



September 25, 2019

**E. Joaquin Esquivel, Chair
State Water Resources Control Board
1001 I Street
Sacramento, CA 95814**

**Re: Urgent need for the State Water Resources Control Board to address PFAS
contaminants in drinking water as a class**

Dear Chair Esquivel and State Water Resources Control Board Members:

The Environmental Working Group (EWG), a nonprofit research and policy organization with offices in San Francisco and Sacramento, as well as nationally, urges the State Water Resources Control Board to address per- and polyfluorinated substances, or PFAS, in drinking water as a class.

On August 23, 2019, the Water Board announced that it had requested the state's Office of Environmental Health Hazard Assessment to develop public health goals for only two contaminants of the PFAS class, PFOA and PFOS.¹ Unfortunately, this narrow action leaves communities across the state at risk of exposure to other PFAS chemicals in drinking water, and effectively communicates to California residents that it is acceptable to drink water that contains PFAS other than PFOA or PFOS. In addition, the Water Board's limited public health goal request allows industrial and other dischargers that have contributed to PFAS pollution to avoid scrutiny.

Today EWG published an analysis that reveals the presence of at least nine different PFAS contaminants in drinking water supplies for 7.5 million Californians.² Reviewing the data available in the Water Board's own database, EWG found that testing detected PFBS, PFHpA, PFHxA, PFHxS, PFNA, PFDA, and ADONA, in addition to PFOA and PFOS. When PFAS were detected, they were frequently found as a mixture of various types. The extent of this contamination crisis has yet to be revealed, since no systematic testing for all PFAS in California water supplies has been done.

As examples of PFAS contamination of water supplies, more than 578 parts per trillion, or ppt, of eight PFAS chemicals was detected this year in a well of the City of Corona water system, and more than 450 ppt of six PFAS in a well of the California Water Service Company system for Oroville. In 2017, more than 400 ppt of six PFAS was found in a well of the California American Water Company system for Rosemont and other Sacramento suburbs.

Community water systems may have taken contaminated wells offline, blended water from contaminated wells with cleaner sources, or installed water treatment to reduce PFAS levels. But mitigation efforts do not make the problem go away. The costs of mitigating high PFAS levels are borne by the utility and often passed on to customers, and systems face challenges finding alternate sources of water when a source is shut down. At a time when clean water supplies in the state are at a premium, communities across California are affected by the PFAS contamination



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crisis, and the State Water Board should step up to address the problem as a whole rather than focusing on just two PFAS contaminants.

The full text of the EWG report and accompanying data table are submitted along with this letter. EWG requests that the Board grant EWG an opportunity to present this analysis at its next meeting. Further, EWG urges the Water Board to send a strong message that it cares about the health of the state's residents. Working together with OEHHA, the Board should take action to treat PFAS as a class and request OEHHA to develop a public health goal for total PFAS.

Submitted on behalf of the Environmental Working Group,

Tasha Stoiber, Ph.D., EWG Senior Scientist

Susan Little, EWG Senior Advocate, California Government Affairs

References

1. California Water Boards. Media Release. August 23, 2019. State Water Board Updates Guidelines for Testing and Reporting PFOA and PFOS As It Assesses Scope of Problem. www.waterboards.ca.gov/drinking_water/certlic/drinkingwater/PFOA_PFOS.html
2. Environmental Working Group. Toxic 'Forever Chemicals' Detected in Drinking Water Supplies Across California. September 25, 2019. www.ewg.org/research/toxic-forever-chemicals-detected-drinking-water-supplies-across-california