RECKITT & COLMAN

May 31, 1996

Diane Manning
NIOSH
Education and Information Division
Mail Stop C34
4676 Columbia Parkway
Cincinnati, OH 45226-1998

Dear Ms. Manning,

RE - draft CRITERIA FOR A RECOMMENDED STANDARD: OCCUPATIONAL EXPOSURES TO METALWORKING FLUIDS

We appreciate the opportunity to provide input on the draft document.

As manufacturers and marketers of biocides, we have restricted our detailed comments to this aspect of the content of the draft.

As a general overview comment, we recognize that in preparation of the draft, the researchers have accessed published reports from the available world literature. However since the draft relates to the Occupational Exposure Risks faced by **U.S. workers**, we feel that some of the reports cited have the potential to introduce elements of confusion, by quoting names of products not actually sold in the United States. We believe that, if non-U.S. data is to be cited, it should be clear to U.S. workers how the information relates to products to which they are actually exposed in the workplace. This could be accomplished by referencing products consistently by their chemical nomenclature, rather than by brand name.

Page 123, Para 4.3.2 Irritants

- Line 5 of Para 4.3.2 references "triazine (Grotan BK®)". Our company is one of five primary registrants under FIFRA of the chemical Hexahydro-1,3,5-tris(2-hydroxyethyl)-s-triazine, and we market the product as GROTAN®. The suffix BK is not used, and has never been used within the United States.

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RECKITT & COLMAN INC.
U.S. PROFESSIONAL LABORATORIES DIVISION
3 Director Court, Unit 104, Woodbridge, Ontario L4L 4S5
Telephone: 1-800-461-9364
Fax: (905) 264-2266

- Line 5 of Para 4.3.2 cites N-methylol-chloroacetamide (Parmetol K50®) as a potential cause of ACD. Parmetol K-50 is marketed by our company in Europe, primarily as an in-can preservative for paints and adhesives. The product has not been, and will not be registered and marketed in the United States. Our company is the sole source of the cited active, and did utilize it in another product in the United States, however the latter product was withdrawn almost 10 years ago.

  Since U.S. workers are not exposed to N-methylol-chloroacetamide, we believe that inclusion of this active as a potential cause of ACD in U.S. based workers is therefore inappropriate.

- Of particular concern is the use of the Brand name PARMETOL® in the draft, as we have registered this trade mark recently with the intent of utilizing it for for a totally different chemical for the U.S. market. Thus inappropriate inclusion would lead to the potential for both confusion as well as possible damage to the credibility of an unrelated new product.

Page 125, line 1

"Andersen et al. ...."

- 1,2-benzisothiazolin-3-one is a demonstrated skin sensitizer, but is **NOT** a formaldehyde releaser (See technical literature from e.g. Zeneca Biocides).

- We believe that there is a strong possibility that the nomenclature 1,3,5 - tris - (hydroxyethyl) - hydroxyhydrotriazine is incorrect, but do not have a copy of the original source to confirm this.

  1,3,5-tris-(hydroxyethyl)-hexahydrotriazine is an alternate nomenclature for the active ingredient in our product GROTAN, which is Hexahydro - 1,3,5, - tris (2-hydroxyethyl) -s- triazine. Although the original source of the information may use the alternate nomenclature, we recommend that NIOSH use consistent nomenclature throughout the document to reduce the risk of confusion to the reader who will generally have neither the original reference documents to review, or the specialized knowledge to identify that the two nomenclatures reference the same material.

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Page 132, Table 5.1

The Table contains a number or errors and inconsistencies:

- Our earlier comments clarify that the correct U.S. Brand name for our product is GROTAN® .

- Despite the minor difference shown in the table for the nomenclature for GROTAN BK and ONYXCIDE 200, these two products are chemically identical! There are five primary registrants of this chemical, Hexahydro -1,3,5, - tris (2-hydroxyethyl) -s- triazine under FIFRA, these being:

Brand Name	Registrant
GROTAN®	Reckitt & Colman Inc.
ONYXCIDE® 200	Stepan Company
BUSAN® 1060	Buckman Laboratories
BIOBAN® GK	Angus Chemical Company
TRIADINE® 3	Olin Corporation

  We would suggest that if Brand names are to be left in the document, then at a minimum, all five names should be listed to maintain a "level playing field". This would not however capture all triazine products, since a number of metalworking fluid formulators market this material under their own brand name, as a supplemental registrant of one of the above five products.

- We are confident that you will receive comments from some of the suppliers of other biocides listed, however we would point out that the mechanisms of action of at least the last four of the chemicals listed in Table 5.1 do NOT involve formaldehyde release. We would encourage a careful review of the contents of the table to correct these errors.

Page 133, Line 4

"Examples of commonly used non-formaldehyde releasing biocides are presented in Table 5-2..."

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- In reality, the examples cited are **not** commonly used biocides in metalworking fluids. This can be confirmed by checking with either the major fluid users and / or the major fluid manufacturers, both of which are likely to be well represented at the upcoming meeting at the Drawbridge Inn.

Page 201, line 3

"When it is necessary to replace MWFs because of microbial overgrowth, it is usually necessary (to) remove the degraded MWF and clean the entire circulating system and sump before replacement with clean MWFs. If the cleaning is not thorough enough, overgrowth may rapidly reoccur."

- A more accurate second sentence in the above would be:

  "Incomplete cleaning of the system will contribute to the potential for rapid overgrowth of the fresh MWF".

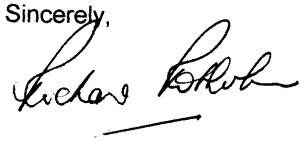
  Rationale: Regrowth is not simply a question of the initial level of contamination, but also depends on the inherent bioresistance of the MWF, and / or whether biocide additions are used as part of a regular MWF maintenance system.

One Corporate Toxicologist also reviewed the draft criteria and provided a final general comment that throughout the document, there are conclusions made on health effects which are not substantiated by statistical significance or biological significance in the reported data. Frequently, sentences begin with "In conclusion: and continue with "studies suggest". As our toxicologist points out, these are statements or opinions, but are definitely not conclusions.

We trust that you will find our comments useful, and if you wish to discuss any aspects of the comments further, I can be reached at 1-800-461-9364,

Thank you again for the opportunity of providing input.

Sincerely,



Richard A. Rotherham
Director, Sales and Marketing