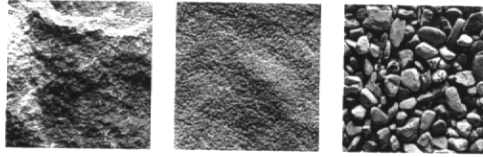


NATIONAL STONE, SAND & GRAVEL ASSOCIATION



Natural building blocks for quality of life

04-23-10A09:15 RCVD

April 19, 2010

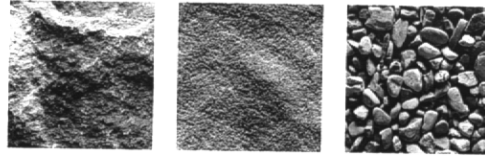
NIOSH Docket
NIOSH Mail Stop C-34
Robert A. Taft Lab
4676 Columbia Parkway
Cincinnati, Ohio 45226

We have discovered a typographical error in the transmittal letter submitted to docket NIOSH 099-C by the National Stone Sand & Gravel Association on Friday April 16, 2010. Please substitute the enclosed transmittal letter for the transmittal letter submitted earlier and discard the earlier letter.

Thank you,

Handwritten signature of William C. Ford.

William C. Ford



Natural building blocks for quality of life

April 16, 2010

NIOSH Docket Office
NIOSH Mailstop C-34
Robert A. Taft Lab
Mailstop C-34
4676 Columbia Parkway
Cincinnati, Ohio 45226

RE: NIOSH Current Intelligence Bulletin Asbestos Fibers and Other Elongate Mineral Particles: State of the Science and Roadmap for Research Version 4 January 2010

As requested by the National Institute for Occupational Safety and Health (NIOSH), the National Stone, Sand and Gravel Association (NSSGA) is pleased to provide these comments on the above captioned document.

NSSGA, based near the nation's capitol, is the world's largest mining association by product volume. Its member companies represent more than 90 percent of the crushed stone and 70 percent of the sand and gravel produced annually in the U.S. and approximately 120,000 working men and women in the aggregates industry. The vast majority of the products from our industry are utilized in public infrastructure products.

The NSSGA has a long history of working cooperatively with NIOSH on many occupational health issues. NSSGA has participated in the development of scientific research of this issue for over 25 years, and will continue to be an active participant in research on the health effects of minerals, mineral fibers and mineral particles.

Please see the enclosed document *NSSGA Comments on the NIOSH Current Intelligence Bulletin Asbestos Fibers and Other Elongate Mineral Particles: State of the Science and Roadmap for Research Version 4 April 2010* for NSSGA's specific comments on the *Roadmap*.

In addition, NSSGA has included, to be added to the docket, several papers which have bearing on this important issue and are referred to in the attached comments.

NSSGA was pleased to note that NIOSH supports the development of a national reference repository of minerals and information system to house samples of asbestos and related minerals. We suggest that it would be helpful if a method could be found to encourage authors of scientific research papers to submit samples of the minerals referenced in their work to the national repository to enable future researchers to study and replicate their work.

NSSGA is pleased to offer these comments and looks forward to continuing its constructive working relationship with NIOSH.

Sincerely,

A handwritten signature in black ink, appearing to read "William C. Ford".

William C. Ford, PE

Attachments

Attachments

1. *NSSGA Comments on the NIOSH Current Intelligence Bulletin Asbestos Fibers and Other Elongate Mineral Particles: State of the Science and Roadmap for Research Version 4, April, 2010*
2. *Distinguishing Mineralogical and Analytical Properties of Asbestiform and Nonasbestiform Habits of the Same Minerals - Table*
3. *The Geology of Asbestos in the United States and Its Practical Applications*, Bradley S. Van Gosen, Environmental & Engineering Geoscience, February, 2007
4. *Pleural Plaques: A Review of Diagnostic Issues and Possible Nonasbestos Factors*, Chester C. Clarke, Fiona S. Mowat, Michael Kelsh, and Mark A. Roberts, Archives of Environmental & Occupational health, Vol, 61, No. 4, 2006
5. *A Procedure for Quantitative Description of Fibrosity in Amphibole Minerals*, Eric J. Chatfield, ASTM Michael E. Beard Asbestos conference, January 28 - 29, San Antonio, Texas
6. *Aerosols in the Mining and Industrial Work Environments, Volume 2, Characterization* Edited by Virgil A. Marple and Benjamin Y. JH. Liu, Ann Arbor Science 1983
7. *Extinction Characteristics of Six Tremolites with Differing Morphologies* Matthew S. Sanchez, Richard J. Lee, and Drew Van Orden, Microscope, Vol. 56
8. *Characterizing and Discriminating the Shape of Asbestos Particles*, JH. G. Siegrist, Jr. and A. G Wylie, Environmental Research 23, 348 - 361, 1980
9. *The Importance of Width in Asbestos Fiber Carcinogenicity and Its Implications of Public Policy*, A.G. Wylie, K.F. Bailey, J.W. Kelse, and R.J. Lee, American Industrial Hygiene Association, May 1993
10. *Width Distributions of Asbestos and Non-Asbestos Amphibole Minerals* D.R. Van Orden, R. J. Lee, K.A. Allison, and J. Addison, Indoor and Built Environment, 2009; 0000;000:1-10:1 2008
11. *Relationship between the growth habit of asbestos and the dimensions of asbestos fibers*, A.G. Wylie, Mining Engineering, November, 1988
12. *Fiber Length and Aspect Ratio of Some Selected Asbestos Samples*, Ann G. Wylie, Health Hazards of Asbestos Exposure, Annuals of the New York Academy of Sciences, Vol. 330, New York, 1979