ECOS

THE
ENVIRONMENTAL
COUNCIL OF
THE STATES

50 F Street, N.W.
Suite 350
Washington, D.C. 20001

Tel: (202) 266-4920
Email: ecos@ecos.org
Web: www.ecos.org

Todd Parfitt
Director, Wyoming Department of Environmental Quality
PRESIDENT

Becky Keogh
Director, Arkansas Department of Environmental Quality
VICE PRESIDENT

Jim Macy
Director, Nebraska Department of Environmental Quality
SECRETARY-TREASURER

John Linc Stine
Commissioner, Minnesota Pollution Control Agency
PAST PRESIDENT

Carolyn Hanson
Acting Executive Director

March 8, 2018

The Honorable Mitch McConnell
Majority Leader
U.S. Senate
317 Russell Senate Office Building
Washington, DC 20510

The Honorable Paul Ryan
Speaker
U.S. House of Representatives
H-232, United States Capitol
Washington, DC 20510

The Honorable Chuck Schumer
Minority Leader
U.S. Senate
322 Hart Senate Office Building
Washington, DC 20510

The Honorable Nancy Pelosi
Minority Leader
U.S. House of Representatives
233 Cannon House Office Building
Washington, DC 20501

Re: Preserving the U.S. Environmental Protection Agency's Integrated Risk Information System

Dear Leaders McConnell, Schumer, Ryan, and Pelosi:

The Environmental Council of States (ECOS), the nonpartisan, national association of state and territorial environmental agency leaders, writes to urge you to support retaining the U.S. Environmental Protection Agency's (U.S. EPA) Integrated Risk Information System (IRIS) Program's funding and personnel with the Office of Research and Development (ORD). The IRIS Program is currently located in U.S. EPA's National Center for Environmental Assessment in ORD. Retaining IRIS within ORD will help to ensure that state public health and environmental protection programs can continue to rely on IRIS' invaluable and impartial health hazard assessments.

The IRIS Program's identification and characterization of chemical health hazards plays a vital role in states' efforts to protect their residents and environments against harmful toxic exposures. Its assessments provide important information that helps strengthen the science underlying a broad range of states' health and environmental protections, including regulating air and water pollution, cleaning up soil and contaminated drinking water aquifers, and ensuring the safe and appropriate use of pesticides.

The most recent National Academies of Sciences' review of the IRIS program recognizes its importance to state agencies and other organizations in "setting regulatory standards, establishing exposure guidelines, and estimating risks to exposed populations." (The Nation Academies of Sciences, Engineering, and Medicine, Review of EPA's Integrated Risk Information System (IRIS) Process, 3 (2014)). The review also found that changes the U.S. EPA proposed or implemented to IRIS constitute "substantial improvements in the IRIS process." (Id. at 3)

U.S. EPA's Science Advisory Board similarly recognized, in its September 2017 assessment, that "IRIS serves the needs of regions, states and tribes, who often lack the ability to perform their own chemical risk assessments." (U.S. EPA Science Advisory Board letter to U.S. EPA Administrator Scott Pruitt, Science Advisory Board comments on EPA's response to recommendations on the Integrated Risk Information System, 2 (2017)). The Science Advisory Board also commended the Agency for its significant improvements to IRIS, noting, "We are optimistic that the restructured IRIS program will strengthen the scientific foundations of risk assessment and protect the health and safety of the American public." (Id.)

As the National Academies and the Science Advisory Board observed, states rely on IRIS for health hazard information to which they otherwise may not have access. The IRIS Program covers a far greater number of chemicals than those evaluated by state agencies, and, consequently, serves as a critical source of toxicity assessments for chemicals evaluated in our state environmental risk assessments. For example, without IRIS, states would have less information to develop protective and scientifically rigorous toxicity assessments used in toxic waste site cleanups. In addition, the loss of access to IRIS's database of more than 140 pesticides assessments containing rare toxicity data for legacy pesticides used in agriculture for decades would compromise states' ability to review older compounds and close critical data gaps on human health effects.

Consolidating IRIS with regulatory programs could undercut the program's foundation in research, which provides the states with immense value. IRIS's chemical health hazard assessments are now separate from the regulatory decisions they inform, which often involve risk management considerations. Maintaining a distinction between the scientific basis for risk assessments and risk management decisions helps preserve the integrity of states' health and environmental protection programs. A transfer of IRIS or its functions to the Toxic Substances Control Act (TSCA) program, for example, would diminish that separation. It would also subsume IRIS's roughly 500 program chemicals, which U.S. EPA selects to assist regulatory programs in making decisions, in TSCA's broader regulation of 80,000 commonly used chemicals. Further, such a transfer would end the performance of pesticide assessments, which are excluded from TSCA's jurisdiction.

The IRIS Program provides critical chemical toxicity information that protects the health of states' residents and their environments. We urge Congress to retain the program's funding and keep personnel in its current location within U.S. EPA's Office of Research and Development to help states continue to protect human health and environmental quality.

Sincerely,

Todd Parfitt
Director, Wyoming Department of Environmental Quality
ECOS President

cc: Senate and House Appropriations Committee Leadership