

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

---

**From:** David B Warheit [David.B.Warheit@USA.dupont.com]  
**Sent:** Friday, February 15, 2008 5:35 PM  
**To:** NIOSH Docket Office (CDC)  
**Subject:** RE: 115 - NIOSH Interim Guidance Nanoparticles - DuPont comments

yes it is ok to publish - Diane

David

"NIOSH Docket Office (CDC)" <niocindocket@cdc.gov>

To David B Warheit/AE/DuPont@DuPont

cc

02/15/2008 05:20 PM

Subject RE: 115 - NIOSH Interim Guidance Nanoparticles - DuPont comments

**I noticed the confidentiality statement at the bottom of your email. Is it OK to post this submission on the NIOSH website?**

Diane M. Miller  
NIOSH Docket Officer  
513/533-8450  
[dmm2@cdc.gov](mailto:dmm2@cdc.gov)

---

**From:** David B Warheit [mailto:David.B.Warheit@USA.dupont.com]  
**Sent:** Friday, February 15, 2008 3:36 PM  
**To:** NIOSH Docket Office (CDC)  
**Cc:** David B Warheit  
**Subject:** 115 - NIOSH Interim Guidance Nanoparticles - DuPont comments

To: NIOSH

From: David B. Warheit, Ph.D. - DuPont Haskell Global Centers for Health and Environmental Sciences

**Comments on the DRAFT Current Intelligence Bulletin (CIB): Interim Guidance on Medical Screening of Workers Potentially Exposed to Engineered Nanoparticles**

After reviewing the "NIOSH Current Intelligence Bulletin (CIB): Interim Guidance For the Medical Screening of Workers Potentially Exposed to Engineered Nanoparticles", we believe that the principles and intent as presented within the Current Intelligence Bulletin are appropriate

2/21/2008

considerations for a proactive Occupational Health Surveillance program demonstrating responsible product stewardship involving the engineered nanoscale materials. The main focus of the document appears to address the question whether additional medical screening is warranted for workers potentially exposed to engineered nanoparticles. As stated within the guidance document, "the current body of evidence about the possible health risks of occupational exposure to engineered nanoparticles is quite small. Insufficient scientific and medical evidence now exists to recommend the specific medical screening of workers potentially exposed to engineered nanoparticles." The feasibility and merit of conducting meaningful additional medical screening is dependent upon identification of specific disease endpoints and we support the efforts by NIOSH to establish such facts.

We advocate placing emphasis on minimizing exposure, greatly reducing the potential emphasis on future medical screening for materials where the hazards are low. We believe that emphasis should be placed on understanding hazards, controlling exposure, and minimizing risks up front rather than using medical surveillance "to help assess whether control measures are effective".

NIOSH continues to address research findings relative to specific disease endpoints for nanoscale materials and correspondingly advance occupational health surveillance measures for materials with demonstrated significant health hazards, which include hazards surveillance - assessments and medical surveillance - screening efforts. We are in alignment with their process for providing guidance on medical screening for materials with demonstrated significant health hazards as well as their recommendations for workplace safety, health and environmental stewardship.

This communication is for use by the intended recipient and contains information that may be Privileged, confidential or copyrighted under applicable law. If you are not the intended recipient, you are hereby formally notified that any use, copying or distribution of this e-mail, in whole or in part, is strictly prohibited. Please notify the sender by return e-mail and delete this e-mail from your system. Unless explicitly and conspicuously designated as "E-Contract Intended", this e-mail does not constitute a contract offer, a contract amendment, or an acceptance of a contract offer. This e-mail does not constitute a consent to the use of sender's contact information for direct marketing purposes or for transfers of data to third parties.

Francais Deutsch Italiano Espanol Portugues Japanese Chinese Korean

[http://www.DuPont.com/corp/email\\_disclaimer.html](http://www.DuPont.com/corp/email_disclaimer.html)

This communication is for use by the intended recipient and contains information that may be Privileged, confidential or copyrighted under applicable law. If you are not the intended recipient, you are hereby formally notified that any use, copying or distribution of this e-mail, in whole or in part, is strictly prohibited. Please notify the sender by return e-mail and delete this e-mail from your system. Unless explicitly and conspicuously designated as "E-Contract Intended", this e-mail does not constitute a contract offer, a contract amendment, or an acceptance of a contract offer. This e-mail does not constitute a consent to the use of sender's contact information for direct marketing purposes or for transfers of data to third parties.

Francais Deutsch Italiano Espanol Portugues Japanese Chinese Korean

[http://www.DuPont.com/corp/email\\_disclaimer.html](http://www.DuPont.com/corp/email_disclaimer.html)