

September 26, 2011

The Honorable William Daley
Chief of Staff
The White House
1600 Pennsylvania Avenue, NW
Washington, DC 20500

Via fax: 202-456-2461

Dear Mr. Daley:

We are owners or managers of small and medium-sized companies that use the chemical styrene to manufacture useful products and provide employment, or provide raw materials to this industry. Recent actions taken by the Department of Health and Human Services (HHS) National Toxicology Program (NTP) to list styrene as “reasonably anticipated to be a human carcinogen” have placed us and thousands of other owners and managers in the untenable position of having to explain to employees and plant neighbors both that we use styrene safely, and that HHS’ action is ill-founded and irresponsible.

Smaller manufacturers in particular find it very difficult to operate if people are afraid of their operations. Left unchallenged, we expect the HHS styrene listing in the 12th Edition of the *Report on Carcinogens (RoC)* in mid-June to have the long-term effect of moving manufacturing jobs to Mexico, China, France or one of the many other countries that have not taken such an obviously misleading position regarding styrene. In addition, the HHS action will also cause further public confusion about health risks and reasonable precautions.

We write today to request your assistance in commissioning a National Academy of Sciences (NAS) study on the alleged link between human cancer and exposure to styrene for the reasons outlined below.

First and foremost, our request is driven by the conflict of authorities both within and outside of the federal government regarding the health effects of styrene, and public confusion that has resulted from HHS’ listing of styrene in the *RoC*. During its assessment of styrene, HHS staff was fully aware that its conclusions were contrary to those of all other reviewing agencies, governments and experts, but failed to address this fairly and transparently. In reaching its contrary position, HHS staff failed to acknowledge or adequately address styrene assessments conducted by the following:

- HHS’ Agency for Toxic Substances and Disease Registry, which recently reviewed the same data and found that styrene “may be a weak carcinogen”, in sharp contrast with NTP’s “reasonably anticipated to be a human carcinogen” conclusion. (After the styrene industry pointed out the discrepancy between these two assessments, ATSDR staff issued a paper essentially claiming that “may be a weak carcinogen” *means the same as*

“reasonably anticipated carcinogen”. In our view, this can only serve to increase public confusion, and further illustrates the need for improved integrity and quality of the HHS chemical assessment programs.)

- The Texas Commission on Environmental Quality, which found in its 2008 review that “no epidemiologic evidence has been published to date to conclude that styrene exposure presents an excessive carcinogenic risk to humans”, and using EPA’s 2005 cancer assessment guidance determined that the “data are inadequate for an assessment of human carcinogenic potential of styrene”.
- The International Agency for Research on Cancer, which reviewed styrene data in 2002 and decided to list styrene not as a “probable”, but as a “possible” carcinogen.
- Health Canada, which concluded in 1994 that styrene is “non-toxic”, and as such does not require regulation under Canadian Environmental Protection Act.
- European Union scientists, who recently decided that styrene should not be classified, labeled or regulated as a carcinogen.
- A *blue ribbon* panel of internationally recognized epidemiologists, chaired by Dr. Paulo Boffetta, formerly with the World Health Organization and now a professor at the Mount Sinai School of Medicine, which determined in 2009 that the “available epidemiologic evidence does not support a causal relationship between styrene exposure and any type of human cancer”.
- Styrene researcher Dr. Elizabeth Delzell of the University of Alabama, who argued in a recent letter to HHS that NTP had misused her data and that the “available scientific evidence is not sufficient to conclude that styrene causes lymphoma, leukemia or other cancers”.
- Dr. Lorenz Rhomberg and his colleagues at Gradient Corporation, who recently concluded that “the evidence does not support the characterization of styrene as ‘reasonably anticipated to be a human carcinogen,’ and styrene should not be listed in the *Report on Carcinogens*”.

This conflict of authorities created by NTP and the resulting public confusion is exacerbated not just due to the scientific controversy, but also because of conflicting statements by HHS staff. Department staff cautioned that workers should “be aware of” a risk of cancer related to styrene. However, HHS guidance documents also state that a listing in the *RoC* does not indicate that anyone is actually at risk. Moreover, the staff has stated publicly that “occupational exposures to styrene have declined” and, during a recent press conference, staff members indicated they have no intention of changing their own behavior regarding styrene or styrene-based products. Finally, HHS staff has provided no guidance as to what precautions or other actions workers should take once they “become aware”. Overall, we find this behavior to be highly irresponsible.

A definitive carcinogenicity hazard assessment on styrene from the respected and independent National Academy of Sciences would go a long way towards settling the scientific controversy and allow the Administration to provide responsible guidance to workers and members of the

public. The NAS should look carefully at newly available styrene science, and also compare the HHS procedures and listing criteria for the *RoC* against the NAS-endorsed best practices for hazard and risk assessment. Finally, an NAS styrene review should allow full and transparent opportunity for public input on both the charge questions and the scientific data to be considered by its panel.

Clearly, it is in the public interest to get the science right, and we ask that the Administration commission an NAS study as soon as possible. The future of our companies and the thousands of workers whom we employ are in serious jeopardy if this matter is not addressed in a sensible scientific forum.

Thank you for your consideration of our request. We would be happy to provide any further information you might require, and would welcome an opportunity to speak with you about this matter in person. If you have questions in this matter, please contact Mr. John Schweitzer, American Composites Manufacturers Association, 703.525.0511 or jschweitzer@acmanet.org.

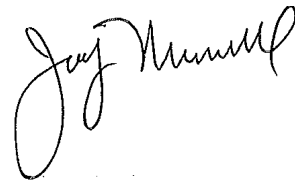
Sincerely,



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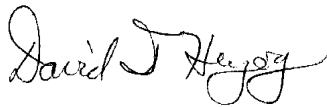
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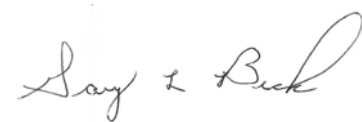
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