



PB91135061



Comments to EPA

COMMENTS OF THE
NATIONAL INSTITUTE FOR OCCUPATIONAL SAFETY AND HEALTH
ON
THE ENVIRONMENTAL PROTECTION AGENCY'S
PROPOSED RULE ON
PROPOSED PROHIBITION OF
HEXAVALENT CHROMIUM CHEMICALS IN COMFORT COOLING TOWERS

40 CFR Part 749
Docket No. OPTS-61012

U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES
Public Health Service
Centers for Disease Control
National Institute for Occupational Safety and Health

September 27, 1988

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Comments to EPA

September 27, 1988

Ms. Karen L. Blanchard
Acting Chief
Program Integration and Health Section
United States Environmental Protection Agency
Office of Air Quality Planning and Standards
Research Triangle Park, North Carolina 27711

Dear Ms. Blanchard:

Thank you for your letter of September 8, 1988, in which you asked for a summary of NIOSH's current position regarding the health effects from exposure to hexavalent chromium (CrVI). As a result of NIOSH's recent response to OSHA regarding the proposed changes to their air contaminants standard, NIOSH has updated its position regarding CrVI and other chrome compounds. I have enclosed copies of these responses for your use.

NIOSH's current published policy states that only the insoluble forms of CrVI are potential human carcinogens (NIOSH 1973, NIOSH 1975). Since those publications, new scientific evidence has not only demonstrated the carcinogenic activity of soluble CrVI compounds in exposed animals (Glaser et al., 1986; Levy et al., 1986; Steinhoff et al., 1986) but also has shown epidemiological evidence that indicates similar carcinogenicity among workers exposed to soluble CrVI (Blair and Mason 1980; Franchini et al., 1983; Royle 1975; Silverstein et al., 1981; Sorahan et al., 1987). Based on this evidence, NIOSH recommends that OSHA consider all CrVI compounds as potential occupational carcinogens (see enclosed NIOSH testimony at the OSHA PEL hearing). In the coming year, NIOSH expects to more thoroughly examine the scientific data published since the CrVI Criteria Document and will determine then whether a new or revised Criteria Document should be developed.

Please call if I may be of further assistance (FTS 684-8339).

Sincerely,

Laurence D. Reed
Acting Associate Director for
Policy Development, DSDTT

2 Enclosures

cc:
H. Ahlers
B. Hardin
K. Hatfield
D. Manning
H. Hannon

Enclosures and/or attachments that are not included are available free of charge from the NIOSH Docket Office [513/533-8450].

REPORT DOCUMENTATION PAGE		1. REPORT NO.	2.	PB91-135061	
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16. Abstract (Limit: 200 words) This testimony summarized the current position of NIOSH regarding the health effects from exposure to hexavalent chromium (18540299) (CrVI). The current published policy stated that only the insoluble forms of CrVI are potential human carcinogens. Since these facts were published, however, new scientific evidence has demonstrated the carcinogenic activity of soluble CrVI compounds in exposed animals and has also shown epidemiologic evidence indicating similar carcinogenicity among workers exposed to soluble CrVI compounds. NIOSH now recommends that OSHA consider all CrVI compounds as potential occupational carcinogens.					
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