

For More Information:
Perchlorate Information Bureau
News Room: 916-448-3152
www.perchlorateinfo.org

STATEMENT FROM THE PERCHLORATE INFORMATION BUREAU

RE: Response to EPA's Notice Seeking Comments on New Approaches to Perchlorate Regulation

In recognition of comments by President Obama and EPA Administrator Jackson to science-based regulation, we welcome the opportunity to assist EPA in assessing its alternative approaches to analyzing perchlorate data, and acknowledge the Agency for the transparency of this process.

We have identified several areas within the Agency's August 19 notice and request for comment (Notice) that should add value to its consideration of whether to regulate perchlorate. Specifically:

- The scientific database on perchlorate--based on more than 50 years of research--validates EPA's 2008 preliminary determination not to set a national standard for perchlorate. The science clearly shows EPA's statutory criteria for setting a standard are unmet in this case.
- The science continues to demonstrate that perchlorate levels even 10 times higher than EPA's current health reference level (HRL) pose no threat to public health.
- The model proposed in the Notice includes several assumptions unsupported by the scientific database and as such do not likely represent the best scientific estimates of how perchlorate will act in the body at various doses. Even with these assumptions, however, the predicted effects would be indistinguishable from normal fluctuations due to diet and feeding styles.
- The alternative approach-- establishing HRLs based upon body weight and water consumption rates for various life stages instead of basing it on the most sensitive population-- is not justified by the science or past EPA practice. Authoritative scientific bodies have repeatedly shown the fetus is the most sensitive population to perchlorate; there is no justification for basing a HRL on a population other than the most sensitive.
- The most sensitive population is already considered under EPA's existing, conservative, health-protective HRL.
- The Notice includes data on perchlorate in drinking water which is nearly a decade old. As such it likely overstates both the concentrations of perchlorate in water (which according to the science do not pose a risk of health effects in any case) as well as the populations affected.

The Perchlorate Information Bureau shares Administrator Jackson's commitment to public health. Thus it's important to remember that even in the absence of additional regulation from Washington, extensive action is already being taken on perchlorate in affected areas across the country. States with recurring perchlorate issues – most notably California, Massachusetts and New Jersey- have set enforceable drinking water standards. Other states monitor perchlorate through regulatory guidance levels, and cleanup activities are taking place in several locations throughout the country.

###

The Perchlorate Information Bureau is supported by Aerojet, American Pacific Corporation, ATK, and Lockheed Martin. These companies have worked cooperatively with the U.S. Environmental Protection Agency to increase scientific and medical understanding of perchlorate's risk to human health.