



**Fw: General comments on St . Regis HHRA**  
**Timothy Drexler to: Arthur Stone**

US EPA RECORDS CENTER REGION 5



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Subject: General comments on St Regis HHRA

Tim

Unfortunately, neither Clayton nor I have had sufficient time to perform a detailed review of the St . Regis HHRA . We know that MDH is preparing detailed comments on the document . We did want to convey a few general comments for consideration :

- 1) The document does not integrate the various exposure pathways that are demonstrated for this population, including direct soil contact, air, groundwater, sediment, and diet (particularly fish). We know that individuals living in this area are exposed to site contaminants through these pathways . Therefore, the assessment needs to incorporate all of these pathways in order to completely characterize the risk at this site .
- 2) The document utilizes the old cancer slope factor . We would recommend that the revised slope factor in the draft Dioxin Reassessment document be used in the cancer risk calculations for the HHRA.
- 3) The evaluation of the impact of site contaminants on the contamination of fish has used an inappropriate comparison to reference lakes in the area

I realize that these are very general comments, but we believe that they are critical points that impact the integrity of the HHRA for this site, and compromise the value of this report for EPA decision-making, so that the health of this community is fully protected .

Mark and Clay

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