Cambridge
Public Health
Department

May 29, 2020

Dan Sieger, Chair
TURA Administrative Council
Executive Office of Energy and Environmental Affairs
100 Cambridge Street, Suite 900
Boston, MA 02114

David Williams, Chair
TURA Science Advisory Board
Bureau of Environmental Health / Community Sanitation Program
250 Washington Street, 7th floor
Boston, MA 02108

Dear TURA Administrative Council and Science Advisory Board Chairs:

We are writing today in support of the attached petition requesting that TURA list carbon nanotubes (CNTs) and carbon nanofibers (CNFs) among the chemicals considered to be hazardous and establish a reporting threshold of 100 grams for the purposes of reporting. This letter also indicates our support for the proposal that these substances be listed as a group, rather than individually, since they are often used in mixtures and can be otherwise very difficult to report as individual compounds.

Through our own efforts to identify and monitor the use of engineered nanomaterials in 2007 and 2008, the City of Cambridge and the Cambridge Public Health Department determined that information related to the manufacture, processing and other use of engineered nanomaterials was not available. Even after a survey was developed, in collaboration with the Cambridge Fire Department, details of the presence of engineered nanomaterials and specific health and safety plans intended to address potential exposures was not substantially made available. In particular, we find it easy to support the efforts of Cleanwater Action to ask the TURA Administrative Council and Scientific Advisory Board to list carbon nanotubes and carbon nanofibers as reportable within Massachusetts.

While the evidence of pathologies associated with exposure to CNTs is slow to emerge, the pattern of evidence is disturbing and includes clear evidence of pulmonary toxicity and carcinogenesis. The available evidence and the importance of the nanomaterials sector (and related sectors that utilize these materials) is sufficient, at a minimum, to establish a reliable information-gathering mechanism so that emerging evidence indicating risk can lead to responsible policy options for TURA and the Commonwealth.

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One factor in requesting this listing, already indicated above, is the general lack of transparency from the materials manufacturers or processors when requested to share information on the presence of these material or to disclose applicable safety practices intended to protect their staff and near neighbors.

By contrast, Cambridge has worked with the biotech sector from its infancy to establish basic oversight and transparency mechanisms while guaranteeing the right to operate under best practice standards that are already considered to be industry norms. This early willingness to help local authorities to establish public assurance on the part of scientists and entrepreneurs has led to a powerful research and development sector that now has deep roots in Massachusetts. Indeed, the adoption of local rules that enable such information-sharing has been promoted by the Mass Biotech Council (massbio.org) across the state.

We firmly believe that this was the result in part of the partnership and willing cooperation between research institutions, public health departments, and the public. Please consider inclusion of CNTs and CNFs on the list of reportable hazards above 100g. We have a successful blueprint for adoption and acceptance of emerging technologies in Massachusetts that we should be proud to draw from and this will be a valuable first step.

Sincerely,

Claude A. Jacob
Chief Public Health Officer
Cambridge Public Health Department

Sam Lipson
Director, Environmental Health
Cambridge Public Health Department

Cc: Louis A. DePasquale, City Manager, City of Cambridge
Assaad Sayah, MD, Commissioner of Public Health, City of Cambridge