



WILFRED A. CÔTÉ
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December 1, 2008

xpedx
4140 East Paris Ave
Kentwood, MI 49512

Attn: Ms. Virginia Rollins, Book Publishing Manager

Re: Consumer Product Safety Improvement Act [HR4040] Status of Offset Papers
(Williamsburg Offset, Grade Code: 7895, Franklin, Virginia Mill)

Dear Ms. Rollins:

Please be advised that International Paper's commercial printing papers as described above are made without the use of phthalates [including di(2-ethylhexyl) phthalate (DEHP), butyl benzyl phthalate (BBP), di-n-butyl phthalate (DBP), diisononyl phthalate (DINP), diisodecyl phthalate (DIDP), di-n-octyl phthalate (DNOP)] and without added heavy metals such as lead. Any detectable phthalates are trace contaminants from plastic chemical storage or transport systems or are artifacts of the chemical analysis. In no instance will the presence of any phthalate approach or exceed the limitation of 0.1 parts per million as established by the CPSIA. Heavy metals such as lead occur naturally in wood at very low levels because trees absorb these metals from the soil. Lead will be present at less than 3 parts per million; this level is also substantially below CPSIA lead limits for products for children. We do not intentionally add lead to our process or products. On this basis, our offset papers, all grades and trade names, comply with the requirements of the CPSIA for phthalates and lead.

International Paper does test for heavy metals and, in specific situations, for phthalates. Testing is often a mix of internal analyses and third party testing. Testing generally occurs on a 3-5 year schedule but is undertaken whenever significant process or product changes occur at a manufacturing location that could affect the status of a product. Testing is anticipated during 2009 and results of that testing or other process/product change testing could be made available at that time.

Very Truly Yours,

A handwritten signature in black ink, appearing to read "Wilfred A. Côté".

Wilfred A. Côté

c: Steven LeFevre

INTERNATIONAL  PAPER

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Attn: Ms. Virginia Rollins, Book Publishing Manager

Re: MSDS Certification for Offset Paper
(Williamsburg Offset, Grade Code: 7895, Franklin, Virginia Mill)

Dear Ms. Rollins:

You requested a Material Safety Data Sheet (MSDS) for the paper product listed above. The OSHA Hazard Communication Standard, 29 CFR 1910.1200, is intended to ensure that the hazards of all "hazardous chemicals" be identified and that this information, along with information on protective measures, be passed along to users in the manufacturing sector and their employees.

OSHA realized that requests would be made for MSDSs on materials not readily classified as "hazardous chemicals." The product you inquired about is considered to be an article by OSHA's definition in paragraph (c) of the hazard communication standard:

Article means a manufactured item other than a fluid or particle:

- i. which is formed to a specific shape or design during manufacture;
- ii. which has end-use function(s) dependent in whole or in part upon its shape or design during end use;
- iii. which under normal conditions of use does not release more than very small quantities, e.g., minute or trace amounts of a hazardous chemical (as determined under paragraph (d) of this section [of the hazard communication standard]) and does not pose a physical hazard or health risk to employees.

The papers made by International Paper will not release hazardous chemicals under normal conditions of use and falls under this article exemption. Therefore, no MSDS is required.

Very truly yours,



Wilfred A. Côté

c: Steven LeFevre