



March 6, 2014

By Electronic Mail

Mr. Christopher Zarba
Director, Science Advisory Board Office
U.S. Environmental Protection Agency
Mail Code 1400R
Ariel Rios Federal Building
1200 Pennsylvania Avenue, N.W.
Washington D.C. 20460

Re: Improving Public Involvement and Transparency of the IRIS Program

Dear Mr. Zarba:

The Office of Advocacy would like to thank you and Ken Olden, Director of the National Center for Environmental Assessment (NCEA), for your efforts to improve the public involvement and transparency of the IRIS (Integrated Risk Information System) program. By delaying the February 18th public meeting of the Chemical Assessment Advisory Committee (CAAC) to address ammonia and trimethyl benzene, EPA responded positively to the requests by small business trade associations to allow additional time to permit meaningful input by the public in the meeting. Advocacy very much appreciates the additional work that EPA and the peer reviewers have agreed to take on in order to ensure a high quality meeting to address the significant scientific issues.

We further commend EPA on its progress in implementing the very positive and robust enhanced IRIS procedures announced in July 2013. As part of those procedures, NCEA sets out additional opportunities for significant public input which should greatly improve the quality of the IRIS assessments, and satisfy the recommendations of the National Research Council (NRC).¹ Proper implementation of these procedures is critical to small business input.

Advocacy encourages the Science Advisory Board (SAB) chairs and the Designated Federal Officials (DFOs) to continue their efforts to achieve an effective dialogue between the public commenters and the CAAC peer reviewers. Such an effort would

¹ National Research Council, 2011, Review of the Environmental Protection Agency's Draft IRIS Assessment of Formaldehyde

implement the SAB plan to improve public involvement in SAB meetings (which include the IRIS CAAC meetings) that was the outcome of the SAB public meeting in the summer of 2011. At that meeting, several participants noted that the procedure limiting public comments to five minute presentations did not facilitate a true dialogue between the public and the peer reviewers. In response, the SAB has committed to additional steps to improve the interaction, and Advocacy commends this improvement.

Advocacy again thanks EPA for its commitment to a robust public process and the implementation of the July 2013 enhanced IRIS procedures, and look forward to future collaboration with the SAB and NCEA. If you have any comments or questions, please feel free to contact Kevin Bromberg of my staff (202-205-6964 or kevin.bromberg@sba.gov).

Sincerely,

/s/

Winslow Sargeant, Ph.D.
Chief Counsel for Advocacy

/s/

Kevin Bromberg
Assistant Chief Counsel for Environmental Policy
Office of Advocacy

cc:

Bob Perciasepe, Deputy Administrator, EPA
Ken Olden, Director, NCEA
Howard Shelanski, Administrator
Office of Information and Regulatory Affairs
Office of Management and Budget