



THE UNIVERSITY OF MICHIGAN  
SCHOOL OF PUBLIC HEALTH  
DEPARTMENT OF ENVIRONMENTAL HEALTH SCIENCES

109 S. OBSERVATORY STREET  
ANN ARBOR, MICHIGAN 48109-2029  
PHONE: 734 764-3188 FAX: 734 936-7283  
WEB SITE: <http://www.sph.umich.edu/ehs/>

June 4, 2009

Lisa Jackson  
Administrator  
United States Environmental Protection Agency  
Ariel Rios Building, Mail Code 1101A  
1200 Pennsylvania Avenue, N.W.  
Washington, DC 20460  
Email: [jackson.lisa@epa.gov](mailto:jackson.lisa@epa.gov)

**RE: University of Michigan Dioxin Exposure Study and  
Dioxin contamination of the Saginaw Bay Watershed**

Dear Administrator Jackson,

We are very pleased to see that the EPA plans a careful review of the University of Michigan Dioxin Exposure Study (UMDES) and its potential role in addressing the dioxin contamination of the Saginaw Bay Watershed. We are committed to assisting your agency to facilitate this review.

In order to ensure that the review process will result in the best possible outcome for the protection of the environment and the public's health, it should include the following elements:

1. A thorough review of all the publicly available results from the UMDES. These include 15 peer reviewed publications, 106 posters and presentations at scientific meetings since 2006, and extensive summaries of the UMDES data. All of these materials are on our website ([www.umdioxin.org](http://www.umdioxin.org)) and can be downloaded. We would also be pleased to provide the EPA with a CD of all of these materials if it would be of use to you.
2. A meeting between the EPA scientists who are conducting this review and the UMDES scientists responsible for the study design, analyses, and conclusions.
3. An opportunity for the EPA scientists to review the original data in the UMDES study if necessary in order to address concerns about the data. The EPA would need to sign an agreement consistent with the NIH-issued Certificate of Confidentiality to maintain the confidentiality of the individual study participants.
4. Written comments from the EPA to the UMDES regarding any criticisms or deficiencies identified, and additional analyses that are needed.
5. An opportunity for the UMDES scientists to respond to these comments and to perform the additional analyses that might be needed.

6. Consideration of the UMDES response to EPA's comments prior to EPA's finalization of their comments.

We believe that if you have any questions or concerns about the study, it is in the best interest of all stakeholders that there will be an open exchange that will help clarify issues prior to the issuance of a report by the EPA. Given the tight timeframe announced in your letter (that this review will be concluded by Sept. 30) it is important that questions and concerns be communicated to us soon so that there is adequate time for their consideration and communication between the EPA reviewers and our staff.

Sincerely,



David H. Garabrant, MD, MPH  
Emeritus Professor  
Occupational Medicine & Epidemiology



Alfred Franzblau, MD  
Professor of Occupational Medicine