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Sent: Thursday, February 17, 2011 8:12 PM
To: NIOSH Docket Office (CDC)
Cc: Chen, Jihong (Jane) (CDC/NIOSH/EID) (CTR)
Subject: 161-A - Occupational Exposure to Carbon Nanotubes and Nanofibers Comments

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Comments
Statement on NIOSH Recommended Exposure Limit (REL) to CNT/CNF

We(NBCI) were the Party established by Nano technology relative companies and Institutes in Japan.

We'd like to send our comment below regarding the title.

1)NIOSH prefers not to use expressions that imply CNT is harmful.

No scientific evidence exists that would indicate CNTs are harmful. The reports by Poland et al. (2008) and Takagi et al. (2008) point out the possibility that CNTs may cause acute mesothelial inflammation or induce mesothelioma similar to asbestos exposure. The studies were, however, conducted by administering MWCNTs into the abdominal cavity, which is absolutely impossible as a path for human exposure. Therefore, the studies by Poland and Takagi should be regarded as simply reference information on the potential risk of mesothelioma. None of the past studies on MWCNT inhalation exposure and intratracheal injection tests have reported even a single case of mesothelioma induced by administered MWCNTs.

2)Expressions that limit the use of CNTs are harmful.

The radical expression is detrimental to CNT-based product applications and technological developments expected to help alleviate global environmental problems. Such product applications and technological developments include reductions in other hazardous substance emissions, improvements in energy efficiency, and reductions in product weight.

For all of above reasons, we request the deletion of the sentence "When possible, substitute a nonhazardous or less hazardous material for CNT and CNF when feasible" in the third item of Section 1. Recommendation for Employers.