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April 29, 2008

Stephen Johnson, Administrator  
Environmental Protection Agency

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

Dear Administrator Johnson and Assistant Administrator Gray,

On April 10, 2008, U.S. EPA's Office of Research and Development announced revisions that will delay and weaken the process it uses to update the Integrated Risk Information System (IRIS), which provides human health risk information on more than 540 environmental contaminants.<sup>1</sup> We call on EPA to abandon these proposed changes and instead provide sufficient resources for the IRIS program to conduct rigorous, independent, and timely assessments of chemicals that impact human health and the environment, including chemical pollutants that are considered to be "mission critical" by Federal agencies such as the Department of Defense and Department of Energy.

EPA assessments of regulated chemicals are publicly available on its IRIS database which contains EPA scientific consensus positions on potential human health effects from environmental contaminants. Although not a legal standard, the information from IRIS assessments is used by federal, state, and tribal regulators throughout the US and worldwide, in combination with exposure data, to set limits on toxic chemical releases and set cleanup standards for hazardous waste sites. The IRIS numerical values directly affect the safety of the water we drink, the air we breathe, and the soil that underlies our homes, schools, businesses, and parks.

The global importance of IRIS assessments is demonstrated by the fact that for the month of April 2008 the database website received on average approximately 600 requests daily from all over the world.<sup>2</sup>

EPA states that the new IRIS process will facilitate "increased participation by other federal agencies and the public ... and opportunities for other federal agencies to

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<sup>1</sup> IRIS home page <http://cfpub.epa.gov/ncea/iris/index.cfm>

<sup>2</sup> See IRIS web statistics at <http://www.epa.gov/reports/objects/iriswebp/iriswebp/iriswebp/>



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conduct research to fill data gaps.”<sup>3</sup> It does this by inserting an additional three opportunities for other federal agencies and the Office of Management and Budget to weigh-in on chemicals determined to be “mission critical,” bringing their total number of intervention points from one to four. We are concerned that this or future Administrations may attempt to shield from public view efforts by federal agencies, through their expanded comment opportunities, to weaken IRIS assessments of particular chemicals, based upon a claim of deliberative process. Moreover, the new process specifically provides for a delay of up to 18 months if the Agencies opt to generate and submit new data on their pollutants under consideration.<sup>4</sup> The new process will bring a painfully slow program to a virtual halt.

We are very concerned that the new process will introduce delays, derail assessments, and institutionalize the growing influence of federal agencies such as the Department of Defense, Department of Energy, that are among the biggest contributors to toxic Superfund sites, as well as hundreds of additional contaminated counties across the country. These agencies have a clear interest in the development of risk assessments that lead to less protective environmental standards. Through their intervention in the IRIS process, these agencies have already successfully advocated to weaken 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.<sup>5</sup>

Already the IRIS program finalizes only several assessments annually, far too few given the large number of hazardous chemicals affecting our environment and communities. EPA must be provided with the staff and resources to finalize at least a dozen assessments each year. Moreover, the entire process of assessing hazardous substances should be carried out in the sunshine, with oversight by the public, the press, and by Congress.

The EPA IRIS program serves a critical scientific service to the public, and must be preserved and protected to conduct its work without political interference. EPA’s recent changes undermine the scientific integrity of the IRIS process, and weaken protections for public health and the environment. We urge you to reverse course and abandon these changes.

Respectfully,

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Senior Attorney, NRDC

Cal Baier-Anderson, Ph.D.  
Staff Scientist, EDF

<sup>3</sup> IRIS process (2008 updated) <http://cfpub.epa.gov/ncea/cfm/recordisplay.cfm?deid=190045>

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<sup>5</sup> Scorecard. Most common pollutant at Superfund sites is TCE. <http://www.scorecard.org/env-releases/land/us.tcl#contaminants>