Congress of the United States
Washington, DC 20515

October 24, 2017

The Honorable Scott Pruitt
Administrator
U.S. Environmental Protection Agency Headquarters
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

Dear Administrator Pruitt:

We write with great interest and concern regarding the Agency's management of the Integrated Risk Information System ("IRIS") program, and specifically the Environmental Protection Agency's (EPA) 2010 IRIS Toxicology Review of Chloroprene (Chloroprene Review).

As you are aware, the IRIS program was originally developed to identify and characterize the health hazards found in the environment. For many years, the program has served as an effective way to advance EPA's mission of protecting human health and the environment. However, in recent years, the Government Accountability Office and the National Research Council have identified examples where they believe IRIS reviews conducted by the Agency needed improvement. [1,2,3] Congress has also given EPA similar directives to improve deficiencies within the IRIS program.[4]

The Chloroprene Review is one example of the challenges created by IRIS reviews. Chloroprene is the chemical building block of neoprene, a synthetic rubber with numerous military, automotive, and medical applications. Denka Performance Elastomer (DPE) is the only manufacturer of chloroprene in the United States and operates a plant in LaPlace, Louisiana that directly employs 200-250 people in manufacturing jobs and another 125 to 150 contractors. The data offered in the Chloroprene Review was used in EPA's 2011 National Air Toxics Assessment (NATA), which identified the LaPlace facility as creating the greatest offsite risk of cancer in the country. As a result, the Louisiana Department of Environmental Quality (LDEQ) has worked with EPA and DPE to measure concentrations of chloroprene emissions around the plant over a period of several months. Additionally, DPE has voluntarily agreed to an Administrative Order of Consent with LDEQ to install new control technologies and other measures designed to reduce chloroprene emissions.

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[1] National Research Council. 2011. *Review of the Environmental Protection Agency's Draft IRIS Assessment of Formaldehyde*. Washington, DC: The National Academies Press. https://doi.org/10.17226/13142
[2] United States Government Accountability Office. 2011. *Chemical Assessments. Challenges Remain with EPA's Integrated Risk Information Program*. Washington, DC. http://www.gao.gov/assets/590/586620.pdf
[3] National Research Council. 2014. *Review of EPA's Integrated Risk Information System (IRIS) Process*. Washington, DC: The National Academies Press. https://doi.org/10.17226/18764
[4] Senate Report 114-281

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However, EPA has also separately suggested a lifetime ambient air target concentration that DPE says may be technologically impossible to achieve.[5] It is also our understanding that EPA may not have fully considered the findings of at least one epidemiological study which concluded that cancer risk in workers exposed to chloroprene is not statistically significant.[6] Additionally, according to the Louisiana Tumor Registry data, there is no indication of any increased rates of either respiratory or liver cancer in St. John the Baptist Parish. In fact, the Parish has one of the lowest rates for respiratory and liver cancer in the state.[7, 8]

On June 26, 2017, DPE filed a formal Request for Correction (RfC) to the Chloroprene Review, which is currently under review at your Agency. We respectfully request that the RfC be granted. Should the EPA maintain its current position, DPE believes their operations in Louisiana could be severely curtailed or ceased. While we respect the intentions of the IRIS program, we believe it is the Agency's duty to responsibly use data to protect Louisiana citizens without causing undue alarm.

Thank you for your consideration. Please contact us at your convenience should you have any questions.

Sincerely,

Bill Cassidy, M.D.

Bill Cassidy, M.D.
United States Senator

John Kennedy
United States Senator

Garret Graves
United States Congressman

Clay Higgins
United States Congressman

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[5] There is no current federal or state standards for allowable concentrations of chloroprene in the air, but EPA has suggested a target lifetime average of 0.2 micrograms/cubic meter. Once all control measures are in place, LDEQ will again asses emissions at DPE. Classified as a non-carcinogen the LDEQ occupational Toxic Air Pollutant standard for chloroprene is 857 micrograms/cubic meter.

[6] Gary M. Marsh et al., Mortality patterns among industrial workers exposed to chloroprene and other substances, Chemico-Biological Interactions (2006), doi:10.1016/j.cbi.2006.08.012

[7] State Cancer Profiles. Incidence Rate Report for Louisiana by Parish, Liver & Bile Duct, 2010-2014. https://statecancerprofiles.cancer.gov/incidencerates/index.php?stateFIPS=22&cancer=035&race=00&sex=0&age=001&type=incd&sortVariableName=rate&sortOrder=default#results

[8] State Cancer Profiles. Incidence Rate Report for Louisiana by Parish, Lung & Bronchus, 2010-2014. https://statecancerprofiles.cancer.gov/incidencerates/index.php?stateFIPS=22&cancer=047&race=00&sex=0&age=001&type=incd&sortVariableName=rate&sortOrder=default#results