

PEER REVIEW COMMENT FORM

UPDATED ATSDR POLICY GUIDELINE FOR DIOXINS AND DIOXIN-LIKE COMPOUNDS IN SOIL

October 2004

GUIDE TO REVIEWERS:

The objective of peer review conducted by the Office of Science is to ensure the highest quality of science for NCEH/ATSDR policy, studies, and results of research; therefore, your comments should be provided with this goal in mind. Please note that your unaltered comments will be sent to the investigator for a response. You should receive a copy of the response to the peer review comments when they are available.

Please comment on the three (3) major changes to the dioxin and dioxin-like revised policy:

1. Change #1

Deletion of the 1ppb Action Level as the criteria for taking specific public actions, and retained only as a reference to the Superfund Dioxin Cleanup policy criteria.

Comments: Very disconcerting. In -- this could/should trigger review of dozens of clean-ups requiring re-analysis of thousands of pieces of soil sampling data. This also leaves the incorrect impression that sites cleaned previously are still risky. Based on a number of published studies of -- and -- there has been almost no relationship found between exposure with documented body burdens and any health effects (see comments in body of draft document)

2. Change #2

Retention of the 0.05 ppb Screening Level, the MRL-based EMEG for dioxin TEQ in soil, to be consistent with the approach for evaluating chemical contaminants in health assessments.

Comments: OK. Just don't drop the 1ppb "action" level. Dr. Renate Kimboroughs statement as quoted on p.5 has been incorrectly used by EPA and others as a simple trigger level to 1. begin clean up and 2. to consider a site "clean." Neither is correct. I was present at the meeting when Morris Kay (EPA VII administrator) first decided to use this "action" level as a clean-up level even after Dr. Kimborough explained her thoughts to him. He made the decision as a practical way to get to work and end the studying. I believe 1ppb is quite

protective for the vast majority of persons possibly exposed through soil ingestion or inhalation. See my comment to change #1, above.

3. **Change #3**

Indirect exposure pathways, such as local dietary sources, could make a significant contribution to the overall dioxin exposure. As a result the guideline emphasizes the need for conducting a complete exposure pathways analysis for dioxins and dioxin-like compounds in site-specific health assessments.

Comments: OK and important IF those exposure pathways are completed for newly discovered or un-remediated sites. It is not beneficial for remediated sites that used the 1ppb action level as a clean-up level. But see comments in body of document re: analytical limits.

Additional questions and comments:

1. Does the revised document serve as effective guidance for assessing potential public health hazards associated with dioxin contamination in soil?

Yes () No (X) Unsure ()

Why?: Not unless health assessors use common sense (see comment below).

2. Do you have any other comments regarding the revised dioxin and dioxin-like policy guideline?

Seems to me the problem isn't guidance, but as stated on p.1 last sentence, the "interpretation" of that guidance. Maybe persons using the guidance are not qualified to interpret it. Or, perhaps they are using their interpretation to further agendas not based on risk, but based on personal bias or ease of deferring to public pressure to rationalize "why bad things happen to good people."