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From: Fingerhut, Marilyn (CDC/NIOSH/OD) (CTR)
Sent: Sunday, June 08, 2008 4:13 AM
To: NIOSH Docket Office (CDC)
Cc: Lentz, Thomas J. (CDC/NIOSH/EID); Fingerhut, Marilyn (CDC/NIOSH/OD) (CTR)
Subject: 138 - Control Banding
Importance: High
Attachments: Comments on NIOSH Control Banding Document.doc

To: The NIOSH Docket
From: Marilyn Fingerhut, Ph.D. Consultant to NIOSH

Attached are my comments as of 8 June 2008 on the very fine NIOSH Control Banding Document. I have sent emails to the developers of recent CB systems requesting paragraphs and citations to be inserted into the CB Document, so I or they will be sending additional comments.

Thank you for the opportunity to provide these comments.

Regards,
Marilyn

Comments on NIOSH Control Banding Document
8 June 2008

Marilyn Fingerhut, Ph.D. Consultant to NIOSH mfingerhut@cdc.gov

These comments are intended to compliment NIOSH and the authors for a balanced consideration of the issues and for support of the powerful concept that simple guidance will bring help to employers and workers globally who do not currently have access or funds or knowledge to utilize expensive experts.

Recommendations:

- 1) Update the document to include recently developed and implemented systems and to point out current directions. I include a number of detailed suggestions below.
- 2) The NIOSH Health Hazard Program is situated to carry out approaches based in control banding systems and to carry out comparisons with the traditional approaches used by HETAB. Some efforts of DART engineers also are suitable. This should be addressed within NIOSH and noted in this document.

Specific details are suggested below. They primarily point out where a further update of systems might be inserted. TJ Lentz knows all of the current CB systems noted here. He and I are on the International Technical Group. I have sent emails to the key players to invite them to provide paragraphs and references.

The introductory pages of the document describe in detail analyses focused on COSHH. Consider if any very recent analyses, for example of COSHH or Stoffenmanager, etc are needed. Consider if the new German and Dutch and Dutch efforts should be included? (E.g. Rolf Packoff and Henri Heussen). These pages do provide detailed thinking in the pros and cons sections, so may be ok...as long as the newer CB systems are added later in the document.

Page-specific suggestions:

- p 47 line 8 Add weblink for RISKOFDERM
- p48 line 2 Add weblink for Silica Essentials
- p 49 line 1 Update if MOU has already been signed
 - line 12 Box Add Korea and China (Get their Chemical Control systems and describe in document)
- p 52 and following Add weblinks for each country CB system described on p 552-59
 - Add China and Korea systems. here.
- p54 Add new German and Dutch systems (Rolf Packoff/ Henri Heussen)
- p56 Add new Stoffenmanager CB Construction system
- p57 Add SOBANE Belgium system
- p58 Check that Singapore description is up to date
- p59 Add 1.6.7 Korea and 1.6.8 China
- p60 line 1 Change 'Recent' to 'Special' as 2002 is not recent...
 - line 2 Spell out fully First International Control Banding Workshop (ICBW)
 - line 5 Correct spelling (Vickers)
- p 63 line 17 and Appendix C. Check that the ITG version is current. Add weblink.
- p 65-82 Update this section BEYOND COSHH. Add critiques at least of Stoffenmanager.
- p66. Table 16 Missing from Table are some key issues, such as

- Usefulness to users
 - Effectiveness of controls
 - Impact on workplaces
 - Cost effectiveness for employers
 - Cost effectiveness to society
- p 83-88 Section 2.2. Review to make any needed changes to include systems added in Section 2.1
- p 89 section 2.3 Also review to make any needed changes to include systems added in Section 2.1
- p 91 2.3.1.2.1 Line 6 Add Stoffenmanager Construction
 2.3.1.2.2 Add Zalk Ergonomics
 2.3.1.2.3 Add Stavroula Leka Psychosocial Risk Management Toolkit (PRIMAT)
 2.3.1.2.4 Add Susan Wilburn/Maria Lioce-Mata Healthcare Workers Toolkit
- p 92 line 19 Add 'and other countries' after 'for implementation in the U.S'. Are there examples for which weblinks could be provided_
- p 93 line 17 Insert after 'twinning' the words 'and regional partnering'
- p 94 line 1 Spell out Occupational Risk Management (ORM) Toolbox
 line 15 Insert description and references and weblinks for GTZ/India partnering on tanneries (Kalpana Balakrishnan/ Alberto Cammacho)
 lines 16-33 Make this a paragraph to follow after the tannery example
 line 24 Insert a new section 2.3.2.1.2 (and renumber subsequent sections) on Regional Partnering of Countries. Insert the Americas Silica Control Banding effort (Faye Rice)
 line 25 Insert 'or sectors' after 'large scale industries'
- p 95 line 5 Delete sentence beginning 'Such efforts...' Replace with the following:
 Such efforts would be consistent with the activities of the World Health Organization Network of Collaborating Centers in their 2006-2010 Work Plan, which includes 25 risk management (CB) projects.
www.who.int/occupational_health
- p 95 line 14. Need reference...to what does this apply? Is it correct?
- p 101 section 2.5. Add Nanotechnology Section. Update as needed. 2.5.1 Ergonomics e.g. line 15. Do the same for Noise and Injury (Barrier Banding)
- p104 lines 13-15 Correction. Change to say 'The concept is currently housed within the WHO Collaborating Centers (WHOCC) Network Work Plan 2006-2010.
http://www.who.int/occupational_health
- p104 line 16 Change 70 to 65
- p 105 line 2 Spell out International Technical Group (ITG)
 line 4 Delete 'recently'.
- p 108 line 3 Add a sentence: 'Sharing of information about effectiveness of the controls, cost-effectiveness of the controls, user-friendliness of the guidance, and impact in workplaces and in society should be facilitated.
- p 109 line 5 This sentence is not clear..what is 2005 NCBW and what is meant by the sentence?
- p 111 Section 4.1.3 Add
- 1. Convert existing guides and solutions documents to 'toolkits' by beginning the document with instructions how to do a qualitative risk assessment of the workplace.

- 5. Develop sector specific toolkits, for example Health Care Workers and Construction.

p 112 line 4 START AT HOME!!!!!! Insert a s beginning of the second sentence
'The NIOSH Health Hazard Evaluation Program and ...continue with...the State OSHA..etc'

p 131 Appendix C Be sure this is the current ITG version.