



July 7, 2010

## **Public Comment**

### **Draft - EPA's Reanalysis of Key Issues Related to Dioxin Toxicity and Response to NAS Comments - [FRL-9167-1; Docket ID No. EPA-HQ-ORD-2010-0395]**

Clean Water Action is a national organization with 1.2 million members and has worked on a wide array of health and environmental issues since 1972. We appreciate the opportunity to make these comments. Clean Water Action has been concerned with dioxin contamination at every stage - from the community to the federal regulatory process. For example, Clean Water Action has been involved with controversies over siting municipal and medical waste incinerators all over the country. The organization also has a strong interest in chemical policies that prevent pollution at the source and which drive reduction of exposure to chemicals linked to cancer, reproductive problems, neurological and immunological effects and other health epidemics plaguing our population.

The Environmental Protection Agency (EPA) reassessment of the toxicity of dioxin has been underway for almost 3 decades. The prolonged process goes far beyond what reasonable debate and robust science require. Clean Water Action supports moving forward with this important piece of work and the **Reanalysis of Key Issues Related to Dioxin Toxicity and Response to NAS Comments** is a solid step in that direction.

EPA has answered the National Academy of Sciences questions thoroughly and we support the findings of the report, including use of the linear no threshold model for determining cancer risk and the setting of a reference dose. Classifying dioxin as a known human carcinogen should no longer be a debate; the EPA needs to join the World Health Organization and the Department of Health and Human Services' National Toxicology Program in making this determination.

We urge EPA to finalize this report and move the Reassessment forward. EPA can and should meet its stated goal of finalizing the Reassessment in 2010.

In the decades since EPA began the Reassessment, communities have struggled with on-going contamination from local sources. Clean-up at contaminated sites has been postponed, posing real health risks and economic harm as well. Meanwhile, the important work of addressing sources of dioxin has been unnecessarily delayed, resulting in continued exposure through the food chain and other sources. There is no reasonable explanation for further delay when the US population carries body burdens of dioxin at levels known to cause harm.

Finalization of the Dioxin Reassessment will result in protection of public health, in improved quality of life across the country and in innovation – it is good public policy and it is long overdue.

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