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

From: DanMcKeel
Sent: Saturday, November 10, 2012 9:16 AM
To: NIOSH Docket Office (CDC)
Cc: danmckee
Subject: Fwd: McKeel Comment on Allen Nov 2012 GSI Discussion Paper
Attachments: McKeel Comment on Allen Nov 2012 GSI Discussion Paper

To the NIOSH Docket Office:

Attachment: <McKeel_Comment_AllenNov2012.pdf> 1.1 MB

Please accept the attached PDF file as my comment on David Allen's DCAS/NIOSH latest Discussion paper on the General Steel Industries (GSI) site. The Allen paper was prepared for the TBD-6000 work group at its scheduled Nov. 28, 2012 next meeting. The Allen paper analyzes additional surrogate data sources to be used in a future revision to Appendix BB to account for uranium intakes at GSI. I wasn't sure whether or not Ted Katz, DFO, forwarded your office a copy of the attachment. Thank you.

-- Dan McKeel 11/10/12

In a message dated 11/9/12 12:40:44 PM, _____ writes:

Paul Ziemer, Chair, and members of the TBD-6000 work group
Ted Katz, ABRWH DFO
Members of the ABRWH full Board
NIOSH Docket 140 (GSI) Office

November 9, 2012

Attachment: <McKeel_Comment_AllenNov2012.pdf> 1.1MB

Dear Dr. Ziemer,

I have attached as a PDF file my comment related to the latest David Allen and DCAS/NIOSH Discussion paper that was posted on the DCAS website on 11/8/12.

Ted Katz, please distribute this Discussion comment paper to the full Board membership.

NIOSH Docket 140 Office, please consider posting this message and the attached PDF file to the DCAS website as a discussion paper for the Nov. 8, 2012, TBD-6000 work group meeting.

Thank you -- Dan McKeel 11/9/12

Daniel W. McKeel, Jr., MD
GSI SEC-105 co-petitioner

Daniel W. McKeel, Jr., MD

Daniel W. McKeel, Jr. ADDENDUM COMMENT
David Allen November 2012 Discussion Paper
Additional Air Sample Surrogate Data for GSI
November 12, 2012

Further research prompts these additional comments to be added to my previous 11/9/12 review and rebuttal of the Allen Nov. 2012 discussion paper on GSI air intake surrogate data sources.

1. Surrogate air sample data sheets from two sites (**LeBlond**, **Chambersburg**) listed in the Attachment 1 table were provided by Allen in his August 2012 Discussion paper on the same topic, so they are not actually "additional" sites.

2. The **Heald Machine Company** and its data sheet, and the **Simonds Saw and Steel**, surrogate sites listed in the Allen August 2012 paper are not used in Attachment 1 table 1. That fact is not explained in the Allen Nov. 2012 paper. The omission of Heald is puzzling: if that site data was applicable in August 2012 to GSI air intakes, why is it not applicable and included in the table of Attachment 1 of the November 2012 paper only three months later?

McKeel footnote: I have asked why the Simonds Saw and Steel site, which already has an SEC, was only recently added to the task assignment for the TBD-6000 work group? To date I have not received a satisfactory answer from the work group chair, Dr. Ziemer.

3. The additional (not previously identified) surrogate data sites added by Allen in the November paper were "**Tocco**" (only designation in Allen November 2012), **Fernald** (FMPC) and **Weldon Springs** (*sic*) sites.

4. The air samples are not classified according to the three required air intake sampling groups that HASL and the AEC said were necessary to characterize MAC "dust" samples (see Adley 1952): general air, breathing zone, process. This important omission seriously limits the utility of the surrogate data Allen provides and pools together from four different types of uranium metal products at five different sites and combines into a single value that NIOSH intends to incorporate into Appendix BB using some future model at some unidentified future date. The work group and full Board should reject such a casual approach. NIOSH needs to have a validated intake model for GSI in place now as the TBD-6000 work group and the full Board approach votes on the GSI SEC-00105 recommendation on August 28, 2012, and at the December 2012 ABRWH meeting at Oak Ridge, Tennessee.

5. All **Tocco** samples were from slugs that (a) were not used at GSI, and (b) that were not further characterized as to size and weight in the three Tocco FUSRAP documents on the Internet in the DOE-LM Considered Sites Database as Ohio site 42-1, -2 and -3. Data sheet 42-1 is appended to this ADDENDUM report.

6. Four of the six (6) **LeBlond** air sample activities (dpm/m3) are based on billets listed in Attachment 1 and are "nd" non detect. The values are not therefore scientifically informative absent any added information on how they were measured. No measurement methods are stated for any of the air sample activity values reported in the ATTACHMENT 1 table of Allen, Nov. 2012.

7. All nine (9) of the **Fernald derby air samples** were covered under a footnote that stated the following: *"(1) Values listed as maximum, minimum and average were used as three different samples."* What does this mean? How can such nonstandard and deceptive data manipulation be scientifically defended? Dan McKeel's view is, it cannot be. Derbies were not used at GSI and therefore are, *per se*, not justified as surrogate data at that site.

8. Of the eleven (11) Weldon Springs (*sic*, site name is Weldon Spring singular) air samples, three are slugs and eight (8) are dingots. One dingot air sample is labeled "nd" (not detect) and three (3) dingot air samples are samples are footnoted as follows in the ATTACHMENT 1 table of 37 samples:
• Footnote 2: "*Values back calculated using conversion factors at the bottom of the summary report.*" How can a reader possibly evaluate the scientific validity of such derived secondary data absent having the summary report? Allen should have provided the primary data. Those three back calculated activity values are higher than the other WS dingot air sample values that were not back extrapolated. The WS dingot values are not further characterized and thus cannot be considered scientifically valid until support information is supplied to the work group and the full Board and the petitioners for review.

The 11 Weldon Springs air samples were collected on only four dates, so this is a very tiny and not representative statistical sampling of the universe of WS air sampling data. Weldon Spring DOE site is not similar to the AWE site.

Respectfully submitted,

Daniel W. McKeel, Jr.

Date: 11/11/12

Contact information:
Daniel W. McKeel, Jr., M.D.
GSI SEC-00105 co-petitioner

OH.42-1

THK & K
OFFSITE Comp

NLO

NATIONAL LEAD COMPANY OF OHIO
HEALTH AND SAFETY DIVISION – ANALYTICAL DEPT.

ANALYTICAL DATA SHEET

INDUSTRIAL HYGIENE AND RADIATION DEPT.					ANALYTICAL CHEMISTRY SECTIO
I. H. NO.: 933	SAMPLE NOS.: 15	DATE COLLECTED: 6-6-68	BY: Cur	ROUTE TO: Cur	DATE RECEIVED: BY:
LOCATION: Tocco – Cleveland	TYPE OF SAMPLE: air dust	ANALYZED FOR: F, U, NO_3, Oil, Be, Cl; Alpha, Beta, Ra, pH, Th, TSS			DATE REPORTED: 6/13/68 BY: SWN
REMARKS: Normal + Depleted slugs Being Heat Treated					METHOD OF ANALYSIS: MAC #3 0811 hrs 6/12 BY:
					COUNTING DATA: BKGD .14 c/m GEO 41%

SAMPLE NO.	HOUR	SAMPLE DESCRIPTION	R	T	Q	c	t	c/m	d/m
6321	10:26	BZ Loading slugs at loading tray – heating	.03	1	.03	5	30	0.03	5
6322	10:27	Same		1	.03	11	30	0.23	37
6323	10:28	Same		1	.03	5	30	0.03	5
6333	11:15	BZ Loading slugs – N. Rust		.6	.018	7	30	0.09	24
6334	11:16	Same		.5	.015	3	30	ND	ND
6335	11:17	Same		.5	.015	6	30	0.06	19
6342	11:45	BZ Unloading slugs from conveyor + putting in box		.5	.015	19	30	0.49	15
6343	11:47	Same		.5	.015	14	30	0.33	10
6344	11:50	Same		.65	.019	42	30	1.26	32
6345	1:05	Same		.5	.015	10	30	0.19	5
6346	1:07	Same		.5	.015	23	30	0.63	20
						TC #4 c/m	41%	0805 hrs	
6347	1:09	Same		10	.03	18	30	0.44	71
6325	10:26	GA 5' from end of conveyor		10	.30	16	30	0.37	6
6328	10:36	Same		5	.15	16	30	0.37	12
6331	10:41	Same	↓	5	.15	16	30	0.37	12

NO.	DISTRIBUTION OF COPIES
1	Analytical Laboratory *(RECORD COPY)*
2	Industrial Hygiene & Radiation Dept.
3	Water Treatment Plant *(For Water Samples Only)*