

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

From: Mark Ellis [markellis@ima-na.org]
Sent: Friday, April 16, 2010 12:58 PM
To: NIOSH Docket Office (CDC)
Cc: markellis@ima-na.org
Subject: 099-C Asbestos Fibers and Other Elongate Mineral Particles: State of the Science and Roadmap for Research Version 4
Attachments: IMA-NA Comments - Roadmap Version 4.pdf

NIOSH Docket Number 099-C.
NIOSH Mailstop: C-34
Robert A. Taft Lab.
4676 Columbia Parkway
Cincinnati, Ohio 45226

Dear Sir or Madam:

Please find attached the comments of the Industrial Minerals Association - North America (IMA-NA) on the draft document entitled, "Draft NIOSH CURRENT INTELLIGENCE BULLETIN - Asbestos Fibers and Other Elongate Mineral Particles: State of the Science and Roadmap for Research - Version 4."

Please let me know if you have any questions, comments or suggestions regarding this matter.

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April 15, 2010

NIOSH Docket Office
NIOSH Mailstop C-34
Robert A. Taft Lab
Mailstop C-34
4676 Columbia Parkway
Cincinnati, Ohio 45226

RE: NIOSH Current Intelligence Bulletin Asbestos Fibers and Other Elongate Mineral Particles: State of the Science and Roadmap for Research Version 4 January 2010

As requested by the National Institute for Occupational Safety and Health (NIOSH), the Allied Organizations ("Allies") are pleased to provide these comments on the above-captioned document.

NIOSH's roadmap should recommend research to provide clarity in several specific areas of concern where overwhelming consensus of science already points:

- Accurate definition of asbestiform minerals (and clearly identifying that non-asbestiform cleavage fragments are not the same).
- Current analytical methods and fiber definitions for asbestos were designed for settings where commercial asbestos is expected to be present; yet they are not useful for assessing and measuring asbestos in natural mixed-dust environments because they cannot distinguish between asbestos fibers and other fibers that are found frequently in the outdoor environment. In other words, by using current test methodologies, such as those described in the Roadmap, many non-asbestos rock fragments would be erroneously classified as asbestos.
- Research affirming health risk-based levels of tolerance is needed so that harmful exposure to definitive asbestos and asbestiform fibers is prevented. Zero is not a feasible result for a naturally-occurring substance that has been documented as being present in the ambient air and water.

We urge NIOSH to include as a research priority a comprehensive mineralogical, chemical and physical property examination of asbestos and other asbestiform fibers that have been reported in the scientific literature to cause human disease. These properties should point to an appropriate analytical process for measuring those fibers that are truly harmful.

The Allies are pleased to offer these comments and look forward to a constructive working relationship with NIOSH.

cc: Dr. John Howard, Director, National Institute for Occupational Safety and Health