

Center for Health, Environment and Justice
ACME Aerospace Cancer Museum of Education
Alaska Community Action on Toxics (ACAT)
American Association on Intellectual and Developmental Disabilities (AAIDD)
Barge Park Pals
Blue Ridge Environmental Defense League
Breast Cancer Fund
Caney Fork Headwaters Association
Center for Food Safety
Center for Media and Democracy
Center for Public Environmental Oversight (CPEO)
Center for International Environmental Law
Citizens Against Ruining the Environment
cleanuprocketdyne.org
Clean Production Action
Clean Water Action
Commonweal
Communities Against Toxics
Community Health and environment coalition
Concerned Citizens of Lake Twp.
Connecticut Coalition for Environmental Justice
Cumberland Countians for Peace & Justice
Dogwood Alliance
Downwinders At Risk
Ecology Center
Edison Wetlands Association
Electronics TakeBack Coalition
Empire State Consumer Project
Environmental Health Fund
Environmental Research Foundation
Environment Illinois
Farmworker Association of Florida
Farmworker Health and Safety Institute
Finger Lakes Zero Waste Coalition
GAIA
Galveston BAYKEEPER
Global Community Monitor
Glynn Environmental Coalition
Great Neck Breast Cancer Coalition
Green Change
Green Press Initiative
HabitatMap
Healthy Building Network
Healthy Child Healthy World
Hopewell Junction Citizens for Clean Water
Indiana Toxics Action

**Institute for Children's Environmental Health
Kentucky Resources Council, Inc.
Kids for Saving Earth
Lone Tree Council
MOMS - Making Our Milk Safe
Montana Environmental Information Center
Network for Environmental & Economic Responsibility – United Church of Christ
Northwest Atlantic Marine Alliance
Nuclear Information and Resource Service
NYPIRG
Organic Consumers Association
Pesticide Free Zone
Protect All Children's Environment
RAMP(Rochesterians Against the Misuse of Pesticides)
Stop the Spray Marin
The Story of Stuff Project
Sustainable San Anselmo
Tittabwassee River Watch
Toxics Action Center
ToxicTargets.org
Victor Citizens Against Contamination
Voices Opposed To Environmental Racism
Western Broome Environmental Stakeholders Coalition
Western New York Council on Occupational Safety and Health
WildWest Institute
Women's Voices for the Earth
Worksafe**

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

February 10, 2009

Dear EPA Administrator Jackson:

We are writing to express our deep concern over the Bush administration's departing gift to the chemical industry on October 15th, 2008 -- the formation of yet another review of the EPA's health assessment study on dioxins, one of the most toxic chemicals on earth.

We request that you cancel the unnecessary review and release the Dioxin Reassessment so that the EPA and others can move forward in developing protective dioxin policies and standards.

The EPA completed its first report on dioxins in 1985, and began its reassessment in 1988. The EPA began its second reassessment in 1991. Since that time the completion of this report has been repeatedly delayed by the chemical industry for close to twenty years. The EPA already released a final draft in 2000 and an EPA Science Advisory Board (SAB) already reviewed this report in 2000-2001. In June, 2001, the EPA Science Advisory Board sent a letter to EPA Administrator Christine Whitman (see enclosed) urging the reassessment be completed and released 'expeditiously.' Since then it's been further delayed and another review is not necessary. This new review will take several years to complete at least, and will further delay regulation of this highly persistent bioaccumulative toxic (PBT) chemical. In fact, the Dioxin Reassessment delays were recently highlighted in the U.S. Government Accountability Office's report, *High-Risk Series: An Update*.

Dioxins are a family of chemicals that are known to cause cancer and to disrupt the endocrine system. They are active in the body at very low levels. Dioxins can cause developmental and immune effects at levels close to those currently found in the general population. Every American eats dioxins when they consume fatty foods, and nearly every American has measurable levels of this chemical in their body. The toxicity of dioxins is of such concern that they have been targeted for global phase out by over 100 nations across the world through the Stockholm Convention on Persistent Organic Pollutants. They've also been targeted for virtual elimination in the Great Lakes through the U.S. and Canadian Great Lakes Binational Toxics Strategy.

The EPA study—called the "Dioxin Reassessment"—still remains a draft, which has stymied the agency's development of federal regulations for over 15 years. Evidence has accumulated since EPA began its reassessment in 1988 that dioxins cause many other health problems even at low levels, including cancer, developmental problems in children, immunologic problems in children and adults, reproductive problems in adults, and diabetes.

In 1985, EPA concluded that there was an increased cancer risk in humans at dioxin exposure levels lower than had been estimated by any government agency anywhere in the world. Dioxin is the most potent carcinogen ever evaluated by the agency. Scientists at EPA have long concluded dioxins 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 for over 15 years. Chlorine-based industries have demanded reviews, reassessments and re-analyses. Each re-assessment and review affirmed the findings and newer scientific data continues to strengthen the conclusions that dioxins are a serious public health threat. Most recently, the National Academies released a 2006 report confirming what numerous scientific panels have concluded: dioxin is a potent cancer-causing chemical. The chlorine-based industry is following the tobacco industry's strategies to keep information from the public and delay release of the report. Enclosed is a document that summarizes these delays.

While panels are convened, people in communities across the country are continuing to be exposed to this highly toxic chemical. Many state regulating agencies have ignored dioxin contamination and risks because of the lack of a final health assessment from the EPA. Dioxin contamination is particularly high in areas with dioxin sources like incinerators, smelters, pulp and paper mills, chemical factories or other industries that use chlorine. These dioxin sources are predominantly located in low-income communities of color, making this a major issue of environmental justice and racism. The disposal of polyvinyl chloride (PVC) plastic is the largest source of dioxin-forming chlorine in solid waste. PVC is the leading contributor of chlorine to four combustion sources— municipal solid waste incinerators, backyard burn barrels, medical

waste incinerators and secondary copper smelters—that account for an estimated 80% of dioxin air emissions. Residents living near PVC chemical plants in Mossville, LA had three times more dioxin in their blood than the average U.S. citizen. Dioxin has been found at hundreds of Superfund toxic waste sites. It was a contaminant at the Love Canal landfill in NY where over 900 families were relocated and in Agent Orange, the herbicide sprayed in Vietnam that resulted in major health impacts for Vietnam Veterans. Dioxins have been found in milk, cheese, beef, pork, fish, chicken, birds, deer, turkey, squirrel, and worms, as well as soil and sewage sludge.

In your January 23rd letter to EPA employees, you stated that, *“Science must be the backbone for EPA programs. The public health and environmental laws that Congress has enacted depend on rigorous adherence to the best available science... More than 30 years after Congress enacted the Toxic Substances Control Act, it is clear that we are not doing an adequate job of assessing and managing the risks of chemicals in consumer products, the workplace and the environment. It is now time to revise and strengthen EPA’s chemicals management and risk assessment programs.”* The dioxin reassessment’s delays are a perfect example of the need for scientific integrity and an overhaul of EPA’s chemicals management and risk assessment programs.

We request that you cancel the unnecessary review and release the Dioxin Reassessment so that the EPA and others can move forward in developing protective dioxin policies and standards.

We also request the opportunity to meet with you to discuss this further. To schedule a meeting, please contact Mike Schade at CHEJ: (212) 964-3680 / mike@chej.org

Thank you for your attention to this critical environmental health and justice issue.

Sincerely,

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Scot Quaranda
Dogwood Alliance

Downwinders At Risk

Tracey Easthope
Ecology Center

Bob Spiegel, Executive Director
Edison Wetlands Association

Barbara Kyle, National Coordinator
Electronics TakeBack Coalition

Judy Braiman
Empire State Consumer Project
RAMP(Rochesterians Against the Misuse of
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Farmworker Association of Florida

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Katherine Bourbeau
Finger Lakes Zero Waste Coalition

Neil Tangri
GAIA

Charlotte Wells
Galveston BAYKEEPER

Denny Larson, Executive Director
Global Community Monitor

Daniel Parshley, Project Manager
Glynn Environmental Coalition

Laura Weinberg, President
Great Neck Breast Cancer Coalition

Marnie Glickman, Executive Director
Green Change

Tyson Miller
Green Press Initiative

Michael Heimbinder
HabitatMap

Paul Bogart
Healthy Building Network

Christopher Gavigan
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Healthy Child Healthy World

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Tessa Hill, President
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Michelle Hurd Riddick
Lone Tree Council

Mary Brune, Co-founder & Director
MOMS - Making Our Milk Safe

Anne Hedges, Program Director
Montana Environmental Information Center

Donald B. Clark
Network for Environmental & Economic
Responsibility – United Church of Christ

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Northwest Atlantic Marine Alliance

Diane D'Arrigo, radioactive waste project
Director
Nuclear Information and Resource Service

Laura Haight
NYPIRG

Ronnie Cummins, Director
Organic Consumers Association

Whitney Merchant
Pesticide Free Zone

Stop the Spray Marin
Sustainable San Anselmo

E.M.T. O'Nan, Director
Protect All Children's Environment

Annie Leonard
The Story of Stuff Project

Kathy Henry
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Stephanie Smolen
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Roger Cook, Executive Director
Western New York Council on Occupational
Safety and Health

Matthew Koehler, Executive Director
WildWest Institute

Tracy Lakatua, Executive Director
Women's Voices for the Earth

Suzanne Murphy
Worksafe

Enclosures: EPA Science Advisory Board 2001 letter to EPA Administrator Christine Whitman
History of Dangerous Delays on Dioxin Protective Policy