



March 9, 2011

Mr. Allan Hirsch  
Chief Deputy Director  
Office of Environmental Health Hazard Assessment  
1001 I Street  
P.O. Box 2815  
Sacramento, CA 95812-2815

Re: Request for External Peer Review of the Proposed Draft of the Revised Public Health Goal for Perchlorate

Dear Mr. Hirsch:

A proposed draft of a revised Public Health Goal (PHG) for perchlorate in drinking water was released for public comment on January 7, 2011, which was followed by a public hearing held in Oakland on February 23, 2011, the deadline for public comment. The Perchlorate Study Group (PSG) and the Partnership for Sound Science in Environmental Policy (PSSEP) each submitted written comments on the proposed new PHG and participated in the public hearing. As a follow-up to that public hearing, both the PSG and PSSEP hereby jointly request that the Office of Environmental Health Hazard Assessment (OEHHA) submit the risk assessment for the newly proposed draft PHG for perchlorate to external scientific peer review pursuant to California Health & Safety Code Section 116365 (c) (3) (D) before taking any further action on the draft PHG.

Both organizations' comments highlighted the preponderance of scientific evidence demonstrating that lowering the existing PHG will provide no additional benefits to public health. We each also identified a number of serious scientific flaws and misplaced assumptions in OEHHA's analysis. Numerous other interested parties raised similar scientific concerns. Because OEHHA's risk assessment was *not* based upon the best available science it is critical that the draft risk assessment be evaluated by an independent, external scientific peer review panel.

In accordance with the requirements of state law, as cited above, our joint request for external scientific peer review is hereby submitted via email within fifteen calendar days of the public hearing on the proposed PHG which, as noted, took place on February 23, 2011. The PSG will fund the cost of the requested external scientific peer review and seeks to enter into an "enforceable agreement" with OEHHA within fifteen calendar days of the date of this request for

peer review requiring the PSG “to fully reimburse” OEHHA “for the costs associated with conducting the external scientific peer review.”

Please contact Clif McFarland of the law firm of Downey Brand, LLP at the address and phone number provided in the email containing this letter at OEHHA’s earliest convenience to arrange for compliance with this request within fifteen days of OEHHA’s receipt of this letter, as specified in California Health & Safety Code Section 116365 (c) (3) (D).

Thank you for consideration of our joint request for external scientific peer review.

Sincerely,



Larry Cummings  
Chair, Perchlorate Study Group



Craig Johns  
Program Manager,  
Partnership for Sound Science in  
Environmental Policy

cc: Dr. George Alexeeff, Acting Director, Office of Environmental Health Hazard Assessment