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AUG 24 1990

Collier, Shannon & Scott

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August 22, 1990

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Dr. Richard Niemeier, Director
Division of Standards Development
and Technology Transfer
National Institute for Occupational
Safety and Health
4676 Columbia Parkway, C-14
Cincinnati, Ohio 45226

Dear Dr. Niemeier:

The Steel Manufacturers Association ("SMA") submits the following comments to the National Institute for Occupational Safety and Health's ("NIOSH") request for comments and secondary data relevant to occupational exposure to cutting fluids. 55 Fed. Reg. 20,637 (May 18, 1990). Members of SMA use cutting fluids in their steel manufacturing facilities.

SMA members believe that cutting fluids containing alkanolamines and sodium nitrite are no longer used in the metalworking industry. SMA also is unaware of any metalworking fluid manufacturers formulating cutting fluids with nitrosamines. In addition, members of SMA are unaware of any adverse health risks associated with occupational exposure to cutting fluids.

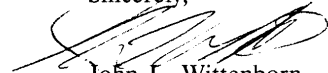
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Enclosed is a letter from McDonald Steel Corporation, a SMA member, stating the company's experience with two cutting fluids.

SMA appreciates this opportunity to provide its comments. Please do not hesitate to contact us if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'John L. Wittenborn', written over a horizontal line.

John L. Wittenborn
Counsel to the Steel
Manufacturers Association

Enclosure

August 14, 1990

McDonald
STEEL CORPORATION

*Specializing
in Hot Rolled Shapes*

100 Ohio Avenue
P.O. Box 416
McDonald, Ohio 44437
(216) 530-9118

Mr. John Wittenborn
Collier, Shannon & Scott
3050 K Street, N.W.
Washington, D.C. 20007

Re: Occupational Exposure to Cutting Fluids

Dear Mr. Wittenborn:

McDonald Steel Corporation presently uses two types of cutting fluids; a water soluble oil sold under the trade name 'SUNICOOL 6' and a cutting oil, 'GARIA-904', manufactured by Shell Oil. The 'SUNICOOL 6' is diluted to one part oil, fifty parts water and is used in our Roll and Machine Shop grinders. This oil was selected mainly because it keeps our grinding wheels free of build-up and it does a good job of cooling the workpiece. The 'GARIA-904' is used in our bolt threader, pipe threader and milling machine and is not diluted. Maximum exposure time to either of these oils is approximately six hours per working day. We do not use any additives with either of these oils. We are not aware of any contaminants in our cutting oils other than those incurred due to normal wear of grinding wheels.

In the past ten years McDonald Steel employees have not experienced any adverse health effects from exposure to either of these two cutting oils.

Sincerely,



Patrick K. Thomas
Project Engineer

PKT:ws