

Public Utilities Department
Administration

February 22, 2011

Michael Baes (mbaes@oehha.ca.gov)
Pesticide and Environmental Toxicology Branch
Office of Environmental Health Hazard Assessment
California Environmental Protection Agency
1515 Clay St., 16th floor
Oakland, California 94612

Re: Proposed Public Health Goal for Perchlorate in Drinking Water

Dear Mr. Baes:

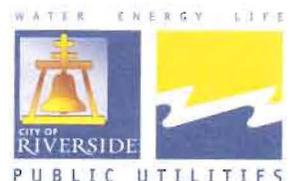
The City of Riverside appreciates the opportunity to comment on the proposed public health goal (PHG) for perchlorate in drinking water. The City of Riverside is the largest City in inland southern California, serving approximately 300,000 customers through 63,500 water service connections, within a service area of 75 square miles. Riverside is an active member of the Association of California Water Agencies, (ACWA). We fully support the comments submitted by ACWA regarding the proposed perchlorate PHG, and incorporate them herein to this comment letter by reference.

Riverside presently produces groundwater from basins that contain levels of perchlorate which exceed the current California MCL. Riverside treats approximately 24,766 acre feet of perchlorate contaminated groundwater annually for delivery to our customers. Riverside's treated water fully complies with the State MCL for perchlorate. Riverside understands that OEHHA's analysis relied on ecological studies which utilized occurrence data from CDPH files, which in many cases represents untreated water sources. The data from untreated water sources does not represent the quality of water served by Riverside to its customers as these sources are treated to remove perchlorate before drinking water is distributed. Therefore, Riverside feels that the authors of the ecological studies (Steinmaus et al. 2010, Buffler et al. 2006, etc.) could not have appropriately correlated perchlorate concentrations with populations served.

The improper use of data from CDPH's databases is an issue that continues to create invalid and erroneous assumptions on the drinking water supplied to our customers. Drinking water standards, goals, and policies must not be based on the misinterpretation of this data. Recent press given to inaccurate reports developed by NGOs is a perfect example of the misuse of the data in the CDPH's database. Therefore, Riverside requests that OEHHA reevaluate the validity of the ecological studies in its analysis of the proposed perchlorate PHG.

Riverside Public Utilities is Committed to the Highest Quality Water and Electric Services at the Lowest Possible Rates to Benefit the Community

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Riverside's highest priority is the protection of public health while ensuring a reliable water supply to its customers. Riverside supports the work of OEHHA in developing appropriate risk assessments for all drinking water contaminants and looks forward to working with you to address this very important issue. Please contact me at (951) 826-5780 if you have any questions, or if I can provide additional information.

Respectfully,

A handwritten signature in black ink, appearing to read 'KS Milligan', with a stylized flourish at the end.

Kevin S. Milligan, P.E.
Utilities Assistant General Manager - Water