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From: Breysse, Patrick [pbreysse@jhsph.edu]
Sent: Friday, April 11, 2008 11:27 AM
To: NIOSH Docket Office (CDC)
Subject: 120 - NIOSH Alert: Beryllium

My comments are in reference to docket number NIOSH-120:

1. I am very supportive of worker prevention steps outlined in this document. The recommendations for employers to protect workers are thoughtful and sufficiently protective.

2. While I agree with the document that a safe exposure limit for beryllium is not known, the literature suggests that the threshold for health effects is below 0.2 ug/m^3 . Madl et al (2007) document a number of cases of both Be sensitization (BeS) and chronic beryllium disease (CBD) in workers with airborne exposures that were below 0.2 ug/m^3 . Kelleher et al. (2001) reported the eight of the 20 (40%) of the cases (i.e., workers with BeS or CBD in Be machining facility) had individual life-time weighted (LTW) exposures $<0.2 \text{ ug/m}^3$. Taiwo et al. (2008) investigated identified two workers with CBD whose mean beryllium exposure were 0.16 and 0.04 ug/m^3 , respectively. The document should make the point that the exposure threshold is for protection against BeS, and/or CBD is below 0.2 ug/m^3 .

3. The document should also indicate that the exposure assessment to Be should be evaluated using "inhalable dust" measurements since BeS can be initiated by deposition of particles anywhere in the respiratory tract.

References

Madl AK, et al. (2007) J. Occup. Environ. Med. 4(6):448-466.

Kelleher PC, et al. (2001) J. Occup. Environ. Med. 43(3):238-249.

Taiwo OA, et al. (2008) J. Occup. Environ. Med. 50(2):157-162.

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