

George Seaver <g.seaver@verizon.net>
03/14/2003 09:41 AM

To: quality.guidelines@epamail.epa.gov
cc:

Subject: Request for Correction on Region 1 EPA's Carcinogen Statement Regarding Perchlorate

Dear Sirs;

For a year now the New England Region 1 EPA has been stating to the public and the media that perchlorate is a carcinogen, a probable carcinogen or a possible carcinogen. The great bulk of the evidence, including the EPA's own peer review of perchlorate, indicates that it is not a carcinogen. For example, the chemical is not included on any of the lists of carcinogens, such as that of 10th Report on carcinogens by the Department of Health and Human Services.

Furthermore, Mr. James Woolford, Director of the Federal Facilities Restoration and Reuse Office, stated in an email response to us on February 28, 2003, that the EPA has made no determination or statement on this matter.

As you know, the claim that anything is a carcinogen has a wide effect on people and policy; in this case it has caused the closure of 60% of the water supply for the Bourne Water District (BWD), as well as increased costs to the ratepayers. We now ask you to promulgate the policy statement of Mr. Woolford to the public, the media and, most importantly, to the New England EPA.

In compliance with Section 8, "Administrative Mechanisms for Affected Persons to Seek and Obtain Correction of Information" of your "Guidelines" under the Data Quality Act, we submit the following information.

1. Name and Contact Information.

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2. Information not in compliance with EPA guidelines.

At a meeting held by the Bourne Water District (BWD) in March 2002 to discuss the perchlorate near their wells, representative of the New England EPA stated that perchlorate was a carcinogen. We challenged them on this assertion, citing the list of carcinogens published by the Health & Human Services web site. Also, at an October 2002 meeting of the MMR Senior Management Board, Mr. Todd Borci of the New England EPA again stated that perchlorate was a carcinogen. We again challenged him on this, citing references additional to the HHS one to support my point.

All during this time and up to the present, the newspapers, particularly the Cape Cod Times, have published this carcinogen claim. When I challenged Mr. Kevin Dennehy of the Cape Cod Times on this, he changed the published statement to read "according to the EPA.". In November 2002, a seminar was held in Cataumet by Professor Thomas Zoeller of the University of Massachusetts and of the EPA Peer Review team. At this meeting Professor Zoeller stated categorically that perchlorate was not a carcinogen. Finally, in a February 28, 2003 email response to us regarding the above facts, Mr. Woolford stated that the EPA has made no determination or statement as to the carcinogen status of perchlorate.

3. Request for corrective action.

All of this has been relayed to Mr. Woolford in a series of recent emails. In several responses, starting on February 28th, he stated that the EPA has not made a decision on the cancer causing status of perchlorate. When we again told him of the public statements of the New England EPA, he then replied on March 11, 2003 that their R & D Department is discussing it and will come out with a statement in the future.

4. The Affects of these erroneous statements.

The promoting of a carcinogen status for a chemical that may be in the drinking water has a dramatic effect on consumers. It causes drastic and emotional actions to be taken. In 2001 the customers of the BWD had turned down joining the MMR Water Cooperative decisively; after these EPA statements, they voted to join it by an overwhelming majority. The rates for the BWD since joining the Cooperative have gone up by 10%, reflecting the water that the BWD had to purchase from the Cooperative after it shut down 60% of its capacity. These kinds of cost increases will continue.

5. Corrective action and how this would benefit the public.

If the EPA were to publicize the truth about the health risks of perchlorate at the < 1 ppb levels that are found infrequently near the BWD wells, and, particularly its carcinogen status, the newspapers would have to follow suit and the BWD could reassure the public about perchlorate and, thus, begin using its wells.

I thank you for your consideration.

Sincerely,

George Seaver
Cataumet, MA

Jean Crocker
Cotuit, MA