American Coke and Coal Chemicals Institute

1255 Twenty-Third Street, NW • Washington, DC 20037-1174 • (202) 452-1140 • Fax: (202) 833-3636

September 24, 2001

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Dr. C.W. Jameson
National Toxicology Program
Report on Carcinogens
79 Alexander Drive
Building 4401, Room 3118
P.O. Box 12233
Research Triangle Park, NC 27709

Re.: ACCCI Comments on NTP Call for Public Comments on 16 Substances, Mixtures and Exposure Circumstances Proposed for Listing in the Report on Carcinogens, Eleventh Edition; 66 Fed. Reg. 38430 (July 24, 2001)

Dear Dr. Jameson:

The American Coke and Coal Chemicals Institute (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. ACCCI submits this letter in response to a July 24 "call for public comments" by National Toxicology Program (NTP) on an NTP proposal to list a number of substances in the Eleventh Edition of the *Report on Carcinogens* (*RoC*). That notice lists naphthalene as one of the substances for which NTP is considering listing.

ACCCI urges NTP not to list naphthalene as a carcinogen in the *RoC*. Naphthalene does not meet the criteria for listing in the *RoC*, for all of the reasons stated in the comments separately submitted by the Naphthalene Panel of the American Chemistry Council (Panel). As discussed more fully in the Panel's comments:

- The NTP mouse bioassay upon which NTP bases the proposed *RoC* listing provides insufficient evidence of carcinogenicity in the test animals for consideration under NTP's criteria, and any tumorigenic effect, if present in that study, would not be relevant to humans. Accordingly, the study does not show, as required by NTP's *RoC* listing criteria, that there is any increased incidence of malignant or a combination of malignant and benign tumors in "multiple species."

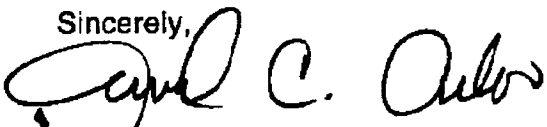
- The NTP rat bioassay, upon which the proposed *RoC* listing also is based, does not meet the standard for listing in the *RoC* because it does not indicate an increased incidence of malignant or a combination of malignant and benign tumors at multiple tissue sites, does not indicate an increased incidence of tumors to an unusual degree, and the observed increase in tumors represents a response that likely is not relevant to humans.

- The weight-of-the-evidence indicates that naphthalene is not genotoxic, and there is no other corroborative evidence that would support a listing in the *RoC*.

For all of these reasons, NTP should not list naphthalene in the *RoC*. Moreover, ACCCI agrees with the Panel that if NTP nevertheless concludes that naphthalene warrants further consideration for listing, NTP should defer any such further consideration by the RG2 Committee until after the International Agency for Research on Cancer issues a monograph following its upcoming review of naphthalene.

ACCCI appreciates NTP's consideration of these comments. Please contact me if you have any questions.

Sincerely,



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