



January 11, 2021

Mr. Michael S. Regan
Administrator
U.S. Environmental Protection Agency
William Jefferson Clinton Building
1200 Pennsylvania, N.W.
Washington, D.C. 20460

Submitted via email and mail

RE: NASEM Review of EPA's 2021 Draft Formaldehyde Assessment

Dear Administrator Regan,

The undersigned, including members of the American Chemistry Council ("ACC")¹ Formaldehyde Panel² ("the Panel") and other stakeholders, request that prior to release to the public and the National Academies of Science, Math, Engineering and Medicine (NASEM), the Environmental Protection Agency (EPA) ensure that the 2021 draft formaldehyde Integrated Risk Information System (IRIS) assessment:

1. Has adequately addressed the critical deficiencies and recommendations identified in the NASEM 2011 Review of the 2010 IRIS assessment,³ the IRIS performance recommendations contained in the 2014 NASEM review of the IRIS program,⁴ and the recently published 2021 NASEM review of the ORD handbook;⁵ and
2. Uses the best available science, a weight of the evidence and mode of action approach and incorporates the most recent scientific studies, all as strongly recommended by NASEM review in 2011.

Formaldehyde is one of the most studied, and regulated, chemical substances in commerce today. Since the early 1980s, this substance has been rigorously studied to provide scientific information to support protective regulatory safe exposure levels for formaldehyde. Given formaldehyde's wide use, extensive product stewardship efforts have been implemented. The Panel has actively supported peer reviewed and published scientific research to improve understanding and characterization of potential human health risks associated with formaldehyde and address the scientific gaps identified in the 2011 NASEM review. This scientific evidence, supported by the Foundation for Chemistry Research & Initiatives⁶ and members of the Panel, is publicly available and linked on the Panel's [Science & Research website](#).

Thank you for your consideration of the ACC Formaldehyde Panel and other stakeholders' request to ensure that the pending draft formaldehyde IRIS assessment reflects the best available science before it



is released and that the NASEM review verifies the EPA has adequately addressed its previous recommendations.

Regards,

American Chemistry Council



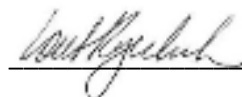
Chris Jahn
President and CEO

American Forest & Paper Association



Stewart E. Holm
Chief Scientist

Celanese Corporation



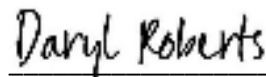
Lori Ryerkerk
Chairman, President and CEO

Composite Panel Association



Andrew T. O'Hare
President

DuPont Specialty Products USA, LLC



Daryl Roberts
Chief Operations and Engineering Officer

Foremark Performance Chemicals




Randy Owens
President and CEO

Hexion Inc.



Craig Rogerson
Chairman, President and CEO

Kitchen Cabinet Manufacturers Association



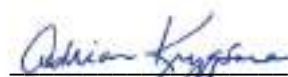
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Cc:

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Chris Frey, Deputy Assistant Administrator for Science Policy, Office of Research and Development

Tim Watkins, Acting Director, Center for Public Health and Environmental Assessment, Office of Research and Development

Kris Thayer, Director, Chemical & Pollutant Assessment Division, Office of Research and Development

¹ The American Chemistry Council (ACC) represents the leading companies engaged in the business of chemistry. ACC members apply the science of chemistry to make innovative products and services that make people's lives better, healthier and safer. ACC is committed to improved environmental, health and safety performance through Responsible Care[®]; common sense advocacy designed to address major public policy issues; and health and environmental research and product testing. The business of chemistry is a \$486 billion enterprise and a key element of the nation's economy. It is among the largest exporters in the nation, accounting for ten percent of all U.S. goods exports. Chemistry companies are among the largest investors in research and development. Safety and security have always been primary concerns of ACC members, and they have intensified their efforts, working closely with government agencies to improve security and to defend against any threat to the nation's critical infrastructure.

² The ACC Formaldehyde Panel represents producers, suppliers and users of formaldehyde and formaldehyde products, as well as trade associations representing key formaldehyde applications

³ [Review of EPA's Draft IRIS Assessment of Formaldehyde | National Academies](#)

⁴ [Summary | Review of EPA's Integrated Risk Information System \(IRIS\) Process | The National Academies Press \(nap.edu\)](#)

⁵ [Review of EPA's IRIS Assessment Handbook | National Academies](#)

⁶ The Foundation for Chemistry Research & Initiatives (Foundation) is a 501(c)(3) tax-exempt organization established by the American Chemistry Council (ACC).

