

**Miller, Diane M. (CDC/NIOSH/EID)**

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**From:** Niemeier, Richard W. (CDC/NIOSH/EID)  
**Sent:** Thursday, October 02, 2008 12:26 PM  
**To:** Miller, Diane M. (CDC/NIOSH/EID); Helton, Norma L. (CDC/NIOSH/EID)  
**Cc:** Proffitt, Brenda L. (CDC/NIOSH/EID); Dotson, G. Scott (CDC/NIOSH/EID); Geraci, Charles L. (Chuck) (CDC/NIOSH/EID); Schulte, Paul A. (CDC/NIOSH/EID); Okun, Andrea H. (CDC/NIOSH/EID)  
**Subject:** Peer Review of NIOSH CIB A Strategy for Assigning the New NIOSH Skin Notations for Chemicals. NIOSH Docket Number **153**  
**Attachments:** Text of Final Letter - email to peer reviewers.doc

Attached is the final text of the email that I sent to the peer reviewers this morning with the list of names and addresses and the attachments of the CIB and COI form. Norma was listed as the point of contact for the travel arrangements in the email. Only [redacted] and [redacted] currently have plans to attend the public meeting. [redacted] declined to attend the meeting and we did not invite [redacted] since he is not in the US. Rick



Text of Final Letter  
- email t...

Master Email for Official Peer Review Invitation for *NIOSH Current Intelligence Bulletin: A Strategy for Assigning the New NIOSH Skin Notations for Chemicals*.

October 2, 2008

Dear Dr. \_\_\_\_\_:

Thank you for agreeing to participate as an external peer reviewer of the *NIOSH Current Intelligence Bulletin: A Strategy for Assigning the New NIOSH Skin Notations for Chemicals*. This document has been developed to provide the scientific rationale and framework for the assignment of skin notations that reflect the current state of knowledge about chemical hazards associated with dermal exposures. The Word version of the document is attached and a PDF

version is posted on the NIOSH website at <http://www.cdc.gov/niosh/review/public/> **153/**

Historically, NIOSH has relied on a single notation represented within the NIOSH Pocket Guide to Chemicals Hazards (<http://www.cdc.gov/niosh/npg/>) by the symbol "skin." As described in greater detail within the policy document, three major problems exist with the continued use of this skin notation, which was adopted as part of the 1988 Occupational Safety and Health Administration (OSHA) Air Contaminants Update project. First, the notations in theory are established based on the potential contribution of a chemical substance to systemic toxicity as a result of dermal absorption. However, in practice, the assignments of the notations have not consistently followed this principle. Second, the provision of a single skin notation limited to systemic toxicity often results in the appropriation of that warning for other serious dermal effects of local nature, such as corrosion and sensitization. Third, the skin notations as adopted following the PEL update project do not include skin exposure precautions made in NIOSH criteria documents.

In order to address these problems, NIOSH has developed an improved strategy for the assignment of skin notations. The new system relies on multiple notations capable of distinguishing between systemic, direct, and sensitizing effects associated with chemical exposures of the skin. These notations are assigned based on an extensive review of scientific data and reflect the contemporary state of knowledge. Additionally, the improved strategy allows for the combination of multiple skin notations to provide a warning when a chemical is linked to numerous adverse health effects.

During your review, please address the technical content only as the document will be edited after external review comments have been considered and incorporated into the document.

The following is a list of questions for you to consider as you review the document:

1. Are the proposed classes of skin notations appropriate?
2. Are the proposed criteria for assigning each type of skin notation appropriate?
3. Is the proposed assignment of multiple skin notations useful for protecting workers from dermal hazards?
4. Should the SEN notation apply strictly to allergic contact dermatitis or is it appropriate to assign the SEN notation for other immune-mediate responses, such as respiratory sensitization, airway hyperactivity and mucosal inflammation, associated with dermal exposure to a compound?
5. Does the proposed harmonization scheme found in Appendix G.2 link the new NIOSH skin notations and the GHS assignments sufficiently?
6. Should additional information be included within document? If so, what?
7. Do the data cited support the objectives of the document?
8. Are the conclusions appropriate in light of the current understanding of the toxicological data?

As a reminder and mentioned in my previous communication, the public review period will occur until Friday, November 7, 2008. A public meeting will be held on Thursday, November 6, 2008 from 9:00 a.m. to 4:00 p.m. at the NIOSH Robert A. Taft Laboratory Auditorium in Cincinnati, Ohio, as a forum for scientists and representatives of government agencies, industry, labor and other stakeholders to discuss the document. The meeting will be open to the public. You are invited to attend this meeting with expenses being paid by NIOSH. You will be contacted by a NIOSH staff member (Norma Helton, phone: (513) 533-8108 email: [NHelton@cdc.gov](mailto:NHelton@cdc.gov)) who will

make the arrangements. Immediately following the public meeting copies of the public comments will be made available to you on CD for consideration in your comments which will be due to the NIOSH Docket Office on Friday, November 21, 2008. Please send your written comments, preferably in Word format, to the NIOSH Docket Officer at [nioshdocket@cdc.gov](mailto:nioshdocket@cdc.gov), or NIOSH Docket Office, 4676 Columbia Parkway, MS C-34, Cincinnati, OH 45226. Within the subject line of your return email or written comments, please reference **NIOSH Docket Number /53**. If you have any questions concerning this document, feel free to contact the NIOSH Docket Officer at (513) 533-8611 or fax number (513) 533-8230.

In order to comply with the new CDC/NIOSH data quality requirements for the review of NIOSH publications, a Conflict of Interest form is attached for your review and signature. In addition, current curriculum vitae (CV) will be needed. Both can be delivered by fax, email, or regular mail to the NIOSH Docket Office. Please be aware that your name, affiliation, and CV will be posted on the NIOSH /CDC website along with a peer review report containing the peer review comments, without individual attribution, and the NIOSH response to each comment. Your review comments may be disclosed to outside parties if NIOSH is requested to provide this information under a Freedom of Information Act (FOIA) request.

We greatly appreciate your consideration to review of this document and look forward to obtaining your comments. Thank you for your assistance in this important review process.

Sincerely, Rick

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