December 1, 2000

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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 21, 2000 comments submitted to you and the members of the NTP Board of Scientific Counselors RoC Subcommittee by the Nickel Producers Environmental Research Association (NiPERA) on the possible listing of soluble nickel compounds 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.

We would like to underscore the fact that after NTP had concluded its deliberations on soluble nickel compounds for the 9th RoC, a new comprehensive evaluation of the potential carcinogenicity of soluble nickel compounds was completed in March 1999 by a group of experts assembled by Toxicology Excellence for Risk Assessment (TERA) under the joint sponsorship of U.S. EPA, Health Canada, and the Metal Finishing Association of Southern California. This evaluation was subjected to an extensive peer-review process. Following the peer review deliberations, TERA concluded that the carcinogenicity of soluble nickel compounds via inhalation and oral exposure cannot be determined. Members of the NTP Board of Scientific Counselors RoC Subcommittee should consider the compelling findings of the TERA Review before any decisions are made about listing Soluble Nickel Compounds in the 10th RoC.

The MFSA, NAMF and AESF believe that the data—when considered in a weight-of-the-evidence evaluation—show that soluble nickel compounds should not be identified either as "*known*" or 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 soluble nickel compounds 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