

Comment from Dr. James Opaluch, received 09.22.14

On page 6 under the heading "Significant and significant nexus", the letter says "Panel members found that the term "significant nexus" was poorly defined in the proposed rule ...". The letter to the Administrator goes on to say "significant nexus is not a scientific term but rather legal term" (NOTE THE MISSING "A"-- it should be "... rather a legal term")

"Significant nexus" is defined to be "" on page 22274, which indicates "The term significant nexus means that a water. .. significantly affects the chemical, physical, or biological integrity ..."

If the panel is to conclude that "significant nexus" is poorly defined, and is a legal term not a scientific one, I believe that they should to indicate more specifically why "significantly affecting the chemical physical or biological integrity" is not a good scientific definition--other than the term "significant" being vague.