

**NIOSH Public Meeting  
550 C Street S.W.  
Washington, D.C.  
May 4, 2007**

**Reference – Docket Number NIOSH-099**

**Comments on Draft Document, “Asbestos and Other Mineral Fibers: A Roadmap for Scientific Research”**

**Mr. Chairman, Dr. Howard, Members of the NIOSH Mineral Fibers Work Group, Ladies and Gentlemen,**

My name is Gary Fore. I am Vice President, Environment, Health and Safety for the National Asphalt Pavement Association (NAPA). Today, I am appearing on behalf of our more than 1,100 members. NAPA is the national association exclusively representing the Hot Mix Asphalt Producer and Paving Contractors in the U.S. It is estimated that there are least 300,000 workers employed in the plant and paving operations associated with Hot Mix Asphalt operations excluding the mineral aggregate supply industry in the U.S.

Our comments today will be brief as they are strategically directed at answering your questions 2-5 regarding the appropriateness and relevance of research needs identified in the Roadmap. In doing so, we will also emphasize the importance of the proposed scientific research to our industry, to our workers in the Hot Mix Asphalt Industry, and the affiliated mineral aggregate industry.

We applaud NIOSH for your efforts to create a roadmap for scientific research relating to asbestos mineral fiber and other mineral fibers, including naturally occurring minerals. Anytime there are questions relating to worker health and safety it becomes a serious matter and we take it as such. Your efforts are also important to the vitality of our industry for the following reasons. Approximately 94% of the 2.3 million miles of paved roads in the U.S. are paved with asphalt. Naturally occurring mineral aggregates make up approximately 95% of this Hot Mix Asphalt. High quality mineral aggregates needed for highway and street construction are today in short supply in various regions of the country. The transportation infrastructure in the U.S. depends upon a steady supply of these naturally occurring mineral aggregates. Not surprising, many of our member asphalt companies are general contractors in integrated companies that are engaged in all phases of highway and street construction including mineral aggregate production, earth moving, bridge building, as well as Hot Mix Asphalt operations. Most important, thousands of workers are involved in the Hot Mix Asphalt and affiliated aggregate industries. Worker health and safety is foremost in our minds and plans. Also, from an environmental perspective, our member companies and their employees are an integral part of the various communities and people environments across the U.S.

There is a parallel between the asbestiform mineral situation and the asphalt situation involving health uncertainties and unanswered questions. For many years NAPA and our member companies have worked in partnership with NIOSH, the Laborers' International Union of North America, the International Union of Operating Engineers, the Federal Highway Administration, OSHA, and others in the proactive pursuit of worker health and safety. This partnership stands on a track record of accomplishment and success. Examples include Engineering Controls on Paving Machines to minimize worker exposure to fume, the Alliance for Roadway Work Zone Safety to reduce fatalities and injuries in work zones, and the current Silica/Asphalt Milling Machine Partnership to evaluate and deal with potential exposures surrounding asphalt milling operations. As I look around the room, I see numerous familiar faces that are the foundation of these highly productive government, labor, industry partnership efforts. We believe this kind of forum, involving key stakeholders represents a model for pursuit of worker health and safety research needs.

We have thoroughly reviewed the NIOSH proposed Scientific Research Roadmap. As you have identified, the Roadmap represents a significant research undertaking in terms of scope. Our specific comments are strategic in nature and are consistent with the Roadmap. We are quick to add that we will leave the question 1 discussions relating to hazard identification and current understanding of the science to those more qualified. The intent of NAPA's comments is to help focus the priorities and scope of proposed research from the perspective of the Hot Mix Asphalt Industry.

- The fibers of concern need to be defined based upon sound, evidence based, and health effects science in relation to the chemical and physical chemistry properties.
- There needs to be developed practical, reliable sampling and analytical methods to measure asbestos in a mixed, naturally occurring mineral environment.
- Legislative or regulatory recommendations developed from such research activities should be based upon an understanding of the specific exposure situations along with a cognizance of the best, most current and evidence based science available.

Thank you for the opportunity to provide our views to NIOSH on this important research undertaking. We will be pleased to assist you as this research program develops.