

## Summary of Public Comments Received on the Government of Canada's Proposed Risk Management Approach Document on 2,4,6-tri-tert-butylphenol (CAS No. 732-26-3)

Comments on the Proposed Risk Management Approach document for **2,4,6-tri-tert-butylphenol** as part of the Chemicals Management Plan Challenge were provided by one company.

A summary of comments and responses is included below, organized by topic:

- [Risk management](#)

| TOPIC                  | COMMENT                                                                                                                                      | RESPONSE                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|------------------------|----------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Risk management</b> | As a component of fuel, 2,4,6-tri-tert-butylphenol could be subject to the risk management outcomes of the Petroleum Sector Stream Approach. | Fuels, including those that can contain 2,4,6-tri-tert-butylphenol, are being assessed as part of the Petroleum Sector Stream Approach under the Chemicals Management Plan. Risk management actions that may be implemented under this Approach for fuels might also contribute to the risk management of 2,4,6-tri-tert-butylphenol.                                                                                                                                                                                                                                                                                                                                                                       |
|                        | 2,4,6-tri-tert-butylphenol should be added to the <i>Environmental Emergencies Regulations</i> .                                             | The Government of Canada is not considering adding 2,4,6-tri-tert-butylphenol to the <i>Environmental Emergencies Regulations</i> . Antioxidant additives containing 2,4,6-tri-tert-butylphenol are typically injected under pressure at the refinery into the pipeline carrying the fuel from the production unit to the storage tank, and releases are not expected. In addition, the concentration of 2,4,6-TTBP in these additives does not exceed 15% in volume, and information available indicates that quantities stored at refineries would be below the quantity threshold of 220 kg that would be specified under the <i>Environmental Emergencies Regulations</i> for this substance if listed. |