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Dr. Richard Neimeier, Director
Division of Standards Development and Technology Transfer
NIOSH
4676 Columbia Pkwy
Mail Drop C-14
Cincinnati, OH 45226

Dear Dr. Neimeier:

The following comments pertain to NIOSH's request for comments concerning worker exposure to cutting fluids and additives.

Cutting fluid manufacturers have been blamed for all the problems that occur in and around a machine shop, when in reality they are only one segment of the issue.

Personal hygiene of the worker is very important. Clothing or shoes wet with plain water can cause a rash or irritation if worn for several hours. Hands continually in and out of water all day will become irritated. Add to this water the oils, emulsifiers, chemicals, biocides, etc. that make a functional machine shop fluid and the problem is compounded.

Then consider engineering controls such as adequate ventilation and splash guards on the machines. However, ventilation costs money in terms of equipment, and in terms of energy for heating and cooling the air. Splash guards may impede production, thereby increasing costs. Utilizing engineering controls can reduce airborne irritants and reduce direct spray contact.

Proper cutting fluid maintenance is another important factor. A too rich mixture can increase the possibility of irritation, too lean and rusting and loss of production occurs.

The cutting fluid manufacturer is in a constant adversarial position. He is rarely involved in a round table discussion of the proper use of a specific product, the engineering controls, safety and hygiene issues or insight into proper disposal. Yet he is supposed to make a product that is:

economical to use
worker friendly

OSHA acceptable and
EPA compatible

at the same time he has to defend his products against test protocols such as the two year daily dip in oil of mice without a soap and water bath at anytime, or the forced feeding of chlorinated paraffins mixed with corn oil to rats.

Everyone realizes that an excess of anything can be hazardous, but the hazards must be equated in realistic terms and conditions.

Respectfully,

Wayne M. Godfrey

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Research & Development