



JUL - 9 2002

Dr. Michael Shelby
 CERHR Director
 NIEHS
 79 T.W. Alexander Drive
 Building 4401, Room 103
 P.O. Box 12233
 MD EC-32
 Research Triangle Park, NC 27709

July 8, 2002

Re: Written Comments on April 2002 Methanol Expert Panel Report

Dear Dr. Shelby:

The American Forest & Paper Association (AF&PA) submits the following comments in response to the NTP Center for Evaluation of Risks to Human Reproduction's May 8, 2002 request for comments on the NTP-CERHR Expert Panel Report on the Developmental and Reproductive Toxicity of Methanol (the "Report"), 67 Fed. Reg. 30,942. AF&PA is the national trade association of the forest, paper, and wood products industry. AF&PA represents more than 300 member companies and related trade associations involved in growing, harvesting, and processing wood and wood fiber: manufacturing pulp, paper, and paperboard from both virgin and recycled fiber: and producing solid wood products.

AF&PA has a substantial interest in the assessment of risks presented by exposure to methanol, because naturally occurring methanol is released during the manufacture of wood products and wood pulp. AF&PA previously submitted comments, dated September 7, 2001 and January 11, 2002, on a draft of the Report. Forest products industry consultants offered oral comments during the Methanol Expert Panel's meeting on October 15-17, 2001. AF&PA also responded, on October 2, 2000, to CERHR's August 17, 2000 request for data to be reviewed by the Methanol Expert Panel.

AF&PA submitted extensive analysis of the potential for exposure to methanol emissions to create risks to human health and the environment, including adverse effects on human reproduction and development, in connection with its March 8, 1996 petition to EPA to remove methanol from the list of "hazardous air pollutants" under the Clean Air Act. Those materials were also provided to CERHR in AF&PA's October 2, 2000 submission. AF&PA strongly believes that this information, along with the additional information presented in the Report and in AF&PA's oral and written comments on the draft Report, demonstrates that sufficient data are