



BASIL 'Buzz' HARGROVE
National President
Président national

205 PLACER COURT, NORTH YORK
WILLOWDALE, ONTARIO M2H 3H9
TEL: (416) 497-4110
FAX: (416) 495-6559

JIM O'NEIL
National Secretary-Treasurer
Secrétaire-trésorier national

May 22, 1996

Ms. Brenda Boutin
NIOSH
CDC
4676 Columbia Parkway
Cincinnati, Ohio
USA 45226

Dear Ms. Boutin:

Thank you for sending us the information about the upcoming meeting concerning the Draft Document, "*Criteria for a Recommended Standard: Occupational Exposures to Metalworking Fluids (MWFs)*".

We had previously read the document itself and on the whole we found the document quite well done.

We wish to comment on the proposed standard itself, however. In our opinion, the 0.5 mg/m³ standard is not stringent enough to protect worker health. We know, for example, that Dr. Susan Kennedy has found cross shift breathing impairment as a result of exposure to MWF of 0.2 mg/m³. Thus the NIOSH recommendation should be no less stringent than 0.2 mg/m³.

As well, we are concerned about an outbreak of hypersensitivity pneumonitis among our members employed at the General Motors components plant in St. Catharines, Ontario. While it appears that there may be a dose-response relationship, since the disease is caused by exposure to a fungus growing in the coolant system, it is possible that a simple measure of oil mists in the air may be insufficient to protect worker health. It seems prudent, therefore, that the proposed standard be as stringent as possible.

It has been our experience in Canadian workplaces that where a good effort has been made to control exposures such as enclosing machines and installing good local exhaust ventilation, exposures of 0.1 mg/m³ or less have been met.



Thank you for your consideration of our position on this matter.

Yours truly,

A handwritten signature in black ink that reads "Cathy Walker". The signature is written in a cursive style with a large, stylized "C" and "W".

CATHY WALKER
National Health and Safety Director

CW/hk
opeiu343

cc: B. Hargrove
J. O'Neil
G. Botic
M. Raymond
P. Dugal
J. Graham