EASTMAN

July 18, 2011

Michael Babich, Ph.D.
Directorate for Health Sciences
U.S. Consumer Product Safety Commission
4330 East West Highway
Bethesda, MD 20814

Re: CPSC Phthalates CHAP Feedback on Public Presentation by Ammie Bachman, Ph.D. (ExxonMobil)

Dear Dr. Babich,

During the CPSC Phthalates CHAP meeting on July 26, 2010 held in Bethesda, MD, a presentation given by Ammie Bachman, Ph.D. from ExxonMobil inaccurately and unfairly characterized Eastman 168 as having reproductive toxicity concerns.

Specifically, on slide # 4 of the presentation entitled "DINP and DIDP," the summary table of toxicology information lists the following information for DOTP, a synonym for Eastman 168:

> "Reproductive - Lactational Maternal Death (> 1300 mg/kg)"

We believe this to be an inaccurate and unfair representation of the actual data, which show a low level of risk regarding the reproductive toxicity of Eastman 168.

The inclusion of lactational maternal death as a reproductive endpoint is incorrect, as lactational maternal death is a measure of acute maternal toxicity. In addition, a comparison of the exposure levels of Eastman 168 in a 2-generation reproductive toxicity study suggests that the toxicological risk is comparable to DINP and DIDP.

In a 2-generation reproductive toxicity study of Eastman 168, the No Observed Adverse Effects Level (NOAEL) for reproductive toxicity was a dietary exposure of 10,000 ppm, the highest exposure tested. Because Eastman 168 was administered via dietary consumption, the actual dose levels were calculated based on amount of feed consumed. During all phases of the study, the actual dose levels in males and females in the 10,000 ppm group ranged from 447 mg/kg/day (post-breeding in males) to 1,349 mg/kg day (during lactation in females). The No Observed Effect Level (NOEL) for parental toxicity of 614 mg/kg/day (combined sexes) reported in:

> W. D. Faber, J. A. Deyo, D. G. Stump, and K. Ruble. Two-generation reproduction study of di-2-ethylhexyl terephthalate in Crl:CD rats. Birth Defects Res.B Dev.Reprod.Toxicol. 80 (2):69-81, 2007.

supports the conclusion that Eastman 168 has a similar reproductive toxicity risk as DINP and DIDP, both of which were presented as "negative" in that same table (What is the NOAEL for these chemicals? If we comment we have similar reproductive risk we should state their NOAEL's for comparison). The NOEL presented in the above citation is a more conservative estimate of toxicity risk than the NOAELs presented for DINP and DIDP, and the Eastman 168 NOEL value is roughly comparable to the DINP and DIDP NOAELs.

Eastman Chemical Company takes consumer safety very seriously, therefore the toxicology of Eastman 168 was very thoroughly investigated prior to marketing and Eastman Chemical Company believes that Eastman 168 has a very favorable toxicological profile.

We would like to thank the CPSC in advance for the opportunity to correct this misrepresentation, and possible misinterpretation of reproductive toxicology of Eastman 168.

Sincerely,

Mark Holt

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