



December 17, 2009

**Via E-Mail**

Patricia Krause  
Superfund Community Involvement Coordinator  
US EPA Region 5  
77 W. Jackson Blvd. (SI-7J)  
Chicago, IL 60604-3590

Dear Ms. Krause:

The Chlorine Chemistry Division (C2) appreciates this opportunity to comment on the *Administrative Settlement Agreement and Order on Consent for Remedial Investigation, Feasibility Study and/or Engineering Evaluation and Cost Analysis, and Response Design* (AOC). C2 is a business council of the American Chemistry Council, and strives to ensure appropriate product stewardship of chlorinated chemicals. As part of its mission, C2 addresses important science and public policy issues related to chlorine chemistry.

With regard to the AOC's Statement of Purpose, C2 fully agrees that "appropriate, previously collected data," plays an important role in helping to determine the "nature and extent of contamination and any current or potential threat to the public health."<sup>1</sup> In this regard, C2 urges EPA to amend the AOC to explicitly reference the University of Michigan Dioxin Exposure Study (UMDES) as an example of "appropriate, previously collected data."

Importantly, the UMDES is one of the largest and most relevant studies concerning the impact of dioxins in soil and dust on human dioxin body burdens.<sup>2</sup> The UMDES included 946

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<sup>1</sup> AOC at 3.

<sup>2</sup> Independent scientists at the University of Michigan conducted the UMDES. To help ensure objectivity and scientific integrity, the study authors reported directly to an independent Science Advisory Board that oversaw all aspects of the study, including study design and implementation. Members of the SAB are highly respected and extremely knowledgeable concerning epidemiological design, sampling, and dioxin and dioxin exposures. <http://www.sph.umich.edu/dioxin/scientific-advisory-board.html>



