ALBEMARLE®
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March 7, 2013

Dr. Ruth Linn
Director
Office of the Report on Carcinogens
National Toxicology Program
National Institute of Environmental Health Sciences
P.O. Box 12233, MD K2-14
Research Triangle Park, NC 27709

Re: Request for Public Comment on Nominations to the RoC

Dear Dr. Linn:

Albemarle Corporation is a global developer and manufacturer of specialty chemicals headquartered in Baton Rouge, Louisiana. One of the many bromine based chemicals produced by Albemarle Corporation is n-Propyl bromide manufactured at our Magnolia, Arkansas site. We export n-Propyl bromide into Europe, where it is used in the synthesis of an anticonvulsant and mood-stabilizing drug, in the treatment of epilepsy amongst others. We also commercially sell n-Propyl bromide globally for use as a precision cleaning solvent in vapor degreasing systems. Albemarle supports only the non-emissive, authorized uses of the EPA Significant New Alternatives Policy (SNAP).

Albemarle emphasizes Product Stewardship and provides the appropriate training to our Distributors to emphasize the safe use of nPB in approved applications. We work with major producers of precision cleaning equipment to ensure that our ABZOL® nPB cleaners function safely and efficiently in their systems. As part of our Product Stewardship program, exposure monitoring is conducted at no cost to our customers through the use of passive sampling badges.

Passive sampling badges provide a simple, reliable method for air sampling to determine worker exposure. These badges carry full validation from the supplier (SKC) and have passed all NIOSH protocol validation requirements. This is a rigorous validation test and includes all parameters that can affect sampling accuracy. Albemarle provides these badges to customers and highly recommends their use to first-time customers to establish baseline data. Subsequent to their use, badges are analyzed according to NIOSH Sampling Method by an independent third party. If results indicate a potential for exposure above our recommended level, a site visit is made to observe work practices. A photoionization detector (PID) is useful in detecting equipment leaks, identifying source emissions, and evaluating work practices. Based

on these observations, recommendations are made to reduce potential exposure. Experience has shown that by following standard work practices the risk of exposure can be significantly reduced. A regular maintenance program keeps the vapor degreaser, a type of precision cleaning equipment, functioning properly, reducing the potential for exposure (as well as optimizing its cleaning performance). Vapor degreaser models introduced during the past 10+ years feature a fully-enclosed, automated system, further reducing emissions and potential for worker exposure.

ABZOL nPB formulated cleaners replace many of the chlorinated solvents such as perchloroethylene (PCE) and trichloroethylene (TCE) – two substances classified as high hazard substances. When assessing potential alternatives, the alternative should be chosen not only on the basis of ODP but their overall impact to climate change including energy efficiency and GWP. nPB has significant advantages compared to other known alternatives: lower energy costs due to lower boiling point and reduced drying time, low Global Warming Potential (GWP) of 0.31 for 100 years – to put this in context the 100 year GWP value for CFC-113 is 6000, for methyl chloroform 144, and for HCFC-141b 700 and CO_2 is 1.0, and reduced water consumption.

Thank you in advance for seeking industry comments, and for providing an opportunity for producers and users of 1-Bromopropane to provide additional pertinent information to the committee for further consideration.

Sincerely,
[Redacted]

Tina D. Craft
Global Business Manager