



August 29, 2023

California Office of Environmental and Health Hazard Assessment  
P.O. Box 4010  
Sacramento, CA 95814

**Subject: EMWD Comments on Second Draft of the Public Health Goal for PFOA and PFOS**

To Whom it May Concern:

Eastern Municipal Water District (EMWD) appreciates the opportunity to comment on the California Office of Environmental Health Hazard Assessment (OEHHA) second draft of the technical support document for proposed public health goals (PHGs) for perfluorooctanoic acid (PFOA) and perfluorooctane sulfonic acid (PFOS). EMWD is the water, wastewater, and recycled water service provider to nearly one million people living and working within a 558-square mile service area in western Riverside County and is California's sixth-largest public retail water agency.

Our mission is to deliver value to our customers and the diverse communities we serve by providing safe, reliable, economical, and environmentally sustainable water, wastewater, and recycled water services. Considering this mission, EMWD acknowledges OEHHA's objective to develop PHGs to establish state regulations that provide customers with a reliable, affordable, and safe public water supply and also protect the health of our environment. We also appreciate that regulation of PFOA and PFOS is appropriate and necessary to address issues related to potential human and environmental impacts. However, the State of California must take all appropriate action, through this rulemaking and others, to reduce the resulting and unfair burdens on water utilities and their customers.

It is stated in the OEHHA Report that the proposed PHG will be a of maximum .007 parts per trillion ("PPT") for PFOA and maximum 1.00 PPT for PFOS. As a point of comparison, the U.S. EPA's proposed national primary drinking water regulation requires the concentration of either PFOA or PFOS must be below 4 parts per trillion. This PHG is a significantly more stringent standard that will lead to operational and financial burdens for water providers across the state.

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2270 Trumble Road • P.O. Box 8300 • Perris, CA 92572-8300

T 951.928.3777 • F 951.928.6177 [www.emwd.org](http://www.emwd.org)

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Although the PHGs developed by OEHHA are not a legally enforceable standard, it is widely understood that the PHGs will inform a maximum contaminant level (MCL) to be created and enforced by the State Water Resources Control Board. In addition, to maintain trust among customers, if any source water exceeds a PHG, EMWD treats the water, or discontinues the use of the water source; serving water that exceeds the PHG is not a viable option. Costs that are incurred by water agencies having to meet these standards will undoubtedly be passed on the customers – including our economically disadvantaged, and severely disadvantaged communities, which comprise over one-third of our customers. For these reasons, EMWD would urge OEHHA to further consider adopting a PHG that aligns with the current federal standards.

EMWD appreciates the opportunity to comment on this draft document and would like to reiterate that EMWD supports the goal of providing Californians access to safe, reliable, and affordable drinking water. However, these quality standards should seek to limit the harmful implications that will burden the customers and the communities that water utilities support. If you have any questions or if EMWD could be of service, please feel free to contact me at (951) 928-6130, or by email at [mouwadj@emwd.org](mailto:mouwadj@emwd.org).

Sincerely,

A handwritten signature in black ink that reads "Joe Mouawad". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Joe Mouawad, P.E.  
General Manager