

Dragon, Karen E. (CDC/NIOSH/EID)

From: Linda A Malley [Linda.A.Malley@usa.dupont.com]
Sent: Wednesday, November 19, 2008 10:22 AM
To: Dotson, G. Scott (CDC/NIOSH/EID); NIOSH Docket Office (CDC)
Cc: James P Zeigler
Subject: RE: NIOSH CIB-Strategy for the assignment of skin notations

I have 3 rather broad-based comments. I agree that the skin notation concept needs additional clarification to describe the type of skin effect and distinguish between local effects and systemic effects. As you know, other organizations also use the approach of adding a skin notation for systemic toxicity that occurs from dermal absorption of a material. Would it be possible to harmonize the NIOSH system with the other organizations, such as ACGIH and GHS? As a "customer" of various classification schemes, it is increasingly difficult to prepare appropriate safety and handling information with multiple classification schemes.

While I completely understand the need to differentiate between the varieties of skin and systemic effects encountered from dermal exposure the workplace, the detailed scheme described in CIB Strategy document is complex and may be more difficult for "customers" of the classification to apply.

Also, there is an additional category of skin irritants that should be recognized, such as items that cause mechanical irritation (e.g. fiberglass, wool, silica, etc). This type of irritation is distinct from a chemical irritation or sensitization response, but deserves mention since it often results in painful and/or visible dermal changes.

Please let me know if you have any questions, and thank you for the opportunity to review this document.

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11/10/2008 11:53
AM

Subject
RE: NIOSH CIB-Strategy for the
assignment of skin notations