

**SI Group Statement for
Safer Detergents Stewardship Initiative (SDSI)
US EPA Design for the Environment (DfE)
Public Meeting
June 12, 2006**

My name is Greg Beyer, Executive Director of EHS for SI Group, formerly Schenectady International.

SI Group is a 100 year old privately owned company based in Schenectady, New York. We employ approximately 600 people in NY, TX and TN. We are proud to be a Responsible Care[®] company committed to providing safe products and operating safe and environmentally responsible production facilities. We are also proud to be a producer of nonylphenol (NP).

Today we are here to voice our disagreement with the proposed SDSI program because we believe that the science shows our product may be used in a safe manner, without harm to the environment.

NP and nonylphenol ethoxylates (NPEs) have been the subject of a great deal of study. Extensive research has been conducted to understand these materials and their effects on the environment - perhaps more so than for any other surfactant.

Much opinion about these materials was formed 10 and 15 years ago. Those early studies raised concern over the possible endocrine effects of NP in the environment. Since that time, the science used to evaluate these materials has been continuously improved and refined. Many of the early studies have been repeated using improving methodologies and reaching different conclusions. It has since been established that the NPEs used in commercial products are not estrogenic and the latest science related to NP has been considered in the development of EPA's recently finalized Water Quality Criteria (WQC).

EPA concluded in that WQC document that while NP has very weak estrogenic activity "*the ability of nonylphenol to induce estrogenic effects has seldom been reported at concentrations below the freshwater Final Chronic Value of 6.5965 µg/L*".¹

EPA has taken all of the available information and carefully set the recently published WQC. We do not contest these limits. In fact we support them.

¹ EPA Aquatic Life Ambient Water Quality Criteria-Nonylphenol - Final, EPA-822-R-05-005, December 2005
www.epa.gov/waterscience/criteria/nonylphenol/

The Alkylphenols & Ethoxylates Research Council (APERC) recently completed a comprehensive study of available measurements of NP in the surface waters in the United States over the past 15 years. The results, which were recently provided to EPA, indicate that with the exception of 6 samples taken at 4 locations over the course of 15 years, level of NP do not exceed the EPA's chronic WQC value. It is also important to note that all 4 of those locations were otherwise impacted by pollution.

As a Responsible Care[®] company, SI Group has supported, through APERC, a study of the treatability of NP and NPEs in wastewater treatment plants. Guidelines for the effective treatment of NP and NPEs were developed and findings indicate that NP and NPEs do not require extraordinary treatment.

NP and NPEs are treatable, biodegradable and they are not present in US waters at levels of concern.

The SDSI initiative does not promote safer detergents. Rather, it merely calls for the deselection of one compound. Based on the available science, this action is unjustified.

We urge EPA to abandon this effort.