

Commenting form for occupational exposure scenarios for diamminedichloropalladium

Please exclusively use the commenting form as provided below. Comments and questions submitted by using different formats cannot be reflected.

In addition to suggestions for improvements, also general validation/confirmation statements are very much appreciated.

Such confirmation statements are important, e.g. when other comments would require a modification of the existing exposure scenarios.

Chapter in the occupational exposure scenario document	Section in the exposure scenario (if appropriate)	Sub-section in the exposure scenario (if appropriate)	Comment/Question	Response from and action taken by the occupational exposure consultant
9.1			I would very much recommend to use standard phrases and not text which can only be used in this particular ES. The background is that the ES have to be translated to all EU languages. There are standard phrases already suggested and translated by BDI and I think also by CEFIC. This would ease the workload in the companies when transferring the ES to their system dramatically. This issue is also known quite long time at EUROMETAUX. When we don't keep track there from the beginning we will end up with a lot of work during implementation.	This comment was taken forward to the last meeting. There it was decided that standard phrases will currently not be included in the exposure scenarios (ESs). It was proposed that standard phrases could be included when translating the ES for the eSDS if PMC Members wish so (consortium decision). (Please also refer to the email communication on 26th of February.)
9.1			A smaller issue is the use of ACs. It is good to use them in the overview on the first page but later on it is not really user friendly. Here the uses should be mentioned instead of the ACs as in the ES later on.	We also took this comment forward to the meeting in December and the other members agreed with your proposal to include the description of the ACs in the exposure scenario instead of only including the AC numbers. This is done in the final draft version of the exposure scenarios.
			Standard phrases have to be used!!! I can't repeat it often enough. ES are integral parts of the SDS and therefore have to be provided in the national language. Each SDS generation system I know or heard about is using these phrases. In case prose is used the sentences can't be used somewhere else and have to be translated for just one single use. This is inefficient. If you want to use text blocks please offer directly the translation to the 27 official European languages. Sentences related to the sentence before are already much too complex.	Please refer to the first comment above.
			In other consortia a different naming of the AC has been used. They called it either GES (generic ES) or CES (contributing ES). It is a nice to have, not a must, but would make life easier for DU.	The activity classes (ACs) are in our opinion different from generic exposure scenarios with regard to the level of detail. ACs are required in the exposure scenario to group similar tasks and operational conditions and they are needed to use available monitoring data in an efficient way. The term AC is also used in higher tier exposure modelling tools and describes best what is actually meant: Groups of similar activities of workers with respect to the operational conditions. Please also note that this sophisticated term only occurs in brackets in the new version of the manufacturing ES.
			Foot notes are helpful for people with the entire ES. They can't be transferred to the SDS system so they will be lost in the transfer.	Please note that the developed ES are exclusively meant for their use in the CSR, i.e. for potential review by regulators. We strongly suggest to maintain a format which suits this purpose. ES for eSDS would anyway need to be modified not only with respect to standard phrases but also in terms of brevity.

Chapter in the occupational exposure scenario document	Section in the exposure scenario (if appropriate)	Sub-section in the exposure scenario (if appropriate)	Comment/Question	Response from and action taken by the occupational exposure consultant
			The sentence: "Any potentially required separation of workers from the emission source is indicated above under "Frequency and duration of exposure" leads to a section where nothing is mentioned on the separation.	It is noted that the complete statement should be considered as given under "separation". The duration of exposure only specifies how long a worker should be exposed at maximum, or, in other words, how long he should be separated from the emission at minimum. Because of this obvious correlation, both sections are linked in the ES. Please indicate if you need further clarification.
			The header "Use in preparation" and "content in preparation" are commonly used. One should be careful what to put in there. A "Yes" without any further comment would not be too informative.	We agree that all fields should be carefully filled-out in an ES. It is noted that "Yes" is not at all nominated in the section the comment is referring to in any of the DDP ES.
9.2	2. Operational conditions and risk management measures		We need one more process step: Wet chemical reaction	We changed the name of the workplace to "Wet chemical reaction" and included the task "reduction" in the column "involved tasks" in the final draft version of the exposure scenario.
9.2	2.1 Control of workers exposure		We need one more process step: Wet chemical reaction	see above
9.2	3. Exposure estimation and reference to its source		We need one more process step: Wet chemical reaction	see above
9.0.1.1 Measured data			Table 3 last column "Maximum" The data for AC2 and AC 10 are obviously wrong.	Thank you for this comment, you are absolutely right. The table was corrected accordingly.
9.0.1 Methodology – occupational exposure			Page 5: "Furnace loading may be seen ..." In our opinion unloading of drying furnace must also be considered as exception from the wet or damp use conditions.	We rephrased the text to provide a better explanation why exposure situations with higher exposure potential that could occur during furnace loading and unloading are not relevant for DDP. The corresponding activity class (AC6) was not nominated by any of the manufacturers of DDP. However, we would be very keen to know, how processes with a drying furnace are relevant for DDP and to which moisture content DDP may be dried. This is very important for us to know since currently exclusively low and very low dusty forms of DDP are reflected in the exposure scenarios (although we are still waiting for results of dustiness test confirming this dustiness, which was decided to be used in one of the meetings). If DDP is however dried resulting in more dusty forms, we would have to consider these in the exposure assessment.
9.3	2. Operational conditions and risk management measures		Footnote: "It is noted that ..." This explanation is not understandable in our opinion. Before the plating process there is no palladium metal in the solution.	When developing the first draft, we did not know if and when DDP is transformed during the process. This question was clarified at the last meeting and the word "before" is therefore changed to "during" in the final draft version of the exposure scenario.
9.3	2.1 Control of workers exposure		Row: "Mechanical processing ..." and also "Handling of ..." The amount of < 25 % of DDP needs to be explained. In our understanding there is no massive DDP on the surface after plating.	When developing the first draft, we did not know if and when DDP is transformed during the process. For pre-cautionary reasons, we included workplaces to reflect handling of objects with DDP on the surface in case that DDP is not transformed during the plating. The according passages of the ES were totally re-worked.