

Editorial : Flawed Perspective on Dioxin Exposure

David L. Linhardt, publisher, MDN-Rejected.com June 23, 2005

As some readers know, Russell J. Harding, a former director of the MI DEQ, under Gov. John Engler, now president and CEO of the National Association of Manufacturers, is currently the senior environmental policy analyst for the Mackinac Center for Public Policy. The MCPP is a conservative and business orientated “think tank” in Midland, MI.

The relationship between the MCPP and The Dow Chemical Company has always been of interest to certain political observers.

Joseph Lehman, Executive Vice President of the MCPP and prior project manager for The Dow Chemical Company, has informed MDN-Rejected.com that no single contributor comprises more than 10% of the MCPP’s annual operating budget. In addition, Mr. Lehman indicated that contributors that tried to “buy” influence quickly learned that the MCPP is above such influence.

Mr. Lehman also indicated that, “No one outside the staff and research team is permitted to ... preview publications. This means no... company ... gets to decide... what we’re going to say... “.

Perhaps if they did, Mr. Harding’s obvious error might have been corrected prior to publication of one of his articles.

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Even though Mr. Harding was director of the DEQ from 1995 to 2003 and surely must have been briefed a number of times by his staff on dioxin contamination in the Midland area, Mr. Harding may have missed some of the finer points of the briefings.

In his insightful analysis, Mrs Harding wrote,

“... the principal source of dioxin in ... [Midland’s] nearby rivers is believed to be incineration at Dow decades ago... “

While Mr. Harding is free to believe anything that he cares to believe, more knowledgeable persons recognize that dioxin contamination of the Tittabawassee River was primarily the result of Dow’s discharges of untreated chemicals from its waste ponds and, in later years, from its poorly operated waste treatment plants. Underground leakage of dioxins from the numerous chemical waste ponds adjacent to and near the river also contributed to the very high levels of dioxins still being found, even today, in the river and its floodplain.

It’s just my opinion but I would have thought that accuracy would be a necessary job skill for a senior environmental policy analyst. Without factual accuracy, credibility crumbles.

To give Mr. Harding credit, he was correct in stating that,

“... the principal source of dioxin in Midland ... is incineration at Dow decades ago, before pollution control technology was required ...”

While the state of Michigan and the federal government may have dragged their feet in enacting legislation to limit harmful emissions from hazardous waste incinerators, the company publicly admitted that its incinerators and chemical “tar” burners were the source of significant air pollution resulting from the incomplete combustion of wastes.

It was very gracious of Mr. Harding to offer the company a possible explanation for continuing to incinerate in an unhealthy manner – “Without laws or regulations to limit harmful emissions, we kinda did what we wanted to do.”

Mr. Harding went on in the same paragraph,

“... incineration at Dow decades ago ... before the potential health and environmental effects of dioxin were contemplated.”

Mr. Harding’s comments do establish part of a time line between Dow incineration, widespread dioxin contamination and awareness of the risk to human health from dioxin exposure.

However ignorant the company may have been of the future, long term consequences of its actions, it is still responsible for those actions. “Current exposures are much lower” is not much comfort to those families that may have lost a loved one prematurely – nor it is a very effective legal defense.

Industrial dioxin exposures have been linked to increased deaths from certain types of cancers, both common and very rare. A similar correlation between dioxin exposure and increased mortality in Midland and riverside residents has not been established since no one – neither health agency nor company – has carried out the high quality epidemiology studies required to establish the link.

The company is sponsoring a \$15 million study to measure dioxin blood serum levels in exposed riverside residents. Unfortunately, financing of mortality studies has not yet been offered – nor legally required.

The rest of Mr. Harding’s article contains a number of arguable points, but editorials tend to be most effective when they are brief.

Two final points:

1. Mr. Harding’s article contained nine paragraphs – 2 mentioned human health, 5 focused on economic issues and 2 were neutral. If Mr. Harding personally believes that economic issues outweigh risk to human health, it is small wonder that little progress was made in reducing dioxin exposure during his tour of duty in the DEQ.
2. Mr. Harding does not live in a high dioxin neighborhood that is within 2 miles of Dow’s incinerator complex or in the dioxin contaminated floodplain of the river. Perspective often changes with residential location.

While researching this editorial, I did encounter some intriguing financial information about the Mackinac Center. I offer it without comment.

Financial information filed by the MCPP (an IRS Sec. 501(c)(3) non-profit organization) indicates the following for 2001:

Mackinac Center for Public Policy
2001 Financial Report

Revenue:	\$2,541,066
Income:	\$2,352,862
Added to reserves:	\$ 188,204
Total Grants:	\$ 40,000
Assets:	\$5,378,563
Increase in Net Assets:	\$2,672,643 (Increase over 2000 value)
Other Sources of Income:	Not reported (\$2,312,862)