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Environmental Working Group comments on the California Office of Environmental Health Hazard Assessment's draft version of CalEnviroScreen 4.0.

Submitted via electronic docket at <https://oehha.ca.gov/comments>

The Environmental Working Group, a nonprofit research and policy organization with offices in San Francisco, Sacramento, Minneapolis and Washington, D.C., submits these comments to the California Office of Environmental Health Hazard Assessment on the new draft version of CalEnviroScreen 4.0.

EWG supports the CalEnviroScreen methodology of identifying disproportionate exposures to environmental contaminants in communities that may be burdened by multiple sources of pollution. We also applaud OEHHA's continued efforts to improve and revise CalEnviroScreen and incorporation of new sources of environmental exposure data as they become available.

EWG particularly supports the focus on children's exposure to lead in the draft CalEnviroScreen 4.0. As EWG has reported, in the past California has not taken the measures needed to screen and protect all young children from lead exposure, especially those in socially vulnerable communities.¹ Developing a dataset to identify the risk of lead exposure from paint in housing is important, given that lead-based paint is one of most common routes of exposure. For lead exposures from drinking water, inclusion of 90th percentile values from lead monitoring data in CalEnviroScreen is an important first step toward identifying communities with problematic drinking water exposures at the tap. However, CalEnviroScreen methodology must not stop there. The 90th percentile values for lead measurements at the tap may obscure the most severe cases of high lead concentrations in drinking water at individual locations. Thus, EWG urges OEHHA to include both the 90th percentile values and the full range of lead monitoring results in the lead exposure metric. Additionally, in order to comprehensively estimate the scope of potential exposures to lead from drinking water, EWG suggests that OEHHA include in CalEnviroScreen methodology data regarding the presence of any lead service lines and lead pipe fittings in the census tract and within community service water boundaries.

Further, EWG supports the addition of chrome plating facilities to the Hazardous Waste Generators and Facilities sites in the CalEnviroScreen metrics. The latest research has demonstrated that, in addition to air and water emissions of hazardous metals from these sites, chrome plating facilities are highly likely to discharge per- and polyfluoroalkyl substances, or PFAS, chemicals associated with a variety of adverse impacts on human health. Reports by EWG and other organizations in California have documented that PFAS pollution is a threat to

¹ Environmental Working Group. 2020. Bill requires California to test millions of children for lead exposure. www.ewg.org/news-insights/news-release/bill-requires-california-test-millions-children-lead-exposure



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California drinking water supplies.² Thus, identifying sites, facilities and industries that may discharge pollutants into California's environment is an essential part of protecting the state's precious water resources. Including ambient groundwater data in CalEnviroScreen also helps this goal, as groundwater data provide a more comprehensive source of information on water quality for community water systems and private wells, as well as non-community water systems that serve a variety of locations, including parks and campgrounds.

In conclusion, EWG applauds OEHHA's efforts to help ensure equity and justice for California's most vulnerable communities, who have experienced a historical burden of pollution and disparities in environmental exposures.

Submitted on behalf of the Environmental Working Group,

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² Environmental Working Group. 2019. Toxic 'Forever Chemicals' Detected in Drinking Water Supplies Across California. <https://www.ewg.org/research/toxic-forever-chemicals-detected-drinking-water-supplies-across-california>