

Public Comments Received on the J.H. Baxter Health Consultation

On March 2nd, 2023, Oregon Health Authority (OHA) released a Health Consultation for the J.H. Baxter facility and sought public comment on that draft. More background information about OHA's work related to the J.H. Baxter site in Eugene, Oregon is available on [our website here](#). The final draft of the Health Consultation will attempt to incorporate comments where possible and will include a new appendix that summarizes comments by theme. In that appendix, OHA will respond to each theme, explaining where in the final document that theme of comments was incorporated or explaining why that theme of comment could not be incorporated into the final Health Consultation. This document contains the public comments OHA received in the form that OHA received them. OHA has not modified these comments in any way, except to redact personally-identifiable information. However, names are subject to public records request. Entries have been numbered for easier reference and are listed/numbered in no particular order. The program within OHA that did this work is called the Environmental Health Assessment Program (EHAP). Commenters may reference OHA or EHAP in their comments.

Comment #1

I think there is an important issue that is being dangerously ignored regarding j h baxter. It's bad enough they have been polluting. But the issue isn't what we know.....it's what we don't know. For how long was this happening that we r not aware of? And that MATTERS! When they were evaporating those chemicles into the air. It was leaving a small film on every service everywhere (on rooftops). Then when the rain would come. All that would go into the runoff drains. And if ur home is like mine and had the old concrete drain lines that over time became compromised in some spots. That runoff was seeping into the ground in those spots. And anyone who is not stupid can prob guess what that might do over say a 40 year or longer timespan. Those chemicles have decomposing properties when natural elements r exposed to them over long periods. And because the water collects the toxins in the gutters. I'd say it's something of concentrated st that point and leaking into the same spots in the groundcan u say sinkhole! We all better wise and start looking for the real danger lerking beneath our feet.

██████████

Comment #2

My comment is that it took WAY too long to shut down this highly polluting environmental nightmare. The area surrounding the plant site is known to be polluted, micro amounts of these toxic carcinogens are known and proven to cause cancer and other illnesses including ongoing respiratory illness-that much is known- therefore every residence within 3000 ft of the plant site should be purchased, razed and residents relocated to prevent people, especially children from further exposure to residual toxins.

██████████

Eugene

Comment #3

https://www.kezi.com/news/oha-releases-draft-report-on-health-impact-of-j-h-baxter-plant-contamination-asks-for/article_b3176e20-b94e-11ed-8619-a3abbab90e21.html

I was a resident of the [REDACTED] in downtown Eugene for almost 5 years beginning in April of 2018.

I read with interest over those years stories in local news media about the Baxter plant, and exchanged several emails with attorney [REDACTED] on the topic. I do not recall any ill effects for the last year (2022) that I lived in the [REDACTED], but for the first several years I lived there I experienced ill effects that I thought may have been attributable to the plant. The [REDACTED] is almost 3 miles east of the Baxter address, but I lived on the 7th floor of [REDACTED] and rarely closed windows. I often experienced a burning sensation in my eyes, an irritated sore throat unrelated to any cold or flu or covid or other illness, and a sense that I was inhaling foul fumes (like traffic exhaust but sharper) in my throat. I noted this fairly often, always after dark, but it never occurred during my last year there (2022). No idea whatever whether this could be related to J.H.Baxter but you asked for comment.

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[REDACTED]

[REDACTED]

Comment #4

The concern for dioxins is important. Is there a baseline? You must consider the other sources of dioxins.... Forest Fires....House Fires....Industrial Fires.

Thank You

[REDACTED]

Comment #5

How did the dioxins get over to the residential area??? If dirt/soil was dumped there than someone needs to answer for that. The distance from the plant to the residential passes over highway and than a barrier? I also wonder about the lands then that were sold before the closure?? No one lives in a glass house when it comes to the past and history but still there are questions to be answered. Many of those questions should rise to the city as well for allowing encroachment with residential housing into an industrial area with a treating plant that has been there for years, this I also think needs some scrutiny.

Regards

[REDACTED]

Comment #6

Please accept my comment about soil contamination by the J.H. Baxter wood treatment facility in Eugene. This company has been poisoning the soil and air for decades, injuring community health and lowering property values. The State of Oregon should hold J. H. Baxter fully accountable for the damage it has inflicted.

Comment #7

Dear Authors of the OHA Health Consultation,

The following is my public comment and testimony in response to the J.H. Baxter OHA Health Consultation:

My husband grew up on the corner of [REDACTED] next to J.H. Baxter. He lived there for the first 20+ years of his life. In early August of 2022, days before his 34th birthday, he suddenly fell severely ill with a plethora of neurological symptoms that left doctors stumped. He spent 7 weeks in the hospital and after many tests, scans, and biopsies he was eventually diagnosed with an extremely rare pediatric central nervous system cancer called diffuse leptomeningeal glioneuronal tumor, or DLGNT. Before his diagnosis, he lived a very healthy and active lifestyle and had no underlying health conditions. Now, he's physically disabled, has severe short term memory loss and, at times, experiences dementia-like symptoms.

Cancer doesn't run in his family. Given the close proximity in which he lived to J.H. Baxter and his long-term childhood exposure to the carcinogenic toxins spewed by the industrial plant, my husband's illness is no coincidence.

Dioxin is a well known carcinogen. For the EHAP to come to the conclusion that there is a low cancer risk from chronic exposure to soil, surface water, groundwater, backyard fruits and vegetables, and backyard chickens seems flawed. This also fails to take into account dioxins that are absorbed through respiratory inhalation which is an important route to take into consideration. Growing up and living in Eugene most of my life, I can attest to the strong and unique smelling odorous fumes that J.H. Baxter produced that caused respiratory irritation to myself and others.

Cancer data tracking for the J.H. Baxter Health Consultation does not seem complete and accurate. Although, I understand that it is very difficult and near impossible to track the causes of some cancers, it seems like the OHA failed to paint a complete picture of the adverse health effects J.H. Baxter has/had on its neighbors as well as its employees. For example, the EHAP failed to follow up with Oregon OSHA regarding J.H. Baxter's past employees and the harmful health effects, including cancer, they may have suffered as a result of working there. The Health Consultation also fails to look at causes of death of people who have worked at and/or lived around J.H. Baxter to see if there could be a link to exposure. It's also important to take into account those who lived near J.H. Baxter for a long time and have since moved away and have since fallen ill due to exposure to chemicals from J.H. Baxter. If my husband and I didn't still live in Eugene at the time of his illness, we may have never made the connection between his cancer and J.H. Baxter. There is an entire community of people from the past and present who have had exposure to dioxins and other harmful chemicals produced by J.H. Baxter that needs to

be investigated before coming to the conclusion that there is a low cancer risk from chronic exposure to contaminants. It is also important to update and review cancer data near the J.H. Baxter site as the current data OHA has is from 2018.

I also take issue with the area of investigation and the fact that the report says those living outside of that area are deemed safe. My husband grew up directly across the street from the area that has been tested. I ask that the OHA continue soil testing outside of the area of investigation until they no longer find dioxin in people's yards.

As you know, J.H. Baxter was in operation for 79 years from 1943-2022. That is a lifetime of toxic and harmful chemicals produced by them. Seventy-nine years worth of environmental damage and human exposure to carcinogens. It is important to take into account the history of the company as well as the health history of the people who have lived there/are still living there long-term and those who have worked there over the past 79 years. I appreciate the work the OHA is doing in bringing awareness to the harmful health and environmental effects of J.H. Baxter so that we can do better for our community in the future.

With respect,

██████████

Eugene, OR

#### Comment #8

Hi there -

I am one of the owners of ██████████ Eugene, OR 97402.

Is there any way to know if soil samples were taken from our yard and if so what the results were? The report says we are in the area where testing was done.

Thank you,

██████████

#### Comment #9

Could this company's pollution be causing my issues? I have often wondered. Thank you. ██████████

██████████

#### Comment #10

We received information from our neighborhood community organization concerning this serious health risk to our neighborhood and the residual affects that continue. For this reason, we wanted to submit our own health concerns with respect to this company and the negative impact they have had on us.

We purchased our home at [REDACTED] in July of 2009 (almost directly due north of JH Baxter's facility on Roosevelt), and never knew what the overbearing toxic smell was that was particularly strong during the summer months when we would have our windows open. This odor caused us severe headaches daily, but we had no idea what it was, nor did we take the time to investigate the cause. It was only AFTER the wood treatment plant was shut down that we discovered that the cause of the odor and smell was due to JH Baxter.

So, in addition to the soil contamination and the health hazards affecting those neighbors, it is clear that there was also air contamination affecting those of us in the outlying areas, particularly north of the wood treatment plant.

Thank you for your consideration.

[REDACTED]  
Eugene, Oregon

Comment #11

Hello

I live in the Trainsong neighborhood and have been reading about the JH Baxter contamination situation. I can't find any maps showing the affected areas and I would like to know if my house is in the contaminated area and, if not, how far it is from that area. Are there any maps available where I could find this information?

Thank you,  
[REDACTED]

Comment #12

Hello

Is drinking water being tested?

I live very close to the known contamination area, and i have a strong suspicion our soil is contaminated too.

How do we get testing?

Comment #13

Thank you for the opportunity to submit public comments addressing the OHA Health Consultation for J.H. Baxter Neighborhood.

We would appreciate receiving a confirmation that the attached document was received and entered into the public record.

Delivered electronically to ehap.info@oha.oregon.gov on 5/31/2023

**Beyond Toxics Testimony Submitted in Response to the OHA Health Consultation for J.H. Baxter Neighborhood**

To the Authors of the OHA Health Consultation,

Thank you for the hard work that went into researching and producing the draft Oregon Health Authority (OHA) Health Consultation for the neighborhoods to the north of the J. H. Baxter wood preservation facility. On behalf of Beyond Toxics, please accept these comments on the consultation.

Beyond Toxics is a state-wide environmental justice nonprofit with thousands of our supporters across the state. For more than 18 years, Beyond Toxics staff and board members have organized in West Eugene. We work closely with the community to help them become more active and informed participants in decision making about their lives, wellbeing, and environmental quality — including health impacts and property values. Through the years, we've provided community-based research, events, workshops, technical assistance, trainings, and emotional support in the Bethel and Trainsong neighborhoods. We also serve as members of the J.H. Baxter Core Team and are deeply knowledgeable about the pollution and lasting harm from our experiences on the Core Team and in the community. Beyond Toxics also served on the Cleaner Air Oregon Rules Advisory Committee at the request of Governor Kate Brown.

We are writing to share our analysis of OHA Health Consultation. Our comments are motivated by our pledge to guarantee environmental protection and health for the Bethel and Trainsong communities as well as individual residents, regardless of their income, status, or background. Our intention is to provide constructive comments and recommendations for additional study, analysis or action in the spirit of collaborative partnership.

Our comments are organized based on the six conclusions in the Health Assessment with individual responses to each. We also wrote concluding recommendations. 2

**OHA Conclusion 1: Regarding the risk that dioxin exposure for a year or longer can have for children under the age of six.**

Beyond Toxics Comments: We agree that young children who come into contact with soils having a dioxin concentration above 40 ppt for more than a year are at a high risk of non-cancer health impacts. However, the conclusion is narrowly based on the assumption that children are most likely to contact dioxin through ingestion, and secondarily dermal absorption. We would like to see the Health Consultation include an analysis of an inhalation exposure pathway. Dioxin inhalation could impact children too young to play outdoors and fetuses carried by pregnant women.

Dioxins are absorbed into the human body through respiratory inhalation as well the digestive tract or through skin contact.<sup>1</sup> It is likely that dioxins were created by a number of processes at J.H. Baxter. One of the sources may have been the unpermitted burning off of 1.7 million gallons of hazardous waste in its retort ovens over a five-year period. Attempting to dispose of contaminated hazardous wastewater through low temperature, incomplete combustion is likely to have contributed to the formation of toxic emissions such as polychlorinated biphenyls (PCB), polychlorinated dibenzo-p-dioxins (PCDD). Based on the community's reports when J.H. Baxter was in operation, residents frequently complained of strong, sometimes overpowering odorous fumes of chemicals. It was not unusual to hear a resident describe the experience as "a wall of toxic fumes moving towards us." Toxic substances such as dioxin and small particles released from incomplete combustion sources are ultimately dispersed as air pollutants prior to deposition on soils, ultimately leading to their bio-persistence in the environment.

A large number of residents living north of J.H. Baxter do not have air conditioners and rely on open windows to circulate cooler air through a house. Outdoor air making its way indoors carries pollution particles. Pollution trapped inside a home can have an enormous impact on health. Dust and soot particles can lodge in carpets and furniture creating a pathway for both inhalation and dermal contact. OHA should not overlook the possibility that the infiltration of air pollutants into the indoor home space can compromise the quality of air breathed by an entire family.

For these reasons, we disagree with the elimination of the inhalation pathway as a potential route of dioxin exposure as described on page 26. **Inhalation should be included as a potential exposure pathway to err on the side of caution and to acknowledge the community's experiences.**

Recommendations: Beyond Toxics agrees with the recommendations outlined on pages 7 and 8 to reduce exposure to dioxin. We also suggest adding a recommendation to address gaps around ceiling, doors or windows where air may enter the indoors and deposit dust on rugs, floors, furniture, etc. OHA could include a discussion to encourage residents, when possible, to install air filtration devices or electric heat pump systems to filter our air intrusions and support cleaner indoor air.

**OHA Conclusion 2: Residents that are outside the areas of investigation are unlikely to have been contaminated by dioxin emissions from JHB.**

Beyond Toxics Comments: We understand that dioxin testing through neighborhoods in the Bethel and Trainsong area is prohibitively expensive. Even if more testing for dioxin in soils were to be done, the results may or may not be consistent. However, we urge OHA not to rely on the limited data set used to reach this conclusion. For example, a study of air dispersion of PAHs centered on the J.H. Baxter site conducted by the PNW Center for Translational Environmental Health Research and Beyond Toxics clearly demonstrated that significantly higher levels of chemicals were measured to the northeast and the south of the facility. This data was presented

to the Core Team, but was not referenced in the Health Consultation.<sup>ii</sup> Inclusion of this research could have led to a different conclusion than what was reached in the Health Consultation.

In addition, researchers studying the dispersion of dioxin compounds released from combustion sources concluded dioxins are “ultimately dispersed among, and can at times accumulate in, various environmental compartments (e.g., soils, vegetation, indoor dusts, animals, and humans). Some contaminants that are released from facilities are likely to contribute primarily to environmental contamination on a local scale [approximately 6 miles]. However, others that are more persistent in the environment, can be distributed over much greater distances.<sup>iii</sup>

Recommendations: Beyond Toxics suggests that the data used in this Health Consultation to determine the geographic scope of the dioxin contamination is insufficient to arrive at Conclusion 2. We support the ongoing soil sampling and data collection in the Bethel neighborhood to build out the database and to form a more complete understanding of the extent of the pollution from the activities carried out by J.H. Baxter over the decades they were in operation.

**OHA Conclusion 3: Dioxin is unlikely to have contaminated edible portions of fruits and vegetables in backyard gardens.**

Beyond Toxics Comments: We agree with this assessment. However, we think it would be more factually correct to clearly state that the main pathways of dioxin exposure when eating fruits and vegetables could be from ingesting deposits of airborne particles (dust) on plant surfaces as well as ingesting edible plants that came into contact with contaminated soil.

Recommendations: Beyond Toxics suggests adding an additional recommendation that cautions residents not to graze on fruits and vegetables while out in the garden without first washing them. Many people, especially children, love to graze while gardening before they bring produce into the kitchen for washing and preparation. However, airborne dust particles that settle on leaves and skins of soft fruits and vegetables may also contain dioxin, with or without direct soil contact.

**OHA Conclusion 4: Eating eggs from backyard chickens from residences near JHB that have dioxin levels above 4.7 ppt could be harmful to health.**

Beyond Toxics Comments: We agree with Conclusion 4 and appreciate OHA taking this precautionary approach. The possibility of a soil-chicken-egg exposure pathway is considered to be the most sensitive exposure pathway of dioxins in soils to humans.<sup>iv</sup> However, our hope is that OHA will more thoroughly research the risk from local free range eggs. In a recent study, assessments of “levels of PCDD/Fs and PCBs in chicken eggs and soil have shown that surprisingly low concentrations of PCBs and PCDD/Fs in soil can result in exceedances of regulatory limits in chicken eggs” because chickens ingest higher amounts of soil than other farm animals per body weight.<sup>v</sup>

Eggs are a common food item for people, particularly children, who would be most at risk for exposure to dioxin due to their lower body weight and developing organs.



Recommendations: Free range eggs from various parts of the area surrounding the plant should be tested for dioxin levels. OHA should carry out a systematic assessment of chicken eggs areas around J.H. Baxter due its release of TCDD/Fs and PCBs.

**OHA Conclusion 5: Surface water and ground water near the Baxter facility will not harm people's health.**

Beyond Toxics Comments: We request that surface water sampling methodology and sampling data are shared be provided so the public can better understand the methodology and raw data informing this statement. There is a possibility that dioxins in atmospheric deposition to the earth's surface, combined with dust and dirt from surface run-off, may have a significant influence on the surface water quality.<sup>vi</sup>

**OHA Conclusion 6: Dioxin levels at Trainsong.**

Beyond Toxics Comments: We support Conclusion 6 and urge the Oregon Department of Environmental Quality (DEQ) and OHA to continue collecting and analyzing additional soil samples to evaluate the health risks and learn the extent and source of the dioxin contamination in the nearby Trainsong neighborhood.

Recommendation: We urge DEQ and OHA to test in other areas of Trainsong neighborhood including along the train tracks adjacent to Trainsong park and closer to the railyard. It is possible that dioxin persists in the soil from herbicide sprays along the rail tracks. Is it possible to determine the chemical signature (congener) of the dioxin compounds found in the Trainsong neighborhood to see if they match up with dioxin compounds from wood preservation activities or other dioxin forming activity?

We'd like to suggest that OHA does not rule out J.H. Baxter as a source of the dioxin in Trainsong. The facility site is less than 1 mile from Trainsong Park (as the crow flies). The 2018 article in Journal of Environmental Sciences found that dioxin is very persistent in the environment, and can be distributed up to a regional scale over hundreds of kilometers. PCDD/Fs can have 'long' atmospheric residence times, rendering them subject to long-range atmospheric transport.<sup>vii</sup> Over the years, Beyond Toxics has heard many complaints of creosote or a similar chemical odor in the Trainsong neighborhood, and our staff has experienced the same nauseating odors on multiple occasions. Based on community experiences, local wind patterns may have contributed to air pollution from J.H. Baxter moving toward and falling out over Trainsong.

**Additional Recommendations and Remarks:**

1. Conduct a new and **updated review of OSCAR cancer data** for the census tracts north, northeast, and northwest of the J.H. Baxter site. The previous OHA review of cancer data was limited to cases up through 2018, five years ago.
2. **Fund risk-reduction actions**, particularly for vulnerable populations with high rates of exposure. For example, reduce poor indoor air quality for vulnerable populations (daycares, schools, and retirement homes) by reducing outdoor contaminants intruding into indoor spaces. Actions could include working with nonprofits and the Bethel

neighborhood to fund home retrofits to fix leaks and air gaps to limit how much outdoor air gets in. Beyond Toxics is already working with OHA to distribute 100 portable air conditioners to qualifying households throughout Lane County, but that is insufficient to address the problem in Bethel and Trainsong.

3. **Reconsider sampling dioxin in indoor dust in residences with over 40 ppt dioxin in soils.** In 2011 the EPA funded a study on dioxin detections in house dust in homes located near a former wood treating site where chlorinated dioxin/furans in soils were to be remediated under Superfund. Results showed that the chlorinated dioxin/furan data in dust samples showed an average background concentration of 25 ppt, with dust from homes near the Superfund site approximately 14 ppt higher. Congener patterns in dust from homes near the wood treating site were consistent with contributions from soil.<sup>viii</sup>
4. **We urge OHA to collaborate with Oregon OSHA to reach out to former J.H. B workers on worker health issues and the harms from exposure at work.** IN the spirit of the Core Team, let's break down agency silos to create better health outcomes for all. OHA needs to be doing more to incorporate worker health/exposure into Health Consultations like this one. Dioxin exposure is a critical health issue for both the workers and the neighbors.
5. Order **biological testing for blood levels of dioxin** in nearby residents whose homes have the highest dioxin levels in their yard soils. TCDD and other similar compounds are rapidly absorbed into the body and slowly eliminated, making body burden (bioaccumulation) a reliable indicator of exposure and absorbed dose. The EPA published a study of routes of absorption of dioxins, percent absorbed, disposition in body tissue: [https://cfpub.epa.gov/ncea/iris\\_drafts/dioxin/nas-review/pdfs/part2/dioxin\\_pt2\\_ch01\\_dec2003.pdf](https://cfpub.epa.gov/ncea/iris_drafts/dioxin/nas-review/pdfs/part2/dioxin_pt2_ch01_dec2003.pdf)
6. Beyond Toxics wants to go on the record to disagree with the conclusions in the 2007 EHAP Health Consultation discussed on 15-16. We believe there was insufficient evidence to conclude that levels of naphthalene in the neighborhoods closest to J.H. Baxter were "unlikely to experience short-term or long-term health effects." Also, based on Beyond Toxics' extensive door-to-door canvassing in the neighborhood and the results of our Community Health Survey, we did not find that smoking was "a strong link" to those affected by cancer. The earlier EHAP Health Consultations lacked sufficient knowledge of what unpermitted pollution-causing activities were occurring at J.H. Baxter and community concerns and narratives were largely discounted.

### **Conclusion:**

We hope OHA will continue to develop effective public communication of the health risks from the J.H. Baxter facility and its long history of illegal handling of air contaminants and hazardous waste. Communication of neighborhood-scale risks due to long-term exposure is needed to more accurately convey the major portion of the health risk attributable to dioxin exposures. We would

like to discuss with OHA what ideas the agency has to understand and determine the risks for people with long term past exposures from growing up in the vicinity of J.H. Baxter or living on contaminated properties for decades.

Respectfully Submitted by,

Lisa Arkin, Executive Director

Arjorie Arberry Baribeault, Environmental Justice Community Organizer

Beyond Toxics

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<sup>i</sup> State of Illinois Department of Public Health, Dioxin Environmental Fact Sheet, February 2009.

Accessed at

<http://www.idph.state.il.us/envhealth/factsheets/dioxin.htm#:~:text=Dioxins%20also%20can%20enter%20your,breathe%20or%20by%20skin%20contact>. Also State of New Jersey Department of Health and Senior Services Dioxin Hazardous Substance Fact Sheet, September 2002. Accessed at

<https://nj.gov/health/eoh/rtkweb/documents/fs/1806.pdf>

<sup>ii</sup> See “West Eugene Air Quality Study,” available at [https://www.beyondtoxics.org/wp-content/uploads/2022/09/AirSamplingStudy\\_Report\\_Summer2022\\_BEYOND\\_TOXICS\\_OSU.pdf](https://www.beyondtoxics.org/wp-content/uploads/2022/09/AirSamplingStudy_Report_Summer2022_BEYOND_TOXICS_OSU.pdf)

<sup>iii</sup> National Research Council (US) Committee on Health Effects of Waste Incineration, Board on Environmental Studies and Toxicology. Waste Incineration and Public Health, Chapter 4: Environmental Transport and Exposure Pathways of Substances Emitted from Incineration Facilities. p. 73. National Academies Press (US); 2000.

<sup>iv</sup> Anastasia D. Kudryavtseva, Andrey A. Shelepchikov, Efim S. Brodsky, Free-range chicken eggs as a bioindicator of dioxin contamination in Vietnam, including long-term Agent Orange impact. *Emerging Contaminants*, Volume 6, 2020, Pages 114-123.

<https://www.sciencedirect.com/science/article/pii/S240566502030007X>

<sup>v</sup> Petrlik, J., et al., Monitoring dioxins and PCBs in eggs as sensitive indicators for environmental pollution and global contaminated sites and recommendations for reducing and controlling releases and exposure. *Emerging Contaminants*, Volume 8, 2022. Pages 254-279, 5

<https://www.sciencedirect.com/science/article/pii/S2405665022000166>

<sup>vi</sup> Minomo K., et al., Influence of combustion-originated dioxins in atmospheric deposition on water quality of an urban river in Japan. *Journal of Environmental Sciences*, Volume 64, 2018. Pages 245-251,

<https://www.sciencedirect.com/science/article/pii/S1001074217307325>

<sup>vii</sup> Lohmann R, Jones KC. Dioxins and furans in air and deposition: a review of levels, behaviour and processes. *Sci Total Environ*. 1998 Aug 12;219(1):53-81. doi: 10.1016/s0048-9697(98)00237-x. PMID: 9770324.

<sup>viii</sup> Cline, Patricia, Understanding Dioxin-Like Compounds in Indoor Dust: A Final Technical Report prepared for the EPA by the Protect Gainesville’s Citizens, Inc., Nov. 2014. Accessed at <https://clu-in.org/download/contaminantfocus/dioxins/Dioxin-Indoor-Dust-Study-2014.pdf>.