North American Metals Council
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April 29, 2016

Via E-Mail

Mary A. Ross, Ph.D.
National Center for Environmental Assessment
U.S. Environmental Protection Agency
Mail Code 8601P
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

Re: Notice of the Availability of the IRIS Program General Comments Docket and the IRIS Program Public Science Meetings for Calendar Year 2016; 81 Fed. Reg. 18625 (Mar. 31, 2016)

Dear Dr. Ross:

The North American Metals Council (NAMC)[1] urges the U.S. Environmental Protection Agency (EPA) to reverse its decision to discontinue notifying the public of draft Integrated Risk Information System (IRIS) assessments via the *Federal Register*, as announced in the March 31, 2016, Notice of the Availability of the Iris Program General Comments Docket (81 Fed. Reg. 18625). While NAMC fully supports EPA's use of the IRIS website as a means to communicate with the public, it should not be the only method of notification for draft IRIS assessments. Instead, the IRIS website notices should supplement announcements also made in the *Federal Register*.

The regulated community and other stakeholders long have trusted the *Federal Register* as a reliable and comprehensive source of information regarding ongoing and proposed governmental actions at the federal level. It is convenient for stakeholders to consult the *Federal Register* on a daily basis to see what actions the various federal agencies and departments are taking or proposing to take. Accessing the innumerable websites at every agency that may be of interest on a daily basis is not practical for most stakeholders and other members of the general

[1] NAMC is an unincorporated, not-for-profit group formed to provide a collective voice for North American metals producers and users (*i.e.*, the North American "metals industry") on science- and policy-based issues that affect metals in a generic way. NAMC members include trade associations as well as individual companies.

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public. Eliminating the *Federal Register* as a vehicle for public announcements does not provide a more effective method of communicating; in fact, it has the opposite effect.

Further, as noted in comments from the American Chemistry Council, the decision to post some IRIS-related documents in the *Federal Register* (*e.g.*, external peer review draft IRIS assessments) while specifically excluding draft IRIS assessments will cause confusion among public stakeholders.

NAMC respectfully requests EPA to continue to use the *Federal Register* as a method to communicate on IRIS activities, in addition to notices posted on the IRIS website. Thank you for your consideration.

Sincerely,

Kathleen M. Roberts
Executive Director, NAMC

cc: Kenneth Olden, Ph.D., EPA (via e-mail)
Thomas Burke, Ph.D., EPA (via e-mail)
Mr. Lek G. Kadeli, EPA (via e-mail)