ADDENDUM FOR ATSDR'S TOXICOLOGICAL PROFILE FOR PERCHLORATES October 14, 2008

In ATSDR's Toxicological Profile for Perchlorates, which was finalized in September, 2008, Section 1.9 notes that "The EPA is currently undertaking efforts to make a determination as to whether or not a national primary drinking water regulation is needed for perchlorate. To make this determination, EPA is evaluating information to more fully characterize perchlorate exposure to determine if regulation of perchlorate in drinking water would represent a meaningful opportunity for reducing risks to human health as required under the Safe Drinking Water Act (SDWA)." More recently, the EPA has presented a Preliminary Regulatory Determination on Perchlorate in the Federal Register (73FR198:60262-60282) stating the EPA has determined that a national primary drinking water regulation (NDPWR) for perchlorate would not present "a meaningful opportunity for health risk reduction for persons served by public water systems."

Section 1.9, as well as Chapter 8 of the Toxicological Profile, notes that "EPA's Office of Solid Waste and Emergency Response has provided guidance for perchlorate that indicates that the RfD and its corresponding DWEL of 24.5 ppb are respectively the recommended "to be considered" (TBC) value and the preliminary remediation goal (PRG) for cleanup under the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA)." Table 8-1 of the profile also lists the existing PRG. However, EPA's Preliminary Regulatory Determination on Perchlorate also notes that the EPA will replace its existing PRG of 24.5 ppb with a health reference level (HRL) of 15 ppb for drinking water. EPA explained that the existing PRG was calculated with the assumption that all exposure comes from ground water at National Priorities List (NPL) sites, whereas the HRL was calculated using the RfD of 7 µg/kg/day and a relative source contribution from water, relative to a calculated contribution from food. EPA states that the final HRL will be the basis for a health advisory in the health advisory document that the agency expects to issue at the time of the final Regulatory Determination on Perchlorate. EPA notes that it may be appropriate to use the HRL as a TBC value in developing potential cleanup levels for perchlorate NPL sites.