ILLINOIS POLLUTION CONTROL BOARD May 22, 1986

PCB 86-41

VILLAGE OF LAKE ZURICH,)
)
Petitioner,)
)
v .)
)
ILLINOIS ENVIRONMENTAL)
PROTECTION AGENCY,)
)
Respondent.)

DISSENTING OPINION (by J. D. Dumelle):

The majority has found that the health risks at the radium content of the Lake Zurich water to be "minimal" (p. 5). I disagree. Radium is a carcinogen and has no threshold for its effects. There are real risks.

The Federal Register of August 14, 1975 gives the risk as "between 0.7 and 3 fatal cancers annually per million exposed persons" at 5 pCi/l of combined radium. Lake Zurich has water at 5.7 pCi/l so the risk would rise slightly to 0.8 to 3.4, averaging 2.1.

Thus every year new residents drink the water an individual cancer risk of 2.1 per million or 1-in-476,000 will occur. The variance runs for almost 5 years and the risk over that period becomes 1-in-92,000 for someone beginning to drink the water in 1986. Does the public really understand that this risk exists?

It is quite possible that the risk given above is understated. The Agency does not cite or provide two recent studies on cancer (including leukemia) and radium in drinking water. The respected <u>Journal of the American Medical Association</u> on August 2, 1985 carried a paper titled "Association of Leukemia with Radium Groundwater Contamination" and is authored by a physician, Dr. Gary H. Lyman and others. The article points out that "A significant association between leukemia incidence and the extent of groundwater incidence and the extent of groundwater contamination with radium is reported herein." It urges further studies.

A related paper is "Drinking Water and Cancer Incidence in Iowa" by Dr. Judy A. Bean and others. This appeared in the <u>American Journal of Epidemiology</u> (Vol. 116, No. 6). A conclusion was "Incidence rates of cancers of the lung and bladder among males and of cancers of the breast and lung among females were The USEPA is currently evaluating the radium standard. It may well find these two studies and others so convincing that the radium standard will be tightened in 1987.

A major point at issue in this and related proceedings is whether a "threshold" exists for ionizing radiation effects. The Agency's principal technical witness, Dr. Richard E. Toohey, feels that there is a threshold.

The April 26, 1986 explosion at the Chernobyl nuclear plant in the Ukraine has raised this same issue. The <u>New York Times</u> of May 18, 1986 in an article by Malcolm W. Browne sums up the controversy as follows:

> The long term effects of relatively small doses of radiation include increased susceptibility to cancer, but these effects are hard to quantify and remain the subject of scientific controversy. According to one school of thought, there may be a threshold of ionizing radiation below which tissues are able to repair themselves, leaving a person essentially unscathed. But an opposing view is that any amount of ionizing radiation, however small, inevitably causes damage of the kind that can lead to genetic disruptions and cancer. The difference between these views accounts for the widely varying predictions of the global total of cancer cases from Chernobyl's fallout.

The USEPA risk estimate, mentioned above, is an <u>annual</u> risk. It is based upon the "no threshold" theory.

I agree that there is no threshold for radiation effects. Because there is a real risk to people of cancer and leukemia from the Lake Zurich drinking water I dissent.

Chairman

Jacob D. Dumelle, P.E

70-45

I, Dorothy M. Gunn, Clerk of the Illinois Pollution Control Board, hereby certify that the above Dissenting Opinion was filed on the ______ day of ______ 1986.

Dorothy M. Jun

Dorothy M. Gunn, Clerk Illinois Pollution Control Board