

Request for Action!

Your Comments are Needed Regarding:

Safe Design of Exhaust Ventilation Systems for Research Laboratories

AIHA Lab Health and Safety Committee

On behalf of the American Industrial Hygiene Association (AIHA) a code request change was submitted to the International Code Council and was presented at an IMC committee public hearing on 9/5/03. This code change request concerns a section in the International Mechanical Code, section 510, which addresses “Hazardous Exhaust Systems.” It is likely that this code has been adopted in your state or will be adopted within the next few years. This section contains language that conflicts with NFPA 45 and ANSI Z9.5, requires duct extinguishment, leads to the avoidance of the beneficial practice of manifolding exhaust ducts, and also results in construction that is difficult to upgrade when future modifications are necessary.

AIHA submitted code change language that would exempt laboratories from this section with the understanding that one would follow NFPA 45, Chapter 6 and ANSI Z9.5, and would limit duct flammable concentrations to less than 25% of the LEL. Subsequently, a slight modification to this proposal, simplifying, but supporting the proposal, was presented by another organization. These code change proposals were not approved by the IMC Committee, although the committee member most experienced with these matters voted in favor.

The AIHA Lab Health and Safety Committee website

<http://www2.umdj.edu/eohssweb/aiha/technical/ventilation.htm#Hazardous> contains a considerable amount information on this topic. This site includes the [AIHA proposal to conditionally exempt labs from IMC 510, a counterproposal](#) which supports, yet simplifies our proposal, the [IMC committee hearing results](#), and a [letter of appeal to the ICC](#) to overturn their ruling of disapproval. It also contains an [AIHA Position Paper](#) on this topic, a link to the [ICC comment form](#) and other information. In addition to this website, many articles have been written in publications which include Chemical Health and Safety, HPAC Engineering, among others.

We bring to your attention the opportunity to submit a public comment on the code committee's action to disapprove our request. Instructions as well as a form in Word or PDF for submitting comments are posted at:

<http://www.iccsafe.org/cs/codes/publicforms.html>. There is also a copyright release form that must be completed by persons submitting comments

All comments on the public hearing results, both in support or disagreement with the committee actions are **due by January 14, 2004**. It is important to note that these public comments could and should influence the final decision (at a May 17-20, 2004 meeting) by the ICC committees on their initial rulings. In other words, IMC Committee could reverse their decision of disapproval of the AIHA code change proposal if they are persuaded by public comment.

We suggest you review the original AIHA proposal, the modified proposal, the committee response and the appeal letter at the AIHA Lab Health and Safety Committee website listed above, then refer to the comment form on the ICC site. **Items 2-4 of the AIHA appeal letter may serve as useful background for comments on the committee action.**

Please take the time to inform yourself on these issues as they can have a real impact on the quality and safety of your lab design.

Questions – Contact Ken Kretchman at 919-515-6860 or kwkretch@gw.fis.ncsu.edu.