



INDEPENDENT LUBRICANT MANUFACTURERS ASSOCIATION

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July 30, 2009

James H. Price, CIH

Director of Science

American Conference of Governmental Industrial Hygienists

1300 Kemper Meadow Drive

Cincinnati, OH 45240-1634

Dear Mr. Price:

The Independent Lubricant Manufacturers Association (“ILMA”) submits the following comments on the American Conference of Governmental Industrial Hygienists’ (ACGIH) proposed Threshold Limit Value - Time Weighted Average for “Mineral Oil Used in Metal Working.” These comments supplement ILMA’s submissions to ACGIH, dated July 28, 2006, July 30, 2007, and July 30, 2008,

ILMA, established in 1948, is a national trade association of 135 manufacturing member companies. As a group, ILMA member companies blend, compound and sell over 25 percent of the United States’ lubricant requirements and over 75 percent of the metalworking fluids (MWFs) utilized in the country. Independent lubricant manufacturers by definition are neither owned nor controlled by companies that explore for or refine crude oil to produce lubricant base stocks. Base oils are purchased from refiners, who are also competitors in the sale of finished products. Independent lubricant manufacturers succeed by manufacturing and marketing high-quality, often specialized, lubricants. Their success in this competitive market also is directly attributable to their tradition of providing excellent, individualized service to their customers.

ILMA appreciates ACGIH’s consideration of our prior comments in its recent deliberations. ILMA agrees with ACGIH’s conclusion and decision, noted in your letter of February 1, 2009, that the proposed change to the Threshold Limit Value – Time Weighted Average for Mineral Oil, Pure, Highly and Severely Refined should no longer apply to mineral oils used in metalworking because of the complex and highly variable nature of these fluids.

The Association supports — and ACGIH should be aware of — the efforts now beginning under the auspices of ASTM Committee E34 (Occupational Health and Safety) to develop a voluntary consensus health and safety standard for metalworking that implements “total systems management,” a concept unanimously endorsed by the OSHA Metalworking Fluids Standards Advisory Committee in 1999. We expect that this ASTM standard will be based on OSHA’s Metalworking Fluids Safety and Health Best Practices Manual.<sup>1</sup>

ILMA encourages ACGIH to participate in the development of ASTM’s voluntary standard to ensure all stakeholders’ views are considered. The first meeting on this ASTM standard will be held on October 21, 2009, as part of

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ASTM's Committee Week in Atlanta, Georgia. Please contact Kevin Shanahan, Staff Manager for Committee E34 at [kshanaha@astm.org](mailto:kshanaha@astm.org) for further information.

We applaud ACGIH's mission and greatly appreciate the opportunity to contribute to its efforts.

Sincerely,

A handwritten signature in black ink that reads "Celeste Powers". The signature is written in a cursive, flowing style.

Celeste M. Powers, CAE  
ILMA Executive Director

cc: ILMA Board of Directors  
ILMA SHERA Committee  
Jeffrey L. Leiter, Esq.  
Adam B. Cramer, Esq.