

GREENPEACE

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Carol
check this out.
Some of your ideas
I put out there

July 20, 1986

Bob Courson
Region X, EPA
1200 6th Ave
Seattle, WA. 98101

— JF
Notice the invaluable
reference.

Dear Mr. Bob Courson,

I hope you will consider the following, questions, comments and recommendations from Greenpeace regarding the possible detoxification of 2,3,7,8-TCDD dioxin at Western Processing. I was unable to attend the briefing session in Kent, but have gotten a good run down of the process from my colleague Greg Wingard.

My first and primary concern is regarding the 1 part per billion (ppb) level being deemed as "safe". According to the headlines of the Seattle Post-Intelligencer, the EPA claims they can now make dioxin "safe". The 1 ppb level is an entirely arbitrary figure having nothing to do with health and safety or science whatsoever. I enclose for you a document recently obtained through the Freedom of Information Act that clearly states that the 1ppb level was invented solely to facilitate action and keep down costs of cleanup at certain dioxin contaminated sites, and is not based on total health protection. In fact, between the years of 1980 and 1982, EPA in three different consent decrees at Hyde Park, Syntex, and Vertac, the clean-up level was set at the detection limit. In the Hyde Park case Hooker Chemicals themselves expressed a great deal of concern about the toxicity of TCDD and recommended a 100 ppt action level.

Quoting from the enclosed memo, "The justifications requiring remedial action for TCDD-laden soil down to the detection limit has always been that TCDD is a potent carcinogen and that the prior exposure/risk assessments indicated that any level above the detection level presented an unacceptable risk." How then can a level of 1 ppb be considered "safe"?

You know and I know that the 1ppb level sought at the Western Processing site is only significant as it is the level at which disposal companies like Waste Management Incorporated are willing to take the stuff without suffering EPA retribution. The lowering of the dioxin concentration by one magnitude, hardly makes a dent in its total toxicity. And although it is an admirable experiment, hardly qualifies as a significant action. Remember, this is a substance that the EPA has gone on record saying is unacceptable in drinking water at a level of one part per quintillion (document enclosed).