



**FACSIMILE TRANSMITTAL**

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**Subject:** NIOSH Docket Number NIOSH-099

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Attached are the U.S. Chamber of Commerce's comments to the draft document titled "Asbestos and Other Fibers: A Roadmap for Scientific Research. If you have any difficulty with this transmission, please contact Tom Myers, Counsel, at 202-463-5804. Thank you.

rec'd  
5/3/07

CHAMBER OF COMMERCE  
OF THE  
UNITED STATES OF AMERICA

WILLIAM L. KOVACS  
VICE PRESIDENT  
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May 3, 2007

Diane Miller  
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4676 Columbia Parkway, M/S C-34  
Cincinnati, OH 45226

**Re: NIOSH-099: Comments to Draft Document Titled "Asbestos and  
Other Mineral Fibers: A Roadmap for Scientific Research"**

Dear Ms. Miller:

The U.S. Chamber of Commerce, the world's largest business federation representing more than three million businesses and organizations of every size, sector, and region, is pleased to submit these comments to the National Institute for Occupational Health and Safety's (NIOSH) draft document titled "Asbestos and Other Mineral Fibers: A Roadmap for Scientific Research" (Roadmap).

Chamber members are engaged in a wide range of activities, from road construction, home building, mining, and crushed stone, sand, and gravel production, and therefore stand to be substantially impacted by regulation in this area. The Chamber strongly supports regulations that protect human health and worker safety. However, the Chamber is also committed to ensuring that regulations are based on the best possible science and meet information quality and peer-review guidelines. The Chamber is concerned that the current methodologies applied to identify and assess health risks of asbestos in the natural environment do not meet these standards.

Current analytical methods and fiber definitions for asbestos were designed for settings where commercial asbestos is expected to be present; yet they are not useful for assessing and measuring asbestos in natural mixed-dust environments because they cannot distinguish between asbestos fibers and other fibers that are found frequently in the outdoor environment. In other words, by using current test methodologies, such as those described in the Roadmap, many non-asbestos rock fragments are being erroneously classified as asbestos.

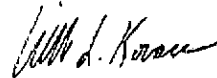
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Any regulation addressing asbestos must have definitions and test methods based on peer-reviewed science, and be both accurate and specific enough to measure regulated asbestos minerals while excluding other fibers and minerals. As such, the Chamber believes it is crucial to obtain a thorough scientific review of whether the current particle counting procedure, which was developed decades ago to assess health risks in settings where asbestos was being commercially processed, is scientifically valid for use in mixed dust, natural environment settings.

Based on the foregoing, the Chamber urges NIOSH to revise its draft Roadmap to ensure that good data forms the basis of any policy or standards concerning the identification and measurement of asbestos in the natural environment.

Respectfully,



William L. Kovacs

Cc: Dr. John Howard, NIOSH Director