

November 18, 2010

VIA E-mail

Dr. Timothy Buckley, Chair
Dioxin Review Panel
Science Advisory Board
Ohio State University

Dear Dr. Buckley:

The undersigned organizations write to follow up on key outcomes from the October 27-29, 2010, Dioxin SAB Review Panel (Panel) discussion of EPA's Reanalysis of Key Issues Related to Dioxin Toxicity and Response to NAS Comments (Reanalysis). Given the significant public health, scientific and economic impacts of dioxin risk management decisions, it is of paramount importance that EPA's Reanalysis document reflects the best available science.

As stakeholders and participants in the meeting, we support the Panel's recommendations that EPA:

1. Include a thorough non-linear dose-response evaluation, as unanimously recommended by the NAS, and a comprehensive presentation of the current science on mode of action;
2. Conduct an uncertainty analysis, and include the uncertainties associated with the Toxic Equivalency Factors (TEFs);
3. More fully utilize information learned from Dioxin-Like Compounds (DLCs) in derivation of toxicity values and in the mode-of-action examination.

Technical comments submitted by ACC and others during public comment periods in July, September and October 2010, thoroughly define many of the substantive concerns with the Reanalysis. We urge the Panel to address the substance of those comments in its draft report. In addition, the Panel is urged to request that EPA:

1. Subject the Reanalysis to a rigorous quality control and assurance protocol to eliminate errors and discrepancies eliminated from the document. Dr. Glenn Rice's opening comments at the SAB on October 27, 2010, and Dr. Lesa Aylward's technical review of table 5-21 of the Reanalysis (submitted to the SAB October 29, 2010) highlight this need.
2. Describe the procedure that EPA will use to integrate the Reanalysis and the 2003 draft Dioxin Reassessment, as revised in response to the Panel's

recommendations, the 2006 NAS report and public comments, into one coherent, scientifically meaningful document. The SAB must provide guidance to EPA in this area. Unless the revised Reanalysis is fully integrated into the revised draft Dioxin Reassessment, the final dioxin assessment will contain an amalgam of old and new science that is likely to confuse both risk managers and the public. Only thorough integration of the revised Reanalysis and revised Dioxin Reassessment will result in a comprehensive, stand-alone document that comprises the best available science.

It is clear from the Panel's deliberations that EPA still has not adequately responded to recommendations of the 2006 NAS panel and prior SAB panels, failures that have delayed completion of EPA's final risk assessment. While we recognize the desire to avoid further delays, expediency should not undermine EPA's responsibility to provide a thorough and scientifically sound document.

The Panel's work addresses issues that are fundamental to informed and scientifically sound risk management decisions. We appreciate your consideration of these comments, and look forward to reviewing the Panel's draft report and the ensuing discussions.

Please do not hesitate to contact Sarah McLallen of the American Chemistry Council (202-249-6719) if we can be of any assistance.

Sincerely:

American Chemistry Council
American Meat Institute
E. I. du Pont de Nemours and Company, Inc.
General Electric Company
Pentachlorophenol Task Force
PPG Industries
The American Forest & Paper Association
The Dow Chemical Company
The Horinko Group
US Magnesium, LLC

cc: Dr. Thomas Armitage, DFO
Dr. Vanessa Vu, Director