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September 27, 2010

To the Monitoring Workgroup:

Re: Comments on the Monitoring Workgroup Report

This report is excellent and we sincerely thank the members who produced this report.

We have only a few brief comments. We note that in contrast to other workgroups you made an effort to combine action recommendations under a single heading. We note particularly the important recommendation for sample banks, which is not highlighted in the introductory heading of Recommendation #3 for expanding biomonitoring capacity. We recommend adding the sample banks into the heading.

### **Other Biomonitoring Issues**

For biomonitoring to be really useful we need to know:

What is the biomarker measuring?

How representative is the biomarker of all biodegradation/ detoxification pathways operative for this chemical in the human body? Does it represent 100%, 50% or 10% of biodegradation? How many other biodegradation pathways does science believe exist for this chemical? Do any of the degradation pathways result in the creation of more toxic metabolites? Is this test better as a snapshot in time of exposure or more representative of long term chronic exposure?

In the interest of disclosure and transparency, we need good descriptions that answer all these questions, when reporting results.

### **Environmental Monitoring**

Environmental Monitoring also raises questions about environmental transformations of the released chemical into more toxic or less toxic forms. Atmospheric chemical transformations are rained down onto the landscape and into water supplies. Persistent bioaccumulative toxins pose unique problems because they can continue to cycle in the environment for decades-- from water bodies, to air, to rain, to land and waterbodies, as has been particularly noted in the Great Lakes.

We believe it is critically important to mention the unique nature of PBTs in the environment-- that many chemicals banned 50 years ago and their metabolites are still found in the environment, while newer kinds of PBTs are entering the environment. Given persistence in the environment and biomagnification, it is critically important for us to understand total human dosing of PBTs based on current exposures, comparison to adverse effect levels and margins of safety and their possible individual and combined health effects. Some PBTs are so persistent, that they may never degrade at all.

We recommend a major effort just addressing PBTs and trends in environmental levels.

**Better understanding of Acute Exposure Incidents and health outcomes**

We need a careful scientific protocol for responding to chemical emergencies and releases so that useful monitoring data is obtained in conjunction with contact information for workers, emergency responders and the public, who were exposed. Right now we learn about health impacts after the fact and are unable to draw conclusions, because no or inadequate monitoring was performed, and there is no tracking of those most exposed.

Given the excellent job on this report we believe the monitoring workgroup is most able to add recommendations to this effect.

Thank you.

Sincerely,

A handwritten signature in black ink that reads "Barbara J. Warren". The signature is written in a cursive, flowing style.

Barbara J. Warren, R.N., M.S.  
Executive Director