



AmericanCoatings ASSOCIATIONSM

April 29, 2015

Monet Vela
Office of Environmental Health Hazard Assessment
P. O. Box 4010
Sacramento, California 95812-4010
E-mail: P65Public.Comments@oehha.ca.gov

Re: Notice of Intent to List: Styrene

Dear Ms. Vela:

The American Coatings Association (“ACA” or “Association”) supports and reiterates the comments from the Styrene Information Research Center (SIRC) submitted to the California Environmental Protection Agency, Office of Environmental Health Hazard Assessment (“OEHHA” or “Agency”) on the notice of intent to list Styrene¹ as known to the state of California to cause cancer under the Safe Drinking Water and Toxic Enforcement Act of 1986 (“Prop 65”).² This action is being proposed under the authoritative bodies mechanism. ACA appreciates the opportunity to comment on the proposed notice. ACA believes there is not sufficient evidence for listing styrene under the authoritative bodies mechanism for the reasons outlined in SIRC’s comments—particularly because the National Toxicology Program (NTP) listing concluded that the evidence in humans was limited, and new human studies demonstrate that the human evidence is inadequate, not satisfying the Prop 65 requirement of sufficient evidence in humans. ACA requests that OEHHA withdraw its Notice of Intent to List styrene.

ACA is a voluntary, nonprofit trade association representing approximately 250 paints, coatings, adhesives, sealants, and caulks manufacturers, raw materials suppliers to the industry, and product distributors. The manufacture, sale, and distribution of paints and coatings are a \$20 billion dollar industry in the United States. ACA’s membership represents over 90% of the total domestic production of paints and coatings in the United States. The state of California currently represents approximately 18% of our domestic coatings market. ACA represents 15 paint and coatings manufacturers with locations in California. The paint and coatings industry, including manufacturers and retailers, employs over 31,000 workers in California.

For additional information or questions, please contact Javaneh Nekoomaram at (202) 719-3715 or at jnekomaram@paint.org or Stephen Wieroniey at (202) 719-3687 or at swieroniey@paint.org.

Respectfully Submitted,

Stephen Wieroniey
Manager, Occupational Health and Product Safety

Javaneh Nekoomaram, Esq.
Counsel, Government Affairs

¹ Proposed Regulation. “Notice of Intent to List Styrene by the Labor Code Mechanism.”
http://www.oehha.org/prop65/CRNR_notices/admin_listing/intent_to_list/noilstyrene2015.html.

² Health and Safety Code section 25249.5 *et seq.*