

B. Buell
Harris
File Doc 14 St

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

DATE: OCT 18 1983

SUBJECT: Draft Dioxin Strategy ---- As Transmitted October 12, 1983

FROM: Valdas V. Adamkus
Regional Administrator

TO: Steven Schatzow, Director
Office of Water Regulations and Standards

In response to your October 12, 1983 note, I offer the following brief comments on the subject document with the request that they be read together with the more extensive comments that we provided on September 12, 1983.

1. Need to Reconsider the Emphasis on 2, 3, 7, 8 - TCDD - My previous memo indicated our concerns with the strong emphasis on 2, 3, 7, 8 - TCDD based in large part on our experience in Midland where a more complete data set and explicit concerns about other isomers and chemicals dictate a more extensive analytical program. Other sites where dioxin is found will likely demand the same sort of attention. Ultimately, I expect we will spend more time and money by taking a more narrow approach in the beginning.
2. Need to augment the Midland Program - The continuation of the 2, 3, 7, 8 - TCDD emphasis nationally places the Midland effort in a class of one, making it more difficult to draw comparisons between sites and raising concerns among residents that the city is being unfairly singled out. It would be more useful to Midland area residents and generally more effective in the long run for the Agency to do extensive chemistry at a broader number of sites now. The matter could be handled in the strategy by providing more flexibility in the design of site studies through changes in language in places like Part 1, page 2 and Part 2, items 39, 40 and 49. It should be stated (suggested language attached) that several studies with more extensive chemistry are to be conducted at Midland and several other sites to be selected.
3. Need to Improve the Long Term Efficiency of the Effort - While more extensive chemistry at a limited number of sites would assist our efforts at Midland, this alone will not be sufficient to realize the potential efficiencies and cost savings. A program is needed that will optimize the chemistry for each sampling program, not only for dioxin, but for the many other chemicals for which EPA has regulatory responsibility. Some thoughts for improving the overall efficiency of the program are as follows:

Suggested Language Changes

- In Part 1, page 2 replace the sentence beginning on line 20 with; "The 2, 3, 7, 8 - TCDD investigation will be augmented by analyses for other dioxin isomers and other chemicals at Midland, Michigan, and a limited number of other sites to be selected."
- In Part 2, item 26, delete the word "limited" on the 2nd line.
- In Part 2, item 39, the last sentence should read: "Followup investigations at contaminated sites may require soil analyses at the ppt detection limit and for other isomers and chemicals, depending on the circumstances of contamination and potential for human exposure."
- In Part 2, item 40, add the sentence: "Analyses of other isomers and chemicals will be performed, when necessary, at a number of sites as a control for investigation of Tier 1, 2 and 3 sites."
- Replace Part 2, item 49 with;
 - "Analyses of other chemicals, in addition to 2, 3, 7, 8 - TCDD, may be necessary at certain sites. While the National Dioxin Strategy principally focuses on Dioxins, analyses for other chemicals of concern on a site-specific basis are appropriate and can be completed to make cost-effective use of field and laboratory resources. In some cases, depending upon the types of chemical manufacturing facilities and combustion sources present at a site, it may be appropriate to analyze for other dioxin isomers, dibenzofurans and other related toxic chemicals such as PCBs, chlorinated phenols, and chlorinated benzenes."
- In Part 2, item 47, add the sentence: "Higher priority may be given to some tier 7 samples if needed as controls for studies of tier 1 and 2 sites."

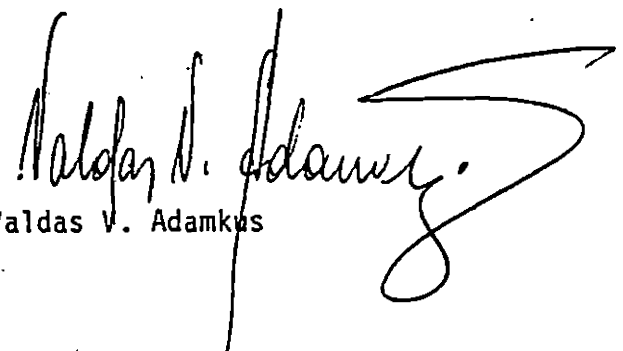
a. Build additional flexibility into the strategy to allow regions to design additional chemical analyses into their site investigations and to lower detection limits as may be justified on a site-by-site basis.

b. Take notice of the extensive amounts of dioxin data already being generated by States and other entities. Such data should be utilized in establishing further fish sampling networks, making regional reports on sites, and should be well known to the Dioxin Sample Control Center.

4. Need to get the Dioxin Strategy out on the street - The national strategy is a subject of intense interest among the States, for members of the public in general, and for the citizens of Midland in particular. We much appreciate the yeoman efforts you and your staff are making on the document and strongly urge its early publication.

Please refer to the attachment and our September 12, 1983 memorandum for additional specific comments. Thank you once again for the opportunity for review. If you have questions on these further comments, please contact Dave Stringham at FTS 8/886-7579 or Jon Barney at 8/886-6109.

cc: A. Alm
B. Hedeman
G. Lucero
M. Cook
H. Wiser
D. Clay
D. Dewling
M. Kay
A. McBride
M. Slimak


Valdas V. Adamkus

4/89068

1. The first group of people who are not in the majority are the people who are not in the majority.

1992

1. The first step is to identify the problem or question that needs to be answered. This involves understanding the context and the specific requirements of the task.

100