



January 20, 2012

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

Dear EPA Administrator Jackson:

Finalizing 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 portion of this assessment by the end of January, and to complete the cancer portion as quickly thereafter as possible, as you have pledged to do.

As you may know, our organization was founded out of the dioxin-contamination struggle at Love Canal in Niagara Falls, NY over thirty years ago. Since then, CHEJ has been following and participating in EPA's activities on dioxin since 1994. We have submitted comments on the EPA draft reassessment documents released in 1994 and 2000; on the EPA's Science Advisory Board (SAB) reviews in 1995, 2001 and 2010; on the National Academy of Science (NAS) committees reviews in 2003, 2006 and 2011; provided comments to the agency on its Recommended Interim Preliminary Remediation Goals (PRGs) for Dioxin In Soil at CERCLA and RCRA Sites in 2009; and participated in numerous related workshops and meetings. We have published two major publications on dioxin, the book *Dying from Dioxin* in 1995 and *The American People's Report on Dioxin* in 1999 and have contributed to the organization of two major national citizen's conferences on dioxin in Baton Rouge, LA in 1996 and Berkeley, CA in 2000. We have worked closely with many dioxin-polluted communities over the past thirty years, such as the communities relocated from Times Beach, Missouri and Pensacola, FL, and more recently residents living near Dow Chemical outside Midland, MI. We have also contributed to the organization of numerous sign-on letters with communities impacted by dioxin, local, state and national environmental health, environmental justice, consumer, labor, parenting and health-affected organizations encouraging the agency to finish its work on dioxin and release the reassessment report.

During this entire time we have repeatedly urged you and your predecessors to complete the Dioxin Reassessment so that communities across this country where dioxin contamination exists can benefit from the hard work and long commitment of the agency to provide the best scientific understanding of the risks posed by exposure to dioxin and dioxin-like compounds. We are writing asking you once again to not delay the completion of this important document.

It is outrageous that EPA has been evaluating the risks of dioxin exposure since 1985 – for more than 25 years – and that the agency has repeatedly allowed the regulated industry to delay its efforts to finalize its assessment. Using the best science and science policy to address uncertainty, EPA has long concluded that 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.

Yet once again, industry is attempting to stall the release of this important report. The American Chemistry Council (ACC) and other industry trade associations are once again pressuring the agency to further delay the release of this important document. Once again they are asking for more review, more certainty, and more delays. EPA will never satisfy these requests no matter what information you provide, because these groups continue to benefit from an incomplete report that is not finalized.

The ACC has inaccurately cited the recent IRIS Congressional rider stating that, "to comply with Congress's direction, EPA should withdraw the dioxin assessment from interagency review and take the necessary steps to implement the NAS recommendations." The Dioxin Reassessment was not released in draft form in fiscal year 2012, and therefore this stipulation does not apply to the EPA's Dioxin Reassessment. The EPA's initial dioxin health assessment report was written in 1985, with revised draft reassessments issued in 1994, 2000, and 2003. Since then, the Dioxin Reassessment has been in the final stages for close to nine years. Additionally, the National Academy of Sciences (NAS) has already issued (in 2006) a very detailed report reviewing the EPA's Dioxin Reassessment. Since the NAS issued their report, the EPA issued a response to the NAS report and formed a SAB to review the EPA's response to the NAS. Prior to that, the EPA had already three separate SAB review panels to review the draft Dioxin report in 1988, 1995 and 2001. Additional reviews are not necessary and would only serve to further delay the completion of this important public health document.

Clearly you recognize that finalizing this document in no way locks the agency into a rigid position or understanding of dioxin's risks. Science is constantly evolving as is the understanding of the human health effects and risks posed by exposure to dioxin and dioxin-like compounds. Nothing prevents the agency from further updating its health assessment in a year or two if new information is revealed that alters its findings and conclusions at any point in time. This is what the agency has done with other chemicals posted to the IRIS database and it is what it should do with dioxin as well.

EPA has a moral and ethical responsibility to make public in final form its best scientific opinion on the health risks posed by exposure to dioxin and dioxin-like compounds. The American public has a right to know about the health consequences of exposure to dioxins, and EPA needs to take steps to protect American families from this unnecessary harmful class of chemicals.

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

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

Sincerely,



Lois Mare Gibbs
Executive Director

cc: 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