MAR 24 2003

American Coke and Coal Chemicals Institute
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March 24, 2003

Via Electronic Mail

Dr. C.W. Jameson
National Toxicology Program
Report on Carcinogens
MD EC-14
P.O. Box 12233
Research Triangle Park, NC 27709

Re: ACCCI's Comments on "National Toxicology Program; Call for Public Comments on 10 Nominations, Proposed for Listing in the *Report on Carcinogens*, Eleventh Edition" (68 Fed. Reg. 3003 (January 22, 2003))

Dear Dr. Jameson:

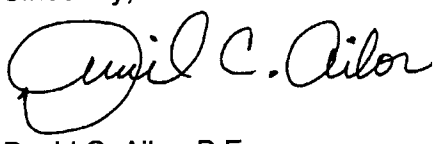
On January 22, 2003, the National Toxicology Program published the above referenced notice in the Federal Register, soliciting comments on 10 nominations for listing in the 11th *Report on Carcinogens* (*RoC*). The American Coke and Coal Chemicals Institute (ACCCI) submits these comments to NTP in response to that notice.

ACCCI is a nonprofit trade association that represents independently owned and operated "merchant" companies that produce metallurgical coke (both furnace and foundry coke); integrated steel companies that produce metallurgical coke; producers and processors of chemicals derived from the distillation of coal and coal tar; coke sales agents; and, suppliers to these producers and processors. Several companies in our membership — those that produce and process chemicals derived from the distillation of coal and coal tar — manufacture/process naphthalene or naphthalene-containing streams. Because we and they may be affected by any action NTP might take, ACCCI and its member companies have a vital and continuing interest in NTP's actions on this matter.

ACCCI strongly supports the comments submitted by the Naphthalene Panel of the American Chemistry Council, regarding the nomination of naphthalene for listing in the *11th RoC*.. In particular, we urge NTP to suspend all further action on naphthalene until the Background Document has been revised to reflect fully and accurately all available information and comments submitted on the recommendation to list naphthalene. We also strongly concur with the Panel's statement that naphthalene does not meet the criteria to be listed as *Reasonably Anticipated to be a Human Carcinogen*. There is no credible evidence from studies in humans that naphthalene is a human carcinogen.

ACCCI appreciates the opportunity to provide comments on the nomination. Please contact me if you have any questions.

Sincerely,



David C. Ailor, P.E.
Director of Regulatory Affairs