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U.S. Environmental Protection Agency
1200 Pennsylvania Ave., NW
Washington, DC 20460
Submitted via www.regulations.gov

**Re: Submission of Comments for Docket ID No. EPA-HQ-ORD-2011-0391
U.S. EPA IRIS Toxicological Review of Benzo[a]pyrene
(Public Comment External Review Draft) EPA/635/R-13/138a-b, 2013.**

The American Coke and Coal Chemicals Institute¹, the American Fuels and Petrochemical Manufacturers², the American Petroleum Institute³, the Asphalt Institute⁴, the Association of American Railroads⁵, Beazer East, Inc.⁶, and the Pavement Coatings Technology Council⁷ provide the attached set of comments in response to Docket ID No. EPA-HQ-ORD-2011-0391 U. S. EPA IRIS Toxicological Review of Benzo[a]pyrene (Public Comment External Review Draft) EPA/635/R-13/138a-b, 2013.

The comments are arranged following NCEA's Proposed Draft Charge to the Science Advisory Board for the IRIS Toxicological Review of Benzo[a]pyrene. We hope you will give full consideration to the information provided. Please contact me by telephone (202-682-8344) or email (whiter@api.org) with questions or requests for additional information.

Respectfully submitted,

American Coke and Coal Chemicals Institute
American Fuels and Petrochemical Manufacturers
American Petroleum Institute
Asphalt Institute
Association of American Railroads
Beazer East, Inc.
Pavement Coatings Technology Council

ATTACHMENT - Comments on Docket ID No. EPA-HQ-ORD-2011-0391 U.S. EPA IRIS Toxicological Review of Benzo[a]pyrene (Public Comment External Review Draft) EPA/635/R-13/138a-b, 2013.

1 The American Coke & Coal Chemicals Institute (ACCCI) represents companies accounting for 100% of the metallurgical coke and coal chemicals production in the U.S.

2 The American Fuel and Petrochemical Manufacturers (AFPM) is a national trade association whose members comprise more than 400 companies, including virtually all United States refiners and petrochemical manufacturers. AFPM's members supply consumers with a wide variety of products and services that are used daily in homes and businesses.

3 The American Petroleum Institute (API) is the only national trade association that represents all aspects of America's oil and natural gas industry. Our more than 500 corporate members, from the largest major oil company to the smallest of independents, come from all segments of the industry. They are producers, refiners, suppliers, pipeline operators and marine transporters, as well as service and supply companies that support all segments of the industry.

4 The Asphalt Institute (AI) is the international trade association of petroleum asphalt producers, manufacturers and affiliated businesses. The Asphalt Institute's mission is to promote the use, benefits, and quality performance of petroleum asphalt, through environmental, marketing, research, engineering and technical development, and through the resolution of issues affecting the industry.

5 The Association of American Railroads (AAR) is a trade association whose membership includes freight railroads that operate 72 percent of the line-haul mileage, employ 92 percent of the workers, and account for 95 percent of the freight revenue of all railroads in the United States; and passenger railroads that operate intercity passenger trains and provide commuter rail service.

6 Beazer East, Inc.

7 The Pavement Coatings Technology Council (PCTC) network of manufacturers and applicators are dedicated to extending the life of asphalt through maintaining highest quality manufacturing and application standards.