

REPORTED REQUEST FOR RFC #: 12385

Request for Correction: I HAVE REVIEWED THE FIRST 50 HITS USING YOUR SEARCH ENGINE, AND HAVE PROVIDED ONLY HITS THAT ARE MISLEADING OR INCORRECT AS TO THE CARCINOGENICITY OF "BROMATE":

<[HTTP://WWW.EPA.GOV/SAFEWATER/HFACTS.HTML](http://www.epa.gov/safewater/hfacts.html)>

"BROMATE. SOME PEOPLE WHO DRINK WATER CONTAINING BROMATE IN EXCESS OF EPA'S STANDARD OVER MANY YEARS MAY HAVE AN INCREASED RISK OF GETTING CANCER."

<[HTTP://WWW.EPA.GOV/ORD/RESPLANS/MICROBIAL.PDF](http://www.epa.gov/ord/resplans/microbial.pdf)>

"FOR EXAMPLE, IT WAS ONLY RECENTLY RECOGNIZED THAT OZONE DISINFECTION CAN PRODUCE BROMATE, AN ION WHICH MAY POSE SIGNIFICANT HEALTH RISKS."

<[HTTP://WWW.EPA.GOV/IRIS/SUBST/1002.HTM](http://www.epa.gov/iris/subst/1002.htm)> &

<[HTTP://WWW.EPA.GOV/IRIS/TOXREVIEWS/1002-TR.PDF](http://www.epa.gov/iris/toxreviews/1002-tr.pdf)>

PAGE TITLE "BROMATE" BUT ONLY POTASSIUM BROMATE WAS SHOWN TO BE CARCINOGENIC. SODIUM BROMATE HAS NOT BEEN SHOWN TO BE CARCINOGENIC. ALL DOCUMENTATION LISTED THAT SHOWS CARCINOGENICITY USED POTASSIUM BROMATE.

<[HTTP://WWW.EPA.GOV/SAFEWATER/MCL.HTML](http://www.epa.gov/safewater/mcl.html)>

"BROMATE ZERO 0.010 INCREASED RISK OF CANCER BYPRODUCT OF DRINKING WATER DISINFECTION"

<[HTTP://WWW.EPA.GOV/SAFEWATER/MDBP/DBP1.HTML](http://www.epa.gov/safewater/mdbp/dbp1.html)>

"RESULTS FROM TOXICOLOGY STUDIES HAVE SHOWN SEVERAL DBPS (E.G., BROMODICHLOROMETHANE, BROMOFORM, CHLOROFORM, DICHLOROACETIC ACID, AND BROMATE) TO BE CARCINOGENIC IN LABORATORY ANIMALS."

<[HTTP://WWW.EPA.GOV/SAFEWATER/MDBP/ALTERNATIVE_DISINFECTANTS_GUIDANCE.PDF](http://www.epa.gov/safewater/mdbp/alternative_disinfectants_guidance.pdf)>

"BROMATE ZERO 0.0104 CANCER OZONATION BYPRODUCT"

<[HTTP://ES.EPA.GOV/NCER/PUBLICATIONS/TOPICAL/DRINKING.HTML](http://es.epa.gov/ncer/publications/topical/drinking.html)> &

<[HTTP://ES.EPA.GOV/NCER/PROGRESS/GRANTS/98/DRINKING/WESTERHOFF99.HTML](http://es.epa.gov/ncer/progress/grants/98/drinking/westerhoff99.html)>

"OZONE (O3) IS AN EFFECTIVE DISINFECTANT, BUT IT CAN FORM CARCINOGENIC BY-PRODUCTS SUCH AS BROMATE.>

<[HTTP://CFPUB.EPA.GOV/IRIS/QUICKVIEW.CFM?SUBSTANCE_NBR=1002#REFORAL](http://cfpub.epa.gov/iris/quickview.cfm?substance_nbr=1002#reforal)>

"B2 (PROBABLE HUMAN CARCINOGEN - BASED ON SUFFICIENT EVIDENCE OF CARCINOGENICITY IN ANIMALS)"

THE PAPER REFERRED TO - "38. STUDIES ON MECHANISMS OF POTASSIUM BROMATE-INDUCED MESOTHELIAL CARCINOGENESIS IN THE MALE F344 RAT

DIS 02-08 AAI3033645 NDN- 135-0259-4970-2" USED ONLY POTASSIUM BROMATE.

Compliance with IQGs: THESE DOCUMENTS PRESENT BROMATE IN ALL FORMS AS BEING A CARCINOGEN. THE STUDIES THAT HAVE USED SODIUM BROMATE HAVE NOT FOUND MUTAGENIC ACTIVITY, NOR HAVE THEY PROVIDED EVIDENCE OF SODIUM BROMATE AS BEING A CARCINOGEN. THEREFORE CLAIMS AGAINST BROMATES BEING CARCINOGENS ARE UNFOUNDED. ONLY POTASSIUM BROMATE IS A CARCINOGEN, AS WELL DOCUMENTED BY THE LITERATURE.

Recommendation: * SET THE MCL FOR BROMATE TO 1.0 MG/L.

* ESTABLISH A PRELIMINARY LIMIT ON THE AMOUNT OF POTASSIUM IN DRINKING WATER, NOTING THAT POTASSIUM IS STILL A NECESSARY NUTRIENT.

* CORRECT DOCUMENTS ON THE EPA WEBSITE TO REPRESENT POTASSIUM BROMATE AS A CARCINOGEN, AND SAY NOTHING ABOUT *ALL BROMATES* THAT IS NOT BASED ON SCIENTIFIC FACT. BROMATE IS PRODUCED AS A RESULT OF OZONATION (AND MANY OTHER PROCESSES), SO THAT SHOULD STAND.

Impact: AS A COMPANY, AND AS A MEMBER OF THE OZONE COMMUNITY, THE CURRENT ERROR HAS COST US A LOT OF BUSINESS. OZONE IS BEING RELEGATED TO A MUCH SMALLER PORTION OF MUNICIPAL WATER SYSTEMS.

AS A MEMBER OF THE HUMAN RACE, THE ERROR IS CAUSING THE INCREASED USE OF MERCURY-FILLED TUBES (UV LAMPS), WHICH ADDS MERCURY TO MY ENVIRONMENT IN LAND FILLS. THESE TUBES ARE NOT AS ENERGY EFFICIENT AS OZONE, AND THEREFORE CONSUMES MORE POWER. THIS POWER IS CONSUMING FOSSIL FUEL, SINCE NUCLEAR AND RENEWABLE ENERGY POWER PLANTS ARE NOT BEING BUILT VERY FAST. INSTRUMENTATION OF MUNICIPAL PLANTS BECOMES EVER MORE COMPLEX TO MONITOR THE PRODUCTION OF BROMATE, AND THIS BECOMES AN INCREASE IN MY UTILITY COSTS.

RFC # 12385 WAS SUBMITTED BY:

DAVID A. SMITH SMITH, PHONE: 6235878858 , EMAIL: SMITH@GDT-H2O.COM, ADDRESS: 2210 E. MARCONI, PHOENIX, AZ 85022, FAX: 6235871511, ORGANIZATION: GDT CORPORATION, AFFILIATION: NOT GIVEN

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If you have questions about this request, please feel free to contact Kimberlie R. Orr at (202)566-1703 or orr.kimberlie@epa.gov.

IQG Processing Staff