

Statement of Bonnie Webster, Monroe Industries

Science and Small Business Joint Hearing on the *Report on Carcinogens*

April 25, 2012

1. Thank you Chairman Broun, Chairwoman Ellmers, Ranking Member Tonko, and Ranking Member Richmond for the opportunity to testify before you today. My name is Bonnie Webster and I am the Vice President of Monroe Industries in Avon, NY. My husband John is here with me today and together we own the company. We have seven employees but often hire 2-3 more seasonally to meet demand. We are a cast polymer company and use styrene-based resin to manufacture high-end custom showers and vanity tops.
2. We are a small operation but we go to great lengths to reach the highest level of safety. In 1999 we built a new facility away from any residential areas. Because styrene, like any chemical, has the potential to be harmful when misused we ensure that every employee uses a respirator and other safety equipment. Unlike larger companies we do not have the ability to employ full-time occupational safety staff. However, we bring in consultants annually to address OSHA matters to ensure that even with small resources we are compliant and safe.
3. Our company works hard to lessen the environmental impact of our production. We have created Robal Glass a product that uses half the amount of resin. Robal Glass uses a bio based resin and recycled glass for which we won an EPA Environmental Quality Award. Our products have a lifecycle of well over 20 years and are designed to last the duration of the home.
4. Despite our hard work to be at the cutting edge of the composites industry we are very concerned that the listing of styrene in the 12th *Report on Carcinogens* could make it very difficult for us to stay in business.
5. Currently there is only one company that will insure us. Should we be dropped by that company, like the many other composites companies whose coverage has been terminated

by their long-time carriers, it will be impossible for us to continue to make an affordable product. Today's mentality when it comes to liability law suits is "Who can I sue next?" We cannot afford to be next and remain in business. We are also very concerned about our worker's compensation insurance, as many composites companies have been under increased scrutiny since the inclusion of styrene in the 12th *RoC*. Some have been threatened to have their coverage revoked. If the poor science that informed the *RoC* listing begins to inform EPA or OSHA regulation our concerns will worsen.

6. Our worries are not unique only to Monroe Industries. Many state air pollution regulatory programs will look at the *RoC* listing and set styrene ground-level exposure limits based on a presumption of carcinogenicity, and this will make it impossible for composite manufacturers in these states to get or renew operating permits. Most composite manufacturers are required under the Clean Air Act to post a public notice every 5 years when they renew their operating permits. In many cases, plant neighbors will find a reference to the *RoC* listing on the Internet and will incorrectly but understandably believe that the permits should not be renewed.
7. In light of the uncertainty presented by the styrene listing in the *RoC* we have no plans to expand our production or increase our number of employees. We hope we will be able to maintain the business that we have now. Compared to many other companies in the cast polymer subset of the composites industry we are in a better position than most because our products are totally customized and, therefore, very difficult to import. The current environment has made it nearly impossible for many high production cast polymer fabricators to compete. Surrounding countries do not have the regulations and additional costs that we have here. Unlike larger composites manufacturers, cast polymer fabricators do not have the luxury, if you can call it that, of moving production offshore. If this trend continues we will have no choice but to liquidate our companies.
8. There is a significant environmental benefit to using our engineered composite products over natural stone products that should be considered. Granite, for example, is mined in South America and, often, shipped to China to be polished before being shipped to the United States for customization. The environmental impact of the transportation aspect of

that alone is considerable. The fact that our engineered surfaces are fully manufacturable in the United States in addition to being partially constituted of recycled components makes them a very green product.

9. The *RoC* has hidden in the shadows, pretending only to be harmless input to public health agencies. It has been largely unsupervised by the Congress, unreachable by the courts, and not even carefully supervised by the senior officials in their respective agencies. Yet, its actions have every bit as much an impact as regulations, which in contrast are subject to the Administrative Procedure Act, are held accountable for responding to public comments, are scrutinized by the Congress, and can be challenged appropriately in Court.
10. Our company, like many in our industry, is a very tight knit entity. I would never want to see any of our employees hurt and if I believed that there was any genuine threat of styrene causing cancer then I would not be here today. The fact is that flawed science has led to a flawed conclusion that has fallen on the backs of small business. The viability of our entire industry is at risk, one that employs over 250,000 people in the United States – the vast majority of which in small businesses.
11. Our industry is asking that Congress reform the way the federal government analyzes the risk of chemicals to make it a more transparent, inclusive, and scientific process. Please consider these reforms that will ensure that federal programs like the *Report on Carcinogens* lead to valuable assessments that help, rather than harm, American business and the American worker.
12. Thank you very much for your time.