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U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
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Re: Draft Recommended Interim Preliminary Remediation Goals for Dioxin in Soil at CERCLA and RCRA Sites

Dear Dr. Stanislaus:

Thank you for keeping your promise and releasing the draft recommended interim preliminary remediation goals for the cleanup of the carcinogen dioxin in soil.

EPA completed its first comprehensive review of the health effects of dioxin in 1985. In 1995, the EPA released a draft reassessment report finding that the cancer risk to humans from dioxin exposure was by far the highest defined for any chemical by any government agency anywhere in the world. Subsequent research and scientific reviews have only added to our understanding of the extreme toxicity of dioxin. Yet remarkably, the reassessment report has yet to be completed. After 25 years of study, it is about time that EPA made a decision to move remediation goals forward. I know that New York State struggled with this very question in my former neighborhood, Love Canal in 1978.

I have two very immediate comments about the, "**DRAFT RECOMMENDED INTERIM PRELIMINARY REMEDIATION GOALS FOR DIOXIN IN SOIL AT CERCLA AND RCRA SITES.**" The Center for Health, Environment & Justice will be submitting additional detailed comments before the close of the comment period.

In the draft recommendation, the U.S. Environmental Protection Agency proposed new preliminary remediation goals for:

- Residential areas at 72 parts per trillion (ppt), down from 1,000 ppt.
- Commercial/Industrial areas at 950 ppt down from the range of 5,000-20,000 ppt.

Additionally, the draft report makes it clear that the proposed PRG for dioxin in soil based on a generally acceptable one-in-a-million cancer risk is 3.7 ppt TEQ.

First, I cannot understand how EPA can scientifically support its decision to propose remediation goals of 72 ppt for residential use and 950 ppt for commercial/industrial use when the generally accepted cancer exposure level is only 3.7 ppt. You must lower the residential standards and adjust the commercial/industrial standards to reflect this reality. It is clear in your draft report that the 72 ppt preliminary remediation residential goal was for non-cancer health risks and that in deriving this number you completely ignored the cancer health risks. Small children and pregnant women will likely be a percentage of the population that will be residing in any remediated residential areas.

Secondly, it is of great concern that the commercial/industrial levels are so high. Workers in buildings built on such property will be exposed well beyond the acceptable levels for cancer risk.

As EPA knows well, many public schools are unfortunately being built on historically contaminated land including Brownfield sites. Property often purchased by public schools was once categorized as commercial property which if contaminated by dioxin, will only be remediated to 950 ppt. There are no laws prohibiting schools from be built on such property. In fact a number of public schools have been buildt on Superfund and Brownfield sites. Young children attending school or frequenting the playgrounds would be placed in serious danger. And, even if the site was cleaned up to 72 ppt, that level would still pose serious cancer risks to young children.

Additionally, many remediated areas are often used for community parks and playgrounds, which again would pose unhealthy risks to young children and parents.

The proposed levels of dioxin remediation must more accurately reflect the cancer risks especially in light of future land use possibilities of parks, playgrounds, daycare center or schools.

Respectfully submitted,

A handwritten signature in black ink that reads "Lois Marie Gibbs". The signature is written in a cursive, flowing style.

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