

From: [Evans, Elizabeth - DHFS](#)
To: [Great Lakes \(CDC\); Frumkin, Howard \(CDC/CCEHIP/NCEH\);](#)
cc: [Anderson, Henry <WI> \(CDC dhfs.wisconsin.gov\); Nehls-](#)
[Lowe, Henry L - DHFS; Thiboldeaux, Robert L - DHFS;](#)
[Rheineck, Bruce D - DHFS; Maloney, Jessica J - DHFS;](#)
Subject: WI Comment on ATSDR 2008 AOC Report
Date: Monday, June 30, 2008 7:55:34 PM
Attachments: [WI Comments on ATSDR AOC report 063008.pdf](#)

Please find attached comments from Wisconsin regarding the ATSDR 2008 AOC Report.

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From: Anderson, Henry A - DHFS
Sent: Monday, June 30, 2008 11:37 AM
To: Evans, Elizabeth - DHFS; Nehls-Lowe, Henry L - DHFS
Cc: Otto, William H - DHFS
Subject: RE: WI letter on ATSDR AOC Report

Please convert this to pdf and send via e-mail to the feg reg site as well as to Howie at CDC.

Andy

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June 30, 2008

Dr. Howard Frumkin, MD, DrPH
Director
Agency for Toxic Substances and Disease Registry
1600 Clifton Road, NE
Atlanta, Georgia 30333

Dear Dr. Frumkin:

On behalf of the Wisconsin Department of Health and Family Services (DHFS), I am submitting comments on ATSDR's public comment draft 2008 report *Selected Information on Chemical Releases within Great Lakes Counties Containing Areas of Concern (AOC)*.

Overall, this public comment AOC report addresses the major concerns that DHFS previously expressed to you regarding the unanticipated release last year of the draft report *Public Health Implications of Hazardous Substances in the Twenty-Six U.S. Areas of Concern*. DHFS' concern with this prior draft report was primarily its overly broad scope and failure to appropriately address the specific request from IJC to ATSDR, which was "evaluating the public health implications of environmental contamination in Great Lakes AOCs by providing information on ATSDR's public health assessments of hazardous waste sites within these AOCs."

This public comment AOC report is the first document that accurately and comprehensively compiles available data on environmental contamination in the Great Lakes' Area of Concerns. The public comment AOC report accurately acknowledges the limitations of the available environmental data, and that it only provides a "partial picture" of critical pollutant exposures to residents and visitors to the Great Lakes basin. It also recognizes the lack of health data that would allow an appropriate assessment of how this contamination is directly impacting the public.

DHFS concurs with the five principal conclusions in the public comment AOC report. Additionally, it might be useful for the report to more clearly point out that the AOC concept is community based and much more holistic in its conceptual framework than the ATSDR Site Assessment information, which is localized to the immediate area of a site. The same is true for the environmental measurement data presented. Thus a site impact could be significant to a small area, but have only a minimal impact on the larger AOC community. It needs to be pointed out clearly that the data used in the report was not collected for the purposes of a community-wide health impact assessment or to identify

the highest environmental health priorities for each AOC. These are not done to assess the cumulative health impact of multiple sites and exposures. Therein lies the problem. We are being asked, “What can/should an AOC do?” DHFS believes that a community-wide environmental health impact assessment approach warrants consideration and thoughtful discussion. However, it is not a simple task. We suggest that the report add a recommendation (or a commitment) that ATSDR and IJC jointly convene a workshop that will develop a strategic plan to address the data and information gaps identified in the public comment AOC report and move the Great Lakes Region’s AOCs toward a strategy to respond to their continuing challenges.

We look forward to working with you on developing the “next steps.”

Sincerely,

Henry A. Anderson, MD
Chief Medical Officer
Wisconsin Division of Public Health