

June 24, 2014

Drs. Kadeli, Kavlock, Olden, Vandenberg, and Cogliano
US EPA, National Center for Environmental Assessment
Research Triangle Park, North Carolina (Conveyed via e-mail)

Subject: Boycott of EPA's June 2014 IRIS inorganic arsenic and hexavalent chromium meeting

The US EPA's June 2014 meeting on arsenic and chromium health impacts is dominated by industry speakers. More than 80% of the speaking slots addressing arsenic and 97% of the slots dealing with hexavalent chromium are filled by speakers funded by companies with financial interests in the outcome of EPA's health hazard evaluations. Consulting firms and individuals funded by industry interests and the American Chemistry Council are the only speakers in some sessions and vastly outweigh the few "public interest" speakers overall (Attachment A lists speakers). This "public" meeting is extremely unbalanced and is on track to communicate a very skewed interpretation of the science integral to health assessments for arsenic and chromium.

Inorganic arsenic and hexavalent chromium cause cancer, genetic damage, birth defects and numerous other serious health problems. They contaminate drinking water and are common air pollutants. They pollute the land in many industrial and traffic-polluted residential areas. Environmental justice communities with higher background rates of health problems are more severely impacted by these and other environmental pollutants. Many workers are exposed to arsenic and chromium. All of these people and the public health community responsible for their protection require unbiased health hazard information. Extensive public exposure and potential for serious harm mandate that EPA obtain the best available scientific information.

The National Academy of Sciences panel reviewing the EPA's approach to chemical hazard evaluations urged EPA to improve their health evaluations through increased public input. In spite of that, industry participants dominated many recent EPA public input meetings and this meeting repeats that pattern. The EPA's management has again failed to adequately involve the public, despite claiming that they want to "level the playing field". There are many interested non-industry scientists. So it appears that in reality the goal was to minimize balance and avoid a diversity of opinions.

Although the EPA claims it did outreach to improve participation, the most obvious source of public input is health scientists who previously provided input. This letter's endorsers provided recent input to EPA on arsenic and have clear scientific competence (e.g., scientific publications on arsenic and chromium). Yet there was no outreach to these scientists by the EPA regarding participation in the meeting. At no time were we informed that there was an opportunity to provide more than the usual 5 minute statement at the end of the meeting, typically after most people have left the room. This is not a viable option for meaningful public input.

Honest communication regarding the serious issue of obtaining balance in science and policy is fundamental, but appears lacking in this case. Balanced scientific input is also necessary, yet has been studiously avoided. As a result of this we must ask whether the EPA is wasting the public funds by holding this meeting and more importantly, is betraying the public's trust.

As Dr. Ronald Melnick wrote: "The only appropriate title for this meeting is "The Industry Perspective on the Safety of Chromium and Arsenic - Two Known Human Carcinogens.""

We have no choice but to boycott this unbalanced meeting.

Kathleen Burns, Ph.D.
Director, Sciencecorps
Lexington, MA

James Huff, Ph.D.
Associate Director for Carcinogenesis at NIEHS (retired)
Raleigh-Durham, North Carolina

Ronald Melnick, Ph.D.
Cancer Researcher, NIEHS (retired)
Raleigh Durham, North Carolina

Michael Harbut, MD, MPH, FCCP
Clinical Professor, Wayne State University
Detroit, Michigan

Barbara Warren
Executive Director, Citizens Environmental Coalition
Albany, New York

Peter F. Infante, Dr.P.H., F.A.C.E.
Peter F. Infante Consulting
LLC Falls Church, VA 22046
(formerly, Director, Office of Standards Review, OSHA)

Copies provided to:

Dr. Joseph Graziano, NAS Committee Chair, Review of EPA's Arsenic Cancer Methodology
Dr. Linda Birnbaum, Director, NIEHS
Gina McCarthy Administrator US EPA
Avi Garbow, Esq. US EPA Office of General Counsel
Justina Fugh, Esq. US EPA Ethics Office
Jon Jacobs, Esq. Jacobs and Stotsky PLLC
Dr. Thomas Burke, Johns Hopkins University
Dr. Lauren Zeise, California Department of Environmental Protection
Dr. Michael Wilson, California Department of Industrial Relations

Dr. Jennifer Sass, NRDC
Dr. Urvashi Rangan, Consumer Union
Tony Corbo, Food and Water Watch
Dr. Kathleen Rest, Union of Concerned Scientists
Dr. Fiorella Belpoggi, Ramazzini Institute
Dr. Michael Jacobson, Center for Science in the Public Interest
Dr. Philip Landrigan, Mt. Sinai Medical Center, New York City
Angela Bradbery, Public Citizen
Michael Wright, United Steel Workers Union-Health and Safety
Peg Seminario, AFL-CIO-Health and Safety
Senator Edward Markey, Massachusetts
Senator Elizabeth Warren, Massachusetts
Senator Carl Schumer, New York
Senator Kirsten Gillibrand, New York
Senator Debbie Stabinow, Michigan
Senator Carl Levi, Michigan
Senator Barbara Boxer, California
Senator Bernie Sanders, Vermont
Representative John Persell, Minnesota
Daniel Pearson, US House of Representatives
Doug Pasternak, US House of Representatives

Attachment A. Meeting speakers and agenda

Industry-sponsored speakers are highlighted in yellow and non-industry speakers are in green. 37 of the 46 slots for arsenic and 40 of the 41 slots for hexavalent chromium are filled by those with financial interests in the outcome of EPA's evaluation. (Note Liz Geltman is an attorney.)

Source 6/24/2014: http://www.epa.gov/ncea/iris/publicmeeting/iris_bimonthly-jun2014/mtg_agenda.htm

IRIS Bimonthly Public Meeting Wednesday, June 25, 2014

10:00 am **Hexavalent Chromium**

	<p>Introduction</p> <ul style="list-style-type: none">Catherine Gibbons and Alan Sasso, EPA/IRIS Assessment Managers
	<p>Science issue 1: Cancer classification by inhalation</p>
	<p>Facilitated discussion of science issue with all attendees, including:</p> <ul style="list-style-type: none">Sean Hays, Summit ToxicologyChris Kirman, Summit Toxicology, on behalf of American Chemistry CouncilMark Harris, ToxStrategiesDeborah Proctor, ToxStrategiesMina Suh, ToxStrategies
	<p>Science issue 2: Noncancer hazards to be considered</p>
	<p>Facilitated discussion of science issue with all attendees, including:</p> <ul style="list-style-type: none">Sean Hays, Summit ToxicologyChris Kirman, Summit Toxicology, on behalf of American Chemistry CouncilTed Simon, Ted Simon LLCMark Harris, ToxStrategiesDeborah Proctor, ToxStrategiesMina Suh, ToxStrategiesChad Thompson, ToxStrategies
12:45 pm	<p>Science issue 3: Susceptibility of mice to gastrointestinal toxicity</p>
	<p>Facilitated discussion of science issue with all attendees, including:</p> <ul style="list-style-type: none">Sean Hays, Summit ToxicologyChris Kirman, Summit Toxicology, on behalf of American Chemistry CouncilMark Harris, ToxStrategiesDeborah Proctor, ToxStrategiesMina Suh, ToxStrategiesChad Thompson, ToxStrategiesElliot Gordon, Elliot Gordon Consulting LLC, on behalf of ToxStrategies
	<p>Science issue 4: Utility of subchronic histopathological data</p>
	<p>Facilitated discussion of science issue with all attendees, including:</p> <ul style="list-style-type: none">Sean Hays, Summit ToxicologyChris Kirman, Summit Toxicology, on behalf of American Chemistry CouncilMark Harris, ToxStrategiesDeborah Proctor, ToxStrategiesMina Suh, ToxStrategiesChad Thompson, ToxStrategiesElliot Gordon, Elliot Gordon Consulting LLC, on behalf of ToxStrategies

- Jeffrey Wolf, EPL Inc, on behalf of ToxStrategies

3:00 pm **Science issue 5: Database for reproductive and developmental effects**

Facilitated discussion of science issue with all attendees, including:

- Liz Geltman, City University of New York School of Public Health
- Sean Hays, Summit Toxicology
- Chris Kirman, Summit Toxicology
- Mark Harris, ToxStrategies
- Deborah Proctor, ToxStrategies
- Mina Suh, ToxStrategies

Science issue 6: Relation between anemia and oral tumors in rats

Facilitated discussion of science issue with all attendees, including:

- Sean Hays, Summit Toxicology
- Chris Kirman, Summit Toxicology, on behalf of American Chemistry Council
- Susan Borghoff, ToxStrategies
- Mark Harris, ToxStrategies
- Laurie Haws, ToxStrategies
- Deborah Proctor, ToxStrategies
- Mina Suh, ToxStrategies

Thursday, June 26, 2014

9:30 am **Inorganic Arsenic**

Introduction

- Reeder Sams, John Cowden, Janice Lee, EPA/IRIS Assessment Managers

Science issue 1: Application of NRC recommendations

Facilitated discussion of science issue with all attendees, including:

- Nancy Beck, American Chemistry Council (via telephone)
- Kimberly Wise, American Chemistry Council
- Jennifer McPartland, Environmental Defense Fund
- Joyce Tsuji, Exponent Inc, on behalf of Rio Tinto
- Barbara Beck, Gradient Corp
- Lorenz Rhomberg, Gradient Corp, on behalf of Arsenic Science Task Force
- Tracey Woodruff, University of California San Francisco
- Samuel Cohen, University of Nebraska Medical Center

Science issue 2: Risk-of-bias approach

Facilitated discussion of science issue with all attendees, including:

- Nancy Beck, American Chemistry Council (via telephone)
- Kimberly Wise, American Chemistry Council
- Chuck Elkins, Chuck Elkins & Associates
- Liz Geltman, City University of New York School of Public Health
- Jennifer McPartland, Environmental Defense Fund
- Joyce Tsuji, Exponent Inc, on behalf of Rio Tinto
- Barbara Beck, Gradient Corp
- Juleen Lam, Johns Hopkins University
- Patrice Sutton, University of California San Francisco (via telephone)
- Tracey Woodruff, University of California San Francisco (via telephone)
- Samuel Cohen, University of Nebraska Medical Center

1:15 pm **Science issue 3: Integrating results of epidemiologic studies**

Facilitated discussion of science issue with all attendees, including:

- Nancy Beck, American Chemistry Council (via telephone)
- Kimberly Wise, American Chemistry Council
- Joyce Tsuji, Exponent Inc, on behalf of Rio Tinto
- Barbara Beck, Gradient Corp
- Juleen Lam, Johns Hopkins University
- Tracey Woodruff, University of California San Francisco
- Samuel Cohen, University of Nebraska Medical Center

3:00 pm **Science issue 4: Concordance of effects between humans and animals**

Facilitated discussion of science issue with all attendees, including:

- Kimberly Wise, American Chemistry Council
- Joyce Tsuji, Exponent Inc, on behalf of Rio Tinto
- Barbara Beck, Gradient Corp
- Samuel Cohen, University of Nebraska Medical Center

Science issue 5: Upstream biological events for clinical disease endpoints

Facilitated discussion of science issue with all attendees, including:

- Joyce Tsuji, Exponent Inc, on behalf of Rio Tinto
- Barbara Beck, Gradient Corp
- Samuel Cohen, University of Nebraska Medical Center

Friday, June 27, 2014

9:30 am **Inorganic Arsenic (continued)**

Science issue 6: Mode-of-action and adverse outcome pathways

Facilitated discussion of science issue with all attendees, including:

- Nancy Beck, American Chemistry Council (via telephone)
- Kimberly Wise, American Chemistry Council
- Robinan Gentry, Environ Corp, on behalf of Electric Power Research Institute
- Jennifer McPartland, Environmental Defense Fund
- Joyce Tsuji, Exponent Inc, on behalf of Rio Tinto
- Barbara Beck, Gradient Corp
- Samuel Cohen, University of Nebraska Medical Center

Science issue 7: In-utero exposure leading to disease later in life

Facilitated discussion of science issue with all attendees, including:

- John DeSesso, Exponent Inc, on behalf of Arsenic Science Task Force
- Joyce Tsuji, Exponent Inc, on behalf of Rio Tinto
- Barbara Beck, Gradient Corp
- Samuel Cohen, University of Nebraska Medical Center

1:00 pm **Science issue 8 (new): Implications of nutritional factors on internal dose and response**

Facilitated discussion of science issue with all attendees, including:

- Joyce Tsuji, Exponent Inc, on behalf of Rio Tinto
- Barbara Beck, Gradient Corp