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March 26, 2010

Mr. James Alwood
Environmental Protection Agency
Ariel Rios Building
1200 Pennsylvania Avenue, NW
Room 4133J, Mail Code 7405M
Washington, DC 20460

Dear Jim:

I wanted to let you know about a new group of nanotechnology companies that Porter Wright and Intertox has pulled together to focus on potential environmental, health, and safety issues related to the commercialization of carbon nanomaterials. Our group has named itself the NanoSafety Consortium for Carbon (NCC), and you can learn more about what we are doing on our website -- www.nanosafetyconsortium.com.

While NCC has a very broad focus, our initial objective is to reach out to EPA to pursue the potential development of a mutually agreeable testing regime for a suite of representative carbon nanomaterials to fulfill the toxicity testing requirements of any TSCA consent order applicable to our members' existing carbon nanomaterials.

As part of any overall representative testing regime, we would also like to develop a mutually agreeable approach which allows a reasonable range of modification to members' products without requiring renewed comprehensive toxicity testing.

Additionally, at the appropriate juncture, we would like to provide your office with our perspective on the scope of any data-call-ins or testing rules which might be issued for carbon nanomaterials under Sections 4 or 8 of TSCA.

We know that these are very difficult and complicated issues, but we believe they are important for NCC to pursue in a unified fashion in order to address public health and safety issues and, at the same time, provide a predictable path for the responsible development of our members' products. Our hope is that EPA will agree to work with NCC to achieve towards these goals.

If you are available, I would like to set up a meeting with you to discuss the consortium in person. Please let me know a convenient date and time for a meeting at or near your office.

Finally, for your consideration, NCC is comprised of the following initial participants: Angstrom Materials, Inc.; Applied Sciences, Inc.; CheapTubes; Continental Carbon Nanotechnologies, Inc.; Eikos, Nano-C; NanoLab; Nanoshel; Pyrograf Products; SouthWest NanoTechnologies; Unidym; and XG Sciences. Additionally, the following individuals have agreed to serve on NCC's Advisory Board: Chuck Geraci (NIOSH); Vince Castranova (NIOSH);

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Gunter Oberdorster (University of Rochester). We anticipate that our membership and advisory board will continue to grow over the coming months.

We all look forward to working with you and others at EPA on these important issues.

Very truly yours,

DRAFT

John C. Monica, Jr.

JCM:alm