

As Prepared for Delivery
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**Oral Testimony of Mr. Marshall Moore
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**Before the
U.S. Senate Committee on Environment and Public Works**

**“Oversight of EPA Authorities and Actions to Control Exposures to Toxic Chemicals”
July 24, 2012**

Flame retardants have received a lot of attention recently – some of which is inaccurate and misleading – so I want to be very clear: Chemtura stands by its products.

And we have acted proactively with EPA and others to lead our industry in the introduction of greener alternatives because of a corporate commitment to continuous improvement.

That’s why we’re participating fully in this hearing.

I will emphasize three important points:

1. Flame retardants are effective in reducing the flammability of synthetic materials;
2. EPA has conducted an extensive assessment of new flame retardants to ensure they are safe for use; and
3. Chemtura acts proactively to develop new flame retardant products with improved environmental profiles

Our scientists are working every day to find better, safer, and greener ways to mitigate the age-old risk of fire. By adding flame retardants to polyurethane foam – which is highly flammable when left untreated – manufacturers have been able to comply with the nation’s strictest furniture flammability standard, California Technical Bulletin 117. For over three decades, flame retardants have enabled manufacturers to meet this standard by reducing the flammability of their products.

The introduction of this standard coincided with a dramatic decrease in the number and severity of house fires, according to data compiled by the National Fire Protection Association. A number of labs have replicated these results, most recently at the Southwest Research Institute. In a study funded by the National Institute of Justice, Dr. Matthew Blais tested foam treated with flame retardants to meet the California standard. He concluded, quote: *“the use of CA TB 117 foam increases the fire safety of home furnishings by delaying the onset of free burning conditions and reducing the total energy released by the event.”*

Scientific data show the relative risk associated with our flame retardants is extremely low, and is far outweighed by the societal benefits of this advancement that reduces the number and severity of fires.

From an environmental perspective, EPA required rigorous review of TBB, a component of Firemaster 550. This product was designed to provide the same or better flame retarding properties in furniture foam as earlier products, but with an improved environmental profile.

Chemtura submitted 15 studies to EPA during the assessment of TBB. These included studies designed to assess the potential exposure of consumers, and the persistence and potential for bioaccumulation. Based on these studies our scientists concluded — and EPA agreed — TBB is less persistent and less likely to bioaccumulate than the product it replaced.

In the years that followed, Chemtura conducted additional environmental fate and toxicity studies. They indicated the levels at which observable effects would be expected are orders of magnitude higher than the predicted exposure levels. That is, risk is minimal.

The product was subject to government restrictions until EPA received those studies – a process that took more than 13 years.

Chemtura will be submitting 17 additional studies – all conducted for registrations in other regions – as part of EPA's TSCA Work Plan Chemicals program. We welcome the opportunity to work with regulators to conduct a fresh, objective, and scientific review of this data as well as studies conducted by academic researchers. Based on our experience, the evaluation of new chemical substances under TSCA has been effective and thorough.

Yet, we believe TSCA can be modernized to be more efficient, to use current scientific technologies, and to reflect our improved understanding of how chemicals interact with the human body and the environment. You have our commitment to help in this effort.

In conclusion: Chemtura has fully complied with chemical management regulations, while also leading the industry in the introduction of greener alternatives. We have shown our commitment to continuous improvement by voluntarily replacing older products with newer options that are better, safer, and greener.

Everyone in this room wants the same thing: reduced risk of fire, greener chemistry that results in efficient products with reduced environmental impact, and a regulatory process that promotes innovation.

Chemtura is proud to have led the industry in introducing products that meet the most rigorous fire safety standards while protecting human health and the environment.

Thank you once again for the opportunity to appear before you today.