

Dragon, Karen E. (CDC/NIOSH/EID)

From: john.muller@med.navy.mil
Sent: Monday, January 14, 2008 4:04 PM
To: NIOSH Docket Office (CDC)
Cc: Chen, Jihong (Jane) (CDC/NIOSH/EID) (CTR); Doyle, Glenn (CDC/NIOSH/EID)
Subject: 115 - TDSH Comments

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Comments

(In reference to docket number NIOSH-115) Overall, I thought the document was excellent.

As far as requirements for surveillance, have you considered adding an additional "uncertainty factor" for nanoparticles?

If asbestos/cadmium/dust/substance X have action levels of A/B/C/D triggering surveillance, would it be reasonable to use action levels one-half to one-tenth of A/B/C/D when those same substances are nanoparticles?

For example, respirable particulates of otherwise-non-toxics have a limit of 5 mg/m³. If that same particulate is an intentionally-manufactured nano-particle, set the limit to between 0.5 - 2.5 mcg/m³ until data indicate otherwise. Likewise, the cadmium dust action level is 2.5 mcg/m³; when cadmium is an intentionally-manufactured nano-particle, set the action level at 1.25 to 0.25 mcg/m³.

Also, it occurs to me that many of the nanoparticle research will be done by personnel generally unfamiliar with occupational hazard control and PPE (university grad students and professors). Has NIOSH planned any sort of outreach to that population?