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

From: arin.assero@gmail.com on behalf of Arin Assero <aassero@myeloma.org>
Sent: Thursday, February 09, 2012 11:50 AM
To: NIOSH Docket Office (CDC)
Cc: jleib@dc-crd.com; Johanna Gray; Meghan Buzby
Subject: Docket Number NIOSH-248 - World Trade Center Health Program Scientific/Technical Advisory Committee
Attachments: WTC Advisory Committee Comments Feb 2012-IMF.pdf

To Whom it May Concern,

On behalf of the International Myeloma Foundation, attached are comments for **Docket Number NIOSH - 248**, The World Trade Center Health Program Scientific/Technical Advisory Committee. Should you have any questions or need more information, please contact me directly via email or at the IMF office at 818-487-7455.

Thank You,

Arin Assero
Director of Advocacy
International Myeloma Foundation
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February 9, 2012

NIOSH Docket Office
Robert A. Taft Laboratories
MS-C-34
4676 Columbia Parkway
Cincinnati, Ohio 45226
Delivered electronically to nioshdocket@cdc.gov
Re: World Trade Center Health Program Scientific/Technical Advisory Committee meeting

Dear committee members:

On behalf of the International Myeloma Foundation (IMF), the oldest and largest myeloma foundation dedicated to improving the quality of life of myeloma patients while working toward prevention and a cure, we are writing to submit comments regarding your meeting scheduled for February 16, 2012 to discuss the petition to add cancer to the list of World Trade Center (WTC) related health conditions. The IMF strongly supports the addition of cancer to this list of conditions resulting from the September 11, 2001 terrorist attacks.

Myeloma Background

Myeloma is a cancer in the bone marrow affecting production of normal blood cells and characterized by bone destruction with pain and disability. It is also called "multiple myeloma" because multiple areas of bone marrow may be involved. Myeloma is the second most common blood cancer after lymphomas. Each year, approximately 20,000 Americans are diagnosed with myeloma and 10,000 lose their battle with this disease. At any one time there are over 100,000 myeloma patients undergoing treatment for their disease in the U.S. Although the incidence of many cancers is decreasing, the number of myeloma cases is on the rise. There is no cure for myeloma, remissions are not always permanent, and additional treatment options are essential.

Research on Environmental Exposure and Myeloma

The 2009 President's Cancer Panel Report suggests that much of the increase in cancer incidence is being caused by environmental toxins. IMF research demonstrates a link between myeloma and toxins in the environment including dioxins, chemical contaminants produced by combustion.[1] Research into the risks associated with developing cancer, including myeloma, dates back to a 1990 study published in the American Journal of Epidemiology.[2]

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[1] The International Myeloma Foundation Issues Prevention and Treatment Guidelines for Firefighters for High-

[2] Howe GR, Burch JD. Fire fighters and risk of cancer: an assessment and overview of the epidemiologic evidence. *American Journal of Epidemiology*. 1990: 132: 1039-1050.

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While it is clear that a number of health problems have already arisen from this exposure, there are a number of important unanswered questions about cancers especially myeloma developing in 9/11 responders as a result of their exposure associated with the World Trade Center (WTC) clean-up efforts. A recently published study in The Journal of Occupational and Environmental Medicine, suggests a link between blood cancers like myeloma and exposure to the toxic dust at the WTC clean-up site. The heaviest exposures to airborne pollutants and carcinogens including asbestos, benzene, dioxins, and others occurred in the first days after the attacks. The 9/11 responders engulfed in the dust cloud that day sustained the most extreme exposures.[3] A number of previous studies on myeloma have associated exposure to benzene, pesticides, metals, and other known carcinogens to increased rates of myeloma.

A recent study found eight confirmed cases of myeloma that have arisen in WTC responders since the September 11, 2001 terrorist attacks. At the time this study was published, the authors were in the process of verifying an additional eight cases of myeloma in WTC responders. According to the study's author, Dr. Jacqueline Moline, four of the eight confirmed cases occurred in responders younger than 45 years old, which is even more concerning since myeloma is historically found in the elderly population. Three of the four arrived at the WTC on September 11, the day of heaviest exposure.[4]

According to the study, it would be prudent for physicians caring for WTC responders to be aware of emerging disease trends including myeloma in this population. Based on this recommendation and previous studies documenting the link between environmental exposures and myeloma, the IMF recommends that cancer, including myeloma, be added to the list of WTC health conditions that will be studied and monitored.

Thank you for your consideration of our comments and based on the research suggesting a link between exposures at the WTC site and myeloma, we hope that you will add cancer to the list of covered WTC-related health conditions. Please do not hesitate to contact us if we may be of assistance or you would like additional information.

Sincerely,

Brian G.M. Durie, MD
Cedars-Sinai Samuel Oschin Cancer Center
Chairman-IMF Board of Directors

Sundar Jagannath, MD
The Mt Sinai Cancer Institute, NY
IMF Scientific Advisory Board

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[3] Moline JM, Herbert R, Crowley L, Troy K, Hodgman E, Shukla G, Udasin I, Luft B, Wallenstein S, Landrigan P, Savitz D. Multiple Myeloma in World Trade Center Responders: A Case Series. *Journal of Occupational and Environmental Medicine*, 2009:51; 896-902.

[4] Moline et al.

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