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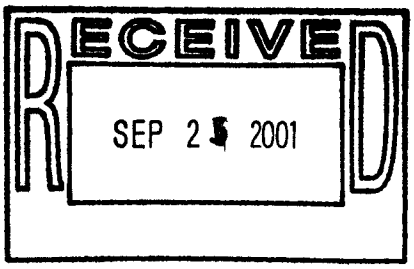
September 24, 2001
VIA E-MAIL AND FEDEX



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: National Toxicology Program; Call for Public Comment
[66 Fed. Reg. 38430 (July 24, 2001)]

Dear Dr. Jameson:

Reilly Industries, Inc., respectfully submits this letter in response to the National Toxicology Program's (NTP) call for comments on the 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 NTP is considering listing in the *RoC*. Naphthalene is present in some streams that Reilly processes as part of its coal tar refining operations.

Reilly Industries urges NTP not to list naphthalene as a carcinogen in the *RoC*. Reilly has reviewed the data summaries and discussion developed by the Naphthalene Panel of the American Chemistry Council (Naphthalene Panel), which we understand NTP will be receiving under separate cover. Reilly agrees with the Naphthalene Panel's conclusion that naphthalene does not meet the criteria for listing in the *RoC*. As discussed more fully in the Naphthalene 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. Furthermore, the study 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, Reilly agrees with the Panel that if NTP 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.

Reilly appreciates NTP's consideration of its comments. Please contact me at mbogle@reillyind.com or by phone at (317)248-6548 if you have any questions.

Sincerely,

Reilly Industries, Inc.

Misty L. Bogle

Misty L. Bogle
Senior Project Manager,
Regulatory Management

MLB/mlb

cc: J. Craun, Reilly Industries
T. Kress, Reilly Industries
A. LeHuray, American Chemistry Council