



March 9, 2010

Honorable James P. Moran
2239 Rayburn Office Building
U.S. House of Representatives
Washington, DC 20515

Dear Congressman Moran,

The United Steel, Paper and Forestry, Rubber, Manufacturing, Energy, Allied Industrial and Service Workers International Union, AFL-CIO (USW) strongly supports the Endocrine Disruption Prevention Act of 2009, H.R. 4190. We represent 1.2 million active members and retirees, many of whom have been exposed to a myriad of toxic chemicals in their workplaces, including chemicals linked to endocrine disruption.

Many chemicals of concern, some of which are known or suspected endocrine disrupting chemicals (EDCs), are now ubiquitous in the environment. No one is exempt from exposure since they contaminate the food we eat, the air we breathe and the water we drink, and they are intentionally incorporated in a multitude of personal care and consumer products used in our homes, schools, workplaces and hospitals.

However, USW members and their families no doubt encounter even greater exposures than the general population since they are in contact with dangerous chemicals throughout the entire life cycle of those chemicals. As chemical workers, we make them. As workers throughout industry, we use them. We bring them home on our clothes, and in our bodies. For pregnant or nursing mothers—or for that matter, every working woman of childbearing age with ovaries, every day is “bring your child to work day” since females are born with all the eggs they will ever have.

While toxicological information is sorely lacking for the vast majority of chemicals used in commerce, we know that too many are equal opportunity poisons that have no gender, racial, or economic barriers. It is clear that there is a crucial need for unbiased endocrine disruption research. This need is justified by the fact that the incidence rate of endocrine-related disorders has steadily and rapidly increased in the last two decades. Research is needed to:

- a.) better understand how chemicals impact the endocrine system;
- b.) develop assays to identify EDCs; and
- c.) determine the safety of chemicals linked to endocrine disruption.

H.R. 4190 will move us toward valid scientific studies necessary to assist regulatory agencies in determining how to assess and manage the risks posed by EDCs, including determining

occupational exposure limits. Currently, there are 51,889,900 organic and inorganic substances registered with the Chemical Abstract Service, with 38,398,764 available for commercial use. (See <http://www.cas.org/cgi-bin/cas/regreport.pl>)

Despite the astounding number of chemicals used commercially, OSHA has established Permissible Exposure Limits (PELs) only for approximately 500 chemicals; and lack of scientific data, including risk assessments, has interfered with the establishment of more protective worker exposure limits. In fact, in July of 1992, after several legal challenges, the 11th Circuit Court of Appeals vacated 212 PELs that OSHA had upgraded in 1989 to better protect workers, moving them back to PELs established in 1971.

In other words, for many chemicals known to cause harm, there are no legally enforceable workplace exposure limits (PELs). This is true not just for chemicals linked to cancer or other serious diseases, it is also the case for chemicals known or suspected to be endocrine disruptors. **For example, there are no legally enforceable workplace exposure limits (PELs) for Dioxin, Hexachlorobenzene (HCB), Bisphenol A (BPA) or Atrazine, all of which are well-recognized as having endocrine disrupting properties.**

The time for action on EDCs is long-overdue. Accurate and timely scientific information on these chemicals is necessary to develop measures to protect public, worker and environmental health. We applaud you for introducing H.R. 4190 and recognize and appreciate those who have joined you in co-sponsoring this important legislative initiative. Please know that we stand ready to support you in your efforts.

Sincerely,



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c: Representative Nita Lowey
Representative George Miller
Representative Betty McCollum
Representative Raul Grijalva
Representative James P. McGovern
Representative Maurice Hinchey
Representative Patrick Kennedy
Representative Louise Slaughter
Representative Janice Schakowsky