

#04-7984

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I am Dr. Heesun Chung, the head of department of Forensic Science at the National Institute of Scientific Investigation in Korea. As a Forensic Toxicologist, I would like to make some comments on the proposed revisions of the federal drug free workplace guideline.

Firstly the collection of oral fluid by spitting is not pleasant. A couple of years ago we studied the the concentration of toluene in Glue sniffer's saliva and the device was very useful for collecting the saliva. Therefore I would like to recommend to use FDA- cleared collection device.

Secondly in this lab, we have applied the hair testing for methamphetamine cases for almost ten years now. In methamphetamine cases, it is necessary to consider the ratio of amphetamine and methamphetamine all the time, because the amount of amphetamine is very small always. Therefore in this lab we set the guideline that the case will be positive when methamphetamine is over 0.5ng/mg, while amphetamine is detected. Every year we have tested almost 3000 cases. In many cases, not enough amphetamine can be detected, therefore I would like to recommend the cutoff level of amphetamine is LOD instead of 50 pg.

I hope my comments will be useful.

Best regards,

heesun chung

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