



# Standard Practice for Prevention of Dermatitis in the Wet Metal Removal Fluid Environment<sup>1</sup>

This standard is issued under the fixed designation E2693; the number immediately following the designation indicates the year of original adoption or, in the case of revision, the year of last revision. A number in parentheses indicates the year of last reapproval. A superscript epsilon ( $\epsilon$ ) indicates an editorial change since the last revision or reapproval.

## 1. Scope

1.1 This practice sets forth guidelines for reducing dermatitis caused by exposure to the wet metal removal environment. The scope of this practice does not include exposure to chemicals that enter the body through intact skin (cutaneous route), which has the potential to cause other toxic effects.

1.2 This practice incorporates means and mechanisms to reduce dermal exposure to the wet metal removal environment and to control factors in the wet metal removal environment that have the potential to cause dermatitis.

1.3 This practice focuses on employee exposure to the skin via contact and exposure to metal removal fluid (MRF).

1.4 The values stated in inch-pound units are to be regarded as standard. The values given in parentheses are mathematical conversions to SI units that are provided for information only and are not considered standard.

1.5 ~~The values stated in inch-pound units are to be regarded as standard. The values given in parentheses are mathematical conversions to SI units that are provided for information only and are not considered standard. This standard does not purport to address all of the safety concerns, if any, associated with its use. It is the responsibility of the user of this standard to establish appropriate safety and health practices and determine the applicability of regulatory limitations prior to use.~~

## 2. Referenced Documents

### 2.1 ASTM Standards:<sup>2</sup>

- [D1356 Terminology Relating to Sampling and Analysis of Atmospheres](#)
- [D2881 Classification for Metalworking Fluids and Related Materials](#)
- [E1302 Guide for Acute Animal Toxicity Testing of Water-Miscible Metalworking Fluids](#)
- [E1370 Guide for Air Sampling Strategies for Worker and Workplace Protection](#)
- [E1497 Practice for Selection and Safe Use of Water-Miscible and Straight Oil Metal Removal Fluids](#)
- [E1542 Terminology Relating to Occupational Health and Safety](#)
- [E1972 Practice for Minimizing Effects of Aerosols in the Wet Metal Removal Environment](#)
- [E2144 Practice for Personal Sampling and Analysis of Endotoxin in Metalworking Fluid Aerosols in Workplace Atmospheres](#)
- [E2148 Guide for Using Documents Related to Metalworking or Metal Removal Fluid Health and Safety](#)
- [E2169 Practice for Selecting Antimicrobial Pesticides for Use in Water-Miscible Metalworking Fluids](#)
- [E2250 Method for Determination of Endotoxin Concentration in Water Miscible Metal Working Fluids \(Withdrawn 2008\)<sup>3</sup>](#)
- [E2525 Test Method for Evaluation of the Effect of Nanoparticulate Materials on the Formation of Mouse Granulocyte-Macrophage Colonies](#)
- [E2889 Practice for Control of Respiratory Hazards in the Metal Removal Fluid Environment](#)

### 2.2 OSHA Standards:<sup>4</sup>

- [29 CFR 1910.132 Personal Protective Equipment: General Requirements](#)
- [29 CFR 1910.133 Eye and Face Protection](#)

<sup>1</sup> This practice is under the jurisdiction of ASTM Committee E34 on Occupational Health and Safety and is the direct responsibility of Subcommittee E34.50 on Health and Safety Standards for Metal Working Fluids.

Current edition approved July 1, 2009; Sept. 1, 2014. Published August 2009; September 2014. Originally approved in 2009. Last previous edition approved in 2009 as E2693 – 09. DOI: ~~10.1520/E2693-09~~; 10.1520/E2693-14.

<sup>2</sup> For referenced ASTM standards, visit the ASTM website, [www.astm.org](http://www.astm.org), or contact ASTM Customer Service at [service@astm.org](mailto:service@astm.org). For *Annual Book of ASTM Standards* volume information, refer to the standard's Document Summary page on the ASTM website.

<sup>3</sup> The last approved version of this historical standard is referenced on [www.astm.org](http://www.astm.org).

<sup>4</sup> Available from U.S. Government Printing Office Superintendent of Documents, 732 N. Capitol St., NW, Mail Stop: SDE, Washington, DC 20401, <http://www.access.gpo.gov>.

29 CFR 1910.134 Respiratory Protection  
 29 CFR 1910.138 Hand Protection  
 29 CFR 1910.1048 Formaldehyde  
 29 CFR 1910.1200 Hazard Communication  
 29 CFR 1910 Appendix B to Subpart I Non-mandatory Compliance Guidelines for Hazard Assessment and Personal Protective Equipment Selection

2.3 Other Documents:

ANSI B11 TR 2–1997 Mist Control Considerations for the Design, Installation and Use of Machine Tools Using Metalworking Fluids<sup>5</sup>

### 3. Terminology

3.1 For definitions and terms relating to this practice, refer to Terminology Standards **D1356** and **E1542**.

3.2 *Definitions of Terms Specific to This Standard:*

3.2.1 *contaminant, n*—substances contained in in-use metal removal fluids that are not part of the received fluid, such as abrasive particles, tramp oils, cleaners, dirt, metal fines and shavings, dissolved metal and hard water salts, bacteria, fungi, micro biological decay products, and waste. **E1497**

3.2.2 *control, v*—to prevent, eliminate, or reduce hazards related to use of metal removal fluids in metal removal processes and to provide appropriate supplemental ~~and/or~~ interim protection, or both, as necessary, to employees. **E1497**

3.2.3 *dermatitis, n*—an inflammatory response of the skin.

<sup>5</sup> Available from American National Standards Institute (ANSI), 25 W. 43rd St., 4th Floor, New York, NY 10036, <http://www.ansi.org>.

3.2.3.1 *Discussion*—

Dermatitis can result from a wide variety of sources and processes. The most common origins are irritant or allergic responses to a chemical or physical agent. Signs and symptoms that typify the initial onset of dermatitis include: erythema (redness); edema (swelling); pruritis (itching); and vesiculation (pimple-like eruptions). In more severe cases, fissures (deep cracks) and ulcers (open sores) can develop. The condition is usually reversible when exposure to the causative agent ceases. More severe cases can require more time and some medical attention. Some individuals can be at higher risk. **E2525**

3.2.4 *dilution ventilation, n*—referring to the supply and exhaust of air with respect to an area, room, or building, the dilution of contaminated air with uncontaminated air for the purpose of controlling potential health hazards, fire and explosion conditions, odors, and nuisance type contaminants, from *Industrial Ventilation: A Manual of Recommended Practice*.<sup>6</sup>

3.2.5 *emergency, n*—any occurrence, such as but not limited to equipment failure, rupture of containers, or failure of control equipment that results in an uncontrolled release of a significant amount of metal removal fluid. **E1497**

3.2.6 *employee exposure, n*—contact with the metal removal fluid, components and contaminants by inhalation, skin contact, eye contact, or accidental ingestion.

3.2.7 *extractable mass, n*—the material removed by liquid extraction of the sampling filter using a mixed-polarity solvent mixture as described in Test Method PS 42.

3.2.8 *folliculitis, n*—an inflammatory response to excess oil in hair follicles. **E1497**

3.2.9 *metal removal fluid (MRF), n*—any fluid in the subclass of metalworking fluids used to cut or otherwise take away material or piece of stock. **E2148**

<sup>6</sup> Available from American Conference of Governmental Industrial Hygienists, Inc. (ACGIH), 1330 Kemper Meadow Dr., Cincinnati, OH 45240, <http://www.acgih.org>.

3.2.9.1 *Discussion*—

Metal removal fluids include straight or neat oils (Classification **D2881**), not intended for further dilution with water, and water-miscible soluble oils, semisynthetics, and synthetics, which are intended to be diluted with water before use. Metal removal fluids become contaminated during use in the workplace with a variety of workplace substances including, but not limited to, abrasive particles, tramp oils, cleaners, dirt, metal fines and shavings, dissolved metal and hard water salts, bacteria, fungi, microbiological decay products, and waste. These contaminants can cause changes in the lubricity and cooling ability of the metal removal fluid as well as have the potential to adversely affect the health and welfare of employees in contact with the contaminated metal removal fluid. **E2148**

3.2.10 *metal removal fluid aerosol, n*—Aerosol generated by operation of the machine tool itself as well as from circulation and filtration systems associated with wet metal removal operations and can include airborne contaminants of a microbial origin. **E1972**

3.2.10.1 *Discussion*—

Metal removal fluid aerosol does not include background aerosol in the workplace atmosphere, which can include suspended insoluble particulate. **E2525**

3.2.11 *metal removal process, n*—a manufacturing process that removes metal during shaping of a part, including machining processes, such as milling, drilling, turning, broaching, and tapping, and grinding processes, as well as honing and lapping, and other similar mechanical operations in which metal is removed to produce a finished part.

3.2.12 *total particulate matter, n*—the mass of material sampled through the 4-mm inlet of a standard 37-mm filter cassette when operated at 2.0 L/min, as described in Test Method PS 42.

3.2.12.1 *Discussion*—

As defined in Test Method PS 42, total particulate matter is not a measure of the inhalable or thoracic particulate mass.

3.2.13 *tramp oil, n*—oil and oil-soluble additives, sometimes insoluble, resulting from leaking hydraulic or gear oil, or sacrificial spindle oil or slide way lubricant, that contaminate the metal removal fluid. **E1497**

3.2.13.1 *Discussion*—

Tramp oils can contaminate the metal removal fluid with components that are emulsifiable but which were not part of the metal removal fluid as formulated. **E2525**

3.2.14 *wet metal removal fluid environment, n*—the workplace environment in which wet metalworking operations occur. **E1497**

#### **4. Routes of Metal Removal Fluid Exposure and Effects of Overexposure**

4.1 Routes of exposure to metal removal fluids include inhalation, ingestion, eye contact, and dermal contact. This practice focuses on exposure through dermal contact with the fluid, contact with residual fluid on machinery, parts, or clothing, and in some cases contact with fluid mists, splashes, or aerosols. Refer to Practice E2889 for information about the health risks related to inhalation exposure and guidance on how to reduce these risks.

4.2 Prolonged or repeated dermal contact can cause dry and cracked skin, rash, redness, burning, or itching. Skin abrasions can intensify the effects. Some metal removal fluids and additives can sensitize the skin of affected employees, which can result in a response to very low levels of exposure. This practice defines dermatitis as an inflammatory response to the skin. Dermatitis can result from a wide variety of sources and processes. The most common origins are irritant or allergic responses to a chemical or physical agent. Signs and symptoms that typify the initial onset of dermatitis include: erythema (redness); edema (swelling); pruritis (itching); and, vesiculation (pimple-like eruptions). In more severe cases, fissures (deep cracks) and ulcers (open sores) can develop. The condition is usually reversible when exposure to the causative agent ceases. More severe cases can require more time and some medical attention.

4.3 Aerosols, mist, and vapors can contact and expose the skin as well as contaminate clothing.

#### **5. Significance and Use**

5.1 Use of this practice is intended to reduce occupational dermatitis caused by exposure to the wet metal removal environment.

5.2 Complaints of dermatitis conditions are often associated with exposures to metal removal fluid.

5.3 Implementation of this practice and incorporation of metal removal fluid management program has the potential to reduce complaints of occupational dermatitis. Elements of an effective program include: understanding dermatitis and associated causes; prevention of dermatitis and exposure to metal removal fluids; appropriate product selection; good management of additives, microorganisms, and fluids; appropriate additive (including antimicrobial pesticides) selection and additive control; appropriate tool design and assessment and control of metal removal fluid exposures including aerosols.

#### **6. Dermatitis and Associated Causes**

6.1 *Discussion*—Dermatitis can result from a wide variety of sources and processes. The most common origins are irritant or allergic responses to a chemical or physical agent. Signs and symptoms that typify the initial onset of dermatitis include: erythema (redness); edema (swelling); pruritis (itching); and, vesiculation (pimple-like eruptions). In more severe cases, fissures (deep cracks) and ulcers (open sores) can develop. The condition is usually reversible when exposure to the causative agent ceases. More severe cases can require more time and some medical attention.

6.2 Some examples of occupational dermatitis include:

- 6.2.1 Irritant contact dermatitis (from irritant chemicals or physical irritants)
- 6.2.2 Allergic contact dermatitis,
- 6.2.3 Folliculitis (oil acne),
- 6.2.4 Dyshydrotic eczema,
- 6.2.5 Keratoses,
- 6.2.6 Eczema,
- 6.2.7 Skin warts,
- 6.2.8 Pigment disorders,
- 6.2.9 Granuloma,
- 6.2.10 Erythematous papules,
- 6.2.11 Papulovesicles,
- 6.2.12 Chronic lichenified,
- 6.2.13 Fissured palmar eczema,
- 6.2.14 Discoid eczema,
- 6.2.15 Psoriasis,
- 6.2.16 Skin infections,
- 6.2.17 Skin burns,
- 6.2.18 Skin microtrauma and mechanical injury,
- 6.2.19 Itchy nummular dermatitis.

6.3 Dermatitis resulting from exposure to metal removal fluids is usually either irritant contact dermatitis or allergic contact dermatitis. See Section 3, Terminology.

6.4 Irritant contact dermatitis can be caused by two mechanisms, chemical and physical abrasion. Examples of a chemical mechanism include metal removal fluid concentrates, higher than recommended in-use metal removal fluid concentrations, high alkalinity and solvents. Examples of physical abrasion include exposure to physical irritants such as metal shavings, turnings, or fines contained in the fluid from a malfunctioning filter; fines in dirty shop rags; and hand washing with abrasive soaps.

6.5 Allergic contact dermatitis can be caused by exposure of sensitive individuals to certain metal contaminants (for example, chromium, cobalt, or nickel) dissolved or suspended in the metal removal fluid, or to certain ingredients, including some antimicrobials or odorants. Some workers are sensitized to contaminants.

6.6 Microorganisms can grow in all metal removal fluids, often producing an unpleasant odor. Unless open cuts, wounds or severe dermatitis are already present, microorganisms which commonly grow in water miscible metal removal fluids are not frank pathogens and are not normally associated with onset of dermatitis.

6.7 The greater the concentration or duration of exposure to an irritant, the greater the possibility for skin irritation to develop or for skin sensitization to develop in sensitive individuals.

6.8 Consider activities outside work, such as gardening, painting, or car repair, which can contribute to dermatitis, when investigating potential dermatitis causes.

6.9 Any material or activity that abrades the skin or removes natural oils from skin can cause dermatitis or predispose skin to its onset. Environmental factors such as dry air, extreme cold and changing humidity, or idiopathic factors, such as normal aging, can also predispose the skin to dermatitis.

6.10 Folliculitis (oil acne) can be caused by use of straight oils without proper skin protection.

6.11 Finding the cause of a worker's case of dermatitis can be a long laborious process. Detecting an occupational dermal causative agent requires cooperation from the patient, the metal removal fluid manufacturer, workplace management, and specialized medical expertise.

6.12 Poor personal hygiene both on and off the job can influence development of dermatitis.

6.13 Dermatitis causation varies with worker population demographics. The frequency of exposure, the concentration of exposure, a ~~person's~~ person's predisposition to specific dermatitis, etc. with metal removal fluids all influence the outcome if dermatitis will develop. Occupational dermatitis exposure focuses on the hands, especially on the dorsal part of the hands as well as the bony prominences, the lateral sides of the fingers, and finger webs where fluids tend to be retained if hands are not cleansed properly

6.14 Occupational dermatitis has sometimes been associated with exposure to as-received metal removal fluid concentrates as well as to in-use metal removal fluids.

6.14.1 Lack of management of and maintenance of metal removal fluid systems is the most significant contributor to occupational dermatitis associated with exposure to metal removal fluids.

6.14.2 Excess tramp oil, which can carry metallic fines, can cause dermatitis, due to mechanical abrasion of the skin with the carried fines.

6.14.3 Water-miscible metal removal fluids that are not carefully controlled for concentration or which contain higher than recommended concentrations of additives can be much more irritating than fluids that are operating at the manufacturer's recommended concentration.

6.14.4 Malfunctioning or insufficient filters can increase suspended particulate, such as grinding turnings, abrasive wheel residue, and metallic fines.

6.14.5 Contamination of the metal removal fluid by dissolved metals, such as nickel, cobalt, and chromium, other abrasive particulates, or alkaline materials, such as in-process cleaners, increase occurrences of occupational dermatitis.

6.14.6 Causes of dermatitis associated with the metal removal environment include chemicals such as additives and antimicrobial pesticides. Antimicrobial pesticides are often incorporated into water-miscible metal removal fluid formulations and are commonly added to machine sumps and to centralized water-miscible metal removal fluids to control microbial growth. See Practice [E2169](#) for further guidance. Antimicrobial pesticides must be used in accordance with manufacturer's label instructions. Some antimicrobial pesticides are corrosive and appropriate personal protective equipment must be worn to prevent skin or eye injury. Other antimicrobial pesticides, if over used, can cause allergic contact dermatitis.

6.14.7 Examples of chemical causes of dermatitis include agents such as 1,2-dibromo-2,4-dicyanobutane, triazine, metal filings, strong detergents in hand washing, para-phenylenediamine, formaldehyde, neomycin, thiuram, mercaptobenzothiazole, ethylenediamine, fragrances, and some antimicrobial pesticides. This is not an inclusive list. Even metal removal fluids with similar alkalinity show different irritant skin reactions due to their chemical components. Other potential agents include corrosion inhibitors, coupling agents, and emulsifiers. The type of fluid is important. For example, straight mineral oils can have higher levels of fines than water-mix fluids.

## 7. Metal Removal Fluid Management Program

7.1 Management of metal removal fluids is the most important step in improving fluid life and reducing the occurrence of dermatitis and other occupational hazards. Health risks and economic losses are enormous when large, centralized metal removal fluid systems get out of control compared to the effort required to maintain control and chemical stability. On the other hand, small systems can get out of control with haphazard, inappropriate, or poorly timed additions and dilutions. A systems approach to metal removal process management is recommended and includes some or all of the following program elements:

- 7.1.1 Water treatment (Section [8](#)),
- 7.1.2 Product selection (Section [9](#)),
- 7.1.3 Additive selection and control (Section [10](#)),
- 7.1.4 Machine tool design, selection, and maintenance (Section [11](#)),
- 7.1.5 Work layout and design (Section [12](#)),
- 7.1.6 Safe work practices and PPE (Section [13](#)),
- 7.1.7 Assessment (Section [14](#)),
- 7.1.8 Process control (Section [15](#)),
- 7.1.9 Education and training (Section [16](#)),
- 7.1.10 Medical, industrial hygiene, and administrative controls (Section [17](#)),
- 7.1.11 Emergency preparedness (Section [18](#)).

7.2 Metal removal fluid management programs can be easily integrated with process control requirements of quality systems such as ISO 9001 or QS-9000.

7.3 Additional detailed guidance is provided in Practices [E1497](#) and [E2889](#) and in *Metal Removal Fluids, A Guide To Their Management and Control*, and in *Metalworking Fluids: Health & Safety Best Practices Manual*.<sup>7</sup> Consult with your metal removal fluid suppliers.

7.4 It is important that the management program include a continuous improvement plan to control for dermatitis.

## 8. Water Treatment

8.1 Water constitutes more than 90 % of the diluted water miscible metal removal fluid mixture. Water shall be evaluated for hardness, alkalinity, high conductivity, turbidity, corrosivity, biological contaminants, and other factors that can lead to increased use of metal removal fluid concentrate, additives, or antimicrobials, or a combination thereof. Good water quality is fundamental to proper metal removal fluid use, will help reduce use of additives and antimicrobials, and lengthen fluid life. Consult your metal removal fluid supplier, chemical manager and corporate subject matter expert.

8.2 Where suitable water is not available, use a water treatment program to produce enough water of sufficient quality for metal removal fluid use. Treated water ~~should~~ needs to be readily available from holding tanks large enough to meet anticipated daily

<sup>7</sup> Available from National Center for Manufacturing Sciences, Report 0274RE95, 3025 Boardwalk, Ann Arbor, MI 48018.

<sup>7</sup> Available from Occupational Safety and Health Administration (OSHA), 200 Constitution Ave., NW, Washington, DC 20210, or at [http://www.osha.gov/SLTC/metalworkingfluids/metalworkingfluids\\_manual.html](http://www.osha.gov/SLTC/metalworkingfluids/metalworkingfluids_manual.html).

requirements. Treated water quality, including biological contaminants, must be monitored. Tests performed depend on the type of water treatment used. Guidance on water quality and water treatment is often available from the metal removal fluid manufacturer.

## 9. Product Selection

9.1 Proper product selection is fundamentally critical to reducing or eliminating respiratory conditions and occupational dermatitis associated with exposure to metal removal fluids. The goal is for metal removal fluids to perform as intended while providing the safest working conditions. The selection of a metal removal fluid for each different operation must consider the inherent limitations of the product. Water-miscible fluids not properly selected are likely to be used at higher concentrations than other products more appropriate to the operation.

9.1.1 Consult *Metal Removal Fluids, A Guide to Their Management and Control* and *Metal Working Fluid Optimization Guide*<sup>8</sup> for further information on selecting the proper fluid for the application. In addition, your fluid supplier, chemical manager or corporate subject matter expert could provide information on the proper selection of the appropriate fluid and recommended concentration for use.

9.2 Potential health hazards can be reduced by careful fluid selection and substitution. See Guide E1302 and consult *Metalworking Fluids: Safety and Health Best Practices Manual* for further information.

9.3 Before the fluid is handled, the user shall have an accurate and current material safety data sheet as required by the OSHA Hazard Communication Standard. See 29 CFR 1910.1200. Precautions shall be taken to ensure the fluid is, without modification, the fluid represented in the material safety data sheet. The metal removal fluid manufacturer's material safety data sheet (MSDS) and toxicological data must be complete and must provide all applicable information on metal removal fluids, ingredients, and additives and this data shall be reviewed in order to evaluate potential hazards and establish appropriate control procedures.

9.4 The metal removal fluid manufacturer must provide all applicable health, safety and toxicological data on Additives, including rust inhibitors, product stabilizers, and antimicrobials of all types, odorants, and dyes. These data shall be reviewed for their impact on the metal removal fluid mixture to which they are added. Additives shall only be used with the agreement of the metalworking fluid manufacturer and the appropriate health and safety personnel in the plant.

9.5 As supplied, antimicrobials and other additives for tank side addition can present greater health and safety risks than the metal removal fluid. Further, additives and antimicrobials are less likely to be handled automatically, or with special delivery equipment, than metal removal fluid concentrate so greater care and attention are required to reduce risks of exposure.

9.5.1 To avoid recognized health and safety hazards, MRF formulations shall not contain nitrites or nitrosating agents, petroleum oils that are not severely refined, chlorinated paraffins that have been identified as carcinogens, and other constituents listed in applicable purchase specifications.

9.5.2 All applicable disposal criteria must be met. If there is on-site wastewater treatment plant, consult with the operator at time of fluid selection.

9.6 For information on selection and safe use of metal removal fluids, additives, and antimicrobials including product selection, storage, dispensing, and maintenance, refer to Practices E1497 and E2169.

9.7 Workers are not only exposed to components in these metal removal fluids but also frequently to antimicrobial pesticides that have been implicated in occupational irritant dermatitis.

9.8 Fluids vary in their characteristics and chemical components as well as in their misting characteristics. Select fluids with an understanding of their misting characteristics, bearing in mind available engineering control measures. Some fluids mist less, other factors being equal. Misting characteristics can change significantly with contamination. Some fluids retain entrained air, causing a significant increase in mist generation, possibly in areas away from the metal removal fluid operation. Polymeric additives can be useful in reducing aerosol from straight or neat oils and some water-miscible metal removal fluids. Components or contaminants can be more concentrated in the aerosol phase relative to their concentrations in the bulk fluid.

9.9 Practice E1497 and *Metal Removal Fluids, A Guide To Their Management and Control*<sup>9</sup> describe product selection criteria. While specifically directed towards water-miscible metalworking fluids, the same principles generally apply to selection of neat or straight metal removal fluids.

9.10 Select fluids with an understanding of their acute and chronic toxicity characteristics. Guide E1302 references procedures to assess the acute toxicity of water-miscible metalworking fluids as manufactured. Review the material safety data sheet, required by 29 CFR 1910.1200, for health and safety information for the metal removal fluids being considered for the operation.

9.11 With due consideration for available engineering controls, select fluids that minimize components that can be irritating or can produce objectionable odors.

<sup>8</sup> Available from National Center for Manufacturing Sciences, Report 0274RE95, 3025 Boardwalk, Ann Arbor, MI 48018.

<sup>9</sup> Available from Organization Resources Counselors, 1910 Sunderland Place, NW, Washington, DC 20036 or from members of the Metal Working Fluid Product Stewardship Group (MWFPSG). Contact Independent Lubricant Manufacturers Association, 400 N. Columbus Street, Suite 201, Alexandria, VA 22314, for a list of members of the MWFPSG.