

Statement of John Barker, Strongwell Corporation

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 John Barker. I am the Corporate Manager of Environmental Affairs at Strongwell Corporation. I would also like to introduce my colleague David Ring from Strongwell who is here with me today. Strongwell employs 465 people with facilities in Bristol, Virginia, Abingdon, Virginia, and Chatfield, Minnesota. Our primary raw materials are styrene, resins and reinforcements which we use to make many products including ballistic panels, having shipped over 150,000 to protect American soldiers in Iraq and Afghanistan. We also manufacture bridge beams and platforms being used increasingly to reduce the lifecycle cost and improve the sustainability of infrastructure.
2. Like any chemical such as styrene it is critical to follow safety guidelines. At Strongwell, we pride ourselves in our proactive safety programs. Each facility has a plant safety committee and an excellent safety record. Our employees are trained periodically on each chemical that we use with all employees being retrained at least annually. We ensure that all employees have both the protection equipment and knowledge they need to safely use the chemicals that are a part of our production.
3. By nearly every account, when following the proper safety guidelines styrene is a safe chemical. Many studies from both the private and public sectors alike speak to the absence of a threat of cancer when using styrene. Regardless, the National Toxicology Program listed styrene as a “reasonably anticipated carcinogen” in the 12th *Report on Carcinogens*.

4. The listing of styrene in the *RoC* is of significant concern to Strongwell and the composites industry in general. For one thing, the idea of “reasonably anticipated” has caused great confusion for our employees, their families, and members of the community. We have taken a proactive approach of informing employees about the ruling and other studies about styrene toxicity. We have gone over this matter in-depth with the city councils of Bristol, Virginia and Bristol, Tennessee and have taken community leaders on tours of our facilities to fully explain our safety practices. We have spent millions of dollars on emission reductions and have made a push toward direct injection molding which lessens the exposure of workers to styrene.
5. Dr. Bus has explained the scientific problems behind the listing of styrene in the *Report on Carcinogens*. Let me tell you about the problems it is causing to business:
 - a. As a company, Strongwell has gone to great lengths for many years to have a strong and positive relationship with our community. For example, we assist the local fire department with their annual training and provide assistance in maintaining their equipment. Lately, we have been receiving anonymous phone calls saying things like “You do know that styrene causes cancer, don’t you.” This tells us that people believe the flawed science used in the assessment of styrene and it makes it difficult to maintain an open and fair relationship with the community.
 - b. A Google search of “styrene toxic tort” returns a list of many law firms that now claim to specialize in “styrene injury suits”; styrene was not a business opportunity for these law firms a year ago. Because we self-insure, Strongwell has had to place a significant amount of money into reserves to protect ourselves against potential liability lawsuits. The money that we must reserve for liability purposes could be used for investment and job expansion if it weren’t for this styrene listing.

6. As I mentioned previously, Strongwell manufactures many important products and these are just a small example of the thousands of applications of composite products. Styrene is an essential chemical component of this manufacturing for which there is no reasonable replacement. Resins based on other chemicals do exist, but are far more expensive and not nearly as well understood in terms of health effects on humans.
7. Likewise, we are very concerned about the potential regulatory burden that could be placed on our operations should the *RoC* listing form the basis of regulatory changes. Changes to the regulations already in effect by OSHA and EPA could cause the cost of compliance to increase substantially. Further, focusing on a matter that should be of no concern will make it harder for employees to give full attention to the safety issues that are important.
8. Because there is no legitimate substitute for styrene and because the costs of liability and compliance could increase astronomically, there is a concern that the federal treatment of styrene could drive composites product jobs off-shore. By the way, this is not just a concern for Strongwell, but also for the entire industry that employs over 250,000 people.
9. Our competitors in Mexico, China, Canada, South America and Japan do not face the same regulatory barriers. Even Denmark, and other countries in the EU, welcome composites manufacturing, because they recently looked carefully at the styrene data and determined that it's not a carcinogen.
10. Our industry association is proposing modest commonsense reforms, which could be enacted legislatively or administratively, and which would dramatically improve the scientific quality *RoC*. We feel our suggested reforms could also serve as a model for improving the quality of Federal science in other areas. Without these changes and without a reexamination of the listing of styrene our entire industry, one on the cutting edge of innovation, is in jeopardy.

11. While I am speaking with you today a group of 50 second graders from a local elementary school are touring the Strongwell plant in Bristol, Virginia –including the daughters of our two top executives. If we believed that styrene posed any threat of cancer we would never allow children from our community, much less our families, to be exposed.
12. Thank you very much for the opportunity to provide these comments.