



*Dow Dioxin Cleanup
Tittabawassee and Saginaw Rivers*

Comments on
Agreed Order on Consent
and Appendix A Work Plan

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TASC Background

- Technical Assistance Services for Communities
- EPA-sponsored program
- Independent services provided by E² Inc.
 - Community education
 - Technical document interpretation
 - Technical expertise
 - Guidance through Superfund process
 - ESC subcontractor to E² Inc.

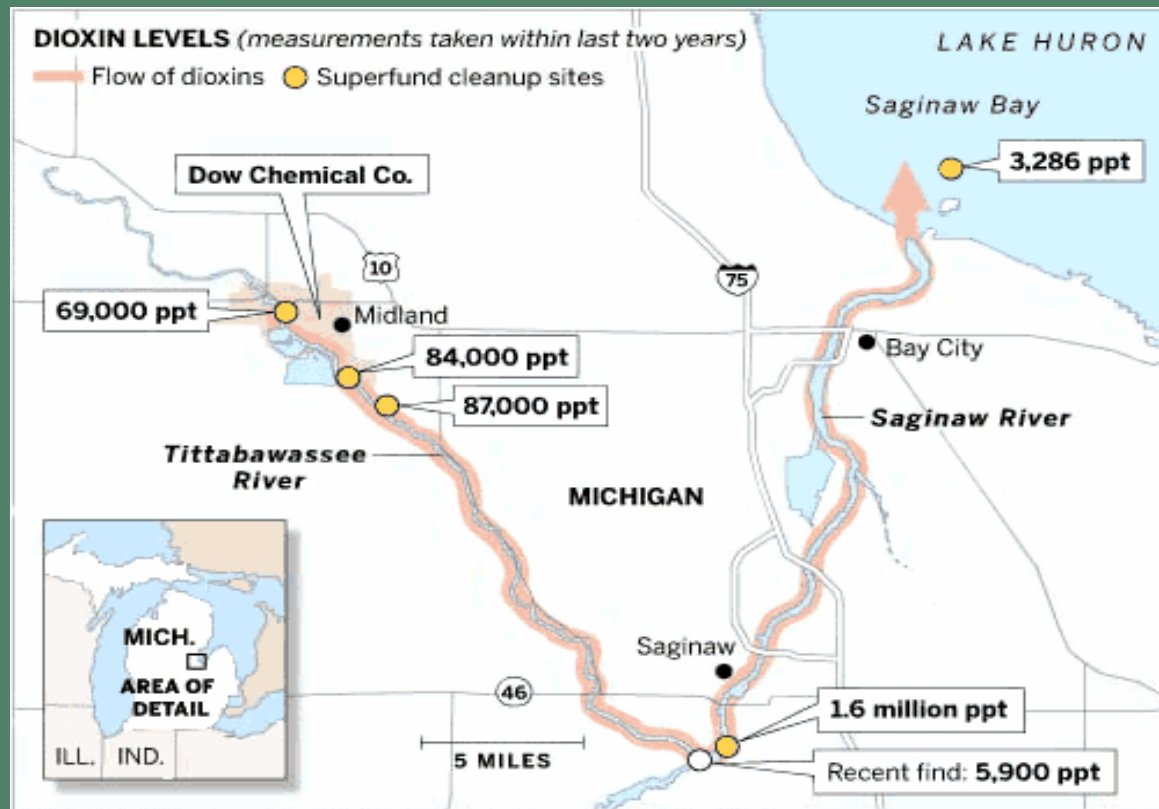


What are the AOC and Work Plan?

- AOC = Agreed Order on Consent
 - Legal agreement among EPA, MDEQ, Dow
- Work Plan
 - What sampling will be done?
 - And why?
 - How will agencies use the information?
- Dioxin-like chemicals and others



Where will the work be done?



Map of Dow dioxin contamination and various concentrations of the chemical along the waterways.

Modified from Michigan
Department of
Environmental Quality Map



How Can You Be Exposed to Dioxin?

Inhalation



Ingestion

Skin Contact





What Factors Determine Health Effects ?

- Means of exposure
- Dose (how much?)
- Duration (how long?)
- Other chemicals exposed to
- Family traits
- State of health



Important Issues

- AOC is quite similar to others that are in use successfully
- Change in ownership of any Dow property
- Work plan intends to cover all the way to Saginaw Bay
- Public participation is critical
- Public participation weak as described
- No stated required Data Gaps report
- Contaminant uptake is critical- but no details
- Need to include cumulative risk elements



Summary

- Elements of the AOC can be improved, i.e. public participation
- Only as good as the agencies are dedicated
- Accountability
- Specificity



For More Information

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