



CONTAIN NO. 07-118-04

POSNICK CENTER OF  
INNOVATIVE TECHNOLOGY  
FERRO CORPORATION

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November 2, 2007

TSCA Confidential Business Information Center (7407M)  
EPA East - Room 6428 Attn: Section 8(e)  
U. S. Environmental Protection Agency  
1200 Pennsylvania Ave. NW  
Washington, D.C. 20460-0001

Via USPS Certified Mail  
Return Receipt  
7006 2760 0004 3346 9926

**Re: Notification Under TSCA Section 8(e)**

Dear Sir or Madam:

Under the provisions of Section 8(e) of the Toxic Substances Control Act (TSCA) Ferro Corporation, Cleveland, Ohio, submits this letter to inform EPA of certain qualitative observations involving butyl benzyl phthalate (BBP) from a National Institute for Occupational Safety and Health (NIOSH) occupational exposure study of several plasticizers. NIOSH provided the American Chemistry Council a copy of its draft manuscript for comment. Ferro became aware of the NIOSH study because it is a member of the ACC Phthalate Esters Panel. The Panel is submitting comments to NIOSH regarding the draft manuscript. Neither Ferro or the Panel have made a determination that any of the NIOSH observations present a significant risk to health or the environment.

BBP is 1,2-benzenedicarboxylic acid, butyl phenylmethyl ester [CAS registry number 85-68-7] and is manufactured for commerce by Ferro Corporation in the USA and by Ferro (Belgium) S.p.r.l. Lanxess also produces BBP in Europe.

The observations derive from a NIOSH 2003-2005 biomonitoring study of over 100 workers in several industry sectors which utilize phthalate ester plasticizers in their operations or products. Metabolites of phthalate esters were used as urinary biomarkers. For BBP, the metabolite monobenzyl phthalate [CAS registry number 2528-16-7] was detected in workers even though no sector reported using BBP. The Centers for Disease Control previously reported monobenzyl phthalate in the urine of a cross-section of the U.S. population, likely due to environmental exposure. (CDC, 2005. Third National Report on Human Exposure to Environmental Chemicals.)

If you have questions about this submission, please contact me at 216-750-6696.

The contact at NIOSH regarding the occupational biomonitoring study is:

Cynthia Hines  
Robert A. Taft Laboratories  
4676 Columbia Parkway  
Cincinnati, OH 45226-1998



Sincerely,

Alan Olson, P.E.  
Director of Technology  
and Product Stewardship  
Ferro Corporation



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