

September 7, 2000

Dear Mr. Tozzi,

Re: National Primary Drinking Water Regulations; Radionuclides, Proposed Rule; 65 Fed. Reg. 21,575 (April 21, 2000); Water Docket W-00-12.

We have submitted the enclosed substantive comments on the subject rule that refute the scientific basis for the arbitrary presumption that low-dose radiation is harmful. As demonstrated in the study of the scientific foundations for Chemical Hormesis by Ed Calabrese, low doses of radiation are beneficial, in fact are, like toxic materials that are essential nutrients that we get in our vitamin pills, essential to biological functions. Organisms deprived of background levels of radiation weaken and die.

But, even if that were not fully demonstrable (as related research has been actively suppressed by government agencies and their well-funded science interests, regulatory limits that are below 10% of the lowest levels of natural sources, which then extends to levels that are more than a factor of 100 greater, with no indicated adverse effects, is arbitrary and capricious. Further, 10s of millions of people receive substantial medical radiation without adverse effects.

EPA has entered a court agreement to issue the subject CWA rule by Nov 21. In addition to our scientific objections, it is fair to say that the preparation of this rule is a jumble of out of date data, mostly from the original 1976 basis and a 1991 draft. For example they use out-of-date NAS reports, etc. Others have commented on such matters, which might get in the way of challenging them directly.

Nevertheless, we would like to know whether this topic is in your range of interests, and if possible, can you review the comments attached and provide your opinion on the potential basis to file suit, presuming that they promulgate rules based on the LNT. (They published in the Fed Register when their SAB/RAC recommended they use the 'radium dial painters' health effects data (no cancer effects below 1000 rad to the bone, which is ~125,000 times the lifetime dose for their 5 pCi/L radium in drinking water limit.)

We can send you the attachments to the comments, including our "Data Document" on radiation health effects in the scientific literature that refute the LNT.

You can see part of it at:

<http://cnts.wpi.edu/rsh/Data-Docs/>

Other information on the science can be found at:

<http://cnts.wpi.edu/rsh/Docs/>

Thankyou

Regards, Jim Muckerheide  
Radiation, Science, and Health  
<http://cnts.wpi.edu/rsh/>