Asphalt Roofing Manufacturers Association
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July 14, 2004

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Via E-Mail and First-Class Mail

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
e-mail: *jameson@niehs.nih.gov*

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:

The Asphalt Roofing Environmental Council (AREC) welcomes the opportunity to submit comments on the nomination of asphalt fumes for listing in the National Toxicology Program's Report on Carcinogens, 12th Edition. AREC is made up of representatives from the Asphalt Institute, the Asphalt Roofing Manufacturers Association, and the National Roofing Contractors Association. Its mission includes the support of research into the potential health and environmental effects of asphalt in roofing manufacturing and application operations, as well as the development of new and improved measurement and control techniques, work practices and education and training materials to characterize and reduce exposure in the workplace and environment.

In letters dated June 16 and July 2, 2004, Drs. Rainer Fuhst and Paolo Boffetta have notified NTP that the Fraunhofer Institute and the International Agency for Research on Cancer have initiated studies of the potential carcinogenicity of asphalt fumes in both animals and humans, and these studies are expected to be completed within three years. As discussed in the July 12, 2004 letter from Peter Grass of the Asphalt Institute, these studies directly address the primary data gaps NTP identified when it last evaluated the carcinogenicity data on asphalt fumes in 1997-98, in response to a Priority Research Nomination submitted by NIOSH. A series of subsequent reviews by ACGIH, NIOSH, Cal/OSHA and, most recently, the WHO's International Programme on Chemical Safety, are all consistent with the previous findings by NIOSH and NTP that additional data are needed for a scientifically sound evaluation of the potential carcinogenicity of asphalt fumes. In addition, recent studies have found no dose-response relationship between exposure to asphalt fumes and lung cancer among U.S. asphalt roofing manufacturing and asphalt production workers, and suggest that field fumes generated in U.S. asphalt roofing application operations appear to have even lower potential biological activity than fractions of laboratory-generated asphalt fume

condensates that repeatedly tested negative in full lifetime rodent dermal carcinogenicity bioassays conducted by NIOSH.

For these reasons, AREC endorses and supports the recommendations of the Asphalt Institute and the United Union of Roofers, Waterproofers and Allied Workers that NTP should defer any formal review of asphalt fumes for listing in the RoC pending the completion of the ongoing studies.

Sincerely,

ASPHALT ROOFING ENVIRONMENTAL COUNCIL:

Peter T. Grass, President,
Asphalt Institute

Russell K. Snyder, Executive Vice President,
Asphalt Roofing Manufacturers Association

William. A. Good

William A. Good, Executive Vice President,
National Roofing Contractors Association