

INDEPENDENT LUBRICANT MANUFACTURERS ASSOCIATION

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JUN 18 1990

June 15, 1990

Dr. Richard Niemeier, Director
Division of Standards Development
and Technology Transfer
National Institute for Occupational
Safety and Health
4676 Columbia Parkway C-14
Cincinnati, OH 45226

Dear Dr. Niemeier:

The Independent Lubricant Manufacturers Association (ILMA) submits the enclosed information in partial response to the National Institute for Occupational Safety and Health's (NIOSH) request for comments and secondary data relevant to occupational exposure to cutting fluids. 55 Fed. Reg. 20,637 (May 18, 1990).

ILMA is a national trade association of more than 150 companies, ranging in size from fewer than 10 to more than 200 employees, which blend, compound, and sell more than 60 percent of the industrial and metalworking lubricants and 25 percent of the motor oils used in this country. ILMA member companies are neither owned nor controlled by the companies that explore for, own, or refine crude oil used to produce lubricant base stocks. Purchasing mineral oil and synthetic lubricant base stocks and a wide range of additives, independent lubricant manufacturers compound and blend the base stocks and a wide range of additives to produce high-quality automotive and industrial lubricants and greases. Additives provide required performance characteristics in the finished lubricant product.

Independent lubricant manufacturers, because of their size and proximity to their customers, are well equipped to provide highly specialized, often proprietary, lubricant formulations to meet special customer requirements. ILMA members base their success on traditions of service and innovation in supplying lubricants to other small and medium-sized businesses, as well as to industrial and commercial giants.

In 1988, the latest year for which data is available, 92 of the independent lubricant manufacturers responding to our annual survey reported manufacturing 92.9 million gallons of metalworking fluids.

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As an initial matter, ILMA does not believe that NIOSH has provided sufficient time for interested parties, including this association and our member companies, to assemble existing and available materials on cutting fluids, additives, and contaminants and their uses in industries involved in metalworking. Because ILMA wants to be responsive to NIOSH's information and data request, the association has petitioned the agency for an extension of the June 18, 1990 comment deadline. In a June 14 letter to NIOSH's legal adviser, Gwen Strickland, our counsel set forth ILMA's argument for its deadline extension request. Hopefully, our request will be granted.

I have enclosed an unedited draft of a publication being prepared by ILMA's Research and Development Committee on waste minimization and wastewater treatment of metalworking fluids. As you can see, this document is a compilation of papers written by experts in the metalworking fluids area. Many of the chapters are responsive to NIOSH's request, including the ten examples of requested information listed in the agency's May 18, 1990 Federal Register notice. ILMA's Research and Development Committee currently is in the process of editing the submitted papers, and the final publication is scheduled for release later this summer. Accordingly, ILMA's submission should be viewed and read as a draft at this time.

On June 12, members of ILMA's Government Affairs Committee met with Ms. Brenda Boutin of your office concerning NIOSH's information and data request. We had a useful and informative discussion on the agency's cutting fluids activities and available materials. At this meeting, several ILMA member companies indicated that they would submit information and data directly to NIOSH, although they expressed serious doubts that their submissions would be made by the June 18 deadline. Other ILMA member companies have indicated an interest in providing information and data to the association, which, in turn, will be submitted to NIOSH. Accordingly, if the comment deadline is not extended, ILMA requests that it be permitted to supplement this filing.

Please do not hesitate to contact me if you have any questions.

Sincerely,



Nancy J. DeMarco
Executive Director

Nancy DeMarco
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**Waste Minimization and
Wastewater Treatment
of Metalworking Fluids**

DRAFT

MAY, 1990