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**STATEMENT RE: PERCHLORATE STUDY GROUP COMMENTS ON U.S. EPA
PROPOSED NATIONAL PUBLIC DRINKING WATER STANDARD FOR PERCHLORATE**

All comments may be attributed to Bill Romanelli – PSG Spokesperson

On March 9, 2026, the Perchlorate Study Group (PSG) filed comments with U.S. EPA highlighting that the agency’s proposed National Public Drinking Water Regulation (NPDWR) for perchlorate is overly conservative, would be health-protective even at a much higher level, does not justify the costs imposed, and - despite a court order requiring it - is in conflict with federal law.

- In its proposed NPDWR, U.S. EPA relies on a series of overly conservative assumptions and policy judgments that fall directly into the realm of speculative claims and result in an overreaching regulatory proposal. Just one example is U.S. EPA’s use of IQ decrement as an adverse effect. U.S. EPA does not identify any study demonstrating a direct relationship between perchlorate exposure and IQ outcomes (as no such studies exist) and expressly acknowledges that the available epidemiological evidence is inadequate to assess direct neurological effects of perchlorate exposure. Consequently, EPA’s proposed rule is in tension with Executive Order 14303, “Restoring Gold Standard Science” (May 23, 2025), which prohibits the use of “highly unlikely and overly precautionary assumptions and scenarios.”
- Nearly seven decades of scientific research on perchlorate demonstrate that there are no adverse health effects from perchlorate exposure at levels found in the environment, meaning that even levels much higher than those contemplated by U.S. EPA (20, 40 and 80 µg/L) would be health protective. In 2005, the National Academy of Sciences (NAS) determined that levels of perchlorate below 245 µg/L have no measurable effect on human health, and that even at levels as high as 14,000 µg/L, any effects are considered non adverse and reversible.
- The proposed NPDWR will impose substantial additional costs on water systems and ratepayers without delivering meaningful public health benefits. U.S. EPA’s own analysis highlights that the proposed regulation does not justify the costs. To quote from the Federal Register, **“Notwithstanding the Administrator’s determination the benefits would not justify the cost at any of the (Maximum Contaminant Levels) evaluated**, U.S. EPA is proposing and seeking comment on MCLs of 20 mg/L, 40 mg/L, or 80 mg/L.” *(emphasis added)*
- U.S. EPA is under a court order to propose and ultimately adopt a perchlorate regulation despite that such regulation is unjustified by the science, as evidenced above, and as such conflicts with federal law. The Safe Drinking Water Act requires that three key criteria must all be met before a contaminant can be regulated: (1) the contaminant may have an adverse effect on human health; (2) the contaminant occurs in public drinking water systems at a frequency and at levels of public health concern; and (3) in the sole judgment of the U.S. EPA Administrator, federal regulation of the contaminant presents a meaningful opportunity for health risk reduction. In 2020, U.S. EPA found that the second and third requirements were not satisfied, and therefore determined (for a second time) that perchlorate did not merit additional nationwide regulation. That determination was [subsequently upheld by the Biden Administration in 2022](#) after thorough review.

Please visit www.perchlorateinfo.org for factual information on perchlorate or contact Bill Romanelli at 916-212-1446.

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The Perchlorate Information Bureau is supported by Aerojet Rocketdyne, American Pacific Corporation, 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.