



Chemtura Corporation
199 Benson Road
Middlebury, CT USA

Dr. Ruth Lunn
Director, Office of the Report on Carcinogens
DNTP, NIEHS
P.O. Box 12233
Research Triangle Park, NC 27709

November 4, 2015

Re: Request for Public Comment on PBDE Nomination to the RoC

Dear Dr. Lunn:

Thank you for the opportunity to comment on the nomination of the pentabromodiphenyl ether mixture identified by the commercial name "DE-71" in Vol. 80, No.194 of the Federal Register, issued on October 7, 2015. In the Federal Register, NTP requests information on "DE-71" production and use patterns, recent studies related to the mixture and names of scientific experts that are familiar with the mixture.

Great Lakes Chemical Corporation was the only known U.S. manufacturer of the chemical mixture named as "DE-71" in the Federal Register notice. At that time, "DE-71" was used as a flame retardant to reduce the ignitability of flexible polyurethane foam used primarily to manufacture furniture. In discussions with U.S. E.P.A., Great Lakes Chemical Corporation voluntarily stop manufacturing "DE-71" in 2004 and stopped the distribution of DE-71 in 2005.

To the best of our knowledge the pentabromodiphenyl ether chemical mixture identified under the name "DE-71" in the Federal Register is no longer being produced and has not been produced for the last 10 years since the product was withdrawn from the market.

Because DE-71 is no longer in use or available and has not been used by manufacturers for roughly 10 years, we would offer that further evaluation of the "DE-71" chemical mixture by NTP is unnecessary.

Again, we appreciate the opportunity to comment.

Regards,

Redacted

Stephen C. Scherrer
Advocacy and Product Stewardship Manager
Great Lakes Solutions, a Chemtura business