

March 24, 2004

David Garabrant, MD, MPH  
Professor of Occupational Medicine  
The University of Michigan  
School of Public Health  
1420 Washington Heights  
Ann Arbor, MI 48109-2029

Dear Dr. Garabrant:

Thank you for allowing the Saginaw County Department of Public Health to participate in the March 23<sup>rd</sup> teleconference regarding dioxin. The following are issues of concern that remain unresolved:

1. Funding from Dow is considered a potential source of bias/influence. This concern remains a theme of the environmentalist groups as represented by members of the Ecology Center and the Lone Tree Council. This is a potential concern in any industry-funded research and it has traditionally been overcome by the reputation, credibility, and integrity of the research institution involved. In our experience, the University of Michigan's (U of M) reputation, credibility, and integrity is above reproach. Nevertheless, it remains a concern to others. At the last videoconference, Dr. David Wade from MDCH, made a comment that the State of Michigan's commitment to continue dioxin research in a larger phase beyond the pilot was unlikely to occur due to fiscal problems within the state budget. He also suggested that an industry such as Dow might fund this additional state-driven research. The important unanswered questions regarding the effect of soil level contamination by dioxin on the body burden of those residents of the flood plain can be addressed only through additional research. As stated by Linda Dykema, Ph.D., the 25 person cohort of the MDCH pilot study was not intended for generalization or to be a data source for extrapolation to a larger group. (It is unclear what assurances could or would guarantee the confidence of the environmentalist groups insofar as funded research is concerned. It is, nevertheless, important to achieve an acceptable level of confidence with them.)

The Saginaw County Department of Public Health has full confidence in the U of M.

2. The selection of and role for the Scientific Advisory Board (SAB) and the Community Advisory Board also is a common issue of concern. Often there is conflict among interest groups and this is not a new phenomenon. For example, Jack Weinberg from Greenpeace discusses in a 34-page report the perceptions of conflict-of-interest posed by the membership of the 1994 EPA Dioxin Reassessment SAB. This same criticism has been leveled at Genevieve Matanowski from the Johns Hopkins School of Hygiene and Public Health, a chairperson for one of the subsequent Scientific Review Boards. Considerations of personal integrity and historical contributions to peer-reviewed scientific articles aside, these concerns have been raised time and again and remain at the core of some of the current discussions regarding the U of M study. It is encouraging that the U of M research team is soliciting from all of the interest groups, candidates for inclusion on this SAB, and that it has offered to give “veto” power to the ATSDR. In our view, this reinforces U of M’s position of willingness to compromise on this important issue.

The Saginaw County Department of Public Health has no objection to using ATSDR as a veto authority in the SAB (or CAB) selection process. Moreover, SCDPH sees no need to assign an oversight role to MPHI or any other agency.

3. Data security, insofar as the Saginaw County Department of Public Health is concerned, is most secure in the hands of U of M, an institution whose reputation is based, in part, on a longstanding history of handling data and information in a secure and confidential manner.
4. The comparison of the data from the U of M study with the MDCH pilot is of little consequence insofar as the Saginaw County Department of Public Health is concerned. And similarly, normative data from the US population is available already. It is important to describe and explain what exposure pathways might influence the dioxin levels of the 3 cohorts under study by the U of M. The basic question of dioxin level comparisons of people living within and outside of the flood plain is crucial to the purpose of this study.

It should be understood that all studies have limitations and inherent weaknesses, that peer review provides a means for identifying those limitations and weaknesses, and that this proposed study by the U of M is an observational one which, itself, is inferior methodologically to experimental studies. However, from a pragmatic perspective, the results of the proposed study will be informative in the sense that current unanswered questions will come closer to having answers. Furthermore, these answers might form a rational basis for further studies which can shed light on the larger questions on the minds of many of the floodplain residents, namely “What is the health impact of dioxin exposure in our community?” The questions regarding whether dioxins act through a threshold mechanism, whether they are genotoxic and whether the background level of serum dioxin among the US population poses health risks are currently unanswered. Ongoing research is the means to get answers to these important questions and the proposed U of M study, unlike many other similar studies, engages the appropriate stakeholders for whom the answers are so relevant.

Finally, the Saginaw County Department of Public Health wishes to thank those responsible for

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allowing its participation in this process. We remain committed to serve the public health interests of our community and look forward to continued involvement with studies such as these. We would also like to thank the ATSDR for its interest in and willingness to respond to the community general concerns which resulted in the recent health consultation. We appreciate the renewed dialogue that has been established with the MDEQ and MDCH whose fundamental mission, goals, and objectives parallel our own. Furthermore, we appreciate the efforts of those members of the Lone Tree Council and the Ecology Center whose interest in and tireless work on environmental causes often are the necessary stimulus for action. We would like to thank Dow for its willingness to support this kind of university research.

Sincerely,

For John D. Niederhauser, M.P.H.  
Health Officer

Neill D. Varner, DO, MPH  
Medical Director

c: Tom Sinks, ATSDR  
Alan Yarborough, ATSDR  
Janet Olszewski, MDCH Director  
Michelle Hurd Riddick, Lone Tree Council  
Tracey Easthope, Ecology Center Director  
C. Michael Krecek, Midland County Health Officer  
John Phillips, Dow Chemical Company