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NON-CONFIDENTIAL INFORMATION
February 27, 2012

Dr. Ruth Lunn
Director, Office of the Report of Carcinogens
DNTP, NIEHS
Room 2138, 530 Davis Drive,
Morrisville, NC 27560.

RE: Public Comments on Nominations, National Toxicology Program Report on Carcinogens: Diesel Emission Particles

Dear Dr. Lunn:

On behalf of the American Petroleum Institute (API), these comments are submitted in response to the recent DNTP request (Federal Register January 19, 2012, page 2728-2729) for public comments on substances nominated for possible review for future editions of the Report on Carcinogens (RoC). These comments are focused on diesel exhaust particles, one of the substances identified in the above mentioned notice.

API is a national trade association representing more than 470 member companies involved in all aspects of the oil and gas industry, including exploration, production, refining, transportation, distribution, and marketing of petroleum and petroleum products. API member companies produce EPA-required ultra-low sulfur diesel fuel for all forms of transportation (on-road trucks, locomotives, etc.) and industrial activities (i.e., farming, construction, etc.). The use of ultra-low sulfur diesel fuel immediately reduces exhaust particulate emissions from existing diesel engines and helps enable a new generation of diesel engine technology to meet strict new EPA emission requirements.

Currently, the Health Effects Institute (HEI) is in the midst of the most comprehensive emissions and health effects study yet undertaken of the newest generation of diesel technology. This program – the Advanced Collaborative Emissions Study (ACES) – focuses on emissions from modern diesel engines now in the market. Details about the ACES study are contained in the February 24, 2012 letter from Dan Greenbaum to Ruth Lunn (copy attached). The ACES study will present comprehensive carcinogenicity results in rats after 24-30 months of inhalation exposure (18 hours per day). The exposures will be completed during mid- to late-2012 and the results will be available in mid- to late-2013.

New diesel engine technology has significantly different emissions – in terms of mass, number and size of PM and their chemical composition – than older diesel engine exhaust. We urge DNTP to delay their review of diesel exhaust particles until after completion and publication of the ACES study results. At a minimum, DNTP should separate the evaluation of new exhaust from older diesel engine exhaust.

If you have any questions or require further information regarding this submission please don't hesitate to contact me.

Sincerely,

[Redacted]

Howard J. Feldman

Enclosure: Greenbaum to Lunn, February 24, 2012