

Eastman Chemical Company
P. O. Box 511
Kingsport, Tennessee 37662

EASTMAN

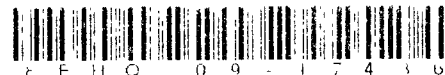
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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Document Control Center (Mail Code 7407M)
EPA East - Room 6428
Attention: TSCA Section 8(e)
Office of Pollution Prevention and Toxics
United States Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460



**Re: Section 8(e) Submission for
2,2'-ethylidenebis(4,6-di-tert-butylphenyl)fluorophosphite,
CAS NO. 118337-09-0**

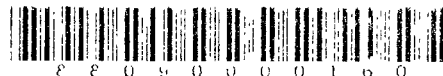
Dear Sir or Madam:

Eastman Chemical Company ("Eastman") hereby submits in the Attachment information which pertains to exposure symptoms experienced by two employees and which symptoms are alleged to be associated with manufacturing operations involving the production of 2,2'-ethylidenebis(4,6-di-tert-butylphenyl)fluorophosphite, CAS # 118337-09-0. Each employee received medical treatment for the symptoms. Available information and clinical observations indicated the symptoms to be consistent with hypersensitivity pneumonitis. The specific causative agent could not be determined. As a precaution, Eastman is submitting the information to the TSCA section 8(e) Office. The MSDS for the CASRN 118337-09-9 is enclosed along with a description of available toxicological information.

If you have any questions regarding the information provided, please contact me directly.

Sincerely yours,

Gary Shrum
Director, Product Safety and Health
Eastman Chemical Company
(423) 229-2471



Contains No CBI

CONTAINS NO CBI

317655



ATTACHMENT
2,2'-ethylidenebis(4,6-di-tert-butylphenyl)fluorophosphite
CAS NO. 118337-09-0

On February 4, 2009 Eastman Chemical Company ("Eastman") received information that two employees (employee 1 and employee 2), assigned as chemical manufacturing operators, had reported experiencing symptoms alleged to be associated with the manufacture of 2,2'-ethylidenebis(4,6-di-tert-butylphenyl)fluorophosphite, CAS # 118337-09-0. Information about symptoms experienced by each employee and alleged relationship to work involving the substance process was made known to area supervisors who forwarded information to appropriate departments responsible for workplace and employee safety and to Eastman's Product Safety and Health staff on February 4.

The substance is manufactured at Eastman's Kingsport, Tennessee facility for Eastman's sole use in chemical processes located at two other Eastman facilities. The substance process is one of more than 30 chemical manufacturing processes operated at various times in this area of the Kingsport facility. The process for this substance has been in operation since 2000. The manufacturing process for the substance consists of campaigns lasting approximately 8 weeks which are conducted twice per year. A total of 36 operators are assigned to the manufacturing area in which this process is conducted. Operators who have had responsibilities for the process were interviewed regarding their work experiences with the substance process. None of the other operators reported having experienced any symptoms. Also, there has been no report of symptoms at the two facilities that use the substance. One other known manufacturer of the substance was contacted regarding their worker experience with the substance. They indicated that they have had no report of symptoms.

The MSDS for the substance is attached. Based on available toxicological information, the substance is classified as presenting a low hazard for general industrial handling. The substance has a low order of oral and dermal toxicity, is not irritating and is not a skin sensitizer.

The most recent manufacturing campaign for the substance began December 13, 2008. Employee 1 has worked in the process area for the substance since the process was started in 2000. Employee 2 has worked in the process area since 2004. A review of the each employee's involvement with the substance during this campaign was conducted. There were several days between the day each employee began work on the substance process and the day on which the employee sought medical treatment. Employee 1 worked with the substance process on January 18, 2009. Employee 1 worked additional days after January 18, but the work involved other chemical processes in the area. On January 27, employee 1 sought medical treatment for symptoms.

Employee 2 worked with the substance process a total of 15 days during the period of December 23 through January 25. Employee 2 sought medical treatment for symptoms on January 25. For each employee, symptoms included cough, shortness of breath, aches and chills. Based on information provided by each employee and on clinical evaluations, each employee's condition was indicated to be consistent with hypersensitivity pneumonitis.

Chemical manufacturing procedures require the use of personal protective equipment, including coveralls, gloves, apron, and eye protection for all chemical operations and use of respiratory protection to reduce exposure risk to dust or chemical vapor inhalation, when appropriate. A review of the manufacturing process for the substance was initiated by company industrial hygiene staff to evaluate work practices and potential inhalation exposure for each task associated with the manufacturing process, including operations where use of respirator protection is required. Upon completion of industrial hygiene's review, changes to procedures and operator training will be implemented as needed to further ensure proper use of work practices and personal protective equipment to minimize risk of employee exposures.

It is recognized that development of hypersensitivity pneumonitis can occur in a small portion of individuals who experience repeated inhalation exposures to certain substances. While a determination was not made as to the exact cause of the symptoms experienced by the two employees, Eastman has assigned both employees to other job responsibilities outside of the substance manufacturing area.

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MATERIAL SAFETY DATA SHEET

Revision Date: 02/03/2009
MSDSUSA/ANSI/EN/150000037175/Version 5.0

1. CHEMICAL PRODUCT AND COMPANY IDENTIFICATION

Product Name	Antioxidant 398
Product Identification Number(s)	13132-00, P1313200, E1313201, P1313201, E1313202, P1313202
Manufacturer/Supplier	Eastman Chemical Company 200 South Wilcox Drive Kingsport, TN 37660-5280 US +14232292000
MSDS Prepared by	Eastman Product Safety and Health
Chemical Name	2,2'-ethylidenebis(4,6-di-t-butylphenyl)fluorophosphite
Synonym(s)	13132-00 611306
Molecular Formula	C30H44FO2P
Molecular Weight	486.65
Product Use	antioxidant
OSHA Status	nonhazardous

For emergency health, safety, and environmental information, call 1-423-229-4511 or 1-423-229-2000.

For emergency transportation information, in the United States: call CHEMTREC at 800-424-9300 or call 423-229-2000.

2. COMPOSITION INFORMATION ON INGREDIENTS

(Typical composition is given, and it may vary. A certificate of analysis can be provided, if available.)

Weight %	Component	CAS Registry No.
99.5%	2,2'-ethylidenebis(4,6-di-t-butylphenyl)fluorophosphite	118337-09-0
0.5%	impurities	not applicable

3. HAZARDS IDENTIFICATION

LOW HAZARD FOR USUAL INDUSTRIAL OR COMMERCIAL HANDLING BY TRAINED PERSONNEL

HMIS® Hazard Ratings: Health - 1, Flammability -1, Chemical Reactivity - 0

HMIS® rating involves data interpretations that may vary from company to company. They are intended only for rapid, general identification of the magnitude of the specific hazard. To deal adequately with the safe handling of this material, all the information contained in this MSDS must be considered.

4. FIRST-AID MEASURES

Inhalation: If symptomatic, move to fresh air. Get medical attention if symptoms persist.

Eyes: Any material that contacts the eye should be washed out immediately with water. If easy to do, remove contact lenses. Get medical attention if symptoms persist.

Skin: Wash with soap and water. Get medical attention if symptoms occur.

Ingestion: Seek medical advice.

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5. FIRE FIGHTING MEASURES

Extinguishing Media: water spray, carbon dioxide, dry chemical
Special Fire-Fighting Procedures: Wear self-contained breathing apparatus and protective clothing.
Hazardous Combustion Products: carbon dioxide, carbon monoxide, hydrogen fluoride, oxides of phosphorus
Unusual Fire and Explosion Hazards: Powdered material may form explosive dust-air mixtures.

6. ACCIDENTAL RELEASE MEASURES

Sweep up and place in a clearly labeled container for chemical waste.

7. HANDLING AND STORAGE

Personal Precautionary Measures: No special precautionary health measures should be needed under anticipated conditions of use.
Prevention of Fire and Explosion: Keep from contact with oxidizing materials. Minimize dust generation and accumulation. In the United States of America, refer to NFPA® Pamphlet No. 654, "Prevention of Fire and Dust Explosions in the Chemical, Dye, Pharmaceutical, and Plastics Industries."
Storage: Keep container closed.

8. EXPOSURE CONTROLS/PERSONAL PROTECTION

Country specific exposure limits have not been established or are not applicable unless listed below.

Ventilation: Good general ventilation (typically 10 air changes per hour) should be used. Ventilation rates should be matched to conditions. Supplementary local exhaust ventilation, closed systems, or respiratory and eye protection may be needed in special circumstances; such as poorly ventilated spaces, heating, evaporation of liquids from large surfaces, spraying of mists, mechanical generation of dusts, drying of solids, etc.

Respiratory Protection: If engineering controls do not maintain airborne concentrations below recommended exposure limits (where applicable) or to an acceptable level (in countries where exposure limits have not been established), an approved respirator must be worn. In the United States of America, if respirators are used, a program should be instituted to assure compliance with OSHA Standard 63 FR 1152, January 8, 1998. Respirator type: dust

Eye Protection: It is a good industrial hygiene practice to minimize eye contact.

Skin Protection: It is a good industrial hygiene practice to minimize skin contact.

Recommended Decontamination Facilities: eye bath, washing facilities

9. PHYSICAL AND CHEMICAL PROPERTIES

Physical Form: solid (powder)

Color: white

Odor: odorless

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Specific Gravity: > 1
Melting Point: 199.3 °C
Solubility in Water: hydrolyzes
Flash Point: not applicable, combustible solid
Thermal Decomposition Temperature: (DSC) No exotherm to 450°C

10. STABILITY AND REACTIVITY

Stability: Not fully evaluated. Materials containing similar structural groups are normally stable.
Incompatibility: Material reacts with strong oxidizing agents.
Hazardous Polymerization: Will not occur.

11. TOXICOLOGICAL INFORMATION

Acute toxicity data, if available, are listed below. Additional toxicity data may be available on request.

Oral LD-50:(rat)	>5,000 mg/kg
Dermal LD-50: (rabbit)	> 2,000 mg/kg

12. ECOLOGICAL INFORMATION

Acute toxicity data, if available, are listed below. Additional toxicity data may be available on request.

This material has not been tested for environmental effects.

13. DISPOSAL CONSIDERATIONS

Discharge, treatment, or disposal may be subject to national, state, or local laws. Incinerate.

14. TRANSPORT INFORMATION

Important Note: *Shipping descriptions may vary based on mode of transport, quantities, package size, and/or origin and destination. Consult your company's Hazardous Materials/Dangerous Goods expert for information specific to your situation.*

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DOT (USA)

Class not regulated

Sea - IMDG (International Maritime Dangerous Goods)

Class not regulated

Air - ICAO (International Civil Aviation Organization)

Class not regulated

15. REGULATORY INFORMATION

This product has been classified in accordance with the hazard criteria of the Controlled Products Regulations and the MSDS contains all the information required by the Controlled Products Regulations.

WHMIS (Canada) Status: noncontrolled

SARA 313: none, unless listed below

Carcinogenicity Classification (components present at 0.1% or more): none, unless listed below

TSCA (US Toxic Substances Control Act): This product is listed on the TSCA inventory. Any impurities present in this product are exempt from listing.

MITI (Japanese Handbook of Existing and New Chemical Substances): This product is listed in the Handbook or has been approved in Japan by new substance notification.

16. OTHER INFORMATION

Visit our website at www.EASTMAN.com or email emmsds@eastman.com

The information contained herein is based on current knowledge and experience; no responsibility is accepted that the information is sufficient or correct in all cases. Users should consider these data only as a supplement to other information. Users should make independent determinations of suitability and completeness of information from all sources to assure proper use and disposal of these materials, the safety and health of employees and customers, and the protection of the environment.

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Highlighted areas indicate new or changed information.

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