



CALUMET PENRECO, LLC

2780 Waterfront Pkwy. E. Dr. Suite 200 Indianapolis, IN 46214
Phone: 317-328-5660 Fax: 317-328-5661 Sales: 1-800-437-3188 www.calumetspecialty.com

January 3, 2008

Dear Calumet Penreco Customer,

The European Dangerous Substance Directive, 67/548/EEC and its various amendments, includes a "Consolidated List of C/M/R Substances, classified as category 1 or 2 carcinogens, mutagens or toxic to reproduction". Category 2 (Carcinogens) lists 550 products. Most are petroleum or coal derived materials. One of the materials on the list is petrolatum with CAS number 8009-03-8. It is also the name and CAS number that is used with the INCI (International Cosmetic Ingredient) inventory for cosmetic products. The CAS definition for 8009-03-8 does not describe a purity specification. Therefore this number is used for both refined and unrefined petrolatums.

Calumet Penreco LLC USP grade Petrolatums are not carcinogenic, mutagenic, or toxic to reproduction. They meet the purity requirements in FDA regulation 21CFR 172.880 that includes an analytical procedure that is specifically intended to indicate the level of total polycyclic aromatic hydrocarbons. Our experience tells us that petrolatum meeting this test will also pass the European Pharmacopoeia (EP) test for polycyclic aromatic hydrocarbons. Petrolatums meeting the FDA test can be used in certain food applications. The technical literature for petrolatum was reviewed with mineral oils in IARC (International Agency for Research on Cancer) Volume 33, 1984. That report, and a supplement in 1987, concluded that there was inadequate evidence of carcinogenicity in humans and animals for highly refined oils (and petrolatums included in class 5 petroleum products). Calumet Penreco LLC USP Petrolatums are severely hydrotreated during manufacture. They do not fall into the "mildly" hydrotreated definition that OSHA (Occupational Safety and Health Administration) used in 1985 (FR 50, No.245) to describe petroleum oils that had the potential to cause cancer.

The C/M/R List of the Dangerous Substances Directive has a notation "N" next to the petrolatum entry that says "The classification as a carcinogen need not apply if the full refining history is known and it can be shown that the substance from which it is produced is not a carcinogen." Colipa (The European Cosmetic, Toiletry, and Perfumery Association) and EWF (The European Wax Federation) recently recommended that refined petrolatum include the following statement on their certificates of analysis:

It is hereby guaranteed that the product is produced from substances that are not carcinogens according to the (EU's)* Dangerous Substances Directive and of which the full refining history is known.

Calumet Penreco, LLC is a wholly owned subsidiary of Calumet Specialty Products Partners, L.P.

Hvdrocal® Calsol® Calbro® Caloar® Orchex® Versaael® Svnerael® Drakesol® Conosol® MaacieSol® Drakeol® Parol® Inkol®



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As we stated above Calumet Penreco USP grade Petrolatums are not carcinogenic, mutagenic or toxic for reproduction. We include the statement above on all of our certificates of analysis for our USP grade petrolatums. This letter applies to the following Calumet Penreco products:

- Ultima
- Super
- Snow
- Snow
- Regent
- Lily
- Cream
- Royal
- Blond
- Amber
- Ointment Base No. 4
- Ointment Base No. 6
- Ointment Base No. 8

I hope this information is helpful. Please let me know if we can help with anything else.

Sincerely,

A handwritten signature in black ink that reads "Harold R. Faust".

Harold R. Faust
Technical Services
Calumet Specialty Products Partners, L.P.

* (EU's) added by Penreco

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