



Safety, Health, Environmental, and Regulatory Affairs Committee Annual Meeting Minutes
The Broadmoor
Colorado Springs, CO
Saturday, September 28, 2002
8 am – 10 am MT

Participants:	Company Name/Title
Cathy Barmoy	ILMA/SHERA Manager
Daniel Goon	Castrol Industrial N.A./Director HSSEQ
Robert Fensterheim	Chlorinated Paraffins Industry Assoc./Executive Director
Dwain Colvin	Dover Chemical/President
Dave Rankin	Dover Chemical/Vice President
Jim McNeil	Dover Chemical/Business Manager
Jeffrey Leiter	ILMA Counsel
Bob McKay	Metalloid Corp./President
Lon Fanning	Perkins Products/Vice President of R&D
Cheryl French	Buckman Laboratories/Market Manager
Michael Charnigo	Buckman Laboratories/Group Business Manager
Cathy Novak	Eastern Oil Company/MWF & Tech Service Manager
Eugene White	Milacron/Manager, Environmental Sciences
Carol Poole	Quaker Chemical/Health and Safety
Rich Kraska	Lubrizol/Manager, Tox & Reg Special Projects
John Cutcher	D.A. Stuart/Director, Research and Technology
Ron Powell	Moroil/President
Jim Karalekas	American Saw and MFG/Manger, Fluid Products
Kristin Pelizza	D.A. Stuart/Manager, EHS Support
Eugene Berthusen	Cutting & Grinding Fluids/President

- I. Committee chairs Carol Poole, Rich Kraska, and Gene White welcomed SHERA Committee participants.
- II. An attendee's list was passed around.
- III. Jeff Leiter reviewed ILMA's antitrust guidelines for those members present.

Business Items Discussed:

- I. Mid-Year Meeting minutes were approved. For further comments or corrections, please inform Cathy Barmoy, and revisions will be sent to the Committee.
- II. Carol Poole discussed with SHERA members the idea to extend the Committee commitment of officers to two years because of the nature of the issues and topics covered by the group. Cathy Novak moved that Ms. Poole's recommendation be adopted, beginning with this year's Committee officers. Dave Rankin seconded Ms. Novak's motion, and the motion was agreed to by the Committee.
- III. Members discussed 2003 Mid-Year Meeting speaker and topic ideas. Cathy Barmoy presented the group with information provided by ILMA Treasurer Jim Taglia concerning United States Compliance Corporation. This company offers a wide range of compliance services and is willing to speak on a compliance issue of interest to ILMA and the SHERA Committee. Other speaker and topic options will continue to be explored.

Outstanding Issues Updated/Discussed:

- I. ACGIH Symposium: A copy of the draft agenda for and ILMA members attending the upcoming ACGIH Symposium were provided to the Committee members. Metalworking fluids will be heavily discussed at the symposium; however, Dan Goon stressed that presenters will be emphasizing the differences between threshold limit values (TLVs) for Mineral Oil Mist and Metalworking Fluids. A discussion panel will offer the opportunity for key speakers to answer questions raised during the three-day symposium. Those members who attend the symposium will draft and combine notes, and a summary will be provided to the SHERA Committee.
- II. Lucke/Hoffman Study Continuation: Bill Lucke informed the group that he does not feel comfortable continuing the evaluation of the studies because of missing data. Dr. Lucke recommends hiring an epidemiologist to continue reviewing the studies. SHERA Committee chairs will discuss viable options with Dr. Lucke at the ACGIH Symposium. Committee members present discussed the need to complete the study versus dropping it all together. There was consensus among the members that ILMA supports good data no matter the results and that opportunities need to be explored in continuing if resources permit.
- III. Chlorinated Paraffin's Update and Call to Action: Bob Fensterheim from CPIA reviewed the presentation from the June 28 web cast conference call that included ILMA members who were interested in learning how ILMA and CPIA could collaborate on issues surrounding Chlorinated Paraffins (CPs). CPIA has been advocating the need for a life cycle management program related to fluids. The Canadian government assumes that all spent fluids containing CPs are being disposed of in wastewater and that the problem is with formulators and end users, not the chemical producers. With the potential spill over effect from Canada to the United States, CPIA is concerned this may trigger unnecessary U.S. actions in the future. CPIA feels that ILMA needs to get more involved because there is no ILMA counterpart in Canada. Those who are interested in becoming more proactive on this issue may contact Cathy Barmoy or Bob Fensterheim directly.
- IV. Update on Product Stewardship: Committee Chair Carol Poole highlighted the new LubeCare information packets now available for distribution for anyone interested in product stewardship and LubeCare. A LubeCare workshop is currently being planned, but the Committee needs to decide following the Annual Meeting whether to focus on implementation or education. John Cutcher pointed out that many companies will still need to gain upper management commitment and that should be a strong focus of the workshop. Cathy Novak concurred. It was suggested that the product stewardship subcommittee meet on a regular monthly or bi-weekly basis to discuss the workshop in more detail as well as the future direction of LubeCare. Members discussed finding a company willing to be used as a case study for implementing LubeCare at their facility, and then presenting these results during the workshop.

New Issues Discussed:

- I. NTP: Rich Kraska shared with the committee that NTP has completed a pilot study using Transgenic Mice. This study used mice that developed tumors faster than normal. With the shorter testing time this will help save on testing costs. This testing is used as a method to develop standards for various chemicals. The first round of chemicals used during the pilot study did not include Metalworking Fluids, however the committee will continue to monitor and update the group on any additions. Gene White believes this approach will not be adopted by NTP any time soon.

Gene White proposed to the Committee that someone from an ILMA member company be nominated for NTP's Board of Directors. Dr. White will determine the procedures for someone becoming a NTP board member. Mr. Fensterheim will send Dr. White information that he may have on this subject.

Cathy Barmoy updated the Committee that NTP has approved DEA to be evaluated for further testing. DEA has been nominated as a cancer-causing agent. If DEA makes it through the next stage of testing and evaluations, DEA will be reported as a cancer agent.

- II. OSHA: Secretary of Labor Elaine Chao announced her department was launching a new initiative to help small business owners navigate what she called the "regulatory jungle" and do a better job of protecting employees. The goal of the initiative is to help employers better understand and meet their responsibilities to protect workers under the nation's labor laws and regulations, including OSHA regulations. OSHA wants to focus more on delivering the education and assistance small companies need so they can comply.
- III. EPA Rulings: EPA is evaluating the comments and data on its proposed MP&M rulemaking, and the final rule is to be published by December 2002. It is expected that the final rule will include limits for metals and cyanide. The proposed rule, if adopted, would require ILMA members possibly to reformulate their products to reduce the amount of certain organic pollutants that are captured by the following parameters: Oil and Grease, Total Organic Carbons, and/or Total Organic Parameters. Those who use O&G and TOC are less likely to be effected unless non-organic substitute materials may be reformulated into a product.

SPCC Ruling: SPCC (spill prevention and control and countermeasures) regulations are intended to prevent and respond to discharges of oil from facilities. The revise rule, issued last July, expands the definition of "covered waters" and applies to facilities that consume and store oil above certain thresholds and could reasonably be expected to discharge oil in "harmful quantities" into navigable waters or shorelines in US. The definition of "navigable waters" is expanded and clarified for intrastate waters.. Any tie to interstate waters will make a body of water navigable and will subject adjacent facilities storing or using oil over the rule's threshold to the SPCC requirements. SPCC plans must now be reviewed every five years as opposed to every three years, and any necessary changes to the plan must be made within six months.

- IV. BLF/UEIL Relations: John Cutcher will be attending BLF meeting in January. Cathy Barmoy will follow up with BLF MWF PG if we can get a copy to distribute among SHERA of the MWF Compound and End User Prohibited Chemicals CD provided by the BLF at their last meeting.

Meeting Adjourned 10:05 am MDT