

July 7, 2008

Dr. Ruth M. Lunn
NIEHS
P.O. Box 12233, MD EC-14
Research Triangle Park, NC 27709
lunn@niehs.nih.gov

RE: NMMA Comments on NTP Draft Background Document for Styrene for Report on Carcinogens

Dear Dr. Lunn:

The National Marine Manufacturers Association (NMMA) is submitting the attached comments on the National Toxicology Program (NTP) / Report on Carcinogen's (RoC) Draft Background Document for Styrene, responding to NTP's May 20 notice in the Federal Register (73 Federal Register, May 20, 2008, 29139).

NMMA is the nation's largest recreational marine industry association representing 1700 boat builders, engine manufacturers and marine accessory manufacturers. NMMA members collectively produce more than 80% of all recreational marine products made in the United States.

Styrene is a key component in the manufacturing of fiber glass recreational boats, and NMMA members have long been attentive to the regulatory treatment of the chemical. Our organization's members take great efforts to ensure the safety and health of our customers, workers, and communities, and we have supported industry efforts to develop independent, peer-reviewed science that accurately reflects the potential health effects of styrene.

Our understanding of the scientific data on styrene suggests that the styrene document created by NTP for consideration on July 21-22 by a Styrene Expert Panel does not begin to adequately reflect the true nature of the data on styrene, and seems predisposed to suggest that styrene could have the potential to cause cancer in humans.

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NMMA believes that significant amounts of data that show styrene is not a cancer health concern have been omitted, or have not been adequately covered in the assessment of the data for the Expert Panel's consideration. Because of the tremendous impact of a cancer listing of styrene in the Report on Carcinogens would have on the recreational boating industry, were it based on the currently deficient styrene document, we feel that significant improvements need to be made to this document before it can be considered an appropriate reference for the Expert Panel.

In particular, we feel that the characterization of the human epidemiology data, which reflects exposures and health effects outcomes of our own industry's workers, has not been sufficiently or appropriately considered. The attached comments on the collective weight-of-the-evidence analysis of the epidemiology data are intended to outline a more thorough and accurate evaluation of the complete epidemiology data set. We trust that the Expert Panel will give this information its strong consideration.

In closing, NMMA urges the Expert Panel members to move forward with a decision on whether styrene should be included in the Report on Carcinogens *only* after they have ensured that the data on styrene have been completely and accurately characterized in the NTP Styrene Background Document they have been charged to review, and upon which such a decision would be based. A selective or incomplete review of the styrene data cannot be considered an appropriate basis on which to make a decision that could have such a major impact on our industry.

Sincerely,

John McKnight
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Attachment:

Comments on the Weight-of-Evidence Analysis of Epidemiology Data in the May 22, 2008 NTP Report on Carcinogens Draft Background Document for Styrene

cc: Boat Manufacturers Division Board of Directors