

AGENDA
COMMUNICATIONS AND LEGISLATIVE LIAISON COMMITTEE MEETING
WITH BOARD OF DIRECTORS*
ORANGE COUNTY WATER DISTRICT
18700 Ward Street, Fountain Valley, CA (714) 378-3200
May 2, 2024 12:00 p.m.- Conference Room C-2

*The OCWD Communications and Legislative Liaison Committee meeting is noticed as a joint meeting with the Board of Directors for the purpose of strict compliance with the Brown Act and it provides an opportunity for all Directors to hear presentations and participate in discussions. Directors receive no additional compensation or stipend as a result of simultaneously convening this meeting. Items recommended for approval at this meeting will be placed on the **May 15, 2024** Board meeting Agenda for approval.

This meeting will be held in person. As a convenience for the public, the meeting may also be accessed by Zoom Webinar and will be available by either computer or telephone audio as indicated below. Because this is an in-person meeting and the Zoom component is not required, but rather is being offered as a convenience, if there are any technical issues during the meeting, this meeting will continue and will not be suspended.

Computer Audio: You can join the Zoom meeting by clicking on the following link:
<https://ocwd.zoom.us/j/99465334409>

Telephone Audio: (213) 338 8477

Webinar ID: 994 6533 4409

Teleconference Sites: 10382 Bonnie Drive, Garden Grove 19 Cannery, Buena Park 1454 Madison Street, Tustin 400 West Civic Center Drive, Santa Ana 20 Civic Center Plaza, Santa Ana * Members of the public may attend and participate at all locations.
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ROLL CALL

ITEMS RECEIVED TOO LATE TO BE AGENDIZED

RECOMMENDATION: Adopt resolution determining need to take immediate action on item(s) and that the need for action came to the attention of the District subsequent to the posting of the Agenda (requires two-thirds vote of the Board members present, or, if less than two-thirds of the members are present, a unanimous vote of those members present.)

VISITOR PARTICIPATION

Time has been reserved at this point in the agenda for persons wishing to comment for up to three minutes to the Board of Directors on any item that is not listed on the agenda, but within the subject matter jurisdiction of the District. By law, the Board of Directors is prohibited from taking action on such public comments. As appropriate, matters raised in these public comments will be referred to District staff or placed on the agenda of an upcoming Board meeting.

At this time, members of the public may also offer public comment for up to three minutes on any item on the Consent Calendar. While members of the public may not remove an item from the Consent Calendar for separate discussion, a Director may do so at the request of a member of the public.

CONSENT CALENDAR (ITEM NO. 1)

All matters on the Consent Calendar are to be approved by one motion, without separate discussion on these items, unless a Board member or District staff request that specific items be removed from the Consent Calendar for separate consideration.

- 1. MINUTES OF COMMUNICATIONS AND LEGISLATIVE LIAISON COMMITTEE MEETING HELD APRIL 4, 2024

RECOMMENDATION: Approve minutes as presented

MATTERS FOR CONSIDERATION

- 2. STATE LEGISLATIVE UPDATE

RECOMMENDATION: Agendize for May 15 Board meeting: Take action as appropriate

Bill Number/Short Title/Author	Position Recommendation for Consideration:
AB 2515 Papan (D-San Mateo) Menstrual products: perfluoroalkyl and polyfluoroalkyl substances (PFAS)	Take action as appropriate

- 3. FEDERAL LEGISLATIVE UPDATE

RECOMMENDATION: Agendize for May 15 Board meeting: Take the following action:

Bill Number/Author	Short Title	Recommendation
H.R. 7944 (Curtis – R-UT)	Water Systems PFAS Liability Protection Act	Support

INFORMATIONAL ITEMS

- 4. WATER SUMMIT UPDATE
- 5. PUBLIC AFFAIRS OUTREACH REPORT (APRIL)

CHAIR DIRECTION AS TO WHICH ITEMS IF ANY TO BE AGENDIZED AS A MATTER FOR CONSIDERATION AT THE MAY 15 BOARD MEETING

DIRECTOR’S ANNOUNCEMENTS/REPORTS

GENERAL MANAGER’S ANNOUNCEMENT/REPORT

ADJOURNMENT

COMMUNICATION AND LEGISLATIVE LIAISON COMMITTEE MEMBERS

Denis Bilodeau - Chair
Van Tran - Vice Chair
Roger Yoh
Bruce Whitaker
Steve Sheldon

Valerie Amezcua
Natalie Meeks
Dina Nguyen
Erik Weigand
Cathy Green

Agenda Posting: In accordance with the requirements of California Government Code Section 54954.2, this agenda is posted in the window of the guard shack at the main entrance of the Orange County Water District, 18700 Ward Street, Fountain Valley, CA and on the OCWD website: www.ocwd.com not less than 72 hours prior to the meeting date and time above. All written materials relating to each agenda item are available for public inspection in the office of the Assistant District Secretary. Backup material for the Agenda is available at the District offices for public review and can be viewed online at the District's website: www.ocwd.com.

Accommodations to the Disabled: Pursuant to the Americans with Disabilities Act, persons with a disability who require a disability-related modification or accommodation in order to participate in a meeting, including auxiliary aids or services, may request such modification or accommodation from the District Secretary at (714) 378-3234, by email at cfuller@ocwd.com by fax at (714) 378-3373. Notification 24 hours prior to the meeting will enable District staff to make reasonable arrangements to assure accessibility to the meeting.

Availability of Agenda Material: As a general rule, agenda reports or other written documentation that has been prepared or organized with respect to each item of business listed on the agenda can be reviewed at www.ocwd.com. Copies of these materials and other disclosable public records distributed to all or a majority of the members of the Board of Directors in connection with an Open Session agenda item are also on file with and available for inspection at the Office of the District Secretary, 18700 Ward Street, Fountain Valley, California, during regular business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday. If such writings are distributed to members of the Board of Directors on the day of a Board meeting, the writings will be available at the entrance to the Board of Directors meeting room at the Orange County Water District office.

MINUTES OF BOARD OF DIRECTORS MEETING
 WITH COMMUNICATIONS AND LEGISLATIVE LIAISON COMMITTEE
 ORANGE COUNTY WATER DISTRICT
 April 4, 2024, 12:00 p.m.

Director Bilodeau called the Communications and Legislative Liaison Committee meeting to order at 12:00 p.m. in the District Conference Room C-2. Public access was also provided via Zoom webinar. The Secretary called the roll and reported a quorum as follows:

Committee Members

Denis Bilodeau
 Van Tran
 Roger Yoh
 Bruce Whitaker
 Steve Sheldon (arrived 12:17 p.m.)

OCWD Staff

John Kennedy – General Manager
 Chris Olsen – Executive Director
 Crystal Nettles – Principal Communications Specialist
 Alicia Harasty – Legislative Affairs Liaison
 Dani Berch - Communications Specialist
 Leticia Villarreal – Assistant District Secretary

Alternates

Valerie Amezcua
 Natalie Meeks (absent)
 Dina Nguyen (arrived 12:04 p.m.)
 Erik Weigand (arrived 12:02 p.m.)
 Cathy Green (absent)

CONSENT CALENDAR

The Consent Calendar was approved upon motion by Director Tran, seconded by Director Amezcua and carried [4-0] as follows:

Ayes – Bilodeau, Tran, Whitaker, Amezcua

1. Minutes of Previous Meeting

The minutes of the March 7, 2024 Communications/Legislative Liaison Committee meetings are approved as presented.

MATTERS FOR CONSIDERATION

2. State Legislative Update

OCWD Consultants provided recommendation on bill positions and efforts that impact OCWD and efforts to gain PFAS funding.

Upon motion by Director Amezcua, seconded by Director Bilodeau and carried [5-0], the Committee recommended that the Board at its April 17 Board meeting: Take the following positions:

Bill Number/Short Title/Author	Position Recommendation for Consideration:
AB 2079 Bennett (D-Oxnard) Groundwater extraction: large-diameter, high-capacity wells: permits. Bennett (D-Ventura).	Oppose
SB 1147 Portantino (D-Glendale) Drinking water: bottled water: microplastics levels.	Oppose Unless Amended
Bills to remove PFAS from consumer products	
SB 903 Skinner (D-Oakland) Environmental health: product safety: perfluoroalkyl and	Support (Sponsored by CA Association of Sanitation Agencies)

polyfluoroalkyl substances	
AB 2761 Hart (D, Santa Barbara) Product safety: plastic packaging: Reducing Toxics in Packaging Act	Support
AB 2515 Papan (D-San Mateo) Menstrual products: perfluoroalkyl and polyfluoroalkyl substances (PFAS)	Support
SB 1266 Limón (D, Oxnard) Product safety: perfluoroalkyl and polyfluoroalkyl substances	Support

Ayes: Bilodeau, Tran, Yoh, Amezcua, Nguyen

3. Federal Legislative Update

Federal Consultants reported on updates and progress towards exemption for water entities from PFAS liability and funding for PFAS cleanup.

INFORMATIONAL ITEMS

4. Water Summit Update

Director of Public Affairs Gina Ayala reminded the committee the Water Summit is taking place on Friday, September 27 at the Westin South Coast Plaza with Fritz Coleman returning as master of ceremonies. She advised that invitations to speak were sent to Steve Garvey, Adam Schiff, Dave Min, and Scott Baugh. The Planning Committee will continue to meet monthly and update the Com/Leg Committee.

5. Children’s Water Education Festival Recap

Communications Specialist Dani Berch shared the Children’s Water Education Festival was held March 27 and 28. She reported a total of 194 classes attended totaling 5,111 students, 60 activities were hosted by community organizations including 9 booths hosted by OCWD, and 296 volunteers contributed 1,776 hours of time. She stated that thank you notes were sent to all participants (teachers, presenters, and volunteers) and planning will now begin for the 2025 festival.

6. Public Affairs Outreach Report

Ms. Ayala provided an overview of outreach for March 2024.

March Highlights:

- In March there were 6 tours with 157 tour guests and 12 speaker’s bureau engagements
- Legislative briefings were given to Assemblymember Diane Dixon, Assemblymember Tri Ta, and Assemblymember Avelino Valencia.
- The District received an award in March, WaterReuse National Association recognized OCWD and OC San with the 2024 Community Water Champion Award for the completion of the GWRS and our commitment to water reuse.

ADJOURNMENT

There being no further business to come before the Committee, the meeting was adjourned at 12:42 p.m.

Denis Bilodeau, Chair

AGENDA ITEM SUBMITTAL

Meeting Date: May 2, 2024

Budgeted: N/A

To: Communications/Leg. Liaison Cte.
Board of Directors

Budgeted Amount: N/A

Cost Estimate: N/A

From: John Kennedy

Funding Source: N/A

Program/Line-Item No.: N/A

General Counsel Approval: N/A

Staff Contact: G. Ayala/A. Harasty

Engineers/Feasibility Report: N/A

CEQA Compliance: N/A

Subject: STATE LEGISLATIVE UPDATE

SUMMARY

Orange County Water District (OCWD; the District) staff and consultants will provide an update on efforts to gain PFAS funding, as well as provide additional information on AB 2515 (Papan) which was deferred back to Committee at the April 17, 2024, Board of Directors’ meeting.

Attachments:

- Joe A. Gonsalves and Son – Edelstein Gilbert Robson & Smith May 2024 State Legislative Update
- State Bill Matrix
- AB 2515 Papan (D-San Mateo) Menstrual products: perfluoroalkyl and polyfluoroalkyl substances (PFAS) Factsheet
- AB 2515 Committee Analysis from Assembly Judiciary
- AB 2515 Committee Analysis from Assembly Environmental Safety and Toxics Material
- AB 2515 Industry Coalition Opposition Letter

RECOMMENDATION

Agendize for May 15 Board meeting: Take action as appropriate.

Bill Number/Short Title/Author	Position Recommendation for Consideration:
AB 2515 Papan (D-San Mateo) Menstrual products: perfluoroalkyl and polyfluoroalkyl substances (PFAS)	Take action as appropriate

DISCUSSION/ANALYSIS

AB 2515, aimed at regulating menstrual products containing intentionally added PFAS, has been deferred back to the Committee for further review, particularly regarding opposition to the bill. Starting January 1, 2027, the sale of menstrual products with PFAS levels at or above 10 parts per million will be prohibited by the bill. The Department of Toxic

Substances Control (DTSC) is tasked with implementing and enforcing this ban and is authorized to issue necessary regulations.

Additionally, the bill establishes a private right of action (PRA) for enforcement and sets civil penalties at \$5,000 for a first violation and \$10,000 for subsequent violations. A PRA allows individuals to file lawsuits to seek enforcement of regulations or claim damages, serving as a means to hold violators accountable under the law. Notably, there is significant industry opposition to the bill, including from entities such as the California Chamber of Commerce and California Manufacturers & Technology Association, as highlighted in the attached opposition letter from an industry coalition.

The Assembly Environmental Safety and Toxics Material Committee passed AB 2515 on April 9 with a unanimous vote of 5-0. Furthermore, the Assembly Judiciary Committee approved the bill on April 16 with a 10-1 vote. Supporters of the bill include the Orange County Sanitation District and the Los Angeles County Sanitation Districts, as noted in the AB 2515 Committee Analysis attachments.

Background for PFAS-related bills:

Existing law prohibits any person from distributing, selling, or offering for sale in the state any food packaging that contains regulated PFAS, as defined, and requires a manufacturer to use the least toxic alternative when replacing regulated PFAS in food packaging to comply with this requirement. Existing law similarly prohibits, beginning July 1, 2025, a person from manufacturing, distributing, selling, or offering for sale in the state any new, not previously owned, textile articles that contain regulated PFAS.

ACTIVITIES

- April 16 Orange County Supervisor Doug Chaffee met with President Cathy Green, John Kennedy and Alicia Harasty regarding OCWD and its state priorities
- March 26 Assembly Member Dixon met with President Cathy Green, John Kennedy and Alicia Harasty regarding OCWD and its state priorities
- March 8 Assembly Member Valencia met with President Cathy Green, John Kennedy and Alicia Harasty regarding OCWD and its state priorities
- March 15 Assembly Member Tri Ta met with President Cathy Green, John Kennedy and Alicia Harasty regarding OCWD and its state priorities
- January 31 Senator Janet Nguyen's staff, Joe Pena, was briefed by Alicia Harasty
- January 29 Senator Kelly Seyarto's staff, Madison Marks-Noble, was briefed by Alicia Harasty
- January 26 Assembly Member Cottie Petrie-Norris met with President Cathy Green, John Kennedy and Alicia Harasty regarding OCWD and its state priorities
- January 25 OCWD President Green, senior staff and lobbyists had a productive meeting with the Chair of the State Water Resources Control Board

- January 24 Assembly Member Tri Ta's staff, Colin Edwards, Assembly Member Dixon's staff, Kristin Vallandi, Senator Umberg's staff, Fidel Vasquez, was briefed by Alicia Harasty
- January 23 Assembly Member Petrie-Norris's staff, Michael Tou, was briefed by Alicia Harasty
- January 16 The following Sacramento staff to the Orange County delegation were briefed by Alicia Harasty: Jessica Matlock, Office of Senator Newman; Hannah Skaggs, Office of Assembly Member Dixon; Christopher Aguilera, Office of Assembly Member Quirk-Silva; Katherine Moore, Senate Committee on Natural Resources and Water/Senator Min key contact; Victoria Harris, Office of Assembly Member Petrie-Norris; Christian Lopez, Office of Senator Seyarto; Ted Blanchard, Office of Senator Nguyen; Katie Guthrie, Office of Assembly Member Valencia



EDELSTEIN GILBERT ROBSON & SMITH^{LLC}



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TO: ORANGE COUNTY WATER DISTRICT

FROM: JOE A. GONSALVES AND SON
EDELSTEIN GILBERT ROBSON & SMITH^{LLC}

SUBJECT: LEGISLATIVE UPDATE

DATE: April 23, 2024

This week marks the passing of the deadline for bills with costs to the State to pass out of policy committees. As this deadline applies to most legislation introduced each year, April is typically a busy month in the Legislature. Our firms have been tracking a number of bills and issues of interest to OCWD.

SB 903 (Skinner) – PFAS

SB 903 would the distribution or sale of a product containing intentionally added PFAS beginning January 2030 unless the use of PFAS is unavoidable. The bill is sponsored by the California Association of Sanitation Agencies (CASA) and faces significant opposition from chemical companies, businesses, and producers of household products.

SB 903 was heard in the Senate Environmental Quality Committee on April 3 and passed on a 4-2 vote. It will be heard next week in the Senate Appropriations Committee. Given the significant role the Department of Toxic Substances Control (DTSC) has in implementing the bill, we believe SB 903 will be placed on the Committee's suspense file for consideration with other "suspense bills" in mid-May.

AB 2515 (Papan) – Menstrual Products

AB 2515 expands an existing ban on cosmetic products that contain intentionally added PFAS to cover menstrual products containing PFAS. The bill grants DTSC authority to enforce its provisions. AB 2515 faces less opposition than SB 903, but is still opposed by the American Chemistry Council, Chamber of Commerce, Manufacturers, and others.

AB 2515 was heard in both the Assembly Environmental Safety and Toxic Materials Committee and the Assembly Judiciary Committee. It will be heard in the Assembly Appropriations Committee next. Similar to SB 903, we suspect AB 2515 will likely be placed on the suspense file.

AB 2761 (Hart) – Plastic Packaging

AB 2761 would prohibit the manufacturing, selling, or distribution of plastic packaging containing PFAS, PVC, and PVDC beginning January 1, 2026. The bill is sponsored by Californians Against Waste, Clean Water Action, the Natural Resources Defense Council,

and Breast Cancer Prevention Partners. It is opposed by many of the same stakeholders who are opposed to SB 903.

AB 2761 was heard and passed out of the Assembly Environmental Safety and Toxic Materials Committee on April 9 and the Assembly Judiciary Committee on April 16. The bill has its next stop in the Assembly Appropriations Committee.

SB 1266 (Limon) – Children’s Products

As introduced SB 1266 proposed to ban bisphenol and PFAS in children’s products beginning January 1, 2026. SB 1266 was amended on April 8th to remove the specific provisions pertaining to PFAS and now proposes to ban the replacement of bisphenol with any chemical determined by the Department of Toxics and Substances control to be “candidate chemical” pursuant to Section 69502.2 of Title 22 of the California Code of Regulations.

SB 1266 has passed out of both the Senate Environmental Quality Committee and the Senate Health Committee. It is now pending consideration in the Senate Appropriations Committee. Unlike the other bills listed here, SB 1266 had no listed opposition when it was last heard.

PFAS Funding

The State Water Resources Control Board has decided to increase the State Revolving Fund Drinking Water Program Principal Forgiveness amount to \$10 million per water agency for emerging contaminants projects, including those that address PFAS. This is a doubling of the amount of principal forgiveness from \$5 million.

MEASURE	AUTHOR	TOPIC	LOCATION	SUMMARY	POSITION
AB 30	Ward	Atmospheric Rivers: Research, Mitigation, and Climate Forecasting Program.	9/1/2023 – Signed/Chaptered by Governor	Current law establishes the Atmospheric Rivers: Research, Mitigation, and Climate Forecasting Program in the Department of Water Resources. Current law requires the department, upon an appropriation for purposes of the program, to research climate forecasting and the causes and impacts that climate change has on atmospheric rivers, to operate reservoirs in a manner that improves flood protection, and to reoperate flood control and water storage facilities to capture water generated by atmospheric rivers. This bill would rename that program the Atmospheric Rivers Research and Forecast Improvement Program: Enabling Climate Adaptation Through Forecast-Informed Reservoir Operations and Hazard Resiliency (AR/FIRO) Program. The bill would require the department to research, develop, and implement new observations, prediction models, novel forecasting methods, and tailored decision support systems to improve predictions of atmospheric rivers and their impacts on water supply, flooding, post-wildfire debris flows, and environmental conditions.	Support
AB 460	Bauer-Kahan	State Water Resources Control Board: interim relief.	7/14/2023 – Senate 2 Year.	The State Water Resources Control Board and the California regional water quality control boards are required to set forth water quality objectives in state and regional water quality control plans. Current law establishes the Water Rights Fund, which consists of various fees and penalties. The moneys in the Water Rights Fund are available upon appropriation by the Legislature for the administration of the board's water rights program. Current law requires that the owner of any dam allow sufficient water at all times to pass through a fishway, or in the absence of a fishway, allow sufficient water to pass over, around, or through the dam, to keep in good condition any fish that may be planted or exist below the dam, as specified. This bill would authorize the board to issue, on its own motion or upon the petition of an interested party, an interim relief order in appropriate circumstances to implement or enforce these and related provisions of law. The bill would provide that a person or entity that violates any interim relief order issued by the board would be liable to the board for a civil penalty in an amount not to exceed the sum of \$10,000 for each day in which a violation occurs and \$5,000 for each acre-foot of water diverted in violation of the interim relief order. The bill would require these funds to be deposited in the Water Rights Fund	Oppose
AB 557	Hart	Open Meetings: Local Agencies:	10/9/2023 – Signed/Chaptered by	Current law, until January 1, 2024, authorizes a local agency to use teleconferencing without complying with specified teleconferencing requirements in specified circumstances	Support

		Teleconferences.	Governor	when a declared state of emergency is in effect, or in other situations related to public health, as specified. If there is a continuing state of emergency, or if state or local officials have imposed or recommended measures to promote social distancing, existing law requires a legislative body to make specified findings not later than 30 days after the first teleconferenced meeting, and to make those findings every 30 days thereafter, in order to continue to meet under these abbreviated teleconferencing procedures. Current law requires a legislative body that holds a teleconferenced meeting under these abbreviated teleconferencing procedures to give notice of the meeting and post agendas, as described, to allow members of the public to access the meeting and address the legislative body, to give notice of the means by which members of the public may access the meeting and offer public comment, including an opportunity for all persons to attend via a call-in option or an internet-based service option. Current law prohibits a legislative body that holds a teleconferenced meeting under these abbreviated teleconferencing procedures from requiring public comments to be submitted in advance of the meeting and would specify that the legislative body must provide an opportunity for the public to address the legislative body and offer comment in real time. This bill would extend the above-described abbreviated teleconferencing provisions when a declared state of emergency is in effect, or in other situations related to public health, as specified, indefinitely.	
AB 817	Pacheco	Open meetings: teleconferencing: subsidiary body.	1/25/2024 – In Senate. Read first time. To Com. on RLS. for committee assignment.	Current law, until January 1, 2026, authorizes the legislative body of a local agency to use alternative teleconferencing in certain circumstances related to the particular member if at least a quorum of its members participate from a singular physical location that is open to the public and situated within the agency’s jurisdiction and other requirements are met, including restrictions on remote participation by a member of the legislative body. This bill would authorize a subsidiary body, as defined, to use alternative teleconferencing provisions similar to the emergency provisions indefinitely and without regard to a state of emergency. In order to use teleconferencing pursuant to the Ralph M. Brown Act, the bill would require the legislative body that established the subsidiary body by charter, ordinance, resolution, or other formal action to make specified findings by majority vote, before the subsidiary body uses teleconferencing for the first time and every 12 months thereafter.	Support
AB 1337	Wicks	State Water	7/14/2023 – Senate	Would authorize the State Water Resources Control Board to adopt regulations for various water conservation purposes,	Oppose

		Resources Control Board: water shortage enforcement.	2 Year.	including, but not limited to, to prevent the waste, unreasonable use, unreasonable method of use, or unreasonable method of diversion of water, and to implement these regulations through orders curtailing the diversion or use of water under any claim of right. The bill would require the board to provide notice and an opportunity to be heard before issuing an order, except where an opportunity to be heard before the issuance of an order would be impractical given the likelihood of harm to the purposes of the various water conservation regulations. The bill would provide that a person or entity may be civilly liable for a violation of any regulation or order issued by the board pursuant to these provisions in an amount not to exceed \$1,000 for each day in which the violation has occurred and \$2,500 for each acre-foot of water diverted or used in violation of the applicable requirement. The bill would authorize the imposition of this civil liability by the superior court, as specified, or administratively by the board. The bill would provide that a regulation or order issued by the board pursuant to these provisions, or by emergency regulation, is exempt from the California Environmental Quality Act (CEQA).	
AB 1567	Garcia	Safe Drinking Water, Wildfire Prevention, Drought Preparation, Flood Protection, Extreme Heat Mitigation, and Workforce Development Bond Act of 2023.	6/14/2023-Assembly Natural Resources Committee. Hearing Cancelled by Author.	The California Drought, Water, Parks, Climate, Coastal Protection, and Outdoor Access For All Act of 2018, approved by the voters as Proposition 68 at the June 5, 2018, statewide primary election, authorizes the issuance of bonds in the amount of \$4,100,000,000 pursuant to the State General Obligation Bond Law to finance a drought, water, parks, climate, coastal protection, and outdoor access for all program. Article XVI of the California Constitution requires measures authorizing general obligation bonds to specify the single object or work to be funded by the bonds and further requires a bond act to be approved by a 2/3 vote of each house of the Legislature and a majority of the voters. This bill would enact the Safe Drinking Water, Wildfire Prevention, Drought Preparation, Flood Protection, Extreme Heat Mitigation, and Workforce Development Bond Act of 2023, which, if approved by the voters, would authorize the issuance of bonds in the amount of \$15,105,000,000 pursuant to the State General Obligation Bond Law to finance projects for safe drinking water, wildfire prevention, drought preparation, flood protection, extreme heat mitigation, and workforce development programs. This bill contains other related provisions.	Watch & work with associations to include funding for 1. PFAS Cleanup. 2. Projects to protect groundwater from sea water intrusion.
AB 2079	Bennett	Groundwater extraction:	3/21/2024 - Amended. Assembly	The bill would require a groundwater sustainability agency with oversight for the area of the basin where the local enforcement agency has well permitting jurisdiction to	Oppose

		large-diameter, high-capacity wells: permits.	Water, Parks & Wildlife Committee. Committee Hearing on 4/23/2024.	provide specified information to the local enforcement agency, including, but not limited to, the name of the applicable groundwater sustainability agency, the agency manager and contact information, and the applicable sustainable management criteria related to groundwater levels, including the groundwater level measurable objectives and minimum thresholds.	
AB 2515	Papan	Menstrual products: perfluoroalkyl and polyfluoroalkyl substances (PFAS).	4/16/2024 – Referred to Assembly Appropriations Committee.	Current law, beginning January 1, 2025, prohibits a person or entity from manufacturing, selling, delivering, holding, or offering for sale in commerce any cosmetic product that contains intentionally added perfluoroalkyl and polyfluoroalkyl substances (PFAS), as defined. This bill would similarly prohibit any person from manufacturing, distributing, selling, or offering for sale in the state any menstrual products that contain regulated PFAS,	Returned to Comm/Leg
AB 2626	Dixon	Advanced Clean Fleets regulations: local governments.	3/4/2024 – Referred to Assembly Transportation and Natural Resources Committees.	This bill would extend the compliance dates for local government set forth in the Advanced Clean Fleets Regulation by 10 years. The bill would prohibit the state board from taking enforcement action against a local government for violating the Advanced Clean Fleets Regulation if the alleged violation occurs before January 1, 2025	Support
AB 2761	Hart	Product safety: plastic packaging: Reducing Toxics in Packaging Act.	4/16/2024 – Referred to Assembly Appropriations Committee.	This bill would enact the Reducing Toxics in Packaging Act, which would prohibit, beginning January 1, 2026, a person from manufacturing, selling, offering for sale, or distributing in the state plastic packaging that contains certain chemicals, as specified.	Support
SB 23	Caballero	Water supply and flood risk reduction projects: expedited permitting.	1/18/2024 – Senate – Dead.	Current law prohibits an entity from substantially diverting or obstructing the natural flow of, or substantially changing or using any material from the bed, channel, or bank of, any river, stream, or lake, or deposit or dispose of debris, waste, or other material containing crumbled, flaked, or ground pavement where it may pass into any river, stream, or lake, except under specified conditions, including requiring the entity to send written notification to the Department of Fish and Wildlife regarding the activity in the manner prescribed by the department. This bill would require a project proponent, if already required to submit a notification to the department, to complete and submit environmental documentation to the department for the activity in the notification.	Support
SB 366	Caballero	The California Water Plan: long-term supply targets.	7/14/2023 – Assembly 2-year.	Current law requires the Department of Water Resources to update every 5 years the plan for the orderly and coordinated control, protection, conservation, development, and use of the water resources of the state, which is known as the California Water Plan. Current law requires the department to include a discussion of various strategies in the plan update, including, but not limited to, strategies relating to the development of	Support

				<p>new water storage facilities, water conservation, water recycling, desalination, conjunctive use, water transfers, and alternative pricing policies that may be pursued in order to meet the future needs of the state. Current law requires the department to establish an advisory committee to assist the department in updating the plan. This bill would require the department to instead establish a stakeholder advisory committee, to expand the membership of the committee to include tribes and environmental justice interests, to prohibit a member of the committee from serving longer than the development of 2 updates, and to require the committee to meet a minimum of 4 times annually. The bill would require the department, in coordination with the California Water Commission, the State Water Resources Control Board, other state and federal agencies as appropriate, and the stakeholder advisory committee to develop a comprehensive plan for addressing the state's water needs and meeting specified water supply targets established by the bill for purposes of "The California Water Plan."</p>	
SB 389	Allen	<p>State Water Resources Control Board: determination of water right.</p>	<p>10/8/2023 – Signed/Chaptered by Governor</p>	<p>Current law provides that it is the intent of the Legislature that the state take vigorous action to enforce the terms and conditions of permits, licenses, certifications, and registrations to appropriate water, to enforce state board orders and decisions, and to prevent the unlawful diversion of water. This bill would authorize the State Water Resources Control Board to investigate the diversion and use of water from a stream system to determine whether the diversion and use are based upon appropriation, riparian right, or other basis of right, as specified.</p>	<p>Neutral</p>

<p>SB 411</p>	<p>Portantino</p>	<p>Open meetings: teleconferences: bodies with appointed membership.</p>	<p>10/9/2023 – Signed/Chaptered by Governor</p>	<p>Current law, until January 1, 2024, authorizes the legislative body of a local agency to use alternate teleconferencing provisions during a proclaimed state of emergency or in other situations related to public health that exempt a legislative body from the general requirements (emergency provisions) and impose different requirements for notice, agenda, and public participation, as prescribed. The emergency provisions specify that they do not require a legislative body to provide a physical location from which the public may attend or comment. Current law, until January 1, 2026, authorizes the legislative body of a local agency to use alternative teleconferencing in certain circumstances related to the particular member if at least a quorum of its members participate from a singular physical location that is open to the public and situated within the agency’s jurisdiction and other requirements are met, including restrictions on remote participation by a member of the legislative body. This bill would authorize a legislative body to use alternate teleconferencing provisions similar to the emergency provisions indefinitely and without regard to a state of emergency. The bill would alternatively define “legislative body” for this purpose to mean a board, commission, or advisory body of a local agency, the membership of which board, commission, or advisory body is appointed and which board, commission, or advisory body is otherwise subject to the Ralph M. Brown Act.</p>	<p>Watch</p>
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<p>SB 638</p>	<p>Eggman</p>	<p>Climate Resiliency and Flood Protection Bond Act of 2024.</p>	<p>7/11/2023- Assembly Water, Parks & Wildlife Committee. Hearing postponed by committee.</p>	<p>Would enact the Climate Resiliency and Flood Protection Bond Act of 2024 which, if approved by the voters, would authorize the issuance of bonds in the amount of \$6,000,000,000 pursuant to the State General Obligation Bond Law, for flood protection and climate resiliency projects.</p>	<p>Watch and work with associations to include funding for 1. PFAS Cleanup. 2. Projects to protect groundwater from sea water intrusion.</p>
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SB 745	Cortese	The Drought-Resistant Buildings Act.	10/13/2023 – Signed/Chaptered by Governor	Would require the California Building Standards Commission to develop and propose mandatory building standards to reduce the designed potable water demand of new buildings by 25% from current mandatory design requirements and to minimize the use of potable water for nonpotable uses. The bill would require the commission to adopt mandatory building standards that require new buildings to be designed to capture graywater and use alternative water sources for nonpotable building and landscaping water uses, as specified.	Oppose unless amended to exempt areas from the dual plumbing requirement that already recycle indoor water use.
SB 867	Allen	Drought and Water Resilience, Wildfire and Forest Resilience, Coastal Resilience, Extreme Heat Mitigation, Biodiversity and Nature-Based Climate Solutions, Climate Smart Agriculture, and Park Creation and Outdoor Access Bond Act of 2023.	7/6/2023-Assembly Natural Resources Committee. Hearing postponed by committee.	Would enact the Drought and Water Resilience, Wildfire and Forest Resilience, Coastal Resilience, Extreme Heat Mitigation, Biodiversity and Nature-Based Climate Solutions, Climate Smart Agriculture, and Park Creation and Outdoor Access Bond Act of 2023, which, if approved by the voters, would authorize the issuance of bonds in an unspecified amount pursuant to the State General Obligation Bond Law to finance projects for drought and water resilience, wildfire and forest resilience, coastal resilience, extreme heat mitigation, biodiversity and nature-based climate solutions, climate smart agriculture, and park creation and outdoor access programs.	Watch and work with associations to include funding for 1. PFAS Cleanup. 2. Projects to protect groundwater from sea water intrusion.

SB 903	Skinner	Environmental health: product safety: perfluoroalkyl and polyfluoroalkyl substances.	4/15/2024 – Senate Appropriations Committee. Committee Hearing on 4/29/2024.	Would, beginning January 1, 2032, prohibit a person from distributing, selling, or offering for sale a product that contains intentionally added perfluoroalkyl and polyfluoroalkyl substances (PFAS), as defined, unless the Department of Toxic Substances Control has made a determination that the use of PFAS in the product is a currently unavoidable use, the prohibition is preempted by federal law, or the product is previously used.	Support (Sponsored by CA Association of Sanitation Agencies)
SB 1147	Portantino	Drinking water: bottled water: microplastics levels.	4/22/2024 – Senate Health Committee. Committee Hearing on 4/24/2024.	This bill would require, among other things, the Office of Environmental Health Hazard Assessment (OEHHA) to study the health impacts of microplastics in drinking water, including bottled water, in order to evaluate and identify safe and unsafe levels of microplastics in those types of water, and, on or before January 1, 2026, to develop and deliver to the state board, among other things, public health standards and goals for a safe level of microplastics in those waters.	Oppose Unless Amended

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Assembly Bill 2515: The T.A.M.P.O.N. Act (Take All Menstrual Product PFAS Out Now)

SUMMARY

Assembly Bill (AB) 2515 will limit the unnecessary adverse health impacts PFAS has on women, girls, and people who use menstrual products. The bill will establish a practical maximum contamination threshold of PFAS at 10ppm for all menstrual products by 2027.

BACKGROUND

PFAS a.k.a “forever chemicals” are incredibly long-lasting because they are resistant to water, oil and heat. Due to their durability, PFAS chemicals have been added to thousands of everyday products for decades.

However, these seemingly helpful compounds, have been linked by [scientific, peer-reviewed research](#) to severe health problems, including breast and other cancers, hormone disruption, kidney and liver damage, thyroid disease, developmental harm, and immune system disruption.

In light of these findings, California has moved to eliminate PFAS class chemicals from clothes, children’s toys, cookware, food packaging, and most recently cosmetics. With all of this progress towards limiting our everyday PFAS exposure through source control, our most intimate period products remain - unregulated.

PROBLEM

PFAS cannot be metabolized and instead accumulates in our bodies. Exposure to PFAS and the accrual of these chemicals in the body pose long-term health risks.

Research has linked high rates of contaminant exposure in the vaginal area to a variety of health conditions including: accelerated ovarian aging, period irregularities and ovarian disorders like polycystic ovarian syndrome.

In the United States, approximately 72.7 million women are of reproductive age (15-49). For those who use menstrual products, exposure to PFAS is almost unavoidable. In a recent study, 48% of sanitary pads, incontinence pads, and panty liners tested were found to contain PFAS, as were 22% of tampons.

Additionally, menstrual products have shown higher levels of PFAS contamination than that found in tap water.

SOLUTION

PFAS is everywhere in our environment. Consequently, there are many steps we must take to limit our exposure and health risks associated with it.

AB 2515 takes a critical step in protecting our health and reducing the amount of PFAS in our environment by reducing the level of these chemicals in menstrual products.

SUPPORT

A Voice for Choice Advocacy
American College of Obstetricians and Gynecologists
District IX
Breast Cancer Prevention Partners
California Professional Firefighters
California Women's Law Center
CleanEarth4Kids.org
Clean Water Action
Educate. Advocate.
Los Angeles County Sanitation Districts
Orange County Sanitation District
Planned Parenthood Affiliates of California
Reproductive Freedom for All

OPPOSE

American Chemistry Council
American Forest and Paper Association
California Chamber of Commerce

California Manufacturers and Technology Association
Center for Baby and Adult Hygiene Products
Civil Justice Association of California

CONTACT

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Date of Hearing: April 16, 2024

ASSEMBLY COMMITTEE ON JUDICIARY
Ash Kalra, Chair
AB 2515 (Papan) – As Amended April 4, 2024

SUBJECT: MENSTRUAL PRODUCTS: PERFLUOROALKYL AND POLYFLUOROALKYL SUBSTANCES (PFAS)

KEY ISSUES:

- 1) SHOULD THE PRESENCE OF PERFLUOROALKYL AND POLYFLUOROALKYL SUBSTANCES IN MENSTRUAL PRODUCTS BE LIMITED TO 10 PARTS PER MILLION?
- 2) SHOULD THE PROHIBITION ON PERFLUOROALKYL AND POLYFLUOROALKYL SUBSTANCES IN MENSTRUAL PRODUCTS BE ENFORCED BY GOVERNMENT PROSECUTORS AND INDIVIDUALS WHO SUFFERED DIRECT HARM FROM PERFLUOROALKYL AND POLYFLUOROALKYL SUBSTANCES?

SYNOPSIS

Perfluoroalkyl and polyfluoroalkyl substances, also known as PFAS, are volatile, highly fluorinated chemical compounds that have been used in a myriad of consumer and commercial products. Evidence suggests that exposure to PFAS can increase the rate of birth defects, developmental disorders, and certain types of cancers. Due to the products extensive use, background traces of PFAS are prevalent in the lived environment. As a result of background PFAS contamination, even if a product has moved away from intentionally using PFAS, the product can still be contaminated by the chemicals.

This bill seeks to limit the use of PFAS in menstrual products. The bill establishes a 10 parts per million maximum standard for the presence of PFAS in these products. The bill would direct the Department of Toxic Substances Control to adopt guidance on the implementation of this measure. The bill also proposes two means of enforcement. First, a person who is actually harmed by the presence of PFAS in menstrual products may bring a civil action to recover their damages stemming from the PFAS exposure, and in rare cases, may seek exemplary damages. This bill also vests public prosecutors with the ability to seek civil penalties against manufacturers whose products are found to violate the 10 parts per million standard.

This bill is supported by a coalition of medical professional, reproductive rights advocates, and water districts. The proponents note the dangers of PFAS exposure, particularly in products as sensitive as menstrual products, and the need to eliminate PFAS from the lived environment. This bill is opposed by a coalition of product manufacturers and other business organizations. The groups lament the private right of action and seek a better definition of violation for the government enforcement provisions of this measure. The Committee concedes the need for greater clarity surrounding what constitutes a violation related to civil penalties; however, the stakeholders continue to debate the proper scope of the definition, and the Department of Toxic Substances Control is almost certainly going to weigh in on the matter, as well. Given this dynamic, the Committee may wish to advance the measure to permit stakeholder discussions to

continue on this topic. The measure was previously heard and approved by the Committee on Environmental Safety and Toxic Materials by a 5-0 vote.

SUMMARY: Prohibits the presence of perfluoroalkyl and polyfluoroalkyl (PFAS) substances in menstrual products at concentrations in excess of 10 parts per million. Specifically, **this bill:**

- 1) Prohibits the manufacture, distribution, sales, or offer for sales in the state a menstrual product that contains regulated PFAS.
- 2) Requires the Department of Toxic Substances Control to issue guidance as it relates to testing for the presence of regulated PFAS in menstrual products.
- 3) Permits the Department of Toxic Substances Control to adopt regulations to implement this bill.
- 4) Exempts the Department of Toxic Substances Control's actions pursuant to 2) and 3) from the Administrative Procedures Act.
- 5) Authorizes the Department of Toxic Substances Control to issue a cease and desist order to the manufacturer of a menstrual product if the Department finds that a menstrual product contains regulated PFAS, and reasonably suspects that imminent harm would result from the continued sale of the product.
- 6) Authorizes a person to bring a civil action in a court of competent jurisdiction for any injury suffered as a result of a product sold in violation.
- 7) Authorizes a person prevailing in a civil action pursuant to 6) to receive exemplary damages.
- 8) Authorizes the Attorney General in the name of the people of the state by the request of the Department of Toxic Substances Control, a city attorney, a county counsel, or a city prosecutor in a city or city and county having a full-time city prosecutor to bring a civil action seeking penalties for a violation of this bill.
- 9) Provides that those seeking a civil penalty pursuant to 8) may seek a penalty not to exceed five thousand dollars (\$5,000) per day for a first violation and ten thousand dollars (\$10,000) per day for subsequent violations.
- 10) Provides that, in addition to the penalties provided by 9), the public prosecutors authorized to enforce this bill pursuant to 8) may seek injunctive relief.
- 11) Entitles a prevailing plaintiff bringing an action pursuant to 8) to be awarded attorney's fees and costs by the court.
- 12) Provides that any penalty money recovered in an action brought pursuant to 8) is to be deposited in the T.A.M.P.O.N. Act Fund, which is to be created in the State Treasury.
- 13) Defines "menstrual product" as a product used to collect menstruation and vaginal discharge, including, but not limited to, tampons, pads, sponges, menstruation underwear, disks, and menstrual cups, whether disposable or reusable;

- 14) Defines “perfluoroalkyl and polyfluoroalkyl substances” or “PFAS” as a class of fluorinated organic chemicals containing at least one fully fluorinated carbon atom;
- 15) Defines “Regulated perfluoroalkyl and polyfluoroalkyl substances or PFAS” as either:
 - a) Commencing January 1, 2025, PFAS that a manufacturer has intentionally added to a product and that have a functional or technical effect in the product, including the PFAS components of intentionally added chemicals and PFAS that are intentional breakdown products of an added chemical that also have a functional or technical effect in the product; or
 - b) Commencing January 1, 2027, the presence of PFAS in a product or product component at or above 10 parts per million, as measured in total organic fluorine.

EXISTING LAW:

- 1) Requires, commencing January 1, 2022, a person that sells firefighter personal protective equipment to provide a written notice to the purchaser if the firefighter personal protective equipment contains intentionally added PFAS chemicals. (Health and Safety Code Section 13029 (b)(1).)
- 2) Prohibits, commencing January 1, 2022, a manufacturer of class B firefighting foam from manufacturing, or knowingly selling, offering for sale, distributing for sale, or distributing for use, and a person from using, class B firefighting foam containing intentionally added PFAS chemicals. (Health and Safety Code Section 13061 (b)(1).)
- 3) Prohibits, on and after July 1, 2023, a person, including, but not limited to, a manufacturer, from selling or distributing in commerce in this state any new, not previously owned, juvenile product, as defined, that contains intentionally added PFAS or PFAS at or above 100 PPM, as measured in total organic fluorine. (Health and Safety Code Section 108946.)
- 4) Prohibits, on or after January 1, 2025, a person from manufacturing, distributing, selling, or offering for sale in the state any new, not previously used, textile articles that contain intentionally added PFAS, or PFAS at or above 100 PPM, and on or after January 1, 2027, 50 PPM, as measured in total organic fluorine. (Health and Safety Code Section 108971.)
- 5) Prohibits, commencing January 1, 2025, a person or entity from manufacturing, selling, delivering, holding, or offering for sale, in commerce any cosmetic product that contains any specified intentionally added ingredients, including some PFAS chemicals. (Health and Safety Code Section 108980 (a).)
- 6) Prohibits, commencing January 1, 2025, a person or entity from manufacturing, selling, delivering, holding, or offering for sale in commerce any cosmetic product that contains intentionally added PFAS. (Health and Safety Code Section 108981.5.)
- 7) Prohibits, commencing January 1, 2023, a person from distributing, selling, or offering for sale in the state any food packaging that contains intentionally added PFAS or PFAS at or above 100 PPM, as measured in total organic fluorine. (Health and Safety Code Section 109000.)

- 8) Authorizes the State Water Resources Control Board (State Water Board) to order a public water system to monitor for PFAS; requires community water systems to report detections; and, where a detected level of these substances exceeds the response level, to take a water source out of use or provide a prescribed public notification. (Health and Safety Code Section 116378.)
- 9) Requires a package or box containing menstrual products that was manufactured on or after January 1, 2023, for sale or distribution in this state to have printed on the label a plain and conspicuous list of all intentionally added ingredients in the product. (Health and Safety Code Section 111822.2.)
- 10) Provides that in an action for the breach of an obligation not arising from contract, where it is proven by clear and convincing evidence that the defendant has been guilty of oppression, fraud, or malice, the plaintiff, in addition to the actual damages, a plaintiff may recover damages for the sake of example and by way of punishing the defendant. (Civil Code Section 3294 (a).)
- 11) Defines the following for the purpose of 10):
 - a) “Malice” means conduct which is intended by the defendant to cause injury to the plaintiff or despicable conduct which is carried on by the defendant with a willful and conscious disregard of the rights or safety of others;
 - b) “Oppression” means despicable conduct that subjects a person to cruel and unjust hardship in conscious disregard of that person’s rights; and
 - c) “Fraud” means an intentional misrepresentation, deceit, or concealment of a material fact known to the defendant with the intention on the part of the defendant of thereby depriving a person of property or legal rights or otherwise causing injury. (Civil Code Section 3294 (c).)
- 12) Prohibits any state agency from issuing, utilizing, enforcing, or attempting to enforce any guideline, criterion, bulletin, manual, instruction, order, standard of general application, or other rule, which is a regulation, unless the guideline, criterion, bulletin, manual, instruction, order, standard of general application, or other rule has been adopted as a regulation and filed with the Secretary of State pursuant to the Administrative Procedure Act. (Government Code Section 11340.5 (a).)
- 13) Defines “regulation” for the purpose of the Administrative Procedure Act as every rule, regulation, order, or standard of general application or the amendment, supplement, or revision of any rule, regulation, order, or standard adopted by any state agency to implement, interpret, or make specific the law enforced or administered by it, or to govern its procedure. (Government Code Section 11342.600.)
- 14) Defines a “product liability action” as any action for injury or death caused by a product, except that the term does not include an action based on a manufacturing defect or breach of an express warranty. (Civil Code Section 1714.45 (c).)

FISCAL EFFECT: As currently in print this bill is keyed fiscal.

COMMENTS: Recognizing the risks posed by PFAS, particularly PFAS in products used in sensitive areas of the body, this bill seeks to prohibit PFAS substances in menstrual products at concentrations in excess of 10 parts per million (PPM). The bill also adopts a civil penalty regime to enable public prosecutors to enforce parts of this measure, as well as a private right of action for those harmed by PFAS in menstrual products. In support of this measure, the author states:

These once ubiquitous, forever compounds have been linked to health problems, including breast and other cancers, hormone disruption, kidney and liver damage, thyroid disease, developmental harm, and immune system disruption. The presence of PFAs in menstrual products contributes to existing gender health inequities as exposure to PFAS is almost unavoidable. In a recent study, 48% of sanitary pads, incontinence pads, and panty liners tested were found to contain PFAS, as were 22% of tampons. Additionally, menstrual products have shown higher levels of PFAS than are found in tap water.

AB 2515 takes a critical step towards protecting women's health and reducing the amount of PFAS in the environment by eliminating polyfluoroalkyl substances (PFAS) from menstrual products. California's pursuit for gender equity and clean drinking waters requires action to ensure that feminine hygiene products are safe, clean and free from forever chemicals. With viable alternatives available, there is no longer a good rationale for their use in menstrual products. Women's health must be prioritized over the use of these unnecessary chemicals. It's past time to protect women and our environment.

The dangers of PFAS exposure. PFAS chemicals are frequently used in consumer products to boost the products ability to resist heat, water, and lipids. As a result PFAS is found in a litany of consumer products from carpets and furniture to non-stick cookware to consumer apparel and personal care products. At its root PFAS chemicals are highly fluorinated, volatile chemical substances. Not only are PFAS used in the above discussed consumer products, the chemicals are also used in oil and gas exploration, firefighting foam, and electronics to name just a few of PFAS's industrial uses. As a result of the numerous uses of PFAS chemicals and the general volatility of the chemical compounds composing PFAS, the chemical is now widely dispersed throughout the lived environment. Even more troubling the chemicals take significant time to degrade, even when exposed to the elements.

As a result of the widespread proliferation of PFAS into the environment, humans can be exposed to these chemicals in numerous ways. First, and most obvious, would be exposure through the workplace or by using a consumer product containing PFAS. Secondly, PFAS exposure can occur as a result of eating food or consuming water that contains trace amounts of the chemical from soil or waterways. Because these chemicals can build up in the food chain, meats and fish products can contain especially high levels of these chemicals.

Due to PFAS ability to bio accumulate in the food chain and persist for years, exposure to the chemicals can have serious health impacts. In studies conducted by the United States Environmental Protection Agency, PFAS exposure has been demonstrated to result in birth defects, developmental delays, immune system suppression, cancer (notably kidney, prostate, and testicular cancer), interference with hormones, and increased risk of obesity and high cholesterol. (<https://www.epa.gov/pfas/our-current-understanding-human-health-and-environmental-risks-pfas>.)

Due to the intimate nature of menstrual products, and their use in close proximity to the body, exposure to PFAS can be particularly harmful. More troublingly, recent studies have indicated that large percentages of menstrual products contain traces of PFAS. A 2022 study by Mamavation and Environmental Health News discovered that 48 percent of pads, 22 percent of tampons, and 65 percent of period underwear tested positive for the presence of PFAS. (Jeffery Kluger, *PFAS 'Forever Chemicals' Are Turning Up in Menstrual Products. Here's What You Need to Know*, TIME Magazine (Feb. 9, 2023).) Unsurprisingly, studies are also now linking maternal PFAS exposure with fetal neurological developmental delays. (Webster et. al, *Associations between Perfluoroalkylacids (PFASs) and maternal thyroid hormones in early pregnancy: A population-based cohort study* (2014) 133 Environmental Research 338.)

In response to these risks, the United States Environmental Protection Agency announced a “PFAS Strategic Roadmap” to adopt an agency wide approach to addressing PFAS contamination and is now undertaking rulemaking to generate additional oversight of PFAS production, exposure, and hazards nationwide. Additionally, since 2022, the Department of Toxic Substances Control has been seeking to better regulate PFAS in consumer products including upholstery, clothing, shoes, and carpeting. Similarly, the State Water Resources Control Board issued General Order DW 2024-0002-DDW in March of 2024 directing local water agencies to begin monitoring for PFAS in water systems serving at risk disadvantaged communities.

This bill seeks to limit the presence of PFAS in menstrual products by prohibiting the intentional addition of PFAS to menstrual products, and imposing a 10 PPM cap on allowable traces of organic fluorine (a marker for PFAS) in these products to commence in 2027. The measure also directs the Department of Toxic Substances Control to develop guidance related to PFAS and permits the Department to enact any regulations necessary to implement this measure. Those regulations and guidance documents would be exempted from the Administrative Procedures Act.

Of primary relevance to this Committee, this bill adopts two methods to enforce the PFAS prohibition. First, this bill authorizes government enforcement of the measure. The bill authorizes the Attorney General, as well as city attorneys and county counsel, to seek civil penalties, ranging from five to ten thousand dollars per violation, for violations of this bill’s provisions. The bill also authorizes public prosecutors to seek injunctive relief. Secondly, this bill authorizes an individual harmed by PFAS present in menstrual products to file a private right of action to compensate them for the damages caused by the presence of toxic chemicals in menstrual products. The measure authorizes potential punitive damages, should they be warranted, in a private right of action.

The private right of action in this measure is limited to those actually harmed by PFAS exposure. Opposition to this measure, a coalition of consumer product producers, contend that this bill punishes producers who do not intentionally add PFAS to products and exposes these producers to potential punitive damages. As it relates to the governmental enforcement, as state regulators, permitting a regulatory agency to seek penalties for the presence of toxic chemicals is a fairly standard practice. While the opponents to this measure are correct that some PFAS contamination comes from background sources, state regulators are well within their right to try and force manufacturers to use improved manufacturing practices in order to reduce the presence of toxics in their products.

As it pertains to the private right of action, the remedies appear both appropriate and commensurate with existing law. First, existing California law authorizes product defect lawsuits for harm caused by defective consumer products. By creating a standalone action, limited to those who actually suffer harm as a result of PFAS exposure from menstrual products, this bill essentially establishes the 10 PPM standard as the duty of care owed to consumers by menstrual product manufacturers. As it relates to the punitive damages, existing law requires a showing of “oppression, fraud, or malice” by clear and convincing evidence. To the extent that product manufacturers do not add PFAS to menstrual products, as claimed by the opposition, it would be nearly impossible for a plaintiff to meet this standard if a menstrual product simply exceeded the 10 PPM standard through background PFAS exposure. Only if a menstrual product manufacturer *intentionally added* PFAS in contradiction of the prohibition in this bill would the “oppression, fraud, or malice” standard be met. Thus, while it is understandable that the opponents of this measure would prefer to eliminate all risk of punitive damages being imposed on manufacturers of menstrual products, given that the punitive damages would only be imposed on manufacturers who *are adding* PFAS to menstrual products and the manufacturers contend they are *not adding* PFAS to menstrual products, the damages provisions of this measure should not pose a significant legal threat to the menstrual products industry.

Ongoing discussions seek to determine what constitutes a violation of this bill. Recent amendments to this measure, taken in the Committee on Environmental Safety and Toxic Materials but developed with significant input from this Committee, significantly restructured the enforcement provisions of this measure. As noted, this bill contains both private and governmental enforcement. While the private right of action is focused on actual harm, the governmental enforcement language focuses on a “violation” of the standards in the bill. However, what defines a violation is still unclear. Due to the unique nature of how menstrual products are sold, a single use product sold within a larger package of the products, determining a violation can be difficult. For example, an individual tampon may have the presence of PFAS in excess of the 10 PPM standard but the remainder of the box it was sold with do not. In that case would the individual tampon be one violation or would the entire box consist of the violation? In a similar instance, if three tampons within a box of 100 tested in excess of the 10 PPM standard, that could be either three violations or one violation, depending on how the term were defined.

Discussions with stakeholders make it clear that differences remain as to how to properly define the term “violation.” While the author and opposition have been in discussions surrounding this language, the Department of Toxic Substances Control is also likely to have thoughts as to how their enforcement staff would prefer the language. Given that there are merits to each of the various approaches for defining a violation, and that all parties are committed to developing a definition, this Committee may not see a need to force one definition into the bill at this time, especially given that ongoing discussions would almost certainly amend that definition.

Given that the enforcement language now provides for clearly delineated causes of action and provides clear authority regarding who is authorized to file suit, the Committee may not see a need to amend the measure at this time.

As the bill progresses, Committee staff will continue to engage with stakeholders. The Committee reserves the ability to recall the measure should an agreement on a workable definition not be reached.

ARGUMENTS IN SUPPORT: This bill is supported by a coalition of reproductive rights advocates, water and sanitation districts, medical professionals, and first responders. In support of this bill the American College of Obstetricians and Gynecologists writes:

Exposure to toxic chemicals can have many harmful effects on health. These chemicals disrupt the body's endocrine system, which makes hormones and sends them throughout your body. This means chemicals can affect many parts of your body, including your thyroid gland, brain, reproductive organs, and immune system. Chemicals can disrupt cells and contribute to cancer.

Since the 1990s, we've called substances that have these harmful effects on the body "endocrine disruptors." There are many different types of endocrine disruptors, including lead and chemicals called parabens, phthalates, and PFAS, which are addressed in this bill. PFAS are widely used substances that break down very slowly, earning them the name "forever chemicals." This makes them especially harmful to our health.

Given the harmful effects of PFAS, California has been focused on removing or limiting PFAS from our products. AB 2515 makes another logical step to remove and limit PFAS from menstrual products.

Additionally the California Water Association writes:

US EPA has determined that exposure to PFAS/PFOS can lead to adverse human health effects. CWA's members are actively working to remove PFAS in the drinking water of communities throughout California. This bill will eliminate PFAS containing products, thereby reducing the opportunity for drinking water and ground water contamination

ARGUMENTS IN OPPOSITION: This measure is opposed by a coalition of business organizations and consumer product manufacturers. The coalition opposing this measure writes:

Our manufacturers do not intentionally add PFAS to serve any functional or technical effect in menstrual products. Our coalition supports the responsible production, use, and management of fluorinated substances, including regulatory requirements that protect human health and the environment. Given menstrual products are an essential product for women's health, our coalition is supportive of the policy direction in AB 2515.

Unfortunately, AB 2515 creates a framework that punishes manufacturers that are NOT intentionally adding PFAS to menstrual products by extending expansive liabilities for the unintentional presence of PFAS chemicals, at or above 10 PPM. The challenge of unintentional PFAS contamination is that it may exist beyond what a manufacturer can control. PFAS are ubiquitous, as they are detected in air emissions, wastewater, soils, surface water, and groundwater and can also be found with no apparent source. As a result, contamination can occur at any point during the product's life cycle – at the point of manufacturing and packaging, shipping and receiving, even the handling or use of the product by a consumer.

AB 2515 is not clear on what the scope of the violation would be if a single item were to be tested to contain levels above the specified threshold. Specifically, it would be helpful to understand whether, when a single tampon, pad or other individual item is tested, the intent of the language is that a detect over the threshold will constitute a violation on a per item

basis, whether the violation would include any sales of that item (e.g., in various pack configurations), or something in between (e.g., if the item tested was in a 16-ct. pack, then the violation is any sales of that specific pack). Clarifying language, which our coalition provided to the author to resolve the issue and hope will be accepted, would be helpful so that companies are clear as to the scope of a violation.

REGISTERED SUPPORT / OPPOSITION:

Support

A Voice for Choice Advocacy
American College of Obstetricians and Gynecologists District IX
California Professional Firefighters
California Environmental Voters
California Water Association
California Women's Law Center
Cleaneart4kids.org
Educate. Advocate.
Los Angeles County Sanitation Districts
Orange County Sanitation District
Planned Parenthood Affiliates of California
Reproductive Freedom for All
One Individual

Opposition

American Chemistry Council
American Forest & Paper Association
California Chamber of Commerce
California Manufacturers & Technology Association
California Manufacturers and Technology Association
Center for Baby and Adult Hygiene Products
Civil Justice Association of California

Analysis Prepared by: Nicholas Liedtke / JUD. / (916) 319-2334

Date of Hearing: April 9, 2024

ASSEMBLY COMMITTEE ON ENVIRONMENTAL SAFETY AND TOXIC MATERIALS

Eduardo Garcia, Chair

AB 2515 (Papan) – As Amended April 4, 2024

SUBJECT: Menstrual products: perfluoroalkyl and polyfluoroalkyl substances (PFAS)

SUMMARY: Prohibits a person from manufacturing, distributing, selling, or offering for sale a menstrual product that contains regulated perfluoroalkyl or polyfluoroalkyl substances (PFAS), as defined. Specifically, **this bill:**

- 1) States that the provisions of the bill shall be known as, and may be cited as, the Take All Menstrual Product-PFAS Out Now (T.A.M.P.O.N.) Act.
- 2) Defines "menstrual product" as a product used to collect menstruation and vaginal discharge, including, but not limited to, tampons, pads, sponges, menstruation underwear, disks, and menstrual cups, whether disposable or reusable.
- 3) Defines "perfluoroalkyl and polyfluoroalkyl substances" or "PFAS" as a class of fluorinated organic chemicals containing at least one fully fluorinated carbon atom.
- 4) Defines "regulated perfluoroalkyl and polyfluoroalkyl substances or PFAS" as either of the following:
 - a. Commencing January 1, 2025, PFAS that a manufacturer has intentionally added to a product and that have a functional or technical effect in the product, including the PFAS components of intentionally added chemicals and PFAS that are intentional breakdown products of an added chemical that also have a functional or technical effect in the product; or,
 - b. Commencing January 1, 2027, the presence of PFAS in a product or product component at or above 10 parts per million (PPM), as measured in total organic fluorine.
- 5) Authorizes the Department of Toxic Substances Control (DTSC) to adopt regulations or guidance as necessary for the purpose of implementing, administering, and enforcing the provisions of the bill.
- 6) Requires DTSC to issue guidance as it relates to testing for the presence of regulated PFAS in menstrual products.
- 7) Exempts guidance on testing for the presence of regulated PFAS in menstrual products from the requirements of the Administrative Procedure Act.
- 8) Prohibits a person from manufacturing, distributing, selling, or offering for sale in the state a menstrual product that contains regulated PFAS.
- 9) Authorizes DTSC, if it finds that a menstrual product contains regulated PFAS and it reasonably suspects that imminent harm would result from the continued sale of the product, to issue a cease and desist order to the manufacturer of the menstrual product.

- 10) Authorizes any person to bring a civil action in a court of competent jurisdiction for any injury suffered as a result of a product sold in violation of the prohibitions in this bill.
- 11) Authorizes exemplary damages to also be awarded in any action brought pursuant to the provisions of this bill.
- 12) Provides that a violation of the prohibitions in this bill is punishable by a civil penalty not to exceed five thousand dollars (\$5,000) per day.
- 13) Provides that a second and subsequent violation of the prohibitions in this bill is punishable by a civil penalty not to exceed ten thousand dollars (\$10,000) per day.
- 14) Authorizes the court to grant injunctive relief in any action brought pursuant to the provisions of this bill.
- 15) Authorizes actions to be brought pursuant to the provisions in this bill by the Attorney General in the name of the people of the state by the request of DTSC, by a city attorney, by a county counsel, or by a city prosecutor in a city or city and county having a full-time city prosecutor.
- 16) Requires that a prevailing plaintiff bringing an action pursuant to the provisions of this bill be awarded attorney's fees and costs by the court.
- 17) Requires that moneys from penalties collected pursuant to the provisions of this bill be deposited in the T.A.M.P.O.N. Act Fund (Fund), which the bill creates in the State Treasury.
- 18) Requires that the moneys deposited in the Fund be available, upon appropriation by the Legislature, for expenditure by DTSC exclusively for the support of DTSC in carrying out the duties and responsibilities under the provisions of this bill.

EXISTING LAW:

- 1) Requires, commencing January 1, 2022, a person that sells firefighter personal protective equipment to provide a written notice to the purchaser if the firefighter personal protective equipment contains intentionally added PFAS chemicals. (Health and Safety Code (HSC) § 13029 (b)(1))
- 2) Prohibits, commencing January 1, 2022, a manufacturer of class B firefighting foam from manufacturing, or knowingly selling, offering for sale, distributing for sale, or distributing for use, and a person from using, class B firefighting foam containing intentionally added PFAS chemicals. (HSC § 13061 (b)(1))
- 3) Prohibits, on and after July 1, 2023, a person, including, but not limited to, a manufacturer, from selling or distributing in commerce in this state any new, not previously owned, juvenile product, as defined, that contains intentionally added PFAS or PFAS at or above 100 ppm, as measured in total organic fluorine. (HSC § 108946)
- 4) Prohibits, on or after January 1, 2025, a person from manufacturing, distributing, selling, or offering for sale in the state any new, not previously used, textile articles that contain

intentionally added PFAS, or PFAS at or above 100 PPM, and on or after January 1, 2027, 50 PPM, as measured in total organic fluorine. (HSC § 108971)

- 5) Prohibits, commencing January 1, 2025, a person or entity from manufacturing, selling, delivering, holding, or offering for sale, in commerce any cosmetic product that contains any specified intentionally added ingredients, including some PFAS chemicals. (HSC § 108980 (a))
- 6) Prohibits, commencing January 1, 2025, a person or entity from manufacturing, selling, delivering, holding, or offering for sale in commerce any cosmetic product that contains intentionally added PFAS. (HSC § 108981.5)
- 7) Prohibits, commencing January 1, 2023, a person from distributing, selling, or offering for sale in the state any food packaging that contains intentionally added PFAS or PFAS at or above 100 ppm, as measured in total organic fluorine. (HSC § 109000)
- 8) Authorizes the State Water Resources Control Board (State Water Board) to order a public water system to monitor for PFAS; requires community water systems to report detections; and, where a detected level of these substances exceeds the response level, to take a water source out of use or provide a prescribed public notification. (HSC § 116378)
- 9) Requires a package or box containing menstrual products that was manufactured on or after January 1, 2023, for sale or distribution in this state to have printed on the label a plain and conspicuous list of all intentionally added ingredients in the product. (HSC § 111822.2)

Under the California Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65):

- 1) Prohibits a person, in the course of doing business, from knowingly discharging or releasing a chemical known to the state to cause cancer or reproductive toxicity into water or onto or into land where such chemical passes or probably will pass into any source of drinking water. (HSC § 25249.5)
- 2) Prohibits a person, in the course of doing business, from knowingly and intentionally exposing any individual to a chemical known to the state to cause cancer or reproductive toxicity without first giving clear and reasonable warning to such individual. (HSC § 25249.6)
- 3) Requires the Governor to publish a list of chemicals known to cause cancer or reproductive toxicity and to annually revise the list. The Office of Environmental Health Hazard Assessment (OEHHA) has listed perfluorooctanoic acid (PFOA) and perfluorooctane sulfonate (PFOS), which are members of the PFAS class, as chemicals known to the state to cause developmental toxicity. (HSC § 25249.8)

Under the Safer Consumer Products (Green Chemistry) statutes:

- 1) Requires the DTSC to adopt regulations to establish a process to identify and prioritize chemicals or chemical ingredients in consumer products that may be considered chemicals of concern, as specified. (HSC § 25252)

- 2) Requires DTSC to adopt regulations to establish a process to evaluate chemicals of concern in consumer products, and their potential alternatives, to determine how to best limit exposure or to reduce the level of hazard posed by a chemical of concern. (HSC § 25253 (a))
- 3) Specifies, but does not limit, regulatory responses that DTSC can take following the completion of an alternatives analysis, ranging from no action, to a prohibition of the chemical in the product. (HSC § 25253)

FISCAL EFFECT: Unknown

COMMENTS:

Need for the bill: According to the author, "These once ubiquitous, forever compounds have been linked to health problems, including breast and other cancers, hormone disruption, kidney and liver damage, thyroid disease, developmental harm, and immune system disruption. The presence of PFAS in menstrual products contributes to existing gender health inequities as exposure to PFAS is almost unavoidable. In a recent study, 48% of sanitary pads, incontinence pads, and panty liners tested were found to contain PFAS, as were 22% of tampons. Additionally, menstrual products have shown higher levels of PFAS than are found in tap water.

AB 2515 takes a critical step towards protecting women's health and reducing the amount of PFAS in the environment by eliminating polyfluoroalkyl substances (PFAS) from menstrual products. California's pursuit for gender equity and clean drinking waters requires action to ensure that feminine hygiene products are safe, clean and free from forever chemicals. With viable alternatives available, there is no longer a good rationale for their use in menstrual products. Women's health must be prioritized over the use of these unnecessary chemicals. It's past time to protect women and our environment."

Perfluoroalkyl and polyfluoroalkyl substances (PFAS): PFAS are synthetic, highly fluorinated substances that have been widely used in industrial and consumer applications for their heat, water, and lipid resistance properties for more than seven decades. In consumer products, PFAS are used in carpets, furniture fabrics, apparel, paper packaging for food, non-stick cookware, personal care products, and other products designed to be waterproof; grease, heat, water and stain resistant; or, non-stick. Commercial applications span many sectors of the economy, including aerospace, automotive, building and construction, pharmaceuticals, medical devices, paints, electronics, semiconductors, energy, oil and gas exploration, first responder safety, firefighting foams, and health care. During production, use, and disposal, PFAS can migrate into the soil, water, and air. Some PFAS are volatile, and can be carried long distances through the air, leading to contamination of soils and groundwater far from the emission source. Researchers have found PFAS in indoor and outdoor environments, plants, soil, food, drinking water, wildlife, companion animals, production animals, and humans at locations across the nation and around the globe. PFAS are extremely persistent and degrade very slowly over time, which has resulted in their accumulation in the environment since the onset of their production in the late 1940s. Currently, nearly 15,000 PFAS chemicals are included in the chemicals database CompTox, which is maintained by the United States Environmental Protection Agency (US EPA).

Exposure to PFAS: The main route of exposure to PFAS is through ingestion of contaminated food or liquid (accounting for up to half of total exposure), through contact with consumer products, and through inhalation and ingestion of contaminated indoor air and dust. Food can

become contaminated with PFAS through soil and water used to grow the food, food packaging containing PFAS, and equipment that uses PFAS during processing. Some foods, such as fish, meat, eggs, and leafy vegetables, may contain PFAS due to bioaccumulation and crop uptake. Studies have shown that PFAS can transfer from pregnant mothers to their fetuses via the placenta during gestation, as well as transfer from nursing mothers to their infants via breastfeeding. Dermal exposure is also possible when people touch products treated with PFAS, such as carpets or clothing. Young children may be exposed to higher levels of PFAS than adults because they ingest more dust containing PFAS and mouth PFAS-treated consumer products. Workers, such as carpet installers, carpet cleaners, firefighters, and workers in furniture, furnishings, outdoor clothing, and carpet stores, may also experience above average PFAS exposure levels.

Exposure to PFAS in drinking water is an escalating concern due to the persistence of PFAS chemicals in the environment and their tendency to accumulate in groundwater. Groundwater PFAS contamination typically has been associated with industrial facilities where these chemicals were manufactured or are used in other products, and in airfields where the chemicals have been used for firefighting. PFAS chemicals can also enter the environment and drinking water through composting, landfilling, recycling, and incineration of products containing PFAS. The State Water Board indicates that the four major sources of PFAS in drinking water in California are fire training/fire response sites, industrial sites, landfills, and wastewater treatment plants/biosolids. The State Water Board notes that because of their presence and persistence in many drinking water supplies, PFAS remain a serious source of exposure decades after their release into the environment.

Like humans, wildlife is exposed to PFAS by consuming contaminated water or food. Within aquatic food webs, PFAS are found to increase in concentration from ambient water to plankton and further up the food chain.

Hazard traits of PFAS: According to DTSC, all PFAS display at least one of the hazard traits identified in California's Safer Consumer Products (Green Chemistry) Hazard Traits Regulations (22 C.C.R. § 69401 et seq.). An intrinsic property of PFAS is the extreme environmental persistence of either the individual compounds or their degradation products or both, resulting in their classification as "forever chemicals." Most PFAS are mobile in environmental media such as air and water, and thus are widespread in living organisms and the environment.

Scientific studies have shown that exposure to some PFAS can lead to adverse health outcomes in humans and animals. DTSC states that if humans are exposed to PFAS through diet, drinking water, or inhalation, some of these chemicals remain in the body for a long time. As people continue to be exposed to PFAS, the PFAS levels in their bodies may increase to the point that they suffer adverse health effects. According to the US EPA, current peer-reviewed scientific studies have shown that exposure to certain levels of PFAS may lead to: reproductive effects such as decreased fertility or increased high blood pressure in pregnant women; developmental effects or delays in children, including low birth weight, accelerated puberty, bone variations, or behavioral changes; increased risk of some cancers, including prostate, kidney, and testicular cancers; reduced ability of the body's immune system to fight infections, including reduced vaccine response; interference with the body's natural hormones; and, increased cholesterol levels and/or risk of obesity. In addition to direct human health impacts, some PFAS, may have high global warming potential. Also, several PFAS bioaccumulate significantly in animals or

plants and emerging evidence points to their phytotoxicity, aquatic toxicity, and terrestrial ecotoxicity.

The persistence and proliferation of PFAS chemicals makes it challenging to study and assess the overall potential human health and environmental risks of PFAS exposure.

Regulating PFAS as a class: DTSC adopted a rationale for regulating PFAS chemicals as a class, concluding, "it is both ineffective and impractical to regulate this complex class of chemicals with a piecemeal approach." This rationale was presented in the February, 2021, *Environmental Health Perspectives* article, "Regulating PFAS as a Chemical Class under the California Safer Consumer Products Program." The authors of the article state,

"The widespread use, large number, and diverse chemical structures of PFAS pose challenges to any sufficiently protective regulation, emissions reduction, and remediation at contaminated sites. Regulating only a subset of PFAS has led to their replacement with other members of the class with similar hazards, that is, regrettable substitutions. Regulations that focus solely on perfluoroalkyl acids (PFAAs) are ineffective, given that nearly all other PFAS can generate PFAAs in the environment... We at the California DTSC propose regulating certain consumer products if they contain any member of the class of PFAS because: *a)* all PFAS, or their degradation, reaction, or metabolism products, display at least one common hazard trait according to the California Code of Regulations, namely environmental persistence; and *b)* certain key PFAS that are the degradation, reaction or metabolism products, or impurities of nearly all other PFAS display additional hazard traits, including toxicity; are widespread in the environment, humans, and biota; and will continue to cause adverse impacts for as long as any PFAS continue to be used. Regulating PFAS as a class is thus logical, necessary, and forward-thinking."

Other researchers have made the case for managing PFAS as a chemical class, including in "Scientific Basis for Managing PFAS as a Chemical Class" published in June, 2020, in *Environmental Science & Technology Letters*, and "Strategies for grouping per- and polyfluoroalkyl substances (PFAS) to protect human and environmental health," also published in June, 2020, in *Environmental Science: Processes & Impacts*.

PFAS in menstrual products: In the United States, people who menstruate have their period, on average, for about 40 years of their life. During this time, they rely on a diverse range of menstrual products, including tampons, pads, menstrual cups, and period underwear. To illustrate the prevalence of PFAS in menstrual products, the author of the bill points to tests on menstrual products commissioned by the consumer watchdog site, *Mamavation*, and *Environmental Health News*. Conducted at US EPA-certified laboratories between 2020 and 2022, the tests detected organic fluorine, a marker for PFAS, in several menstrual products. For example, 22% of the 23 tampon products tested had indications of PFAS, including 2 products advertised as "organic." Forty eight percent of 46 different sanitary pads, panty liners, and incontinence pads tested had indications of PFAS, including several products marketed as "organic" and "natural." Finally, 65% of period underwear products tested, and 57% of the period underwear brands tested, had detectable levels of fluorine present.

To further investigate PFAS in menstrual products, in early 2023, the *Wirecutter* at the *New York Times* purchased and tested at a University of Notre Dame laboratory 44 different period and incontinence products and found:

- "Two of the 10 pairs of period underwear we sent showed high enough levels of fluorine to suggest that PFAS had been added to them at some point in the manufacturing process. Two of the remaining eight showed levels that suggested unintentional PFAS contamination. These included period underwear from brands that have published documentation certifying that their products are free of these substances.
- The four medical-grade silicone menstrual cups we sent for testing all showed very low levels of suspected PFAS.
- All of the reusable and disposable incontinence underwear we had tested, half of the disposable incontinence pads, and most of the reusable and disposable menstrual pads showed high enough levels of fluorine to suggest unintentional PFAS contamination, with six of the 24 products in these categories registering enough fluorine to suggest that PFAS had been added to them.
- All five of the tampons we sent for testing showed very low levels of suspected PFAS, though the applicator from one of them showed fluorine levels suggesting unintentional PFAS contamination."

Exposure to PFAS through menstrual products is particularly concerning because the vagina is an extremely vascular area and dermal exposure in the vaginal area is often higher than other places of the body. Additionally, people using menstrual products are of reproductive age, thus exposure could potentially impact unborn children, as well as the person using the product. Also, according to the *New York Times* article, experts are particularly concerned about the effects of PFAS during phases when the body is especially vulnerable, such as when someone gets their first period or is pregnant or is in menopause transition. During these times, the body and brain undergo major shifts, making them extra sensitive to endocrine disrupters.

This bill: This bill prohibits a person from manufacturing, distributing, selling, or offering for sale a menstrual product that contains regulated PFAS, as defined.

Recent US EPA action on PFAS: According to the US EPA, "Under the Biden-Harris Administration, [US] EPA has restored scientific integrity and accelerated the pace of research and actions needed to tackle the PFAS crisis and protect American communities." On October 18, 2021, US EPA Administrator Michael S. Regan announced the agency's PFAS Strategic Roadmap, which laid out a whole-of-agency approach to addressing PFAS. The roadmap sets timelines by which US EPA plans to take specific actions and commits to, "bolder new policies to safeguard public health, protect the environment, and hold polluters accountable."

The US EPA reported that since the roadmap's release in October 2021, it has taken a number of key actions to address PFAS, including publishing a rule that will require all manufacturers (including importers) of PFAS to report information on PFAS uses, production volumes, disposal, exposures, and hazards; initiating nationwide monitoring of 29 PFAS in drinking water systems; allocating \$2 billion to address emerging contaminants, including PFAS, in drinking water across the country; and, releasing a framework for addressing new PFAS and new uses of PFAS under the Toxic Substances Control Act (TSCA). US EPA states that the framework will ensure that before these chemicals are allowed to enter into commerce, US EPA will undertake an extensive evaluation to ensure they pose no harm to human health and the environment.

State action on PFAS: California has undertaken efforts to address PFAS substances across several state entities. For example, at DTSC, all PFAS chemicals are "Candidate Chemicals"

under the Safer Consumer Products (SCP, previously known as Green Chemistry) Program, because they exhibit a hazard trait and/or an environmental or toxicological endpoint, and the entire class of PFAS was added by the California Environmental Contaminant Biomonitoring Program to its list of priority chemicals.

On July 1, 2021, DTSC designated carpets and rugs containing PFAS as a "Priority Product." A Priority Product is a consumer product identified by DTSC that contains one or more Candidate Chemicals and that has the potential to contribute to significant or widespread adverse impacts to humans or the environment. The Priority Product designation required domestic and foreign carpet and rug manufacturers that use PFAS and related chemicals in their products to submit information on all of the manufacturer's products that contain PFAS and are sold in California, by August 30, 2021. Manufacturers were then required to show intent to remove or replace PFAS in their products, remove the product from the market, or identify potential alternatives to PFAS to be used in the product by December 28, 2021. This process is ongoing.

In regulations that went into effect on April 1, 2022, DTSC also designated treatments containing PFAS for use on converted textiles or leathers such as carpets, upholstery, clothing, and shoes as a Priority Product. Domestic and foreign manufacturers of treatments for converted textiles or leathers that contain any member of the class of PFAS selling their products in California were required to submit information on those products by May 31, 2022. After submitting the required information, manufacturers were then required to show intent to mitigate exposure to PFAS in their products by September 28, 2022. This process is ongoing.

DTSC appears to be evaluating artificial turf with PFAS. Previously, DTSC proposed investigating PFAS in other product categories, such as food packaging and children's products, but during the investigative period the Legislature prohibited PFAS in those product categories and it appears DTSC has shifted its resources to investigating other product/ chemical combinations.

OEHHA, under the Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65), listed PFOA and PFOS as chemicals known to the state to cause reproductive toxicity. In July, 2021, OEHHA announced the release of a draft document for public review describing proposed Public Health Goals (PHGs) for PFOA and PFOS in drinking water. A PHG is the level of a chemical contaminant in drinking water that does not pose a significant risk to health. PHGs published by OEHHA are considered by the State Water Board in setting drinking water regulatory standards (Maximum Contaminant Levels, or MCLs) for California.

The State Water Board has taken a number of recent actions related to PFAS in drinking water, including several investigative orders to public water systems requiring testing for PFAS. Most recently, it issued General Order DW 2024-0002-DDW (2024 Order), in March 2024, to public water systems for monitoring PFAS in community public water systems serving disadvantaged and severely disadvantaged communities. The purpose of this monitoring is to understand PFAS's impacts on drinking water in these communities.

Recently, the State Legislature has also taken action on PFAS by enacting a slew of bills prohibiting PFAS at different levels across many product categories. These include a ban on textiles that contain PFAS (AB 1817, Ting, Chapter 762, Statutes of 2022); a ban on cosmetic products that contain PFAS (AB 2771, Friedman, Chapter 804, Statutes of 2022); a ban on food packaging that contains PFAS (AB 1200, Ting, Chapter 503, Statutes of 2021); a ban on new

juvenile products that contain PFAS (AB 652, Freidman, Chapter 500, Statutes of 2021); and, a ban on firefighting foam containing PFAS (SB 1044, Allen, Chapter 308, Statutes of 2020). The Legislature also authorized the State Water Board to order public water systems to monitor for PFAS and required municipalities to notify consumers of PFAS detected above notification levels (AB 756, C. Garcia, Chapter 162, Statutes of 2019).

Chemical bans and the Safer Consumer Products Program: In 2008, California enacted AB 1879 (Feuer and Huffman, Chapter 559, Statutes of 2008) to establish a regulatory process for identifying and prioritizing chemicals of concern in consumer products, to create methods for analyzing alternatives to existing hazardous chemicals, and to ultimately take regulatory action to reduce the level of harm from the chemicals in those products. DTSC did this by promulgating the Safer Consumer Products regulations, which took effect in October 2013. DTSC's approach provides science-based criteria and procedures for identifying and evaluating alternatives with the objective of replacing chemicals of concern with safer chemicals and avoiding the use of substitute chemicals that pose equal or greater harm.

While the intent of AB 1879 is to establish a robust and thorough regulatory process rooted in science to consider exposure to chemicals in consumer products, it has long been recognized that DTSC does not have the resources to evaluate all, or even a significant percentage of, chemicals in every consumer product application. The permutations of product and chemical combinations are virtually limitless. To that end, the Safer Consumer Products statute does not preclude the Legislature from taking legislative action on the use of chemicals in consumer products. When there is credible scientific evidence to support a change in state policy to protect public health, the Legislature can respond to that science more expeditiously than can DTSC. Since AB 1879 was enacted, the Legislature has enacted policies on various chemical-product applications, which include, in addition to the PFAS prohibitions listed above, a ban on flame retardants in children's products, mattresses, and upholstered furniture (AB 2998, Bloom, Chapter 924, Statutes of 2018); a ban on BPA in toddler sippy cups and bottles (AB 1319, Butler, Chapter 467, Statutes of 2011); a ban on the sale of jewelry with cadmium at certain levels (AB 929, Pavley, Chapter 313, Statutes of 2010); and, a ban on the sale of brake pads containing copper in exceedances of certain levels (SB 346, Kehoe, Chapter 307, Statutes of 2010).

DTSC, in fact, wrote in support of AB 1319 (Butler) stating: "DTSC does not believe that the [Safer Consumer Products] regulations should ever be viewed as excluding action that the Legislature might take to address specific product related concerns that are brought to its attention. Not only have the regulations taken longer to adopt than originally anticipated, DTSC also expects that the process to be represented in the regulations will be subject to time and resource constraints. There may be circumstances that warrant more timely action than DTSC can accommodate through its process."

Acceptable levels of PFAS in products: This bill prohibits, in menstrual products, intentionally added PFAS, and, commencing January 1, 2027, PFAS at or above 10 PPM, as measured in total organic fluorine. Existing statute sets different thresholds for PFAS in different product categories, including 100 PPM for juvenile products, textile articles, and food packaging. Since the bills were enacted that set the 100 PPM standard in statute, science has emerged indicating that 100 PPM might not be protective enough, especially for some sensitive subpopulations. While this bill authorizes DTSC to enforce the provisions of the bill, it sets a standard of 10 PPM without the benefit of an investigation or study by DTSC's team of scientists, who have related public health backgrounds. If standard-setting authority were conferred on DTSC, its team could

set the appropriately protective thresholds, and update the threshold through regulation consistent with emerging science. Instead, the Legislature is tasked with setting the appropriately protective standard in statute, and presumably updating those statutory thresholds by legislation when needed.

This bill: This bill prohibits, commencing January 1, 2027, the presence of PFAS in a product or product component at or above 10 PPM, as measured in total organic fluorine. For the 10 PPM threshold set in this bill, the author's office points to the European Union's limit for PFOS, for which they reference the Regulation on the Use of Persistent Organic Chemicals from 2019, in Annex I, Part A.

Governor's action on PFAS bills: In 2023, Governor Gavin Newsom vetoed three bills prohibiting the use of PFAS in several product categories, including AB 246 (Papan, 2023), which was similar to AB 2515. AB 246 would have prohibited, commencing January 1, 2025, a person from manufacturing, distributing, selling, or offering for sale menstrual products that contain PFAS at or above 10 PPM (for a detailed list of related previous and current legislation, see the "Related legislation" section of this analysis). The three bills received similar veto messages. The message for AB 246 read:

"To the Members of the California State Assembly:

I am returning Assembly Bill 246 without my signature.

This bill would prohibit, by 2025, the manufacture, distribution, or sale of menstrual products that contain intentionally added perfluoroalkyl or polyfluoroalkyl substances (PFAS) at a certain concentration level, as well as limit, by 2027, the concentration of total organic fluorine in menstrual products.

This is one of three single-product chemical bans passed by the Legislature this year that attempt to address serious concerns with the presence of PFAS in consumer products. These bills do not identify or require any regulatory agency to determine compliance with, or enforce, the proposed statute.

While I strongly support the author's intent and have signed similar legislation in the past, I am concerned that this bill falls short of providing enhanced protection to California consumers due to lack of regulatory oversight. Previously enacted single-product chemical bans, which also lack oversight, are proving challenging to implement, with inconsistent interpretations and confusion among manufacturers about how to comply with the restrictions.

In order to instill consumer confidence and effectively address public health and environmental concerns, I am directing the Department of Toxic Substances Control to engage with the author and the Legislature and consider alternative approaches to regulating the use of these harmful chemicals in consumer products.

For these reasons, I cannot sign this bill.

Sincerely,

Gavin Newsom"

This bill: Unlike AB 246, this bill authorizes DTSC to adopt regulations or guidance as necessary for the purpose of implementing, administering, and enforcing the prohibition of PFAS in menstrual products, as delineated in the bill. It also requires DTSC to issue guidance as it relates to testing for the presence of regulated PFAS in menstrual products, and it exempts that guidance from the requirements of the Administrative Procedure Act. This exemption could allow DTSC to move quickly on establishing guidance as it relates to testing for the presence of regulated PFAS in menstrual products, but it would also permit DTSC to bypass the public rulemaking process requirements of the Administrative Procedure Act. The bill also gives DTSC additional enforcement authority by authorizing it to, if it finds that a menstrual product contains regulated PFAS and it reasonably suspects that imminent harm would result from the continued sale of the product, issue a cease and desist order to the manufacturer of the menstrual product. As this bill moves through the legislative process, the author may wish to consider whether to include the guidance on testing requirements and the cease and desist authority in DTSC's authority to promulgate regulations.

Additional enforcement provisions: In addition to the enforcement authority conferred upon DTSC, AB 2515 authorizes any person to bring a civil action in a court of competent jurisdiction for any injury suffered as a result of a product sold in violation of the prohibitions in this bill; authorizes exemplary damages to also be awarded in any action brought pursuant to the provisions of this bill; provides for specified civil penalties; authorizes the court to grant injunctive relief in any action brought pursuant to the provisions of this bill; authorizes specified public attorneys to take actions to enforce the provisions in this bill; and requires that a prevailing plaintiff bringing an action pursuant to the provisions of this bill be awarded attorney's fees and costs by the court. These enforcement authorities will be analyzed further by the Assembly Judiciary Committee, should this bill be approved by the Assembly Environmental Safety and Toxic Materials Committee.

Arguments in support: The American College of Obstetricians and Gynecologists District IX (ACOG) writes in support, "Exposure to toxic chemicals can have many harmful effects on health. These chemicals disrupt the body's endocrine system, which makes hormones and sends them throughout your body. This means chemicals can affect many parts of your body, including your thyroid gland, brain, reproductive organs, and immune system. Chemicals can disrupt cells and contribute to cancer... Since the 1990s, we've called substances that have these harmful effects on the body "endocrine disruptors." There are many different types of endocrine disruptors, including lead and chemicals called parabens, phthalates, and PFAS, which are addressed in this bill. PFAS are widely used substances that break down very slowly, earning them the name "forever chemicals." This makes them especially harmful to our health. Given the harmful effects of PFAS, California has been focused on removing or limiting PFAS from our products. AB 2515 makes another logical step to remove and limit PFAS from menstrual products."

Los Angeles County Sanitation Districts writes in support, "AB 2515 would provide important protection from PFAS by controlling a potential source of this class of "forever chemicals" that have been shown to cause increased incidences of cancer and reproductive harm. In addition to the potential direct exposure to an individual, menstrual products containing PFAS are often flushed down the drain, or used products may be sent to solid waste facilities when disposed of

in the trash. Additionally, landfill leachate (rainwater that filters through wastes in a landfill and is collected for proper management) is often discharged to the sewer and contributes to PFAS loadings at wastewater treatment facilities. When taken together with contributions from numerous other sources, these pathways can lead to ubiquitous low concentrations of PFAS in wastewater, which may be recycled or discharged to the ocean or other local waterways. AB 2515 could not only enhance public health by minimizing exposure to these hazardous chemicals but could also reduce the influx of PFAS into waste streams and the environment. As a passive receiver of PFAS at our solid waste and wastewater facilities, the Districts support implementing source control measures that prevent PFAS from entering the waste stream or the environment."

Arguments in opposition: A coalition of opponents writes, "Our manufacturers do not intentionally add PFAS to serve any functional or technical effect in menstrual products. Our coalition supports the responsible production, use, and management of fluorinated substances, including regulatory requirements that protect human health and the environment. Given menstrual products are an essential product for women's health, our coalition is supportive of the policy direction in AB 2515.... Unfortunately, AB 2515 creates a framework that punishes manufacturers that are NOT intentionally adding PFAS to menstrual products by extending expansive liabilities for the unintentional presence of PFAS chemicals, at or above 10 PPM. The challenge of unintentional PFAS contamination is that it may exist beyond what a manufacturer can control. AB 2515 creates a brand-new private right of action (PRA)... and the ability to levy punitive damages. PRAs bring unintended consequences and increase frivolous litigation on California businesses... AB 2515, and its prohibition on intentionally added PFAS, is laudable. However, the provisions establishing the PRA and accompanying punitive damages are wrongly placed. Punitive damages are generally warranted when a party's actions are malicious, intentional, or are grossly negligent. Punitive damages are structured to deter a party from repeating certain misconduct in the future. In the case of AB 2515, manufacturers are not intentionally adding PFAS or wishing to harm consumers. Manufacturers are responsibly not using these chemicals but will face lawsuits accusing them of malfeasance even though they have removed any intentional application of PFAS to the product... If the private right of action and punitive damages provisions in AB 2515 are removed from the bill, we believe the primary remaining issue is resolvable.... AB 2515 is not clear on what the scope of the violation would be if a single item were to be tested to contain levels above the specified threshold. Specifically, it would be helpful to understand whether, when a single tampon, pad or other individual item is tested, the intent of the language is that a detect over the threshold will constitute a violation on a per item basis, whether the violation would include any sales of that item (e.g., in various pack configurations), or something in between (e.g., if the item tested was in a 16-ct. pack, then the violation is any sales of that specific pack). Clarifying language, which our coalition provided to the author to resolve the issue and hope will be accepted, would be helpful so that companies are clear as to the scope of a violation."

Related legislation:

1. AB 2761 (Hart). Prohibits, beginning January 1, 2026, the sale, use, and manufacture of plastic packaging that contains PFAS or polyvinyl chloride (PVC), inclusive of polyvinylidene chloride (PVDC). This bill is pending in the Assembly Environmental Safety and Toxic Materials Committee.
2. SB 903 (Skinner). Prohibits, commencing January 1, 2030, a person from distributing, selling, or offering for sale in the state a product that contains intentionally PFAS.

Authorizes DTSC to establish regulations to administer the prohibition. This bill is pending in the Senate Judiciary Committee.

3. AB 347 (Ting). Requires DTSC to take a number of actions regarding implementation of existing laws dealing with PFAS in food packaging and cookware, including adopting and publishing guidance and testing products. This bill is currently on the inactive file on the Senate floor.
4. AB 246 (Papan, 2023). Would have prohibited, commencing January 1, 2025, a person from manufacturing, distributing, selling, or offering for sale in the state menstrual products that contain PFAS at or above 10 PPM. This bill was vetoed by Governor Gavin Newsom.
5. AB 727 (Weber, 2023). Would have prohibited, beginning January 1, 2025, a person from manufacturing, selling, delivering, distributing, holding, or offering for sale, a cleaning product that contains intentionally-added PFAS or PFAS at or above 50 PPM, and on January 1, 2027, a cleaning product that contains PFAS at or above 25 PPM. This bill was vetoed by Governor Gavin Newsom.
6. AB 1423 (Schiavo, 2023). Would have prohibited, commencing January 1, 2025, a person or entity from manufacturing, distributing, selling, or offering for sale in the state any covered surface that contains PFAS at or above 20 PPM, and, commencing January 1, 2024, a public entity, a public or private school, or a public or private institution of higher learning, as specified, from purchasing or installing a covered surface that contains PFAS at or above 20 PPM. This bill was vetoed by Governor Gavin Newsom.
7. AB 1817 (Ting, Chapter 762, Statutes of 2022). Prohibits, beginning January 1, 2024, a person from distributing, selling, or offering for sale in the state a textile article, as defined, that contains regulated PFAS, and requires a manufacturer to use the least toxic alternative when removing regulated PFAS in textile articles to comply with the provisions of the bill.
8. AB 2771 (Friedman, Chapter 804, Statutes of 2022). Prohibits, commencing January 1, 2025, a person or entity from manufacturing, selling, delivering, holding, or offering for sale in commerce any cosmetic product that contains intentionally added PFAS.
9. AB 1200 (Ting, Chapter 503, Statutes of 2021). Prohibits, commencing January 1, 2023, the sale of food packaging that contains PFAS; requires, commencing January 1, 2024, cookware manufacturers to label their product if it contains an intentionally added chemical on specified lists; and prohibits, commencing January 1, 2023, for the internet and January 1, 2024, for the cookware package, a cookware manufacturer from making a claim that cookware is free of a chemical, unless no chemical from that chemical class is intentionally added to the cookware.
10. AB 652 (Freidman, Chapter 500, Statutes of 2021). Prohibits, on or after July 1, 2023, a person from selling or distributing in commerce any new juvenile products that contain PFAS.
11. SB 1044 (Allen, Chapter 308, Statutes of 2020). Prohibits the manufacture, sale, distribution, and use of firefighting foam containing PFAS chemicals by January 1, 2022,

with some exceptions, and requires notification of the presence of PFAS in the protective equipment of firefighters.

12. SB 1056 (Portantino, 2020). Would have required the State Water Board to establish an analytical laboratory method that can be used as a tool to assess the extent of PFAS contamination in drinking water, surface water, groundwater, and wastewater. This bill was held in the Senate Environmental Quality Committee.
13. AB 1989 (C. Garcia, Chapter 272, Statutes of 2020). Requires a package or box containing menstrual products that was manufactured on or after January 1, 2023, for sale or distribution in this state to have printed on the label a plain and conspicuous list of all intentionally added ingredients, as defined.
14. AB 756 (C. Garcia, Chapter 162, Statutes of 2019). Authorizes the State Water Board to order one or more public water systems to monitor for PFAS and requires municipalities to notify consumers for PFAS detected above notification levels.
15. AB 841 (Ting, Chapter 372, Statutes of 2019). As heard by the Assembly, would have required OEHHA to assess PFAS substances, especially as they might be found in drinking water, to determine which might pose a potential risk to human health. The contents of this bill were deleted in the Senate and amended with unrelated content.
16. AB 958 (Ting, 2018). Would have required a manufacturer of food packaging or cookware sold in the state to visibly disclose on an exterior location of the food packaging or cookware packaging a specified statement relating to the presence of PFAS in the product. This bill was held on the Senate Floor.
17. SB 1313 (Corbett, 2008). Would have prohibited the manufacture, sale, or distribution of any food contact substance, as defined, which contains perfluorinated compounds, as defined, in any concentration exceeding 10 parts per billion. This bill was vetoed by Governor Arnold Schwarzenegger.

Double referral: This bill was referred to the Assembly Environmental Safety and Toxic Materials Committee and the Assembly Judiciary Committee. Should this bill be approved by the Assembly Environmental Safety and Toxic Materials Committee, it will be referred to the Assembly Judiciary Committee.

REGISTERED SUPPORT / OPPOSITION:

Support

A Voice for Choice Advocacy
American College of Obstetricians and Gynecologists District IX
Breast Cancer Prevention Partners
California Professional Firefighters
California Women's Law Center
Cleaneearth4kids.org
Educate. Advocate.
Los Angeles County Sanitation Districts
Orange County Sanitation District

Planned Parenthood Affiliates of California
Reproductive Freedom for All

Opposition

American Chemistry Council
American Forest & Paper Association
California Chamber of Commerce
California Manufacturers and Technology Association
Center for Baby and Adult Hygiene Products
Civil Justice Association of California

Analysis Prepared by: Shannon McKinney / E.S. & T.M. /



CONSUMER
HEALTHCARE
PRODUCTS
ASSOCIATION

Taking healthcare personally.



CIVIL JUSTICE
ASSOCIATION OF CALIFORNIA

April 12, 2024

The Honorable Ash Kalra
Chair, Assembly Committee on Judiciary
1020 N Street, Room 104
Sacramento, CA 95814

RE: Assembly Bill 2515 (Papan). Menstrual Products: Perfluoroalkyl and Polyfluoroalkyl Substances – Oppose

Dear Assembly Member Kalra:

The California Manufacturers & Technology Association (CMTA) and the organizations listed are regrettably opposed to Assembly Bill (AB) 2515 (Papan) which would prohibit the sale of menstrual products that contain virtually any amount of “regulated perfluoroalkyl and polyfluoroalkyl substances (PFAS),” which is defined to include not only intentionally added PFAS but more broadly to include the presence of organic fluorine at or above 10 parts per million (PPM). Unlike the previous version of the legislation, Assembly Bill 246 (Papan, 2023) that was vetoed by Governor Newsom, AB 2515 now includes a private right of action (PRA) and the ability to levy punitive damages against manufacturers of these covered products.

Our manufacturers do not intentionally add PFAS to serve any functional or technical effect in menstrual products. Our coalition supports the responsible production, use, and management of fluorinated substances, including regulatory requirements that protect human health and the environment. Given menstrual products are an essential product for women’s health, our coalition is supportive of the policy direction in AB 2515.

Unfortunately, AB 2515 creates a framework that punishes manufacturers that are **NOT** intentionally adding PFAS to menstrual products by extending expansive liabilities for the unintentional presence of PFAS chemicals, at or above 10 PPM. The challenge of unintentional

PFAS contamination is that it may exist beyond what a manufacturer can control. PFAS are ubiquitous, as they are detected in air emissions, wastewater, soils, surface water, and groundwater and can also be found with no apparent source. As a result, contamination can occur at any point during the product's life cycle – at the point of manufacturing and packaging, shipping and receiving, even the handling or use of the product by a consumer.

Manufacturers fully intend to comply with these prohibitions on intentionally added PFAS and understand the need for practical regulation in this space, however, unavoidable trace quantities of a chemical may be present and beyond the manufacturer's control. Any enforcement must take into consideration the pervasiveness of PFAS and that manufacturers are not intentionally adding the chemical to these products. Enforcement should not act as a mechanism that limits product availability or drives consumer uncertainty as to product safety, but instead be justly focused on any bad actors who are intentionally adding PFAS chemicals to their respective products.

Creates a New Private Right of Action Leading to Frivolous Lawsuits

AB 2515 creates a brand-new private right of action (PRA) in California under section 108993 and the ability to levy punitive damages. PRAs bring unintended consequences and increase frivolous litigation on California businesses. The Legislature should avoid creating yet another law providing plaintiff's attorneys with an additional avenue to "act" as an agent of the state for failing to fully identify or require any appropriate regulatory agency to determine compliance with, or enforce, the many prohibitions relating to PFAS in consumer products.

AB 2515, and its prohibition on intentionally added PFAS, is laudable. However, the provisions establishing the PRA and accompanying punitive damages are wrongly placed. Punitive damages are generally warranted when a party's actions are malicious, intentional, or are grossly negligent. Punitive damages are structured to deter a party from repeating certain misconduct in the future. In the case of AB 2515, manufacturers are not intentionally adding PFAS or wishing to harm consumers. Manufacturers are responsibly not using these chemicals but will face lawsuits accusing them of malfeasance even though they have removed any intentional application of PFAS to the product.

Creating a new private right of action and providing for extraordinary damages will incentivize frivolous litigation and hurt California manufacturers who have eliminated PFAS from menstrual products. As an added consequence, it is unknown what impact this legislation will have on the availability and affordability of these critical products.

Fails to Define What Constitutes a "Violation"

If the private right of action and punitive damages provisions in AB 2515 are removed from the bill, we believe the primary remaining issue is resolvable.

AB 2515 is not clear on what the scope of the violation would be if a single item were to be tested to contain levels above the specified threshold. Specifically, it would be helpful to understand whether, when a single tampon, pad or other individual item is tested, the intent of the language is that a detect over the threshold will constitute a violation on a per item basis, whether the violation would include any sales of that item (e.g., in various pack configurations), or something in between (e.g., if the item tested was in a 16-ct. pack, then the violation is any sales of that specific pack). Clarifying language, which our coalition provided to the author to

resolve the issue and hope will be accepted, would be helpful so that companies are clear as to the scope of a violation.

For these reasons, our coalition strongly opposes AB 2515.

Respectfully,

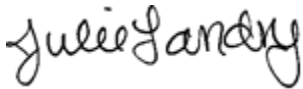


Rob Spiegel
Vice President, Government Relations
California Manufacturers & Technology Association

And on behalf of the following organizations:



Tim Shetek
American Chemistry Council



Julie Landry
American Forest & Paper Association



Adam Regele
California Chamber of Commerce



Eric Stewart
Center for Baby and Adult Hygiene Products



Jaime R. Huff
Civil Justice Association of California



John Hewitt
Consumer Brands Association



Carlos Gutierrez
Consumer Healthcare Products Association

AGENDA ITEM SUBMITTAL

Meeting Date: May 2, 2024	Budgeted: N/A
To: Communications/Leg. Liaison Cte. Board of Directors	Budgeted Amount: N/A
From: John Kennedy	Cost Estimate: N/A
Staff Contact: G. Ayala/A. Harasty	Funding Source: N/A
	Program/Line-Item No.: N/A
	General Counsel Approval: N/A
	Engineers/Feasibility Report: N/A
	CEQA Compliance: N/A

Subject: FEDERAL LEGISLATIVE UPDATE

SUMMARY

The Orange County Water District (OCWD) federal advocate and staff will provide an update on progress towards an exemption for water entities from PFAS liability, PFAS maximum contaminant level (MCL) compliance periods, PFAS destruction technology guidance, and funding for PFAS cleanup.

Attachments:

- ENS Resources May Update
- Federal Bill Matrix
- H.R. 7944 (Curtis – R-UT) Water Systems PFAS Liability Protection Act

RECOMMENDATION

Agendize for May 15 Board meeting: Take the following action:

Bill Number/Author	Short Title	Recommendation
H.R. 7944 (Curtis – R-UT)	Water Systems PFAS Liability Protection Act	Support

H.R. 7944 (Curtis – R-UT) Water Systems PFAS Liability Protection Act

The U.S. Environmental Protection Agency (USEPA) recently finalized a rule to impose CERCLA liability through the designation of PFAS chemicals as hazardous substances. The entities responsible for the PFAS pollution could attempt to unfairly shift the liability for the cost of contamination from themselves onto innocent water agencies like OCWD—and ultimately citizen ratepayers—in contravention of the spirit of CERCLA. Water systems need Congress’s help to prevent this. Consistent with the OCWD 2024 legislative platform, in February, OCWD sent a support letter for legislation that provides the water industry with an exemption from CERCLA liability as PFAS is now listed as a hazardous substance, “S. 1430 (Lummis R-WY) The Water Systems PFAS Liability Protection Act.”

H.R. 7944 (Curtis – R-UT) is legislation that mirrors S. 1430. It is unknown if the Senate or House bill would prevail; therefore, it is recommended that OCWD take a support position on H.R. 7944.

PFAS Funding & Liability Protection

- OCWD and retail water agencies will apply for Congresswoman Steel’s Community Project Funding (Earmark) for PFAS cleanup as the application process just opened.
- In March, OCWD applied for Federal Community Project Funding (Earmark) funding of \$5 million for PFAS cleanup projects from Senators Padilla and Butler and Congresswoman Kim. The City of Santa Ana applied for funding for PFAS cleanup from Congressman Correa which OCWD staff supported. Also, support letters were gained for OCWD’s Producers, Orange County Senators and Assembly Members. Per the guidelines, typical awards are from \$1 to \$2 million, and the maximum “ask” allowed is \$5 million.
- In March, the Environment and Public Works Committee had a hearing to allow committee members to hear about the concerns surrounding CERCLA liability for passive receivers if EPA designates PFAS as a hazardous substance. OCWD submitted written testimony. Please see “ENR Resources April Update” for additional information.
- In February, consistent with the OCWD 2024 legislative platform, OCWD sent a support letter for legislation that provides the water industry with an exemption from CERCLA liability if PFAS is listed as a hazardous substance; please see attached letter “S. 1430 (Lummis R-WY) The Water Systems PFAS Liability Protection Act – Support.”

ACTIVITIES

- February 26 OCWD and ACWA President, Cathy Green, led the ACWA Washington D.C. conference and clearly conveyed the impact of PFAS cleanup costs to OCWD, advocated for funding and an exemption from CERCLA liability, among other topics
- January 25 Staff of U.S. Senator Laphonza Butler, Chesna Foord, toured the GWRS and was briefed by Alicia Harasty

UPCOMING ACTIVITIES

In May, OCWD Board President Cathy Green, General Manager John Kennedy and staff will visit Washington D.C. to advocate for OCWD federal priorities and funding requests.



TO: Alicia Dunkin
FROM: Eric Sapirstein
DATE: April 22, 2024
SUBJECT: Washington Update

Congressional activities remained limited over the past month as Congress and the White House debated foreign aid and border policies. Given this focus, legislative activities of interest to OCWD centered on a number of bills introduced and that are detailed in the accompanying updated legislative matrix. The Executive Branch made important decisions related to PFAS that OCWD has tracked and advocated upon during the past several months. The following summarizes these activities.

- ***PFAS Drinking Water Standard***

On April 10, USEPA's Office of Water formally issued the 4PPT national drinking water standard that community water systems must comply with. Under the final rule, water agencies will be required to test for PFAS in the water supply and evaluate the amount of PFAS relative to the 4PPT Maximum Contaminant Level (MCL) over three years. If the agency determines PFAS levels exceed the MCL, the agency would have up to two additional years to comply with the MCL.

Impact to OCWD

The final rule's impact upon OCWD will likely be minimal given the current knowledge of PFAS contamination of its groundwater basin. OCWD's producers will be required to monitor and subsequently meet applicable treatment mandates. However, it is highly probable that legal challenges to the final MCL of 4PPT will be initiated. If this occurs, it is possible that a delay of the rule's effective date could be issued until questions surrounding the underlying science relied upon to set the 4PPT level are resolved.

- ***CERCLA PFAS Designation as Hazardous Substance and Enforcement Guidance***

On April 19, USEPA finalized its rule to designate PFAS chemicals as hazardous substances under CERCLA. The rule and related background information was

transmitted to OCWD staff earlier. As issued, the rule becomes effective sixty days after it is published in the Federal Register. It is likely to be published within the next five days. Once effective, USEPA will have the authority to leverage CERCLA's liability provisions to pursue "potentially responsible" parties (PRP) to clean-up a site and pay any natural resources damages.

USEPA also issued its long awaited policy on enforcement discretion as it implements the designation rule. Under the policy, USEPA states it would not pursue specifically identified entities for clean-up contributions. The policy is based upon the fact that such entities did not manufacture or use PFAS, but simply received the chemicals in course of carrying out responsibilities to deliver a service. The policy identifies public water and wastewater agencies among others. The guidance is not binding, and the agency notes it could change subject to new information.

The agency guidance clarifies two important points with the implementation of its discretionary authority. First, and most important, the agency agrees with OCWD's position that a decision not to pursue an entity would not insulate the entity from liability assertions from a PRP not party to a settlement agreement. Second, the agency acknowledges that an entity, like a water agency, might need to enter into a settlement agreement with USEPA to ensure an unquestionable shield from liability. The agency acknowledges by entering into an agreement, the water agency would effectively become a PRP and could expose itself to liability from any group not part of a settlement.

Impact to OCWD

Overall, the impact to OCWD related to the MCL will be limited because OCWD has ongoing monitoring and testing of its groundwater supply. With regard to liability impacts, there are two perspectives. First, USEPA's guidance on enforcement discretion should eliminate concern that the agency might attempt to pursue an agency like OCWD. At the same time, because the enforcement guidance is not binding, it could lead to increased disposal costs for water treatment residuals, for example, as disposal operations either increase the costs of disposal or reject acceptance of such residuals due to prospective liability concerns.

PFAS Passive Receivers Liability Exemption

Congressional efforts to develop a legislative exemption for PFAS passive receivers continued in both the House and the Senate. This effort has become increasingly important due the designation of PFAS as a hazardous substance. In the Senate, Democrat Committee on Environment and Public Works staff continue to work on an exemption from CERCLA liability. Meanwhile, Committee Republicans continue to insist that any PFAS legislation must provide for passive receivers liability protections if the committee is to address research and technology development funding needs and other PFAS research priorities.

In the House, legislation was introduced that mirrors Senator Cynthia Lummis' (R-WY) PFAS liability protection legislation for the water sector and contractors that carry out services for the sector. The bill, H.R. 7944, was introduced on a bipartisan basis by Representatives John Curtis (R-UT) and Maria Perez Gluskamp (D-WA). The legislation marks the first time, during this Congress, that a House PFAS liability protection bill has been introduced.

Importance to OCWD

The ongoing efforts to address passive receivers liability may have increased with USEPA's decision to designate the chemical under CERCLA. For OCWD, this circumstance could enhance prospects of a compromise bill in the Senate with a passive receivers provision. USEPA's acknowledgement, in its enforcement guidance, that the water sector would not be subject to enforcement might signal to both the Senate and House that passage of a passive receivers liability exemption would be consistent with the agency's interpretations of potential liability. With a House bill introduced, OCWD's priority for liability protections now enjoys a vehicle to advocate on behalf of in the coming months. This is especially important should the Senate approve an exemption that would require House action.



Federal Policy Update -April 22, 2024

OCWD Federal Policy Update

A summary of key federal water and public health legislation pending before Congress

North America Policy

11 Bills, 0 Regulations, 0 Research Documents

US HR 8030

Title: To amend the Water Infrastructure Finance and Innovation Act of 2014 with respect to the total amount of Federal assistance for projects in States experiencing severe drought and projects in historically disadvantaged communities, and for other purposes.

Current Status: In House

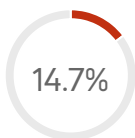
Introduction Date: 2024-04-16

Last Action Date: Referred to the Committee on Transportation and Infrastructure, and in addition to the Committee on Energy and Commerce, for a period to be subsequently determined by the Speaker, in each case for consideration of such provisions as fall within the jurisdiction of the committee concerned.. 2024-04-16

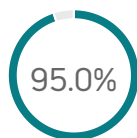
Summary: H.R. 8030 would increase the federal cost-share of from 80% to 90% for WIFIA funded projects addressing resilience or disadvantaged communities. Under the bill, WIFIA would still fund 49% percent of a project's costs, but of the remaining 51% of costs federal funds could be used to finance the project up to the 90% of the entire project's costs.

Location: United States

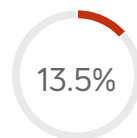
Floor Forecast Scores



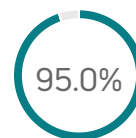
House
Pre-Floor Score



House
Floor Score



Senate
Pre-Floor Score



Senate
Floor Score

US HR 8032

Monitor

Title: To authorize the Low-Income Household Water Assistance Program, and for other purposes.

Current Status: In House

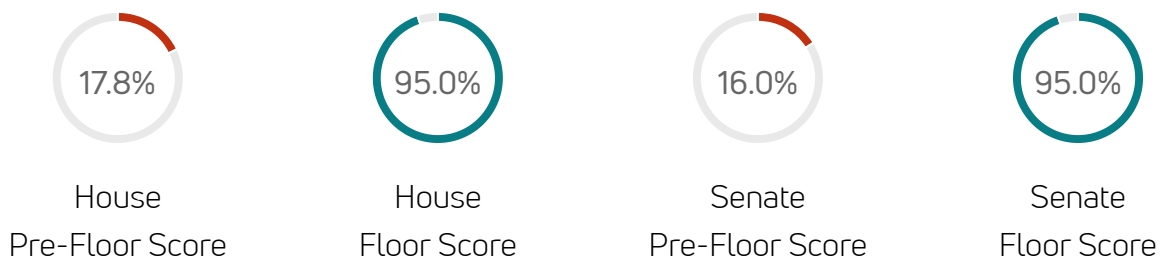
Introduction Date: 2024-04-16

Last Action Date: Referred to the Committee on Transportation and Infrastructure, and in addition to the Committee on Energy and Commerce, for a period to be subsequently determined by the Speaker, in each case for consideration of such provisions as fall within the jurisdiction of the committee concerned.. 2024-04-16

Summary: H.R. 8032 is the companion bill to S. 3830 that would create a permanent low income ratepayer assistance for water and wastewater services.

Location: United States

Floor Forecast Scores



US HR 7944

Monitor

Title: To exempt certain entities from liability under the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 with respect to releases of perfluoroalkyl and polyfluoroalkyl substances, and for other purposes.

Current Status: In House

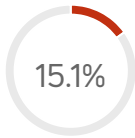
Introduction Date: 2024-04-11

Last Action Date: Referred to the Committee on Energy and Commerce, and in addition to the Committee on Transportation and Infrastructure, for a period to be subsequently determined by the Speaker, in each case for consideration of such provisions as fall within the jurisdiction of the committee concerned.. 2024-04-11

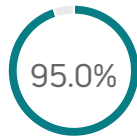
Summary: H.R. 7944 is a companion bill to S. 1430 sponsored by Senator Cynthia Lummis (R-WY). H.R. 7944 would protect water and wastewater agencies and related contractors from liability under CERCLA unless the threat stemmed from gross negligence.

Location: United States

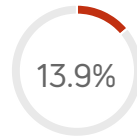
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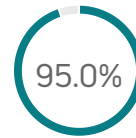
House
Pre-Floor Score



House
Floor Score



Senate
Pre-Floor Score



Senate
Floor Score

US S 3830

Title: Low-Income Household Water Assistance Program Establishment Act

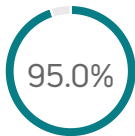
Current Status: In Senate

Introduction Date: 2024-02-28

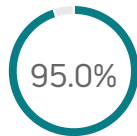
Last Action Date: Read twice and referred to the Committee on Health, Education, Labor, and Pensions. (Sponsor introductory remarks on measure: CR S1045-1046). 2024-02-28

Location: United States

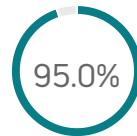
Floor Forecast Scores



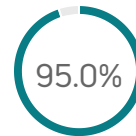
Senate
Pre-Floor Score



Senate
Floor Score



House
Pre-Floor Score



House
Floor Score

US HR 7194

Monitor

Title: PFAS Accountability Act of 2024

Current Status: In House

Introduction Date: 2024-02-01

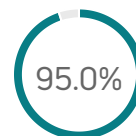
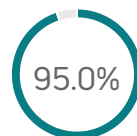
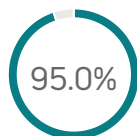
Last Action Date: Referred to the Subcommittee on Environment, Manufacturing, and Critical Materials.. 2024-02-02

Summary: H.R. 7194 would create a cause of action under the Toxics Substances Control Act to allow a citizen or class of citizens to litigate against a manufacturer of PFAS that improperly discharged PFAS into the environment and created a public health impact.

Companion legislation in the Senate: S. 3725. Sponsor: Rep. Madeline Dean (D-NH)

Location: United States

Floor Forecast Scores



House
Pre-Floor Score

House
Floor Score

Senate
Pre-Floor Score

Senate
Floor Score

US S 3725

👁 Monitor

Title: PFAS Accountability Act of 2024

Current Status: In Senate

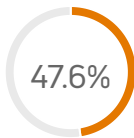
Introduction Date: 2024-02-01

Last Action Date: Read twice and referred to the Committee on Environment and Public Works.. 2024-02-01

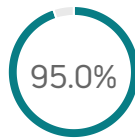
Summary: S. 3725 is the companion bill to H.R. 7194. It would establish a federal cause of action to allow citizens exposed to PFAS from a manufacturers improper discharge of PFAS to sue for damages including medical monitoring. Sponsor: Senator Kirsten Gillibrand D-NY

Location: United States

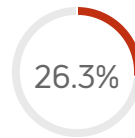
Floor Forecast Scores



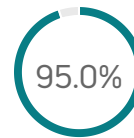
Senate
Pre-Floor Score



Senate
Floor Score



House
Pre-Floor Score



House
Floor Score

US HR 6805

👁 Monitor

Title: PFAS Action Act of 2023

Current Status: In House

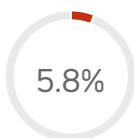
Introduction Date: 2023-12-14

Last Action Date: Referred to the Subcommittee on Water Resources and Environment.. 2024-01-02

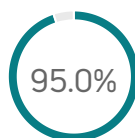
Summary: PFAS Action Act of 2023 is a reintroduction of the 2021 legislation. It would impose a statutory designation of PFAS as a hazardous substance under CERCLA. It would also impose other mandates including time specific drinking water standards for PFOA and PFOS and other members of the PFAS chemical family. It currently enjoys 21 sponsors, all Democratic. Sponsor: Rep. Debbie Dingell D-MI

Location: United States

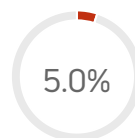
Floor Forecast Scores



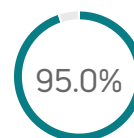
Senate
Pre-Floor Score



Senate
Floor Score



House
Pre-Floor Score



House
Floor Score

House
Pre-Floor Score

House
Floor Score

Senate
Pre-Floor Score

Senate
Floor Score

US HR 5664

Title: Water Infrastructure Finance and Innovation Act Amendments of 2023

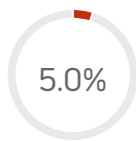
Current Status: In House

Introduction Date: 2023-09-21

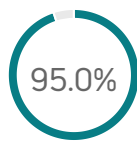
Last Action Date: Referred to the Subcommittee on Water Resources and Environment.. 2023-09-22

Location: United States

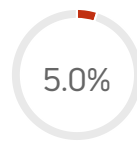
Floor Forecast Scores



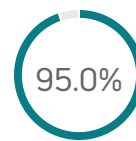
House
Pre-Floor Score



House
Floor Score



Senate
Pre-Floor Score



Senate
Floor Score

US S 2162

Monitor

Title: STREAM Act

Current Status: In Senate

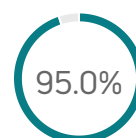
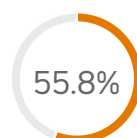
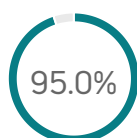
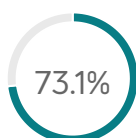
Introduction Date: 2023-06-22

Last Action Date: Committee on Energy and Natural Resources Subcommittee on Water and Power. Hearings held.. 2023-07-19

Summary: S. 2162 renews expiring provisions of the WIIN Act. It would increase funding authorizations for surface and groundwater storage projects, water recycling, desalination, and ecosystem restoration projects. Among the changes that would be authorized would be priorities for water supply projects that include enhanced public benefits (fisheries, wildlife and disadvantage communities drinking water reliability). It would also provide for enhanced water transfers to support temporary fallowing of agriculture lands to support wildlife habitats. (BILL PROVISIONS LIKELY TO INCORPORATED INTO LARGER WESTERN WATER LEGISLATION) No Sponsor at the writing

Location: United States

Floor Forecast Scores



Senate
Pre-Floor Score

Senate
Floor Score

House
Pre-Floor Score

House
Floor Score

US HR 3027

👁 Monitor

Title: Reclamation Climate Change and Water Program Reauthorization Act of 2023

Current Status: In House

Introduction Date: 2023-04-28

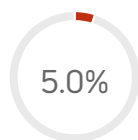
Last Action Date: Subcommittee Hearings Held. 2023-06-14

Summary: Would extend, through FY 2033, the U.S. Department of the Interior - Bureau of Reclamation Climate Change and Water Program, which expires at the end of FY 2023. The program requires the Bureau, in consultation with other federal agencies to deliver a report to Congress, every five years, on the impact of global climate change on the operations of the each major reclamation river basin. The report includes a mitigation and adaptation strategy and authorizes a feasibility study on impact of a strategy on "construction of any water supply, water management, environmental, or habitat enhancement water infrastructure." No direct funding is authorized for the program. Sponsor: Rep. Katie Porter D-CA

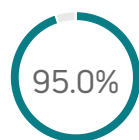
Description: Reclamation Climate Change and Water Program Reauthorization Act of 2023
This bill reauthorizes through FY2033 the Bureau of Reclamation's climate change and water program. Under the program, Reclamation assesses the effects of global climate change on the quantity of water resources in certain western states and develops strategies to address potential water shortages, conflicts, and other impacts to such water resources.

Location: United States

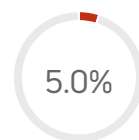
Floor Forecast Scores



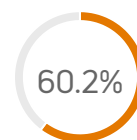
House
Pre-Floor Score



House
Floor Score



Senate
Pre-Floor Score



Senate
Floor Score

US S 1430

Title: Water Systems PFAS Liability Protection Act

Current Status: In Senate

Introduction Date: 2023-05-03

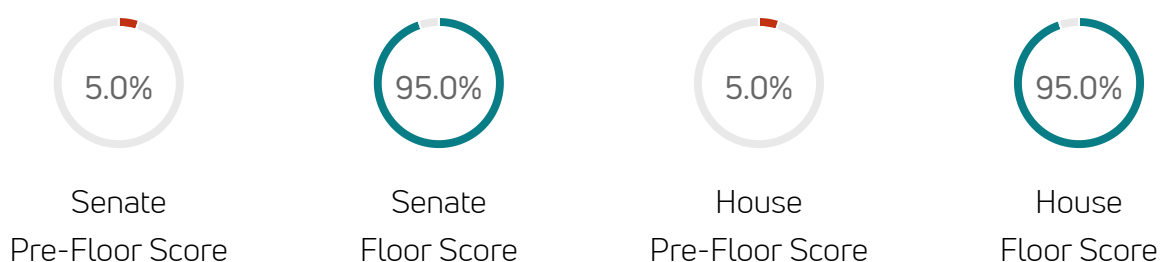
Last Action Date: Read twice and referred to the Committee on Environment and Public Works.. 2023-05-03

Summary: S. 1430 would provide a limited CERCLA liability (section 107) exemption for PFAS family of chemicals for water and wastewater agencies. S. 1430 would not exempt an agency from liability in cases of gross negligence.

Description: Water Systems PFAS Liability Protection Act This bill exempts specified water management entities from liability under the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA) for releases of certain perfluoroalkyl or polyfluoroalkyl substances, commonly referred to as PFAS. Specifically, the entities covered under the bill are public water systems, publicly or privately owned or operated treatment works, municipalities with a stormwater discharge permit, political subdivisions or special districts of a state that act as a wholesale water agency, and contractors performing the management or disposal activities for such entities. Under the bill, the exemption only applies if a specified entity transports, treats, disposes of, or arranges for the transport, treatment or disposal of PFAS consistent with applicable laws and during and following the conveyance or treatment of water under federal or state law, such as through the management or disposal of biosolids consistent with the Federal Water Pollution Control Act. Liability for damages or costs associated with the release of certain PFAS must not be precluded if an entity acted with gross negligence or willful misconduct.

Location: United States

Floor Forecast Scores



118TH CONGRESS
2D SESSION

H. R. 7944

To exempt certain entities from liability under the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 with respect to releases of perfluoroalkyl and polyfluoroalkyl substances, and for other purposes.

IN THE HOUSE OF REPRESENTATIVES

APRIL 11, 2024

Mr. CURTIS (for himself and Ms. PEREZ) introduced the following bill; which was referred to the Committee on Energy and Commerce, and in addition to the Committee on Transportation and Infrastructure, for a period to be subsequently determined by the Speaker, in each case for consideration of such provisions as fall within the jurisdiction of the committee concerned

A BILL

To exempt certain entities from liability under the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 with respect to releases of perfluoroalkyl and polyfluoroalkyl substances, and for other purposes.

1 *Be it enacted by the Senate and House of Representa-*
2 *tives of the United States of America in Congress assembled,*

3 **SECTION 1. SHORT TITLE.**

4 This Act may be cited as the “Water Systems PFAS
5 Liability Protection Act”.

1 **SEC. 2. EXEMPTION OF WATER AND WASTEWATER TREAT-**
2 **MENT FACILITIES FROM CERCLA LIABILITY**
3 **FOR RELEASES OF PFAS.**

4 (a) DEFINITIONS.—In this section:

5 (1) COVERED PERFLUOROALKYL OR
6 POLYFLUOROALKYL SUBSTANCE.—The term “cov-
7 ered perfluoroalkyl or polyfluoroalkyl substance”
8 means a non-polymeric perfluoroalkyl or
9 polyfluoroalkyl substance that contains at least 2 se-
10 quential fully fluorinated carbon atoms, excluding
11 gases and volatile liquids, that is a hazardous sub-
12 stance (as defined in section 101 of the Comprehen-
13 sive Environmental Response, Compensation, and
14 Liability Act of 1980 (42 U.S.C. 9601)).

15 (2) INDIAN TRIBE.—The term “Indian Tribe”
16 has the meaning given the term in section 4 of the
17 Indian Self-Determination and Education Assistance
18 Act (25 U.S.C. 5304).

19 (3) PROTECTED ENTITY.—The term “protected
20 entity” means—

21 (A) a public water system (as defined in
22 section 1401 of the Safe Drinking Water Act
23 (42 U.S.C. 300f));

24 (B) a publicly or privately owned or oper-
25 ated treatment works (as defined in section 212

1 of the Federal Water Pollution Control Act (33
2 U.S.C. 1292));

3 (C) a municipality to which a permit under
4 section 402 of the Federal Water Pollution
5 Control Act (33 U.S.C. 1342) is issued for
6 stormwater discharges;

7 (D) a political subdivision of a State or a
8 special district of a State acting as a wholesale
9 water agency; and

10 (E) a contractor performing the manage-
11 ment or disposal activities described in sub-
12 section (c) for an entity described in any of sub-
13 paragraphs (A) through (D).

14 (b) EXEMPTION.—Subject to subsection (c), no per-
15 son (including the United States, any State, or an Indian
16 Tribe) may recover costs or damages from a protected en-
17 tity under the Comprehensive Environmental Response,
18 Compensation, and Liability Act of 1980 (42 U.S.C. 9601
19 et seq.) for costs arising from a release to the environment
20 of a covered perfluoroalkyl or polyfluoroalkyl substance.

21 (c) REQUIREMENTS.—Subsection (b) shall only apply
22 if a protected entity transports, treats, disposes of, or ar-
23 ranges for the transport, treatment, or disposal of a cov-
24 ered perfluoroalkyl or polyfluoroalkyl substance—

1 (1) in a manner consistent with all applicable
2 laws at the time the activity is carried out; and

3 (2) during and following the conveyance or
4 treatment of water under Federal or State law, in-
5 cluding through—

6 (A) the management or disposal of bio-
7 solids consistent with section 405 of the Fed-
8 eral Water Pollution Control Act (33 U.S.C.
9 1345);

10 (B) the discharge of effluent in accordance
11 with a permit issued under section 402 of the
12 Federal Water Pollution Control Act (33 U.S.C.
13 1342);

14 (C) the release or disposal of water treat-
15 ment residuals or any other byproduct of drink-
16 ing water or wastewater treatment activities,
17 such as granulated activated carbon, filter
18 media, and processed waste streams; or

19 (D) the conveyance or storage of water for
20 the purpose of conserving or reclaiming the
21 water for water supply.

22 (d) SAVINGS PROVISION.—Nothing in this section
23 precludes liability for damages or costs associated with the
24 release of a covered perfluoroalkyl or polyfluoroalkyl sub-
25 stance by a protected entity if that protected entity acted

- 1 with gross negligence or willful misconduct in the dis-
- 2 charge, disposal, management, conveyance, or storage of
- 3 the covered perfluoroalkyl or polyfluoroalkyl substance.

○

AGENDA ITEM SUBMITTAL

Meeting Date: May 2, 2024

To: Communications/Leg. Liaison Cte.
Board of Directors

From: John Kennedy

Staff Contact: G. Ayala/C. Nettles

Budgeted: Yes

Budgeted Amount: \$100,000

Cost Estimate: \$100,000

Funding Source: 1012.51119

Program/Line Item No.: 9959

General Counsel Approval: N/A

Engineers/Feasibility Report: N/A

CEQA Compliance: N/A

Subject: WATER SUMMIT UPDATE

SUMMARY

Planning continues for the 2024 OC Water Summit. Staff will provide a verbal update of the event.

RECOMMENDATION

Informational

DISCUSSION/ANALYSIS

The OC Water Summit is an annual water supply conference co-hosted by the Orange County Water District (OCWD) and Municipal Water District of Orange County (MWDOC). OCWD and MWDOC trade off leading planning efforts each year. MWDOC is leading planning of the 2024 event.

The 16th annual Summit takes place Friday, September 27, 2024, at the Westin South Coast Plaza. Comedian and former NBC weatherman Fritz Coleman will return as master of ceremonies. Registration will open in July.

The Summit planning committee meets monthly, with the most recent meeting scheduled for April 29. Staff will provide a verbal recap of the meeting and event planning.

AGENDA ITEM SUBMITTAL

Meeting Date: May 2, 2024

To: Communications/Leg. Liaison Cte.
Board of Directors

From: John Kennedy

Staff Contact: G. Ayala/C. Nettles

Budgeted: N/A

Budgeted Amount: N/A

Cost Estimate: N/A

Funding Source: N/A

Program/Line Item No.: N/A

General Counsel Approval: N/A

Engineers/Feasibility Report: N/A

CEQA Compliance: N/A

Subject: PUBLIC AFFAIRS OUTREACH REPORT (APRIL 2024)

SUMMARY

Outreach for the Orange County Water District (OCWD; the District) and its programs and projects continue in an in-person and virtual format.

Attachment: April 2024 Media Clips Report

RECOMMENDATION

Informational

DISCUSSION/ANALYSIS

Tours

Three hundred thirty people attended GWRS tours in April.

April GWRS tours:

- April 1 – Cal State University of Sacramento student
- April 2 – Hoffy Tours
- April 3 – Cal State University of Long Beach Nursing
- April 5 – Public Virtual Tour
- April 8 – Golden West College
- April 8 – Hazen & Sawyer
- April 9 – Cal State University of Fullerton Nursing
- April 11 – Cal State University of Fullerton Nursing
- April 11 - MWA Architects
- April 11 – United Kingdom Researchers Contingency
- April 12 – Public In-Person Tour
- April 12 – UCI Student Exchange Program
- April 17 – ACWA Regional Affairs Representative
- April 18 – Young Presidents Organization

- April 18 – Cal State University Academics
- April 23 – Cal State University of Long Beach Nursing
- April 24 – Cypress College
- April 26 – Taco Bell Sustainability Group
- April 26 – Servite High School
- April 27 – Public In-Person Tour
- April 30 – California Senator Candidate Steve Garvey

Other April tours:

- April 27 - Prado Wetlands – Pomona Valley Audubon Society

Upcoming tours:

- May 1 – Cal State University of Long Beach Nursing
- May 3 – Public Virtual Tour
- May 6 – Orange County Health Agency
- May 9 – Godinez High School
- May 10 – Orange Coast College
- May 14 – City of Wonju, S. Korea
- May 16 – Reno Delegation
- May 17 – UCI Nursing
- May 20 – Golden State Water Company Board of Directors
- May 21 – Water Emergency Response of Orange County (WEROC)
- May 31 – AIMS Academy

A 30-minute [on-demand technical virtual tour](#) is available on the District’s social media channels. The tour, in all forms, has been viewed more than 9,200 times. A 10-minute [on-demand general virtual tour](#) has been viewed more than 4,600 times. A virtual tour of OCWD’s surface recharge operations has garnered more than 400 views.

Speakers Bureau/Media

As part of OCWD’s standard to forge and maintain long-term, positive, and proactive relationships with members of the community and to be transparent about its operations and programs, OCWD Board members and staff participate, regularly, at conferences and events and speak before civic groups.

April Speakers Bureau:

- April 4 – President Cathy Green, Director Denis Bilodeau and General Manager John Kennedy provided an overview of OCWD during the Santiago Creek Community Meeting.
- April 10 – Executive Director of Operations Mehul Patel was a panelist at the Public Works Summit, where he spoke about the GWRS, PFAS and managing the groundwater basin.
- April 15 – Director of Research Megan Plumlee spoke on a panel about emerging contaminant treatment at the Global Water Summit.

- April 15 – General Manager John Kennedy provided an OCWD briefing to the Los Alamitos city council.
- April 18 – Director of Recharge and Wetland Operations Ben Smith presented on recharge and recent rain to the Balboa Newport Rotary Club.
- April 20 – Communications Specialist Rose Wilke and Public Affairs Intern Angel An hosted an OCWD information table at the city of Westminster’s Earth Day event.
- April 24 – Executive Director of Planning and Natural Resources Lisa Haney was the keynote speaker at the Sustainable Water Summit where she spoke about OCWD’s work capturing rainfall and improving water storage.
- April 25 - Executive Director of Planning and Natural Resources Lisa Haney presented on Prado operations during the Water Affiliates Group roundtable at Scripps.

Upcoming Speakers Bureau:

- Association of Metropolitan Water agencies webinar on PFAS
- El Modena AP Environmental Science class
- Watermark Associates
- Orange County Sanitation District Open House
- OC Green Expo hosted by Anaheim Public Utilities
- American Water Works Association ACE24 Conference

Media Clips

In April, there were 211 global news hits for OCWD, the GWRS and other District programs and projects with a total reach of 728.9 million. The media clip report for April (as of April 23) is attached.

Social Media

The District engages 17,843 followers on its social media channels. Below are statistics for OCWD’s social media for April (as of April 22).

OCWD’s X (formally Twitter) page

- Followers: 5,511
- Posts: 19
- Post impressions: 1,420

OCWD’s Facebook

- Followers: 1,735
- Posts: 5
- Engagement: 76
- Post impressions: 5,810

OCWD’s LinkedIn

- Followers: 7,901
- Posts: 7
- Engagement: 248
- Post impressions: 13,063

OCWD's Instagram

- Followers: 1,864
- Posts/Reels: 8
- Stories 46
- Engagement: 214
- Post impressions: 5,844

OCWD's TikTok

- Followers: 31
- Videos: 1
- Views: 232

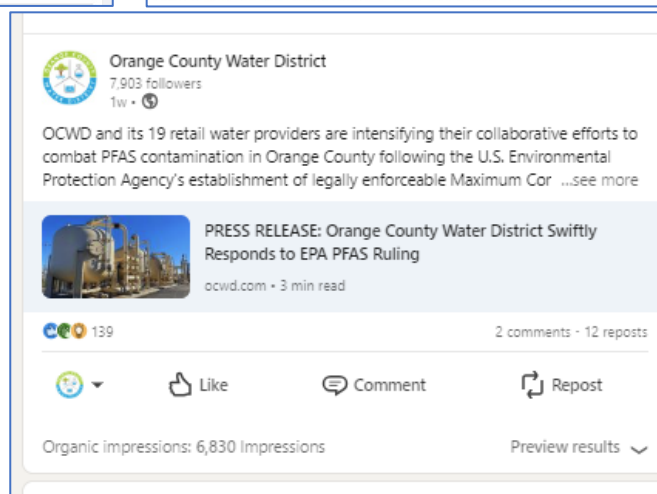
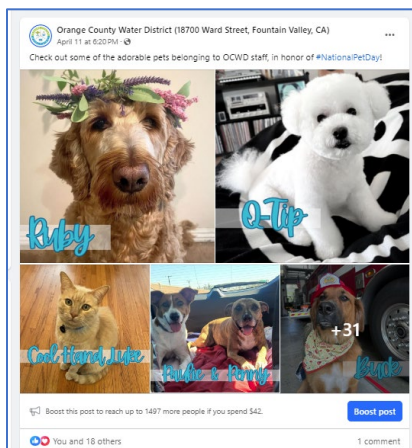
OCWD's Threads

- Followers: 229

OCWD's YouTube

- Subscribers: 572
- Views: 1,200
- Hours watched: 106

A sampling of top performing social media posts:



Website Analytics

Below are April analytics for OCWD's website (as of April 22).

- Users: 6,111
- Page views: 16,121
- Top five pages:
 - Home
 - GWRS
 - Careers
 - About
 - Meeting Agendas and Minutes

Staff continues working to refresh the District's website including the homepage. The revamp comes after last year's IS-supported transfer to Word Press to build and maintain the website. Word Press provides much more functionality on the backend than the previous CMS. Staff reviewed website analytics to determine the most viewed and searched pages so the website could offer the best user experience. Staff continues to meet regularly to finetune the site.

Electronic Publications

Staff wrote and distributed the April issue of Hydrospectives, OCWD's monthly e-newsletter.

Staff wrote and distributed two press releases:

- [Orange County Water District Swiftly Responds to EPA PFAS Ruling](#)
- [Celebrating Earth Day: Pair Of Bald Eagles In The Prado Wetlands Named, Family Introduced](#)

Staff distributed the spring 2024 PFAS quarterly update.

Staff distributed the North and South Basin quarterly update. The update was also translated into Spanish and Vietnamese.

Awards

The GWRS dedication event was selected to receive an EPIC award from the California Association of Public Information Officers (CAPIO).

**OCWD BRAND
MEDIA CLIPS
APRIL 2024**

	Date	Media Outlet	Title	Country	Link	Total Readership
1	4/23/2024	KFI AM	Radio clip from KFI AM - Apr 23, 2024	United States	https://app2.cision.com/#/articles/150001861612153	417,100
2	4/23/2024	KTLA	Meet Lucy and Ricky - Riverside County eagle pair receive formal names	United States	https://ktla.com/news/california/meet-lucy-and-ricky-riverside-county-eagle-pair-receive-formal-names/	7,073,653
3	4/23/2024	Yahoo	Meet Lucy and Ricky - Riverside County eagle pair receive formal names	United States	https://www.yahoo.com/lifestyle/meet-lucy-ricky-riverside-county-010830727.html	427,922,376
4	4/23/2024	KABC-LA (ABC)	Eyewitness News 4AM	United States	https://app2.cision.com/#/articles/150001861514043	21,409
5	4/19/2024	Foothills Sentry	Groundwater replenishment system named "Community Champion"	United States	https://foothillssentry.com/story-archives-1/f/groundwater-replenishment-system-named-%E2%80%9Ccommunity-champion%E2%80%9D	890
6	4/19/2024	METRO - NEWS CHANNEL NEBRASKA	YLWD Dedicates its PFAS Water Treatment Plant to Highlight Dr. J. Wayne Miller's Contributions	United States	https://metro.newschannelnebraska.com/story/50687963/ylwd-dedicates-its-pfas-water-treatment-plant-to-highlight-dr-j-wayne-millers-contributions	16,908
7	4/19/2024	JD Supra	PFAS Safe Drinking Water Act Maximum Contaminant Levels Set	United States	https://www.jdsupra.com/legalnews/pfas-safe-drinking-water-act-maximum-5219764	514,473
8	4/19/2024	The Associated Press	YLWD Dedicates its PFAS Water Treatment Plant to Highlight Dr. J. Wayne Miller's Contributions	United States	https://apnews.com/press-release/ein-presswire-newsmatics/utilities-5b67575e832ee31d71bbf8d671057515	42,838,301
9	4/19/2024	WMBD-TV	YLWD Dedicates its PFAS Water Treatment Plant to Highlight Dr. J. Wayne Miller's Contributions	United States	https://www.centralillinoisproud.com/business/press-releases/ein-presswire/704755067/ylwd-dedicates-its-pfas-water-treatment-plant-to-highlight-dr-j-wayne-millers-contributions	222,103

**OCWD BRAND
MEDIA CLIPS
APRIL 2024**

	Date	Media Outlet	Title	Country	Link	Total Readership
10	4/19/2024	WCIA 3	YLWD Dedicates its PFAS Water Treatment Plant to Highlight Dr. J. Wayne Miller's Contributions	United States	https://www.wcia.com/business/press-releases/ein-presswire/704755067/ylwd-dedicates-its-pfas-water-treatment-plant-to-highlight-dr-j-wayne-millers-contributions	246,018
11	4/19/2024	NBC4 WCMH-TV	YLWD Dedicates its PFAS Water Treatment Plant to Highlight Dr. J. Wayne Miller's Contributions	United States	https://www.nbc4i.com/business/press-releases/ein-presswire/704755067/ylwd-dedicates-its-pfas-water-treatment-plant-to-highlight-dr-j-wayne-millers-contributions	1,404,208
12	4/19/2024	PAHomepage	YLWD Dedicates its PFAS Water Treatment Plant to Highlight Dr. J. Wayne Miller's Contributions	United States	https://www.pahomepage.com/business/press-releases/ein-presswire/704755067/ylwd-dedicates-its-pfas-water-treatment-plant-to-highlight-dr-j-wayne-millers-contributions	595,400
13	4/19/2024	FOX4 News Kansas City	YLWD Dedicates its PFAS Water Treatment Plant to Highlight Dr. J. Wayne Miller's Contributions	United States	https://fox4kc.com/business/press-releases/ein-presswire/704755067/ylwd-dedicates-its-pfas-water-treatment-plant-to-highlight-dr-j-wayne-millers-contributions	1,964,248
14	4/19/2024	KOIN 06	YLWD Dedicates its PFAS Water Treatment Plant to Highlight Dr. J. Wayne Miller's Contributions	United States	https://www.koin.com/business/press-releases/ein-presswire/704755067/ylwd-dedicates-its-pfas-water-treatment-plant-to-highlight-dr-j-wayne-millers-contributions	1,240,702

**OCWD BRAND
MEDIA CLIPS
APRIL 2024**

	Date	Media Outlet	Title	Country	Link	Total Readership
15	4/19/2024	Fox 59	YLWD Dedicates its PFAS Water Treatment Plant to Highlight Dr. J. Wayne Miller's Contributions	United States	https://fox59.com/business/press-releases/ein-presswire/704755067/ylwd-dedicates-its-pfas-water-treatment-plant-to-highlight-dr-j-wayne-millers-contributions	3,352,392
16	4/19/2024	KOLR10 Fox 4	YLWD Dedicates its PFAS Water Treatment Plant to Highlight Dr. J. Wayne Miller's Contributions	United States	https://www.ozarksfirst.com/business/press-releases/ein-presswire/704755067/ylwd-dedicates-its-pfas-water-treatment-plant-to-highlight-dr-j-wayne-millers-contributions	225,579
17	4/19/2024	WOOD TV8	YLWD Dedicates its PFAS Water Treatment Plant to Highlight Dr. J. Wayne Miller's Contributions	United States	https://www.woodtv.com/business/press-releases/ein-presswire/704755067/ylwd-dedicates-its-pfas-water-treatment-plant-to-highlight-dr-j-wayne-millers-contributions	1,167,002
18	4/19/2024	North America Today	YLWD Dedicates its PFAS Water Treatment Plant to Highlight Dr. J. Wayne Miller's Contributions	United States	https://www.northamericatoday.com/article/704755067-ylwd-dedicates-its-pfas-water-treatment-plant-to-highlight-dr-j-wayne-miller-s-contributions	656
19	4/19/2024	InformNNY.com	YLWD Dedicates its PFAS Water Treatment Plant to Highlight Dr. J. Wayne Miller's Contributions	United States	https://www.informnny.com/business/press-releases/ein-presswire/704755067/ylwd-dedicates-its-pfas-water-treatment-plant-to-highlight-dr-j-wayne-millers-contributions	40,556
20	4/19/2024	KTLA	YLWD Dedicates its PFAS Water Treatment Plant to Highlight Dr. J. Wayne Miller's Contributions	United States	https://ktla.com/business/press-releases/ein-presswire/704755067/ylwd-dedicates-its-pfas-water-treatment-plant-to-highlight-dr-j-wayne-millers-contributions	5,792,163

**OCWD BRAND
MEDIA CLIPS
APRIL 2024**

	Date	Media Outlet	Title	Country	Link	Total Readership
21	4/19/2024	WKBN 27 First News	YLWD Dedicates its PFAS Water Treatment Plant to Highlight Dr. J. Wayne Miller's Contributions	United States	https://www.wkbn.com/business/press-releases/ein-presswire/704755067/ylwd-dedicates-its-pfas-water-treatment-plant-to-highlight-dr-j-wayne-millers-contributions	827,803
22	4/19/2024	MyHighPlains.com	YLWD Dedicates its PFAS Water Treatment Plant to Highlight Dr. J. Wayne Miller's Contributions	United States	https://www.myhighplains.com/business/press-releases/ein-presswire/704755067/ylwd-dedicates-its-pfas-water-treatment-plant-to-highlight-dr-j-wayne-millers-contributions	130,350
23	4/19/2024	News 4 Buffalo	YLWD Dedicates its PFAS Water Treatment Plant to Highlight Dr. J. Wayne Miller's Contributions	United States	https://www.wivb.com/business/press-releases/ein-presswire/704755067/ylwd-dedicates-its-pfas-water-treatment-plant-to-highlight-dr-j-wayne-millers-contributions	563,699
24	4/19/2024	WFXR	YLWD Dedicates its PFAS Water Treatment Plant to Highlight Dr. J. Wayne Miller's Contributions	United States	https://www.wfxrtv.com/business/press-releases/ein-presswire/704755067/ylwd-dedicates-its-pfas-water-treatment-plant-to-highlight-dr-j-wayne-millers-contributions	193,143
25	4/19/2024	FOX31	YLWD Dedicates its PFAS Water Treatment Plant to Highlight Dr. J. Wayne Miller's Contributions	United States	https://kdvr.com/business/press-releases/ein-presswire/704755067/ylwd-dedicates-its-pfas-water-treatment-plant-to-highlight-dr-j-wayne-millers-contributions	2,115,608

**OCWD BRAND
MEDIA CLIPS
APRIL 2024**

	Date	Media Outlet	Title	Country	Link	Total Readership
26	4/19/2024	Baton Rouge News & Weather	YLWD Dedicates its PFAS Water Treatment Plant to Highlight Dr. J. Wayne Miller's Contributions	United States	https://www.brproud.com/business/press-releases/ein-presswire/704755067/ylwd-dedicates-its-pfas-water-treatment-plant-to-highlight-dr-j-wayne-millers-contributions	201,432
27	4/19/2024	WATE 6 On Your Side	YLWD Dedicates its PFAS Water Treatment Plant to Highlight Dr. J. Wayne Miller's Contributions	United States	https://www.wate.com/business/press-releases/ein-presswire/704755067/ylwd-dedicates-its-pfas-water-treatment-plant-to-highlight-dr-j-wayne-millers-contributions	772,148
28	4/19/2024	WYTV	YLWD Dedicates its PFAS Water Treatment Plant to Highlight Dr. J. Wayne Miller's Contributions	United States	https://www.wytv.com/business/press-releases/ein-presswire/704755067/ylwd-dedicates-its-pfas-water-treatment-plant-to-highlight-dr-j-wayne-millers-contributions	34,370
29	4/19/2024	KSNT.com	YLWD Dedicates its PFAS Water Treatment Plant to Highlight Dr. J. Wayne Miller's Contributions	United States	https://www.ksnt.com/business/press-releases/ein-presswire/704755067/ylwd-dedicates-its-pfas-water-treatment-plant-to-highlight-dr-j-wayne-millers-contributions	516,197
30	4/19/2024	MyChamplainValley.com	YLWD Dedicates its PFAS Water Treatment Plant to Highlight Dr. J. Wayne Miller's Contributions	United States	https://www.mychamplainvalley.com/business/press-releases/ein-presswire/704755067/ylwd-dedicates-its-pfas-water-treatment-plant-to-highlight-dr-j-wayne-millers-contributions	62,156

**OCWD BRAND
MEDIA CLIPS
APRIL 2024**

	Date	Media Outlet	Title	Country	Link	Total Readership
31	4/19/2024	ConchoValleyHomepage.com	YLWD Dedicates its PFAS Water Treatment Plant to Highlight Dr. J. Wayne Miller's Contributions	United States	https://www.conchovalleyhomepage.com/business/press-releases/ein-presswire/704755067/ylwd-dedicates-its-pfas-water-treatment-plant-to-highlight-dr-j-wayne-millers-contributions	117,621
32	4/19/2024	WTRF 7News	YLWD Dedicates its PFAS Water Treatment Plant to Highlight Dr. J. Wayne Miller's Contributions	United States	https://www.wtrf.com/business/press-releases/ein-presswire/704755067/ylwd-dedicates-its-pfas-water-treatment-plant-to-highlight-dr-j-wayne-millers-contributions	406,388
33	4/19/2024	CBS Rhode Island	YLWD Dedicates its PFAS Water Treatment Plant to Highlight Dr. J. Wayne Miller's Contributions	United States	https://www.wpri.com/business/press-releases/ein-presswire/704755067/ylwd-dedicates-its-pfas-water-treatment-plant-to-highlight-dr-j-wayne-millers-contributions	794,020
34	4/19/2024	FOX2548 & WIProud	YLWD Dedicates its PFAS Water Treatment Plant to Highlight Dr. J. Wayne Miller's Contributions	United States	https://www.wiproud.com/business/press-releases/ein-presswire/704755067/ylwd-dedicates-its-pfas-water-treatment-plant-to-highlight-dr-j-wayne-millers-contributions	13,875
35	4/19/2024	MyStateLine.com	YLWD Dedicates its PFAS Water Treatment Plant to Highlight Dr. J. Wayne Miller's Contributions	United States	https://www.mystateline.com/business/press-releases/ein-presswire/704755067/ylwd-dedicates-its-pfas-water-treatment-plant-to-highlight-dr-j-wayne-millers-contributions	301,671

**OCWD BRAND
MEDIA CLIPS
APRIL 2024**

	Date	Media Outlet	Title	Country	Link	Total Readership
36	4/19/2024	WJTV 12 News	YLWD Dedicates its PFAS Water Treatment Plant to Highlight Dr. J. Wayne Miller's Contributions	United States	https://www.wjtv.com/business/press-releases/ein-presswire/704755067/ylwd-dedicates-its-pfas-water-treatment-plant-to-highlight-dr-j-wayne-millers-contributions	498,579
37	4/19/2024	Fox 8 News	YLWD Dedicates its PFAS Water Treatment Plant to Highlight Dr. J. Wayne Miller's Contributions	United States	https://fox8.com/business/press-releases/ein-presswire/704755067/ylwd-dedicates-its-pfas-water-treatment-plant-to-highlight-dr-j-wayne-millers-contributions	2,539,733
38	4/19/2024	WSPA	YLWD Dedicates its PFAS Water Treatment Plant to Highlight Dr. J. Wayne Miller's Contributions	United States	https://www.wspa.com/business/press-releases/ein-presswire/704755067/ylwd-dedicates-its-pfas-water-treatment-plant-to-highlight-dr-j-wayne-millers-contributions	339,042
39	4/19/2024	YourCentralValley.com	YLWD Dedicates its PFAS Water Treatment Plant to Highlight Dr. J. Wayne Miller's Contributions	United States	https://www.yourcentralvalley.com/business/press-releases/ein-presswire/704755067/ylwd-dedicates-its-pfas-water-treatment-plant-to-highlight-dr-j-wayne-millers-contributions	215,236
40	4/19/2024	WTWO News	YLWD Dedicates its PFAS Water Treatment Plant to Highlight Dr. J. Wayne Miller's Contributions	United States	https://www.mywabashvalley.com/business/press-releases/ein-presswire/704755067/ylwd-dedicates-its-pfas-water-treatment-plant-to-highlight-dr-j-wayne-millers-contributions	98,276

**OCWD BRAND
MEDIA CLIPS
APRIL 2024**

	Date	Media Outlet	Title	Country	Link	Total Readership
41	4/19/2024	NewsChannel 9	YLWD Dedicates its PFAS Water Treatment Plant to Highlight Dr. J. Wayne Miller's Contributions	United States	https://www.localsyr.com/business/press-releases/ein-presswire/704755067/ylwd-dedicates-its-pfas-water-treatment-plant-to-highlight-dr-j-wayne-millers-contributions	438,087
42	4/19/2024	SiouxlandProud.com	YLWD Dedicates its PFAS Water Treatment Plant to Highlight Dr. J. Wayne Miller's Contributions	United States	https://www.siouxlandproud.com/business/press-releases/ein-presswire/704755067/ylwd-dedicates-its-pfas-water-treatment-plant-to-highlight-dr-j-wayne-millers-contributions	85,131
43	4/19/2024	WOWK 13 News	YLWD Dedicates its PFAS Water Treatment Plant to Highlight Dr. J. Wayne Miller's Contributions	United States	https://www.wowktv.com/business/press-releases/ein-presswire/704755067/ylwd-dedicates-its-pfas-water-treatment-plant-to-highlight-dr-j-wayne-millers-contributions	196,433
44	4/19/2024	myPANHANDLE.com	YLWD Dedicates its PFAS Water Treatment Plant to Highlight Dr. J. Wayne Miller's Contributions	United States	https://www.mypanhandle.com/business/press-releases/ein-presswire/704755067/ylwd-dedicates-its-pfas-water-treatment-plant-to-highlight-dr-j-wayne-millers-contributions	262,856
45	4/19/2024	CALIFORNIA COMMERCE DAILY	YLWD Dedicates its PFAS Water Treatment Plant to Highlight Dr. J. Wayne Miller's Contributions	United States	https://www.californiacommercedaily.com/article/704755067-ylwd-dedicates-its-pfas-water-treatment-plant-to-highlight-dr-j-wayne-miller-s-contributions	670
46	4/19/2024	WTAJ-TV	YLWD Dedicates its PFAS Water Treatment Plant to Highlight Dr. J. Wayne Miller's Contributions	United States	https://www.wtaj.com/business/press-releases/ein-presswire/704755067/ylwd-dedicates-its-pfas-water-treatment-plant-to-highlight-dr-j-wayne-millers-contributions	354,845

**OCWD BRAND
MEDIA CLIPS
APRIL 2024**

	Date	Media Outlet	Title	Country	Link	Total Readership
47	4/19/2024	WETM-TV	YLWD Dedicates its PFAS Water Treatment Plant to Highlight Dr. J. Wayne Miller's Contributions	United States	https://www.mytwintiers.com/business/press-releases/ein-presswire/704755067/ylwd-dedicates-its-pfas-water-treatment-plant-to-highlight-dr-j-wayne-millers-contributions	193,224
48	4/19/2024	8NewsNow.com	YLWD Dedicates its PFAS Water Treatment Plant to Highlight Dr. J. Wayne Miller's Contributions	United States	https://www.8newsnow.com/business/press-releases/ein-presswire/704755067/ylwd-dedicates-its-pfas-water-treatment-plant-to-highlight-dr-j-wayne-millers-contributions	1,857,273
49	4/19/2024	WKRG	YLWD Dedicates its PFAS Water Treatment Plant to Highlight Dr. J. Wayne Miller's Contributions	United States	https://www.wkrg.com/business/press-releases/ein-presswire/704755067/ylwd-dedicates-its-pfas-water-treatment-plant-to-highlight-dr-j-wayne-millers-contributions	440,524
50	4/19/2024	WJBF NewsChannel 6	YLWD Dedicates its PFAS Water Treatment Plant to Highlight Dr. J. Wayne Miller's Contributions	United States	https://www.wjbf.com/business/press-releases/ein-presswire/704755067/ylwd-dedicates-its-pfas-water-treatment-plant-to-highlight-dr-j-wayne-millers-contributions	202,531
51	4/19/2024	PHL17	YLWD Dedicates its PFAS Water Treatment Plant to Highlight Dr. J. Wayne Miller's Contributions	United States	https://phl17.com/business/press-releases/ein-presswire/704755067/ylwd-dedicates-its-pfas-water-treatment-plant-to-highlight-dr-j-wayne-millers-contributions	21,730

**OCWD BRAND
MEDIA CLIPS
APRIL 2024**

	Date	Media Outlet	Title	Country	Link	Total Readership
52	4/19/2024	WWLP-22News	YLWD Dedicates its PFAS Water Treatment Plant to Highlight Dr. J. Wayne Miller's Contributions	United States	https://www.wwlp.com/business/press-releases/ein-presswire/704755067/ylwd-dedicates-its-pfas-water-treatment-plant-to-highlight-dr-j-wayne-millers-contributions	733,307
53	4/19/2024	NEWS10 ABC	YLWD Dedicates its PFAS Water Treatment Plant to Highlight Dr. J. Wayne Miller's Contributions	United States	https://www.news10.com/business/press-releases/ein-presswire/704755067/ylwd-dedicates-its-pfas-water-treatment-plant-to-highlight-dr-j-wayne-millers-contributions	518,636
54	4/19/2024	EIN Presswire	YLWD Dedicates its PFAS Water Treatment Plant to Highlight Dr. J. Wayne Miller's Contributions	United States	https://www.einpresswire.com/article/704755067/ylwd-dedicates-its-pfas-water-treatment-plant-to-highlight-dr-j-wayne-miller-s-contributions	239,626
55	4/19/2024	UPMatters.com: WJMN	YLWD Dedicates its PFAS Water Treatment Plant to Highlight Dr. J. Wayne Miller's Contributions	United States	https://www.upmatters.com/business/press-releases/ein-presswire/704755067/ylwd-dedicates-its-pfas-water-treatment-plant-to-highlight-dr-j-wayne-millers-contributions	40,554
56	4/19/2024	KSN	YLWD Dedicates its PFAS Water Treatment Plant to Highlight Dr. J. Wayne Miller's Contributions	United States	https://www.ksn.com/business/press-releases/ein-presswire/704755067/ylwd-dedicates-its-pfas-water-treatment-plant-to-highlight-dr-j-wayne-millers-contributions	604,896
57	4/19/2024	CBS4 Indy	YLWD Dedicates its PFAS Water Treatment Plant to Highlight Dr. J. Wayne Miller's Contributions	United States	https://cbs4indy.com/business/press-releases/ein-presswire/704755067/ylwd-dedicates-its-pfas-water-treatment-plant-to-highlight-dr-j-wayne-millers-contributions	115,753

**OCWD BRAND
MEDIA CLIPS
APRIL 2024**

	Date	Media Outlet	Title	Country	Link	Total Readership
58	4/19/2024	Utica News & Weather	YLWD Dedicates its PFAS Water Treatment Plant to Highlight Dr. J. Wayne Miller's Contributions	United States	https://www.cnyhomepage.com/business/press-releases/ein-presswire/704755067/ylwd-dedicates-its-pfas-water-treatment-plant-to-highlight-dr-j-wayne-millers-contributions	20,343
59	4/19/2024	KLFY	YLWD Dedicates its PFAS Water Treatment Plant to Highlight Dr. J. Wayne Miller's Contributions	United States	https://www.klfy.com/business/press-releases/ein-presswire/704755067/ylwd-dedicates-its-pfas-water-treatment-plant-to-highlight-dr-j-wayne-millers-contributions	257,034
60	4/19/2024	WNTZ FOX 48	YLWD Dedicates its PFAS Water Treatment Plant to Highlight Dr. J. Wayne Miller's Contributions	United States	https://www.cenlanow.com/business/press-releases/ein-presswire/704755067/ylwd-dedicates-its-pfas-water-treatment-plant-to-highlight-dr-j-wayne-millers-contributions	12,768
61	4/19/2024	WHNT News 19	YLWD Dedicates its PFAS Water Treatment Plant to Highlight Dr. J. Wayne Miller's Contributions	United States	https://whnt.com/business/press-releases/ein-presswire/704755067/ylwd-dedicates-its-pfas-water-treatment-plant-to-highlight-dr-j-wayne-millers-contributions	499,355
62	4/19/2024	FOX 5 San Diego	YLWD Dedicates its PFAS Water Treatment Plant to Highlight Dr. J. Wayne Miller's Contributions	United States	https://fox5sandiego.com/business/press-releases/ein-presswire/704755067/ylwd-dedicates-its-pfas-water-treatment-plant-to-highlight-dr-j-wayne-millers-contributions	1,483,456

**OCWD BRAND
MEDIA CLIPS
APRIL 2024**

	Date	Media Outlet	Title	Country	Link	Total Readership
63	4/19/2024	myfox8.com	YLWD Dedicates its PFAS Water Treatment Plant to Highlight Dr. J. Wayne Miller's Contributions	United States	https://myfox8.com/business/press-releases/ein-presswire/704755067/ylwd-dedicates-its-pfas-water-treatment-plant-to-highlight-dr-j-wayne-millers-contributions	1,305,538
64	4/19/2024	WDTN-TV	YLWD Dedicates its PFAS Water Treatment Plant to Highlight Dr. J. Wayne Miller's Contributions	United States	https://www.wdtn.com/business/press-releases/ein-presswire/704755067/ylwd-dedicates-its-pfas-water-treatment-plant-to-highlight-dr-j-wayne-millers-contributions	711,489
65	4/19/2024	WDHN	YLWD Dedicates its PFAS Water Treatment Plant to Highlight Dr. J. Wayne Miller's Contributions	United States	https://www.wdhn.com/business/press-releases/ein-presswire/704755067/ylwd-dedicates-its-pfas-water-treatment-plant-to-highlight-dr-j-wayne-millers-contributions	115,746
66	4/19/2024	KARK	YLWD Dedicates its PFAS Water Treatment Plant to Highlight Dr. J. Wayne Miller's Contributions	United States	https://www.kark.com/business/press-releases/ein-presswire/704755067/ylwd-dedicates-its-pfas-water-treatment-plant-to-highlight-dr-j-wayne-millers-contributions	450,356
67	4/19/2024	WRBL	YLWD Dedicates its PFAS Water Treatment Plant to Highlight Dr. J. Wayne Miller's Contributions	United States	https://www.wrbl.com/business/press-releases/ein-presswire/704755067/ylwd-dedicates-its-pfas-water-treatment-plant-to-highlight-dr-j-wayne-millers-contributions	146,016

**OCWD BRAND
MEDIA CLIPS
APRIL 2024**

	Date	Media Outlet	Title	Country	Link	Total Readership
68	4/19/2024	Your Basin	YLWD Dedicates its PFAS Water Treatment Plant to Highlight Dr. J. Wayne Miller's Contributions	United States	https://www.yourbasin.com/business/press-releases/ein-presswire/704755067/ylwd-dedicates-its-pfas-water-treatment-plant-to-highlight-dr-j-wayne-millers-contributions	63,555
69	4/19/2024	WKRN	YLWD Dedicates its PFAS Water Treatment Plant to Highlight Dr. J. Wayne Miller's Contributions	United States	https://www.wkrn.com/business/press-releases/ein-presswire/704755067/ylwd-dedicates-its-pfas-water-treatment-plant-to-highlight-dr-j-wayne-millers-contributions	2,003,549
70	4/19/2024	KSN 16	YLWD Dedicates its PFAS Water Treatment Plant to Highlight Dr. J. Wayne Miller's Contributions	United States	https://www.fourstateshomepage.com/business/press-releases/ein-presswire/704755067/ylwd-dedicates-its-pfas-water-treatment-plant-to-highlight-dr-j-wayne-millers-contributions	118,838
71	4/19/2024	ValleyCentral.com	YLWD Dedicates its PFAS Water Treatment Plant to Highlight Dr. J. Wayne Miller's Contributions	United States	https://www.valleycentral.com/business/press-releases/ein-presswire/704755067/ylwd-dedicates-its-pfas-water-treatment-plant-to-highlight-dr-j-wayne-millers-contributions	278,191
72	4/19/2024	Count on 2	YLWD Dedicates its PFAS Water Treatment Plant to Highlight Dr. J. Wayne Miller's Contributions	United States	https://www.counton2.com/business/press-releases/ein-presswire/704755067/ylwd-dedicates-its-pfas-water-treatment-plant-to-highlight-dr-j-wayne-millers-contributions	225,172

**OCWD BRAND
MEDIA CLIPS
APRIL 2024**

	Date	Media Outlet	Title	Country	Link	Total Readership
73	4/19/2024	Eyewitness News WEHT WTVW	YLWD Dedicates its PFAS Water Treatment Plant to Highlight Dr. J. Wayne Miller's Contributions	United States	https://www.tristatehomepage.com/business/press-releases/ein-presswire/704755067/ylwd-dedicates-its-pfas-water-treatment-plant-to-highlight-dr-j-wayne-millers-contributions	240,192
74	4/19/2024	WGN9	YLWD Dedicates its PFAS Water Treatment Plant to Highlight Dr. J. Wayne Miller's Contributions	United States	https://wgntv.com/business/press-releases/ein-presswire/704755067/ylwd-dedicates-its-pfas-water-treatment-plant-to-highlight-dr-j-wayne-millers-contributions	2,001,368
75	4/19/2024	KHON2	YLWD Dedicates its PFAS Water Treatment Plant to Highlight Dr. J. Wayne Miller's Contributions	United States	https://www.khon2.com/business/press-releases/ein-presswire/704755067/ylwd-dedicates-its-pfas-water-treatment-plant-to-highlight-dr-j-wayne-millers-contributions	650,123
76	4/19/2024	WGNO	YLWD Dedicates its PFAS Water Treatment Plant to Highlight Dr. J. Wayne Miller's Contributions	United States	https://wgno.com/business/press-releases/ein-presswire/704755067/ylwd-dedicates-its-pfas-water-treatment-plant-to-highlight-dr-j-wayne-millers-contributions	139,953
77	4/19/2024	ABC 27	YLWD Dedicates its PFAS Water Treatment Plant to Highlight Dr. J. Wayne Miller's Contributions	United States	https://www.abc27.com/business/press-releases/ein-presswire/704755067/ylwd-dedicates-its-pfas-water-treatment-plant-to-highlight-dr-j-wayne-millers-contributions	1,867,026

**OCWD BRAND
MEDIA CLIPS
APRIL 2024**

	Date	Media Outlet	Title	Country	Link	Total Readership
78	4/19/2024	KLBK News - EverythingLubbock.com	YLWD Dedicates its PFAS Water Treatment Plant to Highlight Dr. J. Wayne Miller's Contributions	United States	https://www.everythinglubbock.com/business/press-releases/ein-presswire/704755067/ylwd-dedicates-its-pfas-water-treatment-plant-to-highlight-dr-j-wayne-millers-contributions	303,067
79	4/19/2024	OurQuadCities	YLWD Dedicates its PFAS Water Treatment Plant to Highlight Dr. J. Wayne Miller's Contributions	United States	https://www.ourquadcities.com/business/press-releases/ein-presswire/704755067/ylwd-dedicates-its-pfas-water-treatment-plant-to-highlight-dr-j-wayne-millers-contributions	94,164
80	4/19/2024	KFOR	YLWD Dedicates its PFAS Water Treatment Plant to Highlight Dr. J. Wayne Miller's Contributions	United States	https://kfor.com/business/press-releases/ein-presswire/704755067/ylwd-dedicates-its-pfas-water-treatment-plant-to-highlight-dr-j-wayne-millers-contributions	1,310,801
81	4/19/2024	KNWA & FOX24 News	YLWD Dedicates its PFAS Water Treatment Plant to Highlight Dr. J. Wayne Miller's Contributions	United States	https://www.nwahomepage.com/business/press-releases/ein-presswire/704755067/ylwd-dedicates-its-pfas-water-treatment-plant-to-highlight-dr-j-wayne-millers-contributions	263,841
82	4/19/2024	Westernslopenow.com	YLWD Dedicates its PFAS Water Treatment Plant to Highlight Dr. J. Wayne Miller's Contributions	United States	https://www.westernslopenow.com/business/press-releases/ein-presswire/704755067/ylwd-dedicates-its-pfas-water-treatment-plant-to-highlight-dr-j-wayne-millers-contributions	134,458

**OCWD BRAND
MEDIA CLIPS
APRIL 2024**

	Date	Media Outlet	Title	Country	Link	Total Readership
83	4/19/2024	ABC4 Utah	YLWD Dedicates its PFAS Water Treatment Plant to Highlight Dr. J. Wayne Miller's Contributions	United States	https://www.abc4.com/business/press-releases/ein-presswire/704755067/ylwd-dedicates-its-pfas-water-treatment-plant-to-highlight-dr-j-wayne-millers-contributions	1,278,490
84	4/19/2024	Media World Today	YLWD Dedicates its PFAS Water Treatment Plant to Highlight Dr. J. Wayne Miller's Contributions	United States	https://www.mediaworldtoday.com/article/704755067-ylwd-dedicates-its-pfas-water-treatment-plant-to-highlight-dr-j-wayne-miller-s-contributions	949
85	4/19/2024	PIX11	YLWD Dedicates its PFAS Water Treatment Plant to Highlight Dr. J. Wayne Miller's Contributions	United States	https://pix11.com/business/press-releases/ein-presswire/704755067/ylwd-dedicates-its-pfas-water-treatment-plant-to-highlight-dr-j-wayne-millers-contributions	1,648,703
86	4/19/2024	WREG News Channel 3	YLWD Dedicates its PFAS Water Treatment Plant to Highlight Dr. J. Wayne Miller's Contributions	United States	https://wreg.com/business/press-releases/ein-presswire/704755067/ylwd-dedicates-its-pfas-water-treatment-plant-to-highlight-dr-j-wayne-millers-contributions	850,583
87	4/19/2024	KELOLAND Media Group	YLWD Dedicates its PFAS Water Treatment Plant to Highlight Dr. J. Wayne Miller's Contributions	United States	https://www.keloland.com/business/press-releases/ein-presswire/704755067/ylwd-dedicates-its-pfas-water-treatment-plant-to-highlight-dr-j-wayne-millers-contributions	515,944
88	4/19/2024	WFRV Local 5	YLWD Dedicates its PFAS Water Treatment Plant to Highlight Dr. J. Wayne Miller's Contributions	United States	https://www.wearegreenbay.com/business/press-releases/ein-presswire/704755067/ylwd-dedicates-its-pfas-water-treatment-plant-to-highlight-dr-j-wayne-millers-contributions	588,840

**OCWD BRAND
MEDIA CLIPS
APRIL 2024**

	Date	Media Outlet	Title	Country	Link	Total Readership
89	4/19/2024	WLNS	YLWD Dedicates its PFAS Water Treatment Plant to Highlight Dr. J. Wayne Miller's Contributions	United States	https://www.wlns.com/business/press-releases/ein-presswire/704755067/ylwd-dedicates-its-pfas-water-treatment-plant-to-highlight-dr-j-wayne-millers-contributions	314,248
90	4/19/2024	FOX16.com	YLWD Dedicates its PFAS Water Treatment Plant to Highlight Dr. J. Wayne Miller's Contributions	United States	https://www.fox16.com/business/press-releases/ein-presswire/704755067/ylwd-dedicates-its-pfas-water-treatment-plant-to-highlight-dr-j-wayne-millers-contributions	178,196
91	4/19/2024	WAVY TV 10	YLWD Dedicates its PFAS Water Treatment Plant to Highlight Dr. J. Wayne Miller's Contributions	United States	https://www.wavy.com/business/press-releases/ein-presswire/704755067/ylwd-dedicates-its-pfas-water-treatment-plant-to-highlight-dr-j-wayne-millers-contributions	1,625,198
92	4/19/2024	WJHL	YLWD Dedicates its PFAS Water Treatment Plant to Highlight Dr. J. Wayne Miller's Contributions	United States	https://www.wjhl.com/business/press-releases/ein-presswire/704755067/ylwd-dedicates-its-pfas-water-treatment-plant-to-highlight-dr-j-wayne-millers-contributions	430,823
93	4/19/2024	CW39	YLWD Dedicates its PFAS Water Treatment Plant to Highlight Dr. J. Wayne Miller's Contributions	United States	https://cw39.com/business/press-releases/ein-presswire/704755067/ylwd-dedicates-its-pfas-water-treatment-plant-to-highlight-dr-j-wayne-millers-contributions	121,162

**OCWD BRAND
MEDIA CLIPS
APRIL 2024**

	Date	Media Outlet	Title	Country	Link	Total Readership
94	4/19/2024	Binghamtonhomepage.com	YLWD Dedicates its PFAS Water Treatment Plant to Highlight Dr. J. Wayne Miller's Contributions	United States	https://www.binghamtonhomepage.com/business/press-releases/ein-presswire/704755067/ylwd-dedicates-its-pfas-water-treatment-plant-to-highlight-dr-j-wayne-millers-contributions	54,325
95	4/19/2024	CW33	YLWD Dedicates its PFAS Water Treatment Plant to Highlight Dr. J. Wayne Miller's Contributions	United States	https://cw33.com/business/press-releases/ein-presswire/704755067/ylwd-dedicates-its-pfas-water-treatment-plant-to-highlight-dr-j-wayne-millers-contributions	51,539
96	4/19/2024	The World Newswire	YLWD Dedicates its PFAS Water Treatment Plant to Highlight Dr. J. Wayne Miller's Contributions	United States	https://www.theworldnewswire.com/article/704755067-ylwd-dedicates-its-pfas-water-treatment-plant-to-highlight-dr-j-wayne-miller-s-contributions	933
97	4/19/2024	12WBOY	YLWD Dedicates its PFAS Water Treatment Plant to Highlight Dr. J. Wayne Miller's Contributions	United States	https://www.wboy.com/business/press-releases/ein-presswire/704755067/ylwd-dedicates-its-pfas-water-treatment-plant-to-highlight-dr-j-wayne-millers-contributions	420,889
98	4/19/2024	KRQE News 13	YLWD Dedicates its PFAS Water Treatment Plant to Highlight Dr. J. Wayne Miller's Contributions	United States	https://www.krqe.com/business/press-releases/ein-presswire/704755067/ylwd-dedicates-its-pfas-water-treatment-plant-to-highlight-dr-j-wayne-millers-contributions	908,172
99	4/19/2024	FOX40	YLWD Dedicates its PFAS Water Treatment Plant to Highlight Dr. J. Wayne Miller's Contributions	United States	https://fox40.com/business/press-releases/ein-presswire/704755067/ylwd-dedicates-its-pfas-water-treatment-plant-to-highlight-dr-j-wayne-millers-contributions	870,247

**OCWD BRAND
MEDIA CLIPS
APRIL 2024**

	Date	Media Outlet	Title	Country	Link	Total Readership
100	4/19/2024	ABC 8News	YLWD Dedicates its PFAS Water Treatment Plant to Highlight Dr. J. Wayne Miller's Contributions	United States	https://www.wric.com/business/press-releases/ein-presswire/704755067/ylwd-dedicates-its-pfas-water-treatment-plant-to-highlight-dr-j-wayne-millers-contributions	1,064,581
101	4/18/2024	PR Wire India	YLWD Dedicates its PFAS Water Treatment Plant to Highlight Dr. J. Wayne Miller's Contributions	India	https://prwireindia.com/press-release/ylwd-dedicates-its-pfas-water-treatment-plant-to-highlight-dr-j-wayne-miller-s-contributions	5,333
102	4/18/2024	MENAFN	YLWD Dedicates Its PFAS Water Treatment Plant To Highlight Dr. J. Wayne Miller's Contributions	Jordan	https://menafn.com/1108113126/YLWD-Dedicates-Its-PFAS-Water-Treatment-Plant-To-Highlight-Dr-J-Wayne-Millers-Contributions	170,278
103	4/18/2024	EIN Presswire	YLWD Dedicates its PFAS Water Treatment Plant to Highlight Dr. J. Wayne Miller's Contributions - Environmental News Today - EIN Presswire	United States	https://www.einnews.com/pr_news/704755067/ylwd-dedicates-its-pfas-water-treatment-plant-to-highlight-dr-j-wayne-miller-s-contributions	130,416
104	4/18/2024	KMLK	YLWD Dedicates its PFAS Water Treatment Plant to Highlight Dr. J. Wayne Miller's Contributions	United States	https://lifestyle.mykmlk.com/story/50687963/ylwd-dedicates-its-pfas-water-treatment-plant-to-highlight-dr-j-wayne-millers-contributions	755
105	4/18/2024	ENVIRONMENTAL NEWS TODAY	YLWD Dedicates its PFAS Water Treatment Plant to Highlight Dr. J. Wayne Miller's Contributions	United States	https://environment.einnews.com/pr_news/704755067/ylwd-dedicates-its-pfas-water-treatment-plant-to-highlight-dr-j-wayne-miller-s-contributions	691

**OCWD BRAND
MEDIA CLIPS
APRIL 2024**

	Date	Media Outlet	Title	Country	Link	Total Readership
106	4/18/2024	UNFCCC CONFERENCES OF THE PARTIES NEWS TODAY	YLWD Dedicates its PFAS Water Treatment Plant to Highlight Dr. J. Wayne Miller's Contributions	United States	https://cop.einnews.com/pr_news/704755067/ylwd-dedicates-its-pfas-water-treatment-plant-to-highlight-dr-j-wayne-miller-s-contributions	665
107	4/18/2024	WVNS 59News	YLWD Dedicates its PFAS Water Treatment Plant to Highlight Dr. J. Wayne Miller's Contributions	United States	https://www.wvntv.com/business/press-releases/ein-presswire/704755067/ylwd-dedicates-its-pfas-water-treatment-plant-to-highlight-dr-j-wayne-millers-contributions	186,056
108	4/18/2024	WANE 15	YLWD Dedicates its PFAS Water Treatment Plant to Highlight Dr. J. Wayne Miller's Contributions	United States	https://www.wane.com/business/press-releases/ein-presswire/704755067/ylwd-dedicates-its-pfas-water-treatment-plant-to-highlight-dr-j-wayne-millers-contributions	598,675
109	4/18/2024	News 8 WROC	YLWD Dedicates its PFAS Water Treatment Plant to Highlight Dr. J. Wayne Miller's Contributions	United States	https://www.rochesterfirst.com/business/press-releases/ein-presswire/704755067/ylwd-dedicates-its-pfas-water-treatment-plant-to-highlight-dr-j-wayne-millers-contributions	636,324
110	4/18/2024	JD Supra	Fifteen California Cities and Water Districts File a Lawsuit on the Heels of EPA's Announcement of MCLs for PFAS in Drinking Water	United States	https://www.jdsupra.com/legalnews/fifteen-california-cities-and-water-3228306	514,473
111	4/18/2024	Meyers Nave	PFAS Safe Drinking Water Act Maximum Contaminant Levels Set	United States	https://www.meyersnave.com/pfas-safe-drinking-water-act-mcls-set/	2,336
112	4/17/2024	Orange County Tribune	Water/sewer rates will go up	United States	https://orangecountytribune.com/2024/04/17/water-sewer-rates-will-go-up/	5,357

**OCWD BRAND
MEDIA CLIPS
APRIL 2024**

	Date	Media Outlet	Title	Country	Link	Total Readership
113	4/17/2024	www.edhat.com	'Forever Chemicals': Water supplies Throughout California will Exceed New National Limits	United States	https://www.edhat.com/news/forever-chemicals-water-supplies-throughout-california-will-exceed-new-national-limits/	123,175
114	4/17/2024	The Driller	California Water Utilities File PFAS Lawsuit Citing New EPA Standards	United States	https://www.thedriller.com/articles/92956-california-water-utilities-file-pfas-lawsuit-citing-new-epa-standards	13,320
115	4/17/2024	Hacker News: Newest	Is the tap water safe to drink in Huntington Beach?	United States	https://www.ncesc.com/geographic-faq/is-the-tap-water-safe-to-drink-in-huntington-beach	365,328
116	4/17/2024	smartwatermagazine.com	California water systems lawsuit against PFAS manufacturers cites new EPA regulations	United States	https://smartwatermagazine.com/news/smart-water-magazine/california-water-systems-lawsuit-against-pfas-manufacturers-cites-new-epa	42,900
117	4/16/2024	CAWG	DAILY DIGEST, 4/16: Trinity, Tijuana Rivers named among America's Most Endangered Rivers® of 2024; EPA has limited six 'forever chemicals' in drinking water – but there are 15,000; KWUA disappointed with Klamath allocation; What happens if there is no agreement on post-2026 Colorado River operations?; and more ...	United States	https://mavensnotebook.com/2024/04/16/daily-digest-4-16-trinity-tijuana-rivers-named-among-americas-most-endangered-rivers-of-2024-epa-has-limited-six-forever-chemicals-in-drinking-water-but/	14,216
118	4/16/2024	Reuters	New PFAS lawsuit cites EPA's 'forever chemicals' drinking water rules	United States	https://www.reuters.com/legal/litigation/new-pfas-lawsuit-cites-epas-forever-chemicals-drinking-water-rules-2024-04-15/	37,951,147

**OCWD BRAND
MEDIA CLIPS
APRIL 2024**

	Date	Media Outlet	Title	Country	Link	Total Readership
119	4/15/2024	TradingView	New PFAS lawsuit cites EPA's 'forever chemicals' drinking water rules	United States	https://www.tradingview.com/news/reuters.com,2024:newsml_L2N3GO24T:0-new-pfas-lawsuit-cites-epa-s-forever-chemicals-drinking-water-rules/	28,059,709
120	4/12/2024	KPBS	'Forever chemicals': Water supplies throughout California will exceed new national limits	United States	https://www.kpbs.org/news/health/2024/04/11/forever-chemicals-water-supplies-california-exceed-new-national-limits	465,427
121	4/11/2024	Head Topics	Toxic Chemicals Found in California Water Systems	Germany	https://headtopics.com/us/toxic-chemicals-found-in-california-water-systems-50733230	54,975
122	4/11/2024	ACWA	Orange County Water District Swiftly Responds to EPA PFAS Ruling	United States	https://www.acwa.com/news/orange-county-water-district-swiftly-responds-to-epa-pfas-ruling/	5,978
123	4/11/2024	Fullerton Observer	Orange County Water District Swiftly Responds to EPA's PFAS Ruling	United States	https://fullertonobserver.com/2024/04/11/orange-county-water-district-swiftly-responds-to-epas-pfas-ruling/	16,750
124	4/11/2024	Pasadena Now	'Forever Chemicals': Water Supplies Throughout California Will Exceed New National Limits	United States	https://www.pasadenanow.com/main/forever-chemicals-water-supplies-throughout-california-will-exceed-new-national-limits	196,190
125	4/11/2024	KQED	California Water Supplies to Exceed New National Limits on 'Forever Chemicals'	United States	https://www.kqed.org/news/11982531/california-water-supplies-to-exceed-new-national-limits-on-forever-chemicals	1,359,569
126	4/11/2024	San Jose Inside	California Water Rules Allow New Banned Chemicals San Jose Inside	United States	https://www.sanjoseinside.com/news/california-water-rules-allow-new-banned-chemicals/	29,334
127	4/10/2024	LAist	'Forever Chemicals': Water Supplies Throughout California Will Exceed New National Limits LAist	United States	https://laist.com/news/climate-environment/chemicals-water-supplies-california-national-limits	860,169

**OCWD BRAND
MEDIA CLIPS
APRIL 2024**

	Date	Media Outlet	Title	Country	Link	Total Readership
128	4/10/2024	Tracy Press	'Forever chemicals': Water supplies throughout California will exceed new national limits	United States	https://www.ttownmedia.com/news/state/forever-chemicals-water-supplies-throughout-california-will-exceed-new-national-limits/article_d09c70c0-c930-5aa1-8af5-0cf1e4673fe5.html	57,880
129	4/10/2024	Santa Ynez Valley News	'Forever chemicals': Water supplies throughout California will exceed new national limits	United States	https://syvnews.com/news/local/state-and-regional/forever-chemicals-water-supplies-throughout-california-will-exceed-new-national-limits/article_23186bc1-b8b8-5b12-950d-3a4f6ae8dc19.html	16,697
130	4/10/2024	LAist	Forever Chemicals	United States	https://laist.com/brief/news/climate-environment/chemicals-water-supplies-california-national-limits	860,169
131	4/10/2024	www.record-bee.com	'Forever chemicals': Water supplies throughout California will exceed new national limits	United States	https://www.record-bee.com/2024/04/10/forever-chemicals-water-supplies-throughout-california-will-exceed-new-national-limits/	26,168
132	4/10/2024	CalMatters	Water nationwide will exceed new 'forever chemicals' limits - CalMatters	United States	https://calmatters.org/environment/water/2024/04/drinking-water-forever-chemicals-new-standards	1,143,762
133	4/10/2024	CAWG	CAL MATTERS: 'Forever chemicals': Water supplies throughout California will exceed new national limits	United States	https://mavensnotebook.com/2024/04/10/cal-matters-forever-chemicals-water-supplies-throughout-california-will-exceed-new-national-limits/	23,842
134	4/10/2024	Yahoo News	Federal EPA limits toxic 'forever chemicals' in drinking water	Australia	https://au.news.yahoo.com/federal-epa-limits-toxic-forever-100019372.html	2,476,714

**OCWD BRAND
MEDIA CLIPS
APRIL 2024**

	Date	Media Outlet	Title	Country	Link	Total Readership
135	4/10/2024	CalMatters	'Forever chemicals': Water supplies throughout California will exceed new national limits	United States	http://app2.cision.com/redir?s=10007000036312229&startDate=1712620800000&endDate=1712793600000	1,143,762
136	4/10/2024	Ojai Valley News - Home	'Forever chemicals': Water supplies throughout California will exceed new national limits Water ojaivalleynews.com	United States	https://www.ojaivalleynews.com/news/water/forever-chemicals-water-supplies-throughout-california-will-exceed-new-national-limits/article_356f7516-f78d-11ee-8bc8-f76a21b9c076.html	32,039
137	4/9/2024	Yahoo News	Federal EPA limits toxic 'forever chemicals' in drinking water	United States	https://malaysia.news.yahoo.com/federal-epa-limits-toxic-forever-100019372.html	673,614
138	4/9/2024	Public now	City of Santa Ana, CA - Ward 1 newsletter: April 2024	United States	http://app2.cision.com/redir?s=10007000035956386&startDate=1712534400000&endDate=1712707200000	75,187
139	4/4/2024	Ca.marketscreener.com	H2O Innovation Awarded Eight New Water Treatment Projects, Including its Largest One to Date for the Los Angeles Sanitation and Environment -April 04, 2024 at 11:21 am MarketScreener	France	https://ca.marketscreener.com/quote/stock/H2O-INNOVATION-INC-1410316/news/H2O-Innovation-Awarded-Eight-New-Water-Treatment-Projects-Including-its-Largest-One-to-Date-for-the-46364711	116,463
140	4/4/2024	www.enpublishing.co.uk	H2O Innovation Awarded Eight New Water Treatment Projects, Including its Largest One to Date for the Los Angeles Sanitation and Environment	United Kingdom	http://app2.cision.com/redir?s=10007000034663258&startDate=1712102400000&endDate=1712275200000	622
141	4/3/2024	The Associated Press	H2O Innovation Awarded Eight New Water Treatment Projects, Including its Largest One to Date for the Los Angeles Sanitation and Environment	United States	https://apnews.com/press-release/business-wire/los-angeles-innovation-inc-construction-and-engineering-california-2b525291c9b441008eac2d567f0c0417	42,286,388

**OCWD BRAND
MEDIA CLIPS
APRIL 2024**

	Date	Media Outlet	Title	Country	Link	Total Readership
142	4/3/2024	Business Wire	H2O Innovation Awarded Eight New Water Treatment Projects, Including its Largest One to Date for the Los Angeles Sanitation and Environment	United States	https://www.businesswire.com/news/home/20240403411653/en/H2O-Innovation-Awarded-Eight-New-Water-Treatment-Projects-Including-its-Largest-One-to-Date-for-the-Los-Angeles-Sanitation-and-Environment	2,187,468
143	4/3/2024	oilandgaspress.com	H2O Innovation Awarded Eight New Water Treatment Projects, Including its Largest One to Date for the Los Angeles Sanitation and Environment	United Kingdom	https://oilandgaspress.com/h2o-innovation-awarded-eight-new-water-treatment-projects-including-its-largest-one-to-date-for-the-los-angeles-sanitation-and-environment/	858
144	4/3/2024	Le Léopard	H2O Innovation Awarded Eight New Water Treatment Projects, Including its Largest One to Date for the Los Angeles Sanitation and Environment	Canada	https://www.leleopard.com/en/news-21320741.html	21,837
145	4/3/2024	Edmonton Sun	H2O Innovation Awarded Eight New Water Treatment Projects, Including its Largest One to Date for the Los Angeles Sanitation and Environment	Canada	https://edmontonsun.com/pm/business-wire-news-releases-pmn/h2o-innovation-awarded-eight-new-water-treatment-projects-including-its-largest-one-to-date-for-the-los-angeles-sanitation-and-environment	96,614
146	4/3/2024	The Ridgway Record	H2O Innovation Awarded Eight New Water Treatment Projects, Including its Largest One to Date for the Los Angeles Sanitation and Environment	United States	http://business.ridgwayrecord.com/ridgwayrecord/article/bizwire-2024-4-3-h2o-innovation-awarded-eight-new-water-treatment-projects-including-its-largest-one-to-date-for-the-los-angeles-sanitation-and-environment	845

**OCWD BRAND
MEDIA CLIPS
APRIL 2024**

	Date	Media Outlet	Title	Country	Link	Total Readership
147	4/3/2024	The Community Post	H2O Innovation Awarded Eight New Water Treatment Projects, Including its Largest One to Date for the Los Angeles Sanitation and Environment	United States	http://business.minstercommunitypost.com/minstercommunitypost/article/bizwire-2024-4-3-h2o-innovation-awarded-eight-new-water-treatment-projects-including-its-largest-one-to-date-for-the-los-angeles-sanitation-and-environment	592
148	4/3/2024	business.thepilotnews.com	H2O Innovation Awarded Eight New Water Treatment Projects, Including its Largest One to Date for the Los Angeles Sanitation and Environment	United States	http://business.thepilotnews.com/thepilotnews/article/bizwire-2024-4-3-h2o-innovation-awarded-eight-new-water-treatment-projects-including-its-largest-one-to-date-for-the-los-angeles-sanitation-and-environment	1,811
149	4/3/2024	Elk Valley Times	H2O Innovation Awarded Eight New Water Treatment Projects, Including its Largest One to Date for the Los Angeles Sanitation and Environment	United States	https://www.elkvalleytimes.com/news/business/h2o-innovation-awarded-eight-new-water-treatment-projects-including-its-largest-one-to-date-for/article_218b6cf6-0efd-5b98-b22a-d53f520dede9.html	15,197
150	4/3/2024	Businesswire	H(2) O Innovation Awarded Eight New Water Treatment Projects, Including its Largest One to Date for the Los Angeles Sanitation and Environment	United States	http://app2.cision.com/redirect?s=10007000034310552&startDate=1712059200712&endDate=1712232000712	2,187,468
151	4/3/2024	Ca.marketscreener.com	H2O Innovation Inc. Receives Eight New Water Treatment Projects, Including Its Largest One to Date for the Los Angeles Sanitation and Environment -April 03, 2024 at 08:00 am MarketScreener	France	https://ca.marketscreener.com/quote/stock/H2O-INNOVATION-INC-1410316/news/H2O-Innovation-Inc-Receives-Eight-New-Water-Treatment-Projects-Including-Its-Largest-One-to-Date-f-46351016	116,463

**OCWD BRAND
MEDIA CLIPS
APRIL 2024**

	Date	Media Outlet	Title	Country	Link	Total Readership
152	4/3/2024	Daily Times Leader	H2O Innovation Awarded Eight New Water Treatment Projects, Including its Largest One to Date for the Los Angeles Sanitation and Environment User dailytimesleader.com	United States	http://business.dailytimesleader.com/dailytimesleader/article/bizwire-2024-4-3-h2o-innovation-awarded-eight-new-water-treatment-projects-including-its-largest-one-to-date-for-the-los-angeles-sanitation-and-environment	1,608
153	4/3/2024	Big Spring Herald - Business	H2O Innovation Awarded Eight New Water Treatment Projects, Including its Largest One to Date for the Los Angeles Sanitation and Environment User bigspringherald.com	United States	http://business.bigspringherald.com/bigspringherald/article/bizwire-2024-4-3-h2o-innovation-awarded-eight-new-water-treatment-projects-including-its-largest-one-to-date-for-the-los-angeles-sanitation-and-environment	2,906
154	4/3/2024	StreetInsider.com	H2O Innovation Awarded Eight New Water Treatment Projects, Including its Largest One to Date for the Los Angeles Sanitation and Environment	United States	https://www.streetinsider.com/Press+Releases/H2O+Innovation+Awarded+Eight+New+Water+Treatment+Projects%2C+Including+its+Largest+One+to+Date+for+the+Los+Angeles+Sanitation+and+Environment/23019761.html	1,268,966
155	4/3/2024	Markets.financialcontent.com	H2O Innovation Awarded Eight New Water Treatment Projects, Including its Largest One to Date for the Los Angeles Sanitation and Environment	United States	https://markets.financialcontent.com/observernewsonline/article/bizwire-2024-4-3-h2o-innovation-awarded-eight-new-water-treatment-projects-including-its-largest-one-to-date-for-the-los-angeles-sanitation-and-environment	71,147

**OCWD BRAND
MEDIA CLIPS
APRIL 2024**

	Date	Media Outlet	Title	Country	Link	Total Readership
156	4/3/2024	Financial Post	H2O Innovation Awarded Eight New Water Treatment Projects, Including its Largest One to Date for the Los Angeles Sanitation and Environment	Canada	https://financialpost.com/pmn/business-wire-news-releases-pmn/h2o-innovation-awarded-eight-new-water-treatment-projects-including-its-largest-one-to-date-for-the-los-angeles-sanitation-and-environment	1,500,811
157	4/3/2024	Regina Leader Post	H2O Innovation Awarded Eight New Water Treatment Projects, Including its Largest One to Date for the Los Angeles Sanitation and Environment	Canada	https://leaderpost.com/pmn/business-wire-news-releases-pmn/h2o-innovation-awarded-eight-new-water-treatment-projects-including-its-largest-one-to-date-for-the-los-angeles-sanitation-and-environment	207,119
158	4/3/2024	The Stony Plain Reporter	H2O Innovation Awarded Eight New Water Treatment Projects, Including its Largest One to Date for the Los Angeles Sanitation and Environment	Canada	https://www.stonyplainreporter.com/pmn/business-wire-news-releases-pmn/h2o-innovation-awarded-eight-new-water-treatment-projects-including-its-largest-one-to-date-for-the-los-angeles-sanitation-and-environment	835
159	4/3/2024	Toronto Sun	H2O Innovation Awarded Eight New Water Treatment Projects, Including its Largest One to Date for the Los Angeles Sanitation and Environment	Canada	https://torontosun.com/pmn/business-wire-news-releases-pmn/h2o-innovation-awarded-eight-new-water-treatment-projects-including-its-largest-one-to-date-for-the-los-angeles-sanitation-and-environment	2,478,967

**OCWD BRAND
MEDIA CLIPS
APRIL 2024**

	Date	Media Outlet	Title	Country	Link	Total Readership
160	4/3/2024	Markets.financialcontent.com	H2O Innovation Awarded Eight New Water Treatment Projects, Including its Largest One to Date for the Los Angeles Sanitation and Environment	United States	https://markets.financialcontent.com/winslow/article/bizwire-2024-4-3-h2o-innovation-awarded-eight-new-water-treatment-projects-including-its-largest-one-to-date-for-the-los-angeles-sanitation-and-environment	71,147
161	4/3/2024	Markets.financialcontent.com	H2O Innovation Awarded Eight New Water Treatment Projects, Including its Largest One to Date for the Los Angeles Sanitation and Environment	United States	https://markets.financialcontent.com/bigspringherald/article/bizwire-2024-4-3-h2o-innovation-awarded-eight-new-water-treatment-projects-including-its-largest-one-to-date-for-the-los-angeles-sanitation-and-environment	71,147
162	4/3/2024	Morningstar	H2O Innovation Awarded Eight New Water Treatment Projects, Including its Largest One to Date for the Los Angeles Sanitation and Environment	United States	https://www.morningstar.com/news/business-wire/20240403411653/h2o-innovation-awarded-eight-new-water-treatment-projects-including-its-largest-one-to-date-for-the-los-angeles-sanitation-and-environment	4,159,564
163	4/3/2024	The Province	H2O Innovation Awarded Eight New Water Treatment Projects, Including its Largest One to Date for the Los Angeles Sanitation and Environment	Canada	https://theprovince.com/pmn/business-wire-news-releases-pmn/h2o-innovation-awarded-eight-new-water-treatment-projects-including-its-largest-one-to-date-for-the-los-angeles-sanitation-and-environment	340,389

**OCWD BRAND
MEDIA CLIPS
APRIL 2024**

	Date	Media Outlet	Title	Country	Link	Total Readership
164	4/3/2024	The Belleville Intelligencer	H2O Innovation Awarded Eight New Water Treatment Projects, Including its Largest One to Date for the Los Angeles Sanitation and Environment	Canada	https://www.intelligencer.ca/pmnl/business-wire-news-releases-pmn/h2o-innovation-awarded-eight-new-water-treatment-projects-including-its-largest-one-to-date-for-the-los-angeles-sanitation-and-environment	27,136
165	4/3/2024	National Post	H2O Innovation Awarded Eight New Water Treatment Projects, Including its Largest One to Date for the Los Angeles Sanitation and Environment	Canada	https://nationalpost.com/pmnl/business-wire-news-releases-pmn/h2o-innovation-awarded-eight-new-water-treatment-projects-including-its-largest-one-to-date-for-the-los-angeles-sanitation-and-environment	822,618
166	4/3/2024	Yahoo Finance	H2O Innovation Awarded Eight New Water Treatment Projects, Including its Largest One to Date for the Los Angeles Sanitation and Environment	United States	https://finance.yahoo.com/news/h2o-innovation-awarded-eight-water-120000360.html	48,993,117
167	4/3/2024	Markets.financialcontent.com	H2O Innovation Awarded Eight New Water Treatment Projects, Including its Largest One to Date for the Los Angeles Sanitation and Environment	United States	https://markets.financialcontent.com/starkvilledailynews/article/bizwire-2024-4-3-h2o-innovation-awarded-eight-new-water-treatment-projects-including-its-largest-one-to-date-for-the-los-angeles-sanitation-and-environment	71,147
168	4/3/2024	Markets.financialcontent.com	H2O Innovation Awarded Eight New Water Treatment Projects, Including its Largest One to Date for the Los Angeles Sanitation and Environment	United States	https://markets.financialcontent.com/buffnews/article/bizwire-2024-4-3-h2o-innovation-awarded-eight-new-water-treatment-projects-including-its-largest-one-to-date-for-the-los-angeles-sanitation-and-environment	71,147

**OCWD BRAND
MEDIA CLIPS
APRIL 2024**

	Date	Media Outlet	Title	Country	Link	Total Readership
169	4/3/2024	CEO.CA	H2O Innovation Awarded Eight New Water Treatment Projects, Including its Largest One to Date for the Los Angeles Sanitation and Environment	Canada	https://ceo.ca/@businesswire/h2o-innovation-awarded-eight-new-water-treatment-projects	175,961
170	4/3/2024	Markets.financialcontent.com	H2O Innovation Awarded Eight New Water Treatment Projects, Including its Largest One to Date for the Los Angeles Sanitation and Environment	United States	https://markets.financialcontent.com/townhall/article/bizwire-2024-4-3-h2o-innovation-awarded-eight-new-water-treatment-projects-including-its-largest-one-to-date-for-the-los-angeles-sanitation-and-environment	71,147
171	4/3/2024	Markets.financialcontent.com	H2O Innovation Awarded Eight New Water Treatment Projects, Including its Largest One to Date for the Los Angeles Sanitation and Environment	United States	https://markets.financialcontent.com/bpas/article/bizwire-2024-4-3-h2o-innovation-awarded-eight-new-water-treatment-projects-including-its-largest-one-to-date-for-the-los-angeles-sanitation-and-environment	71,147
172	4/3/2024	Markets.financialcontent.com	H2O Innovation Awarded Eight New Water Treatment Projects, Including its Largest One to Date for the Los Angeles Sanitation and Environment	United States	https://markets.financialcontent.com/minstercommunitypost/article/bizwire-2024-4-3-h2o-innovation-awarded-eight-new-water-treatment-projects-including-its-largest-one-to-date-for-the-los-angeles-sanitation-and-environment	71,147
173	4/3/2024	Prince George Post	H2O Innovation Awarded Eight New Water Treatment Projects, Including its Largest One to Date for the Los Angeles Sanitation and Environment	Canada	https://www.princegeorgepost.com/pmn/business-wire-news-releases-pmn/h2o-innovation-awarded-eight-new-water-treatment-projects-including-its-largest-one-to-date-for-the-los-angeles-sanitation-and-environment	1,338

**OCWD BRAND
MEDIA CLIPS
APRIL 2024**

	Date	Media Outlet	Title	Country	Link	Total Readership
174	4/3/2024	Londoner	H2O Innovation Awarded Eight New Water Treatment Projects, Including its Largest One to Date for the Los Angeles Sanitation and Environment	Canada	https://www.thelondoner.ca/pmn/business-wire-news-releases-pmn/h2o-innovation-awarded-eight-new-water-treatment-projects-including-its-largest-one-to-date-for-the-los-angeles-sanitation-and-environment	3,004
175	4/3/2024	Markets.financialcontent.com	H2O Innovation Awarded Eight New Water Treatment Projects, Including its Largest One to Date for the Los Angeles Sanitation and Environment	United States	https://markets.financialcontent.com/smdailypress/article/bizwire-2024-4-3-h2o-innovation-awarded-eight-new-water-treatment-projects-including-its-largest-one-to-date-for-the-los-angeles-sanitation-and-environment	71,147
176	4/3/2024	Markets.financialcontent.com	H2O Innovation Awarded Eight New Water Treatment Projects, Including its Largest One to Date for the Los Angeles Sanitation and Environment	United States	https://markets.financialcontent.com/kelownadailycourier/article/bizwire-2024-4-3-h2o-innovation-awarded-eight-new-water-treatment-projects-including-its-largest-one-to-date-for-the-los-angeles-sanitation-and-environment	71,147
177	4/3/2024	Markets.financialcontent.com	H2O Innovation Awarded Eight New Water Treatment Projects, Including its Largest One to Date for the Los Angeles Sanitation and Environment	United States	https://markets.financialcontent.com/kane-republican/article/bizwire-2024-4-3-h2o-innovation-awarded-eight-new-water-treatment-projects-including-its-largest-one-to-date-for-the-los-angeles-sanitation-and-environment	71,147

**OCWD BRAND
MEDIA CLIPS
APRIL 2024**

	Date	Media Outlet	Title	Country	Link	Total Readership
178	4/3/2024	Markets.financialcontent.com	H2O Innovation Awarded Eight New Water Treatment Projects, Including its Largest One to Date for the Los Angeles Sanitation and Environment	United States	https://markets.financialcontent.com/chroniclejournal/article/bizwire-2024-4-3-h2o-innovation-awarded-eight-new-water-treatment-projects-including-its-largest-one-to-date-for-the-los-angeles-sanitation-and-environment	71,147
179	4/3/2024	Markets.financialcontent.com	H2O Innovation Awarded Eight New Water Treatment Projects, Including its Largest One to Date for the Los Angeles Sanitation and Environment	United States	https://markets.financialcontent.com/theveningleader/article/bizwire-2024-4-3-h2o-innovation-awarded-eight-new-water-treatment-projects-including-its-largest-one-to-date-for-the-los-angeles-sanitation-and-environment	71,147
180	4/3/2024	Markets.financialcontent.com	H2O Innovation Awarded Eight New Water Treatment Projects, Including its Largest One to Date for the Los Angeles Sanitation and Environment	United States	https://markets.financialcontent.com/malvern-online/article/bizwire-2024-4-3-h2o-innovation-awarded-eight-new-water-treatment-projects-including-its-largest-one-to-date-for-the-los-angeles-sanitation-and-environment	71,147
181	4/3/2024	Mitchell Advocate	H2O Innovation Awarded Eight New Water Treatment Projects, Including its Largest One to Date for the Los Angeles Sanitation and Environment	Canada	https://www.mitchelladvocate.com/pmn/business-wire-news-releases-pmn/h2o-innovation-awarded-eight-new-water-treatment-projects-including-its-largest-one-to-date-for-the-los-angeles-sanitation-and-environment	691

**OCWD BRAND
MEDIA CLIPS
APRIL 2024**

	Date	Media Outlet	Title	Country	Link	Total Readership
182	4/3/2024	Calgary Sun	H2O Innovation Awarded Eight New Water Treatment Projects, Including its Largest One to Date for the Los Angeles Sanitation and Environment	Canada	https://calgarysun.com/pmn/business-wire-news-releases-pmn/h2o-innovation-awarded-eight-new-water-treatment-projects-including-its-largest-one-to-date-for-the-los-angeles-sanitation-and-environment	125,978
183	4/3/2024	Strathroy Age Dispatch	H2O Innovation Awarded Eight New Water Treatment Projects, Including its Largest One to Date for the Los Angeles Sanitation and Environment	Canada	https://www.strathroyagedispatch.com/pmn/business-wire-news-releases-pmn/h2o-innovation-awarded-eight-new-water-treatment-projects-including-its-largest-one-to-date-for-the-los-angeles-sanitation-and-environment	1,691
184	4/3/2024	Edmonton Examiner	H2O Innovation Awarded Eight New Water Treatment Projects, Including its Largest One to Date for the Los Angeles Sanitation and Environment	Canada	https://www.edmontonexaminer.com/pmn/business-wire-news-releases-pmn/h2o-innovation-awarded-eight-new-water-treatment-projects-including-its-largest-one-to-date-for-the-los-angeles-sanitation-and-environment	939
185	4/3/2024	The Vancouver Sun	H2O Innovation Awarded Eight New Water Treatment Projects, Including its Largest One to Date for the Los Angeles Sanitation and Environment	Canada	https://vancouver.sun.com/pmn/business-wire-news-releases-pmn/h2o-innovation-awarded-eight-new-water-treatment-projects-including-its-largest-one-to-date-for-the-los-angeles-sanitation-and-environment	1,706,545

**OCWD BRAND
MEDIA CLIPS
APRIL 2024**

	Date	Media Outlet	Title	Country	Link	Total Readership
186	4/3/2024	Markets.financialcontent.com	H2O Innovation Awarded Eight New Water Treatment Projects, Including its Largest One to Date for the Los Angeles Sanitation and Environment	United States	https://markets.financialcontent.com/borgenewsherald/article/bizwire-2024-4-3-h2o-innovation-awarded-eight-new-water-treatment-projects-including-its-largest-one-to-date-for-the-los-angeles-sanitation-and-environment	71,147
187	4/3/2024	The Sudbury Star	H2O Innovation Awarded Eight New Water Treatment Projects, Including its Largest One to Date for the Los Angeles Sanitation and Environment	Canada	https://www.thesudburystar.com/pmn/business-wire-news-releases-pmn/h2o-innovation-awarded-eight-new-water-treatment-projects-including-its-largest-one-to-date-for-the-los-angeles-sanitation-and-environment	113,874
188	4/3/2024	Markets.financialcontent.com	H2O Innovation Awarded Eight New Water Treatment Projects, Including its Largest One to Date for the Los Angeles Sanitation and Environment	United States	https://markets.financialcontent.com/dptribune/article/bizwire-2024-4-3-h2o-innovation-awarded-eight-new-water-treatment-projects-including-its-largest-one-to-date-for-the-los-angeles-sanitation-and-environment	71,147
189	4/3/2024	Winnipeg Sun	H2O Innovation Awarded Eight New Water Treatment Projects, Including its Largest One to Date for the Los Angeles Sanitation and Environment	Canada	https://winnipeg.sun.com/pmn/business-wire-news-releases-pmn/h2o-innovation-awarded-eight-new-water-treatment-projects-including-its-largest-one-to-date-for-the-los-angeles-sanitation-and-environment	236,893

**OCWD BRAND
MEDIA CLIPS
APRIL 2024**

	Date	Media Outlet	Title	Country	Link	Total Readership
190	4/3/2024	Markets.financialcontent.com	H2O Innovation Awarded Eight New Water Treatment Projects, Including its Largest One to Date for the Los Angeles Sanitation and Environment	United States	https://markets.financialcontent.com/punxsutawneyspirit/article/bizwire-2024-4-3-h2o-innovation-awarded-eight-new-water-treatment-projects-including-its-largest-one-to-date-for-the-los-angeles-sanitation-and-environment	71,147
191	4/3/2024	Markets.financialcontent.com	H2O Innovation Awarded Eight New Water Treatment Projects, Including its Largest One to Date for the Los Angeles Sanitation and Environment	United States	https://markets.financialcontent.com/bostonherald/article/bizwire-2024-4-3-h2o-innovation-awarded-eight-new-water-treatment-projects-including-its-largest-one-to-date-for-the-los-angeles-sanitation-and-environment	71,147
192	4/3/2024	Markets.financialcontent.com	H2O Innovation Awarded Eight New Water Treatment Projects, Including its Largest One to Date for the Los Angeles Sanitation and Environment	United States	https://markets.financialcontent.com/sweetwaterreporter/article/bizwire-2024-4-3-h2o-innovation-awarded-eight-new-water-treatment-projects-including-its-largest-one-to-date-for-the-los-angeles-sanitation-and-environment	71,147
193	4/3/2024	FOX 40 WICZ TV	H2O Innovation Awarded Eight New Water Treatment Projects, Including its Largest One to Date for the Los Angeles Sanitation and Environment	United States	https://www.wicz.com/story/50635862/h2o-innovation-awarded-eight-new-water-treatment-projects-including-its-largest-one-to-date-for-the-los-angeles-sanitation-and-environment	74,521
194	4/3/2024	Markets.financialcontent.com	H2O Innovation Awarded Eight New Water Treatment Projects, Including its Largest One to Date for the Los Angeles Sanitation and Environment	United States	https://markets.financialcontent.com/penticonherald/article/bizwire-2024-4-3-h2o-innovation-awarded-eight-new-water-treatment-projects-including-its-largest-one-to-date-for-the-los-angeles-sanitation-and-environment	71,147

**OCWD BRAND
MEDIA CLIPS
APRIL 2024**

	Date	Media Outlet	Title	Country	Link	Total Readership
195	4/3/2024	Markets.financialcontent.com	H2O Innovation Awarded Eight New Water Treatment Projects, Including its Largest One to Date for the Los Angeles Sanitation and Environment	United States	https://markets.financialcontent.com/potdailynews/article/bizwire-2024-4-3-h2o-innovation-awarded-eight-new-water-treatment-projects-including-its-largest-one-to-date-for-the-los-angeles-sanitation-and-environment	71,147
196	4/3/2024	Markets.financialcontent.com	H2O Innovation Awarded Eight New Water Treatment Projects, Including its Largest One to Date for the Los Angeles Sanitation and Environment	United States	https://markets.financialcontent.com/wapakdailynews/article/bizwire-2024-4-3-h2o-innovation-awarded-eight-new-water-treatment-projects-including-its-largest-one-to-date-for-the-los-angeles-sanitation-and-environment	71,147
197	4/3/2024	Markets.financialcontent.com	H2O Innovation Awarded Eight New Water Treatment Projects, Including its Largest One to Date for the Los Angeles Sanitation and Environment	United States	https://markets.financialcontent.com/theplanetnews/article/bizwire-2024-4-3-h2o-innovation-awarded-eight-new-water-treatment-projects-including-its-largest-one-to-date-for-the-los-angeles-sanitation-and-environment	71,147
198	4/3/2024	Markets.financialcontent.com	H2O Innovation Awarded Eight New Water Treatment Projects, Including its Largest One to Date for the Los Angeles Sanitation and Environment	United States	https://markets.financialcontent.com/inregister/article/bizwire-2024-4-3-h2o-innovation-awarded-eight-new-water-treatment-projects-including-its-largest-one-to-date-for-the-los-angeles-sanitation-and-environment	71,147

**OCWD BRAND
MEDIA CLIPS
APRIL 2024**

	Date	Media Outlet	Title	Country	Link	Total Readership
199	4/3/2024	Markets.financialcontent.com	H2O Innovation Awarded Eight New Water Treatment Projects, Including its Largest One to Date for the Los Angeles Sanitation and Environment	United States	https://markets.financialcontent.com/decaturdailydemocrat/article/bizwire-2024-4-3-h2o-innovation-awarded-eight-new-water-treatment-projects-including-its-largest-one-to-date-for-the-los-angeles-sanitation-and-environment	71,147
200	4/3/2024	Markets.financialcontent.com	H2O Innovation Awarded Eight New Water Treatment Projects, Including its Largest One to Date for the Los Angeles Sanitation and Environment	United States	https://markets.financialcontent.com/tamarscurities/article/bizwire-2024-4-3-h2o-innovation-awarded-eight-new-water-treatment-projects-including-its-largest-one-to-date-for-the-los-angeles-sanitation-and-environment	71,147
201	4/3/2024	Sarnia and Lambton County This Week	H2O Innovation Awarded Eight New Water Treatment Projects, Including its Largest One to Date for the Los Angeles Sanitation and Environment	Canada	https://www.sarniathisweek.com/pmn/business-wire-news-releases-pmn/h2o-innovation-awarded-eight-new-water-treatment-projects-including-its-largest-one-to-date-for-the-los-angeles-sanitation-and-environment	8,938
202	4/3/2024	Markets.financialcontent.com	H2O Innovation Awarded Eight New Water Treatment Projects, Including its Largest One to Date for the Los Angeles Sanitation and Environment	United States	https://markets.financialcontent.com/times-online/article/bizwire-2024-4-3-h2o-innovation-awarded-eight-new-water-treatment-projects-including-its-largest-one-to-date-for-the-los-angeles-sanitation-and-environment	71,147

**OCWD BRAND
MEDIA CLIPS
APRIL 2024**

	Date	Media Outlet	Title	Country	Link	Total Readership
203	4/3/2024	Markets.financialcontent.com	H2O Innovation Awarded Eight New Water Treatment Projects, Including its Largest One to Date for the Los Angeles Sanitation and Environment	United States	https://markets.financialcontent.com/theantlersamerican/article/bizwire-2024-4-3-h2o-innovation-awarded-eight-new-water-treatment-projects-including-its-largest-one-to-date-for-the-los-angeles-sanitation-and-environment	71,147
204	4/3/2024	Canoe.Com	H2O Innovation Awarded Eight New Water Treatment Projects, Including its Largest One to Date for the Los Angeles Sanitation and Environment	Canada	https://canoe.com/pmnews-releases-pmn/h2o-innovation-awarded-eight-new-water-treatment-projects-including-its-largest-one-to-date-for-the-los-angeles-sanitation-and-environment	123,191
205	4/3/2024	The Bow Valley Crag & Canyon	H2O Innovation Awarded Eight New Water Treatment Projects, Including its Largest One to Date for the Los Angeles Sanitation and Environment	Canada	https://www.thecragandcanyon.ca/pmnews-releases-pmn/h2o-innovation-awarded-eight-new-water-treatment-projects-including-its-largest-one-to-date-for-the-los-angeles-sanitation-and-environment	7,282
206	4/3/2024	Calgary Herald	H2O Innovation Awarded Eight New Water Treatment Projects, Including its Largest One to Date for the Los Angeles Sanitation and Environment	Canada	https://calgaryherald.com/pmnews-releases-pmn/h2o-innovation-awarded-eight-new-water-treatment-projects-including-its-largest-one-to-date-for-the-los-angeles-sanitation-and-environment	1,136,265

**OCWD BRAND
MEDIA CLIPS
APRIL 2024**

	Date	Media Outlet	Title	Country	Link	Total Readership
207	4/3/2024	Markets.financialcontent.com	H2O Innovation Awarded Eight New Water Treatment Projects, Including its Largest One to Date for the Los Angeles Sanitation and Environment	United States	https://markets.financialcontent.com/stocks/article/bizwire-2024-4-3-h2o-innovation-awarded-eight-new-water-treatment-projects-including-its-largest-one-to-date-for-the-los-angeles-sanitation-and-environment	71,147
208	4/3/2024	Markets.financialcontent.com	H2O Innovation Awarded Eight New Water Treatment Projects, Including its Largest One to Date for the Los Angeles Sanitation and Environment	United States	https://markets.financialcontent.com/bentoncourier/article/bizwire-2024-4-3-h2o-innovation-awarded-eight-new-water-treatment-projects-including-its-largest-one-to-date-for-the-los-angeles-sanitation-and-environment	71,147
209	4/3/2024	Markets.financialcontent.com	H2O Innovation Awarded Eight New Water Treatment Projects, Including its Largest One to Date for the Los Angeles Sanitation and Environment	United States	https://markets.financialcontent.com/dailytimesleader/article/bizwire-2024-4-3-h2o-innovation-awarded-eight-new-water-treatment-projects-including-its-largest-one-to-date-for-the-los-angeles-sanitation-and-environment	71,147
210	4/3/2024	Public now	H2O Innovation Inc. - H2O Innovation Awarded Eight New Water Treatment Projects, Including its Largest One to Date for the Los Angeles Sanitation and Environment	United States	http://app2.cision.com/redirect?s=10007000034313936&startDate=1712016000000&endDate=1712188800000	75,187
211	4/3/2024	Gulf Oil And Gas	H2O Innovation Awarded Eight New Water Treatment Projects	United Arab Emir	http://app2.cision.com/redirect?s=10007000034443274&startDate=1712016000000&endDate=1712188800000	43,023
TOTAL READERSHIP						728,940,701