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Record Type: Record

To: John Morrall@EOP

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Subject: Suggestion for Regulatory Reform

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Name of Guidance:

National Primary Drinking Water Regulations for Radionuclides

Regulating Agency:

Environmental Protection Agency

Subagency (if any):

Office of Water

Citation (Code of Federal Regulation):

65 FR 76708

Authority (Statute/Regulation):

40 CFR Parts 141 and 142

Description of Problem (Nature of Impact and on Whom):

There are several problems associated with the subject rule revision.

1. EPA promulgated this rule revision through a NODA, instead of reissuing a revised rule, thus circumventing the normal rule revision process.

2. The technical bases for EPA's rule is not supported by anything but mathematical models of cancer incidence, which themselves have not been substantiated at the miniscule, sub-environmental levels at which EPA seeks to postulate health effects. No published epidemiological studies support the EPA's rulemaking.

3. The only cost-benefit studies the EPA has published on this rule demonstrate a negative cost-benefit i.e., the rule does more harm than good. And yet, the rule was still instituted.

4. The net effect of this rule is to force primacy states into adopting these unnecessarily low and unsubstantiated drinking water standards, forcing some Community Water Systems to either abandon quality water supplies or install expensive filtering systems that actually DO create a radioactive waste hazard.

The Texas Radiation Advisory Board has taken an official position on this rule in a letter to the Texas Natural Resource Conservation Commission see <http://www.tdh.state.tx.us/ech/rad/pages/TRABpdf.htm>

#### Proposed Solution:

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#### Estimate of Economic Impacts (Quantified Benefits and Costs if possible / Qualified description as needed):

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