



AMERICAN COLLEGE OF  
OCCUPATIONAL AND  
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**Comments of the American College of Occupational and Environmental Medicine**

**National Institute of Occupational Safety and Health Request for Information: Update  
of NIOSH Nanotechnology Strategic Plan for Research and Guidance (NIOSH 134-A)**

**Submitted April 18, 2011**

The following comments are submitted by the American College of Occupational and Environmental Medicine (ACOEM) in response to NIOSH's request for information regarding updating the Strategic Research Plan for Nanotechnology Research and Guidance. These comments were developed by members of the Lung Disorders Committee of ACOEM

Although the Strategic Plan is for research for all types of nanomaterials, ACOEM's response of February 18, 2011, to the Draft CIB "Occupational Exposure to Carbon Nanotubes and Nanofibers" is still relevant for all classes of nanomaterials in that it remains unclear as to the potential health effects of any of these materials for workers who are involved in production.

1. In our comments to the Draft CIB ACOEM recommended that NIOSH initiate at least one prospective cohort study with close follow-up of exposed individuals in order to determine as soon as possible whether occupational exposures are associated with adverse health effects and if so, what effects occur. If such a study is also undertaken in order to detect or characterize exposures, in addition to determining adverse health effects, then it is critical that the validity of monitoring methods be separately demonstrated.
2. It is strongly recommended that multiple worker cohort studies be conducted with different nanomaterials given the potential difference in toxicity for one form of nanoparticles from another form.
3. NIOSH should continue to seek collaborations with organizations that are involved in the production of nanomaterials for the purpose of health and hazard surveillance. One example given was the Brookhaven National Laboratory (and other Nanoscale Science Research Centers) of the Department of Energy. The Occupational Medicine Clinic and the Safety and Health Services Division at these locations have developed guidance for the handling of nanoparticles and suggested medical testing for exposed workers.