



2030 DOW CENTER
June 11, 1996

The Dow Chemical Company
Midland, Michigan 48674

R E C E I V E D

JUN 14 1996

NIOSH DOCKET OFFICE

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:

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.

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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 cursive script that reads "Richard D. Olson".

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