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 \( < 20.5 \text{ mm}^2/\text{sec} \) at \( 40^\circ\text{C} \) 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.
GHS Aspiration Hazard Class Issues

- Original research\(^1\) 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 $< 20.5 \text{ mm}^2/\text{sec}$ at 40°C to $< 17.6 \text{ mm}^2/\text{sec}$ at 40°C based on Gerarde research.