



INDEPENDENT LUBRICANT MANUFACTURERS ASSOCIATION

June 24, 2014

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***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,

Celeste M. Powers, CAE  
Executive Director

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cc: Dr. Daniel Morgan, NTP  
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Jeffrey L. Leiter, Esq.