

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

From: steven.jahn@srs.gov
Sent: Monday, May 12, 2008 2:46 PM
To: NIOSH Docket Office (CDC)
Subject: 120 - NIOSH Alert: Beryllium

Please receive these comments on the Draft NIOSH Alert on beryllium

1. No known exposure response level. While the goal of alerting workers and employers of the risk of disease is your mission, you must address the environmental background of beryllium. Only then can each company attempt to formulate its own risk management program with respect to other elements of your advisory: "higher risk" exposures; cleaning of areas; screening of "exposed" workers. If the wind blows the material into a facility, how far must it go to avoid "exposure"?

2. Screening of workers. Such a screening in the fashion of a BeLPT has high specificity (beryllium) but questionable sensitivity. No studies of the background incidence of sensitization, or health effects from sensitization without continuing occupational exposure, have been published that I am aware ofand therefore NIOSH best intentions with the alert will force employers to open their checkbook. While cost and implementability are not NIOSH pervue, without considering them you can expect the Alert to get no reaction (employers won't measure what amounts to a system of diagnosis that is asymptomatic, namely sensitization, until OSHA forces the issue).

3. Technical feasibility. There remains much evidence that accurate assessment of contamination levels and chemical species is elusive. I would recommend that some brief treatment of chemical analysis difficulties be included, with specific recommendations for treatment of spectral interference, detection limitations, and sampling and analysis error.

Respectfully,

Steven D. Jahn, CIH