



# Independent Lubricant Manufacturers Association

400 N. Columbus Street, Suite 201, Alexandria, VA 22314 • **p** 703.684.5574 • **f** 703.836.8503 • [www.ilma.org](http://www.ilma.org) • [ilma@ilma.org](mailto:ilma@ilma.org)

December 11, 2015

## *Via Electronic Mail and Overnight Delivery*

Dr. Yun Xie  
NTP Designated Federal Official  
Office of Liaison, Policy, and Review, DNTP, NIEHS  
P.O. Box 12233, MD-K2-03  
Research Triangle Park, North Carolina 27709

### **Re: NTP's Trim® VX Technical Report**

Dear Dr. Xie:

The Independent Lubricant Manufacturers Association (“ILMA” or “Association”) requests a 60-day extension of time for public comment on the National Toxicology Program’s (“NTP”) draft Technical Report (“TR”) for Trim® VX. NTP’s November 23, 2015 *Federal Register* notice (80 Fed. Reg. 72979 (Nov. 23, 2015)) states that the draft TR for Trim® VX “should be available” to the public by January 5, 2016, and that written comments must be submitted to NTP by February 2, 2016. The TR is scheduled for peer review on February 16, 2016.

ILMA’s members, including the manufacturer of Trim® VX, make and sell more than 75 percent of the metalworking fluids used in the United States. ILMA actively participated in the public comment and peer review phases of NTP’s technical review of another metalworking fluid, Cimstar® 3800.

A transparent process for the draft TR for Trim® VX is essential. Assuming that the draft TR for Trim® VX is made available on January 5, 2016, ILMA, its members and other stakeholders would have only 28 days to digest the TR and develop meaningful, written comments. This comment period is too short. Even if NTP makes available the draft TR for Trim® VX over the next two weeks, a significant number of ILMA member companies shutdown their operations entirely for the Christmas/New Year holiday. In addition, ILMA expects that the Association and its members will be involved with analyzing and commenting on draft risk assessments the Environmental Protection Agency said it will publish for public comment later this month on two substances widely used as extreme-pressure additives in metalworking fluids.

**President**

**Frank H. Hamilton III**  
South Atlantic  
Services, Inc.

**Vice President**

**Beth Ann Jones**  
Hangsterfer’s  
Laboratories, Inc.

**Treasurer**

**Dave P. Croghan**  
Maxum Petroleum

**Secretary**

**Barbara Kudis**  
Allegheny Petroleum  
Products Company

**Immediate Past  
President**

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

**Executive Director**

**Holly Alfano**

**General Counsel**

**Jeffrey L. Leiter**

Dr. Yun Xie  
December 11, 2015  
Page 2 of 2

Additionally, ILMA requests that NTP make copies available of working group reports, meeting minutes, and any other additional information or data that was previously generated on Trim® VX. This will provide the public, including ILMA and its members, with an opportunity to further review and understand NTP's data and methodology to help develop comments.

ILMA respectfully requests that NTP grant its requests as set forth above.

Sincerely,

[Redacted]

Holly Alfano  
Executive Director

cc: ILMA SHERA Committee  
ILMA MWF Committee  
John K. Howell, Ph.D.  
Jeffrey L. Leiter, Esq.  
Daniel T. Bryant, Esq.

**President**

**Frank H. Hamilton III**  
South Atlantic  
Services, Inc.

**Vice President**

**Beth Ann Jones**  
Hangsterfer's  
Laboratories, Inc.

**Treasurer**

**Dave P. Croghan**  
Maxum Petroleum

**Secretary**

**Barbara Kudis**  
Allegheny Petroleum  
Products Company

**Immediate Past  
President**

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

**Executive Director**

**Holly Alfano**

**General Counsel**

**Jeffrey L. Leiter**