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ORANGE COUNTY WATER DISTRICT
ORANGE COUNTY'S GROUNDWATER AUTHORITY

August 5, 2021

The Honorable Dianne Feinstein
United States Senate
331 Hart Senate Office Bldg.
Washington, D.C. 20510

The Honorable Alex Padilla
United States Senate
112 Hart Senate Office Bldg.
Washington, D.C. 20510

RE: Oppose PFAS Amendment 2182

Dear Senators Feinstein and Padilla:

On behalf of the Orange County Water District (OCWD; the District) I am writing in strong opposition to Amendment SA 2182 that was submitted by United States Senators Kirsten Gillibrand (D-NY), Cory Booker (D-NJ), Dianne Feinstein (D-CA), and Richard Blumenthal (D-CT). The amendment would eliminate the need to perform a cost-benefit analysis in the development of a new drinking water standard and circumvent the Environmental Protection Agency's transparent, science-based process of regulating contaminants under the Safe Drinking Water Act.

OCWD supports a balanced approach to establishing new drinking water standards. Deleting the cost-benefit analysis from the regulation making process will burden ratepayers of all income levels with astronomical costs to comply with drinking water standards that far exceed their public health benefits. OCWD advocates to preserve the current cost-benefit analysis in the development of drinking water standards.

For reference, the following section of Amendment SA 2182 is of the greatest concern:

“(D) HEALTH RISK REDUCTION AND COST ANALYSIS.—In meeting the requirements of paragraph (3)(C) with respect to the national primary drinking water regulation for perfluoroalkyl and polyfluoroalkyl substances under subparagraph (A), the Administrator may rely on information available to the Administrator with respect to 1 or more specific perfluoroalkyl or polyfluoroalkyl substances to extrapolate reasoned conclusions with respect to the health risks and effects of a class of perfluoroalkyl or polyfluoroalkyl substances of which the specific perfluoroalkyl or polyfluoroalkyl substances are a part, including by using techniques described in— “(i) the document of the Environmental Protection Agency entitled ‘Generalized Read-Across (GenRA)’ (or a successor document); and “(ii) the Toxicity Estimation Software Tool of the Environmental Protection Agency (or a successor tool).”

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Again, I urge you oppose this amendment and support the development of drinking water standards consistent with the current Safe Drinking Water Act. I respectfully request that we discuss this matter at your earliest convenience. I can be reached at 949-230-7170 on my personal cell phone or a conference call can be scheduled through the District General Manager's office at 714-349-1677.

Sincerely,

A handwritten signature in blue ink that reads "Steve Sheldon".

Stephen R. Sheldon
Board President

cc:

Representative Linda Sanchez (CA-38)
Representative Young Kim (CA-39)
Representative Katie Porter (CA-45)
Representative Jose Luis "Lou" Correa (CA-46)
Representative Alan Lowenthal (CA-47)
Representative Michelle Steel (CA-48)
Representative Mike Levin (CA-49)