

April 28, 2008

Stephen Johnson, Administrator
Environmental Protection Agency

George Gray, Assistant Administrator, Office of Research and Development
Environmental Protection Agency

Dear Sirs:

On April 10, 2008, U.S. EPA's Office of Research and Development announced revisions in the process it uses to update the Integrated Risk Information System (IRIS), which provides human health risk information on more than 540 environmental contaminants. We call on EPA to reverse those changes and instead institute a process that will level the playing field between those impacted by environmental pollution and those responsible for it.

IRIS is the data base used by EPA, state, territorial, and tribal environmental agencies throughout the United States, as well as health agencies throughout the world, to set standards that limit the release of toxic chemicals and which determine objectives for hazardous waste cleanup. Though little known, IRIS's numerical values have a direct effect on the water we drink, the air we breathe, and the soil that underlies our homes, schools, businesses, and parks.

EPA states that the new IRIS process will "increase its transparency and efficiency." We believe it will instead institutionalize the growing influence of federal polluting agencies such as the Defense Department, Department of Energy, and NASA over the establishment of toxicity standards in the U.S. These agencies are the biggest contributors to toxic Superfund sites, as well as thousands of additional contaminated properties, across the country. Their recent intervention in the IRIS process has weakened and delayed EPA's findings on such widespread toxic contaminants as perchlorate, an essential component of solid rocket fuel, and the solvent trichloroethylene (TCE), which is the most common pollutant in the nation's Superfund sites. These agencies have a conflict of interest, because environmental standards, based on IRIS values, restrict their operations and those of their contractors, and changes in those standards for just one high-profile substance could cost or save them billions of dollars.

The new process is an attempt to cement a privileged position for federal polluting agencies, in which they would have recurring, generally secret ("deliberative") input into EPA's findings. We believe that polluters, whether or not they are government agencies, should have no greater access to EPA risk assessors than does the public at large.

Furthermore, the federal polluting agencies will initiate targeted discussions with

EPA on the development of risk assessments for chemicals that they determine to be critical to their missions. We believe that the mission-criticality of a substance has nothing to do with its toxicity, which is and should be based on science.

EPA, under pressure from the Bush White House, has given the foxes the keys to the environmental protection henhouse. We call upon EPA and the Bush Administration to abandon these revisions to IRIS and instead adopt an approach that generates and applies rigorous, independent, and timely assessments of chemicals that impact human health and the environment, based upon the following three principles:

1. All stakeholders, including the affected public, private polluters, and federal polluting agencies, should have the same access to the decision-making process for the assessment of hazardous substances.
2. Federally funded risk-relevant research should be managed by agencies that do not have conflicts of interest—that is, agencies that will incur significant costs or encumbrances associated with more protective health and environmental standards should not control these research activities.
3. The entire process of assessing hazardous substances should be carried out in the sunshine, with oversight by the public, the press, and by Congress.

Our health and the health of future generations depends upon it.

Sincerely,