



No Sense

OSHA continues toward its goal of lowering the level of oil mist to which metalworking employees are exposed **by 90 percent**—from the current level of 5.0 mg/m³ to only 0.5 mg/m³. The agency's justification for this unrealistically low exposure level is rooted in decades-old data accumulated in large automotive plants—data that fails to reflect modern oil fluid formulations and improved mist management.

Further, the studies completely ignore the practices of small metalworking facilities, which differ in their usage and management of fluids. Yet the small metalworking companies will bear the brunt of such a dramatically restrictive regulation.

Has OSHA identified a long-festering problem that afflicts small metalworkers? Nope. There is precisely no record of illnesses related to oil mists in small businesses. The little testing the government has done in small facilities shows results in the 1.0 mg/m³ range.

Actually, Precision Metalforming Association did a study of OSHA 200 Illness and Injury Log summaries last year. It showed that the risk of injury from using toilet bowl cleaner is seven times greater than the risk of contracting respiratory disease through occupational exposure to metalworking fluids. If there's an OSHA standard regulating the use of toilet bowl cleaner I'm unaware of it.

It's not as if the proposed oil mist regulation would present no economic consequences to industry—particularly small manufacturers. Apparently there would be two ways to comply with the proposed regulation—install enclosures and ventilation, or replace machines.

Let's examine the first alternative. Adequately retrofitting older machines with enclosures and ventilation would cost \$11,750 per machine, according to the

United Auto Workers union. It is estimated by several knowledgeable sources that there are somewhere between 1,100,000 and 1,500,000 metalcutting machines over ten years of age in current use.

Doing the math produces a mandated cost to industry of between \$13 billion and \$18 billion for a solution that may or may not be adequate to solve a problem that doesn't exist.

The second alternative—replacing existing equipment with new machinery—is even less acceptable. It is estimated that to replace all machines over 10 years of age would cost industry between \$150 billion and \$200 billion, and take 30 to 40 years.

Regardless of whether the estimates are anywhere near accurate, the economic impact of the recommended level of 0.5 mg/m³ would be a federal folly of mega-dimensional proportions. And it would be devastating to industry—particularly small businesses. (And the estimates don't include the cost of medical monitoring programs, respirators and record keeping.)

Why does OSHA pursue a regulatory prescription that would threaten to kill the patient while inventing a cure for a disease that doesn't exist?

Some claim that it's because the UAW is petitioning for it. Others suggest that it's simply our unelected fourth branch of government seeking fulfillment through an expanding regimen of control. Either way it makes no sense.

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