

Rodriguez, Ricardo CDR

From: jvg0@cdc.gov on behalf of Grant, Juliana (ATSDR/DRO) [jvg0@cdc.gov]
Sent: Monday, June 01, 2009 3:31 PM
To: Rodriguez, Ricardo CDR
Subject: Comments for dispersant working group

Hi Ric,

My comments for the dispersants working group are below. Let me know if you have any questions.

Thanks.
Juliana

Overall net-benefit of dispersant use should also consider human health and not just environmental impacts. It is likely that the human health benefits will have less of an impact on decision making than environmental net benefits. However, discussion of this issue should still occur in the guidelines, particularly as it pertains to subsistence food impacts. ATSDR and the Alaska Department of Health and Social Services are able to provide input on these issues. Worker health and safety is another critical issue that should be addressed beyond just appropriate use of PPE. Specifically, short- and intermediate- term exposures to dispersants should be discussed in the guidelines. Addressing these issues early in the process will make the implementation of dispersant use easier in the future.

Tribal representation and involvement in the overall process, not simply in commenting on final documents, is critical. I realize that this is a difficult thing to do in Alaska, with the large number of tribes we have here. However, truly engaging with tribes on a government-to-government basis is a legal requirement.

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