



BRIGGS & STRATTON CORPORATION

June 27, 1996

Having reviewed NIOSH's "Criteria For a Recommended Standard; Occupational Exposures to Metalworking Fluids." we would like to address a few areas of concern.

1. Though we believe it is not NIOSH's intention, we feel the use of the term Metalworking Fluids is misleading and would include things such as stamping lubricants, etc.
2. With the advances made in the metalworking fluid industry over the last 20 years we feel the data used to support the recommended exposure level of 0.5 mg/M³ is outdated and inaccurate for the fluids of today. It is our opinion that the carcinogenic potential of metalworking fluids have been greatly reduced and quantification of the risk is not yet possible.
3. The expense of retrofitting existing machines without the guarantee of success to achieve such an extremely low exposure level will not be beneficial to any party involved. Since the majority of metalworking fluid users employ less than 100 people this action will cause many people to lose their jobs.
4. It is Briggs & Stratton's belief that with a good fluid management program along with reasonable regulations, fluid exposure could be kept to a minimum. Therefore, eliminating the need for a continuous medical monitoring program. To implement such a program would be very expensive and quite difficult.

In conclusion, we at the Briggs & Stratton Poplar Bluff facility feel that the safety and health of our employees is of the foremost importance. We do not believe that such an extremely low exposure level would be beneficial for either party.

Sincerely,

Nathan Williams
Safety Tech

R E C E I V E D

JUL 19 1996

NIOSH DOCKET OFFICE