

Another concern of ours is what will happen to all of the rinse material used to clean tanks and machinery? If this material is combined with the total waste you are diluting the waste to lower the concentration. This practice is illegal.

Another concern, especially for the test taking place soon in Montana, is that higher dioxins and furans will be dechlorinated to produce some of the more toxic lower dioxins and furans. I have seen some papers in the literature that show that photolysis dechlorination causes this to happen. Thus it is important that we at Greenpeace get to view all of the data (before and after) for all of the different isomers.

In light of the many remaining questions about dioxin formation and detoxification, Greenpeace recommends the following:

1. Revoke all statements about making dioxin "safe". So far EPA has not determined a safe level. To say so now is to refute a mountain of documents that say otherwise.
2. Do not incinerate the remaining waste! Incineration may create more dioxins and furans. Store it in the most stable method available.
3. Continue to experiment with detoxification technologies.

We expect an answer to our concerns. Please respond and feel free to call if you have any questions regarding these concerns. We appreciate any attempt to alleviate toxic loading to the environment, but we will not appreciate attempts to snow the public with a technological game which has few if any environmental rewards.

Sincerely,



James Puckett  
Toxics Director

cc: Ron Versoni, EPA  
Bob Robichaux, EPA  
Greg Wingard