



December 22, 2020

Meredith Williams
Director
Department of Toxic Substances Control
1001 I Street
Sacramento, CA 95814-2828

Re: Safer Consumer Products, Priority Product Work Plan

Dear Director Williams,

The U.S. Tire Manufacturers Association¹ (USTMA) ask that DTSC add N-(1,3-Dimethylbutyl)-N'-phenyl-p-phenylenediamine or 6PPD used in tires to the 2021-2023 Priority Product Work Plan for the Safer Consumer Products Regulations. 6PPD is used in tires to prevent degradation and cracking, deterrence of which is vital for passenger safety. A recent study published in *Science* on December 3, 2020 suggests a link between 6PPD-quinone, a transformation product of 6PPD, and Coho salmon mortality.² This study has raised questions about the impact of 6PPD-quinone on other aquatic species and human health.

Under the Safer Chemical Products Regulations, DTSC is required to prepare a Priority Product Work Plan (hereinafter "Work Plan") every three years that identifies and describes the specific product categories that the Department will evaluate in order to identify potential Priority Products containing a Chemical of Concern. Further, under the Safer Consumer Products Regulations, DTSC may only evaluate those product categories that are described in the Work Plan during the three-year period that the work plan is active. We understand that DTSC is close to finalizing the proposed 2021-2023 Work Plan, which will soon be released for public comment.

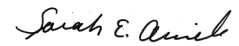
Given the recent study findings regarding 6PPD-quinone and the current opportunity to inform the development of the next three-year Work Plan for the California Safer Consumer Products Regulations, listing 6PPD in tires in the Work Plan will provide the opportunity to analyze these issues and whether alternatives exist that meet the criteria in the law.

¹ The U.S. Tire Manufacturers Association (USTMA) is the national trade association for tire manufacturers that produce tires in the U.S. Our 13 member companies operate 57 tire-related manufacturing facilities in 17 states. U.S. tire manufacturing directly supports more than 20,000 California jobs and has a direct impact of more than \$3.5 billion on the state's economy – generating \$1.1 billion in state and local tax revenue. USTMA advances a sustainable tire manufacturing industry through thought leadership and a commitment to science-based public policy advocacy. Our member company tires make mobility possible. USTMA members are committed to continuous improvement of the performance of our products, worker and consumer safety and environmental stewardship. USTMA members are: Bridgestone Americas, Inc., Continental Tire the Americas, LLC; Cooper Tire & Rubber Company; Giti Tire (USA) Ltd.; The Goodyear Tire & Rubber Company; Hankook Tire America Corp.; Kumho Tire Co., Inc.; Michelin North America, Inc.; Nokian Tyres, Pirelli Tire North America; Sumitomo Rubber Industries, Ltd.; Toyo Tire Holdings of Americas Inc. and Yokohama Tire Corporation.

² Z. Tian *et al.*, *Science* 10.1126/science.abd6951 (2020).

Thank you for your consideration of our request to add 6PPD in tires to the 2021-2023 Work Plan. If there is any additional information we can provide to support this request, please let me know.

Best regards,

A handwritten signature in cursive script that reads "Sarah E. Amick".

Sarah Amick
Vice President EH&S and Senior Counsel
U.S. Tire Manufacturers Association