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NIOSH Docket Office (CDC)


From: NanoReg.net [johnd@nanoreg.net]

Sent: Thu 2/14/2008 10:46 PM

To: NIOSH Docket Office (CDC)

Cc:

Subject: 115 - NIOSH Interim Guidance Nanoparticles

Attachments:  SOCMA Nano Coalition Comments on NIOSH Guidance Document (2-15-08).DOC(145KB)

Attached please find comments provided by the SOCMA Nanotechnology SME Coalition on the National Institute for Occupational Safety and Health (NIOSH) *Draft Current Intelligence Bulletin: Interim Guidance on Medical Screening of Workers Potentially Exposed to Engineered Nanoparticles*.

The Coalition appreciates this opportunity to offer its comments, and urges NIOSH to take into account the information provided in these comments. If there are further questions regarding the Coalition's comments, please contact the undersigned.

John DiLoreto

Executive Director

SOCMA Nanotechnology SME Coalition

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February 15, 2008

via - nioshdocket@cdc.gov
Docket Number: NIOSH-115

NIOSH Docket Office
Robert A. Taft Laboratories
4676 Columbia Highway, MS C-34
Cincinnati, OH 45226

Subject: Comments in Response to NIOSH Draft Current Intelligence Bulletin: Interim Guidance on Medical Screening of Workers Potentially Exposed to Engineered Nanoparticles, Docket #NIOSH-115

The Nanotechnology SME Coalition, an affiliate of the Synthetic Organic Chemical Manufacturers Association, is providing comments on the National Institute for Occupational Safety and Health (NIOSH) *Draft Current Intelligence Bulletin: Interim Guidance on Medical Screening of Workers Potentially Exposed to Engineered Nanoparticles*.

The Nanotechnology SME Coalition (Coalition) membership includes start-ups, small- and medium-size enterprises (SME), and other companies engaged in the commercial production, development, distribution, and/or use of chemicals with business interests in the products and applications of nanotechnology.

The Coalition appreciates the opportunity to provide these comments on the interim guidance document and, in general, the efforts by NIOSH to provide a better understanding of issues related to workers with a potential exposure to engineered nanoparticles.

The Coalition generally concurs with the NIOSH characterization of a medical surveillance program. It contains all of the basic elements of any program for the monitoring of worker exposures. Used appropriately, it can be an effective element in the regimen of controls typically employed by safety and health professionals in the workplace.

Producers and users of engineered nanoparticles are encouraged to implement controls to minimize worker exposure. All due precautions are encouraged to protect workers and organizations are urged to implement a plan which would be dynamic enough to allow adjustments to be made to controls as indicated by new data.

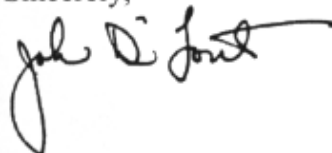
As indicated in the document, it is difficult to assess medical conditions without a better understanding of the toxicology of a substance. As indicated in the document, "specific endpoint(s) must be known to allow for test selection." Thus, medical screening will have little value for engineered nanoparticles until more specific endpoint data are available.

The Coalition is encouraged by NIOSH's draft guidance as it reflects an ongoing effort to fully characterize the traditional hierarchy of controls for engineered nanoparticles. At this time, a focus on hazard surveillance and risk management are the keys to a successful program to control worker exposures. As additional data on the possible hazards of engineered nanoparticles become available, medical screening may become an important tool in worker safety programs.

The Coalition acknowledges the excellent work by NIOSH in conducting field investigations which are valuable in establishing potential workplace exposures and identifying appropriate measures to control exposure to engineered nanoparticles.

The Coalition appreciates this opportunity to offer its comments, and urges NIOSH to take into account the information provided in these comments. If there are further questions regarding the Coalition's comments, please contact the undersigned.

Sincerely,

A handwritten signature in black ink, appearing to read "John DiLoreto". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

John DiLoreto
Executive Director
Nanotechnology SME Coalition