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From: -Occupational-Exposure-to-Diacetyl-and-2
Sent: Tuesday, October 11, 2011 1:30 PM
To: NIOSH Docket Office (CDC)
Subject: 245 - Criteria for a Recommended Standard: Occupational Exposure to Diacetyl and 2,3-pentanedione Comments

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Comments

In response to Docket Number NIOSH-245, we reviewed Section 2.5.6, including Table 2: Investigations of facilities using or producing diacetyl, located on pages 43 through 45 of the draft document, Criteria for a Recommended Standard: Occupational Exposure to Diacetyl and 2, 3-Pentanedione.

We suggest the following modifications to Section 2.5.6:

PAGE 43

Line 13:

Replace the words "...flavorings, including diacetyl..." with "...formulated flavorings, including flavorings that contain diacetyl...".

This change will more clearly indicate that diacetyl-containing flavorings (but not pure diacetyl) were either used or manufactured by all facilities described in Section 2.5.6 and Table 2.

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Line 9:

Move "ND*" to the MEASUREMENT RANGE column.

In the CONTROLS IN PLACE column, add "Dilution ventilation; heat extraction for adjacent process".

Lines 25-26:

Modify capitalization and punctuation in CONTROLS IN PLACE column to read: "Heat extraction hoods, dilution ventilation".

Lines 29-31:

Revise CONTROLS IN PLACE column to read: "Dilution ventilation, slot hood at tumbler, modified tank cover, work practice changes".

Lines 37-39:

Revise CONTROLS IN PLACE column to read: "Dilution ventilation; controls for other purposes: immediate rinsing, cool temperature".

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Line 5:

Revise CONTROLS IN PLACE column to read: "Dilution ventilation, hose from tank to floor drain".

Line 9:

Revise CONTROLS IN PLACE column to read: "Dilution ventilation, oven room heat extraction".

As part of the review, we compared the measurement ranges listed in Table 2 to the diacetyl exposure results obtained from surveys performed at each facility (i.e., OSHA A through OSHA L). We determined that all exposure level ranges identified in Table 2 accurately represent the reported levels and no revisions are necessary.