



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
NATIONAL CENTER FOR ENVIRONMENTAL ASSESSMENT
WASHINGTON, DC 20460

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OFFICE OF
RESEARCH AND DEVELOPMENT

Terry Miller, Chair, Lone Tree Council
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Tracey Easthope, Director, Environmental Health Project
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Lis Wozniak, Executive Director, Michigan LCV
Rita Jack, Sierra Club, Mackinac Chapter
Chris Kolb, President, Michigan Environmental Council
Ted Schettler, Science and Environmental Health Network

Dear Ladies and Gentlemen:

Thank you for your comments on the recently released summary report concerning the University of Michigan Dioxin Exposure Study (UMDES). I have been asked to respond to your February 1, 2011, letter to U.S. Environmental Protection Agency (EPA) Administrator Lisa Jackson. This response was developed in close collaboration with EPA Region 5.

The EPA continues to be concerned about the potential human health and environmental impacts of dioxins in the Tittabawasee River and surrounding floodplain. The UMDES summary report presents no findings that change the EPA's commitment to area residents or the requirements for Dow to continue its work. EPA's actions are based upon an assessment of potential risks whereas the UMDES is an observational exposure study and does not assess or estimate risks to human health. Any communication regarding the results of this study should not be interpreted as affecting the need for cleanup.

The EPA has read the updated UMDES summary report. While some new findings have been identified by the UMDES, they do not change the primary conclusions of EPA's 2009 review of the study. We do not see a need to update or revise the EPA review report. The UMDES remains one of the largest studies of its kind, with a design that is well suited to identify patterns of dioxin, furan and PCB levels in the blood of adults. The study estimates the distributions of dioxin concentrations in blood, soil and dust in the Midland and Tittabawasee River regions. However, EPA maintains that the study is limited since it did not adequately include subpopulations likely to have larger exposures. For example, the study did not include children, who generally have higher exposures to contaminants due to activities that increase their contact with and ingestion of soils and dusts. Additionally, the study did not sufficiently focus on individuals living on properties with highly contaminated soils or those consuming

large amounts of local fish or game. Such a focus would have been informative to area decision-makers.

The EPA is committed to transparency and will continue to engage with the communities surrounding Midland and the Tittabawasee River. We are evaluating available community engagement mechanisms (fact sheets, public meetings, etc.) to determine the best way to communicate potential risks and clean-up progress to those communities.

Thank you again for sharing your concerns with us. We look forward to your continued engagement and dialogue.

Sincerely,

A handwritten signature in black ink that reads "Rebecca Clark". The signature is written in a cursive style with a large initial "R" and a long, sweeping underline.

Rebecca Clark
Acting Director

cc: Mathy Stanislaus, EPA
Robert Sussman, EPA
Susan Hedman, Administrator, Region 5
Mary Logan, Region 5
Brigid Lowery, OSWER
Kecia Thornton, OSWER
Michelle Crews, OSWER