

You replied on 2/15/2008 10:24 AM.

**NIOSH Docket Office (CDC)**

**From:** Wambach, Paul [Paul.Wambach@eh.doe.gov] **Sent:** Fri 2/15/2008 9:50 AM  
**To:** NIOSH Docket Office (CDC)  
**Cc:** Richter, Bonnie; Strader, Cliff  
**Subject:** Comments on NIOSH Docket # 115 - NIOSH Interim Guidance on Nanoparticles  
**Attachments:**

Docket Office:

On behalf of the Department of Energy, Office of Health and Safety, I am responding to your request for public comments on the draft "Current Intelligence Bulletin: Interim Guidance for the Medical Screening of Workers Potentially Exposed to Engineered Nanoparticles" dated November 2007 posted at

<http://www.cdc.gov/niosh/updates/upd-12-13-07.html>. The Office is highly supportive of the publication of this interim guidance. There are a range of opinions on whether medical surveillance of nanotechnology workers is needed. The Bulletin provides well reasoned guidance on measures that should be taken at this early stage of engineered nanomaterial research, development and production. Its publication is an important step in creating consensus on the subject.

We offer one suggestion as a possible improvement for the document. Section 3.1 lists the elements of a medical surveillance program. We suggest adding a new subsection that summarizes the full scope of occupational medicine practice. The placement, return to work, emergency aid, case management, wellness and other functions of an occupational medicine program create patient encounters and the collection of health information. As in public health surveillance that makes use of information collected as a result of patients seeking medical assistance, data resulting from providing these occupational medicine services can be used for surveillance. There is a reasonable expectation that employers who offer these services will collect information on diagnoses of both occupational and non-occupational illnesses and injuries that cause significant lost time or that require an accommodation in the workplace. This information can play a valuable role in the broader assessment of potential health effects associated with the workplace.

The American College of Occupational and Environmental Medicine position statement "Scope of Occupational and Environmental Health Programs and Practice" would be a useful reference for a summary of all occupational medicine elements. The document is posted at <http://www.acoem.org/guidelines.aspx?id=736>.

Thank you for the opportunity to offer comments.

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