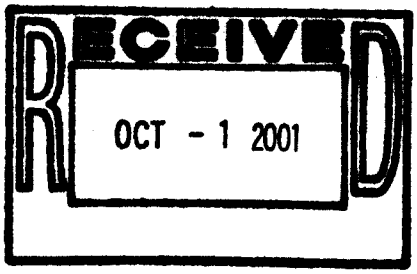
HADLEY & MCKENNA
ATTORNEYS AT LAW
1815 H STREET, N. W.
WASHINGTON, D. C. 20006

(202) 296-6300



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

Re: National Toxicology Program call for public comments on substances proposed for listing in the 11th edition of the Report on Carcinogens

- Nitrobenzene (98-95-3)

66 Federal Register 38430 *et seq.*, 2001

Dear Dr. Jameson:

Pursuant to Section 4 of the Administrative Procedure Act, as amended (5 U.S.C. Chapter 5, 2000) and the above-referenced National Toxicology Program (NTP) call for public comments, the Nitrobenzene Association, by its attorneys, hereby respectfully submits information requested.

The Nitrobenzene Association is an independent, not-for-profit business league (trade association) of the

producers of 100% of the nitrobenzene produced and consumed in the United States. The Association's members are: BASF Corporation; ChemFirst, Inc.; E.I. du Pont de Nemours and Company; and Rubicon Inc.

COMMENTS

In its call for comments, NTP specifically solicited public input on, among others, current production data, use patterns, and human exposure information.

Production Data

In the United States four companies produced 2,375 million pounds of nitrobenzene at five locations during calendar year 2000, the most recent period for which data are complete.

During calendar year 2000, there was no import of nitrobenzene into the United States. Exports were either also zero or miniscule. Thus, all nitrobenzene produced in the U.S. should be considered to have been consumed here.

Use Patterns

More than 97% of domestically-produced nitrobenzene is used captively by its producers to manufacture aniline. The recent demand for aniline has caused marked annual increases in nitrobenzene consumption for its production.

Other uses for nitrobenzene, accounting for about 60 million pounds, include the production of pharmaceutical intermediates and iron oxide pigments. Very small volumes may also be converted to various intermediates for use in the manufacture of black dyes and certain resins.

Nitrobenzene is reportedly no longer used as an intermediate in the synthesis of pesticides or in rubber chemicals.

Human Exposure Information

In production facilities the potential for exposure to nitrobenzene is minimal, primarily due to the fact that the material is manufactured continuously in a closed process. Those very low exposures that do occur are typically the

result of minor or fugitive leaks, as from a flange or when the process is sampled for quality measurements.

In the event of a larger release of nitrobenzene, as in a line failure, workers are required to wear protective gear to prevent skin exposure and respirators to prevent inhalation exposure above the permitted limit.

We appreciate the opportunity to submit these comments and do not hesitate to contact us if you have any questions or need further information.

Respectfully submitted,
The Nitrobenzene Association
by

Signature

Joseph E. Hadley, Jr.
for Hadley & McKenna
its attorneys