



ACGIH[®]

1330 Kemper Meadow Drive \$ Cincinnati, OH 45240-4148, USA
Phone: 513-742-2020 \$ Fax: 513-742-3355
E-Mail: mail@acgih.org \$ <http://www.acgih.org>

Defining the Science of Occupational and Environmental HealthSM

February 1, 2008

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

Adam Cramer

Re: Mineral oil

Dear Ms. Powers and Mr. Cramer,

The ACGIH[®] Board of Directors voted to retain the proposal for a TLV-TWA for Mineral oil on the 2008 Notice of Intended Changes. The TLV proposal for Mineral oil is unchanged from 2007. The proposed TLV-TWA for Mineral oil in metal working is 0.2 mg/m³ with an A2 carcinogenicity classification for poorly and mildly refined and an A4 carcinogenicity classification for highly and severely refined. The proposed TLV-TWA for Mineral oil, pure, highly and severely refined has a TWA of 5 mg/m³ with an A4 carcinogenicity classification. Because of workload and committee staffing issues, the committee was unable to complete its review of all comments before the fall meeting. There are matters remaining that will be considered and discussed while Mineral oil remains on the NIC.

I have attached a copy of the 2008 NIC draft *Documentation* for Mineral oil for your personal use and review. Please note that the 2008 NIC draft is the same as the 2007 NIC draft for the reasons cited above. This copy is provided because of your submission of comments during the TLV[®] development process. We welcome further input in response to a review of the NIC draft *Documentation*. Your input is valued by ACGIH[®], and is under careful consideration during our TLV[®]/BEI[®] Development Process. The draft *Documentation* is also available to the public through the ACGIH[®] website at www.acgih.org/store.

Please also remember the change that was made to 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. ACGIH[®] restructured the comment period effective January 1, 2007 to ensure all comments were received by ACGIH[®] in time for full consideration by the appropriate Committee before its fall meeting. 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.

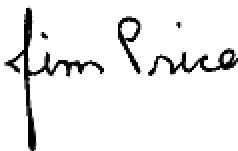
When submitting comments, ACGIH® prefers that the submission be limited to 10 pages in length, including an executive summary. The submission may include appendices of citable material not included as part of the 10-page limit. It would be very beneficial to structure comments as follows:

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 to Use statement, or request a sample Permission to Use statement from ACGIH®.

Draft *Documentation* for an NIC or NIE is available for review during the full six-month period. You may visit the ACGIH® website (www.acgih.org) for complete information regarding the TLV®/BEI® Development process.

Recommendations made at the 2008 fall committee meeting will be forwarded to the ACGIH® Board of Directors and action taken will be reported in the ACGIH® Annual Report in February 2009.

Thank you for your participation in our process.

A handwritten signature in black ink that reads "Jim Price". The signature is written in a cursive, slightly slanted style.

James Price, CIH
Director of Science
ACGIH®