

Dragon, Karen E. (CDC/NIOSH/EID)

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To: NIOSH Docket Office (CDC)
Cc: Chen, Jihong (Jane) (CDC/NIOSH/EID) (CTR)
Subject: 161-A - Occupational Exposure to Carbon Nanotubes and Nanofibers Comments

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Comments

I have a concern that the recommended NIOSH method 5040 for elemental carbon may not be the best choice in all situations. For example, we looked at using NIOSH 5040 for a workplace exposure assessment for the decommissioning of a CNT manufacturing pilot plant, but elected to go with a modified NIOSH 7500 XRD method for synthetic graphite because elemental carbon would have been ubiquitous in the petroleum refinery pilot plant environment for that project. The same may be true where propane powered lift trucks or other combustion processes are involved.