

June 18, 2008

Dr. Samuel H. Wilson
Acting Director
National Institute of Environmental Health Sciences
and National Toxicology Program
P.O. Box 12233
Research Triangle Park, NC 27709 Dear Dr. Wilson:

Dear Dr. Wilson:

The National Marine Manufacturers Association (NMMA) is requesting that you postpone the meeting of the National Toxicology Program's (NTP) *Report on Carcinogens* Expert Panel on styrene scheduled for July 21-22, 2008.

The NMMA is the nation's largest recreational marine manufacturing trade association with over 1500 members. Our members' manufacturer every conceivable marine related product from anchors to zinc, none of which are needed if we can't safely manufacture fiberglass boats.

Boat builders have been using styrene monomer to build fiberglass boats for over fifty years. In recent years, boat builders have begun using new application technology and lower styrene resins as a way to reduce emissions into the environment and reduce worker exposure. Most boat builders are small family businesses where the workers are considered part of the family and the owners spend a considerable amount of time on the factory floor.

Thus there is probably no greater incentive in any industry for the owners to know if the chemical that they and their family are exposed to is a carcinogen. At the same time there is probably no greater threat to recreational boating than for the NTP expert panel to make a hasty determination of carcinogenicity without fully considering the latest information provided by the Styrene Information and Research Center (SIRC).

NMMA and its boat builder members who are exposed to styrene every day firmly believe that it is not a human carcinogen. We have worked closely with SIRC for many years and have followed the mouse lung Mode of Action information and the epidemiology studies. Although boat builders are not scientists, we are very worried that a two day NTP expert panel could make a decision that incorrectly identifies that the chemical that recreational boat builders use every day could cause them to get cancer.

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Thus, NMMA supports the SIRC call for a postponement of the Expert Panel so that a more complete, accurate and up-to-date review draft can be developed before the Expert Panel meets. NMMA also supports the idea of a Blue Ribbon Panel on styrene epidemiology as an input to the re-write of the styrene review draft Thank you for your consideration. We look forward to working with your organization in any way we may be of assistance.

Sincerely,

John McKnight, Director
Environmental & Safety Compliance