Cal/OSHA Draft Substance Summary for the June 20, 2017 HEAC Meeting

Substance name: Hydrogen Sulfide

CAS: 7783-06-4 MW: 34.076

Synonyms: Hydrosulfuric acid

Molecular formula: H₂S Structural formula: +

ormula: H

1 ppm to 1.4 mg/m³ conversion factors at 25 °C and 760 mm/Hg:

GHS Classification

Signal: Danger

GHS Hazard Statements

H220: Extremely flammable gas [Danger Flammable gases - Category 1]

H280: Contains gas under pressure; may explode if heated [Warning Gases under pressure -

Compressed gas, Liquefied gas, Dissolved gas]

H319: Causes serious eye irritation [Warning Serious eye damage/eye irritation - Category 2A]

H330: Fatal if inhaled [Danger Acute toxicity, inhalation - Category 1, 2]

H370: Causes damage to organs [Danger Specific target organ toxicity, single exposure - Category 1]

H400: Very toxic to aquatic life [Warning Hazardous to the aquatic environment, acute hazard -

Category 1]

H410: Very toxic to aquatic life with long lasting effects [Warning Hazardous to the aquatic environment, long-term hazard - Category 1]

Physical characteristics at room temp: Colorless gas with a strong odor of rotten eggs.

Special physical characteristics if any: Heavier than air.

Flammability and other hazards: Extremely flammable. Corrosive. Reacts with strong oxidants.

Upper Explosive Limit: 44% Lower Explosive Limit: 4.0%

Major commercial form(s): Gas

Uses/applications: Main use is as precursor of elemental sulfur. Also as precursor of other chemicals used in paper manufacture, and in analytical chemistry

Occupations with Potential Exposure to Hydrogen Sulfide

Occupational exposures to hydrogen sulfide occur in such industries as animal husbandry and animal product production; sugar production; sewage, pipeline and other excavation trades; fermentation process industries; gas and petroleum production and pipeline maintenance;

geothermal energy production; chemical production and processing; paper manufacture; synthetic fiber manufacture and metallurgy.

Occupational Exposure Limits and Other recommendations:

Title 8 PEL (1992): 10 ppm Ceiling 50 ppm STEL 15 ppm

OSHA PEL (1971) Ceiling 20 ppm, one-time 10 minute peak 50 ppm

ACGIH TLV (2010): 1 ppm STEL 5 ppm

NIOSH REL (2000): 10 ppm 10 minute Ceiling 100 ppm IDLH

MAK (2006): 5 ppm, 7.1 mg/m³

WEEL (2013): Hydrogen Sulfide ERPG1: 0.1 ppm ERPG-2 30 ppm ERPG-3:100 ppm

Other recommendations:

Source and date	Findings/Recommendations	Basis/source/ref(s)	Discussion and Assessment
OEHHA REL	Acute: 42 μg/m ³ (30 ppb) Chronic: 10 μg/m ³	A: human volunteers exposed to increasing H2S until odor detected. C: 90-day inhalation study in mice, CIIT 1983c	A critical effect: Headache, nausea, physiological responses to odor C critical effect: Nasal histological changes in mice
Prop 65	Not listed	19030	
NTP	Not studied.		
EPA	IRIS RfC: 2.0 μg/m ³	Nasal lesions of the olfactory mucosa	Relevancy to humans of the olfactory lesions seen in rodents is suggested by reports of decreased persistent olfactory function in workers exposed chronically to hydrogen sulfide
IARC	Not classified		
EU	5 ppm TWA 10 ppm STEL	SCOEL/SUM/124 June 2007	An uncertainty factor of 2 used to account for differences in exposure pattern (sub-chronic vs. chronic) and limited dataset for pathological findings.

Peer-reviewed journal articles used for proposed PEL

Respiratory

Bhambhani 1991; Bhambhani 1994; Bhambhani 1996; Bhambhani 1997

This series of studies on the physiological effects in controlled human exposure found metabolic effects from short-term exposure to 5 ppm H2S that, while causing no acknowledged effect in the subjects, did result in Page 2 of 11

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altered enzymatic levels consistent with the accepted mode of action of H2S toxicity. This toxic mode of action is believed to be the impairment of mitochondrial respiration by inhibition of cytochrome oxidase, thereby reducing energy production.

Study type: human volunteer

Method: Healthy male and female volunteers were exposed to 0.5 - 10 ppm H2S for 30 minutes while operating a cycle ergometer at different energy intensities over the course of several studies. During these studies, metabolic and cardiovascular measurements were monitored at submaximal and maximal reference points so that H2S-induced effects could be associated with moderate exercise and associated cardiac changes. Real-time physiological and perceptual responses were monitored and blood samples and muscle tissue biopsies obtained.

Results:

Bhambhani 1991

Results: 30-minutes exposures at 0, 0.5, 2.0 and 5.0 ppm H2S. 16 males, age: 25.2 ± 5.5 . Physiological measurements at submaximal and maximal exercise were obtained. There was a tendency for oxygen uptake to rise with increasing H2S concentrations at all three exercise durations. Heart rate and expired ventilation were unaffected by H2S concentration. Only at the maximum exercise level at 5.0 ppm was a significant difference in oxygen uptake observed between controls and H2S exposed subjects. Blood lactate concentrations increased in each exposure group at each exercise intensity but only lactate increases in the 5.0 ppm exposed group were significantly different from controls. Maximal power output of this exposed group was not significantly different from controls.

Bhambhani 1994

Results: 30-minutes exposures at 50% aerobic power to 0 and 5.0 ppm H2S. 13 males, age: 24.7 ± 4.6 ; 12 females age: 22.0 ± 2.1 . There were no significant differences between the two exposures for metabolic, cardiovascular, arterial blood and perceptual measures in either sex. Blood lactate concentrations in exposed men and women were not significantly different from controls, although 70% of men and 83% of women had elevated lactate compared to controls.

Bhambhani 1996

Results: 30-minutes exposures at 50% aerobic power to 0 and 5.0 ppm H2S. 13 males, age: 24.7 ± 4.6 ; 12 females age: 22.0 ± 2.1 . Immediately following exercise, muscle biopsies were obtained and analyzed for markers of aerobic and anaerobic metabolism. Multiple measures of markers of energy metabolism determined by enzymatic activity of the muscle tissues obtained during exposure/exercise were mostly not significantly different from controls. Specifically, cytochrome oxidase activity, the putatitve enzyme associated with H2S toxicity, was not significantly different between exposed men and women and controls. Citrate synthase decreased significantly (p=0.006) in exposed men and there was a tendency for cytochrome oxidase to decrease in exposed men but not significantly. In this study negative correlations were observed between aerobic capacity and muscle lactate concentrations, leading the authors to suggest that the healthy capacity of the subjects was a factor in attenuating the effects of 5 ppm H2S.

Bhambhani 1997

Results: 30-minutes exposures at 50% aerobic power to 0 and 10.0 ppm H2S. 15 males, age: 24.7 ± 4.6 ; 13 females age: 22.0 ± 2.1 . Cardiorespiratory measurements were monitored as well as the other endpoints. A significant decrease in oxygen uptake and a significant increase in blood lactate was observed in exposed men and women. No significant differences were observed in arterial blood parameters and cardiovascular responses. The biochemical markers of energy production in muscle biopsies were not significantly different between

controls and exposed subjects however there was a tendency for muscle lactate to increase and citrate synthase activity to decrease in both genders when exposed to 10.0 ppm H2S.

P Jappinen, 1990

Study type: cross-sectional

Methods: 26 male pulp mill workers (mean age 40.3) with a daily exposure to H2S in the workplace (mean 4.5, range 1-11 ppm), and 10 volunteers, who had asthma (mean age 42.4) exposed to 2 ppm H2S in a laboratory setting. The respiratory function of the pulp mill workers was monitored by measuring forced vital capacity (FVC), forced expiratory volume in one second (FEV1) at least one day off work and at the end of a workday. Bronchial responsiveness was determined by administering histamine diphosphate aerosol at increasing concentrations until a fall of 15% in FEV1 was achieved or the maximum histamine diphosphate concentration of 3 2% was reached. Likewise, bronchial responsiveness was determined after at least one day off work and at the end of a workday. The 10 asthmatic subjects were exposed to 2 ppm of H2S for 30 minutes in an exposure chamber. Airway resistance (Raw) and specific airway conductance (SGaw) were assessed by a body plethysmograph, and the ventilatory capacities were measured with a flow volume spirometer. Values derived from a Finnish general population were used as predicted normal values for FEV1, FVC, Raw, and SGaw. **Results:** No significant changes in respiratory function or bronchial responsiveness related to exposure to hydrogen sulfide in the pulp mill workers were found. Similarly, no significant changes were observed in subsets of workers (workers exposed to at least 1 ppm, workers who smoked, exposed workers who had previous allergies or bronchial asthma, and five atopic subjects with a positive reaction in the skin prick test. There were no significant changes in the mean FVC, FEV1, and forced expiratory flow values after exposure to H2S in subjects with asthma. In two asthmatics, changes in Raw and SGaw were over 30% in indicating clinical bronchial obstruction.

Brenneman et al. (2000)

Study type: sub-chronic inhalation in rats

Method: 10-week-old male CD rats (12/ group) were exposed to 0, 10, 30, or 80 ppm (0, 13.9, 42, or 111 mg/m³) H2S for 6 hr/day, 7 days/week, for 10 weeks. Due to the complexity of the rat nasal cavity, animal noses were dissected and examined for lesions and neuronal effects at 6 levels.

Results: an array of effects at different concentrations were observed at the different levels. No effects were observed in the control or 10 ppm exposure animals that were considered treatment-related. Nasal lesions of the olfactory mucosa were observed in the 30 and 80 ppm exposure animals mostly in a dose dependent manner. Basal cell hyperplasia was observed in both exposure groups at one level of the nasal cavity but was more pronounced in the 30 ppm exposure group. Olfactory neuronal loss and basal hyperplasia occurred at 2 of the 6 nasal levels from exposure to 30 ppm H2S.

Ocular/ Irritation

Vanhoorne, 1990

Study type: Cross sectional; rayon "spinners" concurrently exposed in H2S and C2S compared to non-exposed workers.

Method: 123 male viscose rayon workers in 17 different job categories exposed to hydrogen sulfide (H2S) and/or carbon disulfide (CS2) and 67 referents not exposed to either of these chemicals answered questions on eye irritation complaints in a self-administered questionnaire.

Results: Personal exposure varied from 4 to 112 mg/m³ for CS2 and from 0.2 to 8.9 mg/m³ (0.14 – 6.39 ppm) for H2S. A combined exposure measure was calculated using principal component analysis. When categorized into exposure groups (H2S: 0, 0-5, >5 mg/m³; CS2: 0, 1-30, 31-90, >90 mg/m³), eye symptoms in exposed workers were significantly different from controls only in the highest exposure categories (H2S > 5; CS2> 90). It was not

possible to discern what chemical caused the eye effects observed in this study however a NOAEL for the combined gas exposure was 5/90 mg/m³ H2S/CS2.

Fiedler, 2008.

Study Type: human volunteers exposed in test chamber.

Methods: 74 healthy subjects [35 females, 39 males; mean age (\pm SD) = 24.7 \pm 4.2) were exposed to 0.05, 0.5, and 5 ppm H2S. During each 3-hour exposure session, subjects completed ratings and tests before H2S exposure (baseline, first hour) and during the final hour of the 2-hr exposure period. Subjects completed analog scales to rate pleasantness, intensity, and irritation of the H2S odor, and to evaluate environmental qualities. Behavioral (odor ratings, symptoms and sensory function) and cognitive measures (visual acuity and visual contrast sensitivity, simple reaction time, finger tapping and symbol-digit substitution) were evaluated.

Results: Dose–response relationships between a reduction in air quality and increases in ratings of odor intensity, irritation, and unpleasantness were observed. After controlling for baseline, a significant exposure × time interaction for odor ratings, irritation, intensity and unpleasantness was observed at the start of exposure. After 2 hours, only the 5 ppm scores were significantly different from the other 2. Total symptom severity was not significantly elevated across any exposure condition, but anxiety symptoms were significantly greater in the 5-ppm than in the 0.05-ppm condition. No dose–response effect was observed for behavioral or cognitive measures. Verbal learning was compromised during each exposure condition.

Reproductive/Developmental

Dorman 2000

Study type: sub-chronic rat study, pre-mating, gestational and postnatal exposure

Method: SD male and female rats exposed for 4 weeks prior to mating for 6h/day, 7/day week to 0, 10, 30 and 80 mg H2S mg/m3. Exposure continued to GD 19 and until PND 18. Offspring were evaluated using motor activity, passive avoidance, functional observation battery startle response and neuropathology (PND 22 and 60). **Results:** There were no effects on reproductive performance based on mating success and several litter characteristics. There was a nonsignificant higher incidence of testicular tubular degeneration at the highest dose.

Skrajny 1992

Study type: sub-chronic rat study, gestational and postnatal exposure

Method: exposed groups of 20 pregnant Sprague-Dawley rats to 0, 28, or 105 mg/m 3 (0, 20, or 75 ppm) H₂S 7 hours/day from day GD 5 through PND 21.

Results: Increased (p < .05) serotonin levels were observed in the frontal cortex on day 21 postpartum of pups exposed to 20 ppm hydrogen sulfide, whereas increased (p < .01) serotonin levels were observed in both the cerebellum and frontal cortex on postpartum days 14 and 21 in pups exposed to 75 ppm hydrogen sulfide. Norepinephrine levels were increased (p < .05) at 75 ppm in the cerebellum at postpartum days 7, 14, and 21, whereas norepinephrine levels were significantly increased in the frontal cortex only at day 21 postpartum. At 20 ppm, frontal cortex norepinephrine levels were decreased compared to controls on days 14 and 21.

Hayden 1990

Study Type: sub-chronic rat study, gestational and postnatal exposure

Method: pregnant SD rats exposed to 28, 70 or 110 mg/m for 7 hr/day on GD 6 until PPD 21.

Results: Dose – dependent increase in mean parturition time and difficult delivery of 10, 20 and 42% over matched controls. No statistical analysis presented but parturition time in controls (82.5 - 124 min) was

considered too variable for statistical comparison with treated groups (105-148). No difference in maternal body weight gain between two groups. Maternal liver cholesterol content was elevated significantly on day 21 postpartum following exposure to 75 PPM H2S each day for 6 weeks.

Neurological

Roth 1995

Study Type: sub-chronic rat study, gestational and postnatal exposure

Method: SD rat dams exposed to 28 -70 mg 7 hr/day from GD5. Pups born to treated dams were exposed perinatally up to PND 21. Morphological analysis of one cerebellar Purkinje cell per pup was performed. A quantitative analysis of dendritic growth was conducted to distinguish random versus nonrandom growth. **Results:** Cells from H2S-exposed rats underwent a significant amount of nonsymmetrical or nonrandom growth, suggesting that H₂S affected the branching pattern. The resulting alterations in dendritic arborization appeared to be in response to H₂S exposure at the 20 and 50 ppm (28 or 70 mg/m³) levels such that the 20 ppm (28 mg/m³) level may be considered a low-effect rather than a no-effect level.

Hannah 1989

Study Type: sub-chronic rat study, gestational and postnatal exposure

Methods: Rats exposed from GD5 to PND 21 to 75 ppm H2S for 7 hours/day.

Results: Brain levels of aspartate, γ -aminobutyric acid (GABA), glutamate, and taurine were significantly depressed, but no follow-up studies were conducted to determine if these changes affected behavioral or structural development

Population Studies

Ecological investigations – community-based studies of low level H2S exposure (ppb) - are difficult to evaluate for relevance to occupational exposure analysis. Many factors – continuous exposure to very low concentrations, confounders, lack of exposure measurements – limit the applicability of some studies to interpreting occupational exposures. There are unique studies of H2S exposure from geothermal sources that do show little or no effect of H2S exposure in the ppb range.

Bates 1998

Study Type: case-control

Methods: Cancer registry and hospital morbidity data were obtained from 1981 - 1990 for community adjacent to a geothermal H2S and compared with non-exposed communities. Standardized incidence ratios (SIR) were calculated comparing the two groups. Diagnostic categories were based on Known targets of H2S toxicity – the respiratory, neurological and ocular systems.

Results: The exposed population had an elevated nasal cancer rate but cases were limited (4). For a subset of women, the SIR cancers of the trachea, bronchos and lung was 1.48 (1.03 - 2.06). For morbidity, diseases of the nervous system and the eye showed elevated SIR.

Bates 2015

Study Type: Ecological, cross-sectional

Methods: 1637 adults living 3 years or longer (median = 18 years) with low-level H2S exposure from geothermal sources were randomly selected from high medium and low H2S exposure areas. The median residential H2S concentration was 20.3 ppb and the median workplace concentration 26.4 ppb. Spirometry testing was obtained of the participants and compared with were compared with predicted population values. Departures from the predicted value were outcomes for linear regression models using quartiles of the H2S exposures. Separate models examined participants with and without asthma or COPD and never- and ever-smokers.

Results: None of the exposures were associated with lung function decrement. No evidence that long-term H2S is associated with increased asthma or COPD risk.

Discussion: For all participants and sub-groups there was no evidence of an adverse association between ambient H2S and any spirometric measures. More significantly, there was no evidence of an association between H2S and COPD which might be expected from long-term exposure to a reactive, irritant gas. Potential exposure misclassification may have attenuated any actual exposure- response relationships but no effect was seen across 4 subgroups.

Bates 2017

Study Type: Ecological

Methods: 1637 adults living 3 years or longer (median = 18 years) with low-level H2S exposure from geothermal sources were randomly selected from high medium and low H2S exposure areas. The median residential H2S concentration was 20.3 ppb and the median workplace concentration 26.4 ppb. Participants underwent comprehensive ophthalmic examination including pupil dilation and lens photography to capture evidence of any ocular opacities. Data analysis examined associations between the degree of opacification/nuclear color/cataract in relation to H2S exposure.

Results: No associations were found between estimated H2S exposures and any of the 4 opthalmic outcome measures.

Reed 2014.

Study Type: ecological

Methods: 1637 adults living 3 years or longer (ages 18-65, median residence time = 18 years) with low-level H2S exposure from geothermal sources were randomly selected from high medium and low H2S exposure areas. H2S exposure at the time of participation and past exposure were calculated from data obtained from H2S monitoring stations and exposure metrics were created for contemporary and the prior 30 years. Neuropsychological tests of visual and verbal memory, attention, fine motor skills, psychomotor speed and mood administered to participants were reported as being affected by H2S or relevant to neurotoxic assessment. Association between cognition and measures of H2S exposure were investigated with multiple regression while covarying demographics and factors known to be associated with cognitive performance. **Results:** No association was found between H2S exposure and neuropsychological and psychomotor

Finnbjornsdottir 2016

assessments.

Study type: Ecological, urban population exposed to H2S from geothermal energy plant.

Methods: Hospital data from patient- and population-registers on heart disease, respiratory disease and stroke from an acute care institution in the study area were obtained from 1 January, 2007 and 30 June, 2014. The population was geocoded into 5 areas within the H2S plume and the total number of individuals in each area calculated within age groups (18-59, 60-72, 73-80, and 81 and older) and gender. A national registry was used to count the total number of people at risk in the area according to the gender and age groups. Exposure estimates were modeled and exposure calculated by different percentiles 50% (2.46 μg/m3), 60% (3.16 μg/m3), 70% (4.14 μg/m3), 80% (5.74 μg/m3), 85% (7.00 μg/m3), 90% (8.80 μg/m3) and 95% (11.68 μg/m3). A generalized linear

model assuming Poisson distribution was used to investigate the association between emergency hospital visits for each disease endpoint and H2S exposure.

Results: The total number of emergency hospital visits was 32961 with a mean age of 70 years. In fully adjusted un-stratified models, H2S concentrations exceeding 7.00μg/m3 were associated with increases in emergency hospital visits with heart disease as primary diagnosis (RR): 1.067; 95% confidence interval (CI): 1.024–1.111). Among males an association was found between H2S concentrations exceeding 7.00μg/m3, and heart disease (RR: 1.087; 95% CI: 1.032–1.146) and among those 73 years and older (RR: 1.075; 95% CI: 1.014–1.140).

HEAC Health-based assessment and recommendation

The volunteer studies by Bhambhani and Fiedler demonstrate that effects of exposure to H2S can be detected in humans at 5 ppm. These are the lowest observed detrimental effects of any controlled study in humans or lab animals. The changes in physiological and biochemical parameters measured in the Bhambhani studies are consistent with the mode of action for H2S – inhibition of energy metabolism - but these effects were not considered adverse. Statistically significant changes and trends were observed between 5 and 10 ppm while no perceptual or cognitive changes were reported in the subjects. These effects were not consistent between men and women however cardiac differences between the two sexes could explain this. In Fiedler, there was no significant increase in the total severity measure (the sum of all symptom categories) between H2S concentrations and control however there was a significant increase in upper and lower respiratory irritation over time in the 5 ppm exposure group. Both studies utilized relatively healthy subjects (approximate age = 25) so it is likely these marginal adverse effects would be realized in the general population.

Few occupational studies are available to assess the effect of H2S. Many studies are of workers exposed to multiple irritant chemicals and the exposure are not well-characterized. Most H2S measurements in Jappinen were between 2 and 7 ppm and in Vanhoorne H2S concentrations ranged from 0.2 and 11.8 ppm so are comparable to those in the volunteer studies. No respiratory effects were observed and irritation only observed at > 5.0 ppm. Jappinen raises the concern of a healthy worker effect in that study however the lack of any differences in the 4 subgroups undergoing histamine challenge suggests that H2S did not have respiratory impacts at 5.0 ppm.

The developmental/neurological differences observed in rats at 20 ppm H2S and above in Skrajny, Roth and Hannah are difficult to apply to the assessment of H2S for a number of reasons. The neurotoxicological significance of the neurochemical levels (Skrajny and Hannah) and morphological differences (Roth) have not been determined nor have they been repeated in additional studies. A mechanism of action of H2S for these effects has not been identified. The biochemical and physiological role of H2S is currently the subject of great interest as it was recently identified as a messenger molecule for a wide variety of cellular processes so new information about its neurological role will assist interpretation of these results at a later date.

Recommendation: A PEL of 1 ppm is recommended based on the studies of Bhambhani (1991, 1994, 1996, 1997). Non-adverse effects were observed in this healthy study population after 30 minute exposure to 5 ppm H2S under moderate exercise. The biochemical changes observed in these studies are in agreement with the inhibition of aerobic metabolism that is considered to be the toxic mode of action of H2S. Extended to 8 hours, these changes could result in discernible fatigue, a symptom that has been reported in multiple occupational studies of H2S, and possibly other effects. No respiratory effects have been reported at 5 ppm however at this concentration irritation has been reported and 2 ppm H2S did have respiratory effects in asthmatics.

<u>Usage information: EPA TSCA Chemical Data Reporting (CDR), EPA Toxics Release</u> Inventories (TRI)), other sources:

In 2015, there were 27 TSCA CDR records for hydrogen sulfide (usage in excess of 25,000 lbs) in U.S. Of these, 2 were in California. In 2016 there were 519 TRI records for hydrogen sulfide of which 20 were in California.

Measurement/Implementation Feasibility

OSHA Method NIOSH Method

ID 141 (validated) 6013

Estimated LOD/LOQ 0.4/0.9 ppm (2 liters) $11 \mu g/17 \mu g$

Measurement issues silver nitrate activated charcoal tube

impregnated -some lots high S-

filter

Both NIOSH and OSHA methods are adequate to detect at the respective Ceiling Limits. The OSHA method is adequate to detect the TLV of 1 ppm. An issue with the OSHA method is that cassettes would have to be changed each hour at the minimum flow rate of 0.1 L/min if concentrations were near the OSHA Ceiling Level. Another issue is handling of the impregnated filter with forceps is necessary, and the impregnated filters are light sensitive so the cassettes must be shielded with aluminum foil or black tape during storage and transport. Store in a dark environment.

Economic Impact Analysis/Assessment

The Division has made a determination that this proposal is not anticipated to result in a significant, statewide adverse economic impact directly affecting businesses, including the ability of California businesses to compete with businesses in other states. This proposal will not have any effect on the creation or elimination of California jobs nor result in the creation or elimination of existing businesses or affect the expansion of existing California businesses. The Division anticipates that any potential costs will be balanced by avoiding or minimizing the costs inherent in workers' compensation claims, lost work time, and productivity losses that would have been caused by exposure related illness of employees.

The PEL proposed is consistent with recent scientific findings, of which professional health and safety staff and consultants of these employers and others with significantly exposed employees should be aware. Many of these entities already seek to control employee exposures to substances to levels below existing PELs in the interest of business continuity and minimization of tort and workers compensation liability.

Setting a Permissible Exposure Limit for hydrogen sulfide that is up-to-date and consistent with current scientific information and state policies on risk assessment will send appropriate market signals to employers with respect to the costs of illness and injury, which chemicals can impose on workers and their families, the government, and society at large. With appropriate market signals, employers may be better able to protect employees from hydrogen sulfide exposures in the workplace an also impose less of a burden on workers and society. There are no anticipated benefits to the state's environment.

The economic benefits from the proposed PEL will result primarily from reduced health risk among exposed workers.

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