



ENVIRONMENTAL SERVICES North America

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August 20, 1997

Dr. C.W. Jameson
National Toxicology Program
Report on Carcinogens, MD WC-05
P.O. Box 12233
Research Triangle Park, NC 27709

Dear Dr. Jameson:

Rhone-Poulenc Environmental Services North America is responding to the Call for Public Comments issued in the Federal Register Notice of July 11, 1997, specifically regarding Sulfuric Acid Mist which has been nominated for consideration of listing in the Report on Carcinogens, Ninth Edition.

As a member of the Chemical Manufacturers Association-Inorganic Acid Mists (CMA-IAM) Panel, we support the opinion of the Panel and the scientific experts that it has consulted, that the scientific information available on Sulfuric Acid Mist is inadequate to conclude that Sulfuric Acid Mist is either a known human carcinogen or that it can be reasonably anticipated to be a human carcinogen.

The CMA-IAM Panel suspects that the nomination of Sulfuric Acid Mist is based on the listing by the International Agency for Research on Cancer (IARC) of "occupational exposure to strong inorganic acid mist containing sulfuric acid" as a known human carcinogen and/or the listing of the American Conference of Governmental Industrial Hygienists (ACGIH) of "sulfuric acid contained in strong inorganic acid mists" as a suspect human carcinogen. The Panel believes the review by IARC was inappropriate considering the data available at that time, and Rhone-Poulenc shares this view.

We therefore urge you to carefully consider the comments of the CMA-IAM Panel and conclude that the evidence does not support listing Sulfuric Acid Mist as either a known or reasonably anticipated human carcinogen.

Sincerely,

A handwritten signature in black ink, appearing to read 'MS Galuskin'.

Myron S. Galuskin
Vice President and General Manager