

REPORTED REQUEST FOR RFC #: 11702

Request for Correction: PERCHLORATE ADVISORY LEVELS.

(1) THE FEDERAL AND THE REGION 1 EPA HAVE DIFFERENT ADVISORY LEVELS FOR PERCHLORATE (4 TO 18 VS 1 PPB).

(2) REGION 1 EPA HAS DIFFERENT ADVISORY LEVELS FOR PERCHLORATE FOR DIFFERENT SITUATIONS (MILITARY VS CIVILIAN FIREWORKS). THIS APPROACH LACKS INTEGRITY AND ACCURACY.

Compliance with IQGs: MULTIPLE PERCHLORATE ADVISORIES CONFLICTS WITH THE ACCURACY AND INTEGRITY GUIDELINES OF THE DATA QUALITY ACT.

ON JUNE 20, 2003 WE ASKED THE ASSISTANT ADMINISTRATOR OF THE FEDERAL EPA TO EXPLAIN THIS APPARENT CONFLICT. AS WE HAVE NOT HEARD BACK ON THIS REQUEST, WE ARE NOW FILING THIS "REQUEST FOR CORRECTION".

Recommendation: THE EPA SHOULD ADOPT A UNIFORM ADVISORY LEVEL FOR PERCHLORATE, EVEN IF AN INTERIM ONE.

Impact: THE REGION 1 ONE PPB ADVISORY LEVEL HAS BEEN TAKEN AS AN MCL AND HAS:

(1) LED TO INCREASED WATER RATES DUE TO LOSS OF 40% OF WATER SUPPLY FOR THE BOURNE WATER DISTRICT (BWD) CAUSING PURCHASE OF OUTSIDE WATER.

(2) LED TO POSSIBILITY OF CHLORINATION OF BWD DRINKING WATER AFTER TREATMENT.

(3) THREATENED JOBS ON CAMP EDWARDS AND THE MMR DUE TO REDUCED TRAINING NOW ON THE MMR.

(4) REDUCED TRAINING COMPETENCE FOR SOLDIERS ON CAMP EDWARDS, SOME OF WHOM ARE DEPLOYING TO IRAQ.

(5) THREATENED FUTURE FIREWORKS DISPLAYS ON LAND NEAR THE MMR BOUNDARY.

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