

EPA Administrator Michael O. Leavitt
US EPA Headquarters 1101A
Ariel Rios Building
1200 Pennsylvania Ave., N.W.
Washington, DC 20460

January 27, 2005

Dear EPA Administrator Leavitt:

We urge EPA to maintain and strengthen its cleanup standards particularly at radioactively contaminated sites.

We ask for your active role in preventing adoption of the draft proposals for radioactive cleanup standards being proposed by the Department of Homeland Security in response to a dirty bomb attack. The guidance, which is expected to be published for comment shortly, is absolutely unacceptable as it would permit dangerously contaminated sites and serve as a precedent for weakening the EPA's existing cleanup standards, especially at Superfund sites.

EPA's current standards, including Superfund, require cleanup to a cancer-incidence risk range of one in a million to one in 10,000 cancers. Some of EPA's radiation standards are expressed in dose and do not exceed 15 millirems per year. Although many of us do not believe that this is protective enough, we strongly oppose any further weakening of it. The latest publicly available DHS draft allows the risk of getting cancer from the "cleaned up" site to be increased to 1 in 4! This is done by reference to international recommendations which would allow contamination to remain at a level of 10,000 millirems per year. DHS would allow routine lifetime annual exposures orders of magnitude higher than current background. As the attached letter indicates this is the equivalent of 50,000 chest x-rays (over 30 years of exposure and even more if people live and work in the area longer).

Attached are letters of opposition to these standards sent to EPA and DHS in December 2004 with supplemental technical details. We ask you to prevent any weakening of EPA's standards and to work to prevent DHS from adopting anything weaker than EPA's risk range.

Sincerely,

National Organizations

Lois Gibbs
Center for Health, Environment & Justice
Falls Church, Virginia

Elizabeth Crowe

Chemical Weapons Working Group
Berea, Kentucky

Richard Miller and Tom Carpenter
Government Accountability Project
Washington DC
Seattle, Washington

Alice Slater
Global Resource Action Center
New York, New York

Jane Browning
Learning Disabilities Association of America
Pittsburgh, Pennsylvania

Tara Thornton
Military Toxics Project
Lewiston, Maine

Carah Ong
Nuclear Age Peace Foundation
Santa Barbara, California

Becky Luening
Women's International League for Peace & Freedom
Humbolt, California

Aimee Boulanger
Women's Voices for the Earth
Bozeman, Montana

State and Regional Organizations

Janet Marsh Zeller
Blue Ridge Environmental Defense League
Glendale Springs, North Carolina

Teresa Mills
Buckeye Environmental Network
Grove City, Ohio

Katie Silberman
Center for Environmental Health
San Francisco, California

Deb Katz
Citizen Awareness Network
Shelburne Falls, Massachusetts

Coila Ash
Creative Commotion: Voices for Social Change
Santa Fe, New Mexico

Cynthia Babich
Del Amo Action Committee
San Pedro, California

Mitzi Bowman
Don't Waste Connecticut
New Haven, Connecticut

Tracey Easthope, MPH
Ecology Center
Ann Arbor, Michigan

Jan Conley
Environmental Association for Great Lakes Education
Minneapolis, Minnesota

Judith Johnsrud, PhD
Environmental Coalition on Nuclear Power
State College, Pennsylvania

Albert Huang, Esq.
Environmental Health Coalition
National City, California

Mike Belliveau
Environmental Health Strategy Center
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Daniel Parshley
Glynn Environmental Coalition
Brunswick, Georgia

Max Obuszewski
Hiroshima-Nagasaki Commemoration Committee
Baltimore, Maryland

Helen F. Norris

Holyoke City Councilor
Holyoke, Massachusetts

Jan Conley
Lake Superior Greens
Minneapolis, Minnesota

Kathryn Moyes
Lawrence Environmental Action Group, Inc.
Lawrence, Massachusetts

Cynthia Valencic
Legal Environmental Assistance Foundation
Tallahassee, Florida

Kathryn Moyes
Merrimack Valley Environmental Coalition
North Andover, Massachusetts

Lana Pollack
Michigan Environmental Council
Lansing, Michigan

Phyllis Glazer
Mothers Organized to Stop Environmental Sins
INCLUDE TOWN AND STATE

Joel Shufro
New York Committee for Occupational Safety & Health
New York, New York

Jason Babbie
New York Public Interest Research Group
New York, New York

Jim Warren
North Carolina Waste Awareness & Reduction Network
Durham, North Carolina

David Monk
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Eugene, Oregon

Jane Harris
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Matt Scholtes
Peace Action Wisconsin
Milwaukee, Wisconsin

E.M.T. O’Nan
Protect All Children’s Environment
Marion, North Carolina

Brian Imus
Public Interest Research Group in Michigan
Ann Arbor, Michigan

Erin Hamby
Rocky Mountain Peace & Justice Center
Boulder, Colorado

Lynda Marin
Santa Cruz Weapons Inspection Team
Santa Cruz, California

Maureen Mulligan
Small Business Owner
Harrisburg, Pennsylvania

Doug Bullock
Solidarity Committee of the Capital District
Albany, New York

Inese Holte
TOXIC
Duluth, Minnesota

Matthew Wilson
Toxics Action Center
Boston, Massachusetts

Iris Salinas
La Raza Unida
Mission, Texas

Greg Wingard
Waste Action Project
Seattle, Washington

Honorable Tom Ridge
US Department of Homeland Security
Washington DC 20528

January 27, 2005

Dear Secretary Ridge:

We call on you to reject draft guidance for cleaning up "dirty bombs" that would allow cancer risk levels as high as 1 in 4 people. Such risks are completely unacceptable regardless of the cause of the contamination.

We live in communities impacted by hazardous, and in some cases, radioactive materials. Some of us are already living at or beyond the Environmental Protection Agency's "acceptable" cancer risk levels of 1 in a million to 1 in 10,000 at Superfund sites. It is unacceptable for DHS to even consider permitting radioactive dirty bomb contamination at levels higher than EPA's current cancer risk range.

The most recent DHS draft that has been made public indicates that DHS should rely on international and national recommendations to set permissible contamination levels, but ignores EPA's recommendation that cleanups be required to be at least as protective as Superfund sites.

We are especially concerned that such guidance will be used to weaken existing EPA cleanup standards. There is continual pressure to allow more contamination at "cleaned up" sites and we foresee and oppose the use of the DHS dirty bomb cleanup levels to justify less protection at both radioactive and hazardous sites in this country.

We add our voices to the many other concerned organizations that contacted EPA and DHS in December 2004 on this matter expressing concern "that such lax cleanup standards, with associated high radiation and cancer risk levels, would even be considered. We urge you to assure that no cleanup guidance is adopted that—implicitly or explicitly—would permit radiation doses to the public of the magnitudes considered in earlier drafts."

Attached are a summary of EPA's radiation protection standards and charts comparing the risks proposed by EPA versus those envisioned in the DHS rough draft and interim final draft guidance on dirty bomb cleanups as well as the letters of concern sent to EPA and DHS in December 2004. Please do not publish draft dirty bomb cleanup guidance that results in less security and safety for the American public.

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