



May 31, 1996

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

Dear Ms. Manning:

As President of the Maine Metal Products Association (MMPA) and an employee of a 50-person precision machine shop, I would like to take this opportunity to express my concern with regard to the draft *Criteria for a Recommended Standard: Occupational Exposures to Metalworking Fluids*.

MMPA is a trade association comprised of 178 metal products companies in the state of Maine including precision machine shops, metal fabricators, metal finishers. Although our membership includes large and small metal products companies, over 80 percent of the companies employ less than 50 persons. Almost all of these companies use metalworking fluids in their manufacturing operations.

Although worker health and environmental protection are at the top of our priority list, as evidenced by our Environmentally Conscious Manufacturing Project (see enclosed brochure), we feel that a 10-fold reduction in the standard for mineral oil mists would cause a devastating economic impact to our member companies. It must be remembered that small metal products companies, such as those represented by MMPA, can not be compared to large automotive companies in terms of resources available to modify and/or purchase new equipment that will minimize fluid mists. To comply with a 0.5 mg/m^3 standard, it is likely that companies would have to replace many of their existing machine tools. A relatively minor economic investment for a large automotive company could put one of our companies out of business. The metal products industry is Maine's second largest manufacturing sector and comprises over 450 facilities.

Finally, we would support a new standard if the data existed to definitively show that the new standard would result in a significant health benefit to our workers. Based on our review, however, it appears that there is still a great deal of controversy in the literature regarding potential health effects associated with exposure to metalworking fluids.

R E C E I V E D

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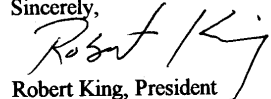
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Ms. Manning
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We appreciate the opportunity to provide you with some of our thoughts with regard to this issue which we feel is a very important one to our industry.

Sincerely,

A handwritten signature in black ink that reads "Robert King". The signature is written in a cursive style with a large, stylized "K".

Robert King, President
Maine Metal Products Association