

**Dragon, Karen E. (CDC/NIOSH/EID)**

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**From:** Kelse, John [JKELSE@rtvanderbilt.com]  
**Sent:** Monday, August 29, 2011 9:59 AM  
**To:** NIOSH Docket Office (CDC)  
**Subject:** Docket # NIOSH-240 Submission

The NIOSH effort to improve its carcinogens list is a laudable effort. Among other potential benefits, it offers an opportunity to improve clarification with regard to what substances the Institute lists. The entry “tremolite silicates”, for example, is perhaps the most ambiguous substance presently listed.

This entry is likely linked to Libby amphibole (asbestiform winchite and richterite – previously viewed as asbestiform tremolite). The entry is unlikely to mean tremolite asbestos (tremolite in the asbestiform habit) because asbestos is separately listed. One would expect to see anthophyllite and actinolite silicates also listed if this were the intent. All amphibole minerals, of course, are silicates.

It is also unclear if the entry is supposed to include common nonasbestiform tremolite as a carcinogen. Knowing NIOSH's controversial position in this regard, the intent of this entry in this instance is also not made clear. In effect, the entry has no substance specific meaning.

Beyond a discussion of what NIOSH should or should not list is the core issue of specificity. Though typically not a problem with chemical substances, at times it is a problem with mineral nomenclature. More recently, NIOSH has itself recognized this long standing problem in its Roadmap initiative.

The entry should either be deleted or its intent correctly listed. If the entry is to address so called Libby amphibole, it could more accurately be listed as asbestiform winchite and asbestiform richterite. If it is intended to include elongate tremolite cleavage fragments then NIOSH should say so – and add other nonasbestiform amphiboles to this list as well. Many would argue vigorously with regard to nonasbestiform amphibole that such an entry is in no way risk supported, but at least we would know what substance(s) the entry is meant to mean.

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