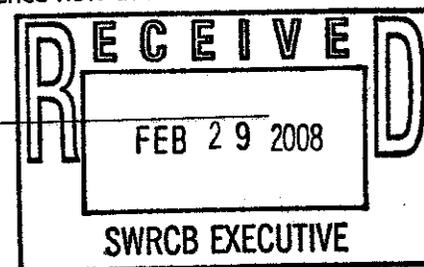


Jeanine Townsend - comment letter on proposed recycled water policy3/18/08 Bd. Mtg. Item 13
Recycle Water Policy
Deadline: 3/10/08 by 12 p.m.

From: Edo McGowan <edo_mcgowan@hotmail.com>
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Date: Friday, February 29, 2008 9:36 AM
Subject: comment letter on proposed recycled water policy

Here is an article that is submitted to the recycled water policy as a response to the request for public comments. In previous comments relating to the Board's draft staff report on the new recycled water policy, it was indicated that by withholding critical information to both to the decision-maker and the public, such denial of critical information would deprive both of these interests of the needed input to fully appraise the impacts from recycled water. The draft staff report fails to discuss the potential for the recycled water to carry pathogens as well as toxic materials that can bioaccumulate, thus potentially influencing not only pathogenesis but also antibiotic resistance. What I see in the Board's draft staff report reflects either an inability or unwillingness to discuss inconvenient information, thus skewing the resultant policy. Accordingly, I think it is important that the report by Maggie Mahar on the CDC be included for the following reason. The California Department of Public Health depends upon the CDC for assistance and if the CDC has been compromised, then that will impact the CDPH's ability to guide the Board, hence the Regional Boards, and thus a potential inability to protect the citizens of this state. Since we are discussing pathogens, toxic materials and water, the ability to tap into the CDC in an accurate and efficient way may be now compromised. This will then potentially influence how this state treats recycled water which contains the potential for carrying both toxins and pathogens.



http://www.thehealthcareblog.com/the_health_care_blog/2008/02/cdc-officials-b.html

February 12, 2008

CDC officials blocked public health report by *Maggie Mahar*

The Center for Public Integrity, a public interest investigative journalism organization, has obtained copies of a Centers for Disease Control and Prevention (CDC) study of environmental and health data in eight Great Lakes states that was scheduled for publication in July 2007. The report, which pointed to elevated rates of lung, colon, and breast cancer; low birth weight; and infant mortality in several of the geographical areas of concern has not yet been made public. A few days before the report was slated to be released, it was pulled. Meanwhile, at precisely the same time, its lead author, Christopher De Rosa, has been removed from the position he held since 1992. The Center for Public Integrity is asking why. The study, "Public Health Implications of Hazardous Substances in Twenty-Six U.S. Great Lakes

Areas of Concern? was developed by the CDC's Agency for Toxic Substances and Disease Registry (ATSDR) at the request of the International Joint Commission, an independent U.S.-Canadian organization that monitors and advises both governments on the use and quality of boundary waters.

The CDC report brings together two sets of data: environmental data on known "areas of concern" -- including superfund sites and hazardous waste dumps -- and separate health data collected by county or, in some cases, smaller geographical regions.

The study does not try to prove cause and effect. Instead, it outlines areas for further study and data collection on the link between pollution and health.

"Let's say we have a superfund site and we also find elevated risk of leukemia in the county -- is that related? We don't know, but people living in the area can logically argue that we ought to find out," Dr. Peter Orris, a professor at the University of Illinois School of Public Health and one of the peer reviewers of the study told Oneworld.net.

Since 2004, dozens of experts have reviewed various drafts of the study, including senior scientists at the CDC, Environmental Protection Agency, and other federal agencies, as well as scientists from universities and state governments, according to consumeraffairs.com. Orris is just one of the several experts who reviewed the study and who, along with the International Joint Committee in a December letter to the CDC, have called for the report's publication.

Canadian biologist Michael Gilbertson, a second peer reviewer, told the Center for Public Integrity that he felt the findings were being suppressed because they were "inconvenient." On the record, he added: "The whole problem with all this kind of work is wrapped up in that word 'injury.' If you have injury, that implies liability. Liability, of course, implies damages, legal processes, and costs of remedial action. The governments, frankly, in both countries are so heavily aligned with, particularly, the chemical industry, that the word amongst the bureaucracies is that they really do not want any evidence of effect or injury to be allowed out there."

Orris also raised concerns that the publication may have been halted based on orders outside the CDC. Once again, it seems that the Bush administration is trying to shrink government by making sure that a federal agency doesn't do its job? a problem that I wrote about here in a post titled [?The FDA-- What Happens When You Starve the Beast? Corporate interests are protected--at the expense of the nation's citizens.](#)

"I have an overall concern with respect to the culture of this administration, which permeates all levels of the scientific wing of the government," Orris said. "The administration has regularly cut funds so that they don't find statistics that could be potentially politically embarrassing -- for instance, the sampling of toxins in fish in the Great Lakes has been cut way back."

"If the messenger doesn't come with the message, no one knows it's there," he added.

CDC spokesperson Bernadette Burden told OneWorld that the report was held back because internal and external reviewers -- including the Environmental Protection Agency and several state health departments -- identified "numerous discrepancies and deficiencies" and determined a rigorous review was needed. She added that the CDC plans to release the report after the review is completed, in "weeks rather than months."

Burden cited several examples of "discrepancies", including the fact that the county-level health data "reflected people's illnesses from 1988 to 1997, while much of the environmental data used in the report came from the EPA's Toxic Release Inventory dated 2001 and the National Pollutant Discharge Elimination system with 2004 data."

As Oneworld.net points out, CDC did not clarify why these issues were not identified until July 2007 despite several years of review.

A new director of CDC's National Center for Environmental Health and ATSDR, Howard Frumkin, was appointed in July 2007, shortly before the report was due to be released. He replaced De Rosa, who had served as director of the Division of Toxicology for fifteen years. De Rosa was named special assistant in Frumkin's office -- a position that appears to carry "no real responsibilities" according to a Feb. 2008 letter from members of the Congressional Committee on Science and Technologies to CDC director Julie Gerberding. The letter called the move an apparent retaliation.

As many as 9 million people -- including residents of Chicago, Cleveland, Detroit, and Milwaukee -- may be at risk from exposure to pollutants including pesticides, dioxin, PCBs (Polychlorinated Biphenyls), and mercury, according to Sheila Kaplan, an investigative journalist who covered the story for the Center for Public Integrity.

Kaplan has read all three drafts of the study, from 2004 to 2007.

"It's important for this work to be followed up on," she told OneWorld. "What I hope from this report is that communities will say, 'We deserve to know this information and whether exposure to these chemicals and metals is killing us.' More work needs to be done."

You will find Kaplan's full report [here](#).

Maggie Mahar is an award winning journalist and author. A frequent contributor to THCB, her work has appeared in the New York Times, Barron's and Institutional Investor. She is the author of