



ACGIH[®]

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Defining the Science of Occupational and Environmental Health[®]

February 1, 2009

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 and TLV-STEL for Mineral Oil on the 2009 Notice of Intended Changes (NIC). The proposed TLV-TWA for Mineral Oil, pure, highly and severely refined is 5 mg/m³ with an A4 carcinogenicity classification and an A2 carcinogenicity classification for poorly and mildly refined. Note that the proposed TLV does not apply to mineral oils in metal working fluids, because of the complex and highly variable composition of these fluids. Your comments were considered by the TLVs[®] for Chemical Substances Committee before the recommendation for retention was made to the Board of Directors.

I have attached a copy of the 2009 NIC draft *Documentation* for Mineral Oil for your personal use and review. This copy is provided to you 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 was carefully considered during our TLV[®]/BEI[®] Development Process. The draft *Documentation* is also available to the public via the ACGIH[®] website at www.acgih.org/store.

Please also remember the change that was 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 black ink, appearing to read "Ryan Peltier". The signature is fluid and cursive, with a large initial "R" and "P".

Ryan Peltier, R.S.
Science Manager
ACGIH®