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EASTMAN

November 30, 2011

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Office of Pollution Prevention and Toxic Substances
U.S. Environmental Protection Agency
EPA East Building
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

8EHQ-1111-18505A

88120000048



Re: Section 8(e) Submission for Eastman Piccolastic™ A5 Hydrocarbon Resin.

Dear Sir or Madam:

The information below pertains to Eastman Chemical Company's Piccolastic™ A5 Hydrocarbon Resin (CAS No. 9003-53-6), and is being submitted in accordance with the current guidance issued by the EPA's interpretation of Section 8(e) of the Toxic Substances Control Act [15 U.S.C. § 2607(e)].

Eastman contracted with an outside laboratory to conduct a study entitled "An Oral (Gavage) Reproduction/Developmental Toxicity Screening Study of Piccolastic™ A5 Hydrocarbon Resin" (U.S. EPA OPPTS 870.3550 and OECD Guideline 421). The study information attached represents unaudited study data and the corresponding statistical analysis. A draft report has not been issued, but is expected in February 2012.

The study exposed 3 groups of 12 male and female Sprague-Dawley rats to Piccolastic™ A5 Hydrocarbon Resin by oral gavage at doses of 5, 15 and 35 mg/kg/day, in a corn oil vehicle. A fourth group of 12 male and female rats was used as a vehicle control and received 5 ml/kg of corn oil, the same final volume the treated animals received. Male rats were treated over a 14 day breeding period and then for an additional ~ 2 weeks for a total of 31 days. Females were treated for the 14 day mating period, through gestation and lactation, for a total of 38 days. The findings of significance to this submission were a slight, but statistically significant, increase in gestation length for the 35 mg/kg/day animals and a statistically significant decrease in the number of implantation sites at 15 and 35 mg/kg/day dose levels. This latter effect resulted in a decrease in the numbers of pups born and live litter size at 35 mg/kg/day (Tables S27 & S33). Eastman submits this data for the purpose of discharging any TSCA Section 8(e) responsibilities that might be created by this information.

Neither Eastman nor its marketing affiliates shall be responsible for the use of this information, or of any product, method or apparatus mentioned, and you must make your own determination of its suitability and completeness of your own use, for the protection of the environment, and for the health and safety of your employees and purchasers of your products. No warranty is made of the merchantability or fitness of any product, and nothing herein waives any of the Seller's conditions of sale.

CONTAINS NO CBI

If you have any questions regarding the information contained in this letter, please contact me at (423) 229-2471.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Gary Shrum". The signature is fluid and cursive, with the first name "Gary" being more prominent than the last name "Shrum".

Gary Shrum, Director, Product Safety and Health

Neither Eastman nor its marketing affiliates shall be responsible for the use of this information, or of any product, method or apparatus mentioned, and you must make your own determination of its suitability and completeness of your own use, for the protection of the environment, and for the health and safety of your employees and purchasers of your products. No warranty is made of the merchantability or fitness of any product; and nothing herein waives any of the Seller's conditions of sale.

**Steve Green
Eastman Chemical Company
100 North Eastman Road
Kingsport, TN 37660**

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT
OF THE RETURN ADDRESS. FOLD AT DOTTED LINE.

CERTIFIED MAIL



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