



ACGIH[®]

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Defining the Science of Occupational and Environmental Health[®]

February 1, 2010

Celeste M. Powers, CAE
Executive Director
Independent Lubricant Manufacturer's Association
400 North Columbus Street, Suite 201
Alexandria, VA 22314

Adam Kramer, Esq.

Re: Mineral Oil, excluding metal working fluids

Dear Ms. Powers and Mr. Kramer,

The ACGIH[®] Board of Directors voted to adopt the proposed TLV[®]-TWA for Mineral oil, excluding metal working fluids. Mineral oil, pure, highly and severely refined has a TLV[®]-TWA of 5 mg/m³, inhalable particulate matter with an A4 carcinogenicity classification. Mineral oil, poorly and mildly refined has an A2 carcinogenicity classification. Your comments were carefully considered by the TLVs[®] for Chemical Substances Committee before the recommendation for adoption was made to the Board of Directors.

When the *Documentation* becomes available to the public, around March 1, 2010, we will send you a copy of the 2010 *Documentation* for Mineral Oil, excluding metal working fluids for your personal use and review. This copy will be provided to you because of your submission of comments during the TLV[®] development process. This *Documentation* will also be made available to the public via the ACGIH[®] website at www.acgih.org/store.

For future submissions, please note the recent change made to the NIC and NIE Comment Period of the ACGIH[®] TLV[®]/BEI[®] Development Process. The comment period for an NIC or NIE draft *Documentation* and its respective TLV(s)[®], notation(s), or BEI(s)[®], is limited to a firm six-month period, running from February 1 to July 31 of each year. Because of the time required to review, evaluate, and consider comments during the fall meetings, any submissions received after the July 31 deadline will not be considered in that year's committee deliberations regarding the outcome for possible adoption of a NIC or NIE. All comments received after July 31 will be fully considered in the following year.

When submitting comments, ACGIH[®] *now* requires that the submission be limited to 10 pages in length, including an executive summary. The submission may include appendices of citable material not included as part of the 10-page limit. It would be very beneficial to structure comments as follows:

1. Executive Summary--Provide an Executive Summary with a limit of 250 words.
2. List of Recommendations/Actions--Identify, in a vertical list, specific recommendations/actions that are being requested.
3. Rationale--Provide specific rationale to justify each recommendation/action requested.
4. Citable Material--Provide citable material to substantiate the rationale. Citable material is data that is available in the public domain or that we have written authorization from the owner to use. For unpublished data/studies, it is important for this authorization to accompany the submission and it must grant ACGIH[®] permission to use, cite, and release the data. Please refer to our website at <http://www.acgih.org/TLV/DevProcess.htm> for instructions on how to complete this permission statement.

Draft *Documentation* for an NIC or NIE is made available for public review during the full six-month period. Please visit the ACGIH[®] website (www.acgih.org) for complete information regarding the TLV[®]/BEI[®] Development Process.

Thank you for your participation in our process.

Regards,

A handwritten signature in cursive script that reads "Amy Bowers". The signature is written in black ink and is positioned above the printed name.

Amy Bowers
Science Coordinator
ACGIH®