

January 13, 2000

EPA-SAB-EC-COM-00-003

Ms. Carol Browner
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Subject: Commentary on the Agency's Proposed Drinking
 Water Standard for Radon

Dear Ms. Browner:

As you know, under the provisions of the Safe Drinking Water Act (SDWA), the Agency is charged with consulting with the Science Advisory Board (SAB) prior to proposal of a drinking water standard, and the SAB is charged with responding as it deems appropriate. This Commentary constitutes the SAB's response to the Agency's recent issuing of a proposed drinking water standard for radon.

We have determined that a formal review of the proposed standard by the Board is not necessary at this point. Over the past decade, Committees of the SAB have sent to you more than two dozen reports on radon, its risks, and its mitigation, including a review prompted by Senators Chafee and Lautenberg. In the process, the science surrounding the risk assessment and risk management of this issue has been subjected to numerous reviews by the Board. After hearing an Agency briefing to the Radiation Advisory Committee earlier this month, two of us (Dr. Bull, Drinking Water Committee Chair, and Dr. Johnson, Radiation Advisory Committee Chair) are satisfied that the science underlying the proposed rule has been adequately reviewed through these numerous earlier SAB reports.

While we are comfortable in not conducting a formal review of the proposed radon rule -- because of the extent of the Board's earlier involvement--, we are concerned that, in this case, the Board had been inadequately alerted to the scheduling of events surrounding the rule. If we had determined, in fact, that an SAB review would have been necessary, the Board would have been hard-pressed to conduct a rigorous review in the time remaining before promulgation.

Therefore, we encourage the Agency to be more forthcoming in sharing plans, schedules, and expectations relative to issuance of drinking water standards in the future. For example, it is our understanding that the Agency is planning to propose standards for arsenic and copper during the

current fiscal year. We look forward to working with the Agency in conducting rigorous reviews of the science underlying and incorporated into those proposals, should the SAB judge that such a review is necessary. In contrast to its 26 reports on radon over the past decade, the SAB has sent you six reports on arsenic and only one on copper during the same time period. Therefore, it is more likely that the SAB will have a substantive contribution to make in these cases than it has in the case of radon.

We look forward to the response of the Assistant Administrator for Water to this Commentary and to working with the Agency in carefully planning value-added reviews of future proposed standards.

Sincerely,

/signed/

Dr. Joan M. Daisey, Chair
Science Advisory Board

/signed/

Dr. Richard Bull, Chair
Drinking Water Committee
Science Advisory Board

/signed/

Dr. Janet Johnson, Chair
Radiation Advisory Committee
Science Advisory Board

NOTICE

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