



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D C 20460

April 26, 1985

Honorable Lee M. Thomas
Administrator
U. S. Environmental Protection Agency
401 M. Street S. W.
Washington, D.C. 20460

OFFICE OF
THE ADMINISTRATOR

Dear Mr. Thomas:

The Radiation Advisory Committee of the Science Advisory Board was recently established to review the technical basis of EPA's radiation rulemakings and to provide advice on the Agency's radiation research program. The Committee is concerned over long-term trends in funding for radiation activities. At its first meeting of February 4, 1985, the Committee learned that the Office of Radiation Programs' resources had been repeatedly reduced. At its second meeting, the Committee learned that EPA's Health Effect Research Laboratory's nonionizing radiation research program will be eliminated in FY'86.

We would like to convey to you our strong concern that this unique research capability will be lost if this action is carried out. The decision to cease research in this area goes counter to the advice given by the SAB earlier and counter to the Agency's need to maintain an analytical and research capability if it is to make informed regulatory decisions. In addition, advances in the field of nonionizing research are changing our understanding of the biological mechanisms at work.

EPA should continue and strengthen its program of extramural research and also its in-house research on the health effects of radiofrequency radiation. This is necessary not only to keep abreast of the field but also because the research itself is invaluable to the nation, as attested by the fact that a considerable part of the scientific results reported in its recent (1984) review of the field derives from work done at EPA's own laboratories.

Among possible topics for future research, the Committee enumerates the following.

- a. Effects of modulation imposed on radiofrequency carriers, particularly modulation at very low frequencies, on biological specimens exposed to very low power densities.
- b. Effects of chronic vs. acute exposures, and of partial-body vs. whole-body exposures.

c. Effects of exposure to pulsed sources of very high peak power vs. sources that are adequately characterized by average power.

d. Synergistic effects of radiofrequency energy with other physical and chemical agents.

e. Testing the validity of recent results with regard to mutagenic and similar effects observed at low power densities.

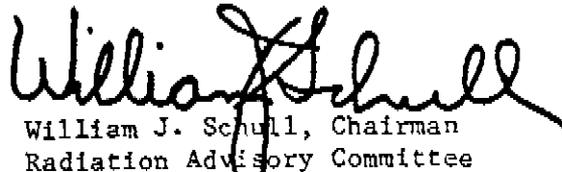
f. Evaluation of the thermoregulatory capability and concomitant physiological processes of various populations exposed under extreme environmental conditions.

Inasmuch as results of recent investigations in this field have served to confirm the importance of these topics for the decision-making that support the establishment of nonionizing radiation protection guidance, the Radiation Advisory Committee reiterates the importance of the Agency's own research in this field, especially in-house research. We understand that the guidance now being developed does not address low-level and modulation effects because the information to make judgments on how to address them is not yet available. It is reasonable to use currently available information to protect public health while continuing to explore unknowns. It is quite another thing to acknowledge that information is needed and simultaneously eliminate the principal resource for collecting that information--EPA's own laboratories.

The Committee understands the pressure exerted on the Agency to eliminate this item in FY'86, but points out that this research is clearly in the national interest and is consistent with EPA's mission.

Accordingly, the Committee strongly urges you to review the Agency's decision and to reinstate at least the in-house portion of the Agency's research effort.

Sincerely,


William J. Schull, Chairman
Radiation Advisory Committee


Norton Nelson, Chairman
Executive Committee
Science Advisory Board

cc: Radiation Advisory Committee