

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

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**From:** firstpiggy@yahoo.ca  
**Sent:** Saturday, December 18, 2010 8:39 PM  
**To:** NIOSH Docket Office (CDC)  
**Cc:** Chen, Jihong (Jane) (CDC/NIOSH/EID) (CTR)  
**Subject:** 161-A - Occupational Exposure to Carbon Nanotubes and Nanofibers Comments

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**Comments**

Madam/Sir

Excellent document! I agree with with the recommendations except for 7ug/m3.  
Exposure limits should be set at 0. History has demonstrated that this is the only acceptable way of protecting workers and their families.

Also the recommendations appear to be aimed at production workers [those that manufacture] however there are thousands of other workers that could be exposed to CNTs through added value manufacturing, repair and recovery and disposal. Education of the work force is then necessary to prevent unintended exposure.

The next question to be asked is what effect/affect will CNTs have on the consumer? History tells us that consumers were adversely affected by asbestos. Today's knowledge and experience lays open the possibility of legal claims on manufactures and governments and everyone involved in setting exposure limits. Just because 7ug/m3 is the lowest detectable amount does not justify that being the recommended exposure level. This document recognizes that damage does occur at that exposure level but workers are expected to survive past their expected work life. How healthy will they be after retirement? How will their health impact their family?

History also demonstrated that 0 exposure led manufactures to a higher efficiency and thus a higher profit when they reduced their employees exposure to PVC to 0!  
Easy, readily attainable, lowest detectable are escape and excuse words that should never be used when discussing worker or even consumer health.