

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

From: Lynne Woodside [lwoodside@ngkmetals.com]
Sent: Wednesday, May 07, 2008 8:54 AM
To: NIOSH Docket Office (CDC)
Subject: 120 - NIOSH Alert: Beryllium
Attachments: NIOSH ALERT COMMENTS 08.doc

Attached please find comments on the draft NIOSH Alert: Preventing Chronic Beryllium Disease and Beryllium Sensitization.

Sincerely,

Lynne Woodside
Manager Environment and Safety
NGK Metals Corporation
917 US Highway 11 South
Sweetwater, TN 37874
Tel 423.351.0435
Fax 423.351.0362
www.ngkmetals.com



NGK Metals Corporation

ISO 9002

917 State Highway 11 South Sweetwater, TN 37874 800 523-8268 Fax 877 645-2328

May 7, 2008

Christine R Schuler, PhD
Research Epidemiologist
CDC/NIOSH/DRDS/FSB
1095 Willowdale Rd, MS 280
Morgantown, WV 26505

Dear Ms. Schuler,

NGK Metals Corporation appreciates the opportunity to review the draft document entitled "NIOSH Alert: Preventing Chronic Beryllium Disease and Beryllium Sensitization," and provides the following comments.

Page iii

“WARNING! Workers exposed to particles, fumes, or solutions from beryllium-containing materials may develop chronic beryllium disease, a potentially disabling or even fatal disease.”

Replace the word solutions with *mist* to clarify that inhalation is necessary for the development of chronic beryllium disease.

Page iii

- “Keep beryllium-containing dusts and solutions off the skin...”

Although the text of the document explains that inhalation of beryllium is necessary for disease the posting does not include such a statement. The role skin contact plays in the development of beryllium sensitization is not defined and studies to date have not found that skin contact with insoluble forms of beryllium causes beryllium sensitization or disease. NGK does however maintain that keeping beryllium-containing dusts and solutions off the skin and clothes is prudent practice. The statement concerning company-issued clothes and showering at the end of the workshift would be more appropriate under the bullet discussing preventing beryllium dusts from leaving the work area.

Page iii

- “Participate in medical surveillance so that risks related to job tasks can be identified and prevented”

Insert the word *workplace* prior to medical surveillance.

Page iv

- “Keep airborne concentrations of beryllium as low as possible; since no safe exposure limit for beryllium is known.”

NGK fully supports the ALARA principle but is concerned that the statement no safe exposure limit for beryllium is known infers that exposure must be completely eliminated. Since beryllium is a naturally occurring element the public is exposed to low levels of beryllium and there are no reports of disease from such exposure. A statement to the effect that current exposure limits are under review may be less confusing.

Page iv

- “Identify and clean areas outside the beryllium work zone that may have been contaminated before these recommendations were implemented”

This statement is vague and may lead to confusion. A strong housekeeping program should be recommended for facilities that process or have processed beryllium containing products.

Page v

- “Conduct medical surveillance for sensitization using the beryllium lymphocyte proliferation test (BeLPT)...”

The use of the BeLPT should not be included in the bullet items as steps employers should take to protect workers. Reference to the test should be left in the text where its limitations can be thoroughly documented and its use left to the discretion of employers and medical providers.

Page 2

“A worker’s immune system determines whether he or she will develop health problems from working with beryllium”

Replace the word will with *may*.

Page 2

The discussion of the limitations of the BeLPT should be expanded to include the following;

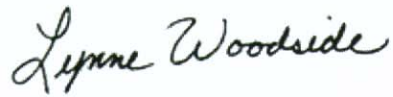
- There are no standardized methods for BeLPT testing.
- There is variability in results in both interlaboratory and intralaboratory testing.
- Individual’s results can vary over time.
- Studies have shown 1-2 percent of the non-occupationally exposed population test positive.

- Workers with abnormal results should repeat the BeLPT to confirm results prior to undergoing more invasive testing.

Page 8

The section titled Other Limits should only contain adopted limits.

Sincerely,

A handwritten signature in cursive script that reads "Lynne Woodside".

Lynne Woodside
Manager Environment and Safety
NGK Metals Corporation