

LABORERS' HEALTH & SAFETY FUND OF NORTH AMERICA

July 9, 2008

Paul A. Schulte, Ph.D
Director
Education and Information Division
Centers for Disease Control and Prevention
National Institute for Occupational Safety and Health
Robert Taft Laboratories
4676 Columbia Parkway
Cincinnati, OH 45226

RE: *Qualitative Risk Characterization and Management of Occupational Hazards (Control Banding [CB]): A literature Review and Critical Analysis.*

Dear Dr. Schulte:

Control banding (CB) strategies offer simplified solutions for controlling worker exposures to chemical constituents often encountered in the workplace. Based on your review, CB strategies were created because the majority of chemical substances in use today do not have established occupational exposure limits and no broad model for workplace protection exists. CB models were designed for employers to use to reduce or eliminate workplace exposures to the large number of unregulated substances for which little direct toxicological information or exposure data is available. Given the rigors of the current regulatory environment, many of these hazardous substances will never be adequately regulated.

The document adequately summarizes CB strategies to control worker exposures to such hazards in the workplace. The literature review provides a useful accounting of the history of CB and discusses the pros and cons of it. The report flows smoothly and is consistent. Understandably, it is technical and geared toward a scientific audience; a less technical version of this literature review, geared toward safety people and workers, should also be written.

Although your review gives a fair presentation of the concerns and issues related to CB, one component of a safe workplace is missing. The role workers have in the development and/or implementation of CB strategies is not

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covered. CB strategies appear to be another top-down approach to worker safety that leaves workers with little involvement in their own protection. It would also be interesting to know the effect CB models have had on worker behavior. In addition, more discussion is warranted on whether the CB approach gets buy-in from workers and whether increased worker involvement through safety committees, for example, is constructive.

While CB is most useful for substances for which no exposure limits have been set, it can still be very valuable for hazardous substances where limits have been set but worker exposures are transitory and based on the occupation and tasks. For example, most construction workers will seldom have consistent eight-hour overexposures, but CB can make protection constant based on the task, e.g., always cutting concrete wet. Further research in this area of CB is needed.

Lastly, it appears that CB models can also be a less costly way of providing guidance and assistance to non-experts in small or medium-sized businesses. It would be useful to pursue further research to determine if this is true.

Thanks for giving me the opportunity to review the document. I hope that you find this information useful. Please feel free to contact me at (202) 904-5162, should you need any further information.

Sincerely,

Occupational Safety and Health Division

Cc:

Enclosure