

American Composites Manufacturers Association

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Kevin,

I called you Jan. 6 regarding the ongoing EPA/DOD dialogue on IRIS, and to discuss whether small businesses should be involved in the IRIS reform process. We understand that DOD has certain problems with IRIS that they are trying to resolve in the discussion with EPA. We also believe that the large chemical manufacturers, represented by the American Chemistry Council, may soon be admitted as a partner in this dialogue.

Small businesses are likely to have concerns with EPA's hazard and risk assessment programs, including IRIS, that are not similar to DOD's or ACC's concerns. Small businesses can also suffer greater negative impacts as a result of EPA's chemical assessments and related communications.

For example, EPA is currently reviewing the data on styrene (a chemical widely used in the composites industry) for updating the IRIS listing. The scientific data on styrene could be read as being potentially consistent with three of EPA's possible cancer classifications: Likely Carcinogen, Suggestive Evidence, and Not Likely. Under EPA's Cancer Guidelines, the agency will have to select one of these three classifications for styrene.

For the small businesses in our industry, this choice will have profound consequences. Classification of styrene as either a "likely" or "suggestive evidence" carcinogen will mean that the plant managers of our 3,000+ small companies will be faced with workers and community members needing to understand if they should be afraid of getting cancer. This is not a communications activity for which these business people are trained or for which they have the needed credibility. Worker or community concern resulting from EPA's classification may result in business disruption, denial of air permits, and/or tort claims by workers or plant neighbors fearing that they have been harmed from styrene exposure.

We are not interested at this time in trying to influence EPA's classification decision for styrene. However, we are interested in seeing the IRIS process reformed so that, when EPA makes these kinds of decisions, there are formal 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, etc.), (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.

If EPA can be persuaded to invite other stakeholders to join in their dialogue with DOD, ACMA would be very willing to participate as an organization representing small businesses that have a real stake in IRIS.

Thank you for your interest in this issue,



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