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SUMMITTED VIA:  
Email to [armitage.thomas@epa.gov](mailto:armitage.thomas@epa.gov);  
[www.regulations.gov](http://www.regulations.gov). Proceed to Docket ID  
No. EPA-HQ-ORD-2010-0395

July 9, 2010

Office of Environmental Information Docket  
Mail Code 2822T  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, NW  
Washington, D.C. 20460

Re: Docket ID No. EPA-HQ-ORD-2010-0395 Submission of Preliminary Comments On  
"EPA's Reanalysis of Key Issues Relating to Dioxin Toxicity and Response to NAS  
Comments"

The E. I. du Pont de Nemours and Company (DuPont) appreciates the opportunity to provide comments on the "Draft Reanalysis of Key Issues Related to Dioxin Toxicity and Response to NAS Comments" (Draft Reanalysis), published by the U.S. Environmental Protection Agency ("EPA" or "the Agency") in the May 21, 2010 Federal Register. 75 Fed. Reg. 28610.

These comments are preliminary, as DuPont has not completed its technical review of the Draft Reanalysis at this time. However, in light of the need to comply with the deadline EPA has established for submitting comments that will be furnished to the Science Advisory Board (SAB) expert peer review panel for its July 13-15 public meeting on the draft Reanalysis, we here indicate our support for those technical comments provided by the American Chemistry Council (ACC). A number of specific issues that EPA should consider have been identified and discussed in comments developed by the Chlorine Chemistry Division (C2), a business council of the ACC both orally at the July 9<sup>th</sup> Listening Session (submitted July 2) and written comments to the docket (submitted July 9<sup>th</sup>). DuPont supports these comments and the recommendations therein. The C2 comments are incorporated here by reference. DuPont intends to submit additional comments by the September 20, 2010 close of the comment period for the Reanalysis.

In light of the complex nature and length of the Draft Reanalysis, DuPont urges the EPA and its SAB to allow due time for proper review and input from the public. While we appreciate that the EPA has now scheduled a second SAB meeting to be held after receipt

of public comments, we are somewhat concerned that the goal of the first SAB meeting is to attempt to reach consensus (as indicated in the SAB's June 24<sup>th</sup> Teleconference by its Chair Dr. Buckley) on technical issues without the benefit of full public input. Consistent with Step 4 of the IRIS process, to which the Draft Reanalysis is subject, the SAB should use this first meeting to identify significant issues (with the help of public input) rather than to reach consensus on technical issues.

DuPont is a 208 year old science company. Our vision is to be the world's most dynamic science company, creating sustainable solutions essential to a better, safer, healthier life for people everywhere. In this light, and taking into account EPA's focus on incorporating the state of the science, we strongly recommend that EPA and its SAB defer decisions related to the Draft Reanalysis until later in the process, after there has been sufficient opportunity for thoughtful and constructive scientific input.

Respectfully Submitted

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