

Recognize, Evaluate, Control



Baytubes® Carbon Nanotubes
Safe Handling Guidelines



Lots of Questions for Occupational Health!



- What is a safe exposure limit?
- How to I measure employee exposure?
- Should I treat nanowaste as hazardous waste?
- Should I offer medical exams for my employees?
- Should I filter my exhaust stack effluent?
- Do respirators and other filters work for nanoparticles?
- What should I tell people who handle nanoparticles?



Exposure Limits

Proposed OELs for Nanoparticles



Table 2 Proposed OELs for engineered nanoparticles

Nanomaterial	Parameter	OEL	References
General	0.004% risk level	Mass-based OEL: 15	OECD (2008)
Titanium dioxide	0.1 risk level particles < 100 nm	0.1 mg/m ³	NIOSH (2005)
General dust		3 mg/m ³	BAuA (2009)
Photocopier Toner	Tolerable risk	0.6 mg/m ³	BAuA (2008b)
	2009 acceptable risk	0.06 mg/m ³	
	2018 acceptable risk	0.006 mg/m ³	
Biopersistent granular materials (metal oxides, others)	Density > 6,000 kg/m ³	20,000 particles/cm ³	IFA (2009)
Biopersistent granular materials	Density < 6,000 kg/m ³	40,000 particles/cm ³	IFA 2009
CNTs	Exposure risk ratio for asbestos	0.01 f/cm ³	IFA (2009)
Nanoscale liquid		Mass-based OEL	IFA (2009)
Fibrous	3:1; length 75,000 nm	0.01 f/cm ³	BSI (2007)
CMAR ^a		Mass-based OEL: 10	BSI (2007)
Insoluble	Not fibrous	Mass-based OEL: 15	BSI (2007)
Soluble	Not fibrous	Mass-based OEL: 10	BSI (2007)
	Not CMAR		
MWCNT	Bayer product only	0.05 mg/m ³	Bayer (2010)
MWCNT	Nanocyl product only	0.0025 mg/m ³	Nanocyl (2009)

^a Carcinogenic, mutagenic, asthmagenic, and reproductive toxicants

Carbon Nanotubes?



- Graphite standard (OSHA): 5000/15000 $\mu\text{g}/\text{m}^3$ averaged over an 8 hour day– clearly not appropriate
- Graphite Standard (ACGIH) : 2000 $\mu\text{g}/\text{m}^3$ averaged over an 8 hour day– clearly not appropriate
- Carbon Black (ACGIH): 3500 $\mu\text{g}/\text{m}^3$ – clearly not appropriate
- Bayer (Baytube: MWCNT) Corporate Standard: 0.05 mg/m^3 *
- Nanoctyl MWCNT Corporate Standard: Standard: 0.0025 mg/m^3
- Pending NIOSH MWCNT proposal: 0.007 mg/m^3 (based on limit of ability to measure)
- Asbestos Standard (OSHA-Optical): 0.1 fiber/cc
- Asbestos Standard (EPA-PCM): 0.01 fibers /cc
- Asbestos Standard (EPA-TEM): 0.02 structures/cc
- Molecular Foundry: Background--No exposure permitted

* For Bayer's "short-tangled" and thus "low toxicity" MWCNTs. Implication is that this standard may be inadequate for longer/thicker/less tangled and thus potentially more toxic MWCNTs



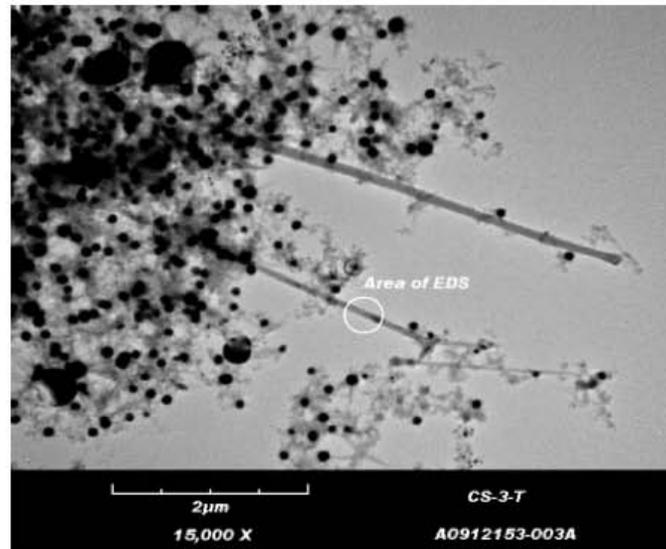
Where do Exposures Occur?

Industrial Exposures (NIOSH)



← Harvesting SWCNT's from a Carbon Arc Reactor

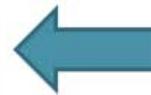
Task-based PBZ air sample analyzed via TEM w/ EDS →



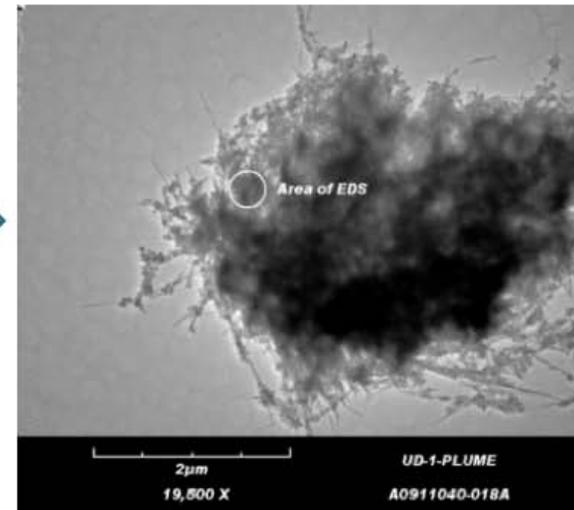
Limitation of Wet Methods



Droplet plume deposition onto unprotected skin during wet saw cutting of CNF composite



TEM of droplet plume emitted from diamond saw blade during wet saw cutting of CNF



Do Exposures Occur in Labs?

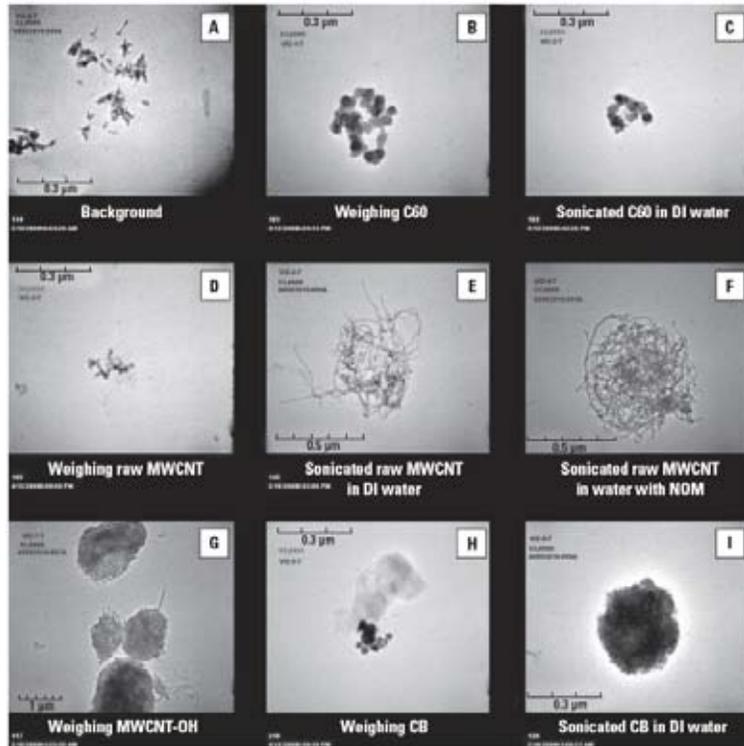
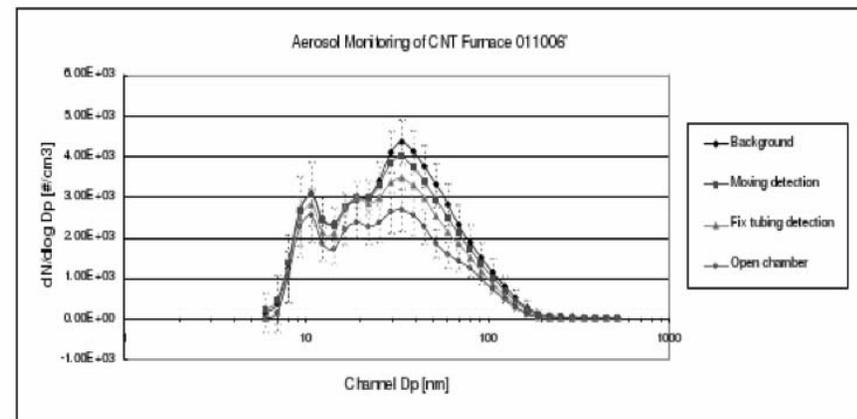


Figure 3. TEM images of engineered CNMs during laboratory processes. (A) Background air sample; bar = 0.3 μm . (B) Weighing/transferring C60 inside hood with no ventilation; bar = 0.3 μm . (C) Sonicating C60 in DI water inside unventilated enclosure; bar = 0.3 μm . (D) Weighing/transferring raw MWCNT inside hood with no ventilation; bar = 0.3 μm . Note that no tubular structures are present. (E) Sonicating raw MWCNT in DI water inside unventilated enclosure; bar = 0.5 μm . (F) Sonicating raw MWCNT in reconstituted water containing 100 mg/L (parts per million) NOM inside unventilated enclosure; bar = 0.5 μm . (G) Weighing/transferring MWCNT-OH inside hood with no ventilation; bar = 1 μm . (H) Weighing/transferring CB inside hood with no ventilation; bar = 0.3 μm . (I) Sonicating CB in DI water inside unventilated enclosure; bar = 0.3 μm .

✓ Several reports in the literature of researchers being exposed during manufacturing, harvesting and handling of CNTs

Air Monitoring for Carbon Nanotubes Around Furnace During Growth and Purge Cycles (at MIT Lab)



From Marylin Hallock, MIT

From A. Maynard, NIOSH

NIOSH Findings



Examples of NIOSH field investigations: basic metrics			
Type of Facility	Type of Particle, Morphology	Size of Particle	Range of "Potential" Exposure Concentrations
University Research lab	Carbon Nanofibers	Approx. 100 nm diameter, 1–10 microns long	60-90 $\mu\text{g}/\text{m}^3$ Total Carbon
Metal Oxide Manufacturer	TiO ₂ , Lithium Titanate, powder	100–200 nm	<100 nm: 1.4 $\mu\text{g}/\text{m}^3$ (TiO ₂) Total dust: 4-149 $\mu\text{g}/\text{m}^3$ (TiO ₂) <100 nm: ND (Li) Total dust: ND -3 $\mu\text{g}/\text{m}^3$ (Li)
Manufacturer	Carbon Nanofibers	Approx. 100 nm diameter, 1–10 microns long	15 - 1800 $\mu\text{g}/\text{m}^3$ Total carbon
Research and Development lab	Quantum Dots, spheres	2–8 nm	ND
Metal Oxide Manufacturer	Manganese, Silver, Nickel, Cobalt, Iron oxides, spheres	8–50 nm	67 - 3619 $\mu\text{g}/\text{m}^3$ Mg, Ag, Ni, Co, Fe
Research and Development lab (Pilot-Scale)	Aluminum, spheres	50–100 nm	40 - 276 $\mu\text{g}/\text{m}^3$ Al
Research and Development lab	Elemental metals: Silver, copper, TiO ₂	15–40 nm	ND
Filter Media Manufacturer	Nylon 6 Nanofiber	70–300 nm diameter, continuous length	ND



Measuring Exposures

How to I measure employee exposure?



- Minimally, use a direct reading instrument to measure airborne nanoparticle level--
 - IPA CNC laser scattering photometer
 - not chemistry or size specific, measures particles from 10-3000 nm
 - Reads in units of particles/cc
 - High background limits sensitivity
- Use “surface” area meter, nothing to compare results to, better suited for things like metal oxides, where catalysis of ROS is the main tox driver
 - reads in units of $\mu\text{m}^2/\text{cc}$
- Very expensive particle size selective direct reading instruments, e.g. SMPS (\$60K+) p/cc
 - Research tools only



TSI 3007

TSI surface area meter



Metals and Metal Oxides



- **Use traditional filter collection and elemental analysis**
- **Use size selective sampler**
 - Cyclone
 - Cascade impactor
- **Not very useful for short duration operations of the type found in labs, maybe better in a factory setting**
- **Sensitivity varies and may not be adequate**

CNTs: Use Residual Metal Catalyst as a Surrogate



- Characterize residual metal concentration in bulk
- Measure worker airborne exposure to that metal via filter sampling and ICP or AA analysis
- Back-calculate CNT exposure
- **Example**
 - Measure 1.0 mg/m³ of iron catalyst in air sample
 - Catalyst is present at 10% in the CNT
 - CNT exposure = 1.0 mg/m³ x 100%/10% = 10 mg/m³

NIOSH's Approach



Micro meter

Low micro + nano meter



Some degree of size specificity can be had by using a micro particle meter and a nano particle meter in parallel (NIOSH)

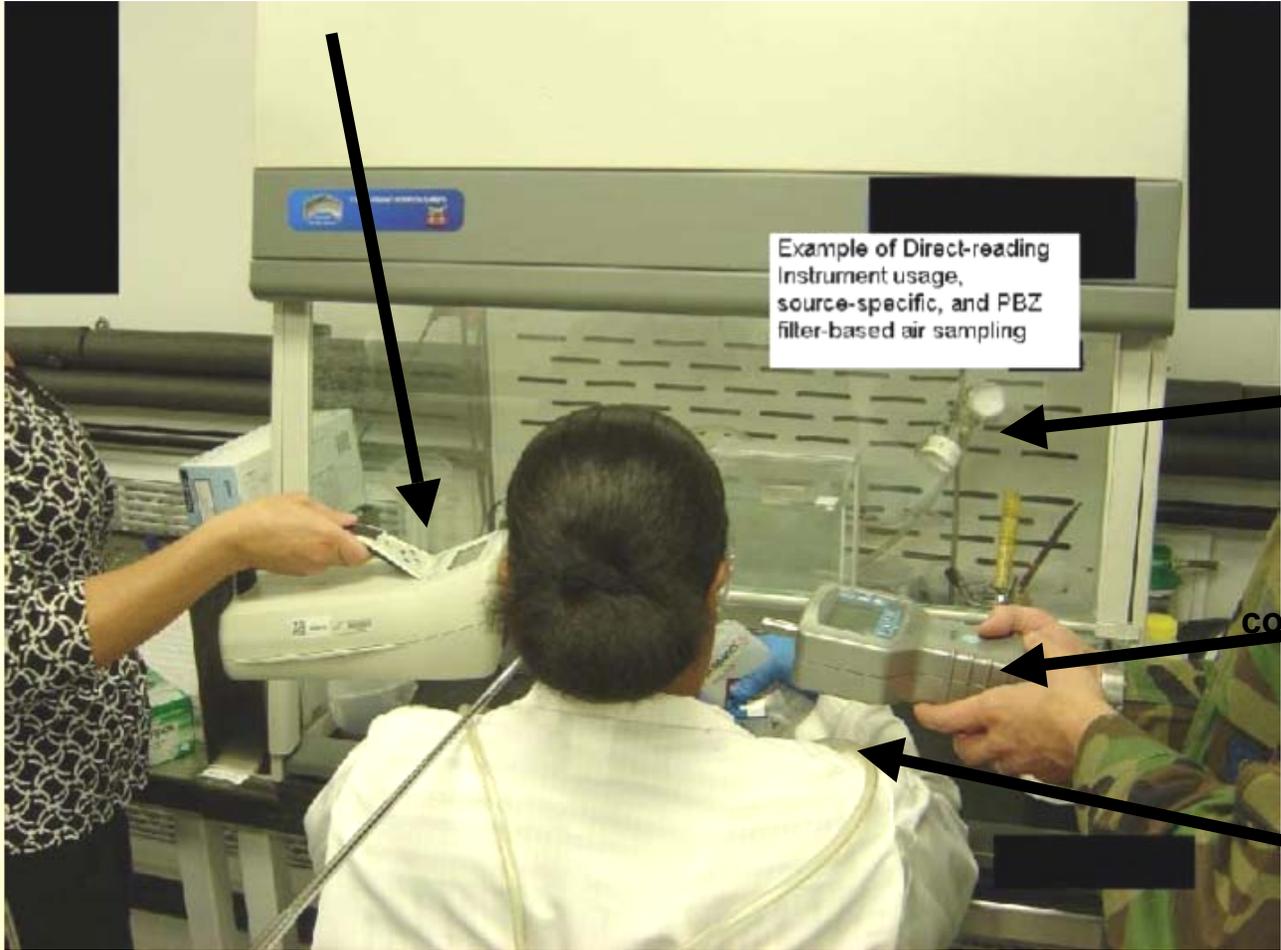
Filter collection for metal analysis or TEM analysis

Looking for levels 25% above background with the direct reading instruments

NIOSH's Approach



10-3000 nm meter



Example of Direct-reading
Instrument usage,
source-specific, and PBZ
filter-based air sampling

Filter
sample at "source"
for TEM analysis

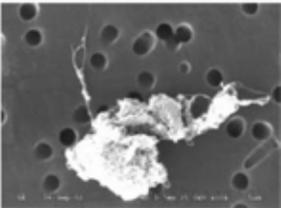
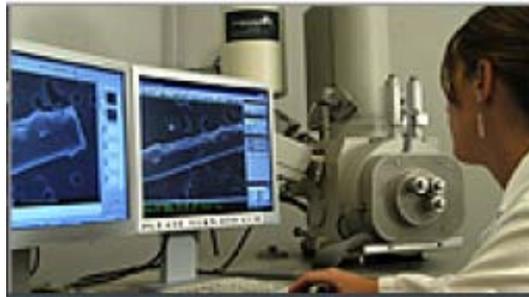
μ m scale particle
counter

BZ filter
collection for TEM
analysis

Filter Sampling/TEM Analysis



Examples of Sampling Strategy

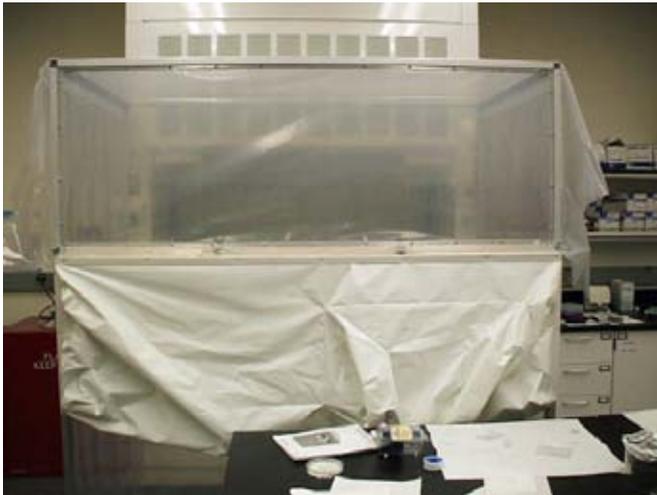


- Allows differentiation of ENP from background UFP
- Allows characterization of size, agglomeration, chemistry
- EXPENSIVE!

LBL: Eliminate Background UFP Interference



- We use zero background techniques to measure exposure to engineered nanoparticles
- This is a bottomless glovebox or hood antechamber with HEPA filtered air supply
- Run filtered fan to fill glovebox with particle-free air
- Repeat nano operation, while monitoring with direct reading instrument
- ~500x better sensitivity



- If nothing detected, operation allowed to proceed without modification
- If exposure detected, work must be altered to eliminate exposure
- 80% of the time we don't see anything



Disposal of Waste Nanoparticles

Should I treat Nanoparticle-Containing Waste as Hazardous



- **Not *explicitly* required under federal or California law**
 - Although EPA rules now require some non-research users of CNTs to ensure that CNTs don't end up in US waterways
- **DOE Consensus--Treat all waste containing engineered nanoparticles as if it were hazardous unless it **ABSOLUTELY** isn't (e.g. cured composite plastic with CNTs might not be treated as hazardous)**
- **Don't *call* it hazardous, just treat it as if it *were* hazardous**



In UK, CNTs are Classified as Hazardous Waste



Health and Safety
Executive

Risk management of carbon nanotubes

Waste

The Environment Agency advises that this type of waste carbon nanotube material should be classified and coded as hazardous waste. Based on current information, they consider high temperature incineration at a hazardous waste incinerator as the preferred disposal method. Other technologies may be suitable if you can demonstrate that they render the wastes safe. CNT waste should be double-wrapped in sealed polythene bags. Pyrolysis above 500°C will oxidise CNTs completely. The disposal facility should provide adequate documentation of the disposal conditions and incineration temperature.



Medical Surveillance or Monitoring

Should I offer Medical Exams for My Employees Exposed to Nanoparticles?



- No specific regulations
- No clear consensus, although many DOE labs now offer exams
- **LBNL offers CNT workers a baseline exam and periodic follow-up “asbestos” medical examinations**
 - Medical tests are of low sensitivity, radiation risk from chest x-ray, etc
- See NIOSH Guidance Document for more thoughts (referenced later)



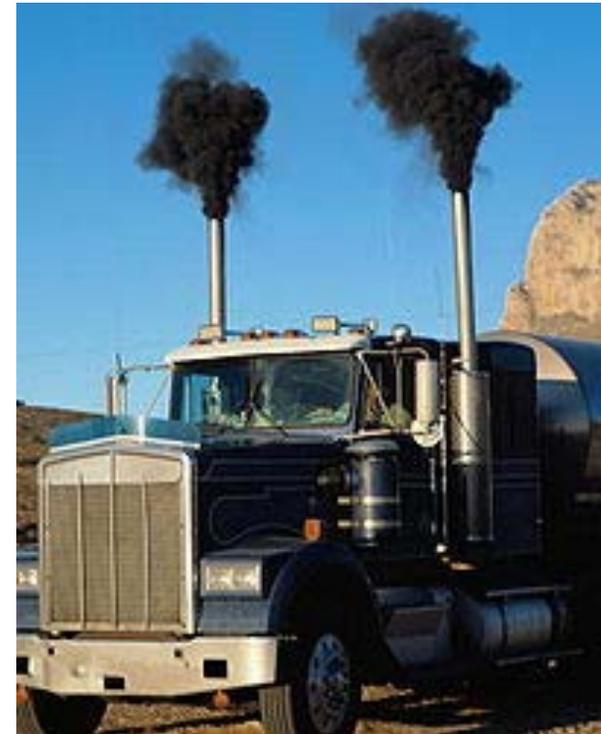


Effluent Scrubbing

Should I Filter/Scrub My Exhaust Stack CNT Effluent?



- No legal requirement to do so
- Highly contentious issue
 - Potential future liability
 - Community relations
 - Safety of maintenance workers
- Some companies are, some aren't



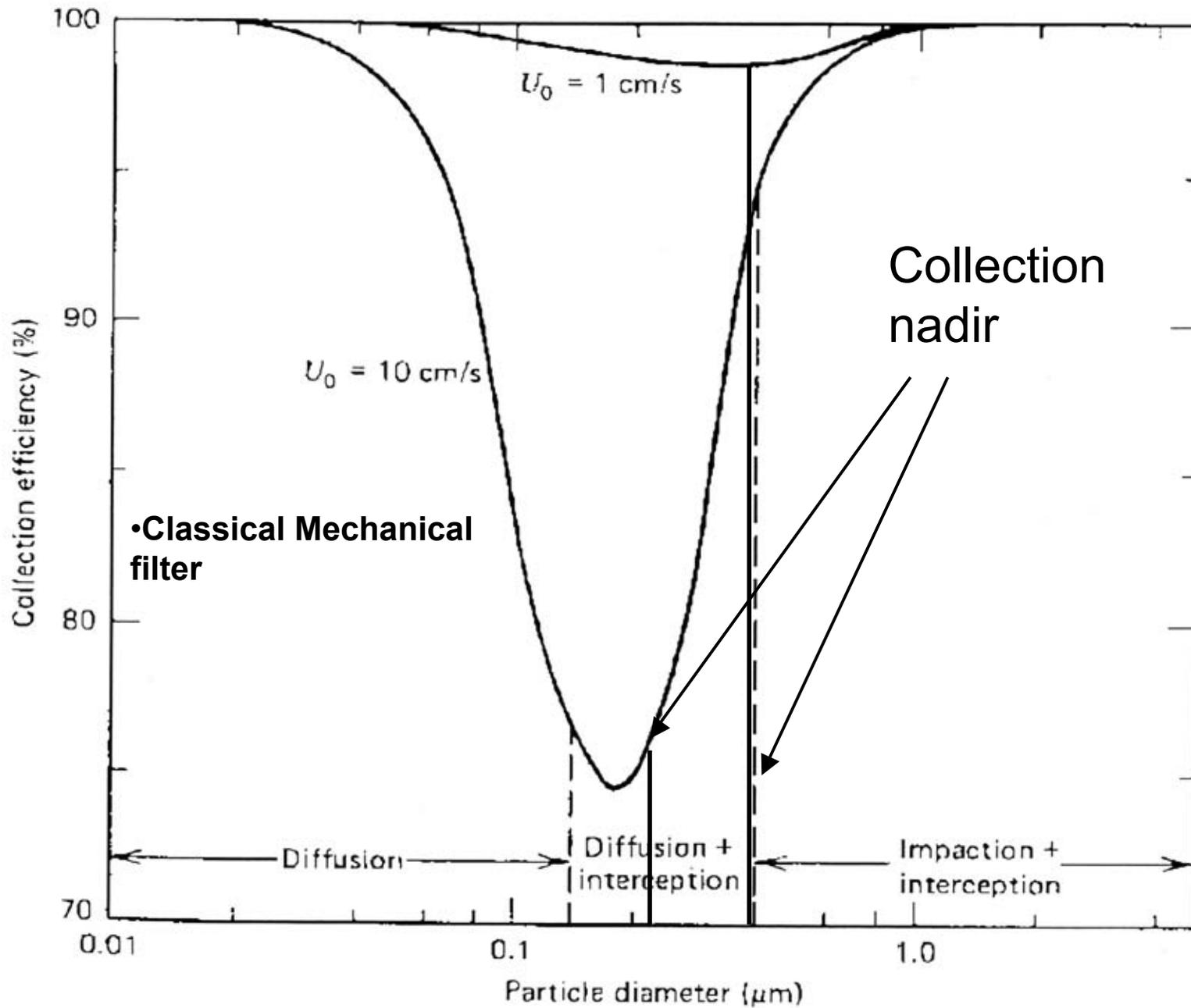


Engineered, Administrative and Personal Protective Controls

Will Safety Controls Work?



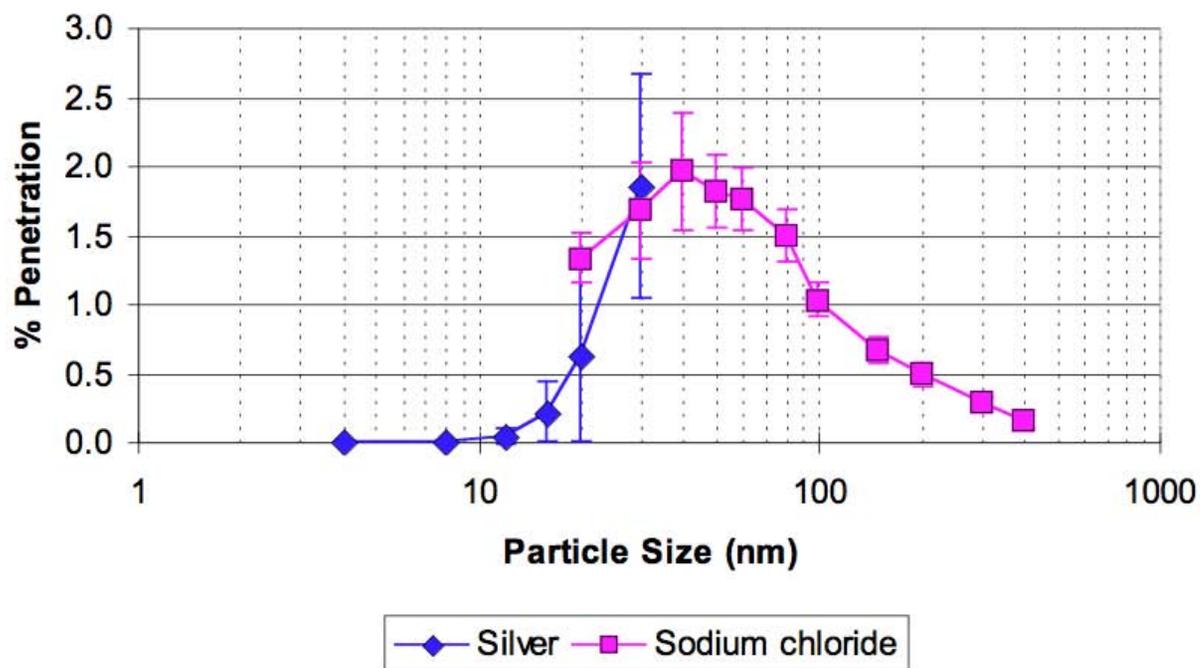
- **Will air filters remove nanoparticles from air with the expected efficiency?**
- **Will respirators work effectively against nanoparticles?**
- **Will ventilation systems capture nanoparticles as they do for larger particles?**
- **Will gloves and coveralls keep nanoparticles off of the skin?**



Do respirators and other filters work for nanoparticles?



Filtration Performance of a Typical NIOSH Approved N95 Filtering Facepiece Respirator



n = 5; error bars represent standard deviations
Sodium Chloride (TSI 3160); Silver (custom-built)
Flow rate 85 L/min

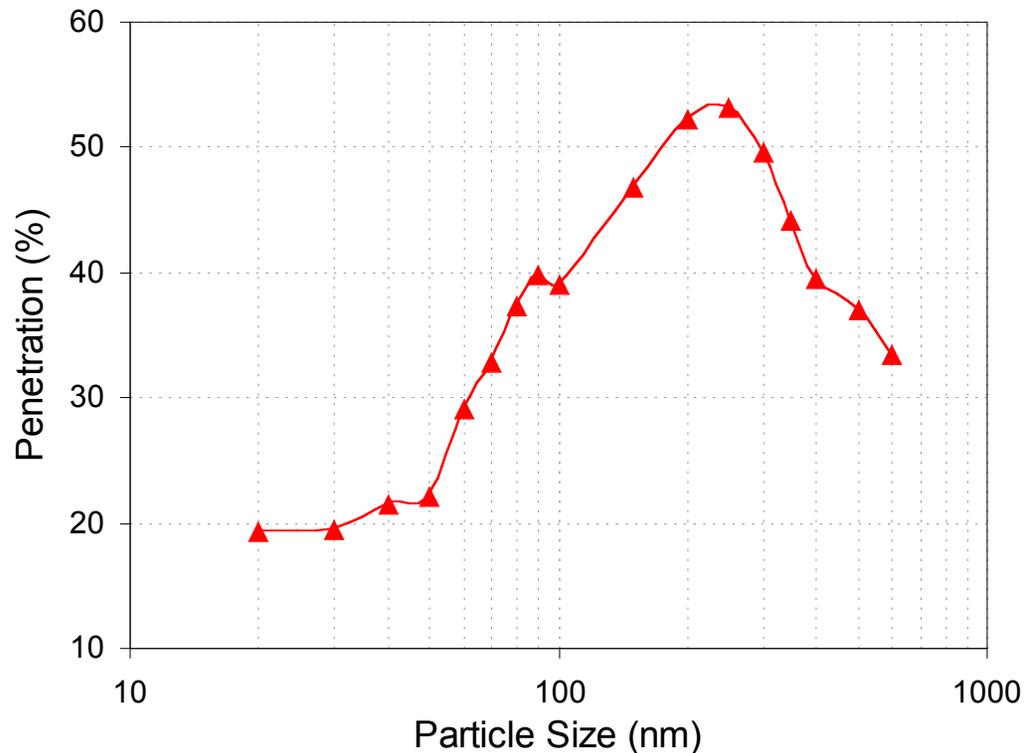
Filtration performance of NIOSH-approved N95 and P100 filtering facepiece respirators against nanoparticles, S. Rengasamy, WP King, B. Eimer and R. Shaffer, Journal of Occupational and Environmental Hygiene, In Press.

Summary : Percentage Penetration Results

Approval	Type	Polydisperse Aerosol Test (PAT) (%)	Monodisperse Aerosol Test (MAT) (%)	
			(40 nm)	(300 nm)
NIOSH	N95	0.61 - 1.24	2.0 - 5.2	0.20 - 1.56
NIOSH	P100	0.003 - 0.022	0.007-0.009	0.0006 - 0.001
CE	FFP2	0.27 - 0.50	1.45 - 2.22	0.69 - 0.84
CE	FFP3	0.009 - 0.014	0.155 - 0.164	0.06 - 0.07
FDA	Surgical Mask	1.58 - 88.06	8.98 - 72.51	2.14 - 88.95
N/A	Dust Mask	1.00 - 87.02	4.31 - 81.63	0.86 - 95.05

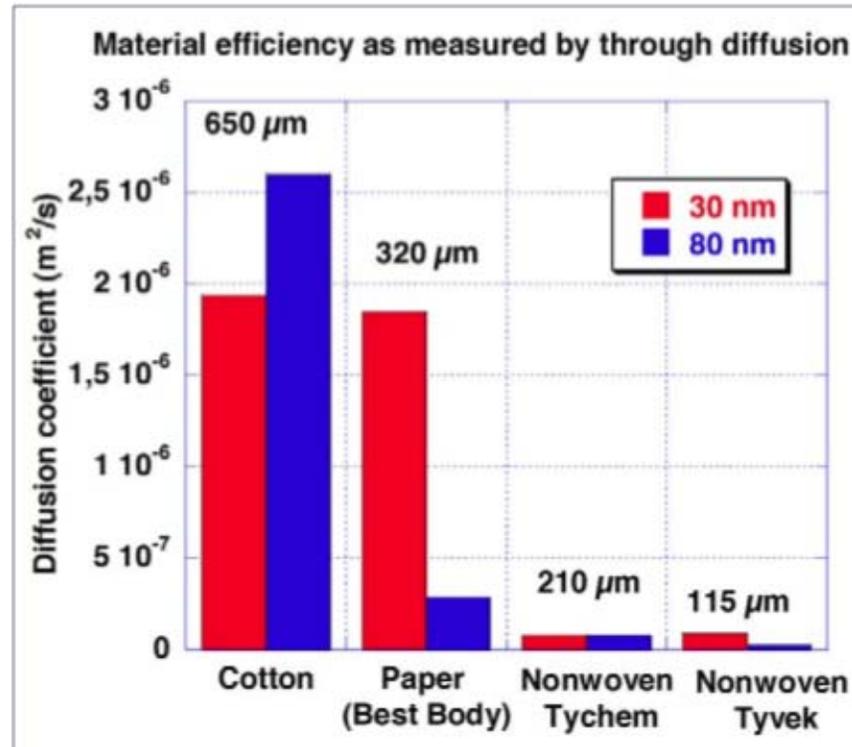
Particle Penetration Through Clothing

- Some fabric swatches behave like filter media
- Particle penetration driven by pressure differences
- Particle penetration is a function of the air permeability of the fabric
- FY09 NIOSH research project



*10 cm diameter circular swatch
Single layer of needle-punched Aramid material
TSI 3160; Face velocity = 0.63 cm/sec; Flow rate 1L/min*

Data from Nanosafe Consortium



Tests performed with graphite nanoparticles centred at 30 nm and 80 nm showed that high density polyethylene textile (Tyvek type) seems to be better than cotton and paper.

No Surprise: Nonbreathable materials are more impermeable to nanoparticles

Gloves

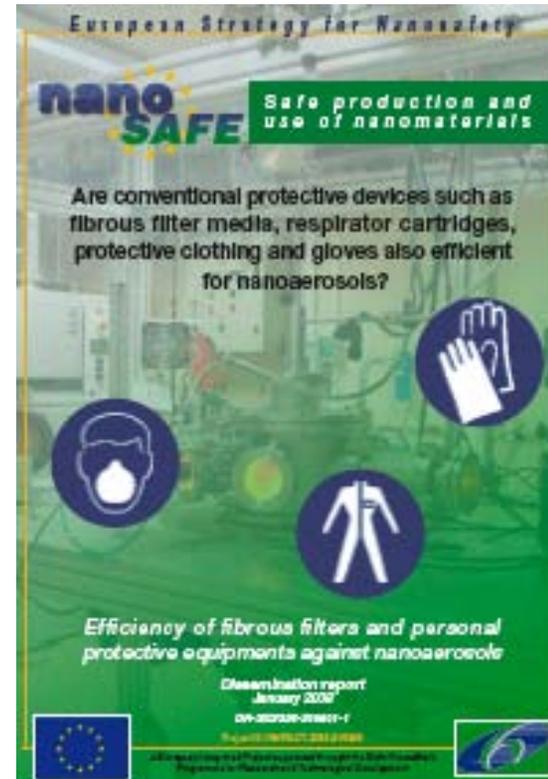
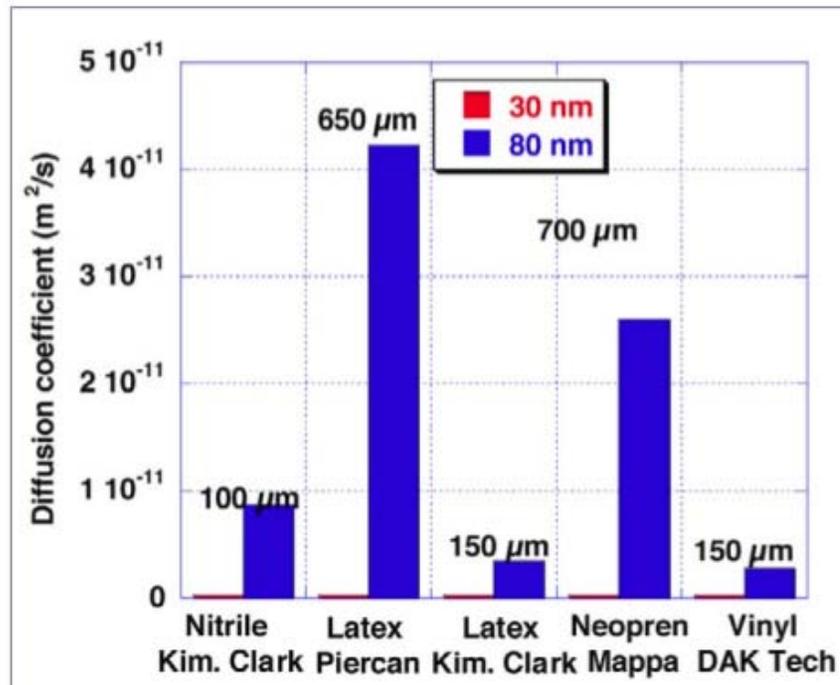


- **Glove contaminated with nanotubes**
- **Do gloves protect against nanoparticles?**

Nanosafe Glove Findings



IV. Gloves performances



Warning: Nanoparticles may penetrate through commercially available gloves!

Advice: Use at least 2 layers of gloves.

Glove Penetration-Early Study



Dermal and Respiratory Protection in Handling Nanomaterials at the Center for High-Rate Nanomanufacturing (CHN)

Kwangseog Ahn and Michael J. Ellenbecker
Toxics Use Reduction Institute
Department of Work Environment
The University of Massachusetts Lowell

Surface Pores/Intrinsic Voids of Protective Gloves

- Latex and nitrile gloves have intrinsic voids in the micrometer size range
 - The voids do not appear to be going through the glove creating holes and causing the gloves to leak
 - These voids, however, might be vulnerable to the penetration of nanoparticles if the gloves are used under unfavorable conditions, such as in an elongated state or under a severe wear and tear situation
 - In addition, nanoparticles may be treated with special coatings to enhance their dispersion characteristics
 - When those coating materials and glove material are in close contact, the chance of particle penetration could potentially be increased
 - There are wider gaps in between the cotton fibers in the cotton glove
-

Does Exhaust Ventilation Work?



Does Ventilation Work?



An Example from the Field

- **Average percent reduction from the use of a local exhaust ventilation unit was 96 +/- 6% based on particle counts and 88 +/- 12% based on mass**

portable fume hood extractor



During reactor cleanout activities



Effectiveness of Local Exhaust Ventilation (LEV) in Controlling Engineered Nanomaterial Emissions During Reactor Cleanout Operation, M, Methner, Journal of Occupational and Environmental Hygiene, Vol. 5, June 2008, pages D63 - D69.

Data and photos courtesy of Dr. Mark Methner, NIOSH Field Research Team.

This Backdraft Ventilation is not Completely Effective



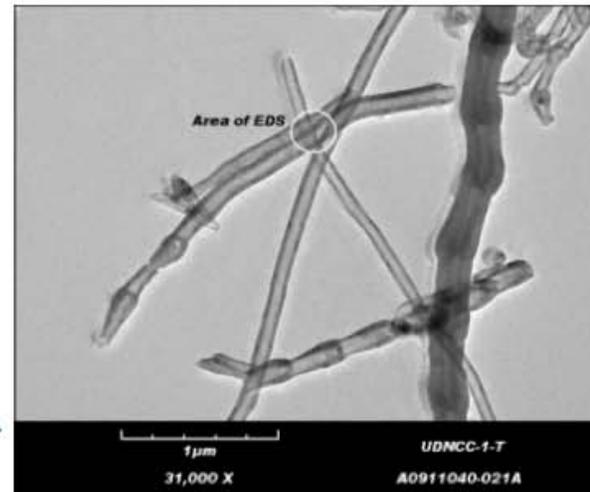
← Two methods of clean up – HEPA vacuum and Leaf Blower

← Darkened floor area due to grinding CNF into resilient floor tile with footwear



← Loading tray w/ CNF's

PBZ →

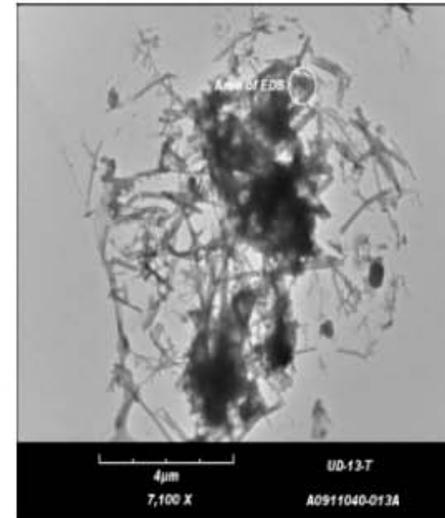


Poorly Designed Local Exhaust



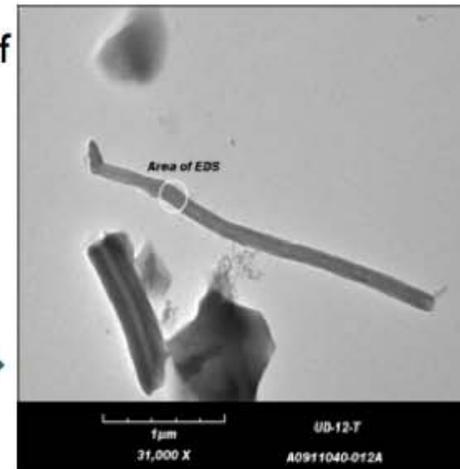
← Surface grinding of
CNF composite w/
LEV

PBZ during
surface grinding
w/ LEV →



← LEV inlet positioned 90
degrees from direction of
plume exiting wheel –
greatly reduced capture
efficiency

AS sample located just
above LEV inlet –
indicates less than
optimum capture →

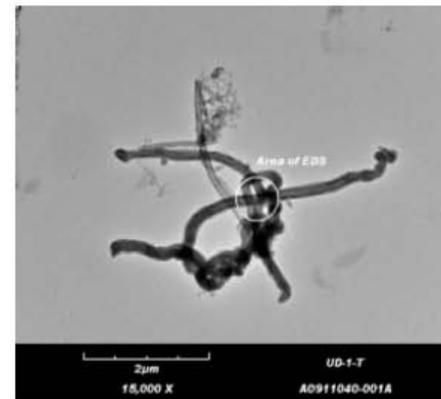


At This Scale, Fume Hood Not Completely Effective



Weighing CNF's
inside lab hood

PBZ indicates CNF's
reach breathing zone and
could escape and
contaminate adjacent
areas/entire lab



All Controls in Place



- Enclosure
- Ventilation
- Respirator
- Coveralls
- Gloves
- Air sampling

**All required by the
EPA!**

Fully Enclosed, Ventilated



Manufacturing containment



Courtesy of
Nanocomp
Technologies, Inc.

Fully Enclosed, Ventilated



Courtesy of Nanocomp Technologies, Inc.

Limitations on Controls



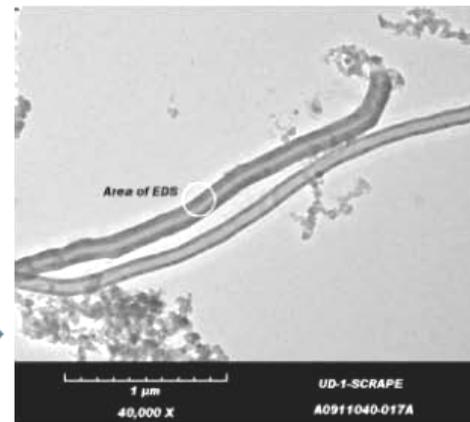
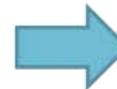
← Inadequate hand/wrist protection

Dermal exposure →



← Lab hood exhaust duct leakage

Took scraping of dark material and examined via TEM



Air Shower Decon



HEPA filtered “air shower” used to remove particulate resident on clothing. Interlock design ensures worker uses each time he enters/exits work area.

Contamination Control



Using HEPA vac
to clean outer
surface of trays
of spilled material

Dark specs are
clumps of raw
CNF's that
accumulate
during tray
loading



"Sticky mats" are used at the exit of
the tray loading room – This mat was
changed prior to transporting trays to
the furnace area. This accumulation is
due to 6 trips out to the furnace.

LBNL Rules for Engineered Controls



- **Zero exposure to ENP**
- **Work that could (or does) generate an aerosol containing engineered nanoparticles must be conducted in a ventilated system such as fume hood, appropriate BSC, glove box or glove bag**
 - **Avoid HEPA filtered stand alone hoods or biosafety cabinets if not exhausted to the outside**
 - **NEVER use laminar flow hoods (clean benches)**
- **Test and maintain these systems**



Spills



- **Small spills cleaned up by lab personnel**
- **Large spills cleaned up by hazmat team**
- **Refer any people exposed in the incident for a medical review**
- **Clean up spill using wet methods/HEPA vacuuming**
- **Treat all clean up equipment as “contaminated”**
- **Dispose of waste appropriately**



LBNL Administrative Controls



- **Develop and implement a chemical hygiene plan specific to the scope of activities**
- **Housekeeping**
 - Clean surfaces after each shift if contaminated**
 - **Consider reactivity of material when selecting method**
 - **Dedicated HEPA Vacuum**
 - **Wet wiping**
- **Work practices**
 - Keep materials in closed containers except when inside ventilated systems**

Posting and Labeling



- Post signs at entrance to work area warning of nanomaterials
- Label storage containers
- Label contaminated equipment



**Hood may be contaminated
with nanoparticles.**

**Contact building manager
prior to servicing**

Materials Sciences Division



Building 67 Rooms 1201



MINIMUM REQUIRED PERSONAL PROTECTIVE EQUIPMENT:

Eye protection required within delineated area surrounding fume hood
Carry eye protection at all times in other parts of lab

APPLICABLE FORMAL WORK AUTHORIZATION DOCUMENTS:

None

COMMENTS:

RESPONSIBLE INDIVIDUALS:

Name	Location	Work Phone #	Work Cell #	Home Phone #
Frank Ogletree	67-1210	(510) 486-4862	(510) 305-7908	(510) 528-3502
Virginia Alton	67-1212	(510) 486-5173		(510) 559-7814
Miguel Salinas	67-2111	(510) 486-6704	(510) 234-3212	

BUILDING AND FACILITY MANAGER:

Name	Location	Work Phone #	Work Cell #	Home Phone #
Gil Torres	62-104A	(510) 486-5395	(510) 289-5137	(925) 756-7255
Rick Kelly	67-3205	(510) 486-4088	(510) 457-8452	(510) 537-8391

LBNL: Worker Competency



- Identify people potentially exposed to nanoparticles
- Provide appropriate nanosafety training
- Provide awareness-level training to guests (users)



•You can take the LBNL awareness class on line (use “non-LDAP log in) at:

<http://ehswprod.lbl.gov/coursebuilder/course/courselogin.aspx?cid=100&sid=1238> (non-LDAP log in)

MSDSs often of Little Use



MSDS for Nanomaterials: Effective?

Case Study by NIOSH (AIHce 2009 Presentation)

- 60 MSDS's for Nanomaterials reviewed.
- 58% referred to the PEL for bulk material
- 80% did not provide size information
- 87% did not contain toxicological data specific to the nanomaterial.

Detailed information was presented at AIHce

Work needed!

Everybody is Working On This!



IRSSST publications



Best Practices Guide to Synthetic Nanoparticle Risk Management

Ostiguy, Claude; Roberge, Brigitte; Ménard, Luc; Endo, Charles-Anica
 Studies and Research Projects / Report R-599, Montréal, IRSSST, 2009, 67 pages.
 Order printed version (R-403) Version française disponible : R-586

Free download (526 Ko)

Toxicity of Carbon Nanotubes

Dr. Jacques Ragot, Bayer MaterialScience AG, Global Product Stewardship

Joint CASG-Nano and ENPRA Workshop on Early Harvest of Research Results on Nanosafety, Ispra, Italy, 14-15 April 2010

SAFE08

People at SLAC Making a Difference

SLAC Tackles Nanoparticle Safety: "We met the challenge through teamwork."

Photo: Phil Hoyer (top); Chris Chalmers (bottom)

SLAC

Issue 1, March 2007

nanoSAFE

Safe production and use of nanomaterials

Next update of the Integrated Project NANOSAFEZ

- Detection, monitoring and characterization techniques
- Health and hazard assessment
- Development of safe industrial production systems and applications
- Environmental and socio-economic aspects

icles. Prepared jointly by the IRSSST, CSST and NanoQuébec, this best practices guide proposes synthesizing nanoparticles.

nanoparticles is still limited. Among other things, the toxic effects related to the capacity of in certain organs and inside cells are only partially documented. While nanoparticles can be

FEATURE

Potential risks of nanomaterials and how to safely handle materials of uncertain

In the last few years, the number of research studies on the toxicity of different increased dramatically. These studies have suggested effects at the cellular level tests. The effects seen depend on the basic material of the nanoparticle, its substituents and coatings. Additional toxicology testing is being funded by Nanotechnology Infrastructure Network and other research organizations. Nanomaterials of uncertain toxicity can be handled using the same precautions to handle other materials of unknown toxicity: use of exhaust ventilation (such as enclosures) to prevent inhalation exposure during procedures that may release particles; gloves to prevent dermal exposure. This article presents an overview of some nanotoxicology and also discusses the best practices that universities such as SLAC are using to prevent exposure.

By Marilyn F. Hallock, Pam Greenley, Lou DiBerardinis, Dan Kallin

The focus of this article is engineered nanoparticles that are intentionally fabricated for their nanoscale properties.

WHAT ARE NANOMATERIALS?

The focus of this article is engineered nanoparticles that are intentionally

fabricated for their nanoscale proper-

European Agency for Safety and Health at Work

EUROPEAN RISK OBSERVATORY REPORT
LITERATURE REVIEW

Workplace exposure to nanoparticles

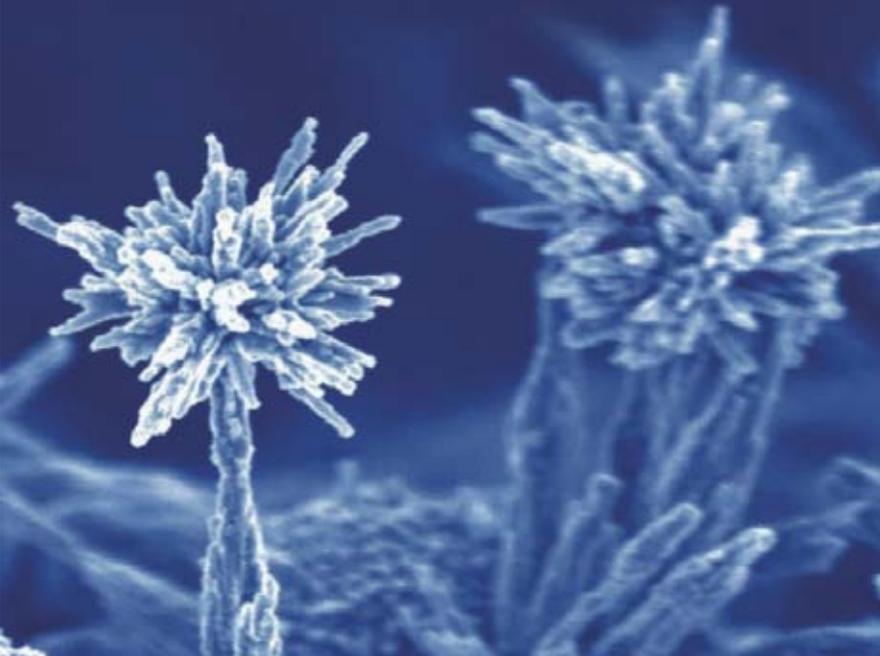
European Agency for Safety and Health at Work

Newest NIOSH Guide (3/2009)

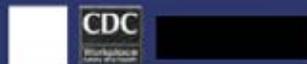


Approaches to Safe Nanotechnology

Managing the Health and Safety Concerns
Associated with Engineered Nanomaterials



DEPARTMENT OF HEALTH AND HUMAN SERVICES
Centers for Disease Control and Prevention
National Institute for Occupational Safety and Health



- Update of prior guidance
- Some good information
- Doesn't change a whole lot over earlier editions

ASTM E 2535-07 (10/07)



Designation: E 2535 – 07

Standard Guide for Handling Unbound Engineered Nanoscale Particles in Occupational Settings¹

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INTRODUCTION

Nanometer-scale particles are encountered in nature and in industry in a variety of forms and materials. Engineered nanoscale particles as a class comprise a range of materials differing in shape, size, and chemical composition, and represent a broad range of physical and chemical properties. Workers within some nanotechnology-related industries and operations have the potential to be exposed to these engineered nanoscale particles at levels exceeding ambient nanoscale particle concentrations through inhalation, dermal contact and ingestion when not contained on or within a matrix (unbound). Occupational health risks associated with manufacturing, processing and handling unbound nanoscale particles, agglomerates or aggregates of nanoscale particles are not yet clearly understood. Dominant exposure routes, potential exposure levels and any material hazard are expected to vary widely among particular nanoscale particle materials and handling contexts. Additional research is needed to understand the impact of these exposures on employee health and how best to devise appropriate exposure monitoring and control strategies. Until clearer understandings emerge, the limited evidence available suggests caution when potential exposures to unbound engineered nanoscale particles (UNP) may occur.

DOE NSRC Safety Guideline





Current Intelligence Bulletin 60

Interim Guidance for Medical Screening and Hazard Surveillance for Workers Potentially Exposed to Engineered Nanoparticles

ISO Technical Report 12885 (10/2008)



- **Health and safety practices in occupational settings relevant to nanotechnologies**
 - Literature review
 - Exposure assessment techniques
 - Air sampling
 - Dermal exposure assessment
 - Risk assessment strategies
 - Exposure control strategies
 - Administrative controls
 - Recordkeeping
 - Waste management, fire and explosion control
 - PPE

Early Nanotechnologist?

