

Michael Regan, EPA Administrator
Janet McCabe, Deputy Administrator
Debra Shore, EPA Region 5 Administrator
Adam Ortiz, EPA Region 3 Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Ave., N.W.
Washington, DC 20460

RE: Dioxins and the East Palestine Train Derailment

Dear Administrator Regan, Deputy Administrator McCabe, Regional Administrator Shore, and Regional Administrator Ortiz:

We are writing to urge the U.S. Environmental Protection Agency (EPA) to test for dioxin in the areas surrounding and downwind of the East Palestine train derailment, especially in soil. We request that EPA launch comprehensive testing and sampling of dioxins, other chlorinated ring compounds, and other hazardous byproducts that may have been released by the burning of the [railcars containing vinyl chloride and polyvinyl chloride \(PVC\) plastic](#). We join Senators Sherrod Brown (D-OH) and J. D. Vance (R-OH) in urging EPA to require thorough testing for dioxins and other hazardous substances.

We are very concerned that, to date, the EPA has not conducted any testing for dioxins, extremely persistent bioaccumulative toxic (PBT) chemicals that break down very slowly, build up in the food chain, and can cause cancer and other serious health problems. In the [EPA's own words](#), "dioxins are highly toxic and can cause cancer, reproductive and developmental problems, damage to the immune system, and can interfere with hormones." Indeed, dioxins are one of the most toxic chemicals known to humankind and have been targeted for global phase-out under the POPs Treaty. It was the primary contaminant in the defoliant used in Agent Orange in Vietnam and a key contaminant at both Love Canal and Times Beach.

To date, EPA has not yet conducted any sampling for dioxins. This is outrageous.

Responders reportedly punctured and burned more than 115,000 gallons of vinyl chloride in uncontrolled conditions for numerous days, making it likely that dioxins and related chlorinated substances were formed and released into the communities surrounding the disaster site. Four train cars of polyvinyl chloride plastic also burned, also likely forming dioxins. There have been elevated levels of dioxins released in other major accidents involving chlorinated chemicals—from the [2004 explosion at the PVC plant](#) in Illiopolis, Illinois, to the [1997 Plastimet PVC recycling fire](#) in Ontario, to the [World Trade Center attacks](#). Oxy Vinyls' vinyl chloride monomer (VCM) plant in Texas reported the greatest releases of dioxins compared to any other facility in the country, [according to the EPA 2021 TRI dioxin factsheet](#).

Without comprehensive testing, the people in East Palestine and other communities in Ohio and Pennsylvania will not know the extent to which dioxins are also an issue.

It is critical that the EPA significantly expand the scope of testing, with input from local communities , particularly especially East Palestine, and launch a comprehensive multimedia testing program into the possible release of dioxins, other chlorinated ring compounds, and other toxic byproducts from the disaster. As a next step, the EPA should work with and seek input from the impacted communities to immediately develop and implement plans to test for dioxins and other hazardous byproducts:

- In soils at homes, parks, schools, farms, and other locations downwind of the derailment;
- In indoor dust and surfaces inside homes and other buildings downwind of the derailment;
- In farm animals, milk, and chicken eggs in farms that may be impacted by the derailment; and
- In sediments, fish, salamanders (e.g. [endangered Hellbender salamanders in OH](#)), and other aquatic life including vegetation.

Given that firefighting foams containing PFAS were used in the emergency response, this testing should include both chlorinated and fluorinated dioxins. The EPA should also work with other agencies to provide medical monitoring for impacted communities, especially East Palestine, that desire it.

This testing must be paid for by the responsible parties, not taxpayers.

While we recognize that dioxins are widely present and persistent in the environment due to industrial manufacturing and disposal processes, that *should not* prevent EPA from developing and implementing a testing plan for these highly hazardous chemicals. EPA has [robust experience evaluating contaminated sites](#) for the presence of dioxins and has experience in comparing levels of dioxins at contaminated sites to levels in areas without known direct sources.

Communities surrounding and downwind of the derailment have a right to know whether or not the fire resulted in elevated concentrations of dioxins. Expanding the testing would help demonstrate EPA's commitment to comprehensively responding to this disaster, rebuilding trust with East Palestine and other impacted communities, and advancing environmental justice.

We look forward to your prompt response. Thank you.

Sincerely,

The Vermont Natural Resources Council

CC: Brenda Mallory, Chair, White House Council on Environmental Quality
Matthew Tejada, Director, EPA Office of Environmental Justice
Barry Breen, Acting Assistant Administrator, EPA Office of Land and Emergency Management
Anne Heard, Acting Deputy Assistant Administrator, EPA Office of Land and Emergency Management
Larry Douchand, Director, Office of Superfund Remediation and Technology Innovation

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