ETAD

Ecological and Toxicological Association of Dyes and Organic Pigments Manufacturers

U.S. DYE MANUFACTURERS OPERATING COMMITTEE OF ETAD

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Dr. C. W. Jameson
National Toxicology Program
Report on Carcinogens
79 Alexander Drive
Building 4401, Room 3127
MD: EC-14
P. O. Box 12233
Research Triangle Park, NC 27709

RE: Comments on Proposed Listings in Tenth Report on Carcinogens

Dear Dr. Jameson:

The U. S. Dye Manufacturers Operating Committee of the Ecological and Toxicological Association of Dyes and Organic Pigment Manufacturers (USOC/ETAD) wishes to submit these comments on the substances to be reviewed in 1999 for listing in the tenth edition of the Report on Carcinogens (FR 64, 15983, April 2, 1999; FR 64, 19188, April 19, 1999). The substances nominated by NTP to be reviewed for listing in the tenth report that are of particular concern to USOC/ETAD, as shown in the April 2, 1999 Federal Register notice, are "Dyes Metabolized to Dimethoxybenzidine (Dimethoxybenzidine Dyes as a Class)" and "Dyes Metabolized to Dimethoxybenzidine (Dimethoxybenzidine Dyes as a Class)."

First, USOC/ETAD assumes that it is not the intention of the NTP to review Dimethoxybenzidine dyes twice, but rather to review Dimethoxybenzidine dyes as a class and Di<u>methyl</u>benzidine dyes as a class. Furthermore, to be precise, the positions of the methoxy and methyl substituents on the benzidine ring system should be specified. For the Dimethoxybenzidine dyes, the positions on the ring should be specified as 3,3'-Dimethoxybenzidine (i.e., *o*-dianisidine) and for the Dimethylbenzidine dyes, the positions should be specified as 3,3'-Dimethylbenzidine (i.e., *o*-tolidine).

It is our understanding from discussions with NTP program staff that the NTP proposes to limit the review of these two classes of dyes to only dyes that are defined as dyes that could be metabolized to either 3,3'-Dimethoxybenzidine (CAS # 119-90-4) or 3,3'-Dimethylbenzidine (CAS # 119-93-7). USOC/ETAD concurs with this definition and agrees with NTP that copperized Dimethoxybenzidine dyes, such as C.I. Direct Blue 218 (CAS # 28407-37-6), should be excluded from the scope of review because they can not be metabolized to the free amine.

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In conclusion, USOC/ETAD asks that NTP correct its list of substances nominated to be reviewed for listing in the tenth edition of the Report on Carcinogens to read as follows:

"Dyes Metabolized to 3,3'-Dimethoxybenzidine (CAS # 119-90-4) (3,3'-Dimethoxybenzidine Dyes as a Class)" and

"Dyes Metabolized to 3,3'-Dimethylbenzidine (CAS # 119-93-7) (3,3'-Dimethylbenzidine Dyes as a Class)."

USOC/ETAD is the U.S. operation of the international technical organization, ETAD. ETAD is an organization of dye and organic pigment manufacturers that addresses the health, safety, and environmental issues impacting the worldwide colorants manufacturing industry. With headquarters in Basel, Switzerland, ETAD's membership presently consists of 41 companies representing the leading colorant manufacturers in the U.S., Europe, Brazil, and Asia. Members of USOC/ETAD are BASF, Bayer, Carey Industries, Ciba, Clariant, Crompton & Knowles, DyStar, Everlight, Fabricolor, and Sunbelt who, collectively, account for the vast majority of the domestic dye producing capacity.

Thank you for this opportunity to comment on the substances being considered for listing in NTP's tenth edition of the Report on Carcinogens. Please direct any questions or requests for further information to the undersigned at 202-721-4154.

Sincerely,

C. Tucker Helmes, Ph.D.
Executive Director

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