



1250 Connecticut Avenue, NW • Suite 700 • Washington, DC 20036
Phone: 202-637-9040 • Fax: 202-637-9178 • www.regnet.com/sblc

September 15, 2003

Scott A. Masten
Office of Chemical Nomination and Selection
NIEHS/NTP,
PO Box 12233, MD A3-07
Research Triangle Park, NC 27709



Dear Dr. Masten:

On July 16, the National Toxicology Program (NTP) published a Federal Register notice (68 Fed. Reg. 42068) which called for public comment on the nominations and study recommendations of the NTP Interagency Committee for Chemical Evaluation and Coordination (ICCEC) as developed at their June 10, 2003 meeting. One of the compounds covered in the notice is 4- phenylcyclohexene (4-PCH); in the case of 4PCH, the ICCEC decided that no testing was needed.

The SB Latex Council (SBLC) represents the major North American manufacturers of SB latex including: BASF Corporation; Mallard Creek Polymers, Inc.; OMNOVA Solutions Inc.; and The Dow Chemical Company. Approximately 85% of all carpets manufactured in the United States rely on SB latex to serve as the primary bonding agent that holds the face fiber and carpet backing together. SBLC has had a long-standing interest in issues involving 4-PCH as this substance is an impurity of the polymerization process of styrene and butadiene.

SBLC agrees with the recommendation of the ICCEC that no additional testing of 4-PCH is needed given the “low suspicion of hazard based on available human exposure and toxicity information.” Issues relating to 4-PCH and carpet emissions have been reviewed by the US Environmental Protection Agency (EPA) and no relationship with adverse human health effects were found following an evaluation of available exposure and toxicological information. In further support of the ICCEC’s recommendation, the NTP may want to obtain the following EPA contractor report, which provides the background on EPA’s analysis: Research Triangle Institute (RTI), “Evaluation of Exposures to Volatile Organics Offgassing from New Carpets: Final Report (February 1992) (RTI Report Number 94U-4479-001/12-F). Additionally, I have attached a study that evaluated the upper airway irritation potential of 4-PCH using ASTM methodology. That study found 4-PCH was not sufficiently irritating to cause a 50% reduction in respiratory rate (RD50) at the maximum attainable vapor concentration of 52 ppm.

Lastly, while the SBLC agrees with the conclusions of the ICCEC, we believe that much of the discussion of structurally related compounds in the NTP Support Document is inappropriate as reference is made to several substances that should not be considered relevant to assessing the toxicity of 4-PCH.

Please let me know if I can clarify any of the information presented.

Sincerely,

Robert J. Fensterheim