

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

From: Mark Ellis <markellis@ima-na.org>
Sent: Thursday, December 29, 2011 2:54 PM
To: NIOSH Docket Office (CDC)
Cc: markellis@ima-na.org
Subject: Docket No.: NIOSH-240; Request for Information: NIOSH Cancer-REL Policies
Attachments: IMA-NA Comments - NIOSH Cancer-REL Policies.pdf; ARASP Comments on the NIOSH Proposed Revisions to Cancer-REL Policies - 12 28 11.pdf

Importance: High

Dear Sir or Madam:

Please find attached the comments of the Industrial Minerals Association – North America (IMA-NA) in response to the Request for Information issued by the National Institute for Occupational Safety and Health (NIOSH) regarding the Institute's carcinogen and recommended exposure limit policy assessment.

Please let me know if you have any questions, comments or suggestions regarding this matter.

Best—

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December 29, 2011

National Institute for Occupational Safety and Health
NIOSH Docket Office
Robert A. Taft Laboratories, MS-C34
4676 Columbia Parkway
Cincinnati, Ohio 45226

SUBMITTED VIA E-MAIL: nioshdocket@cdc.gov

RE: Request for Information: Announcement of Carcinogen and Recommended Exposure Limit (REL) Policy Assessment
(Docket No.: NIOSH-240)
(76 *Federal Register* 52664, et seq.; August 23, 2011)
(76 *Federal Register* 60500, September 29, 2011)

Dear Sir or Madam:

The Industrial Minerals Association – North America (IMA-NA) is pleased to offer the following comments in response to the above-referenced Request for Information issued by the National Institute for Occupational Safety and Health (NIOSH) regarding the Institute's carcinogen and recommended exposure limit policy assessment.

IMA-NA is a Washington, DC-based trade association created to advance the interests of North American companies that mine or process minerals used throughout the manufacturing and agricultural industries. Its producer membership is comprised of companies that are leaders in the ball clay, barite, bentonite, borates, calcium carbonate, diatomite, feldspar, industrial sand, kaolin, magnesia, mica, soda ash (trona), talc, wollastonite and other industrial minerals industries. In addition, IMA-NA represents associate member companies that provide equipment and services to the industrial minerals industry. Additional information on IMA-NA can be accessed through the following hyperlink: <http://www.ima-na.org>.

Since its inception in 2002, IMA-NA has worked cooperatively with NIOSH. IMA-NA recognizes that the first priority and concern of all in the mining industry must be the health and safety of its most precious resource – the miner. To that end, IMA-NA offers the following comments to NIOSH.

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IMA-NA has had occasion to work with The Center for Advancing Risk Assessment Science and Policy (ARASP). ARASP¹ is a coalition of independent groups and associations that promotes the development and application of up-to-date, scientifically sound methods for conducting safety assessments. ARASP fosters activities to promote adoption of policies and practices, both within and outside government, helping to assure that the best available science underlies chemical safety determinations. Many of the companies that participate in ARASP member organizations are very familiar with the management of possible carcinogens in the workplace and the establishment of exposure limits for these substances. As such, IMA-NA believes that ARASP can provide NIOSH with useful information in response to this request.

IMA-NA has had the opportunity to review the comments of ARASP on the NIOSH Request for Information (copy attached). IMA-NA endorses ARASP's comments, incorporates them by reference and adopts them as its own comments to NIOSH on this matter.

IMA-NA is pleased to have had the opportunity to comment on NIOSH's request for information on the Institute's carcinogen and recommended exposure limit policy assessment and it stands ready to assist in a constructive manner in the further elucidation of cancer and REL policies. Please do not hesitate to contact me should you have any questions, comments or suggestions regarding this matter.

Yours truly,



Mark G. Ellis
President

Attachment

¹ ARASP is comprised of the following member organizations: ACC Chlorine Chemistry Division, ACC Ethylene Oxide Panel, ACC Olefins Panel, ACC Propylene Oxide/Propylene Glycol Panel, ACC Regulatory and Technical Affairs Department, The Acrylonitrile Group, American Cleaning Institute, American Petroleum Institute (API), CropLife America, Silicones Environmental, Health and Safety Council of North America, and Styrene Information and Research Center (SIRC)