



INDEPENDENT LUBRICANT MANUFACTURERS ASSOCIATION

June 24, 2014

President

Lon Fanning
Perkins Products, Inc.

Vice President

Barbara A. Bellanti
Battenfeld Grease & Oil
Corporation of N.Y.

Treasurer

Frank H. Hamilton III
South Atlantic Services, Inc.

Secretary

Beth Ann Jones
Hangsterfer's Laboratories, Inc.

Immediate Past President

Jarrett Flegel
Boss Lubricants

Executive Director

Celeste M. Powers, CAE

General Counsel

Jeffrey L. Leiter

By Electronic Mail

Dr. Yun Xie, Ph.D., NTP Designated Federal Official
Division of the National Toxicology Program
National Institute of Environmental Health Sciences
MD K2-03
P.O. Box 12233
Research Triangle Park, NC 27709

Re: Supplemental Comment on CIMSTAR® 3800

Dear Dr. Xie:

The Independent Lubricant Manufacturers Association (“ILMA”) submits this supplemental comment on the draft National Toxicology Program (“NTP”) Technical Report (“Report”) on the Toxicological Studies of CIMSTAR®3800 for which the peer review panel met on May 22, 2014. The following information is intended to address confusion that appears to have occurred regarding the material safety data sheet (“MSDS”) for CIMSTAR®3800.

Prior to February 2012, CIMCOOL Industrial Products (“CIMCOOL”) did not list formaldehyde condensate biocides on the MSDS for its products (including CIMSTAR®3800) that contained this material in their formulations. Based on increasing customer questions regarding the formaldehyde condensate biocides, CIMCOOL started listing them on the MSDS. This change to the CIMSTAR®3800 MSDS in February 2012 may have caused some confusion for the scientists involved with the NTP testing conducted on this product. As clarification, the product formulation for the CIMSTAR®3800 metalworking fluid concentrate was maintained without changes throughout the duration of the NTP testing program.

In addition, the triazine biocide was a component of CIMSTAR®3800 metalworking fluid concentrate throughout the duration of the NTP testing program. Oxazolidine biocides were never added to the CIMSTAR®3800 metalworking fluid concentrate.

Sincerely,

/s/

Celeste M. Powers, CAE
Executive Director

cc: Dr. Daniel Morgan, NTP
SHERA and MWF Committtees
Dr. John Howell
Jeffrey L. Leiter, Esq.

400 N. Columbus Street
Suite 201
Alexandria, VA 22314
phone: 703/684-5574
fax: 703/836-8503
email: ilma@ilma.org
web: www.ilma.org