

"Michael H. Levin" < Mhlevin@leonardfrost.com > 06/06/2002 05:26:42 PM

Record Type: Record

To: John Morrall@EOP

cc:

Subject: FW: formaldehyde IRIS review

FYI. Understand Graham already has this or something related to it under consideration, but thought you'd appreciate it. We talked about it some months ago on a dog walk. MHL

----Original Message-----

From: Walsh, Anne [mailto:AWalsh@KSLAW.coml

Sent: Thursday, June 06, 2002 2:47 PM

To: Ott, Gerald Ph.D.; Mieure, James P. Ph.D.; Lowenkron, Laurence H.; Gruenwald, Mark C.I.H.; Bogdanffy, Matthew **S.** Ph.D.; Tikonoff, Matthew; Deskin, Randy Ph.D., DABT; Holm, Stewart E.; Cascieri, Tito C. Ph.D., D.A.B.T.; 'Cooper, Josephine S.'; 'Ughetta, Valerie'; 'Festa, John L. Ph.D.'; 'Landry, Brock R. Esq.'; 'jbradfield@cpamail.org';

'tjulia@cpamail.org'; 'Lynn, John'; 'Levin, Michael Esq.'; 'debra phillipps@americanchemistry.com'; Tim Hunt (E-mail)

Cc: Rhyne, Kathy

Subject: FW: formaldehyde IRIS review

On behalf of FETEG, we sent the attached e-mail and letter to EPA urging EPA to expedite the IRIS review of formaldehyde.

Kathy Rhyne Anne Walsh

King & Spalding 1730 Pennsylvania Avenue, NW Washington, DC 20006 202.661.7889 202.626.3737 (fax) awalsh@kslaw.com

> -----Original Message-----> From: Rhyne, Kathy

> Sent: Thursday, June 06, 2002 2:42 PM

> To: 'gilman.paul@epa.gov'; 'holmstead.jeff@epa.gov';

> 'shaver.sally@epa.gov'

> Cc: 'vu.vanessa@epa.gov'; 'mazza.carl@epa.gov';

> 'John_Graham@omb.eop.gov'

> Subject: formaldehyde IRIS review

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> Ladies and Gentlemen:
> On behalf of the Formaldehyde Epidemiology, Toxicology and Environmental
> Group, Inc., I am attaching a letter urging that EPA expedite its update
> of the formaldehyde IRIS assessment.
> EPA's current IRIS value for formaldehyde's potential carcinogenicity was
> established in 1987. Since then, an enormous amount of research has
> occurred. Organizations including OECD, WHO, Health Canada and the German
> MAK Commission have found that formaldehyde is unlikely to be carcinogenic
> at low doses. CIIT, in a report peer-reviewed under the auspices of EPA
> and Health Canada, developed a state-of-the-art, biologically-based model
> for quantitative risk assessment. At environmentally relevant doses, the
> best available estimates of risk are orders of magnitude below the current
> IRIS value. EPA's SAB web site lists the review of the formaldehyde risk
> assessment as a high priority.
>
> Continued use of the 1987 value in the large number of ongoing regulatory
> proceedings that address formaldehyde will result in a serious
> misallocation of resources. We urge EPA to expeditiously complete its
> update of the formaldehyde risk assessment.
> Further information is provided in the attached letter. Relevant
> materials are in the IRIS docket, but please let us know if we can supply
> any additional information. We appreciate your consideration.
>
> <<hcho.doc>>
>
> Respectfully submitted,
> Katherine L. Rhyne
> King & Spalding
> 1730 Pennsylvania Ave. N.W.
> Suite 1100
> Washington, D.C. 20006-4706
> 202-626-3743
> fax 202-626-3737
> krhyne@kslaw.com
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