

Miller, Diane M. (CDC/NIOSH/EID)

From:
Sent: Tuesday, May 29, 2007 2:45 PM
To: NIOSH Docket Office (CDC)
Cc: Doyle, Glenn (CDC/NIOSH/EID); Chen, Jihong (Jane) (CDC/NIOSH/EID) (CTR)
Subject: 099 - Roadmap Comments

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Comments

I would like to commend NIOSH for the document. The research proposed in this document will help both NIOSH and EPA to assess occupational and environmental health risks associated with asbestos fibers, respectively.

General Comment:

Improved sampling and analytical methods – It is unclear how the new sampling and analytical method will keep its continuity with historical health data collected from past epidemiological studies. For example, if the new method also incorporates a “fiber durability” factor, how would the results from historical PCM analysis used to estimate the risk of acquiring asbestos-related diseases?

Toxicity of fiber-like cleavage fragments – The evaluation of published information presented in support of conducting research on the toxicity of fiber-like cleavage fragments appear not well-justified.

Specific Comments:

1. Page 1, line 4 through 7 - It appears that fiber dimension research is done by only one researcher. Please provide chronological references that investigated the impact of asbestos fiber shape on health effects.
2. Page 3, line 12 through 15 – It is unclear why 8-yr average of the number of workers whose asbestos exposures were measured and reported was compared with that of 5-yr average.
3. Page 7, line 12 through 14 – What is the value of the residual risk?
4. Page line 14 and 15 – Please explain why a risk-free level not established?
5. Page 7, line 16 through 23 – One of the problems associated with PCM is that the method cannot differentiate asbestos from non-asbestos fibers, so non-asbestos fibers may be identified as asbestos fibers. It is unclear how the 2nd part of the definition was applied. Please explain.
6. Page 8, line 10 through 18 – Sullivan (2007) evaluated asbestos exposures associated with the Libby mines workers/residents. Although individuals were exposed to non-regulated asbestos fibers (i.e., winchite and richterite), the study did not quantify those exposures.
7. Pages 9 through 11 – The studies discussed in support of objective no. 3 do not support pursuing the research proposed for fiber-like cleavage fragments.

8. Section 1.2.1.3 – The literature data that dealt with the toxicity of amphibole versus chrysotile asbestos fibers should be included in this section.

9. Page 22, line 1 through 16 – It is not clear how or which PCM fiber characteristics will be used to identify asbestos from non-asbestos fibers.