

DOCKET OFFICE COPY



PENNZOIL PLACE • P.O. BOX 2967 • HOUSTON, TEXAS 77252-2967 • (713) 546-8516

SAROSH J. H. MANEKSHAW
Director
Environmental, Safety
and Health Affairs

June 15, 1990

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

RE: Request for Comments
Occupational Exposure to Cutting Fluids
55 FR 20637, May 18, 1990

Dear Dr. Niemeier:

Pennzoil Company is a natural resources company engaged in the exploration, production, refining, and marketing of petroleum products, and the mining and sale of sulphur. We thank the National Institute for Occupational Safety and Health (NIOSH) for allowing us to submit this formal letter outlining our forthcoming comments concerning occupational exposure to cutting fluids and the health hazards associated with these fluids. As per our June 13th conversation with your representative, Ms. Brenda Boutin, we will follow up this letter with our comments and information as soon as possible.

We have a great interest in cutting fluids since they are an integral part of the product line that we currently market. We believe that the information we will be submitting will be very valuable to NIOSH in the development of strategies for preventing and controlling any related exposures.

NIOSH has requested information, reports and research findings pertaining to cutting fluids and the health hazards associated with occupational exposures to these fluids. Pennzoil's comments will cover three (3) main topics including the following:

JUN 19 1990

June 15, 1990

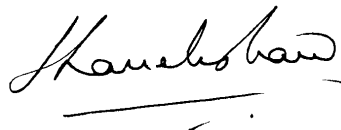
Page 2

- o The efforts of the American Standard Test Method (ASTM) Committee E-34.50.03 on Occupational Health and Safety to adopt a method for predicting the carcinogenicity of base lubricating oils used in cutting fluids. It is intended that this standard method will be used as an estimate of dermal carcinogenic activity of petroleum fractions;
- o The significant changes in the composition in cutting fluids in the past two decades; and
- o A summary of Pennzoil's toxicological data on cutting fluids.

Pennzoil believes that these areas of comment will greatly assist NIOSH in determining the extent of health hazards associated with occupational exposures to cutting fluids. This information will also contribute to the development of strategies for preventing and controlling any related exposures.

Again, we thank NIOSH for allowing Pennzoil to submit this formal statement outlining the contents of our forthcoming comments.

Very truly yours,



Hanshaw