

January 24, 2006

Dr. George Gray  
Assistant Administrator for Research and Development  
U.S. Environmental Protection Agency

VIA FACSIMILE - (202)565-2430

Dear Dr. Gray,

I am writing to request a meeting with you to discuss certain improvements to EPA's hazard and risk assessment programs, including the agency's Integrated Risk Information System.

ACMA represents the many smaller U.S. companies that use styrene-crosslinked polyester resin and glass or carbon fiber to make products such as underground gasoline storage tanks, wind turbine blades, car, truck and RV components, playground equipment, ladder rail, tub/shower units and bathroom vanities, and thousands of other products. Styrene is one of the chemicals currently under review by EPA for updating the IRIS database, and has also been the subject of a recent study by EPA's National Health and Environmental Effects Research Laboratory.

EPA's hazard assessment activities related to styrene may have profound impacts on our smaller companies. While our industry is committed to protecting our employees, plant neighbors and customers, we are concerned that EPA's assessments may have significant negative economic impacts to our industry, and that such impacts may significantly outweigh any public health benefits. We believe that many of these negative impacts can be mitigated by changes in the procedures EPA uses to make its determinations and communicate them to the public.

I understand that EPA has met with representatives of the American Chemistry Council to discuss IRIS reforms. However, small businesses are likely to have concerns with EPA's hazard and risk assessment programs that are not similar to ACC's concerns. And compared to large chemical manufacturers, small businesses can also suffer much greater negative impacts as a result of EPA's chemical assessments and related communications.

For IRIS and other agency hazard or risk assessment programs, and related communications activities, we suggest that EPA establish opportunities for interested and knowledgeable parties outside of EPA to participate in discussions regarding four areas of concern: 1) the science underlying EPA decisions and the potential for research to inform those decisions further, 2) the basis for the science policy decisions that need to be made (e.g., the classification category, the emphasis given to mode of action data), 3) the weight that the potential negative economic or other societal impacts (along with the public health benefits) should be given in deciding the schedule for further research and decisions, and 4) the manner in which final decisions are communicated to the public.

We would very much appreciate an opportunity to discuss our concerns and reform ideas with you in greater detail, and explain why we believe they are necessary because of current practices within EPA. We have also discussed our suggestions with the American Bakers Association and other groups representing smaller businesses, and they share our concerns and will participate in a meeting with you. Representatives of our industry will be in Washington on February 13, 15 and 17, and, if you are available, it would be convenient for us to meet with you on one of those dates.

Thank you for your attention to this matter.



John Schweitzer  
Senior Director of Government Affairs  
(734) 622.0162 - jschweitzer@acmanet.org

cc: Dr. Anne Giesecke, American Bakers Association