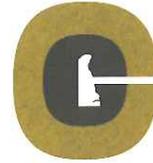


DELAWARE STATE
CHAMBER OF COMMERCE



Thomas J. Cooper, Chairman
James A. Wolfe, President & CEO

October 21, 2010

EPA Docket Center
Environmental Protection Agency
Mail Code: 5305T
1200 Pennsylvania Ave., NW
Washington, DC 20460

RE : Docket ID No. EPA-HQ-SFUND-2009-0907

On behalf of The Delaware State Chamber of Commerce and it's members, I urge you not to finalize EPA's proposed interim guidance on dioxin in soils at CERCLA and RCRA sites until the dioxin reassessment is completed and the consensus science is reached and can be part of any decision on changes to the current policy.

We believe that if this guidance is adopted it will have a "chilling" effect on redeveloping Brownfield properties in the State of Delaware. Furthermore, because of the increased costs that will be incurred during cleanup of soils to the proposed levels, we have been advised that this guidance should have invoked Executive Order 13132, whereby local and state government groups are to be consulted.

The Delaware State Chamber of Commerce requests that EPA give consideration to the development of new and/or additional options for dioxin remediation at CERCLA and RCRA sites. The current proposal to lower dioxin screening levels would only add to remedial roadblocks that already slow down the pace of the redevelopment at these sites.

Thank you for your consideration.

Sincerely,

 James A. Wolfe 