

American Water Works Association

Oral Comments

Science Advisory Board Perchlorate Advisory Panel

July 18, 2010

These oral comments represent a summary of the written comments submitted relative to the charge questions set forth for this panel's consideration of perchlorate.

AWWA recommends that the Panel consider adding the following to the "charge" originally developed by EPA:

- **What are the scientific and regulatory ramifications of developing an MCLG for perchlorate based on a NOEL?**
- **Given that the NRC established the RfD at a level deemed protective of all sensitive subpopulations, is a life-stage analysis necessary and appropriate?**
- **Has the life-stage analysis appropriately considered perchlorate exposure relative to iodide intake?**
- **Does an MCLG for perchlorate represent a "meaningful opportunity" to effectively and efficiently reduce the stated public health risks associated with iodide deficiency?**
- **What are the implications of an MCLG on the treatment options available to water utilities?**