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March 6, 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:

Recently the Japan Society for Occupational Health (JSOH) gave an opinion regarding the mutagenicity of 1-bromopropane that the evidence suggests that 1-bromopropane is not a direct acting mutagen, i.e., that 1-bromopropane exposure does not damage DNA directly. According to standard carcinogenesis theory, the tumorigenic response noted in the NTP mouse and rat inhalation study can be assumed to possess a threshold, under which 1-bromopropane exposure would not be expected to be carcinogenic.

Albemarle supports the manufacture of 1-bromopropane for "non-emissive" purposes that are consistent with very low levels of workplace exposure. The "non-emissive" uses supported are consistent with the uses authorized by the EPA Significant New Alternatives Policy (SNAP).

Albemarle also supports a workplace air monitoring program to assist customers in minimizing worker exposure to 1-bromopropane. The exposure monitoring is conducted at no cost to our customers through the use of passive sampling badges. Passive sampling badges carry full validation from the supplier (SKC) and have passed all NIOSH protocol validation requirements.

Based on the reasonableness of the existence of a threshold for 1-bromopropane carcinogenicity, and the low levels found in well controlled non-emissive workplaces, our current opinion is that the classification of 1-bromopropane by NTP as reasonably anticipated to be a human carcinogen is overly conservative.

Sincerely,

[Redacted]

Carr J Smith, PhD, DABT
Toxicology Advisor
Health, Safety & Environment