



**US Magnesium LLC**

238 North 2200 West - Salt Lake City, UT 84116-2921  
801/532-2043 - 800/262-9624 - FACSIMILE 801/534-1407

---

July 6, 2010

Office of Environmental Information (OEI)  
Docket Center (Mail Code: 2822T)  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, N.W.  
Washington D.C. 20460

**Re: Docket ID No. EPA-HQ-ORD-2010-0395 Email: [ord.Docket@epa.gov](mailto:ord.Docket@epa.gov)**

Dear Sir or Madam:

This letter concerns the forthcoming EPA Science Advisory Board (SAB) Dioxin Review Panel meeting on July 13-15, 2010 to review *EPA's Reanalysis of Key Issues Related to Dioxin Toxicity and Response to NAS Comments, External Review Draft* ("Draft Reanalysis").<sup>1</sup>

US Magnesium LLC is interested in the Draft Reanalysis and the SAB's review of it. However, US Magnesium is concerned that the SAB's three-day meeting in July is mismatched with the public comment period on the Draft Reanalysis, which extends until September 20, 2010. In particular, during the SAB teleconference on June 24, 2010, Dr. Timothy Buckley, the Review Panel chair, stated the Review Panel would be "moving toward consensus" at the July meeting. Such action seems inconsistent with the IRIS Step 4 process, to which the Draft Reanalysis is subject, in that it deprives the Dioxin Review Panel of the opportunity to review public comments on the Draft Reanalysis before developing any consensus.

The Draft Reanalysis is almost 2,000 pages. It has been over four years in the making. It is unrealistic for interested members of the public, including US Magnesium, to provide meaningful comment by July 7, 2010 in order for the Dioxin Review Panel to consider such comments at its July meetings. Accordingly, and consistent with Step 4 of the IRIS review process, US Magnesium requests the Dioxin Review Panel to make clear in its agenda for the July meeting that its purpose is to allow the panel and the public to

---

<sup>1</sup> EPA/600/R-10/038A.

Office of Environmental Information (OEI)  
U.S. Environmental Protection Agency  
July 1, 2010  
Page Two

identify and discuss significant issues with the Draft Reanalysis and the charge questions. The July meeting should be an opportunity for the SAB panel to initiate introductory discussion, not to reach preliminary conclusions or a premature "move toward consensus."

US Magnesium appreciates the Dioxin Review Panel has announced an additional meeting in the fall, following the close of the public comment period and receipt of comments. However, if the panel has already reached preliminary conclusions about the Draft Reanalysis and the charge questions, the fall meeting may not provide a full consideration of issues presented in public comments.

Given the importance of the dioxin reassessment process, its lengthy duration and the size and complexity of the Draft Reanalysis, US Magnesium urges the SAB Dioxin Review Panel to refrain from drawing any preliminary substantive conclusions during the July meeting, but to reserve those judgments until it receives and reviews all comments submitted during the public comment period.

Thank you for your consideration.

Sincerely yours,

/S/

G. Thomas Tripp  
Technical Services Manager  
US Magnesium LLC

cc; Dr. Thomas Armitage, DFO  
Dr. Timothy Buckley, Chair  
Dr. Vanessa Vu, Director