

The following comments are in response to the Request for Information (RFI) concerning potential amendments to 10 CFR 850 "Chronic Beryllium Disease Prevention Program" published in the Federal Register on December 23, 2010.

1. The Department should continue to use the action limit on the OSHA PEL unless a measurable reduction in risk is not achieved. The Department should take feasibility of the proposed criteria taken into account.
2. See 1. In addition, institution of the ACGIH TLV as a replacement for the DOE AL will likely impose costly requirements and schedule impacts to Sandia's operations without measurable decrease in risk. Activities associated with exposure in excess of the ACGIH TLV require respiratory protection, but do not require the institution of an 850.26 Regulated Area as airborne levels are not in excess of the DOE AL. Based on Sandia's operational requirements, it would be particularly difficult to comply with this proposed change.
3. No. See 1 and 2. The Department should rely on consensus standards which account for feasibility.
4. Sandia cannot comment on the reliability or requirement for use of dry wipes as only wet wipes are employed for characterization of removable surface beryllium contamination.
5. If a robust understanding of the background beryllium levels is available, including the ability to discriminate from or adjust for background, wipe sampling can provide a qualitative means for controlling contamination and reducing the potential for dermal exposure. It is unclear what, if any, direct relationship exists between this data and inhalation exposure. Current wipe sampling protocol and methodology do seem to provide analytically reliable and accurate results.
6. Sandia prefers the use of an IOM sampler as opposed to the button sampler unless monitoring a job is of short duration. The IOM calibration has proven to be more stable relative to the button sampler; however, button samplers can operate at up to 4 lpm for short duration activities.
7. To this point there is no obvious relationship between the total and inhalable fraction. Any relationship will be variable and process dependent with highly energetic activities (i.e., welding, grinding) likely producing a greater inhalable fraction relative to non-energetic or less-energetic activities such as milling.
8. See 1, 2, and 3. The Department should rely on consensus standards for airborne exposure which account for feasibility. Surface contamination should not be built into the exposure limit. To release a building from contamination controls, Sandia uses the DOE release criteria of 0.2 ug/100cm<sup>2</sup>. That combined with implementation of the required housekeeping limit associated with operational areas meet the intent to reduce removable surface contamination. The addition of an action limit is not warranted.
9. Warning labels should be required for release of equipment which has the potential to expose personnel to beryllium through foreseeable circumstances regardless of the applicability of the rule. This should include all foreseeable maintenance and equipment operation scenarios.
10. See 1, 2, 3, and 8. The release of a regulated area to a beryllium operational area is currently based on air monitoring considerations. The release of a beryllium operational area from all beryllium controls is dependent on surface release criteria with no air monitoring considerations. With no ongoing operations, there is no additional risk for airborne concentrations of beryllium and conducting additional monitoring provides no pertinent information.
11. No comment.

Thank you for the chance to provide input.

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