February 1, 2011

Lisa Jackson
EPA Administrator
U.S. Environmental Protection Agency
Ariel Rios Building
1200 Pennsylvania Ave
Washington, DC 20460

Dear Administrator Jackson:

This past week, Dr. David Garabrant and his team from the University of Michigan, under contract to Dow Chemical released additional conclusions from the University of Michigan Dioxin Exposure Study (UMDES). They have mailed a summary of this to area residents. State and national agencies did not review or see these materials prior to distribution. Moreover, the data analyses on which the new conclusions are based have not been published or made available on the UMDES website.

This release comes in the middle of the public comment period for EPA’s negotiated Interim Response Actions to limit human exposure to dioxin and furan contamination in areas along the Tittabawassee River floodplain. (AOC CERCLA DOCKET No. V-W-10-C-942)

We believe the mailing by the University of Michigan was inappropriate and premature, inasmuch as it is clearly intended to influence public opinion before the new study has been published in a peer-reviewed journal and made available for public scrutiny. It also sends conflicting signals to the population, and interferes with and frustrates public health efforts to educate the public about legitimate health threats. We urge EPA to once again address the limitations of the UMDES study, its interpretation, and its limited utility in setting appropriate public health guidance. We are calling upon EPA to:
• Inform residents that the mailing from UMDES was premature, inasmuch as its conclusions are based on data analyses that have not been published or made publicly available.

• Expedite a review by ORD of the new findings in the UMDES

• Develop an EPA fact sheet regarding this review and identify any limitations of the UMDES and its interpretation.

• Mail this fact sheet to residents

• Consider another visit to the region to address the public.

As always we appreciate EPA’s attention and commitment to the people of Michigan’s largest watershed. We look forward to hearing from you soon on this pressing matter.

Sincerely,

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