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**ORANGE COUNTY WATER DISTRICT**  
ORANGE COUNTY'S GROUNDWATER AUTHORITY

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July 22, 2019

The Honorable Gavin Newsom  
Governor, State of California  
State Capitol Building, 1st Floor  
Sacramento, CA 95814

Re: AB 756 (C. Garcia) - Public water systems: perfluoroalkyl substances and polyfluoroalkyl substances – **Request for VETO**

Dear Governor Newsom:

The Orange County Water District (OCWD; the District) respectfully request you veto Assembly Bill 756 public water systems: contaminants. AB 756 would unnecessarily require all public water systems to monitor for potentially thousands of per- and polyfluoroalkyl substances (PFAS) that may not have a certified testing method. Furthermore, AB 756 has redundancies to existing public notification processes that are currently working through existing State Water Resources Control Board (SWRCB) requirements.

As part of the comprehensive statewide PFAS Phased Investigation Plan being executed by the SWRCB, PFAS testing orders were issued by the Division of Drinking Water (DDW) in March 2019 to 209 public water systems for the testing of 660 drinking water supply wells. Should the required testing reveal PFOA or PFOS is above the Notification Level, the public water system will then be required under existing law to notify its local governing body within 30 days; DDW also recommends public notification in these cases via public water systems' websites, bill inserts, or annual consumer confidence reports (CCR). As such, the ongoing PFAS Investigation Plan will result in the same type of public dissemination of PFAS testing results that are sought in AB 756. Furthermore, these efforts have been targeted at the communities most likely to be affected by PFAS instead of a statewide unfunded testing mandate for all public water systems.

In addition, AB 756 does not state which PFAS chemicals are required for testing, nor does it specify which analytical method should be used. The recent DDW testing orders require the use of either United States Environmental Protection Agency (EPA) Method 537 Rev 1.1 (14 PFAS compound) or EPA Method 537.1 (18 PFAS compounds), the

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only two methods available for certification by the SWRCB's Environmental Laboratory Accreditation Program (ELAP).

Providing safe drinking water is of the utmost importance for OCWD, and the District is supportive of the current SWRCB PFAS Investigation Plan, which will generate the information necessary to guide the development of future Maximum Contaminant Levels for PFAS chemicals. For these reasons, OCWD respectfully requests you veto AB 756 and direct the SWRCB to work with all stakeholders to update the notification process related to all contaminants, not just PFAS, based upon sound science and collaboration.

Please feel free to contact OCWD Legislative Affairs Liaison Alicia Dunkin at (714) 477-3750 or [adunkin@ocwd.com](mailto:adunkin@ocwd.com), or me, if you have any questions and/or would like to tour our Philip L. Anthony Water Quality Laboratory which is the first public agency lab in California to have received certification to test for PFAS.

Sincerely,



Vicente Sarmiento, Esq.  
President

cc: Senator Ling Ling Chang, District 29  
Senator Bob Archuleta, District 32  
Senator Tom Umberg, District 34  
Senator Patricia Bates, District 36  
Senator John Moorlach, District 37  
Assemblymember Phillip Chen, District 55  
Assemblymember Sharon Quirk-Silva, District 65  
Assemblymember Steven Choi, District 68  
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