



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

**MEMORANDUM FOR THE RECORD**

**SUBJECT:** Email Exchanges with Multiple Chemical Data Reporting (CDR) Rule Submitters to Discuss DINP and DIDP

In November 2023, EPA staff emailed various CDR submitters with questions related to their submissions for the 2016 and 2020 reporting periods of DIDP (CASRN 68515-49-1 and CASRN 26761-40-0) and DINP (CASRN 28553-12-0 and CASRN 68515-48-0). EPA asked questions about specific entries in the CDX system which the Agency reviewed to better understand conditions of use for DIDP and DINP. EPA explained that responses would help inform the Manufacturer Requested Risk Evaluation process. EPA staff contacted 24 CDR submitters in total and received responses to the questions from 11 CDR submitters via e-mail correspondence and did not from others. Below is a summary of the responses from CDR submitters that did reply to EPA.

***3M***

In November 2023 3M responded to EPA's inquiry regarding their reported use of DIDP (CASRN 26761-40-0) in commercial and consumer applications by providing a clarifying statement on their CDR reporting and an example of a product in use which contains DIDP. 3M confirmed import of DIDP (CASRN 26761-40-0) as part of industrial adhesive sealant products, which are ultimately used in automotive sealant bonding applications. 3M also shared a YouTube video of the application of this product. A transcript of this YouTube video is included as an attachment to this memorandum. 3M noted that the DIDP they import is used in their trademarked "adhesive sealant 760 UV" and provided a link to the current version of the Safety Data Sheet (SDS), which is included as an attachment to this memorandum. 3M also clarified that the DIDP content in this product is now made with DIDP's other CASRN (68515-49-1) because their supplier changed the mixture from a blend of CASRN 26761-40-0 and other phthalates.

***Akrochem Corporation***

In November 2023 Akrochem Corporation responded to EPA's inquiry regarding their reported use of DIDP (CASRN 26761-40-0) in commercial and consumer applications. Akrochem Corporation responded that they had no knowledge of the use of DIDP in these uses.

***BASF***

In November 2023 BASF responded to EPA's inquiry regarding their reported use of DIDP (CASRN 68515-49-1) in petroleum production and DINP (CASRN 28553-12-0) in footwear and apparel products as reported in their CDR submittals. BASF noted that DIDP is used in a service companies' formulation to make a "swellable packer" elastomer that blocks sections of the

injection tubing during petroleum production. For DINP they stated that DINP was use for screen printing inks but industry has moved to other plasticizers; however, DINP is likely still being used to manufacture plastic boots (e.g., rain and snow boots).

#### ***ChemSpec Ltd***

In April 2024 ChemSpec Ltd responded to EPA's inquiry regarding their reported use of DIDP (26761-40-0) and DINP (28553-12-0) in plastic product manufacturing and any further information about the commercial/consumer uses for DIDP (26761-40-0) as reported in their CDR submittals. ChemSpec Ltd. noted that the general use of DIDP and DINP is as a plasticizer in the formulation of thermoset plastics and thermoplastics with downstream uses in aerospace, automotive, construction (adhesive-sealants), various mats / flooring, oil and gas, wire /cable, and belting.

#### ***Evonik Corporation***

In November 2023 Evonik responded to EPA's inquiry regarding their reported use of DINP (CASRN 28553-12-0) as a processing aid. Evonik stated that DINP is primarily used as a plasticizer to make plastics more flexible in consumer and commercial applications. Evonik also noted that in less frequent cases DINP is used in non-PVC applications as a processing aid in pigments dispersion, paints, rubber, and printing inks. In the non-PVC uses DINP is part of a larger mixture with very low volatility potential due to boiling point consideration.

#### ***Industrial Chemicals, Inc.***

In November 2023 Industrial Chemicals, Inc. responded to EPA's inquiry regarding their reported use of DINP (CASRN 28553-12-0) in commercial and consumer applications. Industrial Chemicals, Inc. noted that DINP is used in flexible plastics and has replaced di-2-ethylhexyl phthalate in some plastics but not in medical products. Products that would typically contain DINP are those such as toys, flooring, gloves, drinking straws, garden hoses, and sealants used in food packaging.

#### ***Mak Chemicals, Inc.***

In November 2023 Mak Chemicals, Inc. responded to EPA's inquiry regarding their reported use of DINP (CASRN 28553-12-0) in commercial and consumer applications. Mak Chemical, Inc. responded with a link to their SDS sheet for DINP. The SDS contains a list of possible downstream uses for DINP and is included as an attachment to this memorandum.

#### ***Silver Fern Chemical, Inc.***

In November 2023 Silver Fern Chemical, Inc. responded to EPA's inquiry regarding their reported use of DINP (CASRN 28553-12-0) in their 2020 CDR submission, "not known or reasonably ascertainable" for the industrial function and sector category. Silver Fern noted that for the CDR reporting period they sold to customers who manufacture paint, manufacture coatings (specifically durable polymer coatings such as those used in the construction industry), and supply sealants and plastic machine parts as well as other industrial materials and tools. Silver Fern also noted that they sell to other customers who are industrial chemical distributors and that some of the DINP use may be associated with chemical adjuvants that are used in

dyeing; however, Silver Fern was unable to verify if the DINP was actually used in and dyeing applications.

### ***Superior Oil Company***

In November 2023 Superior Oil Company responded to EPA's inquiry regarding their reported use of DINP (CASRN 28553-12-0) in their 2020 CDR submission, "not known or reasonably ascertainable" for the industrial function and sector category. Superior Oil noted that they are a chemical distributor and sell DINP to various customers in different sectors including those with products used in coating and caulking applications, molded part manufacturing (*i.e.*, plastic pipe, ink rollers, ink pads, and ink stamps in the printing industry), and flush in resin (*i.e.*, resin intended for use in an application gun) and foam application guns in the composites industry,

### ***Troy Corporation***

In November 2023 Troy Company responded to EPA's inquiry regarding their reported use of DIDP (CASRN 68515-49-1) in their 2020 CDR submission of DIDP being used as a reactant in paint and coating manufacturing. Troy Corporation noted that they do not produce DIDP but rather buy it and blend it with pesticide active ingredients for the paints and coatings as well as the plastic industries as this blend helps with antimicrobial control during the manufacturing process.

### ***Westlake Corporation***

In November 2023 Westlake Corporation responded to EPA's inquiry regarding their reported use of DINP (CASRN 68515-48-0) in commercial and consumer applications. Westlake noted that the reporting of commercial and consumer use was an error on the CDX system and that they indicated "there are no applicable consumer or commercial uses for this chemical" when they completed their 2020 CDR reporting.

### **Attachments (3) – in separate file due to copyright restrictions**

3M Hybrid Adhesive Sealant 760, White, Gray, and Black - SDS

3M Bonding Solutions Part III: Application - YouTube Transcript

Nan Ya Plastics Corporation DINP - SDS