

Flexsys America LP 260 Springside Drive Akron, OH 44333

July 20, 2022

Dear Department of Toxic Substances Control (DTSC),

Antidegradants perform a critical role in all tire applications, providing substantial benefits to both passenger safety and environmental impact. Without high performing antidegradants, such as 6PPD, tires would be significantly more prone to premature failure, possibly leading to on-road safety incidents, and tires would have much shorter useful lifetimes, leading to higher material usage and ultimately more waste. 6PPD is an especially and uniquely effective product, protecting external tire components from ozone attack and protecting internal, safety-critical components from oxygen attack. Without effective antidegradants, producing tires with a long and safe service life is not possible.

When considering the complete range of performance and safety requirements that an effective antidegradant must satisfy, we are not presently aware of any commercial alternatives that could deliver the same application performance as 6PPD, while further minimizing impacts to human health and the environment. For a 6PPD alternative to be developed, we believe it will be necessary to allow the tire industry sufficient time to study the potential environmental impacts, as well as validate the performance in-use to avoid regrettable substitutions that may impact passenger safety.

Key steps required for proper validation and industry acceptance include:

- Conducting lab-scale performance testing
- Determining human toxicity and potential environmental impacts of both parent molecules and transformation products
- Regulatory and legislative agreement on environmental health and safety standards used to define a safer alternative (which is a gap at this time)
- Assessing real-word performance in tires, including pilot scale manufacturing and multi-year, fieldbased tire tests
- Substantial investments in construction of scale-up and full-scale manufacturing assets to supply the required quantities to industry

While Flexsys supports a process to identify 6PPD-alternatives due to the possible impact to Coho salmon, there are many speculative conclusions about broader environmental and human health impacts of 6PPD within the supporting technical report titled *Product-Chemical Profile for Motor Vehicle Tires Containing 6PPD*. These conclusions are not supported by reliable information as defined by Chapter 55: Safer Consumer Products, Section 69501.1 and we feel it is not appropriate for this information to be used in the priority listing determination. In addition, we request the DTSC clearly identify where these conclusions are based potential as defined in Section 69501.1 and where data gaps exist.

Sincerely,

Neil Smith

Chief Technology Officer, Flexsys America LP