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November 30, 2000

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

Dear Dr. Jameson:

On behalf of the Metal Finishing Suppliers' Association (MFSA), the National Association of Metal Finishers (NAMF), and the American Electroplaters and Surface Finishers Society (AESF), we hereby submit these comments in support of the November 29, 2000 comments submitted to you by the Nickel Producers Environmental Research Association (NiPERA) and the Nickel Development Institute (NiDI) on the Draft RoC Background Documents for Metallic Nickel and Certain Nickel Alloys, which are being considered for possible listing as *reasonably anticipated human carcinogens* in the 10th Report on Carcinogens (RoC). MFSA members include the chemical suppliers to the metal finishing industry, NAMF members include companies that are engaged in metal finishing operations, and AESF members include the technical and educational professionals of the metal finishing industry. These associations collectively represent approximately 3,000 facilities nationwide. Nickel plating processes, utilizing soluble nickel compounds, comprise the largest segment of the U.S. metal finishing industry.

The NiPERA and NiDI comments include a summary of the most relevant data sets for metallic nickel and certain nickel alloys. The MFSA, NAMF and AESF believe that the data—when considered in a weight-of-the-evidence evaluation—show that metallic nickel and certain nickel alloys should not be identified as *reasonably anticipated human carcinogens*.

On behalf of the MFSA, NAMF and AESF, we appreciate the opportunity to submit these comments. If you have any questions about these comments, the MFSA, NAMF or AESF, or the use of nickel in the metal finishing industry, please contact Christian Richter or Jeff Hannapel at (202) 965-5190.

Sincerely,

Jeffery S. Hannapel
Vice President, Regulatory Affairs
Surface Finishing Government Relations