# **Benzyl methacrylate**

sc-233991

**Material Safety Data Sheet** 



Hazard Alert Code Key: EXTREME HIGH MODERATE LOW

## Section 1 - CHEMICAL PRODUCT AND COMPANY IDENTIFICATION

#### **PRODUCT NAME**

Benzyl methacrylate

## STATEMENT OF HAZARDOUS NATURE

CONSIDERED A HAZARDOUS SUBSTANCE ACCORDING TO OSHA 29 CFR 1910.1200.

## **NFPA**



#### **SUPPLIER**

Company: Santa Cruz Biotechnology, Inc.

2145 Delaware Ave Santa Cruz, CA 95060

Telephone: 800.457.3801 or 831.457.3800

Emergency Tel: CHEMWATCH: From within the US and Canada:

877-715-9305

Emergency Tel: From outside the US and Canada: +800 2436 2255

(1-800-CHEMCALL) or call +613 9573 3112

#### **PRODUCT USE**

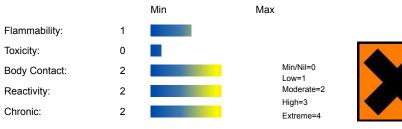
Monomer.

#### **SYNONYMS**

C11-H12-O2

## **Section 2 - HAZARDS IDENTIFICATION**

## **CHEMWATCH HAZARD RATINGS**



#### **CANADIAN WHMIS SYMBOLS**



## EMERGENCY OVERVIEW

#### RISK

Irritating to eyes, respiratory system and skin.

#### POTENTIAL HEALTH EFFECTS

#### **ACUTE HEALTH EFFECTS**

#### **SWALLOWED**

■ The material has NOT been classified as "harmful by ingestion". This is because of the lack of corroborating animal or human evidence. The material may still be damaging to the health of the individual, following ingestion, especially where pre-existing organ (e.g. liver, kidney) damage is evident. Present definitions of harmful or toxic substances are generally based on doses producing mortality (death) rather than those producing morbidity (disease, ill-health). Gastrointestinal tract discomfort may produce nausea and vomiting. In an occupational setting however, unintentional ingestion is not thought to be cause for concern.

#### FVE

■ This material can cause eye irritation and damage in some persons.

#### SKIN

- This material can cause inflammation of the skin oncontact in some persons.
- The material may accentuate any pre-existing dermatitis condition.
- Skin contact is not thought to have harmful health effects, however the material may still produce health damage following entry through wounds, lesions or abrasions.
- Entry into the blood-stream, through, for example, cuts, abrasions or lesions, may produce systemic injury with harmful effects. Examine the skin prior to the use of the material and ensure that any external damage is suitably protected.

#### **INHALED**

- The material can cause respiratory irritation in some persons. The body's response to such irritation can cause further lung damage.
- Inhalation hazard is increased at higher temperatures.
- The material has NOT been classified as "harmful by inhalation". This is because of the lack of corroborating animal or human evidence. In the absence of such evidence, care should nevertheless be taken to ensure exposure is kept to a minimum and that suitable control measures be used, in an occupational setting to control vapors, fumes and aerosols.
- Acute effects from inhalation of high vapor concentrations may be chest and nasal irritation with coughing, sneezing, headache and even nausea.

#### **CHRONIC HEALTH EFFECTS**

■ There is some evidence that inhaling this product is more likely to cause a sensitization reaction in some persons compared to the general population.

There is limited evidence that, skin contact with this product is more likely to cause a sensitization reaction in some persons compared to the general population.

Respiratory sensitization may result in allergic/asthma like responses; from coughing and minor breathing difficulties to bronchitis with wheezing, gasping.

Sensitization may give severe responses to very low levels of exposure, i.e. hypersensitivity. Sensitized persons should not be allowed to work in situations where exposure may occur.

Section 3 - COMPOSITION / INFORMATION ON INGREDIENTS

NAME	CAS RN	%
benzyl methacrylate	2495-37-6	>98

## **Section 4 - FIRST AID MEASURES**

#### **SWALLOWED**

- -
- Immediately give a glass of water.
- First aid is not generally required. If in doubt, contact a Poisons Information Center or a doctor.

#### EYE

- If this product comes in contact with the eyes:
- · Wash out immediately with fresh running water.
- Ensure complete irrigation of the eye by keeping eyelids apart and away from eye and moving the eyelids by occasionally lifting the upper and lower lids.
- If pain persists or recurs seek medical attention.
- Removal of contact lenses after an eye injury should only be undertaken by skilled personnel.

#### SKIN

- If skin contact occurs:
- Immediately remove all contaminated clothing, including footwear
- Flush skin and hair with running water (and soap if available).
- Seek medical attention in event of irritation.

#### **INHALED**

- If fumes or combustion products are inhaled remove from contaminated area.
- Lay patient down. Keep warm and rested.
- Prostheses such as false teeth, which may block airway, should be removed, where possible, prior to initiating first aid procedures.
- Apply artificial respiration if not breathing, preferably with a demand valve resuscitator, bag-valve mask device, or pocket mask as trained. Perform CPR if necessary.
- Transport to hospital, or doctor, without delay.

#### **NOTES TO PHYSICIAN**

■ Treat symptomatically.

Section 5 - FIRE FIGHTING MEASURES				
Vapour Pressure (mmHG):	Negligible			
Upper Explosive Limit (%):	Not available			
Specific Gravity (water=1):	1.040			
Lower Explosive Limit (%):	Not available			

#### **EXTINGUISHING MEDIA**

- Foam.
- Dry chemical powder.
- BCF (where regulations permit).
- · Carbon dioxide.
- Water spray or fog Large fires only.

### **FIRE FIGHTING**

- Alert Emergency Responders and tell them location and nature of hazard.
- Wear full body protective clothing with breathing apparatus.
- Prevent, by any means available, spillage from entering drains or water course.
- Use water delivered as a fine spray to control fire and cool adjacent area.
- Avoid spraying water onto liquid pools.
- Do not approach containers suspected to be hot.
- Cool fire exposed containers with water spray from a protected location.
- If safe to do so, remove containers from path of fire.

#### GENERAL FIRE HAZARDS/HAZARDOUS COMBUSTIBLE PRODUCTS

- · Combustible.
- Slight fire hazard when exposed to heat or flame.
- Heating may cause expansion or decomposition leading to violent rupture of containers.
- On combustion, may emit toxic fumes of carbon monoxide (CO).
- May emit acrid smoke.
- Mists containing combustible materials may be explosive.

Combustion products include: carbon dioxide (CO2), nitrogen oxides (NOx), other pyrolysis products typical of burning organic material. May emit clouds of acrid smoke.

May emit poisonous fumes.

May emit corrosive fumes.

#### FIRE INCOMPATIBILITY

■ Avoid contamination with oxidizing agents i.e. nitrates, oxidizing acids,chlorine bleaches, pool chlorine etc. as ignition may result.

#### PERSONAL PROTECTION

Glasses:

Chemical goggles.

Gloves:

Respirator:

Type A-P Filter of sufficient capacity

## Section 6 - ACCIDENTAL RELEASE MEASURES

## MINOR SPILLS

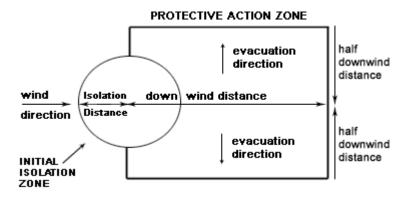
- Remove all ignition sources.

- · Clean up all spills immediately.
- Avoid breathing vapors and contact with skin and eyes.
- Control personal contact by using protective equipment.
- Contain and absorb spill with sand, earth, inert material or vermiculite.
- Wipe up.
- Place in a suitable labeled container for waste disposal.

#### **MAJOR SPILLS**

- Moderate hazard.
- Clear area of personnel and move upwind.
- Alert Emergency Responders and tell them location and nature of hazard.
- Wear breathing apparatus plus protective gloves.
- Prevent, by any means available, spillage from entering drains or water course.
- No smoking, naked lights or ignition sources. Increase ventilation.
- Stop leak if safe to do so.
- Contain spill with sand, earth or vermiculite.
- Collect recoverable product into labeled containers for recycling.
- Absorb remaining product with sand, earth or vermiculite.
- Collect solid residues and seal in labeled drums for disposal.
- Wash area and prevent runoff into drains.
- If contamination of drains or waterways occurs, advise emergency services.

#### PROTECTIVE ACTIONS FOR SPILL



From IERG (Canada/Australia)
Isolation Distance Downwind Protection Distance -

From US Emergency Response Guide 2000 Guide No guide found.

#### **FOOTNOTES**

1 PROTECTIVE ACTION ZONE is defined as the area in which people are at risk of harmful exposure. This zone assumes that random changes in wind direction confines the vapour plume to an area within 30 degrees on either side of the predominant wind direction, resulting in a crosswind protective action distance equal to the downwind protective action distance.

2 PROTECTIVE ACTIONS should be initiated to the extent possible, beginning with those closest to the spill and working away from the site in the downwind direction. Within the protective action zone a level of vapour concentration may exist resulting in nearly all unprotected persons becoming incapacitated and unable to take protective action and/or incurring serious or irreversible health effects.

3 INITIAL ISOLATION ZONE is determined as an area, including upwind of the incident, within which a high probability of localised wind reversal may expose nearly all persons without appropriate protection to life-threatening concentrations of the material.

4 SMALL SPILLS involve a leaking package of 200 litres (55 US gallons) or less, such as a drum (jerrican or box with inner containers). Larger packages leaking less than 200 litres and compressed gas leaking from a small cylinder are also considered "small spills". LARGE SPILLS involve many small leaking packages or a leaking package of greater than 200 litres, such as a cargo tank, portable tank or a "one-tonne" compressed gas cylinder.

5 Guide No guide found. is taken from the US DOT emergency response guide book.

6 IERG information is derived from CANUTEC - Transport Canada

#### ACUTE EXPOSURE GUIDELINE LEVELS (AEGL) (in ppm)

AEGL 1: The airborne concentration of a substance above which it is predicted that the general population, including susceptible individuals, could experience notable discomfort, irritation, or certain asymptomatic nonsensory effects. However, the effects are not disabling and are transient and reversible upon cessation of exposure.

AEGL 2: The airborne concentration of a substance above which it is predicted that the general population, including susceptible individuals, could experience irreversible or other serious, long-lasting adverse health effects or an impaired ability to escape.

AEGL 3: The airborne concentration of a substance above which it is predicted that the general population, including susceptible individuals, could experience life-threatening health effects or death.

#### Section 7 - HANDLING AND STORAGE

#### PROCEDURE FOR HANDLING

- Most acrylic monomers have low viscosity therefore pouring, material transfer and processing of these materials do not necessitate heating.
- Viscous monomers may require heating to facilitate handling. To facilitate product transfer from original containers, product must be heated to no more than 60 deg. C. (140 F.), for not more than 24 hours.
- Do NOT use localized heat sources such as band heaters to heat/ melt product.
- Do NOT use steam.
- Hot boxes or hot rooms are recommended for heating/ melting material. The hot box or hot room should be set a maximum temperature
  of 60 deg. C. (140 F.).
- Do NOT overheat this may compromise product quality and /or result in an uncontrolled hazardous polymerization.
- If product freezes, heat as indicated above and mix gently to redistribute the inhibitor. Product should be consumed in its entirety after heating/ melting; avoid multiple "reheats" which may affect product quality or result in product degradation.
- Product should be packaged with inhibitor(s). Unless inhibited, product may polymerize, raising temperature and pressure, possibly
  rupturing container. Check inhibitor level periodically, adding to bulk material if needed. In addition, the product's inhibitor(s) require the
  presence of dissolved oxygen. Maintain, at a minimum, the original headspace in the product container and do NOT blanket or mix with
  oxygen-free gas as it renders the inhibitor ineffective. Ensure air space (oxygen) is present during product heating / melting.
- Store product indoors at temperatures greater than the product's freeing point (or greater than 0 deg. C. (32 F).) if no freezing point available and below 38 deg. C (100 F.).
- Avoid prolonged storage (longer than shelf-life) storage temperatures above 38 deg. C (100 F.).
- Store in tightly closed containers in a properly vented storage area away from heat, sparks, open flame, strong oxidisers, radiation and other initiators.
- Prevent contamination by foreign materials.
- Prevent moisture contact.
- Use only non-sparking tools and limit storage time. Unless specified elsewhere, shelf-life is 6 months from receipt.
- Avoid all personal contact, including inhalation.
- Wear protective clothing when risk of exposure occurs.
- · Use in a well-ventilated area.
- Prevent concentration in hollows and sumps.
- DO NOT enter confined spaces until atmosphere has been checked.
- Avoid smoking, naked lights or ignition sources.
- Avoid contact with incompatible materials.
- When handling, DO NOT eat, drink or smoke.
- Keep containers securely sealed when not in use.
- Avoid physical damage to containers.
- Always wash hands with soap and water after handling.
- Work clothes should be laundered separately.
- Use good occupational work practice.
- Observe manufacturer's storing and handling recommendations.
- Atmosphere should be regularly checked against established exposure standards to ensure safe working conditions.
- DO NOT allow clothing wet with material to stay in contact with skin

## **RECOMMENDED STORAGE METHODS**

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- Metal can or drum
- Packing as recommended by manufacturer.
- Check all containers are clearly labeled and free from leaks.

## STORAGE REQUIREMENTS

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- Storage requires stabilizing inhibitor content and dissolved oxygen content to be monitored. Refer to manufacturer's recommended levels.
- DO NOT overfill containers so as to maintain free head space above product.
- Blanketing or sparging with nitrogen or oxygen free gas will deactivate stabilizer.
- Store in original containers.
- Keep containers securely sealed.
- No smoking, naked lights or ignition sources.
- Store in a cool, dry, well-ventilated area.
- Store away from incompatible materials and foodstuff containers.
- Protect containers against physical damage and check regularly for leaks.
- Observe manufacturer's storing and handling recommendations.

#### SAFE STORAGE WITH OTHER CLASSIFIED CHEMICALS



+ X + X X

- X: Must not be stored together
- O: May be stored together with specific preventions
- +: May be stored together

#### Section 8 - EXPOSURE CONTROLS / PERSONAL PROTECTION

#### **EXPOSURE CONTROLS**

The following materials had no OELs on our records

• benzyl methacrylate: CAS:2495-37-6

#### **MATERIAL DATA**

BENZYL METHACRYLATE:

■ No exposure limits set by NOHSC or ACGIH.

#### PERSONAL PROTECTION









Consult your EHS staff for recommendations

#### **EYE**

- .
- Safety glasses with side shields.
- Chemical goggles.
- Contact lenses pose a special hazard; soft lenses may absorb irritants and all lenses concentrate them. DO NOT wear contact lenses.

#### HANDS/FEET

- Suitability and durability of glove type is dependent on usage. Important factors in the selection of gloves include: such as:
- frequency and duration of contact,
- chemical resistance of glove material,
- glove thickness and
- dexterity

Select gloves tested to a relevant standard (e.g. Europe EN 374, US F739).

- When prolonged or frequently repeated contact may occur, a glove with a protection class of 5 or higher (breakthrough time greater than 240 minutes according to EN 374) is recommended.
- When only brief contact is expected, a glove with a protection class of 3 or higher (breakthrough time greater than 60 minutes according to EN 374) is recommended.
- Contaminated gloves should be replaced.

Gloves must only be worn on clean hands. After using gloves, hands should be washed and dried thoroughly. Application of a non-perfumed moisturiser is recommended.

Wear chemical protective gloves, eg. PVC.

Wear safety footwear or safety gumboots, eg. Rubber.

NOTE: The material may produce skin sensitization in predisposed individuals. Care must be taken, when removing gloves and other protective equipment, to avoid all possible skin contact.

#### **OTHER**

- Overalls.
- P.V.C. apron.
- Barrier cream.
- Skin cleansing cream.
- Eye wash unit.

#### RESPIRATOR

■ Selection of the Class and Type of respirator will depend upon the level of breathing zone contaminant and the chemical nature of the contaminant. Protection Factors (defined as the ratio of contaminant outside and inside the mask) may also be important.

Breathing Zone Level ppm (volume)	Maximum Protection Factor	Half-face Respirator	Full-Face Respirator
1000	10	A-1 P	-
1000	50	-	A-1 P
5000	50	Airline*	-
5000	100	-	A-2 P
10000	100	-	A-3 P
	100+		Airline* *

\* - Continuous Flow \*\* - Continuous-flow or positive pressure demand.

The local concentration of material, quantity and conditions of use determine the type of personal protective equipment required.

Use appropriate NIOSH-certified respirator based on informed professional judgement. In conditions where no reasonable estimate of exposure can be made, assume the exposure is in a concentration IDLH and use NIOSH-certified full face pressure demand SCBA with a minimum service life of 30 minutes, or a combination full facepiece pressure demand SAR with auxiliary self-contained air supply. Respirators provided only for escape from IDLH atmospheres shall be NIOSH-certified for escape from the atmosphere in which they will be used.

#### **ENGINEERING CONTROLS**

■ CARE: Use of a quantity of this material in confined space or poorly ventilated area, where rapid build up of concentrated atmosphere may occur, could require increased ventilation and/or protective gear.

General exhaust is adequate under normal operating conditions. Local exhaust ventilation may be required in special circumstances. If risk of overexposure exists, wear an approved respirator An approved respirator (supplied air type) may be required in special circumstances. Correct fit is essential to ensure adequate protection. Provide adequate ventilation in warehouses and enclosed storage areas.

Air contaminants generated in the workplace possess varying "escape" velocities which, in turn, determine the "capture velocities" of fresh circulating air required to effectively remove the contaminant.

,	
Type of Contaminant:	Air Speed:
solvent, vapors, degreasing etc., evaporating from tank (in still air).	0.25-0.5 m/s (50-100 f/min)
aerosols, fumes from pouring operations, intermittent container filling, low speed conveyer transfers, welding, spray drift, plating acid fumes, pickling (released at low velocity into zone of active generation)	0.5-1 m/s (100-200 f/min.)
direct spray, spray painting in shallow booths, drum filling, conveyer loading, crusher dusts, gas discharge (active generation into zone of rapid air motion)	1-2.5 m/s (200-500 f/min.)
grinding, abrasive blasting, tumbling, high speed wheel generated dusts (released at high initial velocity into zone of very high rapid air motion)	2.5-10 m/s (500-2000 f/min.)
Within each range the appropriate value depends on:	
Lower end of the range	Upper end of the range
1: Room air currents minimal or favorable to capture	1: Disturbing room air currents
2: Contaminants of low toxicity or of nuisance value only.	2: Contaminants of high toxicity
3: Intermittent, low production.	3: High production, heavy use
4: Large hood or large air mass in motion	4: Small hood-local control only

Simple theory shows that air velocity falls rapidly with distance away from the opening of a simple extraction pipe. Velocity generally decreases with the square of distance from the extraction point (in simple cases). Therefore the air speed at the extraction point should be adjusted, accordingly, after reference to distance from the contaminating source. The air velocity at the extraction fan, for example, should be a minimum of 1-2 m/s (200-400 f/min) for extraction of solvents generated in a tank 2 meters distant from the extraction point. Other mechanical considerations, producing performance deficits within the extraction apparatus, make it essential that theoretical air velocities are multiplied by factors of 10 or more when extraction systems are installed or used.

## Section 9 - PHYSICAL AND CHEMICAL PROPERTIES

## **PHYSICAL PROPERTIES**

Liquid

Does not mix with water.

Sinks in water

State	Liquid	Molecular Weight	176.21
Melting Range (°F)	Not available	Viscosity	Not Available
Boiling Range (°F)	203- 208.4 (4 mm Hg)	Solubility in water (g/L)	Immiscible
Flash Point (°F)	Not available	pH (1% solution)	Not applicable
Decomposition Temp (°F)	Not available	pH (as supplied)	Not applicable
Autoignition Temp (°F)	Not available	Vapour Pressure (mmHG)	Negligible
Upper Explosive Limit (%)	Not available	Specific Gravity (water=1)	1.040
Lower Explosive Limit (%)	Not available	Relative Vapor Density (air=1)	>1
Volatile Component (%vol)	Not available	Evaporation Rate	Not available

#### **APPEARANCE**

Colourless liquid; does not mix with water.

■ Ecotoxicity of acrylates is a function of n-octanol/ water partition coefficient (log Pow, log Kow). Compounds with a log Pow >5 exhibit simple narcosis, but at lower log Pow the toxicity of acrylates is greater than predicted for simple narcotics.

Material

#### **Section 10 - CHEMICAL STABILITY**

#### CONDITIONS CONTRIBUTING TO INSTABILITY

- Polymerisation may occur at elevated temperatures.
- Polymerisation may be accompanied by generation of heat as exotherm.
- Process is self accelerating as heating causes more rapid polymerisation.
- Exotherm may cause boiling with generation of acrid, toxic and flammable vapour.
- Polymerization and exotherm may be violent if contamination with strong acids, amines or catalysts occurs.
- Polymerization and exotherm of material in bulk may be uncontrollable and result in rupture of storage tanks.
- Polymerization may occur if stabilizing inhibitor becomes depleted by aging.
- Stabilizing inhibitor requires dissolved oxygen to be present in liquid for effective action.
- Specific storage requirements must be met for stability on ageing and transport.

#### STORAGE INCOMPATIBILITY

■ Contamination with polymerization catalysts - peroxides, persulfates, oxidizing agents - also strong acids, strong alkalies, will cause polymerization with exotherm - generation of heat.

Polymerization of large quantities may be violent - even explosive.

For incompatible materials - refer to Section 7 - Handling and Storage.

#### Section 11 - TOXICOLOGICAL INFORMATION

benzyl methacrylate

#### **TOXICITY AND IRRITATION**

■ unless otherwise specified data extracted from RTECS - Register of Toxic Effects of Chemical Substances.

TOXICITY IRRITATION

Oral (rat) LD50: 5000 mg/kg \*

Nil Reported \* Sigma/Aldrich

■ Asthma-like symptoms may continue for months or even years after exposure to the material ceases. This may be due to a non-allergenic condition known as reactive airways dysfunction syndrome (RADS) which can occur following exposure to high levels of highly irritating compound. Key criteria for the diagnosis of RADS include the absence of preceding respiratory disease, in a non-atopic individual, with abrupt onset of persistent asthma-like symptoms within minutes to hours of a documented exposure to the irritant. A reversible airflow pattern, on spirometry, with the presence of moderate to severe bronchial hyperreactivity on methacholine challenge testing and the lack of minimal lymphocytic inflammation, without eosinophilia, have also been included in the criteria for diagnosis of RADS. RADS (or asthma) following an irritating inhalation is an infrequent disorder with rates related to the concentration of and duration of exposure to the irritating substance. Industrial bronchitis, on the other hand, is a disorder that occurs as result of exposure due to high concentrations of irritating substance (often particulate in nature) and is completely reversible after exposure ceases. The disorder is characterised by dyspnea, cough and mucus production.

Based on the available oncogenicity data and without a better understanding of the carcinogenic mechanism the Health and Environmental Review Division (HERD), Office of Toxic Substances (OTS), of the US EPA previously concluded that all chemicals that contain the acrylate or methacrylate moiety (CH2=CHCOO or CH2=C(CH3)COO) should be considered to be a carcinogenic hazard unless shown otherwise by adequate testing.

This position has now been revised and acrylates and methacrylates are no longer de facto carcinogens.

## **Section 12 - ECOLOGICAL INFORMATION**

Refer to data for ingredients, which follows:

BENZYL METHACRYLATE:

- DO NOT discharge into sewer or waterways.
- Ecotoxicity of acrylates is a function of n-octanol/ water partition coefficient (log Pow, log Kow). Compounds with a log Pow >5 exhibit simple narcosis, but at lower log Pow the toxicity of acrylates is greater than predicted for simple narcotics.

**Ecotoxicity** 

Ingredient Persistence: Water/Soil Persistence: Air Bioaccumulation Mobility benzyl methacrylate LOW LOW MED

#### Section 13 - DISPOSAL CONSIDERATIONS

### **Disposal Instructions**

All waste must be handled in accordance with local, state and federal regulations.

- Recycle wherever possible or consult manufacturer for recycling options.
- Consult Waste Management Authority for disposal.
- Bury or incinerate residue at an approved site.
- Recycle containers if possible, or dispose of in an authorized landfill.

## **Section 14 - TRANSPORTATION INFORMATION**

NOT REGULATED FOR TRANSPORT OF DANGEROUS GOODS: DOT, IATA, IMDG

#### Section 15 - REGULATORY INFORMATION



#### **REGULATIONS**

benzyl methacrylate (CAS: 2495-37-6) is found on the following regulatory lists;

"Canada Domestic Substances List (DSL)","US Toxic Substances Control Act (TSCA) - Inventory"

#### **Section 16 - OTHER INFORMATION**

#### **LIMITED EVIDENCE**

- Possible respiratory and skin sensitizer\*.
- \* (limited evidence).

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- Classification of the mixture and its individual components has drawn on official and authoritative sources as well as independent review by the Chemwatch Classification committee using available literature references.

  A list of reference resources used to assist the committee may be found at: www.chemwatch.net/references.
- The (M)SDS is a Hazard Communication tool and should be used to assist in the Risk Assessment. Many factors determine whether the reported Hazards are Risks in the workplace or other settings. Risks may be determined by reference to Exposures Scenarios. Scale of use, frequency of use and current or available engineering controls must be considered.

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