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June 11, 2004

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

Dear Dr. Jameson:

I am writing concerning the May 19, 2004 Federal Register notice on *National Toxicology Program: Call for Public Comments on 21 Substances, Mixtures and Exposure Circumstances Proposed for Listing in the Report on Carcinogens, Twelfth Edition.*

I note that atrazine is included as one of the chemicals listed. It raises concern that the Department of Health and Human Services is including atrazine in this listing when EPA's Scientific Advisory Panel stated in the Atrazine Interim Reregistration Eligibility Document (IRED) that "In accordance with the 1999 Interim Guidelines for Carcinogen Risk Assessment, EPA's Cancer Assessment Review Committee (CARC) classified atrazine as "not likely to be carcinogenic to humans". As further summarized in the IRED, the FIFRA SAP stated, "there are considerable differences between hypothalamic-pituitary-ovarian function in rats and humans, and the effects of aging on the function of the axis also is quite dissimilar. Therefore, it is unlikely that the mechanisms by which atrazine induces mammary gland tumors in female SD rats could be operational in humans. Nevertheless, it is not unreasonable to expect that atrazine might cause adverse effects on hypothalamic-pituitary function in humans" (SAP, 200). "Although the cancer mode of action may not be operative in humans, the SAP went further to state that the same endocrine perturbations that induce tumors also appear to play a role in at least some reproductive developmental effects (not associated with reproductive aging) which may be relevant to humans. The Agency also concluded that the cancer mode of action is not relevant to humans. Consequently, a quantitative cancer risk assessment was not conducted for atrazine." The IRED further stated that the perceived incidence of prostate cancer in the Syngenta St. Gabriel plant where atrazine is manufactured is likely due to intensive prostate specific antigen (PSA) screening of employees conducted as part of the company's "Wellness Program".

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We suggest that HHS' National Toxicology Program review the work of EPA's employees that produced the Atrazine IRED.

Sincerely,

Jim T Criswell
Pesticide Coordinator

JTC