

Record Type: Record

To: John F. Morrall III/OMB/EOP@EOP

cc:

Subject: Costs and Benefits of Federal Regulations

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Office of Management and Budget John Morrall Office of Information and Regulatory Affairs, OMB, NEOB, Room 10235 725 17th Street, NW, Washington, DC 20523

Office of Management and Budget Morrall:

I understand the March 28 Federal Register contains a notice concerning an OMB draft report on the Costs and Benefits of Federal Regulation. I appreciate your request for comments and wish to submit the following recommendations regarding regulations that should be reformed.

- (1) The Endangered Species Act
- (2) The Resources Conservation and Recovery Act (specifically "listed waste," EPA totally misconstrued what Congress said to do creating a nightmare)
- (3) The Comprehensive Environmental Response, Compensation and Recovery Act (retroactive liability is unconstitutional)
- (4) The Arsenic MCL under the SDWA (based entirely on bogus epidemology (about 40-years old) extrapolated by a 60-year-old (!) hypothesis of cancer causation that never had justification and now is inconsistent with a large body (50 years worth) of well founded science). [You would think that the NAS-NRC would use people who read and understand the current literature.]

Sincerely,

George E. Parris, Ph.D,

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