United Union of Roofers, Waterproofers and Allied Workers

AFFILIATED WITH AFL-CIO AND BUILDING AND CONSTRUCTION TRADES DEPARTMENT

Office of the International President

JOHN C. MARTINI

JUL 16 2004

July 8, 2004

C.W. Jameson, Ph.D.
National Toxicology Program,
Report on Carcinogens
79 Alexander Drive
Building 4401, Room 3118
P.O. Box 12233
Research Triangle Park, NC 27709

Re: Comments on the Nomination of Asphalt Fumes for Listing in the NTP Report on Carcinogens, 69 Fed. Reg. 28941 (May 19, 2004)

Dear Dr. Jameson:

Our Union and the 28,000 Roofers and Waterproofers it represents, welcome the opportunity to submit comments on the nomination of asphalt fumes for listing in the National Toxicology Program's Report on Carcinogens, 12th Edition.

The United Union of Roofers, Waterproofers and Allied Workers is comprised of workers who engage in the application of hot built-up asphalt roofs as well as below grade waterproofing in the commercial/industrial sector. We have always had a vested interest in protecting our members against all safety and health hazards at the work site. Like our partners in the Asphalt Roofing Environmental Committee (AREC), our priority is to protect the workers and the public from known safety and health hazards.

Our concern is that the nomination of asphalt fumes for listing in the NTP Report on Carcinogens may be premature, given the scientific studies that are ongoing to produce epidemiological and toxicological data on the potential carcinogenicity of asphalt fumes.

Along with the members of AREC, the United Union is anxiously awaiting the results of the IARC Case-Control Study of Asphalt Workers, and The Fraunhofer Institute's Inhalation Study in Rats to determine just what the potential is for asphalt fumes as a carcinogen for humans. Once sound scientific evidence is in hand, we can take any necessary steps to protect our workers and the public.

In light of these ongoing studies, we respectfully request that the NTP defer any formal review of asphalt fumes for listing in the Report on Carcinogens until the studies are completed and the data are available to be evaluated.

Sincerely yours,

John C. Martini

John C. Martini
International President

JCM/jr

cc: R. Snyder, ARMA

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