



**American Water Works  
Association**

The Authoritative Resource on Safe Water<sup>SM</sup>

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Mr. Thomas Carpenter  
U.S. Environmental Protection Agency  
Science Advisory Board Perchlorate Panel DFO  
(via email)

**RE: AWWA Comments on the Science Advisory Board (SAB) Final Draft Advisory Report on Approaches to Derive a Maximum Contaminant Level Goal for Perchlorate**

The American Water Works Association (AWWA) appreciates the opportunity to comment on the SAB's review of perchlorate as detailed in the draft final report issued on November 9, 2012. AWWA is an international, nonprofit, scientific and educational society dedicated to the improvement of drinking water quality and supply. Founded in 1881, the Association is the largest organization of water supply professionals in the world. Our 50,000 plus members represent the full spectrum of the drinking water community: treatment plant operators and managers, environmental advocates, engineers, scientists, academicians, and others who hold a genuine interest in water supply and public health. Our membership includes more than 4,000 utilities that supply roughly 80 percent of the nation's drinking water. Based on this broad membership base, these comments should be considered as representative of the drinking water community in general.

Prior comments submitted by AWWA recommended that the SAB reexamine their conclusion and recommendation that advises EPA to proceed with the development of a maximum contaminant level goal (MCLG) for perchlorate. The draft final report indicates that the panel still finds that the available scientific evidence is incomplete or deficient for supporting with certainty a scientifically significant assessment of the public health benefit. In the panel's review of the various charge questions we noted the following statements:

- *...risk can be reasonably inferred.*
- *...evidence suggests.*
- *...critical data on these effects do not exist.*
- *The limitation of using either the RfD in the default algebraic equation or IUI predicted by the model is that both describe a precursor event and neither explicitly provides predictions for subsequent events and adverse outcomes.*
- *The SAB finds that the epidemiological studies provided to the panel are inadequate for quantitatively estimating [the] reduction in adverse health effects realized in regulating perchlorate in drinking water.*

AWWA values the purpose and objective of the SAB. However, as stated in prior comments (letters dated July 10, 2012 and September 19, 2012), we remain concerned with the confidence associated with the SAB's recommendation to pursue an MCLG. The panel's assessment provides a sufficient level of doubt with regard to the potential for perchlorate to trigger inferred adverse effects that we request a withdrawal of the MCLG recommendation. The SAB recommends that the Agency use a PBPK modeling approach; however the SAB panel notes that the model is not capable of predicting an actual adverse effect.

We recommend that the SAB withdraw the recommendation and instead advise EPA to collaborate with other federal agencies to address the real public health issue of iodine deficiency. The SAB appears to recognize the risk associated with iodine deficiency in the literature review. In fact, the SAB noted that "the absence of effect may be due to high levels of iodine", thus acknowledging the efficacy of programs that encourage iodine-fortified prenatal vitamins. Ensuring the iodine sufficiency of the American diet mitigates multiple public health issues and would generate the greatest public health good relative to the sensitive populations described by the SAB. Both the SAB and the Agency are ignoring the total goitrogen exposure issue, some of which are singularly more significant than perchlorate and all combined far exceed perchlorate. Therefore, we believe it would be a more appropriate use of federal resources to pursue a health protective program that directly address' iodine deficiency.

AWWA appreciates the opportunity to comment on these important drinking water issues. If the SAB Perchlorate Panel has any questions about these comments, please feel to call Kevin Morley or me in our Washington Office at 202-628-8303.

Sincerely,

Tom Curtis  
Deputy Executive Director--Government Affairs

cc: Peter Gravatt, OGWDW  
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