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Ms. Cynthia Oshita
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Via e-mail: coshita@oehha.ca.gov

July 13, 2009

A technical correction and replacement Page 3 for the OEHHA additional comment submission regarding the proposed California Proposition 65 listing of Vinyl Acetate made by Wacker Chemical Corporation on July 10th.

Dear Ms. Oshita:

Attached below is a corrected page three of the comment document we submitted last Friday. The change made is to the last bullet point under the uses of Vinyl Acetate copolymers.

These (co)polymers are not "monomers" used in the production of other copolymers as we stated in our original document. Instead they are themselves (co)polymers which can be used as raw materials to be incorporated, treated, modified or further reacted to create additional types of (co)polymers.

Best Regards,

A handwritten signature in black ink, appearing to read "Michael C. Strong".

Michael C. Strong

They are used as:

- additives e.g. for
 - coatings
 - fuel
- binders e.g. for
 - (low VOC waterborne) adhesives / glues
 - coatings for food packaging
 - concrete
 - exterior thermal insulation composite systems
 - filler
 - (repair) mortars and grouts
 - non-woven fabric and paper items, such as wipes and filter papers
 - personal care products such as hair sprays, feminine hygiene
 - (low VOC) emulsion / water based paints
 - paper finishing
 - plasters
 - renders
 - sealing slurries
 - self leveling mortars and screeds
 - textile finishing agents
 - tile adhesives
- fibers
- films
- masticatory polymers e.g. for chewing gum (base)
- as a modifier for plastics e.g. low profile additive
- as a raw material used in the production of other (co)polymers, e.g. polyvinyl alcohol, polyvinyl butyral

When evaluating vinyl acetate monomer, one has to consider the consecutive downstream steps of the value chain:

- Production:
Synthesis of the monomer vinyl acetate.
- Use:
Processing = (co)polymerization of vinyl acetate monomer to polyvinyl acetate and vinyl acetate copolymers
- Compounding:
Handling of the (co)polymers in the different delivery forms:
 - Manufacturing of ready-to-use products such as adhesives, paints, textile finishing agents, chewing gums.
 - Manufacturing of intermediates such as fibers, films, lacquers, printing inks.
- End Use:
Use of compounded products:
 - Commercial end user examples are painting, floor laying, gluing furniture together, tile adhesives.
 - Industrial end user examples include printing, manufacturing of finished / coated films.
- Consumer:
Potential exposure to products made from or containing vinyl acetate polymers and