

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

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**From:** eninger@gmail.com  
**Sent:** Thursday, March 01, 2007 9:29 AM  
**To:** NIOSH Docket Office (CDC)  
**Cc:** Doyle, Glenn (CDC/NIOSH/EID); Chen, Jihong (Jane) (CDC/NIOSH/EID) (CTR)  
**Subject:** 091 - oessm77-173 Comments

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**Comments**

1. NIOSH 77-173 is an excellent document and reference for compliance sampling.
2. Approaches for accounting for between-day variations in exposure must be included.
3. Approaches for exposure assessment under cost constraint should be included. In particular, the utility of judgmental sampling in determining peak or 95th% exposures.
4. The utility of screening sampling to determine if exposures are less than 10% of the OEL (assuming an underlying exposure distribution).
5. A concise discussion of the strengths and weaknesses of exposure groupings.
6. Prioritizing exposure risks under conditions of uncertainty.

I am available at the included email to answer any questions regarding my comments.