

September 17, 2008

Stephen Johnson, Administrator
U.S. Environmental Protection Agency
Ariel Rios Building
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

OPEN LETTER TO U.S. EPA FROM
ENVIRONMENTAL AND PUBLIC HEALTH ORGANIZATIONS
OPPOSING WHITE HOUSE INTERFERENCE IN EPA IRIS CHEMICAL
ASSESSMENT PROGRAM

Dear Administrator Johnson:

The undersigned environmental and public health groups join together in urging you to withdraw recent changes to the U.S. Environmental Protection Agency's (EPA) chemical assessment program, the Integrated Risk Information System (IRIS). The new policy issued in April, without opportunity for public notice and comment, will prolong the public's exposure to unsafe levels of toxic chemicals and hinder the ability of EPA and states to establish health-protective standards for drinking water, air pollution, and cleanup of toxic waste sites. We urge you to reverse these changes to help restore scientific integrity and transparency to EPA decision-making.

The EPA established the IRIS program in 1985 to determine the human health risks related to exposures from hundreds of toxic chemicals. IRIS integrates in-house research from EPA scientists, peer review by outside experts, and input and comments from the public. Under recent procedural changes forced on the program by the White House Office of Management and Budget (OMB), however, other federal agencies with significant conflicts of interest such as the Defense Department are now able to weaken and delay the Agency's own scientific assessments of hazardous chemicals.

For many years, IRIS assessments were developed by EPA scientists. Drafts were released simultaneously for public comment and external (independent expert) peer review. OMB and government agencies such as the Defense or the Energy Department (DOD or DOE), that sometimes had a stake in the outcome of the evaluation because of their obligations to address contamination at federal facilities, had an opportunity to review and comment on the draft when it was released for public review and comment. Comments from these agencies, whether of a scientific nature or policy-based were available for public scrutiny.

The new process established by the White House turns this process on its head: it invites the injection of non-scientific considerations into the IRIS assessments, and further, it shields from public scrutiny the input from other parts of the government with a potential financial or political interest in the outcome of a particular assessment. When political appointees and polluting agencies are able to interfere in a non-transparent and inappropriate manner the whole process is severely compromised. This type of interference has already led to years-long delays in setting health protective standards for widespread environmental contaminants including trichloroethylene (TCE), formaldehyde, and the rocket fuel additive perchlorate.

The new 2008 IRIS process introduces three new opportunities for non-health agencies and OMB to weigh in on EPA's health assessments, and allows other agencies to impose an 18 month delay for chemicals they deem to be "mission critical." Importantly, interagency and OMB comments will be shielded from public view, preventing peer-review of scientific arguments or scrutiny of policy arguments that should not be considered in a scientific assessment of health risks posed by chemicals. In addition, the Agency must essentially receive "sign-off" from OMB and other agencies before a health assessment can be finalized.

The U.S. Government Accountability Office (GAO) recently released its review of the new process, in a report entitled: *Low Productivity and New Interagency Review Process Limit the Usefulness and Credibility of EPA's Integrated Risk Information System*. This report provides a detailed and highly critical assessment of the failures of the IRIS program to meet its deadlines and requirements, blaming in large part the interference by polluting agencies and political appointees. The GAO report predicts that the new process will produce IRIS assessments that lack credibility, and will worsen what is already a critical backlog of new and updated assessments.

Without an open, credible, effective, science-based, fully-funded program to develop these assessments without political interference from the White House or other federal agencies, EPA will continue to fall further behind in a fundamental program that serves as the foundation for fulfilling its mission: protecting the environment and public health.

We urge you to withdraw this damaging policy and to work towards restoring integrity to EPA's program for assessing the threats chemicals pose to public health.

If you or your staff have any questions please contact Jennifer Sass, Natural Resources Defense Council. Tel: 202-289-6868, Email: jsass@nrdc.org

Respectfully,

GREEN GROUP COALITION MEMBERS
Center for International Environmental Law
Clean Water Action

Defenders of Wildlife
Earthjustice
Environmental Defense Fund
Friends of the Earth US
Greenpeace
League of Conservation Voters
Natural Resources Defense Council
Pew Charitable Trusts
Physicians for Social Responsibility
Sierra Club
Union of Concerned Scientists
U.S. Public Interest Research Group (PIRG)

HEALTH AND ENVIRONMENTAL ADVOCACY ORGANIZATIONS

Advocates for Environmental Human Rights
Alaska Community Action on Toxics
Alliance for Healthy Homes
American Autoimmune Related Diseases Association
Asthma and Allergy Foundation of America
Birth Defect Research for Children
Breast Cancer Fund
Center for Inquiry
Center for Science in the Public Interest
Children's Environmental Health Network
Citizens' Environmental Coalition
Clean New York
DES Action USA
Ecology Center
Environment California
Environment Illinois
Environmental Health Fund
Environmental Health Initiative American Association on Intellectual and
Developmental Disabilities
Environmental Working Group
Farmworker Association of Florida
Galveston Baykeeper
Global Community Monitor
Glynn Environmental Coalition
Government Accountability Project
Healthy Building Network
Healthy Child Healthy World
Healthy Schools Network, Inc.
Huntington Breast Cancer Action Coalition, Inc.
Indiana Toxics Action
Institute for Children's Environmental Health
Kentucky Environmental Foundation

National Autism Association
National Center for Environmental Health Strategies, Inc.
OMB Watch
Pesticide Action Network North America
Prevention Is The Cure, Inc.
SafeMinds
Sciencecorps, Inc.
Toxics and Sustainable Production Natural Resources Council of Maine
Washington Toxics Coalition
WorkSafe, Inc.

cc:

Senator Barbara Boxer
Senator James Inhofe
Senator Hillary Clinton
Senator John Barrasso
Rep. John Dingell
Rep. Joe Barton
Rep. Bart Stupak
Rep. John Shimkus
Rep. Bart Gordon
Rep. Ralph Hall
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