

Miller, Diane M. (CDC/NIOSH/EID)

From: Bill Kojola [Bkojola@afcio.org]
Sent: Monday, June 02, 2008 9:41 AM
To: NIOSH Docket Office (CDC)
Subject: Docket Number NIOSH-134 Comments

Attachments: Comments NIOSH Strategic Plan.pdf



Comments NIOSH
Strategic Plan....

Dear NIOSH:

Attached find comments we wish to submit to docket number NIOSH-134 regarding the draft "Strategic Plan for NIOSH Nanotechnology Research and Guidance".

Thank you for the opportunity to provide our views.

Sincerely,

Bill Kojola

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June 1, 2008

Dr. Paul Schulte
Coordinator
NIOSH Nanotechnology Research Center
4676 Columbia Parkway
Cincinnati, Ohio 45226

**RE: Strategic Plan for NIOSH Nanotechnology Research and Guidance
Docket Number NIOSH-134**

Dear Dr. Schulte:

We appreciate the opportunity to provide comments on the draft document, *Strategic Plan for NIOSH Nanotechnology Research and Guidance*. While nanotechnology is a rapidly developing area that holds promise for benefits to society, it is also vitally important that research issues related to the occupational health and safety of engineered nanomaterials be aggressively addressed. The health and safety of workers exposed to these nanomaterials depends on it. Thus it is important for NIOSH to develop a strategic plan to guide both its short and long term goals and objectives so that workers are protected.

In reviewing the draft strategic plan, we'd like to offer the following comments and suggestions that we believe will assist NIOSH in strengthening its plan.

- NIOSH's ability to conduct research on nanotechnology and achieve its strategic goals ultimately depends upon the resources it has available for doing so. At the present time, NIOSH is receiving no additional funding to conduct research in this area and instead has re-programmed a small amount of existing research funds for conducting this work. We believe that the existing funding level is insufficient for carrying out the work that is necessary and the report should acknowledge this fact.
- Given the resource limitations, we suggest that NIOSH prioritize the intermediate goals it has identified within the 10 critical research areas and identify those goals (or elements of those goals) it can accomplish given the current funding level. The plan should then list/prioritize those intermediate goals that it cannot currently afford to do given those limitations. By making this critical distinction, NIOSH lends a measure of reality to its choices for the research that it will actually conduct rather than generate a wish list of projects that bear no connection to the resources it has available.
- As to future funding levels, this document is vague and not instructive as to what plans and actions NIOSH might consider undertaking to secure

additional funding for its nanotechnology projects. To us, a strategic plan ought to include some discussion of this topic.

- We believe the plan needs to include more emphasis on field work, including identifying the users of engineered nanomaterials, who is exposed, levels of exposure, and interventions that are reducing/eliminating exposures in the field.
- The plan ought to include more active surveillance projects. This work is very important for assessing the health impact upon workers who are exposed to these materials.
- The plan should stress research that focuses on the assessment of exposures and identification of effective control measures covering the complete lifecycle of nanomaterials, including non-routine events such as cleaning, maintenance, and process upsets. Activities throughout the lifecycle, including discarding and demolition for example, could add significantly to worker exposure.
- The plan needs to emphasize the importance of developing exposure sampling devices for routine use by industrial hygienists in the field. This work is a core fundamental need for the worker safety and health community.
- The plan should outline the role that NIOSH intends to play with OSHA regarding the health and safety issues of nanotechnology and what NIOSH will do to assist OSHA in taking action on nanotechnology (guidelines, fact sheets, etc.).
- NIOSH should more fully describe what it intends to do to go beyond information dissemination to assist in assuring that interventions and protective measures are being implemented in the field.

We're pleased that NIOSH is moving forward with developing its nanotechnology research strategic plan. We hope that our comments will help to improve the final document.

Bill Kojola, Industrial Hygienist
AFL-CIO

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International Union, UAW

Dave Ortlieb, Assistant Director
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