



January 22, 2013

Michael Baes
Pesticide and Environmental Toxicology Branch
Office of Environmental Health Hazard Assessment
California Environmental Protection Agency
1515 Clay St., 16th floor
Oakland, California 94612
Attention: PHG Project

Submitted via email to michael.baes@oehha.ca.gov

111 New Montgomery Street, Suite 600
San Francisco, CA 94105
415-369-9160 (P) 415-369-9180 (F)
www.cleanwateraction.org

Re: Draft Public Health Goal for Perchlorate - Support

Dear Mr. Baes,

On behalf of Clean Water Action and our 52,000 California members, I am writing to express our strong support for the Office of Environmental Health Hazard Assessment's (OEHHA) proposal to lower the Public Health Goal (PHG) for perchlorate to 1 part per billion (ppb). We urge you to move quickly to formally adopt this revision.

As you are aware, perchlorate can interfere with the thyroid's ability to take up iodine needed to produce thyroid hormone. This is a particular threat to fetuses, infants, and young children because even a short period of decreased thyroid hormone can result in irreversible developmental problems.

Clean Water Action has long held that a perchlorate PHG higher than 1 ppb is not adequately protective of vulnerable populations, most notably infants and small children. Research since California's current PHG was established (Blount 2006a, Centers for Disease Control and Prevention 2006, Pearce 2007) confirms this conclusion by demonstrating that:

- exposure to perchlorate, even at very low levels can interfere in the production of thyroid hormone,
- a substantial portion of the population is vulnerable to the health risks associated with such disruption due to perchlorate in drinking water and through other sources such as food (including breast milk),
- the prevalence of iodine deficiency in the population puts more people at risk, especially breast feeding babies who are not receiving adequate iodine from their mothers.

Clean Water Action contends that OEHHA's proposed 1ppb PHG is scientifically based. We particularly approve of the agency's decision to employ an uncertainty factor of 10 (OEHHA 2011) given the limitations of the Greer study on which much of OEHHA's conclusions are

based. We also applaud consideration of both direct and indirect water consumption in establishing the lower PGH.

For the last decade Clean Water Action has worked with communities impacted by perchlorate contamination in their drinking water. We believe that everyone living under these conditions deserves to be protected, including the most vulnerable. It is on their behalf that we urge OEHHA to avoid further delay and to adopt the new PHG of 1 ppb with all expedience.

Sincerely,

A handwritten signature in cursive script that reads "Andria Ventura".

Andria Ventura
Toxics Program Manager