

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

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**From:** james-ponto@uiowa.edu  
**Sent:** Wednesday, August 03, 2011 11:27 AM  
**To:** NIOSH Docket Office (CDC)  
**Subject:** 190 - NIOSH List of Antineoplastic and Other Hazardous Drugs in Healthcare Settings 2012: Proposed Additions and Deletions to the NIOSH Hazardous Drug List Comments

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**Comments**

I strongly support the proposed deletion of the two radiopharmaceuticals (ibrutumomab tiuxetan and tositumomab) from the hazardous drugs list. The primary risk from radiopharmaceuticals is related to their radioactivity (rather than related to their chemical properties), and because radiopharmaceuticals are regulated by the U.S. Nuclear Regulatory Commission (NRC), their inclusion under NIOSH is not appropriate.

Also, I note that pentetate calcium trisodium remains on the list. I understand that pentetate calcium trisodium is, in larger mass quantities, a therapeutic drug. However, in much smaller mass quantities radiolabeled with Tc-99m, pentetate calcium trisodium is also a diagnostic radiopharmaceutical. Because the NIOSH hazardous drugs list states only the drug component, it is ambiguous whether or not it applies the radiopharmaceutical. Hence, I recommend that something be done (eg, asterisk with footnote) to indicate that the listing of pentetate calcium trisodium does not apply to the radiopharmaceutical Technetium Tc 99m pentetate calcium trisodium.

Thank you for your consideration of these comments.