutes) were collected during non-routine work



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## RESULTS AND DISCUSSION

(CONTINUED)

tasks (Table 5); the sampling time varied depending on the work activity performed. The highest TCE air concentration (450 ppm) was measured on an extruder operator removing transition roller bearings on Line 8. This activity required the extruder operator to open the side panels on Line 8 and reach inside to access the bearings.

Entek International had a respiratory protection program, and elastomeric half-mask air-purifying respirators equipped with a combination organic vapor/N100 filter cartridge were available (but not required) during routine work activities. The company did require that Entek International production workers use these respirators during a product changeover or when performing line maintenance activities. The extruder operator working on Line 8 was observed correctly wearing this type of respirator during this maintenance activity. However, this type of respirator, when correctly worn, only provides protection to TCE concentrations up to 250 ppm, based on a protection factor of 10. The minimum level of respiratory protection from a TCE exposure of 450 ppm is an elastomeric full-face air purifying respirator equipped with an organic vapor cartridge.

Production employees occasionally handled unfinished (i.e., “wet”) battery separator material that contained a higher percentage of TCE than the final product during product changes or line maintenance activities. Some workers wore gloves (cloth or nitrile) during these activities.

No airborne TCE was measured in the non-exposed work areas (Entek International office area and Entek Manufacturing office and manufacturing areas), based on the results from 16 GA air samples collected during the follow-up survey. The minimum detectable TCE concentration for sampling conducted in these non-exposed work areas was 0.10 ppm.

At the time of this evaluation, Entek International had an engineering plan underway to reduce TCE exposures. The multi-year plan consisted of installing additional local exhaust and general ventilation in the battery separator production area and building walls to separate the extrusion, extraction, and winding sections of the production lines.

# RESULTS AND DISCUSSION

(CONTINUED)

Table 5. Shorter-term TCE exposures, by Job Task

| Job       | Line No. | Activity   | Time (min.) | TCE (ppm) |
|-----------|----------|--|-------------|-----------|
| Winder    | 3        | Line start-up following maintenance                        | 48          | 89        |
| Extruder  | 3        | Line start-up following maintenance                        | 44          | 59        |
| Winder    | 8        | Line start-up, collecting excess material at winding end   | 45          | 95        |
| Extruder  | 8        | Line start-up, collecting excess material at extrusion end | 40          | 120       |
| Winder    | 7        | Assisting Line 8 operators in start-up                     | 37          | 160       |
| Extruder  | 8        | Line start-up, extraction doors open, raised tank covers   | 16          | 68        |
| Winder    | 8        | Line start-up, threading new material onto spools          | 17          | 64        |
|           |          | Line start-up, threading new material onto spools          | 19          | 80.       |
|           |          | Line start-up, threading new material onto spools          | 20          | 48        |
| Team Lead | 1        | Change-over to new product, line not yet running           | 16          | 30.       |
| Winder    | 1        | Line start-up  | 26          | 37        |
|           |          | Line start-up, threading new material onto spools          | 22          | 59        |
| Extruder  | 8        | Line maintenance, transition roller at extractor and dryer | 33          | 220       |
|           |          | Line maintenance, removing transition roller               | 13          | 450       |
|           |          | Line maintenance, replacing transition roller bearings     | 27          | 67        |
|           |          | Line maintenance, reinstalling transition roller           | 14          | 47        |

Note: Respiratory protection (NIOSH-approved half face-piece respirators with combination organic vapor cartridges and N100 filters) were worn by employees performing these short-term activities.

## Noise

Instantaneous noise monitoring results are shown in Table 6. Noise levels around the extruders were higher than in the adjacent winding areas. The regrind operation, which was only performed intermittently when scrap material needed to be recycled, was the loudest activity, followed by the pelletizer operation. The highest noise levels in line 3 and 4 winder areas were attributed to radios on employee work desks.

Table 6. Noise Levels

| Area/Activity       | dBA   | Comments                           |
|---------------------|-------|------------------------------------|
| Regrind             | 95–97 | This job is performed infrequently |
| Extruder, Line 8    | 85–87 |                                    |
| Extruder, Line 7    | 82–85 |                                    |
| Extruder, Line 2    | 88–91 | At work desk 87–88 dBA             |
| Extruder, Line 1    | 88–94 | At work desk 87–88 dBA             |
| Winder, Lines 7 & 8 | 78–80 | Radio on work desk 89 dBA          |
| Winder, Lines 3 & 4 | 80–82 | Radio on work desk 85 dBA          |
| Winder, Lines 1 & 2 | 75–76 | No radio in winder area            |

## RESULTS AND DISCUSSION

(CONTINUED)

Table 7 contains the results from 35 full-shift personal noise dosimetry samples collected on the following job tasks: extrusion, winding, palletizing, regrind, maintenance, team lead, supervisor, rover, and forklift. These dosimeters integrated noise exposure data using both NIOSH and OSHA criteria (see Appendix C). Fourteen of the 35 samples exceeded the OSHA action level, four samples exceeded the OSHA PEL, and 28 samples exceeded the NIOSH REL. A complete listing of the personal noise dosimeter results is shown in Table A2 (see Appendix A).

| Job         | No. of Samples | Noise Dose % |          |           |          | Comment  |
|-------------|----------------|--------------|----------|-----------|----------|--|
|             |                | OSHA PEL     | % > PEL  | NIOSH REL | % > REL  |  |
| Extruder    | 9              | 3.4 – 107    | 1 (11%)  | 40 – 736  | 8 (89%)  | These noise dose percentages are accumulated during a work day, with 100% representing the maximum allowable daily dose. |
| Winder      | 10             | 5.7 – 31     | 0        | 68 – 276  | 7 (70%)  |  |
| Maintenance | 3              | 11 – 19      | 0        | 102 – 141 | 3 (100%) |  |
| Team Lead   | 3              | 14 – 24      | 0        | 118 – 216 | 3 (100%) |  |
| Pelletizer  | 3              | 106 – 154    | 3 (100%) | 560 – 755 | 3 (100%) |  |
| OSHA PEL    |                | 100          |          |           |          |  |
| NIOSH REL   |                |              |          | 100       |          |  |

### Questionnaire

The two exposure groups were determined by an employee roster coded by the company. Workers chosen for the TCE-exposed group were reported to have a daily direct exposure for three 12-hour shifts and one 6-hour shift. Workers in the TCE-unexposed group were reported to have no exposure to TCE. Workers with daily indirect exposure or intermittent exposures were excluded from the study. As shown in Table 8, of the 129 participants in the study, 82 were exposed to TCE. The participation rate was 67.9%.

The groups were similar in age, but differed by the number of years at Entek. The groups were different in education levels, with the unexposed group attaining a higher educational level than the exposed group. The exposed group also had higher prevalences of former and current smoking. The exposed group consumed a median of 12 alcoholic drinks in the last 30 days compared to 4 drinks for the unexposed.

## RESULTS AND DISCUSSION

(CONTINUED)

Table 8: Personal Characteristics, by Exposure Group

|   | Unexposed (n=47*) | Exposed (n=82*) |
|---|-------------------|-----------------|
| Age (mean years)  | 40.3              | 41.1            |
| Years at Entek (median)                                 | 6                 | 12.5            |
| Work hours per week (median)                            | 42                | 42              |
| # of alcoholic drinks consumed in last 30 days (median) | 4                 | 12              |
| Male  | 68%               | 100%            |
| Education   |                   |                 |
| Less than high school                                   | 0%                | 2%              |
| High school diploma                                     | 9%                | 50%             |
| Some college  | 49%               | 40%             |
| College degree or higher                                | 43%               | 7%              |
| Smoking status (cigarettes, cigars, pipes)              |                   |                 |
| Never   | 72%               | 46%             |
| Former  | 17%               | 28%             |
| Current   | 11%               | 26%             |
| Diabetes  | 2%                | 7%              |
| Hypertension  | 11%               | 10%             |
| Glaucoma  | 0%                | 0%              |
| Cataracts   | 0%                | 1%              |
| Other eye problems                                      | 9%                | 4%              |
| Eye surgery   | 2%                | 2%              |
| Corrective lenses for reading                           | 50%               | 43%             |
| Colorblind  | 6%                | 15%             |
| Head Injury   | 11%               | 22%             |

\*Sample size ranged from 46-47 for the unexposed and 81-82 for the exposed due to missing data.

### **Urinary TCAA**

The median creatinine-adjusted urinary TCAA level in the TCE-exposed group was 50 mg/g (range: 0–223) compared to 0 mg/g creatinine (range: 0–2.2) in the unexposed ( $p < 0.01$ ). Levels of TCAA in the general population are  $< 5$  mg/g creatinine. A total of 22 TCE-exposed participants (27%) had urinary TCAA levels over the ACGIH BEI (100 mg/g creatinine adjusted). Creatinine is used to adjust for the varying density in urine samples. Urinary TCAA levels in the exposed group were significantly correlated with PBZ TCE levels ( $r = 0.48$ ,  $p < 0.01$ ).

### **Grooved Pegboard**

The adjusted mean grooved pegboard completion times were significantly longer for the exposed group (98.3 seconds) than the unexposed group (82.1 seconds,  $p < 0.01$ ). We adjusted for age, gender, education level, head injury, diabetes, and alcohol consumption in last 30 days.

The finding that TCE-exposed workers performed this test significantly slower than unexposed workers is consistent with a study of toluene-exposed women [Foo et al. 1990] and persons

## RESULTS AND DISCUSSION

(CONTINUED)

chronically exposed to TCE-contaminated well water [Kilburn and Warshaw 1993].

### **Postural Sway**

The postural sway variables were log-transformed due to the skewed distribution of the data. After controlling for the effects of height, weight, foot length, age, alcohol consumption in last 30 days, history of head injury, and diabetes, we found a significant relationship between exposure to TCE and the sway area on the most demanding condition only (soft foam surface-eyes closed condition), with the exposed having a greater sway area than the unexposed ( $p=0.05$ ). There was no difference in the measured sway length between the exposed and unexposed groups in the soft foam surface-eyes closed condition. There were no significant differences between exposed and unexposed groups for the postural sway area and length for the other three test conditions (hard surface-eyes open; hard surface-eyes closed; and soft surface-eyes open).

The finding that TCE-exposed workers in this evaluation had a

Table 9. Postural Sway Results

| Test Condition           | Exposure Group | Mean Postural Sway  |            |                      |           |
|--------------------------|----------------|---------------------|------------|----------------------|-----------|
|                          |                | Area                | $p$ -value | Length               | $p$ value |
| Hard surface-eyes open   | Exposed        | 2.5 cm <sup>2</sup> | 0.33†      | 34.1 cm <sup>2</sup> | 0.80†     |
|                          | Unexposed      | 2.8 cm <sup>2</sup> |            | 34.6 cm <sup>2</sup> |           |
| Hard surface-eyes closed | Exposed        | 3.4 cm <sup>2</sup> | 0.58†      | 49.2 cm <sup>2</sup> | 0.72†     |
|                          | Unexposed      | 3.6 cm <sup>2</sup> |            | 50.5 cm <sup>2</sup> |           |
| Soft surface-eyes open   | Exposed        | 4.3 cm <sup>2</sup> | 0.27†      | 48.8 cm <sup>2</sup> | 0.08†     |
|                          | Unexposed      | 3.9 cm <sup>2</sup> |            | 45.0 cm <sup>2</sup> |           |
| Soft surface-eyes closed | Exposed        | 9.6 cm <sup>2</sup> | 0.05‡*     | 71.6 cm <sup>2</sup> | 0.17†     |
|                          | Unexposed      | 7.7 cm <sup>2</sup> |            | 78.3 cm <sup>2</sup> |           |

† Adjusting for height, weight, foot length, age, alcohol consumption, head injury, and diabetes.

‡ Adjusting for height and age.

\* Indicates a significant difference ( $p \leq 0.05$ ).

significantly larger sway area for the most challenging condition (soft surface-eyes closed) differs from a study of sewer workers exposed to solvents that found significant differences for the hard surface-eyes closed and soft surface-eyes open conditions [Kuo et al. 1996]. In that study, postural sway was significantly correlated with urinary TCAA levels in the easiest testing condition (hard surface-eyes open).

### **Trail Making A and B**

The time measurements for forms A and B were log transformed to provide a more normal distribution of the data for analysis.

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## RESULTS AND DISCUSSION

(CONTINUED)

No significant differences were found between the exposed and unexposed groups. The geometric mean Trail Making A time was 22.7 seconds for the exposed group and 21.1 seconds for the unexposed group ( $p=0.31$ ) after adjusting for age, history of head injury, educational attainment, and alcohol consumption. A similar result was obtained for the Trail Making B time, with an adjusted geometric mean of 50.7 seconds for the exposed compared to 48.5 seconds for the unexposed ( $p=0.62$ ).

A study of 42 men with long-term (average 25 years) exposure to organic solvents found that declining performance on Trail Making Test B related to exposure duration [Ellingsen et al. 1997]. Significant differences were found between toluene-exposed female workers and controls for the Tests [Foo et al. 1990]. Although we did not find a significant difference between groups for either the Trail Making A or B tests, the mean time on both tests for the exposed was longer than for the unexposed group. It is possible that the changes in the exposed group were so subtle that neither Trail Making Test was able to detect them.

### ***Visual Contrast Sensitivity***

Five participants were excluded from this analysis because of previous eyes surgeries, macular degeneration, or eye injury. After controlling for diabetes, head injury, age, current cigarette smoking, and alcohol consumption in last 30 days, there was a significant difference between the exposed and unexposed groups at a spatial frequency of 6 cycles per degree for both eyes, with the exposed having lower scores than the unexposed (see Table 10). After controlling for the effects of diabetes, history of head injury, age, current cigarette smoking, and alcohol consumption in the last 30 days, we found no statistically significant relationship between TCE exposures and contrast sensitivity scores at spatial frequencies 1.5, 3, 12, and 18 cycles per degree. Cycles per degree refers to the number of alternating light and dark bands within one degree of visual angle. Contrast refers to the difference in intensity (expressed as a percent) between the light and dark bands, with white to black having a 100% contrast.

# RESULTS AND DISCUSSION

(CONTINUED)

Table 10. Adjusted Mean Visual Contrast Sensitivity Scores by Exposure Group\*

| Spatial frequencies<br>[cycles per degree] | Group     | Left Eye |              | Right Eye |              |
|--|-----------|----------|--------------|-----------|--------------|
|  |           | Mean     | p-value      | Mean      | p-value      |
| 1.5  | Exposed   | 78.6     | 0.10†        | 82.2      | 0.59‡        |
|  | Unexposed | 86.2     |              | 84.6      |              |
| 3  | Exposed   | 129.3    | 0.14†        | 127.4     | 0.73         |
|  | Unexposed | 139.6    |              | 130.0     |              |
| 6  | Exposed   | 122.1    | <b>0.05†</b> | 115.0     | <b>0.03†</b> |
|  | Unexposed | 139.4    |              | 136.8     |              |
| 12   | Exposed   | 55.9     | 0.12†        | 53.5      | <b>0.04‡</b> |
|  | Unexposed | 66.2     |              | 68.0      |              |
| 18   | Exposed   | 25.4     | 0.34†        | 22.5      | 0.19†        |
|  | Unexposed | 29.3     |              | 27.8      |              |

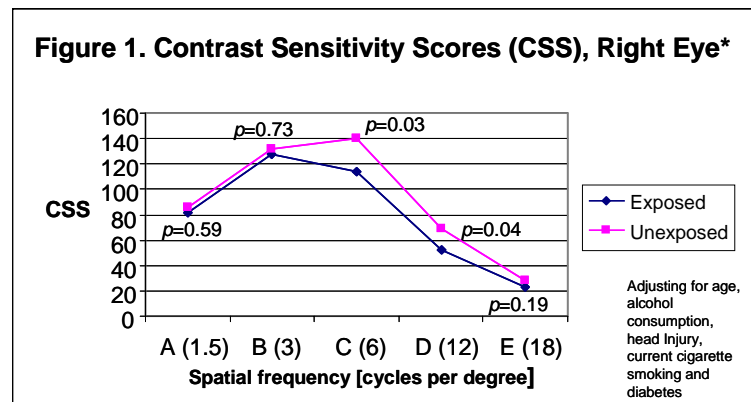
Comment: Values that differ significantly are shown in bold font.

\* Sample sizes for analyses ranged from 114–115.

† Controlled for diabetes, head injury, age, current cigarette smoking, and alcohol consumption in last 30 days.

‡ Controlled for current cigarette smoking.

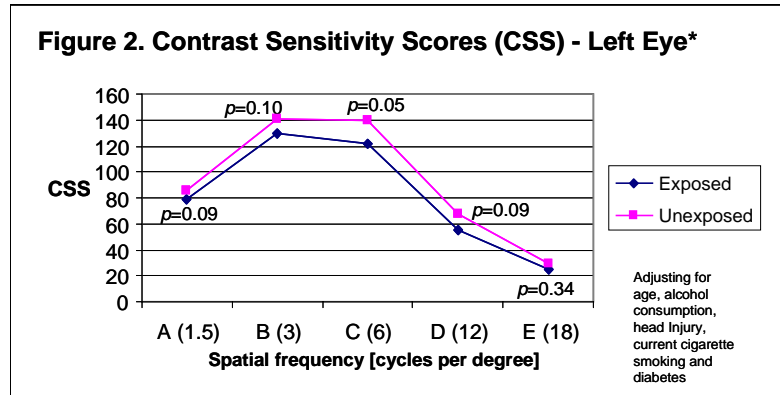
As shown in Figures 1 and 2, statistically significant relationships were found between TCE exposures and contrast sensitivity scores at spatial frequencies 6 (left and right eyes) and 12 (right eye only). Because the contrast sensitivity score for the right eye of 12 cycles per degree approached statistical significance, we did additional modeling to remove potential confounders that had no meaningful effect on the relationship between TCE exposure and contrast sensitivity scores. After removing the unnecessary potential confounders this relationship became significant (p=0.04).





## RESULTS AND DISCUSSION

(CONTINUED)



Similar results have been reported in workers exposed to a mixture of organic solvents [Gong et al. 2003]. In a study evaluating cumulative styrene exposure and visual functions, significant contrast sensitivity deficits in the intermediate spatial frequencies were found among those in the upper cumulative exposure group (as with this evaluation), but no relation between bio-indicators of current exposure and contrast sensitivity loss were found [Castillo et al. 2001]. This suggests that contrast sensitivity loss reflects long-term cumulative exposure and chronic damage to the neuro-optic pathways. Other researchers found that people exposed to the highest levels of TCE through a municipal water supply (>15 parts per billion) performed significantly worse on the contrast sensitivity tests and had higher mean scores for confusion, depression, and tension than unexposed controls [Reif et al. 2003]. This study concluded that there was evidence that long-term exposure to low concentrations of TCE is associated with neurobehavioral deficits. It has also been hypothesized that the intermediate spatial frequency channel neurons in the visual system may be more vulnerable to organic solvent toxicity than those of low or high spatial frequency [Boeckelmann and Pfister 2003].

### **Symbol Color Recode Test**

After adjusting for age, diabetes, head injury, current cigarette smoking, and alcohol consumption in last 30 days, there was no significant difference between the exposure groups in their reaction times ( $p=0.56$ ) or number of correct responses ( $p=0.73$ ) for test 1. The results were similar for the reaction times ( $p=0.99$ ) and number of correct responses ( $p=0.16$ ) for test 2.

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## RESULTS AND DISCUSSION

(CONTINUED)

Because the symbol color recode test used in this study is a new test designed by NIOSH researchers, comparison findings are not available. The hypothesis behind the development of this test is that the subtle effects of low-level chemical exposures on the nervous system may be revealed in tests of higher cognitive functions such as implicit learning. The symbol color recode test is similar to the Digit Symbol Test and Symbol Digit Modalities Test, but reduces the motor component of these tests by pairing symbols with colored keys on a separate keypad (rather than pairing symbols with numbers, that require participants to hand-write during the recode task). While other researchers did find significantly poorer performance on the digit symbol test in people who were exposed to TCE in a municipal water supply [Reif et al. 2003], the lack of significant results in this HHE may suggest that there is no relationship with TCE exposure. However, it was also observed that the subtle manipulation of this unvalidated test, designed to test implicit learning of the symbol-color pairings, had been unintentionally communicated to participants in both groups. This effectively negated the potential sensitivity of this measure.

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## CONCLUSIONS

NIOSH investigators determined that most battery separator production employees were exposed to airborne concentrations of TCE above the extended work shift-adjusted NIOSH REL of 21 ppm in five job categories evaluated: extruder, winder, rover, team lead, and supervisor. While levels for some individual production employees exceeded the OSHA PEL of 100 ppm, none of the mean full-shift PBZ air concentrations (by job category) exceeded this limit. Results from shorter-term PBZ exposures for TCE ranged from 30 to 445 ppm, with the highest concentrations occurring during roller maintenance activities on Line 8.

A medical questionnaire revealed that 48% of Entek International workers reported feeling high or lightheaded while at work in the last 30 days, compared to 19% of non-TCE-exposed workers at an adjacent facility, Entek Manufacturing. We found statistically significant evidence of neurobehavioral deficits in three of the five tests administered to Entek International workers which we associated with their TCE exposure. These deficits were lower visual contrast sensitivity scores in the intermediate spatial frequencies, significantly larger postural sway area under the most challenging condition (standing on a soft surface with eyes

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## CONCLUSIONS (CONTINUED)

closed), and slower completion of the Grooved Pegboard Test. These findings may not present with any symptoms or signs which are evident upon clinical examination. Lower performance on these tests has been associated with alcohol consumption, taking certain medications, other conditions like diabetes, and age, all of which we attempted to control for with our statistical analyses. Additionally, 22 employees had urinary TCAA levels above the ACGIH BEI of 100 mg/g creatinine.

Some battery separator production employees wore cotton or nitrile gloves when handling unfinished (i.e., “wet”) battery separator material and during product changes or line maintenance. While urinary TCAA levels in the exposed group were significantly correlated with PBZ TCE levels ( $r=0.48$ ,  $p<0.01$ ), skin absorption is also possible since neither cotton or nitrile gloves offer protection from TCE.

Entek International had a respirator program. However, at the time of this evaluation the extruders, winders, rovers, team leads, and supervisors in the battery separator protection areas were not required to wear respirators while performing their routine work tasks. The elastomeric half-mask, air-purifying respirators equipped with a combination organic vapor/N100 filter cartridge that were worn by battery separator production workers during product line changes and line maintenance activities were not sufficiently protective considering the higher shorter-term TCE exposures measured in this evaluation.

Noise levels exceeded the NIOSH REL in extrusion, winding, palletizing, maintenance, and utility/rover jobs (such as fork lift operators). Radios present in four of the six winder lines contributed to employee noise exposures. While noise exposures exceeded the NIOSH REL, most employees wore hearing protection while in the production areas.

The Entek International ventilation engineering plan reviewed during this evaluation included additional local exhaust and general dilution ventilation, and separating the extrusion, extraction, and winding areas with solid walls from floor to ceiling. The goals of this plan were to lower TCE concentrations throughout the battery separator production areas and to reduce the number of employees working in the areas with the highest mean TCE exposures.

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## RECOMMENDATIONS

1. Use engineering controls, such as local exhaust ventilation, general dilution ventilation, and enclosures to lessen or eliminate the need for routine respiratory protection from TCE exposures in the battery separator production areas.
2. Employees working as extruders, winders, rovers, team leads, and supervisors should wear elastomeric half-mask air-purifying respirators equipped with an organic vapor cartridge while performing routine work. Respirators should be worn until engineering or administrative controls are implemented to reduce TCE exposures below the NIOSH
3. Employees performing maintenance activities in the battery separator production areas should wear elastomeric full-face air purifying respirators equipped with an organic vapor cartridge because they may be exposed to TCE air concentrations above 250 ppm. This recommendation is based on results from shorter-term air sample results collected while employees were performing line maintenance in the battery separator production areas.
4. Employees should wear gloves made of polyvinyl alcohol, Teflon™, Viton™, or other suitable material when handling unfinished (i.e., “wet”) battery separator material that contains a higher percentage of TCE than in the final product to minimize the potential for dermal exposure.
5. Employees should use hearing protection while working in any production area. Several employees were observed without ear plugs or muffs during this study. In addition, employees should be instructed to keep the volume of their personal radios to a minimum.

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# APPENDIX A: TABLES

Table A1. TCE Exposures, by Job, Shift, and Work Day

| Start of Shift                                      | Job/Activity   | Line # | Shift | First half of shift |           | Second half of shift |           | Full shift TWA Conc (ppm) |
|---|----------------|--------|-------|---------------------|-----------|----------------------|-----------|---------------------------|
|   |                |        |       | Time                | TWA Conc  | Time                 | TWA Conc  |                           |
| Sunday<br>June 19,<br>2005                          | Winder         | 3      | 1     | 414                 | 65        | 280                  | 32        | 52                        |
|   | Winder         | 1      | 1     | 395                 | 84        | 299                  | 30.       | 61                        |
|   | Team Lead      |        | 1     | 376                 | 65        | 304                  | 21        | 45                        |
|   | Winder         | 2      | 1     | 392                 | 74        | 299                  | 71        | 73                        |
|   | Winder         | 4      | 1     | 385                 | 69        | 232                  | 56        | 64                        |
|   | Extruder       | 8      | 1     | 375                 | 66        | 325                  | 18        | 44                        |
|   | Rover          | 8      | 1     | 361                 | 78        | 305                  | 31        | 56                        |
|   | Winder         | 8      | 1     | 374                 | 69        | 317                  | 45        | 58                        |
|   | Extruder       | 7      | 1     | 393                 | 63        | 284                  | 39        | 53                        |
|   | Maintenance    |        | 1     | 406                 | 7.3       | 295                  | 3.5       | 5.8                       |
|   | Maintenance    |        | 1     | 394                 | 28        | 285                  | 24        | 26                        |
|   | Maintenance    |        | 1     | 394                 | 21        | 283                  | 11        | 17                        |
|   | Extruder       | 3      | 1     | 350                 | 53        | 266                  | 49        | 52                        |
|   | Extruder       | 1      | 1     | 376                 | 85        | 300                  | 54        | 71                        |
|   | Extruder       | 4      | 1     | 310                 | 69        | 301                  | 56        | 62                        |
|   | Pelletizer     |        | 1     | 295                 | 14        | 323                  | 7.7       | 11                        |
| <b>Average</b>                                      |                |        |       | <b>57</b>           |           | <b>34</b>            |           | <b>47</b>                 |
| <b>Max</b>  |                |        |       | <b>85</b>           |           | <b>71</b>            |           | <b>73</b>                 |
| <b>Min</b>  |                |        |       | <b>7.3</b>          |           | <b>3.5</b>           |           | <b>5.8</b>                |
| Sunday<br>June 19 to<br>Monday,<br>June 20,<br>2005 | Team Lead      |        | 2     | 377                 | 120       | 309                  | 36        | 82                        |
|   | Team Lead      |        | 2     | 379                 | 98        | 304                  | 41        | 73                        |
|   | Winder         | 3      | 2     | 387                 | 60.       | 284                  | 47        | 55                        |
|   | Winder         | 8      | 2     | 414                 | 83        | 259                  | 42        | 67                        |
|   | Winder         | 8      | 2     | 380                 | 110       | 287                  | 64        | 89                        |
|   | Extruder       | 8      | 2     | 365                 | 65        | 300                  | 34        | 51                        |
|   | Winder         | 2      | 2     | 388                 | 62        | 281                  | 40        | 52                        |
|   | Pelletizer     |        | 2     | 410                 | 13        | 266                  | 10        | 12                        |
|   | Utility        |        | 2     | 374                 | 27        | 291                  | 17        | 22                        |
|   | Rover          | 2      | 2     | 147                 | 69        | 295                  | 38        | 48                        |
|   | Extruder       | 7      | 2     | 364                 | 100       | 297                  | 39        | 73                        |
|   | Winder         | 1      | 2     | 378                 | 58        | 284                  | 46        | 53                        |
|   | Extruder       | 2      | 2     | 382                 | 66        | 276                  | 47        | 58                        |
|   | Extruder       | 1      | 2     | 377                 | 80        | 282                  | 53        | 69                        |
|   | Maintenance    |        | 2     | 391                 | 35        | 277                  | 2.3       | 22                        |
|   | Maintenance    |        | 2     | 390                 | 39        | 280                  | 3.3       | 24                        |
|   | Supervisor     |        | 2     | 356                 | 97        | 172                  | 100       | 98                        |
|   | Winder         | 8      | 2     | 356                 | 87        | 289                  | 54        | 72                        |
|   | Rover          | 8      | 2     | 369                 | 72        | 264                  | 40        | 58                        |
|   | <b>Average</b> |        |       |                     | <b>71</b> |                      | <b>40</b> |                           |
| <b>Max</b>  |                |        |       | <b>120</b>          |           | <b>100</b>           |           | <b>98</b>                 |
| <b>Min</b>  |                |        |       | <b>13</b>           |           | <b>2.3</b>           |           | <b>12</b>                 |

# APPENDIX A: TABLES (CONTINUED)

Table A1. TCE Exposures, by Job, Shift, and Work Day

| Start of Shift              | Job/Activity   | Line # | Shift | First half of shift |            | Second half of shift |             | Full shift TWA Conc (ppm) |
|-----------------------------|----------------|--------|-------|---------------------|------------|----------------------|-------------|---------------------------|
|                             |                |        |       | Time                | TWA Conc   | Time                 | TWA Conc    |                           |
| Monday,<br>June 20,<br>2005 | Winder         | 8      | 1     | 358                 | 58         | 327                  | 57          | 58                        |
|                             | Maintenance    |        | 1     | 391                 | 11         | 299                  | 3.1         | 7.3                       |
|                             | Extruder       | 8      | 1     | 348                 | 38         | 355                  | 27          | 32                        |
|                             | Extruder       | 8      | 1     | 398                 | 44         | 281                  | 36          | 41                        |
|                             | Team Lead      |        | 1     | 357                 | 44         | 329                  | 35          | 40.                       |
|                             | Winder         | 4      | 1     | 361                 | 48         | 325                  | 37          | 42                        |
|                             | Extruder       | 4      | 1     | 365                 | 48         | 243                  | 40.         | 45                        |
|                             | Winder         | 7      | 1     | 351                 | 33         | 323                  | 35          | 34                        |
|                             | Rover          | 8      | 1     | 343                 | 40         | 321                  | 56          | 48                        |
|                             | Utility        |        | 1     | 369                 | 13         | 323                  | 8.0         | 11                        |
|                             | Winder         | 3      | 1     | 357                 | 46         | 320                  | 35          | 41                        |
|                             | Cut-to-Size    |        | 1     | 370                 | 6.4        | 319                  | 3.0         | 4.8                       |
|                             | Winder         | 2      | 1     | 365                 | 40.        | 313                  | 33          | 37                        |
|                             | Extruder       | 1      | 1     | 364                 | 36         | 320                  | 37          | 37                        |
|                             | Extruder       | 2      | 1     | 356                 | 58         | 320                  | 48          | 53                        |
|                             | Pelletizer     |        | 1     | 337                 | 8.9        | 332                  | 0.20        | 4.6                       |
|                             | Extruder       | 3      | 1     | 347                 | 31         | 314                  | 32          | 32                        |
|                             | Maintenance    |        | 1     | 376                 | 4.4        | 285                  | 8.1         | 6.0                       |
|                             | Maintenance    |        | 1     | 378                 | 5.1        | 292                  | 12          | 8.0                       |
|                             | Supervisor     |        | 1     | 295                 | 37         | 351                  | 24          | 30                        |
|                             | <b>Average</b> |        |       |                     | <b>32</b>  |                      | <b>28</b>   | <b>30</b>                 |
|                             | <b>Max</b>     |        |       |                     | <b>58</b>  |                      | <b>56</b>   | <b>58</b>                 |
|                             | <b>Min</b>     |        |       |                     | <b>4.4</b> |                      | <b>0.02</b> | <b>4.6</b>                |



## APPENDIX A: TABLES (CONTINUED)

Table A1. TCE Exposures, by Job, Shift, and Work Day

| Start of Shift  | Job/Activity   | Line # | Shift | First half of shift |           | Second half of shift |           | Full shift TWA Conc (ppm) |
|---|----------------|--------|-------|---------------------|-----------|----------------------|-----------|---------------------------|
|   |                |        |       | Time                | TWA Conc  | Time                 | TWA Conc  |                           |
| Monday,<br>June 20 to<br>Tuesday,<br>June 21,<br>2005 | Team Lead      |        | 2     | 377                 | 30.       | 303                  | 17        | 24                        |
|   | Supervisor     |        | 2     | 370                 | 24        | 294                  | 5.7       | 16                        |
|   | Team Lead      |        | 2     | 373                 | 39        | 306                  | 18        | 30.                       |
|   | Winder         | 4      | 2     | 382                 | 29        | 301                  | 24        | 27                        |
|   | Extruder       | 8      | 2     | 389                 | 34        | 289                  | 19        | 28                        |
|   | Winder         | 8      | 2     | 384                 | 33        | 288                  | 26        | 30                        |
|   | Winder         | 8      | 2     | 379                 | 33        | 280                  | 20        | 27                        |
|   | Rover          | 8      | 2     | 368                 | 29        | 298                  | 23        | 26                        |
|   | Winder         | 8      | 2     | 378                 | 41        | 289                  | 22        | 33                        |
|   | Winder         | 2      | 2     | 361                 | 32        | 300                  | 24        | 28                        |
|   | Extruder       | 7      | 2     | 379                 | 36        | 275                  | 23        | 31                        |
|   | Winder         | 3      | 2     | 372                 | 33        | 298                  | 25        | 30.                       |
|   | Extruder       | 2      | 2     | 308                 | 28        | 257                  | 38        | 32                        |
|   | Pelletizer     |        | 2     | 379                 | 7.5       | 275                  | 3.8       | 5.9                       |
|   | Winder         | 1      | 2     | 356                 | 30        | 293                  | 24        | 28                        |
|   | Utility        |        | 2     | 381                 | 8.5       | 273                  | 8.2       | 8.4                       |
|   | Rover          | 2      | 2     | 399                 | 12        | 249                  | 11        | 12                        |
|   | Maintenance    |        | 2     | 378                 | 21        | 277                  | 7.3       | 15                        |
|   | Maintenance    |        | 2     | 384                 | 20.       | 271                  | 6.3       | 15                        |
|   | Extruder       | 1      | 2     | 280                 | 39        | 293                  | 40        | 39                        |
|   | <b>Average</b> |        |       |                     | <b>28</b> |                      | <b>19</b> |                           |
| <b>Max</b>  |                |        |       | <b>41</b>           |           | <b>40</b>            |           | <b>39</b>                 |
| <b>Min</b>  |                |        |       | <b>7.5</b>          |           | <b>3.8</b>           |           | <b>5.9</b>                |
| Tuesday,<br>June 21,<br>2005                          | Winder         | 8      | 1     | 394                 | 39        | 283                  | 37        | 38                        |
|   | Extruder       | 8      | 1     | 390                 | 41        | 279                  | 20        | 32                        |
|   | Extruder       | 8      | 1     | 380                 | 27        | 276                  | 24        | 26                        |
|   | Cut-to-Size    |        | 1     | 420                 | 2.8       | 278                  | 1.6       | 2.4                       |
|   | Winder         | 4      | 1     | 398                 | 28        | 291                  | 33        | 30.                       |
|   | Team Lead      |        | 1     | 404                 | 30.       | 274                  | 31        | 30.                       |
|   | Extruder       | 1      | 1     | 342                 | 31        | 284                  | 32        | 31                        |
|   | Extruder       | 4      | 1     | 400                 | 38        | 284                  | 34        | 37                        |
|   | Utility        |        | 1     | 392                 | 7.6       | 285                  | 10        | 8.7                       |
|   | Rover          | 4      | 1     | 378                 | 35        | 291                  | 32        | 34                        |
|   | Maintenance    |        | 1     | 406                 | 10.       | 272                  | 6.0       | 8.5                       |
|   | Winder         | 3      | 1     | 392                 | 28        | 285                  | 29        | 28                        |
|   | Extruder       | 7      | 1     | 371                 | 26        | 298                  | 29        | 27                        |
|   | Extruder       | 2      | 1     | 399                 | 34        | 283                  | 37        | 35                        |
|   | Pelletizer     |        | 1     | 370                 | 8.1       | 301                  | 8.8       | 8.4                       |
|   | Winder         | 2      | 1     | 385                 | 24        | 291                  | 24        | 24                        |
|   | Extruder       | 3      | 1     | 392                 | 35        | 286                  | 37        | 36                        |
|   | Maintenance    |        | 1     | 407                 | 27        | 263                  | 7.9       | 19                        |
|   | Supervisor     |        | 1     | 372                 | 19        | 305                  | 20        | 19                        |
|   | Maintenance    |        | 1     | 429                 | 19        | 239                  | 6.6       | 15                        |
|   | <b>Average</b> |        |       |                     | <b>25</b> |                      | <b>23</b> |                           |
| <b>Max</b>  |                |        |       | <b>41</b>           |           | <b>37</b>            |           | <b>38</b>                 |
| <b>Min</b>  |                |        |       | <b>2.8</b>          |           | <b>1.6</b>           |           | <b>2.4</b>                |

## APPENDIX A: TABLES (CONTINUED)

Table A1. TCE Exposures, by Job, Shift, and Work Day

| Start of Shift   | Job/Activity   | Line # | Shift | First half of shift |            | Second half of shift |            | Full shift TWA Conc (ppm) |
|--|----------------|--------|-------|---------------------|------------|----------------------|------------|---------------------------|
|  |                |        |       | Time                | TWA Conc   | Time                 | TWA Conc   |                           |
| Tuesday,<br>June 21 to<br>Wednesday,<br>June 22,<br>2005 | Rover          | 8      | 2     | 407                 | 16         | 273                  | 21         | 18                        |
|  | Extruder       | 8      | 2     | 393                 | 21         | 292                  | 20         | 21                        |
|  | Winder         | 8      | 2     | 385                 | 24         | 292                  | 24         | 24                        |
|  | Winder         | 8      | 2     | 380                 | 25         | 288                  | 21         | 23                        |
|  | Winder         | 3      | 2     | 373                 | 0.0        | 234                  | 34         | 13                        |
|  | Team Lead      |        | 2     | 413                 | 32         | 257                  | 15         | 25                        |
|  | Extruder       | 7      | 2     | 384                 | 26         | 293                  | 24         | 25                        |
|  | Extruder       | 2      | 2     | 400                 | 34         | 263                  | 41         | 37                        |
|  | Winder         | 7      | 2     | 378                 | 25         | 292                  | 24         | 25                        |
|  | Winder         | 4      | 2     | 363                 | 23         | 297                  | 40         | 31                        |
|  | Utility        |        | 2     | 369                 | 8.1        | 289                  | 9.6        | 8.7                       |
|  | Winder         | 1      | 2     | 383                 | 23         | 273                  | 29         | 26                        |
|  | Extruder       | 1      | 2     | 391                 | 34         | 270                  | 35         | 34                        |
|  | Pelletizer     |        | 2     | 375                 | 5.9        | 285                  | 6.8        | 6.3                       |
|  | Rewinder       |        | 2     | 363                 | 12         | 284                  | 14         | 13                        |
|  | Supervisor     |        | 2     | 379                 | 7.4        | 265                  | 17         | 11                        |
|  | Winder         | 2      | 2     | 375                 | 21         | 275                  | 20         | 21                        |
|  | Maintenance    |        | 2     | 406                 | 18         | 94                   | 1.9        | 15                        |
|  | Maintenance    |        | 2     | 317                 | 17         | 223                  | 4.5        | 12                        |
|  | Team Lead      |        | 2     | 389                 | 31         | 257                  | 19         | 26                        |
|  | <b>Average</b> |        |       |                     | <b>20</b>  |                      | <b>21</b>  | <b>21</b>                 |
|  | <b>Max</b>     |        |       |                     | <b>34</b>  |                      | <b>41</b>  | <b>37</b>                 |
|  | <b>Min</b>     |        |       |                     | <b>0.0</b> |                      | <b>1.9</b> | <b>6.3</b>                |

## APPENDIX A: TABLES (CONTINUED)

Table A1. TCE Exposures, by Job, Shift, and Work Day

| Start of Shift                 | Job/Activity   | Line # | Shift | First half of shift |           | Second half of shift |           | Full shift TWA Conc (ppm) |            |
|--------------------------------|----------------|--------|-------|---------------------|-----------|----------------------|-----------|---------------------------|------------|
|                                |                |        |       | Time                | TWA Conc  | Time                 | TWA Conc  |                           |            |
| Wednesday,<br>June 22,<br>2005 | Extruder       | 8      | 1 & 3 | 339                 | 13        | 321                  | 17        | 15                        |            |
|                                | Winder         | 8      | 1 & 3 | 184                 | 17        | 321                  | 24        | 22                        |            |
|                                | Maintenance    |        | 1 & 3 | 342                 | 2.6       | 330                  | 4.9       | 3.7                       |            |
|                                | Team Lead      |        | 1 & 3 | 320                 | 21        | 309                  | 16        | 18                        |            |
|                                | Rover          | 4      | 1 & 3 | 321                 | 15        | 321                  | 20        | 17                        |            |
|                                | Maintenance    |        | 1 & 3 | 312                 | 5.4       | 301                  | 5.6       | 5.5                       |            |
|                                | Extruder       | 4      | 1 & 3 | 319                 | 3.6       | 299                  | 35        | 19                        |            |
|                                | Extruder       | 1      | 1 & 3 | 315                 | 27        | 325                  | 38        | 33                        |            |
|                                | Winder         | 4      | 1 & 3 | 316                 | 20.       | 326                  | 24        | 22                        |            |
|                                | Extruder       | 3      | 1 & 3 | 316                 | 39        | 329                  | 34        | 36                        |            |
|                                | Utility        |        | 1 & 3 | 334                 | 4.0       | 326                  | 6.4       | 5.2                       |            |
|                                | Utility        |        | 1 & 3 |                     | No sample | 323                  | 16        | 16                        |            |
|                                | Extruder       | 7      | 1 & 3 | 327                 | 17        | 331                  | 26        | 22                        |            |
|                                | Winder         | 3      | 1 & 3 | 314                 | 23        | 126                  | 36        | 26                        |            |
|                                | Pelletizer     |        | 1 & 3 | 324                 | 4.0       |                      | No sample | 4.0                       |            |
|                                | Extruder       | 2      | 1 & 3 | 305                 | 28        | 321                  | 38        | 33                        |            |
|                                | Winder         | 2      | 1 & 3 | 305                 | 17        | 324                  | 22        | 20.                       |            |
|                                | Cut-to-size    |        | 1 & 3 | 369                 | 2.9       | 310                  | 0.8       | 2.0                       |            |
|                                | Supervisor     |        | 1 & 3 | 306                 | 29        | 341                  | 9.3       | 19                        |            |
|                                | Extruder       | 8      | 1 & 3 | 318                 | 19        |                      | No sample | 19                        |            |
|                                | Maintenance    |        | 1 & 3 | 297                 | 6.2       | 318                  | 5.7       | 5.9                       |            |
|                                | Maintenance    |        |       |                     | No sample | 317                  | 24        | 24                        |            |
|                                | Maintenance    |        |       |                     | No sample | 309                  | 29        | 29                        |            |
|                                | <b>Average</b> |        |       |                     |           | <b>16</b>            |           | <b>21</b>                 | <b>18</b>  |
|                                | <b>Max</b>     |        |       |                     |           | <b>39</b>            |           | <b>38</b>                 | <b>36</b>  |
|                                | <b>Min</b>     |        |       |                     |           | <b>2.6</b>           |           | <b>0.80</b>               | <b>2.0</b> |

# APPENDIX A: TABLES (CONTINUED)

Table A1. TCE Exposures, by Job, Shift, and Work Day

| Start of Shift  | Job/Activity   | Line # | Shift | First half of shift |           | Second half of shift |           | Full shift TWA Conc (ppm) |            |
|---|----------------|--------|-------|---------------------|-----------|----------------------|-----------|---------------------------|------------|
|   |                |        |       | Time                | TWA Conc  | Time                 | TWA Conc  |                           |            |
| Wednesday,<br>June 22 to<br>Thursday,<br>June 23,<br>2005 | Team Lead      |        | 2 & 4 | 347                 | 22        | 305                  | 32        | 26                        |            |
|   | Team Lead      |        | 2 & 4 | 419                 | 23        | 256                  | 39        | 29                        |            |
|   | Rover          | 8      | 2 & 4 | 333                 | 20.       |                      | No sample | 20.                       |            |
|   | Winder         | 8      | 2 & 4 | 330                 | 26        | 324                  | 30        | 28                        |            |
|   | Extruder       | 8      | 2 & 4 | 198                 | 16        | 328                  | 27        | 42                        |            |
|   | Winder         | 7      | 2 & 4 | 327                 | 25        |                      | No sample | 25                        |            |
|   | Extruder       | 7      | 2 & 4 | 330                 | 22        | 264                  | 35        | 28                        |            |
|   | Winder         | 8      | 2 & 4 | 409                 | 23        | 266                  | 29        | 25                        |            |
|   | Supervisor     |        | 2 & 4 | 262                 | 14        | 299                  | 24        | 19                        |            |
|   | Extruder       | 2      | 2 & 4 | 313                 | 1.7       |                      | No sample | 1.7                       |            |
|   | Winder         | 4      | 2 & 4 | 317                 | 22        | 267                  | 38        | 29                        |            |
|   | Extruder       | 1      | 2 & 4 | 458                 | 40.       |                      | No sample | 40.                       |            |
|   | Winder         | 2      | 2 & 4 | 409                 | 22        | 253                  | 25        | 23                        |            |
|   | Pelletizer     |        | 2 & 4 | 321                 | 9.2       |                      | No sample | 9.2                       |            |
|   | Maintenance    |        | 2 & 4 | 323                 | 5.2       | 301                  | 7.4       | 6.3                       |            |
|   | Maintenance    |        | 2 & 4 | 396                 | 9.4       | 298                  | 12        | 10.                       |            |
|   | Utility        |        | 2 & 4 | 317                 | 3.9       |                      | No sample | 3.9                       |            |
|   | Winder         | 1      | 2 & 4 | 291                 | 23        |                      | No sample | 23                        |            |
|   | Winder         | 3      | 2 & 4 | 270                 | 30.       | 264                  | 37        | 34                        |            |
|   | Winder         | 8      | 4     | 308                 | 30.       |                      | No sample | 30.                       |            |
|   | Winder         | 8      | 4     | 289                 | 30.       |                      | No sample | 30.                       |            |
|   | Winder         |        |       |                     | No sample | 18                   | 35        | 35                        |            |
|   | Winder         | 2      | 4     | 210                 | 34        | 17                   | 47        | 35                        |            |
|   | Extruder       | 3      | 4     | 286                 | 43        |                      | No sample | 43                        |            |
|   | Extruder       | 4      | 4     | 283                 | 40        |                      | No sample | 40                        |            |
|   | <b>Average</b> |        |       |                     |           | <b>22</b>            |           | <b>30</b>                 | <b>26</b>  |
|   | <b>Max</b>     |        |       |                     |           | <b>43</b>            |           | <b>39</b>                 | <b>43</b>  |
|   | <b>Min</b>     |        |       |                     |           | <b>1.7</b>           |           | <b>7.4</b>                | <b>1.7</b> |

## APPENDIX A: TABLES (CONTINUED)

Table A1. TCE Exposures, by Job, Shift, and Work Day

| Start of Shift                | Job/Activity | Line #         | Shift | First half of shift |           | Second half of shift |           | Full shift TWA Conc (ppm) |           |
|-------------------------------|--------------|----------------|-------|---------------------|-----------|----------------------|-----------|---------------------------|-----------|
|                               |              |                |       | Time                | TWA Conc  | Time                 | TWA Conc  |                           |           |
| Thursday,<br>June 23,<br>2005 | Extruder     | 8              | 3     | 380                 | 29        | 307                  | 27        | 28                        |           |
|                               | Supervisor   |                | 3     | 433                 | 22        | 279                  | 29        | 25                        |           |
|                               | Rover        | 8              | 3     | 380                 | 28        | 307                  | 23        | 26                        |           |
|                               | Winder       | 8              | 3     | 390                 | 31        | 298                  | 25        | 28                        |           |
|                               | Winder       | 7              | 3     | 406                 | 28        | 282                  | 30        | 29                        |           |
|                               | Winder       | 8              | 3     | 386                 | 31        | 302                  | 25        | 28                        |           |
|                               | Winder       | 4              | 3     | 387                 | 32        | 300                  | 31        | 32                        |           |
|                               | Team Lead    |                | 3     | 394                 | 34        | 276                  | 31        | 33                        |           |
|                               | Rover        | 7              | 3     | 428                 | 21        | 251                  | 18        | 20                        |           |
|                               | Cut-to-size  |                | 3     | 411                 | 3.5       | 286                  | 2.3       | 3.1                       |           |
|                               | Utility      |                | 3     | 415                 | 3.0       | 286                  | 7.3       | 4.7                       |           |
|                               | Winder       | 2              | 3     | 413                 | 28        | 277                  | 30.       | 29                        |           |
|                               | Winder       | 1              | 3     | 390                 | 28        | 301                  | 27        | 28                        |           |
|                               | Extruder     | 4              | 3     | 405                 | 28        | 288                  | 31        | 29                        |           |
|                               | Extruder     | 1              | 3     | 385                 | 41        | 299                  | 44        | 42                        |           |
|                               | Extruder     | 3              | 3     | 380                 | 34        | 297                  | 35        | 35                        |           |
|                               | Extruder     | 2              | 3     | 382                 | 38        | 299                  | 32        | 36                        |           |
|                               | Utility      |                | 3     | 388                 | 9.6       | 301                  | 7.6       | 8.7                       |           |
|                               | Maintenance  |                | 3     | 393                 | 17        | 285                  | 18        | 18                        |           |
|                               | Maintenance  |                | 3     | 382                 | 17        | 295                  | 11        | 14                        |           |
|                               | Winder       | 3              | 3     | 386                 | 37        | 286                  | 39        | 38                        |           |
|                               |              | <b>Average</b> |       |                     | <b>26</b> |                      | <b>25</b> |                           | <b>25</b> |
|                               |              | <b>Max</b>     |       |                     | <b>41</b> |                      | <b>39</b> |                           | <b>42</b> |
|                               | <b>Min</b>   |                |       | <b>22</b>           |           | <b>2.3</b>           |           | <b>4.7</b>                |           |

## APPENDIX A: TABLES (CONTINUED)

Table A1. TCE Exposures, by Job, Shift, and Work Day

| Start of Shift                                      | Job/Activity   | Line # | Shift | First half of shift |           | Second half of shift |           | Full shift TWA Conc (ppm) |
|---|----------------|--------|-------|---------------------|-----------|----------------------|-----------|---------------------------|
|   |                |        |       | Time                | TWA Conc  | Time                 | TWA Conc  |                           |
| Thursday,<br>June 23 to<br>Friday, June<br>24, 2005 | Rover          | 8      | 4     | 394                 | 16        | 297                  | 15        | 16                        |
|   | Team Lead      |        | 4     | 377                 | 29        | 289                  | 26        | 27                        |
|   | Team Lead      |        | 4     | 373                 | 27        | 301                  | 19        | 23                        |
|   | Winder         | 8      | 4     | 380                 | 28        | 303                  | 23        | 26                        |
|   | Winder         | 8      | 4     | 380                 | 23        | 295                  | 24        | 23                        |
|   | Winder         | 4      | 4     | 393                 | 35        | 282                  | 32        | 34                        |
|   | Extruder       | 8      | 4     | 384                 | 29        | 293                  | 24        | 27                        |
|   | Winder         | 2      | 4     | 359                 | 27        | 304                  | 23        | 25                        |
|   | Winder         | 8      | 4     | 374                 | 31        | 298                  | 20        | 26                        |
|   | Extruder       | 3      | 4     | 361                 | 39        | 302                  | 37        | 38                        |
|   | Winder         | 3      | 4     | 365                 | 52        | 300                  | 45        | 49                        |
|   | Pelletizer     |        | 4     | 379                 | 13        | 291                  | 6.4       | 10.                       |
|   | Extruder       | 1      | 4     | 353                 | 50        | 320                  | 35        | 43                        |
|   | Extruder       | 7      | 4     | 367                 | 27        | 294                  | 22        | 25                        |
|   | Extruder       | 4      | 4     | 347                 | 40.       | 316                  | 27        | 34                        |
|   | Utility        |        | 4     | 352                 | 17        | 307                  | 11        | 14                        |
|   | Maintenance    |        | 4     | 235                 | 24        | 274                  | 11        | 17                        |
|   | Supervisor     |        | 4     | 339                 | 22        | 305                  | 18        | 20                        |
|   | Winder         | 1      | 4     | 353                 | 28        | 291                  | 26        | 27                        |
|   | <b>Average</b> |        |       |                     | <b>29</b> |                      | <b>23</b> |                           |
| <b>Max</b>  |                |        |       | <b>52</b>           |           | <b>45</b>            |           | <b>49</b>                 |
| <b>Min</b>  |                |        |       | <b>16</b>           |           | <b>6.4</b>           |           | <b>10.</b>                |
| Friday,<br>June 24,<br>2005                         | Rover          | 8      | 3     | 382                 | 27        | 327                  | 45        | 35                        |
|   | Winder         | 8      | 3     | 363                 | 33        | 302                  | 27        | 30                        |
|   | Extruder       | 8      | 3     | 374                 | 30        | 308                  | 33        | 31                        |
|   | Winder         | 8      | 3     | 383                 | 32        | 383                  | 23        | 28                        |
|   | Winder         | 7      | 3     | 398                 | 23        | 292                  | 33        | 28                        |
|   | Winder         | 4      | 3     | 382                 | 28        | 308                  | 29        | 29                        |
|   | Team Lead      |        | 3     | 403                 | 28        | 283                  | 21        | 25                        |
|   | Extruder       | 4      | 3     | 376                 | 40        | 298                  | 31        | 36                        |
|   | Extruder       | 7      | 3     | 371                 | 30        | 310                  | 27        | 29                        |
|   | Extruder       | 3      | 3     | 372                 | 33        | 310                  | 33        | 33                        |
|   | Winder         | 2      | 3     | 385                 | 26        | 306                  | 24        | 25                        |
|   | Extruder       | 2      | 3     | 377                 | 44        | 307                  | 41        | 43                        |
|   | Winder         | 1      | 3     | 382                 | 2.8       | 309                  | 23        | 12                        |
|   | Utility        |        | 3     | 383                 | 9.0       | 311                  | 7.9       | 8.5                       |
|   | Utility        |        | 3     | 371                 | 21        | 318                  | 21        | 21                        |
|   | Extruder       | 1      | 3     | 374                 | 46        | 307                  | 230       | 130                       |
|   | Maintenance    |        | 3     | 376                 | 12        | 305                  | 9.4       | 11                        |
|   | Winder         | 3      | 3     | 366                 | 27        | 140                  | 51        | 33                        |
|   | Maintenance    |        | 3     | 354                 | 20        | 268                  | 15        | 18                        |
|   | Maintenance    |        | 3     | 346                 | 31        | 325                  | 13        | 22                        |
| Maintenance   |                | 3      | 369   | 27                  | 290       | 14                   | 22        |                           |
| <b>Average</b>                                      |                |        |       | <b>27</b>           |           | <b>36</b>            |           | <b>31</b>                 |
| <b>Max</b>  |                |        |       | <b>45</b>           |           | <b>230</b>           |           | <b>130</b>                |
| <b>Min</b>  |                |        |       | <b>2.8</b>          |           | <b>7.9</b>           |           | <b>8.5</b>                |

# APPENDIX A: TABLES (CONTINUED)

Table A1. TCE Exposures, by Job, Shift, and Work Day

| Start of Shift   | Job/Activity   | Line #         | Shift | First half of shift |           | Second half of shift |           | Full shift TWA Conc (ppm) |           |
|--|----------------|----------------|-------|---------------------|-----------|----------------------|-----------|---------------------------|-----------|
|  |                |                |       | Time                | TWA Conc  | Time                 | TWA Conc  |                           |           |
| Friday,<br>June 24 to<br>Saturday,<br>June 25,<br>2005 | Winder         | 8              | 4     | 251                 | 54        | 294                  | 33        | 42                        |           |
|  | Winder         | 8              | 4     | 382                 | 37        | 292                  | 37        | 37                        |           |
|  | Winder         | 4              | 4     | 375                 | 30        | 291                  | 37        | 33                        |           |
|  | Team Lead      |                | 4     | 386                 | 29        | 277                  | 35        | 32                        |           |
|  | Winder         | 2              | 4     | 395                 | 31        | 267                  | 42        | 36                        |           |
|  | Winder         | 3              | 4     | 370                 | 29        | 289                  | 34        | 31                        |           |
|  | Extruder       | 7              | 4     | 384                 | 32        | 285                  | 33        | 32                        |           |
|  | Team Lead      |                | 4     | 374                 | 38        | 294                  | 42        | 40                        |           |
|  | Extruder       | 1              | 4     | 364                 | 41        | 292                  | 42        | 42                        |           |
|  | Supervisor     |                | 4     | 359                 | 25        | 306                  | 29        | 27                        |           |
|  | Winder         | 7              | 4     | 386                 | 26        | 287                  | 31        | 28                        |           |
|  | Extruder       | 3              | 4     | 364                 | 28        | 293                  | 37        | 32                        |           |
|  | Extruder       | 4              | 4     | 367                 | 33        | 318                  | 29        | 31                        |           |
|  | Extruder       | 8              | 4     | 406                 | 28        | 275                  | 34        | 30                        |           |
|  | Pelletizer     |                | 4     | 382                 | 26        | 284                  | 34        | 30                        |           |
|  | Utility        |                | 4     | 356                 | 6.0       | 292                  | 6.9       | 6.4                       |           |
|  | Maintenance    |                | 4     | 348                 | 5.6       | 298                  | 14        | 9.4                       |           |
|  |                | <b>Average</b> |       |                     | <b>29</b> |                      | <b>32</b> |                           | <b>30</b> |
|  |                | <b>Max</b>     |       |                     | <b>54</b> |                      | <b>42</b> |                           | <b>42</b> |
|  | <b>Min</b>     |                |       | <b>5.6</b>          |           | <b>6.9</b>           |           | <b>6.4</b>                |           |
| Saturday,<br>June 26,<br>2005                          | Utility        |                |       |                     | No sample | 310                  | 7.2       | 7.2                       |           |
|  | Utility        |                | 3     | 390                 | 3.2       | 285                  | 45        | 21                        |           |
|  | Extruder       | 8              | 3     | 399                 | 56        | 315                  | 28        | 44                        |           |
|  | Winder         | 7              | 3     | 368                 | 32        | 290                  | 51        | 41                        |           |
|  | Rover          | 8              | 3     | 392                 | 73        | 331                  | 32        | 54                        |           |
|  | Maintenance    |                | 3     | 343                 | 41        | 337                  | 26        | 34                        |           |
|  | Team Lead      |                | 3     | 364                 | 29        | 286                  | 34        | 31                        |           |
|  | Winder         | 8              | 3     | 399                 | 62        | 318                  | 29        | 47                        |           |
|  | Winder         | 4              | 3     | 367                 | 24        | 310                  | 23        | 24                        |           |
|  | Winder         | 2              | 3     | 378                 | 22        | 318                  | 34        | 27                        |           |
|  | Pelletizer     |                | 3     | 360                 | 34        | 315                  | 3.6       | 20                        |           |
|  | Extruder       | 3              | 3     | 365                 | 29        | 318                  | 36        | 32                        |           |
|  | Winder         | 3              | 3     | 360                 | 29        | 313                  | 20        | 25                        |           |
|  | Winder         | 1              | 3     | 370                 | 21        | 314                  | 40        | 30                        |           |
|  | Extruder       | 1              | 3     | 366                 | 35        | 310                  | 28        | 32                        |           |
|  | Extruder       | 4              | 3     | 362                 | 28        | 312                  | 43        | 35                        |           |
|  | Extruder       | 2              | 3     | 366                 | 34        | 318                  | 27        | 31                        |           |
|  | Utility        |                | 3     | 369                 | 12        | 284                  | 22        | 17                        |           |
|  | Maintenance    |                | 3     | 372                 | 52        |                      | No sample | 52                        |           |
|  | <b>Average</b> |                |       | <b>34</b>           |           | <b>29</b>            |           | <b>32</b>                 |           |
|  | <b>Max</b>     |                |       | <b>73</b>           |           | <b>51</b>            |           | <b>54</b>                 |           |
|  | <b>Min</b>     |                |       | <b>3.2</b>          |           | <b>3.6</b>           |           | <b>7.2</b>                |           |



## APPENDIX A: TABLES (CONTINUED)

Table A1. TCE Exposures, by Job, Shift, and Work Day

| Start of Shift                | Job/Activity   | Line # | Shift | First half of shift |            | Second half of shift |           | Full shift TWA Conc (ppm) |           |
|-------------------------------|----------------|--------|-------|---------------------|------------|----------------------|-----------|---------------------------|-----------|
|                               |                |        |       | Time                | TWA Conc   | Time                 | TWA Conc  |                           |           |
| Saturday,<br>June 26,<br>2005 | Winder         | 2      | 4     | 362                 | 20         |                      | No sample | 20                        |           |
|                               | Winder         | 3      | 4     | 361                 | 22         |                      | No sample | 22                        |           |
|                               | Winder         | 8      | 4     | 378                 | 22         |                      | No sample | 22                        |           |
|                               | Extruder       | 7      | 4     | 375                 | 24         |                      | No sample | 24                        |           |
|                               | Team Lead      |        | 4     | 369                 | 41         |                      | No sample | 41                        |           |
|                               | Winder         | 4      | 4     | 368                 | 24         |                      | No sample | 24                        |           |
|                               | Extruder       | 3      | 4     | 359                 | 27         |                      | No sample | 27                        |           |
|                               | Winder         | 8      | 4     | 376                 | 23         |                      | No sample | 23                        |           |
|                               | Extruder       | 4      | 4     | 358                 | 23         |                      | No sample | 23                        |           |
|                               | Team Lead      |        | 4     | 374                 | 28         |                      | No sample | 28                        |           |
|                               | Pelletizer     |        | 4     | 350                 | 8.8        |                      | No sample | 8.9                       |           |
|                               | Extruder       | 8      | 4     | 366                 | 32         |                      | No sample | 32                        |           |
|                               | Maintenance    |        | 4     | 352                 | 6.7        |                      | No sample | 6.7                       |           |
|                               | Winder         | 7      | 4     | 380                 | 23         |                      | No sample | 23                        |           |
|                               | Supervisor     |        | 4     | 368                 | 23         |                      | No sample | 23                        |           |
|                               | <b>Average</b> |        |       |                     |            | <b>23</b>            |           |                           | <b>23</b> |
|                               | <b>Max</b>     |        |       |                     |            | <b>41</b>            |           |                           | <b>41</b> |
| <b>Min</b>                    |                |        |       |                     | <b>8.9</b> |                      |           | <b>8.9</b>                |           |

## APPENDIX A: TABLES (CONTINUED)

Table A2. Personal Noise Dosimeter Results

| Date                             | Shift | Job                    | Sample Time (Hr:Min) | Dose %†  |           | TWA in dBA‡ |           |
|----------------------------------|-------|------------------------|----------------------|----------|-----------|-------------|-----------|
|                                  |       |                        |                      | OSHA PEL | NIOSH REL | OSHA PEL    | NIOSH REL |
| 6/19/05                          | 1     | Extruder Line 1        | 11:08                | 11.8*    | 191.6     | 74.6        | 87.8      |
| 6/20/05                          | 1     | Winder, Line 8         | 9:36                 | 8.7      | 116.7     | 72.4        | 85.7      |
| 6/20/05                          | 1     | Winder, Line 3         | 9:32                 | 5.7      | 67.8      | 69.4        | 56.8      |
| 6/20/05                          | 1     | Winder, Line 2         | 9:48                 | 14.3     | 138       | 74.5        | 86.4      |
| 6/22/05                          | 1     | Cut-to-Size            | 9:09                 | 2.8      | 93.5      | 64.2        | 84.7      |
| 6/21/05                          | 1     | Extruder, Line 8       | 10:13                | 5.6*     | 139       | 69.2        | 86.4      |
| 6/21/05                          | 1     | Pelletizer             | 9:53                 | 142.3*   | 1166      | 92.5        | 95.7      |
| 6/21/05                          | 1     | Extruder, Line 7       | 9:46                 | 76.7*    | 8115      | 88.1        | 104.1     |
| 6/22/05                          | 1     | Supervisor             | 2:49                 | 3.5      | 36.7      | 65.8        | 80.6      |
| 6/19/05                          | 2     | Forklift Operator      | 11:25                | 7.9      | 106.4     | 71.7        | 85.3      |
| 6/19/05                          | 2     | Extruder, Line 4       | 11:03                | 26.3*    | 265.3     | 80.4        | 89.2      |
| 6/19/05                          | 2     | Regrind/Winder, Line 4 | 10:44                | 5.4      | 97.8      | 68.9        | 84.9      |
| 6/20/05                          | 2     | Extruder, Line 7       | 10:51                | 22.3*    | 204       | 79.2        | 88.1      |
| 6/20/05                          | 2     | Team Lead              | 10:17                | 14.2     | 117.7     | 75.9        | 85.7      |
| 6/20/05                          | 2     | Maintenance            | 10:05                | 13.3     | 154.8     | 75.5        | 86.9      |
| 6/20/05                          | 2     | Winder, Line 8         | 11:08                | 9.1      | 364.3     | 72.7        | 90.6      |
| 6/20/05                          | 2     | Pelletizer             | 10:04                | 105.7*   | 559.7     | 90.4        | 92.5      |
| 6/21/05                          | 2     | Rewinder               | 10:46                | 7.8      | 103.7     | 71.6        | 85.2      |
| 6/21/05                          | 2     | Supervisor             | 10:44                | 9.7      | 102.9     | 73.2        | 85.1      |
| 6/21/05                          | 2     | Extruder, Line 2       | 11:02                | 18.9*    | 229.5     | 78          | 88.6      |
| 6/22/05                          | 2     | Maintenance            | 2:57                 | 19.1     | 141.3     | 78          | 86.5      |
| 6/22/05                          | 2     | Extruder, Line 1       | 11:02                | 21.8*    | 239.5     | 79          | 88.8      |
| 6/21/05                          | 3     | Winder, Line 8         | 11:12                | 30.7*    | 276       | 81.5        | 89.4      |
| 6/22/05                          | 3     | Extruder, Line 8       | 3:05                 | 3.4      | 40.4      | 65.7        | 81.1      |
| 6/22/05                          | 3     | Rover                  | 3:10                 | 26.9     | 259.4     | 80.5        | 89.1      |
| 6/22/05                          | 4     | Maintenance            | 4:56                 | 10.5     | 102.1     | 73.8        | 85.1      |
| 6/22/05                          | 4     | Winder, Line 1         | 4:43                 | 1.7      | 28.4      | 60.6        | 79.5      |
| 6/22/05                          | 4     | Winder, Line 8         | 5:33                 | 17.5     | 193.4     | 77.4        | 87.9      |
| 6/22/05                          | 4     | Winder, Line 8         | 5:07                 | 21       | 246.1     | 76.5        | 88.9      |
| 6/22/05                          | 4     | Team Lead              | 5:04                 | 19.3     | 191.8     | 78.1        | 87.8      |
| 6/23/05                          | 4     | Winder, Line 4         | 11:11                | 3.0      | 84.4      | 64.7        | 84.3      |
| 6/23/05                          | 4     | Winder, Line 2         | 11:01                | 11.6*    | 202.8     | 71.3        | 88.1      |
| 6/23/05                          | 4     | Extruder, Line 3       | 11:02                | 107.2*   | 736.2     | 90.5        | 93.7      |
| 6/24/05                          | 4     | Team Lead              | 11:14                | 23.7*    | 215.5     | 79.6        | 88.3      |
| 6/24/05                          | 4     | Pelletizer             | 11:06                | 154.4*   | 754.7     | 93.1        | 93.8      |
| OSHA Permissible Exposure Limit  |       |                        |                      | 100      |           | 90          |           |
| NIOSH Recommended Exposure Limit |       |                        |                      |          |           | 100 ■       |           |

† The dose percentages are the amount of noise accumulated during a work day, with 100% representing the maximum allowable daily dose.

‡ Time weighted average of noise exposure levels during a sampling period, measured in A-weighted decibels.

\* Exceeds the OSHA Action Level for noise.

■ Twelve-hour exposures have to be 83 dBA or less according to the NIOSH REL.

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## APPENDIX B: METHODS

### Trichloroethylene

Full-shift PBZ air samples for TCE were collected on the following jobs: extruders, winders, maintenance, rovers, utility, team leads, supervisors, pelletizer, and cut-to-fit. Shorter-term samples were collected to evaluate specific non-routine work tasks in the battery separator production area (such as a line break repair or during a product change). To verify that there was no TCE exposure to the non-exposed participants working in nearby offices and at Entek Manufacturing, GA air samples were collected at these locations throughout the week. Short-term PBZ air samples were collected to evaluate specific non-routine work tasks (such as a line break repair or during a product change over).

All full-shift PBZ and GA air samples for TCE were collected on activated charcoal tubes at a flow rate of 50 cc/min. Short-term air samples were collected at a flow rate of 100 cc/min. All sampling equipment was calibrated prior to use. The charcoal tubes samples were analyzed by gas chromatography according to NIOSH NMAM Method 1022 [NIOSH 2006].

Fresh urine samples were collected in sterile polypropylene specimen containers over a period of 6 days. One sample was collected from each study participant at the end of their workweek. At the time of collection, 1 mL of urine was transferred into empty 2 mL round bottom cryovials with a sterile transfer pipette. The aliquots, to be used for creatinine analysis, were then frozen, field-stored, and then shipped on dry ice. At the NIOSH laboratory, the samples were initially stored in a -70°C freezer while awaiting transfer to the Reproductive Endocrinology Laboratory where they were stored in a -80°C freezer.

The urine samples were analyzed for TCAA by a method developed by DataChem Laboratories, a NIOSH contract laboratory. The frozen urine samples were allowed to thaw. A 200 mL aliquot was removed, mixed with boron trifluoride/methanol (14%), and heated to 60°C for 2.5 hours. After cooling, 2 mL of toluene was added to each sample. The samples were then vortexed for 1 minute to separate the toluene layer, and the extract was dried by passing through a bed of anhydrous sodium sulfate. This extract was analyzed for TCAA using a Hewlett-Packard Model 5890 gas chromatograph equipped with an electrol capture detector and a 7673A autosampler.

For the urinary creatinine assay, samples were diluted 1:30 using a TECAN Robotic Sample Processor; duplicate dilutions were pipetted by the robot and each dilution analyzed in singlet using a Vitros 250 Chemistry Analyzer (Ortho-Clinical Diagnostics). Creatine, derived via a slow reaction from creatinine, is converted to sarcosine, which is then oxidized to yield peroxide, which in turn oxidizes leuco dye to yield a colored product. The change in reflectance measured between readings at 3.85 minutes and 5 minutes is proportional to the creatinine level in the sample, and readings are made at 37°C using 670 nanometer wavelength. Creatinine measurements were calibrated with a 3-level standard curve, with the highest value of 13 milligrams per deciliter corresponding to a concentration of 495 milligrams per deciliter for samples diluted 30-fold.

### Noise

Quest® Electronics Model Q-300 Noise Dosimeters were worn by workers in the following job titles: extruders, winders, maintenance, rovers, utility, pelletizer, and cut-to-fit. The noise dosimeters were clipped to the employee's belt. A small microphone connected to the end of a cable attached to the noise dosimeter was fastened to the employee's shoulder halfway between the collar and the end of

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## APPENDIX B: METHODS (CONTINUED)

the employee's shoulder. A windscreen provided by the manufacturer was placed over the microphone during recordings. At the end of the employee's work shift the dosimeter was removed and paused to stop data collection. The information stored in the dosimeters was downloaded to a personal computer for interpretation with QuestSuite for Windows® software. All noise dosimeters were calibrated before and after use with a Quest CA-12B model calibrator according to the manufacturer's instructions.

Real time, instantaneous noise monitoring was done throughout Entek International production areas on June 24, 2005, with a Quest Electronics Model 2400 Type II SLM. The instrument was set to measure noise levels between 70 and 140 decibels, dBA. The SLM was calibrated before and after the measurement periods with a Quest CA-12B calibrator. Noise level readings were obtained three feet from each noise source.



Photo 2: Postural Sway Test

### Neurobehavioral Testing

#### *Postural Sway*

Testing was performed on a microcomputer-controlled force platform using protocols established by NIOSH investigators [Dick 1995]. Four test conditions, each lasting 30 seconds, were used (e.g., eyes open and eyes closed on the hard platform and a foam pad). Each test condition was preceded by one practice trial. Prior to the sway testing, participants were instructed to remove their shoes and stand still on the platform, with arms at their sides focusing on a cross on a wall for the two conditions. Testing was repeated on the platform,

with arms at their sides focusing on a cross on a wall for the two conditions. Testing was repeated with eyes closed, and standing on 4-inch thick foam pads, both with eyes open and eyes closed. Measures of sway area and sway length were used for analysis. Sway area represents the area within the sway path in square centimeters, and sway length is the length of the sway vector path in centimeters.



Photo 3: Visual Contrast Sensitivity Test Using FACT™ Chart

#### *Visual Contrast Sensitivity*

Contrast sensitivity testing was conducted using the FACT™ hand-held chart [Ginsburg 1993]. This instrument consists of a calibrated rod with a card holder at one end and cheek pads at the other end that is held tightly against the face to maintain a constant viewing distance between the eyes and the test card. The FACT™ sine-wave grating chart tests five spatial frequencies (A, B, C, D, and E) and nine levels of contrast. The last grating seen for each spatial frequency row, assessed by a correct reporting of the orientation of the grating (right, up, or left), is plotted on a contrast sensitivity curve. Test results produce a visuo-gram that

indicates sensitivity at each of the five spatial frequencies (e.g., 1.5, 3, 6, 12, 18 cycles per degree) tested. The preprinted recording form indicates the normal range of average performance for 90% of the normal population [Ginsburg 1993]; separate norms for gender or age are not available. Because high levels of visual sensitivity for spatial form are associated with low contrast thresholds, a reciprocal measure (1/

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## APPENDIX B: METHODS (CONTINUED)

threshold), termed the contrast sensitivity score, is computed. Measures of visual contrast sensitivity, rather than measures of refractory visual acuity, have been presented as better appraisals of visual dysfunction resulting from chemical exposures. However, if visual acuity is poor, then performance on the FACT™ will also be poor. Therefore we also measured visual acuity using a handheld Snellen chart. Results from persons with visual acuity of 20/40 or worse were removed from further analysis.



Photo 4: Grooved Pegboard Test

### **Grooved Pegboard Test**

The Grooved Pegboard Test was used to assess fine psychomotor control as well as to evaluate visual, tactile, and kinesthetic motor systems. The test consists of a small board containing a 5 by 5 set of slotted holes angled in different directions. Subjects are seated in front of the pegboard and instructed to insert 25 pegs into the 25 holes as fast as they can, starting with their dominant hand. The time in seconds to complete the 25 insertions is recorded. After a short rest break, the non-dominant hand is tested. By examining both hands inferences may be drawn regarding possible lateral brain damage.

### **Trail Making A and B**

The test consists of two parts, form A and form B. Form A consists of 8 consecutively numbered circles on one side of a sheet and 25 consecutively numbered circles on the other side. Form B consists of eight circles, four consecutively numbered and four consecutively lettered on one side of the sheet and 25 circles, 13 consecutively numbered (1-13) and 12 consecutively lettered (A-L) on the other side of the sheet. The subject is instructed to use a pencil to connect consecutively numbered circles on form A “as fast as you can without lifting the pencil from the paper,” starting with the practice trial first. At the completion of the practice trial for form A, the sheet is turned over and the test begins. The test is timed, but the experimenter will interrupt to point out errors so the test is completed error free. Following completion of form A, form B is administered. In form B, subjects alternately connect (1-A-2-B-3-C and so on) numbered circles and lettered circles starting with the practice trial first. The test takes about 3 minutes and the number of correct circles and/or numbers connected within the time limit is totaled for each form (e.g., A and B). Adult age norms for forms A and B are available for comparison.

### **Symbol Color Recode Test**

As shown in Photo 5, the Symbol Color Recode Test presented one symbol at a time, using a Pentium® II-based Dell Latitude™ laptop personal computer, running Windows® 2000 Professional software. The Symbol Color Recode Test task involved pressing a matching colored button on a response pad, based on the pairings shown in the symbol color matrix, as quickly and accurately as possible using just the index finger of the preferred hand. The programming for the Symbol Color Recode Test was achieved by using SuperLab Pro version 2.0 Experimental Lab Software from the Cedrus® Corporation. Response input was coded from a six-key, color-coded, response panel available with the SuperLab Pro software. The arrangement of the colored response buttons on the panel mirrored that of the symbol color matrix. Test instructions were presented via the computer and were also paraphrased by the test administrators. Participants were queried to assure they understood the instructions, that they could distinguish the

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## APPENDIX B: METHODS (CONTINUED)

colors of the test, and that they were wearing corrective lenses if needed. Participants were given a short practice session with auditory feedback provided for incorrect responses. During the short practice, as well as the most of the 5-minute test session, the symbol-color matrix was always present above the symbol. However, another unique aspect of Symbol Color Recode Test task is that it tests the implicit learning that accompanies performance in tasks of this sort. This was achieved through a manipulation that instructed



Photo 5: Symbol Color Test

participants that the computer may determine, at some point during the test, that they have a sufficiently high level of performance and therefore remove the symbol color matrix from the screen. In actuality, the matrix was removed for every participant at the same point in the test, with the last 30 symbols being presented without the previously accompanying matrix.

The Digit Symbol Test and the Symbol Digit Modalities Test present only a single number (digit symbol) or symbol (symbol digit), below the matrix and the participant must add the missing member of each pair, as quickly as possible with performance measured by the number of items correctly coded in a given time period (typically 90 seconds). In the Digit Symbol Test, motor performance is more challenging in that people have more practice writing numbers than symbols. While the motor component of the Digit Symbol Test would appear to make this a very different test than when the person writes numbers, the two tests correlate well. The Symbol Color Recode Test reduces the motor component of these tests, as well as any individual difference in digit writing proficiency, by pairing colors with symbols. Also, the Digit Symbol Test from the Wechsler Adult Intelligence Scale is typically administered as a paper-and-pencil test, while the Symbol Color Recode Test is completely computerized.

It was hypothesized that the frequently subtle effects of low-level chemical exposures on the nervous system may not have been evident in larger, more-overt test performance measures, but rather may be revealed in tests of higher cognitive functions such as implicit learning. It is important to note that the Symbol Color Recode Test has not, to date, been empirically validated.

## References, Appendix B

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## APPENDIX C: OCCUPATIONAL EXPOSURE LIMITS & HEALTH EFFECTS

In evaluating the hazards posed by workplace exposures, NIOSH investigators use both mandatory (legally enforceable) and recommended OELs for chemical, physical, and biological agents as a guide for making recommendations. OELs have been developed by Federal agencies and safety and health organizations to prevent the occurrence of adverse health effects from workplace exposures. Generally, OELs suggest levels of exposure to which most workers may be exposed up to 10 hours per day, 40 hours per week for a working lifetime without experiencing adverse health effects. However, not all workers will be protected from adverse health effects even if their exposures are maintained below these levels. A small percentage may experience adverse health effects because of individual susceptibility, a pre-existing medical condition, and/or a hypersensitivity (allergy). In addition, some hazardous substances may act in combination with other workplace exposures, the general environment, or with medications or personal habits of the worker to produce health effects even if the occupational exposures are controlled at the level set by the exposure limit. Also, some substances can be absorbed by direct contact with the skin and mucous membranes in addition to being inhaled, which contributes to the individual's overall exposure.

Most OELs are expressed as a TWA exposure. A TWA refers to the average exposure during a normal 8- to 10-hour workday. Some chemical substances and physical agents have recommended STEL or ceiling values where health effects are caused by exposures over a short-period. Unless otherwise noted, the STEL is a 15-minute TWA exposure that should not be exceeded at any time during a workday, and the ceiling limit is an exposure that should not be exceeded at any time.

In the U.S., OELs have been established by Federal agencies, professional organizations, state and local governments, and other entities. Some OELs are legally enforceable limits, while others are recommendations. The U.S. Department of Labor OSHA PELs (29 CFR\* 1910 [general industry]; 29 CFR 1926 [construction industry]; and 29 CFR 1917 [maritime industry]) are legal limits enforceable in workplaces covered under the Occupational Safety and Health Act. NIOSH RELs are recommendations based on a critical review of the scientific and technical information available on a given hazard and the adequacy of methods to identify and control the hazard. NIOSH RELs can be found in the *NIOSH Pocket Guide to Chemical Hazards* [NIOSH 2005]. NIOSH also recommends different types of risk management practices (e.g., engineering controls, safe work practices, worker education/training, personal protective equipment, and exposure and medical monitoring) to minimize the risk of exposure and adverse health effects from these hazards. Other OELs that are commonly used and cited in the U.S. include the TLVs recommended by ACGIH, a professional organization, and the WEELs recommended by the American Industrial Hygiene Association, another professional organization. ACGIH TLVs are considered voluntary exposure guidelines for use by industrial hygienists and others trained in this discipline “to assist in the control of health hazards” [ACGIH 2007]. WEELs have been established for some chemicals “when no other legal or authoritative limits exist” [AIHA 2007].

Employers should understand that not all hazardous chemicals have specific OSHA PELs, and for some agents the legally enforceable and recommended limits may not reflect current health-based information. However, an employer is still required by OSHA to protect its employees from hazards even in the absence of a specific OSHA PEL. OSHA requires an employer to furnish employees a place of employment free from recognized hazards that cause or are likely to cause death or serious physical harm [Occupational

\* Code of Federal Regulations. See CFR in references.

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## APPENDIX C: OCCUPATIONAL EXPOSURE LIMITS & HEALTH EFFECTS (CONTINUED)

Safety and Health Act of 1970 (Public Law 91-596, sec. 5(a)(1)). Thus, NIOSH investigators encourage employers to make use of other OELs when making risk assessment and risk management decisions to best protect the health of their employees. NIOSH investigators also encourage the use of the traditional hierarchy of controls approach to eliminate or minimize identified workplace hazards. This includes, in order of preference, the use of: (1) substitution or elimination of the hazardous agent, (2) engineering controls (e.g., local exhaust ventilation, process enclosure, dilution ventilation), (3) administrative controls (e.g., limiting time of exposure, employee training, work practice changes, medical surveillance), and (4) personal protective equipment (e.g., respiratory protection, gloves, eye protection, hearing protection). Safety and Health Act of 1970, Public Law 91-596, sec. 5(a)(1)]. Thus, NIOSH investigators encourage employers to make use of other OELs when making risk assessment and risk management decisions to best protect the health of their employees. NIOSH investigators also encourage the use of the traditional hierarchy of controls approach to eliminate or minimize identified workplace hazards. This includes, in order of preference, the use of: (1) substitution or elimination of the hazardous agent, (2) engineering controls (e.g., local exhaust ventilation, process enclosure, dilution ventilation), (3) administrative controls (e.g., limiting time of exposure, employee training, work practice changes, medical surveillance), and (4) personal protective equipment (e.g., respiratory protection, gloves, eye protection, hearing protection).

### Trichloroethylene

TCE is a nonflammable, colorless liquid with a somewhat sweet odor and a sweet, burning taste. Short-term exposure to trichloroethylene causes irritation of the nose and throat and central nervous system depression, with symptoms such as drowsiness, dizziness, giddiness, headache, loss of coordination. High concentrations have caused numbness and facial pain, reduced eyesight, unconsciousness, irregular heartbeat, and death [NIOSH 1992].

The NIOSH REL for airborne TCE is 25 ppm for up to a 10-hour TWA exposure. However, since Entek International employees worked extended 12-hour shifts during this evaluation, the NIOSH REL was reduced by 25% to 21 ppm TWA. The OSHA PEL is 100 ppm, TWA for up to an 8-hour work shift, and no adjustment is made for extended work shifts [CFR]. The current ACGIH TLV for TCE (revised in 2007) is 10 ppm TWA for up to an 8-hour work shift [ACGIH 2007].

NIOSH does not have a recommended BEI for evaluating TCE exposures. However, measuring TCAA (a metabolite of TCE) in urine is one of several recommended biological determinants for evaluating TCE exposure, and is the best indicator of integrated exposure over the workweek [ACGIH 2005]. The current recommended ACGIH BEI for TCAA is 100 mg/g creatinine, and this value was intended to provide the same protection as the former TLV-TWA of 50 ppm. While the ACGIH TLV does not include a skin designation because significant systemic health effects resulting from skin exposure has not been demonstrated, dermal contact with liquid TCE can contribute to measured biological exposure [ACGIH 2005].



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## APPENDIX C: OCCUPATIONAL EXPOSURE LIMITS & HEALTH EFFECTS (CONTINUED)

In 1995, the IARC classified TCE as a probable human carcinogen [Raaschou-Nielson et al. 2002]. Probable human carcinogenicity means that based on human carcinogenicity data there is limited evidence in humans for the carcinogenicity of TCE [IARC 1995]. To date, the data for the carcinogenicity of TCE in humans has been inconsistent and controversial [Raaschou-Nielson et al. 2002].

### Noise

Noise-induced loss of hearing is an irreversible, sensorineural condition that progresses with exposure. Although hearing ability declines with age (presbycusis) in all populations, exposure to noise produces hearing loss greater than that resulting from the natural aging process. This noise-induced loss is caused by damage to nerve cells of the inner ear (cochlea) and, unlike some conductive hearing disorders, cannot be treated medically. While loss of hearing may result from a single exposure to a very brief impulse noise or explosion, such traumatic losses are rare. In most cases, noise-induced hearing loss is insidious. Typically, it begins to develop at 4000 or 6000 Hz (the hearing range is 20 Hz to 20000 Hz) and spreads to lower and higher frequencies. Often, material impairment has occurred before the condition is clearly recognized. Such impairment is usually severe enough to permanently affect a person's ability to hear and understand speech under everyday conditions.

The dBA is the preferred unit for measuring sound levels to assess worker noise exposures and is weighted to approximate the sensory response of the human ear to sound frequencies near the threshold of hearing.

The decibel unit is dimensionless, and represents the logarithmic relationship of the measured sound pressure level to an arbitrary reference sound pressure (20 micropascals, the normal threshold of human hearing at a frequency of 1000 Hz). Decibel units are used because of the very large range of sound pressure levels which are audible to the human ear. Because the dBA scale is logarithmic, increases of 3 dBA, 10 dBA, and 20 dBA represent a doubling, tenfold increase, and hundredfold increase of sound energy, respectively. It should be noted that noise exposures expressed in decibels cannot be averaged by taking the simple arithmetic mean.

The OSHA PEL for noise (29 CFR 1910.95) specifies a maximum of 90 dBA for 8 hours per day and uses a 5 dB time/intensity trading relationship, or exchange rate. This means that a person may be exposed to noise levels of 95 dBA for no more than 4 hours, to 100 dBA for 2 hours, etc. Conversely, up to 16 hours exposure to 85 dBA is allowed by this exchange rate. The duration and sound level intensities can be combined in order to calculate a worker's daily noise dose according to the formula,  $Dose = 100 \times (C_1/T_1 + C_2/T_2 + \dots + C_n/T_n)$ , where  $C_n$  indicates the total time of exposure at a specific noise level and  $T_n$  indicates the reference duration for that level as given in Table G-16a of the OSHA noise regulation. During any 24-hour period, a worker is allowed up to 100% of his daily noise dose.

The OSHA regulation has an additional AL of 85 dBA; an employer shall administer a continuing, effective hearing conservation program when the 8-hour TWA value exceeds the AL. The program must include monitoring, employee notification, observation, audiometric testing, hearing protectors, training, and record keeping. All of these requirements are included in 29 CFR 1910.95, paragraphs (c) through (o). When workers are exposed to noise levels in excess of the OSHA PEL of 90 dBA, feasible engineering, or

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## APPENDIX C: OCCUPATIONAL EXPOSURE LIMITS & HEALTH EFFECTS (CONTINUED)

administrative controls shall be implemented to reduce the workers' exposure levels.

The NIOSH REL for noise is 85 dBA as a TWA for 8 hours, 5 dB less than the OSHA standard. The NIOSH criterion also use a more conservative 3 dB time/intensity trading relationship in calculating exposure limits. Thus, a worker can be exposed to 85 dBA for 8 hours, but to no more than 88 dBA for 4 hours or 91 dBA for 2 hours. Since employees in this evaluation worked extended 12-hour work shifts, exposures have to be 83 dBA or less according to the NIOSH REL.

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