

AUG 20 1990

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Collier, Shannon & Scott

Robert A. Collier (1917-1984)
Thomas F. Shannon
William W. Scott
David A. Hartquist
R. Timothy Columbus
Lauren R. Howard
Paul D. Cullen
Kathleen E. McDermott
Michael D. Sherman
Mark L. Austrian
Jeffrey W. King
John B. Williams
Paul C. Rosenthal
James R. Loftis, III
John L. Wittenborn
Jeffrey L. Leiter
Michael R. Kershow
Jeffrey S. Beckington
Judith L. Oldham
Jeanne M. Forch
Laurence J. Lasoff
Christopher J. MacAvoy
Patrick J. Coyne
Karen M. Lockwood
Dennis J. Whittlesey
Douglas W. Charnas

of Counsel
Patrick B. Fazzone *

*Resident In Australia

Attorneys-at-Law
3050 K Street, N. W.
Washington, D.C. 20007
Telephone: (202) 342-8400
Telecopier: (202) 338-5534
Writer's Direct Dial Number

(202) 342-8490

August 17, 1990

Kathleen Weaver Cannon
Daniel J. Harrold
Gary L. Melampy
T. Michael Jankowski
K. Michael O'Connell
Mary T. Staley
Robert M. Huber
R. Randal Black
Marcy M. Rehberger
J. Keith Ausbrook
Lawrence I. Sperling
Robin A. Fastenau
Keith J. Harrison
Mark K. Logan *
Robin H. Gilbert
A. Abigail Payne
Martin A. Wright
William M. Guerry, Jr.
Bernard A. Nigro, Jr.
Dawn M. Sanok *
Nicholas D. Giordano
David H. Laufman
David J. Potkul *
Catherine A. Micklitsch
Joanna K. McIntosh *
Jeffrey L. Poston *
Joseph S. Gerbaso *
Beverly Joyce Trew *

* Not Admitted In D.C.

FEDERAL EXPRESS

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:

I have enclosed confidential information to be included as part of the June 15 and August 17, 1990 submissions by the Independent Lubricant Manufacturers Association ("ILMA") in response 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).

The enclosed information includes the following:

- (1) A description of the test method protocols for these acute animal toxicology tests:
 - Acute oral screen
 - Acute dermal screen
 - Primary dermal irritation
 - Primary eye irritation

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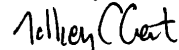
Dr. Richard Niemeier, Director
Division of Standards, Development and
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National Institute for Occupational Safety and Health
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- (2) A flow chart for interpretation of acute animal toxicology test results and selection of Material Safety Data Sheet health hazard statements.
- (3) Material Safety Data Sheet and confidential ingredient lists for five metalworking fluids identified as "#1," "#2," "#3," "#4," and "#5."

ILMA requests that the enclosed documents be treated by NIOSH as "confidential business information." Although company-specific references, including trade names, have been removed, each document in its entirety nevertheless is considered proprietary by its owner. Accordingly, ILMA further requests that NIOSH not make these enclosures publicly available without prior notification to ILMA and permission from the document's owner.

Please do not hesitate to contact me if you have any questions concerning the enclosed materials or ILMA's request for confidential treatment of these documents.

Sincerely,



Jeffrey L. Leiter
Counsel to the Independent
Lubricant Manufacturers Association

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Enclosures