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September 15, 2003

Dr. Scott Masten  
Office of Chemical Nomination and Selection  
NIEHS/NTP  
P.O. Box 12233,  
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Research Triangle Park  
North Carolina, 27709

✓ Via Facsimile: 919-541-3647 9/15/03  
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*Rec'd 9/15/03*

**RE: Announcement and Request for Public Comments on Substances Nominated to the National Toxicity Program (NTP) for Toxicological Studies and on Study Recommendations Made by the NTP Interagency Committee for Chemical Evaluation and Coordination (ICECC) [68 FR 42068]**

Dear Dr. Masten:

Albemarle Corporation is submitting the following comments in response to the request for public comments on substances nominated to the National Toxicity Program (NTP) for toxicological studies and on testing recommendations made by the Interagency Committee for Chemical Evaluation and Coordination (ICECC). Our comments are in addition to comments previously submitted by the IPC - Association Connecting Electronics Industries and by the Brominated Flame Retardant Industry Panel (BFRIP) regarding the nomination of tetrabromobisphenol A [CAS 79-94-7] to the NTP. Albemarle Corporation is a member of both of these organizations and we have reviewed and are in agreement with the comments submitted by the two groups in response to the request for public comments.

Albemarle Corporation is one of the leading manufacturers and distributors of tetrabromobisphenol A, also known as TBBPA. Albemarle Corporation manufactures TBBPA under the trade name SAYTEX<sup>®</sup> CP-2000 flame retardant at our 50,000 metric ton plant in Magnolia, Arkansas. Information pertaining to Albemarle in the background document for TBBPA's nomination to the NTP is inaccurate regarding our processes and capacity. The background document "Tetrabromobisphenol A [79-94-7] Review of Toxicological Literature" states the following paragraph in Section 2.3 Commercial Availability:

“In 1999, Albemarle Corporation’s 50,000-metric ton plant produced TBBPA under the trade name SAYTEX<sup>®</sup> RB-100 flame retardant (58.5% bromine). Proprietary continuous technology, which does not yield methyl bromide during production, is used to give a product with six sigma quality. The facility also makes the company’s new SAYTEX<sup>®</sup> CP-2000 flame retardant (Albemarle Corp., 1997, 1998; Chem. Mark. Rep., 1999b). By the end of 2002, Albemarle, through its joint venture with Arab Potash, will have added an annual TBBPA capacity of 37,500 metric tons (Mg) (82.7 million lb) to its facility in Safi, Jordan (Lerner, 2001).”

The background document refers to the TBBPA product SAYTEX<sup>®</sup> RB-100 flame retardant. Albemarle Corporation discontinued production of this product in the year 2000 and replaced it with the TBBPA product SAYTEX<sup>®</sup> CP-2000 flame retardant. SAYTEX<sup>®</sup> CP-2000 flame retardant is produced using the proprietary continuous technology mentioned above and is the only product produced in the 50,000 metric ton TBBPA plant in Magnolia, Arkansas.

The background document also refers to Jordan Bromine Company (JBC), Albemarle Corporation’s joint venture with Arab Potash, and the planned SAYTEX<sup>®</sup> CP-2000 flame retardant plant that will be part of that facility. Jordan Bromine Company has previously announced that the Jordan SAYTEX<sup>®</sup> CP-2000 flame retardant plant’s capacity would “be brought on in stages timed to meet market demand” (JBC, December 17, 2001) and that “based on current market conditions, the CP-2000 flame retardant plant will be started up with an initial capacity of 12,500 MT” (JBC, May 23, 2001). The JBC SAYTEX<sup>®</sup> CP-2000 flame retardant plant has not begun production and will have an initial capacity of 12,500 metric tons when the plant is brought on-line. This discrepancy would significantly affect the calculation of the total worldwide production of TBBPA if not corrected.

Finally, we urge the NTP to diligently study the comments submitted by the IPC and the Brominated Flame Retardant Industry Panel. Albemarle Corporation chose to submit our other responses through these organizations in addition to the concerns raised in this letter. Both the IPC and BFRIP raised many significant issues regarding the background document on TBBPA that need to be addressed before any decision can be given by the NTP.

Sincerely,

Bonnie B. Chapman  
Product Manager, Printed Wiring Boards  
Albemarle Corporation