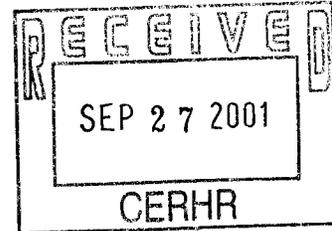

BROMINATED SOLVENTS COMMITTEE

1250 Connecticut Avenue, N.W. • Suite 700 • Washington, D.C. 20036
Phone: 202-637-9040 • FAX: 202-637-9178

September 26, 2001



Dr. Michael D. Shelby, Ph.D.
Director, NTP Center for the Evaluation
of Risks to Human Reproduction
79 T.W. Alexander Drive, Building 4401, Room 102
P.O. Box 12233 EC-32
Research Triangle Park, NC 27709

RE: 1-bromopropane (1-BP; CASRN: 106-94-5) CERHR review

Dear Dr. Shelby,

The Bromine Solvents Consortium (BSOC) would like to offer its assistance to the Center for Evaluation of Risks to Human Reproduction in the evaluation of 1-bromopropane for possible reproductive or developmental endpoints. BSOC is a consortium of three major manufacturers of 1-bromopropane - Albemarle Corporation, Great Lakes Chemical Corporation, and Dead Sea Bromine Group. BSOC was established to develop a more extensive database of toxicity and environmental information for 1-BP. Studies funded or provided by BSOC and its members have included modeling ozone depletion potential of short lived substances, repeated dose animal toxicity studies, flammability testing, and workplace exposure. BSOC has worked with the Environmental Protection Agency to provide the information it needs for assessment of 1-BP for the Significant New Alternative Program for replacement of Ozone Depleting Substances.

BSOC has conducted a series of animal toxicity studies on 1-BP, culminating in a 2 generation reproduction study in rats exposed by inhalation. The report for that study, and the preliminary developmental study have been sent to the National Toxicology Program archives, as well as to EPA and its consultants. We welcome your questions on these studies, and trust that our answers on the 90 day repeated dose study were of assistance.

Considerable information on toxicity, ozone depletion potential, and production/uses of 1-BP have been submitted to the Air Docket. BSOC is concerned that in some comments to the Air Docket, overestimated potential 1-bromopropane production volumes based on bromine production have been equated with emissions and exposures. Our estimates of bromine and 1-bromopropane production show much more limited potential than has been expressed. Our experiences with customers have shown that good industrial handling practices and proper use of degreasing and other cleaning equipment can minimize worker exposure. We will provide what

assistance we can as a group in these areas, but in some cases, must respond as individual companies on company specific areas.

We would also like to be represented at the Dec. 5-7, 2001 meeting. Dr. Nancy O'Malley, Albemarle Corporation will be plan to be in attendance. She can be reached at (225) 388-7611 if you have questions that our members can answer for you.

Sincerely,

Gary Terhaar by Nancy O'Malley

Gary TerHaar
Chairman, BSOC