



JENNIFER M. GRANHOLM
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING



STEVEN E. CHESTER
DIRECTOR

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Letter to the Editor
The Detroit News
615 West Lafayette
Detroit, MI 48226

Dear Editor:

In his June 24, 2004 guest editorial, Mr. Doug Roberts, Jr. of the Michigan Chamber of Commerce, charges the Department of Environmental Quality (DEQ) with launching "a vague, ill-conceived plan" to address dioxin contamination based upon "a lack of facts and disregard for sound science." How unfortunate that a representative of one of Michigan's most prestigious members of the business community must rely on sound bites, and convey inaccurate and misleading information, in the public debate over one of the most significant policy issues facing Michigan today.

The facts are these: data gathered by both the U.S. Environmental Protection Agency (EPA) and the DEQ demonstrate dioxin contamination in Midland soils, sediments of the Tittabawassee River, and in soil on properties along the River. No one knows precisely how many properties are contaminated or at what levels. What we do know is that some properties are contaminated at levels which pose a public health risk as defined by the Michigan Legislature. The contamination of the River sediments has been shown to be harmful to fish and animals. We also know that The Dow Chemical Company (Dow) caused the dioxin contamination. As such, under both federal and Michigan law, Dow is responsible to address that contamination.

The level of dioxin contamination in the Midland area that some would declare "safe" poses ten times more risk to public health than the current standard derived under Michigan law. Of the states that have derived safe levels of dioxin in soil, seven are lower than Michigan and two are only slightly higher. None would find acceptable the levels of dioxin found in some Midland area and Tittabawassee River floodplain soils. Recent work conducted by the International Agency for Research on Cancer, the World Health Organization, the United Nations Food and Agriculture Organization, the European Commission Scientific Committee on Food, and in EPA's draft dioxin reassessment supports even lower standards.

And just what is this "vague, ill-conceived plan" with which the DEQ is charged? Consistent with federal and state law, Dow must undertake four basic actions: First, take immediate steps to reduce the highest risks where, for example, children—the most susceptible segment of the population—have the greatest chance of being exposed to the highest levels of dioxin contamination. Second, help people living in the Midland and Tittabawassee River areas understand what steps they can take to reduce the risk of dioxin exposure. Third, map where dioxin contamination exists in the area and at what levels. Finally, based on the studies and

evaluations that will certainly take a year or more, develop and conduct a long-term plan to address dioxin contamination above levels considered safe. The DEQ and Dow are currently engaged in productive discussions on each of these objectives.

It is said that even this fundamental and reasonable approach is unwarranted because there is "no evidence" of anyone in the Midland area getting sick from dioxin. However, this is not because an illness has not occurred but because of the scientific rigors necessary to pinpoint the precise cause behind a given individual's illness. The U.S. Department of Health and Human Services, the National Institute for Occupational Safety and Health, and the World Health Organization's International Agency for Research on Cancer, as well as the EPA, have concluded, based on literally hundreds of animal and human studies, that dioxin is a potent human carcinogen. The DEQ is doing no more than responding to what the dictates of law and weight of scientific evidence require.

Environmental contamination can surely pose significant public health and environmental concerns. Michigan needs a system of government that supports a healthy environment and economic enterprise. Balancing these concerns in the context of dioxin contamination in the Midland area will undoubtedly have important implications for that area and the entire state of Michigan. To suggest that the DEQ is acting arbitrarily and relying on invalid science in this matter does a disservice to both.

Sincerely,

Steven E. Chester
Director

Link to Detroit News Article: <http://www.detnews.com/2004/editorial/0406/24/a15-193153.htm>