

Comments from Chuck Hersey, Southeast Michigan Council of Governments (SEMCOG)

TO: Dr. Thomas Armitage, Designated Federal Officer (DFO), EPA Science Advisory Board Staff Office

The Southeast Michigan Council of Governments (SEMCOG), a local government organization representing 164 members and the region's lead local water quality planning agency under the Clean Water Act, asks that you consider the following comments with respect to EPA's draft recommended Remediation Goals for Dioxin in Soil at CERCLA and RCRA Sites.

EPA's Interim Preliminary Remediation Goals will introduce a much more stringent cleanup standard for dioxin and it will do so without a thorough vetting within the scientific community. To introduce a new standard that is not grounded in the best science, creates uncertainty and may not have any benefit at all to the environmental conditions at these sites.

- This uncertainty may cause cleanups currently underway to halt and much-needed redevelopment to be delayed. We believe strongly that unnecessarily delaying the cleanup process will hinder the economic advancement we are working hard to cultivate.
- A more stringent standard will reopen cleanups that have been complete, creating a drain on scarce state resources and potential panic in neighboring communities.

Although EPA describes these standards as "preliminary" and "interim," their practical effect has real consequences. Given the potential adverse impact on the communities of Michigan, we believe it is important to proceed with caution on this critical matter. We ask that you ensure that dioxin Preliminary Remediation Goals selected by EPA are fully reviewed by the scientific community by waiting until EPA has completed the reassessment. Otherwise, we will create uncertainty by putting numbers in place that are recognized as interim causing confusion about what actions would be considered final.

The communities we live in are struggling. Additional burdens will only increase the crushing weight of unemployment and economic hardship that Michigan families are dealing with on a daily basis. We appreciate your attention to our concerns.

Chuck Hersey

SEMCOG