Docket ID: OSHA-2009-0041

Re: Formaldehyde standard information collection requirements

As a physician-scientist specializing in pathology, I have been frequently exposed to formaldehyde in my training and clinical practice. As a pathologist, I am concerned about both short- and long-term risks of formaldehyde exposure.[1,2] As such, I support ongoing data collection regarding workplace formaldehyde exposures, policies, and procedures.

Although most clinical laboratories have some form of mitigation and monitoring in place, I have often found these to be inadequate. Formalin vials are handled on countertops without appropriate ventilation, sometimes without eye protection. Workers are expected to continue work with formaldehyde-fixed tissues during ventilation downtimes when vapors accumulate. Appropriate respiratory protection for formaldehyde vapors has not been available to me in any workplace, and training was not provided as far as what to do for any type of exposure except for a splash to the skin, eyes, or mucus membranes. During one extended ventilation downtime, I had to bring my own respiratory with appropriate formaldehyde organic vapor cartridges from home, and extensive advocacy was needed to obtain an appropriate instantaneous monitoring device for formaldehyde vapors. Routine monitoring for formaldehyde occurs only at the minimum frequency required for compliance and only captures typical use rather than the full spectrum of common circumstances that are more likely to lead to health consequences for exposed workers.

I oppose broad deregulatory actions in the area of formaldehyde protection. Instead, I support that formaldehyde standards should be strengthened to improve healthcare and other worker protections. Any changes to formaldehyde standards and information collection must be accompanied by thorough analysis and opportunities for open discussion amongst experts, as well as opportunities for oral testimony in addition to written public comments. Input from CDC's National Institute for Occupational Safety and Health (NIOSH) must be included, and the agency should be fully staffed and supported to provide appropriate scientific guidance.

Sincerely,

Kaitlin Sundling, MD, PhD

References

1. CDC. About Formaldehyde and Reproductive Health. Reproductive Health and The Workplace. September 4, 2024. Accessed November 1, 2025. https://www.cdc.gov/niosh/reproductive-health/prevention/formaldehyde.html

2. Formaldehyde - Cancer-Causing Substances - NCI. March 20, 2015. Accessed November 1, 2025. https://www.cancer.gov/about-cancer/causes-prevention/risk/substances/formaldehyde