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July 29, 1996

Diane Manning
Education and Information Division
National Institute for Occupational Safety
and Health
4676 Columbia Parkway - Mail Stop C-34
Cincinnati, OH 45226-1998

Re: Revisions to Comments of the Independent Lubricant Manufacturers Association on the National Institute for Occupational Safety and Health's "Criteria for a Recommended Standard: Occupational Exposures to Metalworking Fluids"

Dear Ms. Manning:

The Independent Lubricant Manufacturers Association ("ILMA") submitted comments on May 31, 1996, on the National Institute for Occupational Safety and Health's ("NIOSH") "Criteria for a Recommended Standard: Occupational Exposures to Metalworking Fluids." Section III.E.4. of ILMA's comments (page 37) addresses chlorinated paraffins ("CPs") under NIOSH's chapter on "Selected Potentially Hazardous Chemical Ingredients or Additives." ILMA submits the enclosed, limited revisions to its May 31 comments on CPs. The enclosed, amended pages indicate deletions ("strike-out") and substitutions (double underlines).

Please attach a copy of these revisions to ILMA's May 31 submission that is included in the public record.

Sincerely,

Jeffrey L. Leiter
Jeffrey S. Longsworth
Counsel to the Independent Lubricant
Manufacturers Association

Enclosure
cc: Richard H. Ekfelt
ILMA Health & Safety Task Force
Dr. Edward Stein, OSHA
Andrea Blashka, EPA

4. Chlorinated Paraffins

NTP has studied only two chlorinated paraffins: C_{23}, 43 percent chlorine, and C_{12}, 60 percent chlorine. There are many other long and short-chain paraffins with varying chlorine levels besides the ones listed. Thus, NIOSH's statement (page 134) should read "(o)ne long chain chlorinated paraffin and one short chain chlorinated paraffin (C_{23}, 43 percent chlorine and C_{12}, 60 percent chlorine) were selected by the National Cancer Institute ("NCI") for toxicity and carcinogenity evaluation." Most metal removal fluid manufacturers have eliminated the two studied chlorinated paraffins from formulations when the information was released by NTP ~~and~~ chlorinated paraffin suppliers subsequently have removed these chlorinated paraffins from the marketplace by substituting chemicals made from other feedstocks such as alpha-olefins or fats.

In November 1994, EPA promulgated a final rule expanding the list of toxic chemicals subject to Section 313 reporting under the Emergency Planning and Community Right-to-Know Act ("EPCRA") that included limited chlorinated paraffins (*see* 59 Fed. Reg. 61432 (November 30, 1994)). In its rulemaking, EPA concluded that "there is insufficient evidence to list long-chain chlorinated paraffins on the EPCRA Section 313 list." *Id.* at 61462.

In fact, EPA only added short-chain (10-13 carbon) polychlorinated alkanes (*i.e.*, chlorinated paraffins/alpha-olefins) to the EPCRA Section 313 list. EPA made the determination to add these polychlorinated alkanes not because it could prove such chemicals cause cancer in humans, but because the standard for addition to the EPCRA Section 313 list is informal enough to add chemicals that can "reasonably be anticipated to cause an effect listed under EPCRA Section 313(d)(2)(B)." *See* Summary and Response to Public Comments, Docket No. OPPTS-400082, page 157. These effects include: cancer; reproductive dysfunction; neurological disorders; inheritable genetic mutations; or, other chronic health effects. However, despite the

need for further scientific studies on short-chain polychlorinated alkanes to determine their specific detrimental effects, if any, on humans, ILMA members began eliminating short chain polychlorinated alkanes from have been exploring the use of chlorinated materials not subject to EPCRA Section 313 reporting in their formulations.