American Composites Manufacturers Association
www.acmanet.org

The Honorable Winslow Sargeant, Ph.D.
Chief Counsel, Office of Advocacy
Small Business Administration
409 Third Street SW
Washington, DC 20024-3212

November 29, 2010

Dear Dr. Sargeant:

The Small Business Administration's (SBA's) Office of Advocacy performs an important role in protecting the viability of American small businesses. I am writing to you today because a mild heart attack that I suffered prevents me from traveling to meet with you in person at this time. As President of the American Composite Manufacturers Association (ACMA), I strongly urge your review and engagement in efforts to prevent the damage that the National Toxicology Program's (NTP's) review of styrene will have on small composite plastics companies.

In September, my colleagues met with Charles Maresca and explained how NTP's impending release of their *12th Report on Carcinogens* (*12th RoC*) contains a flawed assessment of styrene. The NTP assessment of the human data is based on a highly selective review and is contrary to the recent findings of the European Union and a blue ribbon panel composed of some of the world's leading epidemiologists. NTP's assessment of the animal data is based on a substitution of controls used to evaluate a National Cancer Institute study (contrary to NTP's own policy) and such results are now rendered completely outdated by just completed research using the most modern techniques that demonstrates that tumors found in styrene mouse studies are not relevant to humans.

The RoC assessment will lead to significant job losses and result in harm to smaller manufacturers through reduced competitiveness. Unnecessary health concerns from workers and neighbors will result in restrictions and higher costs for companies who use styrene in developing composite plastic products – all without any imaginable public health benefit. This will mean that products now manufactured in the U.S. will likely be manufactured abroad as making them here will become more difficult.

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I ask that you contact the Office of Information and Regulatory Affairs (OIRA) at the Office of Management and Budget and seek a meeting in order to conduct your own appraisal of the process flaws and biased scientific interpretations that have created this unfortunate situation. If left unaltered, this flawed review process will not only affect styrene users, but it will adversely affect other compounds used by small businesses in future reviews.

The Office of Advocacy intervened in 2000 when EPA attempted to implement unreasonable restrictions on styrene use by small businesses under the Clean Air Act. That SBA intervention played a decisive role in finally persuading EPA to eliminate the provisions most harmful to small businesses in our industry. I hope you will follow this precedent and engage the Department of Health and Human Services in an attempt to prevent this flawed review from impacting the jobs of up to 500,000 workers in the U.S, a very large proportion of whom work in our small businesses.

Respectfully,

Monty Felix
President, American Composites Manufacturers Association
CEO, Alaglas Pools