



2030 DOW CENTER  
June 12, 1996

The Dow Chemical Company  
Midland, Michigan 48674

Ms. Diane Manning  
National Institute for Occupational  
Safety & Health  
Education & Information Division  
Mail Stop C34  
4676 Columbia Parkway  
Cincinnati, OH 45226-1998

Dear Ms. Manning:

On June 11, I sent you a letter with some comments on NIOSH's proposed Criteria Document on Metalworking Fluids. I have enclosed a copy of that letter for your information. In that letter I stated, "OPP chemically can not release formaldehyde from its molecule under normal operating conditions." This statement may give the impression that OPP can release formaldehyde under some conditions. This is not so. The only way that OPP could possibly release formaldehyde is if the molecule were totally "pulled apart" by some process to carbon, hydrogen and oxygen and then reassembled.

I'm sorry for any inconvenience this may cause you and, again, request that you delete OPP from the formaldehyde releasing table. If you have any questions, please do not hesitate to contact me. Thank you for your consideration.

Sincerely,

Richard D. Olson, CIH  
Project Manager  
Environmental & Health Regulatory Affairs  
Midland, MI 48674  
(517) 636-8295

Enc.

**R E C E I V E D**  
JUN 18 1996  
NIOSH DOCKET OFFICE



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copy

Dear Ms. Manning:

The Dow Chemical Company (Dow) is responding to requests for comments on NIOSH's draft *Criteria for a Recommended Standard: Occupational Exposures to Metalworking Fluids*. The comments in this letter are brief and very specific to Dow materials identified in the document. Even though late, we hope these comments will be constructive and helpful. Dow personnel participated in the development of comments on the proposed Criteria Document which will be, or have been, submitted by the Chemical Manufacturers Association panel. Dow supports those comments.

On page 123 of the proposed document, NIOSH states that O-phenylphenol (OPP) can play a role in allergic contact dermatitis. This information is incorrect. OPP has been known to cause irritation of the skin but not allergic dermatitis. Please delete OPP from this statement.

On page 132 of the proposed document in Table 5-1, NIOSH states that Dowicide 1®, OPP, is a formaldehyde releaser. This is incorrect. The biocidal action of OPP is not dependent on release of formaldehyde. OPP chemically can not release formaldehyde from its molecule under normal operating conditions. Please delete Dowicide 1 from this table. In addition, Table 5-1 indicates that Dowicil 75® is a formaldehyde releaser. A recent test carried out by Dow indicates there is some question about this. Further, Dow has data indicating that under normal use conditions in formulated products, no detectable levels of formaldehyde are anticipated from Dowicil preservatives. Please indicate, e.g. with a footnote or otherwise, that testing data have not conclusively shown that Dowicil preservatives are formaldehyde releasing.

Ms. D. Manning  
June 11, 1996  
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On page 133 of the proposed Criteria Document, in Table 5-2, NIOSH states that XD-8254, in reality XD-8259, DBNPA, is 2,2-dibromo-3-nitrilopropion. The complete chemical name is 2,2-dibromo-3-nitrilopropionamide and the correct market designation is actually three products, Dow Antimicrobial 7287, Dow Antimicrobial 8259 and Dow Antimicrobial 8536. Please change this table to reflect this information. In addition, OPP should be added to this table as we discussed above.

Thank you for your consideration of our comments and those of the CMA panel. If you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "R Olson". The signature is written in a cursive style with a large initial "R" and a distinct "O".

Richard D. Olson, CIH  
Project Manager  
Environmental & Health Regulatory Affairs  
Midland, MI 48674  
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