



MASSACHUSETTS BREAST CANCER COALITION

NIOSH Docket Office (nioshdocket@cdc.gov)
Robert A. Taft Laboratories,
MS-C34, 4676
Columbia Parkway, Cincinnati, Ohio
45226

Dear Dr. John Howard,

Thank you for the opportunity to provide comments on the draft of the proposed carcinogen policy. The Massachusetts Breast Cancer Coalition (MBCC) is a state-based nonprofit organization dedicated to preventing environmental causes of breast cancer through community education, research advocacy, and changes to public policy. Together with our sister organization, Silent Spring Institute, we are the only team of organizations working primarily toward the goal of preventing breast cancer for future generations. MBCC supports the previous comments submitted by Silent Spring Institute and would like to add the following comments.

First, one extra cancer case per 1000 exposed workers is not an acceptable goal for NIOSH to set. It is way too high. For the general population EPA is concerned about one additional case per million exposed, and goals for carcinogens in drinking water are set (appropriately) to zero. NIOSH, as a research agency, should be articulating a goal of zero or the lowest possible exposure for carcinogens. OSHA, as a regulatory agency, is responsible for considering feasibility of exposure controls and availability of alternatives when they set standards. It is not appropriate for NIOSH to offer one per thousand as an acceptable workplace cancer risk.

Second, we support NIOSH using all available information to develop a list of carcinogens in the workplace and we especially recommend they include a comprehensive list of potential tumor sites, with greater attention to potential breast carcinogens. It is important for workers and occupational safety professionals to know if chemicals are potential breast carcinogens. Silent Spring Institute has published lists and evaluations of chemicals of concern for breast cancer, and these findings should be reflected in NIOSH cancer listings.

Sincerely,

Cheryl Osimo
Executive Director
Massachusetts Breast Cancer Coalition
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