



**Patrick W. Beatty, Ph.D., DABT**  
Scientific Advisor

**Regulatory and Scientific Affairs**

1220 L Street, NW  
Washington, DC 20005-4070  
USA  
Telephone 202-682-8473  
Fax 202-682-8270  
Email [beattyp@api.org](mailto:beattyp@api.org)  
[www.api.org](http://www.api.org)

Dr. Lori White,  
Designated Federal Officer for the BSC  
Office of Liaison, Policy and Review  
Division of NTP, NIEHS,  
P.O. Box 12233, K2-03, Research  
Triangle Park, NC 27709

Dear Dr. White:

The American Petroleum Institute (API) is the primary trade association for the oil and gas industry in the United States and its membership includes more than 400 companies engaged in all aspects of the oil and gas industry, including the exploration, production, refining, transportation and marketing of crude petroleum and petroleum products. API is pleased to submit comments to the national Toxicology Program (NTP) in support of comments from the American Chemistry Council (ACC) on toxicology testing of individual isomers of trimethylbenzenes (TMB) proposed by the NTP.

API believes that tests of mixtures of the components of the C-9 fraction as found in the real world products to which individuals are exposed is more relevant to hazard identification and risk management. API believes that further hazard characterization testing is unnecessary in light of sufficient existing information from studies of C-9 aromatic mixtures and individual isomers. In particular, the proposed carcinogenicity testing is not adequately justified. The original C-9 test program under TSCA section 4 did not see a compelling reason to require carcinogenicity testing. QSAR considerations argue against positive results for most of the components of typical C-9 fractions.

The ACC comments present a thorough consideration of the toxicology of the C-9 Aromatic hydrocarbon fraction and comparison of the C-9 toxicology with available information on individual isomers of trimethylbenzene and other components of the C-9 aromatic fraction. This comparison supports the position that additional testing of individual TMB isomers is unnecessary, duplicative of existing information, and not relevant to the vast majority of real world exposures to TMBs. As such the proposed testing program is an inefficient use of research funds and resources and an unnecessary use of laboratory animals,

API requests that the NTP fully consider these comments as well as those of the American Chemistry Council.. Please feel free to contact me with any questions or should you require additional information.

Respectfully submitted,  
[Redacted]

Patrick Beatty, Ph.D., DABT