

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

From: jmorawetz@icwuc.org
Sent: Tuesday, February 15, 2011 4:05 PM
To: NIOSH Docket Office (CDC)
Cc: Frank Cyphers; Kim Schmidt; Darrell Hornback; Bill Kojola; Greg Villanova
Subject: ICWUC comments on the NIOSH CIB on nano materials
Attachments: ICWUC comments Nano CIB.pdf

Enclosed are the ICWUC comments on the draft NIOSH CIB on Nanofibers and Nanotubes.

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February 15, 2011

NIOSH Docket Office
Robert Taft Laboratories, MS C-34
4676 Columbia Parkway
Cincinnati, Ohio 45226

Docket number NIOSH-161A CIB on Nanotubes and nanofibers

We welcome this document as an excellent step in controlling a new occupational hazard where there is substantial evidence of harm well before workers suffer disease and death. It well documents the significant cause for concern and proposes clear actions to control exposure and track exposed workers.

The ICWU represents workers at a number of carbon black facilities, a nano material in significant production in a variety of industries. This represents a significant occupational population that this document is of interest to. Although this document is specifically limited to nanofibers and nanotubes, we are troubled that given these particles similar size although different shapes, this is not addressed further. We support NIOSH in issuing a CIB with the focus on CNT and CNF but a section should be added that at a minimum recommends that employers would be prudent to follow the same recommendations and controls. In addition, there is a clear need for additional research to document the similar or different toxicity of carbon black, CNT and CNF.

There are, however, a few areas where we believe the document can be strengthened. The section on worker participation and training should be separate sections, not within section 1.1 Medical Screening and Surveillance. In particular, worker participation is vital throughout the implementation of any control plan and should be included in exposure assessment, engineering controls, work practices, clean-up and disposal, personal protective clothing and respirators. Although these areas are primarily the obligations and duty of site management, the input of workers exposed to CNT and CNF can be invaluable in understanding actual workplace exposures and practices and assist in accomplishing the goals of this CIB.

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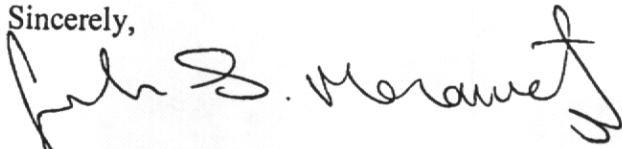
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The training section needs to be expanded to describe the frequency of training, reference CNT and CNF as covered by the Hazard Communication standard, 1910.1200 and should explicitly require training in all subjects mentioned in the CIB. It should clearly state the advantage of worker involvement in the design of curriculum, implementation and evaluation of training. There needs to be a specific section on the labeling on nano materials, an omission in the current document.

Again, we complement NIOSH in compiling the growing animal evidence of this new hazard and drafting the CIB before workers suffer the consequences of exposure.

Sincerely,

A handwritten signature in cursive script, appearing to read "John S. Morawetz". The signature is written in dark ink and is positioned above the typed name.

John S. Morawetz

c: Frank Cyphers
Greg Villanova
Darrell Hornback
Bill Kojola, AFL-CIO