

National Institute for Occupational Safety and Health (NIOSH)
Comments on the Interagency Science Discussion (Step 6)
Draft IRIS Toxicological Review of Hexavalent Chromium [Cr(VI)]
June 2024

Date: 06/27/2024

Comments pertaining to the Toxicological Review

Page 4-40, line 4 and footnote 78: the citations are inaccurate. The latest issue of NIOSH Method 7600 (Issue 3) was published in October 2015. At that time, the editors of the NIOSH Manual of Analytical Methods (NMAM) were KE Ashley and PF O'Connor. That year and those editors are the accurate entries for the citations.

Page 4-40, footnote 78 states that the document is a chapter. NMAM contains both methods and chapters. NIOSH suggests that the word "chapter" be revised to "method" because the reference is to a method, NIOSH Method 7600.

Comments pertaining to the reference section of the Systematic Review Protocol (Appendix A)

A 1994 version of NIOSH Method 7600 is cited on page R-7. A newer version (issue) of the method is available. Most recently, NIOSH Method 7600 (Issue 3) was published in 2015 as part of the NMAM 5th edition: [NMAM 7600: Chromium, Hexavalent \(cdc.gov\)](https://www.cdc.gov/niosh/methods/7600/). However, opting for an older version could have been intentional as this choice supports the fact that the NIOSH method has specified PVC filters for many years.

Page R-7 has two reference citations for the same NIOSH document, the NIOSH criteria document for hexavalent chromium. The reference citation for NIOSH 2013a contains the correct title and content. Throughout this document, the NIOSH 2013a and NIOSH 2013b in-text citations should be revised to NIOSH 2013. In the reference section, the citation for NIOSH (2013a) should be revised to NIOSH (2013) and the NIOSH (2013b) citation should be deleted. In the Toxicological Review document, this NIOSH document is correctly cited as NIOSH 2013.