

Miller, Diane M. (CDC/NIOSH/EID)

From: Hobbs, John [hobbsjr@pgdp.usec.com]

Sent: Thursday, April 10, 2008 11:40 AM

To: NIOSH Docket Office (CDC)

Subject: 120 - NIOSH Alert: Beryllium

Following are comments on the Draft NIOSH Alert – Preventing Chronic Beryllium Disease and Beryllium Sensitization.

Please feel free to contact me if you have any questions regarding these comments.

John Hobbs
(270) 441-6603

Text:

Material Safety Data Sheets (MSDSs) provide information about the beryllium content of products that contain more than 0.1% beryllium. At lower concentrations, employers and workers may not be aware of the presence of beryllium; but health risks exist if the beryllium-containing material is dispersed as a dust, fume, or beryllium-containing solution that can be inhaled or come into contact with un-protected skin.

Comment:

This guidance suggests a need for beryllium exposure assessments of activities that result in the dispersion of any dust, fume or solution. If this is not NIOSH's intent, additional guidance or clarification is needed for the assessment of health risks from material containing 0.1% or less beryllium.

Text:

[Employers] Conduct medical surveillance for sensitization using the beryllium lymphocyte proliferation test (BeLPT) for workers who come into contact with beryllium dusts, fumes, and beryllium-containing solutions and suspensions.

Comment:

Coupled with the statement that health risks exist from the dispersion of dust, fume, or beryllium-containing solutions containing 0.1% or less beryllium, this guidance suggests a need to conduct medical surveillance for workers who come into contact with any dust, fume or solution. If this is not NIOSH's intent, additional guidance or clarification is needed regarding the criteria for inclusion in a medical surveillance program.