



Agency for Toxic Substances
and Disease Registry
Atlanta GA 30333

June 20, 2006

Tracey Easthope, M.P.H.
Director, Environmental Health Project
Ecology Center
117 N. Division
Ann Arbor, Michigan 48104

Dear Ms. Easthope:

Thank you for your recent letter expressing concerns about the 1997 Agency for Toxic Substances and Disease Registry (ATSDR) Dioxin Policy Guidelines for Residential Soil, particularly regarding the "Action Level" of 1,000 ppt. Our experience corresponds to the concern you raised; the concept of an "Action Level" for dioxins in soils has sometimes been misunderstood. The Action Level was intended to trigger consideration of various public health actions. It was not intended either to define the need for remediation or to serve as a threshold below which there is no public health concern. The appropriate application of the policy guideline is to compare site-specific data to the 50 ppt screening level, not the 1,000 ppt Action Level, to determine the need for further evaluation.

As you indicated in your letter, we understand that certain Michigan state legislators have been referring to our Action Level in proposed legislation to modify the state cleanup for dioxins in soil. This is an example of how our guidelines have been applied in ways that we did not intend. To address this concern, ATSDR has drafted a revised policy guideline for dioxins in residential soils. The revision has been peer-reviewed and presented to our Board of Scientific Counselors (BSC). This revision is intended to address confusion about the concept of an Action Level for dioxins in residential soil. However, before we formally release the revised policy guideline, we want to ensure that our guidelines remain well-supported by the best available scientific information. As you know, the National Academy of Sciences (NAS) is conducting an extensive review of the U.S. Environmental Protection Agency (EPA) Dioxin Reassessment Report, which is scheduled to be released in the very near future. ATSDR has decided to wait to release its revised guidelines until the NAS completes its review of the EPA report. Doing so will give us the opportunity to determine how the NAS assessment may influence ATSDR's dioxin policy.

You also expressed a concern about presentations at our BSC meetings. BSC meetings are open meetings, and individual or groups can request time to make presentations on specific agenda items. Information about discussion topics for upcoming BSC meetings is routinely announced in the Federal Register.

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Both you and Michelle Hurd-Riddick have requested a meeting with me. I am glad to meet with both of you. Please contact my secretary at (404) 498-0004 to schedule a meeting.

Thank you for your interest in our public health activities in Michigan.

Sincerely,

A handwritten signature in black ink, appearing to read "Howard Frumkin". The signature is fluid and cursive, with a large initial "H" and "F".

Howard Frumkin, M.D., Dr.P.H.

Director, National Center for Environmental Health/
Agency for Toxic Substances and Disease Registry