



**AUSTRALIAN  
ALUMINIUM  
COUNCIL LTD**

PO Box 63, Dickson  
ACT 2602

Ph: 6267 1800

[info@aluminium.org.au](mailto:info@aluminium.org.au)

Safe Work Australia  
Workplace Exposure Standards for Airborne Contaminants  
Via: <https://engage.swa.gov.au/wes-review-release-5>

8 November 2019

### **AUSTRALIAN ALUMINIUM COUNCIL RESPONSE TO: *COAL TAR PITCH VOLATILES***

The Australian Aluminium Council welcomes the opportunity to provide input into the Safe Work Australia (SWA) evaluation of workplace exposure standards (WES) for airborne contaminants and in particular coal tar pitch volatiles (CPTV). The industry has some concerns about proposed changes to other chemicals, but has focussed this response on CPTV.

The industry has a number of concerns with the proposed change in the WES for CPTV from 0.2mg/m<sup>2</sup> to 0.1µg/m<sup>3</sup> WES as proposed. The proposed change to the value of 0.1µg/m<sup>3</sup> appears to be primarily based around the risk for benzo(a)pyrene, however, the approach adopted regarding the exposure standard has been applied collectively to benzene (or cyclohexane) soluble fraction (BSF) components. We question the approach to continue with a single exposure standard which has been set at a value of minimal risk associated with a single component. This change, as outlined, represents a 2000 fold change, which we believe presents an over protection.

This may be because, our interpretation of the draft evaluation report, is that the proposed SWA WES for CTPV is as benzo[a]pyrene (B[a]P), rather than as BSF. This should be clarified in the guidance as it is not clear in the current draft.

Secondly, the recommended value is half the current aluminium industry exposure standard for B[a]P, from a TWA of 0.2ug/m<sup>3</sup> to 0.1ug/m<sup>3</sup>. The scientific evidence behind the proposed limit in relation to occupational exposures is unclear in the guidance, and there is no reference to the extensive Australian Institute of Occupational Hygienists Inc. (AIOH) position paper '*Polycyclic Aromatic Hydrocarbons (PAHs) and Occupational Health Issues*' (AIOH, 2016).

Finally, but of substantial importance is that feedback from the laboratory facilities who undertake testing, is that current sampling and / or analytical techniques may not be able to quantify data consistent with the proposed WES. Current analytical methodology can detect BSF to 0.02mg/m<sup>3</sup> and B(a)P to 0.1µg/m<sup>3</sup>. This means, the detection levels for BSF are 500 greater than the level proposed using current sampling media and analytical techniques whereas methodology for determining BaP has a detection limit at the level of the proposed standard.

The Australian aluminium industry places the highest value on the health and safety of the people in our operations. We use a range of controls to minimise occupational exposures, however even with these controls including elimination/substitution, engineering and administrative controls in place, operations will be relying on personal protective equipment.

The Council and our members would welcome the opportunity to be involved in ongoing consultation on this matter.

Yours sincerely,



**MARGHANITA JOHNSON**

EXECUTIVE DIRECTOR

AUSTRALIAN ALUMINIUM COUNCIL

M +61 (0)466 224 636

T +61 (0)2 6267 1800

[marghanita.johnson@aluminium.org.au](mailto:marghanita.johnson@aluminium.org.au)