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ORANGE COUNTY WATER DISTRICT
ORANGE COUNTY'S GROUNDWATER AUTHORITY

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August 29, 2023

Hermelinda Jimenez
Pesticide and Environmental Toxicology Branch
Office of Environmental Health Hazard Assessment
California Environmental Protection Agency
P.O. Box 4010, MS-12B
1001 I Street,
Sacramento, California 95812
Attention: PHG Program

Transmitted via electronic upload to <https://oehha.ca.gov/water/comments/comment-submissions-second-draft-public-health-goal-pfoapfos>

Subject: Comments on Second Draft Technical Support Document for Proposed Public Health Goals for Perfluorooctanoic Acid and Perfluorooctane Sulfonic Acid in drinking water

Dear Ms. Jimenez,

Orange County Water District (OCWD) provided comments on the Office of Environmental Health Hazard Assessment (OEHHA) First Draft Public Health Goals (PHGs) for Perfluorooctanoic Acid (PFOA) and Perfluorooctane Sulfonic Acid (PFOS) via an electronic letter submittal dated October 27, 2021. Our comments were largely comprised of questions and requests for clarification on the derivation of the PFOA PHG from human epidemiological studies with a renal cell carcinoma (RCC) health endpoint.

A comparison of Section 6.2.1 (Cancer Dose-Response-Analyses and Cancer Potency Derivation - PFOA) between the first and second drafts indicates minimal change where the additional information requested by OCWD would have been most appropriately included. We note some minor text additions justifying the selection of the Shearer et al. (2021) and Vieira et al. (2013) studies as the basis for the PHG over two other human epidemiological studies. However, most of our comments appear unaddressed, including those regarding: 1) OEHHA's direct use of published odds ratio (OR) quartiles unadjusted for other PFAS vs. a consideration of the studies' raw data to derive cancer slope factors (CSFs), 2) the basis for averaging the two CSFs when the studies used different serum determination methodologies (one-time measurement vs modeled), and 3) our request to include a corresponding serum value associated with human exposure to the PFOA PHG drinking water concentration, which would permit a comparison with the serum values described in the two supporting studies.

We continue to believe that the Technical Support Document would be significantly enhanced by including our requested clarifications and addressing our questions. Doing so would enhance public understanding of the PHGs and their underlying scientific basis. Based on correspondence with the PHG Program, we understand that OEHHA will release a response-to-comments document alongside the final technical support document for the PFOA and PFOS PHGs that addresses both the external peer review comments and the public comments on the first and second draft PHGs. We hope that the final support document better reflects our comments to date, and we look forward to reviewing OEHHA's direct responses to comments.

If you have any questions regarding OCWD's comments, please don't hesitate to contact me at jdadakis@ocwd.com or (714) 378-3364

Sincerely,



Jason Dadakis
Executive Director of Water Quality & Technical Resources.