



CAL DOOLEY
PRESIDENT AND CEO

December 20, 2011

Lisa P. Jackson
Administrator
U.S. Environmental Protection Agency
Ariel Rios Building
1200 Pennsylvania Ave., N.W.
Mail Code: 1101A
Washington, D.C. 20460

Dear Administrator Jackson:

As you are aware, this past Saturday Congress passed the "Consolidated Appropriations Act" (H.R. 2055), which included critical provisions to advance the scientific integrity of the U.S. Environmental Protection Agency (EPA) Integrated Risk Information System (IRIS) program. Under H.R. 2055, EPA is to implement the recommendations from Chapter 7 of the National Academy of Sciences (NAS) report on EPA's draft assessment of formaldehyde into the IRIS process, impacting not only new assessments but ongoing assessments as well. IRIS assessments that reflect the highest standard of scientific inquiry, as called for in H.R. 2055, are in the nation's best interests.

H.R. 2055 also directs EPA to include documentation describing how the NAS Chapter 7 recommendations have been implemented or addressed in all IRIS assessments released in Fiscal Year 2012. The documentation is to include an explanation for why certain recommendations were not incorporated. Thus, it is incumbent on EPA to fully explain how the IRIS assessment of dioxin comports with the NAS recommendations. To comply with Congress's direction, EPA should withdraw the dioxin assessment from interagency review and take the necessary steps to implement the NAS recommendations.

Despite EPA's long standing position to issue a complete dioxin assessment, the Agency dramatically changed direction in late August 2011. EPA now intends to issue the assessment in a piecemeal fashion, with non-cancer and cancer sections issued independent of one another and at different times. EPA's bifurcation of the dioxin assessment runs counter to the NAS recommendation that IRIS assessments evaluate all relevant health endpoints based on a weight-of-evidence evaluation. A failure to apply a weight-of-evidence approach also was evident in EPA's derivation of a Reference Dose (RfD) for dioxin. For example, EPA failed to consider the strengths and weaknesses of the underlying studies and whether these weaknesses affect the RfD determination.



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ACC supports the strong, scientifically sound regulation of dioxin and has worked to advance this in partnership with EPA. As EPA works to fully implement the NAS recommendations into the dioxin assessment, it is worth noting that the Agency's efforts to manage dioxin emissions have been successful. Indeed, as a result of both regulatory and voluntary initiatives, U.S. dioxin emissions from man-made sources have dramatically declined and environmental levels of dioxin have plummeted.

Thank you for your ongoing attention to this important matter. ACC looks forward to significant IRIS enhancements in 2012 and EPA's revised and unabridged dioxin assessment.

Sincerely,

A handwritten signature in black ink that reads "Cal Dooley". The signature is written in a cursive, slightly slanted style.

Cal Dooley

cc: Cass Sunstein
Paul Anastas
Rebecca Clark