

Reuss, Vicki A. (CDC/NIOSH/EID)

From: Lentz, Thomas J. (CDC/NIOSH/EID)
Sent: Friday, August 29, 2008 9:00 AM
To: Miller, Diane M. (CDC/NIOSH/EID)
Cc: Reuss, Vicki A. (CDC/NIOSH/EID)
Subject: FW: NIOSH Control Banding Draft Document Posted
Attachments: Bracker comments NIOSH CB.pdf

Diane and Vicki,

Here is another one for Docket 138. Again, I apologies for the delay in forwarding.

Thanks,
T.J.

From: Bracker, Anne L. [mailto:bracker@nso.uhc.edu]
Sent: Thursday, July 03, 2008 3:22 PM
To: Lentz, Thomas J. (CDC/NIOSH/EID)
Subject: RE: NIOSH Control Banding Draft Document Posted

Dear T.J.

I enjoyed our conversation yesterday. I hope you made it safely back into your office after the fire drill. Attached are my comments on the NIOSH draft Control Banding Document. (hard copy in the mail) Thank you for giving me the opportunity to review and comment. It is a very impressive and informative publication.

Best, Anne

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From: Lentz, Thomas J. (CDC/NIOSH/EID) [mailto:tbl7@cdc.gov]
Sent: Wednesday, May 14, 2008 9:05 AM
To: Chiusano, Stephen V., OIG DoD; Deborah Nelson; neil@purdue.edu; chiusano@yahoo.com; lerick2@hallmark.com; cgeraci@cdc.gov; pH2@sprynet.com; mhooover1@cdc.gov; kupfert@bp.com; tlentz@cdc.gov; bowens@unr.edu; sdripple@dow.com; Erica.Stewart@kp.org; esullivan@ody.ca; bonnie.weeks@genzyme.com; dwoodhull@orc-dc.com; zalk1@lntl.gov; mharper@cdc.gov; carolyn.harvey@eku.edu; randal.keller@murraystate.edu; uro@ornl.gov; rstone@unr.edu; robert.sussman@safebridge.com; keithtait@frontiernet.net; Bracker, Anne L.; Jim Platner; Deborah.Nelson.CIH@gmail.com
Cc: Thursa La
Subject: NIOSH Control Banding Draft Document Posted

Members of the Control Banding Work Group,

I want to inform you that the NIOSH draft Control Banding Document (***Qualitative Risk Characterization and Management of Occupational Hazards (Control Banding [CB]): A Literature Review and Critical Analysis***) has been posted to the NIOSH Web site. The document may be accessed at <http://www.cdc.gov/niosh/review/public/138/> during a public review and comment period of approximately 90 days.

Best regards,

T.J. Lentz

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RE: Comments on NIOSH Draft Document: ***Qualitative Risk Characterization and Management of Occupational Hazards (Control Banding [CB]): A Literature Review and Critical Analysis***

Dear Dr. ^{T.J.}Lentz,

Thank you for giving members of the AIHA Control Banding Working Group the opportunity to review NIOSH's Literature Review and Critical Analysis of the Control Banding Model. The document is impressive and represents an enormous effort. I have a few comments on the document for your consideration. I hope they are useful.

1. More Emphasis on CB and "Best Practices": Many health and safety professionals have the mistaken impression that control banding (CB) always involves a chemical by chemical assessment of risk. (The combination of a substance's inherent toxicity and its exposure potential determine the desired control band for a task.) Many CB models offer "direct advice" (best practice) controls which remove the interim steps of evaluating specific chemical hazards and exposures. I think it is important to emphasize the fact that both approaches can be found within the CB literature. Could the "Best Practices" approach to control banding be introduced earlier in the document?

For example, could the definition of control banding (Page xvi, line 2) be expanded to incorporate the general concept that the model assigns intervention categories (control bands) to work tasks after the completion of a semi-quantitative risk assessment? As written the definition is more limited to the chemical by chemical approach described in COSHH Essentials.

This concept of "best practices" is first raised on Page 34 (1.3.4 Providing Control Guidance to Users). It is touched on again on Page 88, Lines 9-10 when the authors mention a *solutions database* and on Page 110, line 1 when the authors recommend assistance on implementing control measures. Could these sections be expanded to incorporate the international work that has been done in the "Best Practice" area?

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2. CB is not only COSHH Essentials- consistent message: Although the NIOSH document makes the important point that equating COSHH Essentials with CB is a weakness that many are attempting to address (Zalk and Nelson, 2008 for example), the document itself makes the same mistake.

It is my understanding that not all CB models use R-phrases to assign hazard classifications. Concerns associated with the interpretation of R-phrases should be noted as a potential weakness of some of the models, not CB in general. (Page vii, lines 10-12 and Section 2.1.10)

Much of the document's Critical Analysis (Page 53) focuses on COSHH Essentials. The authors should emphasize that the conclusions reached do not necessarily apply to all CB models. Pages 17-34 are devoted to a detailed description of the development and validation of COSHH essentials. Maybe this section could be condensed a bit.

I was impressed with the manuscript's very nice summary of the International Approaches to Control Banding.

3. Expansion of Overall Strengths: The executive summary sets the stage for the entire document. Beginning this section with the suggestion CB is only useful in the absence of an OEL is misleading. (Page v, lines 4-6) Control banding can be used to supplement or enhance the traditional occupational exposure level (OEL) approach to risk assessment.

In the Overall Strengths section (Page 67) knowledge management and electronic communication are highlighted as benefits of CB models. I think this Section should be expanded to make a strong statement that the model could be of value to the small-medium sized enterprises (SMEs) and international workplaces without access to professional industrial hygiene (IH) consultation. The expert systems are designed to help these groups manage hazards. In this respect, CB is a true Research to Practice initiative. The model provides workplaces with practical guidance on how evaluate risk and implement controls. These introductory sections should note that control banding is not a cookbook- the models allow for a discussion of risk.

Table 16 provides a very nice synthesis of the strengths and weaknesses of CB.

4. Interpretation of Jones and Nicas' publication: Jones and Nicas (2005b) raise important points but I feel that some of their conclusions have been misinterpreted. (Page 40 and Page 83, lines 12-18) For this reason, the "Letter to the Editor" that responds to their work should be summarized in the NIOSH document as well. (Evans and Garrod, 2006) Using COSHH Essentials Jones and Nicas observe that the CB model recommends engineering or special advice control bands for the degreasing operations they evaluated. I believe most IHs would make the same recommendation. I do not believe COSHH Essential should be faulted (under/over control errors) if the controls themselves were not working as designed.