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

March 29, 2010

Re: EPA Draft Recommended Interim Preliminary Remediation Goals for Dioxin In Soil at CERCLA and RCRA Sites: docket ID number: EPA-HQ-SFUND-2009-0907

Dear EPA Administrator Jackson:

We thank you for the attention EPA has given to the Dioxin Reassessment over the past year. On behalf of workers impacted by Dioxins, and local, regional and national labor organizations, we are writing in regards to the EPA's Draft Recommended Interim Preliminary Remediation Goals (PRG's) for Dioxin in Soil at CERCLA and RCRA sites.

We commend EPA for developing interim preliminary remediation goals for Dioxins. We urge EPA to continue this process by revising the PRGs and finalizing them as remediation goals in a timely manner. In relation to the proposed PRG's, we offer the following comments and recommendations.

EPA must base the PRG's for Dioxins on both cancer and non-cancer effects. We are extremely concerned that the EPA is proposing a commercial/industrial PRG that is based *only* on non-cancer health effects which does not adequately protect workers from the risk of developing cancer. This is unsafe given that Dioxin has been classified as a known human carcinogen by the World Health Organization's International Agency for Research on Cancer and the U.S. Department of Health and Human Services' National Toxicology Program. The human epidemiological evidence provides consistent findings of increased risk for all cancers combined and lung cancer in occupational studies as well as evidence of tissue specific increases in cancer. Increased mortality from soft-tissue sarcomas and all cancers among workers exposed to dioxin has also been reported. Dioxin is also generally considered the most potent man-made carcinogen ever tested.

Another problem with the commercial/industrial PRG for Dioxins is that at 950 ppt, it is significantly higher than the proposed "residential" level of 72 ppt. This PRG fails to protect workers and sensitive populations from exposure to Dioxin, and ignores Dioxin's cancer risks. Workers at remediated commercial and industrial sites will be exposed to unsafe levels of dioxin in the soil and dust. We strongly recommend that EPA set a health-protective commercial/industrial PRG for Dioxins that follows your agency's cancer risk guidelines and is based on both cancer and non-cancer health effects. **Therefore, we strongly urge EPA to adopt your proposed alternative PRG for Dioxins at 17 ppt TEQ for commercial/industrial soil, which would be protective for both cancer and non-cancer effects.**

To protect the health of American workers, EPA needs to adopt a PRG for Dioxins of 17 ppt TEQ for industrial/ commercial use which would be protective for both cancer and non-cancer effects.

Thank you for your attention to this critical labor and environmental justice issue. We appreciate the opportunity to comment on this important matter.

Sincerely,

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