



Application Advice from Clemco Industries Corp.

Third-Party Lab Verifies That Clemco Products Meet Proposition 65 Safe Harbor Exemption

No Warnings
Required for
Air-Hose Quick
Disconnect
and Vinyl-Covered
Blast Cabinet
Gloves



Tom EngerClemco Product Safety Engineer (The Safety Guy)

Proposition 65 and Why It Matters

Proposition 65 became law in California in 1986, and the California Office of Environmental Health Hazard Assessment (OEHHA) explains that "Proposition 65 requires businesses to provide warnings to Californians about significant exposures to chemicals that cause cancer, birth defects or other reproductive harm." The proposition presently lists about 900 chemicals, and if a company sells a product in California that contains one of these 900 chemicals, it needs to warn California residents of that chemical's presence.

However, OEHHA also states that "safe harbor levels, which include No Significant Risk Levels (NSRLs) for cancer-causing chemicals and Maximum Allowable Dose Levels (MADLs) for chemicals causing reproductive toxicity, have been established for many of the chemicals listed under Proposition 65." So, if a business proves that chemicals in their products that are listed in Proposition 65 are present in levels below the Safe Harbor Exemption exposure levels, the business does not need to issue a warning.

Clemco and Proposition 65

Two vendors notified Clemco that Proposition 65 chemicals may be present in subassemblies of the following Clemco products:



Product: Air-Hose Quick Disconnect Clemco Part: #00025 Proposition 65 Chemical: Lead



Product: Vinyl-Covered Blast Cabinet Gloves
Clemco Parts: #12710 & #12711
Proposition CF Chamilants Vinyl Chlorida and 1

Proposition 65 Chemicals: Vinyl Chloride and 1,1,2-Trichloroethane



The results validated that the exposure to these three chemicals when using these Clemco products falls below **Proposition 65** Safe Harbor Exemption exposure levels.

Clemco conducted industrial hygiene testing that simulated severe workplace exposure to the lead in its air-hose quick disconnect and to the vinyl chloride and 1,1,2-trichloroethane in its vinyl-covered blast cabinet gloves. The results validated that the exposure to these three chemicals when using these Clemco products falls below Proposition 65 Safe Harbor Exemption exposure levels. SGS Galson, a third-party lab, verified the results. Therefore, Clemco is not required to provide a Proposition 65 warning with these products.

Click to see the full SGS Galson lab reports.

Testing Procedures

Air-Hose Quick Disconnect Industrial Hygiene Testing Procedure

- Clemco assembled onsite the Apollo 600 Type 21 C/CE Respirator as instructed in Clemco Owner's Manual 23930.
- **2.** The air-hose quick disconnect was then placed in-line with the breathing assembly, per the owner's manual.



Collector placed in breathing zone.

Collector pump set at 2L/M.

Air-hose quick disconnect (part #00025) installed per Owner's Manual 23930.

- **3.** Sampling was performed for eight hours at the NIOSH maximum-allowed airflow of 14 cfm for Type 19C/CE continuous supplied-air respirators at ambient-compressor air temperature.
- **4.** Sampling was performed per the following SGS Galson collection and calibration instructions:

Method: mod. NIOSH 7303/mod. OSHA ID-125G; ICP

Analytical Technique: ICP/AES

Collection Medium: 37MCE 0.8 or 25MCE 0.8

Order Number: M739MCE/225-3100 Volume / Time / Area / Mass: 75-2000 L

Sampling Rate: 1-4 LPM



Proposition 65 Safe Harbor Exemption criteria may be found on OEHHA's

Current
Proposition 65 No
Significant Risk
Levels (NSRLs)
Maximum
Allowable Dose
Levels (MADLs)
web page.

- **5.** Control and test samples were sent to SGS Galson for lab analysis for lead exposure.
- **6. Results:** Lead levels were below SGS Galson's detection level of 0.38 ug., which is below the safe harbor limit of 0.5 ug/day.

Vinyl-Covered Blast Cabinet Gloves Industrial Hygiene Testing Procedure

Vinyl-covered blast cabinet gloves are a heavy poly-felt, vinyl-covered gauntlet attached to rubberized gloves. The arms of the operator using the gloves are in a negative-pressure environment with airflow from the interior of the glove through the exterior-vinyl gauntlet lining.

- **1.** Clemco placed a passive badge on the exterior of the gauntlet where the greatest wear of vinyl occurs.
- **2.** The blast cabinet was continuously operated for eight hours. Airflow in the cabinet during testing was 300 cfm, and the room changes per minute were 12.
- **3.** Sampling was performed per the following SGS Galson collection and calibration instructions:

Method: mod. NIOSH 1007; GC/FID BADGE

Analytical Technique: GC/FID Collection Medium: PM Order Number: 3M 3520

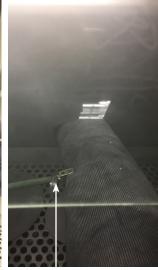
- **4.** Control and test samples were sent to SGS Galson for lab analysis for vinyl chloride and 1,1,2-trichloroethane exposure.
- **5. Results:** Vinyl chloride and 1,1,2-trichloroethane levels were below SGS Galson's detection levels of 0.7 ug. and 5 ug., respectively, which is below the safe harbor limit of 3 mg/day.



Glove gauntlets



Vinyl-covered blast cabinet gloves



Passive badge location



Clemco is not required to issue warnings for chemicals listed in Proposition 65 that are present in its air-hose quick disconnect and vinyl-covered blast cabinet gloves.

Summary of Third-Party Testing Results

Following are summaries of SGS Galson's results for its sample testing of lead, vinly chloride, and 1,1,2, trichloroethane:

Lead

LOQ: 0.38 ug,

• Result: < 0.38 ug over eight-hour exposure

Safe Harbor Exemption: 0.5 ug/day

Vinyl Chloride

• **LOQ:** 0.7 ug

• Result: < 0.7 ug over eight-hour exposure

Safe Harbor Exemption: 3 mg/day

1,1,2-Trichloroethane

• **LOQ**: 5 ug

• **Result:** < 5 ug over eight-hour exposure

Safe Harbor Exemption: 3 mg/day

Click to see the full SGS Galson lab reports.

Conclusion

Although the Clemco air-hose quick disconnect (product #00025) contains lead and Clemco vinyl-covered blast cabinet gloves (products #12710 and #12711) contain vinyl chloride and 1,1,2-trichloroethane, and these chemicals are listed in California Proposition 65, these chemicals fall below Proposition 65 Safe Harbor Exemption exposure levels for the two products. Therefore, Clemco is not required to provide a Proposition 65 warning with these products.