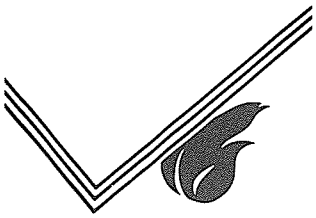

GYPSUM ASSOCIATION

May 10, 2006

Dr. Scott A. Masten
Director, Office of Chemical Nomination and Selection
NIEHS/NTP
111 T. W. Alexander Drive
PO Box 12233
Research Triangle Park, North Carolina 27709

The Gypsum Association appreciates the opportunity to comment on the nomination of gypsum as a study subject by the National Toxicology Program (NTP) as outlined in Volume 71, Number 69 of the Federal Register, notice dated April 11, 2006. [FR Doc. E6-5217]

The Gypsum Association is based in Washington, D.C. and represents United States and Canadian manufacturers of gypsum board. Our constituent membership operates nearly 100 plants, mines, and quarries in 30 states and eight provinces. Virtually all of the gypsum board shipped in the U.S. and Canada is manufactured by Gypsum Association member companies.

Our comments are specific to the item labeled as "Gypsum, natural and synthetic forms [13397-24-5]" as nominated for study by Mount Sinai-Irving J. Selikoff Center for Occupational and Environmental Medicine and the Operative Plasterers' and Cement Masons' International Association of the United States and Canada.

It is our opinion that the Supporting Nomination document [January 2006] contains no evidence that would support the identification of gypsum as a public health hazard; nor does it identify any areas where toxilogical data gaps exist. Lacking either of these elements, we do not see where the evidence would support the need for any further study action by the NTP regarding gypsum.

Numerous studies support the well-known solubility of gypsum in biological fluids. These studies include those noted in the Supporting Nomination document as well as testing performed by the research arm of United States Gypsum (USG) in 1987. In that study, in vitro anhydrous or hemihydrate Franklin Fibers in flowing Ringer's solution were found to be virtually non-existent in 168 hours. These results are consistent with a 1975 intratracheal study co-sponsored by USG which showed that no gypsum fibers were present in rat lung tissue samples within 48 hours.

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The studies cited in the Supporting Nomination document also acknowledge the near-zero potential that exposure to gypsum fibers will result in subchronic or long-term chronic disease. Gypsum fibers have an extraordinarily short-half life in rat lungs and are not classified as a carcinogen by the German TRGS 905 Classification standard. In 1994, Pott injected 10 billion fibers into the abdominal cavities of rats and was unable to induce tumors. He concluded that gypsum fiber was probably not carcinogenic – the only fiber that he has ever placed into that category.

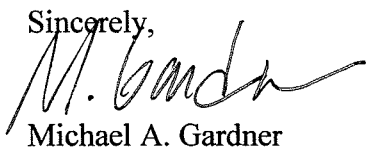
Significant long-term (20-year) medical monitoring of manufacturing employees, which includes PA lung X-rays with pulmonary function testing, by a major U.S. gypsum wallboard manufacturer has produced no evidence of any lung or pulmonary function impact from gypsum exposure. During the same time period, industrial hygiene monitoring of plants and jobsites has never indicated a health risk from gypsum.

We also would question the validity of claims about exposure to gypsum dust made by mainstream (those not employed in the construction trades or in manufacturing or mining of gypsum) individuals in their "workplace or home". Gypsum is a benign mineral and, in the United States, is primarily used to manufacture gypsum wallboard. Once manufactured and installed, the gypsum in the core of the wallboard is rarely, if ever, exposed to a building occupant. Unless a contractor or building occupant is intentionally cutting or otherwise intentionally exposing the core of the wallboard, no gypsum dust is created in a workplace or residence and exposure to the gypsum contained in the core is non-existent.

Furthermore, post-collapse air sample readings taken at the World Trade Center site and in adjacent areas, do not appear to support the need for a NTP study. The information contained in the Supporting Nomination document clearly states that "at the WTC disaster site…most exposures…did not exceed the NIOSH recommended exposure limits (RELs) or OSHA permissible exposure limits (PELs)." The same appears to be the case for samples taken at other locations in New York City.

The Gypsum Association is proud of the outstanding health and safety history that its constituent member companies have maintained since the inception of the organization in 1930. Please contact me should you wish to discuss this issue further.

Sincerely,



Michael A. Gardner
Executive Director