



North American Metals Council
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April 12, 2019

Via E-mail

Tina Bahadori, Sc.D.
Office of Research and Development
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460-0001

Re: Request for Meeting to Discuss Proposed Changes to Integrated Risk Information System Website to Better Inform Users

Dear Dr. Bahadori:

The North American Metals Council (NAMC)¹ respectfully requests an opportunity to meet with the U.S. Environmental Protection Agency's (EPA) Office of Research and Development (ORD) to discuss the proposal outlined below for a change to the current Integrated Risk Information System (IRIS) website that will highlight to users the age of an IRIS assessment report available on a subject chemical.

The identification of health hazards in IRIS assessments of existing chemicals plays a role both in supporting the missions of various EPA program offices and in toxicity determinations made by a multitude of stakeholders outside the Agency at the federal, state, local, and international levels. While IRIS values do not directly impose regulatory requirements, the conclusions reached in IRIS assessments are relied upon and used by other regulators to set compliance values and for other regulatory purposes. That being the case, it is imperative that users of IRIS values understand and appreciate that some posted assessments are quite old and may not reflect the most current science available.

Currently, the IRIS database includes several assessments that are ten or more years old. In such circumstances, we believe it would be appropriate for EPA to highlight clearly

¹ NAMC is an unincorporated, not-for-profit organization serving as a collective voice for North American metals producers and users. NAMC is a leader for the metals industry on science- and policy-based issues affecting metals.



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and effectively to the user how old the assessment is. To accomplish this, we suggest that when a user attempts to access an IRIS assessment that is more than ten years old, a “pop-up” notification appears on the screen informing the user of the age of the assessment. This action will ensure that parties relying on IRIS assessments will be fully aware of when the assessment was issued and can determine whether they should investigate whether additional data relevant for their needs are available.

NAMC understands that EPA is not in a position to update all past risk assessments on a timely basis, but also believes EPA has the responsibility to ensure that the public is aware that some assessments are quite old. We believe this “pop-up” notification proposal for IRIS assessments that are more than ten years old will achieve this objective.

We are aware of several other groups that support this concept and we would welcome an opportunity to meet with EPA to discuss the proposal’s merits. We will follow up with you to discuss scheduling such a meeting in **early May 2019**.

Thank you for your consideration of this request.

Sincerely,

Kathleen M. Roberts
NAMC Executive Director

cc: Mr. David D. Dunlap (via e-mail)
Jennifer Seed, Ph.D. (via e-mail)