



PERCHLORATE STUDY GROUP

A coalition of aerospace, defense,
chemical and allied industries

February 23, 2011

Dr. George Alexeeff
Acting Director, OEHHA
1001 I Street
Sacramento, CA 95812-2815

Dear Dr. Alexeeff:

Attached please find the Perchlorate Study Group's response to the request for comments by OEHHA relating to the proposed reduction of the public health goal (PHG) for perchlorate in drinking water.

Several overarching points merit emphasis:

- Nowhere in OEHHA's document does it show that California's current perchlorate standard is not health protective or that lowering the public health goal from 6 parts per billion in water to 1 ppb will offer any additional health benefit.
- California's existing PHG and drinking water standard of 6 ppb is exceptionally protective. The California PHG was derived based on a series of conservative risk assessment factors, significantly beyond customary regulatory practice.
- The National Academy of Science (NAS) concluded that there is no evidence that perchlorate doses below 245 ppb (40 times greater than the current PHG) will have *any* health effect—much less an adverse effect—in humans.
- No new science has emerged that changes the fundamental toxicology and pharmacology of perchlorate; therefore the findings of the 2005 NAS comprehensive review of the science on perchlorate and human health effects remain valid today.

We have also identified serious concerns with several of the assumptions and scientific reports OEHHA has relied on in its draft risk assessment. These are explained in great detail in the attached comments.

Thank you in advance for your consideration. We look forward to working with you to ensure the best available toxicological data in the scientific literature is used in considering the perchlorate PHG.

Very truly yours,

Larry Cummings
Chair, Perchlorate Study Group