

**Physicians for Social Responsibility ♦ Natural Resources Defense Council
Friends of the Earth ♦ Food and Water Watch
Clean Water Action ♦ Public Citizen ♦ Beyond Nuclear
Public Employees for Environmental Responsibility
Nuclear Information and Resource Service
Environment America ♦ Riverkeeper
Committee to Bridge the Gap**

Howard Shelanski, Administrator
Office of Information and Regulatory Affairs
Office of Management and Budget
725 17th Street, NW
Washington, DC 20503

December 22, 2015

Re: Proposed Amendments to EPA Protective Action Guidance (RIN 2060-ZA19)

Dear Administrator Shelanski:

On December 5 of this year, OMB received for review from the US EPA proposed changes to its Protective Action Guides (PAGs) for responding to radiological releases. Press reports indicate that the proposals would markedly increase the levels of allowable radioactive contaminants in drinking water. We write to inform you that such an effort would be met with a firestorm of controversy, and urge that the proposals be rejected. We also request a meeting/conference call with your senior staff tasked with the review.

Currently, protective actions are to be taken when radionuclide concentrations in drinking water exceed the Maximum Contaminant Limits of the Safe Drinking Water Act. Legal constraints (anti-backsliding requirements) prohibit EPA from relaxing those limits. However, there has been a long-standing push to undermine the Safe Drinking Water Act and allow vastly higher concentrations of radioactivity in water people consume.

This action, however, was too controversial for EPA to take when it published its PAGs a couple of years ago. So EPA published the PAGs without changing the water limits, but indicated it was interested at some time in the future in considering breaching the Safe Drinking Water Act limits for PAG purposes. We presume that that is what EPA has now transmitted to OMB for approval. This could result in the public being forced to consume water with concentrations of radionuclides hundreds or even thousands of times higher than considered acceptable under the Safe Drinking Water Act.

We want to alert you that such a proposal would be extraordinarily controversial. Scores of groups opposed such possible action in the past, and we believe this would be a high visibility matter of substantial concern to legislators, the news media, and the public. People would be extremely upset when they learn that the Obama Administration is contemplating imposing

consumption of water with vastly higher concentrations of radioactivity than considered acceptable under the Safe Drinking Water Act.

Furthermore, the claim that there is no significant economic impact is incorrect. Were the Administration to force this proposal through, and a radiological release contaminated water far above longstanding acceptable levels, protective actions might not be taken. People would have to consume highly radioactive water. The affected area would likely shut down. Schools would close; businesses would be shuttered; people would move out rather than drink water with radioactivity concentrations far above what has been historically considered acceptable.

We ask you to not approve the extraordinarily controversial proposal, and we request a meeting or conference call to discuss the troubling nature of what is quietly being put forward.

Sincerely,

Daniel Hirsch, President
Committee to Bridge the Gap

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