

GHS Aspiration Hazard Class Issues

- ▶ Independent Lubricant Manufacturers Association - trade association of 350 member companies whose Manufacturing Members compound, blend and sell over 25% of U.S. lubricant needs and over 75% of metalworking fluids. ILMA members are neither owned or controlled by the companies that explore for or refine crude oil into refined base stocks.
- ▶ GHS Table 3.10.1 identifies hydrocarbons with a kinematic viscosity of $\leq 20.5 \text{ mm}^2/\text{sec}$ at 40°C as Cat 1 aspiration toxicants resulting in many industrial oil products being classified with health hazard pictogram, same as a carcinogen, mutagen or target organ toxicant.

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- ▶ Original research¹ shows three petroleum distillates (83, 109, 156 SUS) produced no deaths in an aspiration experiment while one of 73 SUS produced 1 death in 10.
- ▶ ILMA suggests that the GHS Subcommittee consider redefining the “bright line” from ≤ 20.5 mm²/sec at 40°C to ≤ 17.6 mm²/sec at 40°C based on Gerarde research.

1 - Gerarde, H.W., “Toxicological Studies on Hydrocarbons,” Archives of Environmental Health: Archives of Environmental Health, 6(3), 329-341 (1963)