

Comments on DECOS draft document on Occupational Exposure during Coal Gasification by Crystal Forester, Research Chemist, NIOSH/National Personal Protective Technology Laboratory and Steven H. Reynolds, Research Pharmacologist, NIOSH/Health Effects Laboratory Division, 1095 Willowdale Road, Morgantown, WV 26505

PAGE & LINE	COMMENT
General Comments	The Committee's classification recommendations are appropriate and agree with IARC recommendations of carcinogenicity.
	Because of the complex mixed matrix of coal gasification, few studies exist to provide an overall assessment of the relationship of the process to human exposure. However, several studies of individual compounds that are produced during coal gasification do provide toxicity, mutagenicity, and carcinogenicity and are found in the literature.
	Consider including an addendum listing the products from the process and genotoxic and carcinogenicity classifications for each, if available.
	Literature used for the preparation of this document was retrieved from the online data bases Medline, Toxline, Chemical Abstracts, and RTECS through October 2018. An additional Medline search on 01/20/2019 revealed no additional studies of importance. All critical studies which are relevant to the assessment of whether occupational exposure during coal gasification may induce genotoxic effects and may cause cancer appear to have been included.
	The critical studies were presented in sufficient detail to support the conclusions concerning the characterization of risk.
	The presentation of the information is concise. No condensation of the data is needed.
	There are no obvious limitations of the critical studies which were not discussed in the document.
	There are no obvious alternative explanations to the overall assessment of genotoxicity and carcinogenicity.
Specific Comments	

Page 10, line 7	“hydrogen en carbon” should read “hydrogen and carbon.”
Page 22, line 35	“...mouse strain infected with the fungicide caplan”: Does it mean “mouse strain <i>exposed</i> to the fungicide <i>captan</i> ”? The study by Culp et al. mentions captan; not caplan.
Page 28, lines 8–14	Contains two sentences which, although worded slightly differently, appear to be almost completely repetitive.