San Bernardino County EHS/LUS and regulates about 270 water systems and permits the drilling of wells in our jurisdiction. Only 2-3 water systems under permit are in areas known to be affected by perchlorate in the groundwater. These systems currently mitigate perchlorate levels below the MCL, as required by the State Department of Public Health. While we do not currently require testing of perchlorate for newly drilled individual wells, we would be supportive of instituting a plan that suggests testing of that analyte in areas with known perchlorate plumes. Individual well permittees would be advised of the potential risks for levels exceeding the state MCL, and informed of mitigation methods. We could also develop a notification flyer that reiterates the PHG, and ask that our affected systems provide input.

The state Public Health Goal (PHG) is not an enforceable standard. “Maximum contaminant levels” are enforceable standards. A PHG is a desired level in water. MCLs are based as closely to PHGs as possible but a number of factors are also considered in making an MCL. Until such time that DPH changes the MCL, EHS will not change our current perchlorate enforcement policies.

You can send them to me. Once I receive the comments, I’ll email you a response that we received it and forward it to the toxicologist.