

Lone Tree Council
P.O. 1251, Bay City, Michigan 48706
(Fighting for environmental justice since 1978)

January 12, 2012

The Honorable Lisa P. Jackson
Administrator
U.S. Environmental Protection Agency
1200 Ariel Rios Building
Washington, DC 20460

Dear EPA Administrator Jackson:

Thank you for your ongoing attention to dioxin. The Dioxin Reassessment document is extremely important to the health of the American people and we applaud your efforts to bring this long delayed process to closure.

We are writing to strongly urge you to finalize the non-cancer dioxin IRIS assessment by the end of January, and expeditiously release the cancer dioxin IRIS assessment as you have pledged to do. It is of paramount importance to communities like ours that are highly contaminated with dioxins from Dow Chemical's world headquarters in Midland Michigan.

In May of 2009 you personally assured us in a much appreciated phone conversation that the release of the dioxin reassessment was a priority for you. We are hopeful that this New Year will see this come to fruition. As you know, thousands of acres of flood plain and 52 miles of river are highly contaminated with Dow's dioxin. Game, fish and soil advisories abound in the region. EPA says Dow Chemical is the primary contributor of dioxin to Lake Huron. It was 10 years ago this month that the public was informed of the high levels of dioxin found at the confluence of the Saginaw and Tittabawassee Rivers. Thirty plus years since high levels of dioxin were found in Walleye in the river. Generations of children, families, and low income, migrant and subsistence fishers have been poisoned. It is time release the dioxin reassessment.

Since 1985, efforts by EPA to assess the risks of dioxin have been delayed time and time again. Scientists at EPA have long concluded dioxin and dioxin-like compounds are highly toxic, but a strong coalition of industries responsible for generating dioxins as a by-product of production and disposal have successfully stalled the completion of this health assessment report. As EPA has continued to work on the Dioxin Reassessment, people in communities across the country are continuing to be exposed to this highly toxic chemical. We are very concerned that industry is attempting to stall the release of this important report yet again. EPA, Region V, has documented in detail the recalcitrance of Dow Chemical in dealing with their dioxin

contamination in mid- Michigan. Is it Lone Tree Council's position, that the American Chemical Council's call for further delay of the dioxin reassessment is part and parcel with Dow Chemical's efforts to delay a good cleanup and obfuscate the toxicity of dioxin.

On August 29, 2011, EPA announced its final plan for completing the Dioxin Reassessment. EPA committed to completing the non-cancer portion of the reanalysis and posting it to the IRIS database by the end of January 2012 and to then complete the cancer portion of the reanalysis "as quickly as possible." EPA stated that once the Agency completes both the non-cancer and cancer portions of the Reanalysis, the Dioxin Reassessment would be considered final.

We are extremely dismayed that the American Chemistry Council (ACC) and other industry trade associations are once again pressuring EPA to further delay the release of this important document. We believe the American public has a right to know about the health consequences of exposure to dioxin, and EPA needs to take steps to protect American families from this unnecessary harmful class of chemicals.

We urge you to meet your schedule of finalizing the non-cancer portion of the dioxin reanalysis by the end of this January and to finalize the cancer portion as quickly as possible thereafter as you have pledged.

Thank you for your attention to this matter, and for your commitment to protecting America's health and environment.

Sincerely,

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Cass Sunstein, Administrator, Office of Information and Regulatory Affairs
Nancy Sutley, Chair, White House Council on Environmental Quality (CEQ)
Paul Anastas, Assistant Administrator, Office of Research and Development, EPA
Rebecca Clark, Acting Director, National Center for Environmental Assessment,
Terry Miller, Chair, Lone Tree Council
Tracey Easthope MPH, Ecology Center Ann Arbor, MI
Cyndi Roper, Michigan Clean Water Action
Chris Kolb, Michigan Environmental Council
Kathy Henry, Tittabawassee River Watch
Pat Bradt, Zilwaukee Twp (Saginaw River dredge slurry pit)