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

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To: NIOSH Docket Office (CDC)
Cc: Chen, Jihong (Jane) (CDC/NIOSH/EID) (CTR)
Subject: 099-C - Asbestos Fibers and Other Elongate Mineral Particles: State of the Science and Roadmap for Research Version 4 Comments

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Comments
There is a general sense of being apologetic of use of asbestos in amny industrial settings. It ignores many important older pieces of peer reviewed literature-eg. Wagner's 1974 inhilation studies that are still relevant.Also how UICC reference materials were made. Specif comments-p2,lines 18-20 Implies there is a safe level of asbestos when there is none-not a viable concept.P8,line40-41-should call for development of knowledge bases for importation figues.p9,line 7-really VERY limited exceptions, not just limited-Very limited. p11.lines 35-36-can do surveillane.p13-top-if SEER data only covers 15% of population not really relevant and should not be quoted.p14,lines 19-32-whole paragraph very badly done. non-malignant disease includes plaques(line25)issue of finding ab bodies too vague-all people have them, it is the number.Dx needs only proper hx of exposure and prioper change on x-ray with no other cause.These are too many criteria.p15,line 33-hx of exposure alone sufficent-see editiorial Am Rev Resp Dx.p16,lines 1-2, need to note that chrysotile,compared to amphibols much less frequently make asbestos bodies.lines 13-14 -see comment above about implied safe level.p17,lines 33-34-while a few do not beleive chrysotile does not cauase mesothelioma most do, as well as IARC,WHO etc. and this line therefore inappropriate as written.p18,lines27-30--amphibole hypothesis debunked-see Stayner and Frank,Dodson and Williams(1998)-UICC B is asbestos free and causes meso.p19,lines 11-12-see Wagner 1974-chrysotile and Croccidolite equally caused meso.Hodgson and Darnton discredited by so much literature and should not even be quoted.p24,lines 1-22---this paragraph does not really reflect true situation and Gamble citation inapproprite given his being tossed out by NIOSH for fronting for industry.Same for p25,lines 18-31--deserves NO ROLE.As for facts, even if true, the exposure is additive and contributes to disease.p30,lines 17-38-even if unclear an additive risk.In general there is too much of an excuse made forRTV-NIOSH said asbestos there-then it is additive and harmful.Other points-need a clear definition of "asbestosis"-which should include pleural changes as was recognized for many years, especially
1867-1938 (Zenker and then Lanza).EMP is not so much eqivocal as mostly unstudied. Role of taconite, Libby etc needs more work.Overall the draft needs to be written to be more protective of workers and others and less apologetic.