

**Center for Health, Environment and Justice**  
**ACME Aerospace Cancer Museum of Education**  
**Alaska Community Action on Toxics (ACAT)**  
**American Association on Intellectual and Developmental Disabilities (AAIDD)**  
**Barge Park Pals**  
**Blue Ridge Environmental Defense League**  
**Breast Cancer Fund**  
**Caney Fork Headwaters Association**  
**Center for Food Safety**  
**Center for Media and Democracy**  
**Center for Public Environmental Oversight (CPEO)**  
**Center for International Environmental Law**  
**Citizens Against Ruining the Environment**  
**cleanuprocketdyne.org**  
**Clean Production Action**  
**Clean Water Action**  
**Commonweal**  
**Communities Against Toxics**  
**Community Health and environment coalition**  
**Concerned Citizens of Lake Twp.**  
**Connecticut Coalition for Environmental Justice**  
**Cumberland Countians for Peace & Justice**  
**Dogwood Alliance**  
**Downwinders At Risk**  
**Ecology Center**  
**Edison Wetlands Association**  
**Electronics TakeBack Coalition**  
**Empire State Consumer Project**  
**Environmental Health Fund**  
**Environmental Research Foundation**  
**Environment Illinois**  
**Farmworker Association of Florida**  
**Farmworker Health and Safety Institute**  
**Finger Lakes Zero Waste Coalition**  
**GAIA**  
**Galveston BAYKEEPER**  
**Global Community Monitor**  
**Glynn Environmental Coalition**  
**Great Neck Breast Cancer Coalition**  
**Green Change**  
**Green Press Initiative**  
**HabitatMap**  
**Healthy Building Network**  
**Healthy Child Healthy World**  
**Hopewell Junction Citizens for Clean Water**  
**Indiana Toxics Action**

**Institute for Children's Environmental Health  
Kentucky Resources Council, Inc.  
Kids for Saving Earth  
Lone Tree Council  
MOMS - Making Our Milk Safe  
Montana Environmental Information Center  
Network for Environmental & Economic Responsibility – United Church of Christ  
Northwest Atlantic Marine Alliance  
Nuclear Information and Resource Service  
NYPIRG  
Organic Consumers Association  
Pesticide Free Zone  
Protect All Children's Environment  
RAMP(Rochesterians Against the Misuse of Pesticides)  
Stop the Spray Marin  
The Story of Stuff Project  
Sustainable San Anselmo  
Tittabwassee River Watch  
Toxics Action Center  
ToxicTargets.org  
Victor Citizens Against Contamination  
Voices Opposed To Environmental Racism  
Western Broome Environmental Stakeholders Coalition  
Western New York Council on Occupational Safety and Health  
WildWest Institute  
Women's Voices for the Earth  
Worksafe**

Lisa Jackson  
EPA Administrator  
U.S. Environmental Protection Agency  
Ariel Rios Building  
1200 Pennsylvania Avenue, N.W.  
Washington, DC 20460

February 10, 2009

Dear EPA Administrator Jackson:

We are writing to express our deep concern over the Bush administration's departing gift to the chemical industry on October 15<sup>th</sup>, 2008 -- the formation of yet another review of the EPA's health assessment study on dioxins, one of the most toxic chemicals on earth.

**We request that you cancel the unnecessary review and release the Dioxin Reassessment so that the EPA and others can move forward in developing protective dioxin policies and standards.**

The EPA completed its first report on dioxins in 1985, and began its reassessment in 1988. The EPA began its second reassessment in 1991. Since that time the completion of this report has been repeatedly delayed by the chemical industry for close to twenty years. The EPA already released a final draft in 2000 and an EPA Science Advisory Board (SAB) already reviewed this report in 2000-2001. In June, 2001, the EPA Science Advisory Board sent a letter to EPA Administrator Christine Whitman (see enclosed) urging the reassessment be completed and released 'expeditiously.' Since then it's been further delayed and another review is not necessary. This new review will take several years to complete at least, and will further delay regulation of this highly persistent bioaccumulative toxic (PBT) chemical. In fact, the Dioxin Reassessment delays were recently highlighted in the U.S. Government Accountability Office's report, *High-Risk Series: An Update*.

Dioxins are a family of chemicals that are known to cause cancer and to disrupt the endocrine system. They are active in the body at very low levels. Dioxins can cause developmental and immune effects at levels close to those currently found in the general population. Every American eats dioxins when they consume fatty foods, and nearly every American has measurable levels of this chemical in their body. The toxicity of dioxins is of such concern that they have been targeted for global phase out by over 100 nations across the world through the Stockholm Convention on Persistent Organic Pollutants. They've also been targeted for virtual elimination in the Great Lakes through the U.S. and Canadian Great Lakes Binational Toxics Strategy.

The EPA study—called the "Dioxin Reassessment"—still remains a draft, which has stymied the agency's development of federal regulations for over 15 years. Evidence has accumulated since EPA began its reassessment in 1988 that dioxins cause many other health problems even at low levels, including cancer, developmental problems in children, immunologic problems in children and adults, reproductive problems in adults, and diabetes.

In 1985, EPA concluded that there was an increased cancer risk in humans at dioxin exposure levels lower than had been estimated by any government agency anywhere in the world. Dioxin is the most potent carcinogen ever evaluated by the agency. Scientists at EPA have long concluded dioxins and dioxin-like compounds are highly toxic, but a strong coalition of industries responsible for generating dioxins as a by-product of production and disposal have successfully stalled the completion of this health assessment report for over 15 years. Chlorine-based industries have demanded reviews, reassessments and re-analyses. Each re-assessment and review affirmed the findings and newer scientific data continues to strengthen the conclusions that dioxins are a serious public health threat. Most recently, the National Academies released a 2006 report confirming what numerous scientific panels have concluded: dioxin is a potent cancer-causing chemical. The chlorine-based industry is following the tobacco industry's strategies to keep information from the public and delay release of the report. Enclosed is a document that summarizes these delays.

While panels are convened, people in communities across the country are continuing to be exposed to this highly toxic chemical. Many state regulating agencies have ignored dioxin contamination and risks because of the lack of a final health assessment from the EPA. Dioxin contamination is particularly high in areas with dioxin sources like incinerators, smelters, pulp and paper mills, chemical factories or other industries that use chlorine. These dioxin sources are predominantly located in low-income communities of color, making this a major issue of environmental justice and racism. The disposal of polyvinyl chloride (PVC) plastic is the largest source of dioxin-forming chlorine in solid waste. PVC is the leading contributor of chlorine to four combustion sources— municipal solid waste incinerators, backyard burn barrels, medical

waste incinerators and secondary copper smelters—that account for an estimated 80% of dioxin air emissions. Residents living near PVC chemical plants in Mossville, LA had three times more dioxin in their blood than the average U.S. citizen. Dioxin has been found at hundreds of Superfund toxic waste sites. It was a contaminant at the Love Canal landfill in NY where over 900 families were relocated and in Agent Orange, the herbicide sprayed in Vietnam that resulted in major health impacts for Vietnam Veterans. Dioxins have been found in milk, cheese, beef, pork, fish, chicken, birds, deer, turkey, squirrel, and worms, as well as soil and sewage sludge.

In your January 23<sup>rd</sup> letter to EPA employees, you stated that, *“Science must be the backbone for EPA programs. The public health and environmental laws that Congress has enacted depend on rigorous adherence to the best available science... More than 30 years after Congress enacted the Toxic Substances Control Act, it is clear that we are not doing an adequate job of assessing and managing the risks of chemicals in consumer products, the workplace and the environment. It is now time to revise and strengthen EPA’s chemicals management and risk assessment programs.”* The dioxin reassessment’s delays are a perfect example of the need for scientific integrity and an overhaul of EPA’s chemicals management and risk assessment programs.

**We request that you cancel the unnecessary review and release the Dioxin Reassessment so that the EPA and others can move forward in developing protective dioxin policies and standards.**

**We also request the opportunity to meet with you to discuss this further. To schedule a meeting, please contact Mike Schade at CHEJ: (212) 964-3680 / [mike@chej.org](mailto:mike@chej.org)**

Thank you for your attention to this critical environmental health and justice issue.

Sincerely,

Lois Gibbs, Executive Director  
Center for Health, Environment and Justice

William Preston Bowling  
ACME Aerospace Cancer Museum of  
Education

Pamela K. Miller  
Alaska Community Action on Toxics (ACAT)

Laura Abulafia  
American Association on Intellectual and  
Developmental Disabilities (AAIDD)

Laura & Mike Hofmann  
Barge Park Pals

Louis Zeller, Community Organizer and  
Science Director  
Blue Ridge Environmental Defense League

Janet Nudelman, Director of Program and  
Policy  
Breast Cancer Fund

Rev. Charles Lord  
Caney Fork Headwaters Association

Andrew Kimbrell, Executive Director  
Center for Food Safety

John Stauber  
Center for Media and Democracy

Glenn Wiser, Senior Attorney  
Center for International Environmental Law

Lenny Siegel, Executive Director  
Center for Public Environmental Oversight

Ellen Meeks Rendulich  
Citizens Against Ruining the Environment

Christina Walsh, Founder/Director  
cleanuprocketdyne.org

Bev Thorpe  
Clean Production Action

Lynn Thorp  
Clean Water Action

Davis Baltz  
Commonweal

Ralph Ryder, Coordinator  
Communities Against Toxics

Sarah Anker, Executive Director  
Community Health and Environment  
Coalition

Chris Borello, President  
Concerned Citizens of Lake Twp.

Mark A. Mitchell M.D., MPH, President  
Connecticut Coalition for Environmental  
Justice

Rev. Walter Stark  
Cumberland Countians for Peace & Justice

Scot Quaranda  
Dogwood Alliance

Downwinders At Risk

Tracey Easthope  
Ecology Center

Bob Spiegel, Executive Director  
Edison Wetlands Association

Barbara Kyle, National Coordinator  
Electronics TakeBack Coalition

Judy Braiman  
Empire State Consumer Project  
RAMP(Rochesterians Against the Misuse of  
Pesticides)

Max Muller, Program Director  
Environment Illinois

Judith Robinson, Director of Programs  
Environmental Health Fund

Peter Montague, Ph.D., Director  
Environmental Research Foundation

Jeannie Economos, Pesticide Safety and  
Environmental Health Project Coordinator  
Farmworker Association of Florida

Teresa Niedda, Director  
Farmworker Health and Safety Institute

Katherine Bourbeau  
Finger Lakes Zero Waste Coalition

Neil Tangri  
GAIA

Charlotte Wells  
Galveston BAYKEEPER

Denny Larson, Executive Director  
Global Community Monitor

Daniel Parshley, Project Manager  
Glynn Environmental Coalition

Laura Weinberg, President  
Great Neck Breast Cancer Coalition

Marnie Glickman, Executive Director  
Green Change

Tyson Miller  
Green Press Initiative

Michael Heimbinder  
HabitatMap

Paul Bogart  
Healthy Building Network

Christopher Gavigan  
CEO / Executive Director

Healthy Child Healthy World

Debra Hall, Founder  
Hopewell Junction Citizens for Clean Water

Lin Kaatz Chary, PhD, MPH  
Indiana Toxics Action

Aimee Boulanger, Program Director  
Institute for Children's Environmental Health

Tom FitzGerald, Director  
Kentucky Resources Council, Inc.

Tessa Hill, President  
Kids for Saving Earth

Michelle Hurd Riddick  
Lone Tree Council

Mary Brune, Co-founder & Director  
MOMS - Making Our Milk Safe

Anne Hedges, Program Director  
Montana Environmental Information Center

Donald B. Clark  
Network for Environmental & Economic  
Responsibility – United Church of Christ

Niaz Dorry  
Northwest Atlantic Marine Alliance

Diane D'Arrigo, radioactive waste project  
Director  
Nuclear Information and Resource Service

Laura Haight  
NYPIRG

Ronnie Cummins, Director  
Organic Consumers Association

Whitney Merchant  
Pesticide Free Zone

Stop the Spray Marin  
Sustainable San Anselmo

E.M.T. O'Nan, Director  
Protect All Children's Environment

Annie Leonard  
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Kathy Henry  
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Stephanie Smolen  
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Jessica Edgerly, Community Organizer  
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Safety and Health

Matthew Koehler, Executive Director  
WildWest Institute

Tracy Lakatua, Executive Director  
Women's Voices for the Earth

Suzanne Murphy  
Worksafe

**Enclosures:** EPA Science Advisory Board 2001 letter to EPA Administrator Christine Whitman  
History of Dangerous Delays on Dioxin Protective Policy