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From: -Occupational-Exposure-to-Diacetyl-and-2
Sent: Friday, November 18, 2011 2:54 PM
To: NIOSH Docket Office (CDC)
Subject: 245 - Criteria for a Recommended Standard: Occupational Exposure to Diacetyl and 2,3-pentanedione Comments

Name
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Organization
a brewing company.

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Sacramento, CA

Comments

About two years ago a study group that included members of various safety organizations of government and several members of mostly food industries such as bakeries, cheese-makers, snack food producers including popcorn, and breweries addressed the concern of diacetyl, which in high concentrations, had been found to produce "popcorn lung" in exposed workers. The industries represented were among those who use diacetyl in their products or produce it due to their various processes. After six months it was determined that breweries would not be a target industry because the diacetyl concentrations obtained within their process were too low to cause concern: that is parts per billion instead of the dangerous, parts per million.

Now NIOSH has proposed an action level for the food industries of 5 parts per billion diacetyl at which point safety breathing apparatus must be used by those exposed to those levels for most of their work shift. What this means to the pub brewer and to any bar that serves beer and whiskey products is that workers will have to wear SCUBA gear. This is alarming.

I move that the proposed regulation be shelved until there is a thorough discussion by all stakeholders of all ramifications including economic impact and consumer responsibilities and liabilities.