

Via Email/US Postal

June 7, 2007

Honorable Tam Doduc
Chair and Hearing Officer
State Water Resources Control Board
1011 I Street, 25th Floor [95814]
P.O. Box 100
Sacramento, CA 95812-0100



**Re: Perchlorate Contamination at a 160-Acre Site in the Rialto Area
(SWRCB/OCC File A-1824)**

Dear Chair Doduc:

In accordance with instructions set forth in the 3rd Revised Notice of Public Hearing in the Matter of Perchlorate Contamination at a 160-Acre Site in the Rialto Area, Environment California Research & Policy Center (Environment California) and the Center for Community Action and Environmental Justice (CCA EJ) respectfully submit the following rebuttal arguments regarding SWRCB/OCC File A-1824.

Perchlorate, the major ingredient in rocket fuel, pollutes the drinking water supplies of Rialto – a small working class, mostly minority community nestled beneath the San Bernardino Mountains. Although officials discovered the contamination nearly ten years ago, comprehensive cleanup has not yet begun. As the delay continues, the pollution spreads; residents pay increased water rates to fund cleanup and legal action; and officials worry about future water shortages in the drought-prone region. While local leaders have shut down or placed stop-gap treatment on wells polluted above California health warnings, out of date state detection methods mean many residents may continue to drink pollution considered unsafe in other states.¹

In proposing order 2005-0053, the Santa Ana Regional Water Board aims to take the single largest step to-date toward cleaning up the perchlorate pollution that plagues the Rialto-Colton region. In more than 10,000 pages of submissions and exhibits, the dischargers named in the draft order present a host of legal and technical claims that argue against its adoption. This policy brief, however, rebuts the overarching notion presented in the submissions that the core issue before the State Water Board in these proceedings is technical or legal in nature.

¹ While the California Office of Environmental Health Hazards Assessment has adopted a perchlorate public health goal of 6 parts per billion, the Massachusetts Department of Environmental Protection has established reference dose of 0.49 parts per billion and adopted a perchlorate drinking water standard of 2 parts per billion. The California method detection limit for purposes of reporting to the state is 4 parts per billion.

In fact, we strongly believe that the core issue before the board is to answer a single fundamental policy question -

Should California require that polluters who dump dangerous chemicals into drinking water clean up their mess?

CCAIEJ and Environment California firmly believe that the public interest answer to this question is a resounding yes. Any other answer would be contrary to the California Water Code, which states that

“The principles, guidelines, and objectives [adopted by the State Water Resources Control Board] shall be consistent with the state goal of providing a decent home and suitable living environment for every Californian.” (CWC §13142)

Furthermore, we believe that the submissions of Goodrich, Emhart and Pyro Spectaculars are in large part based upon a series of depositions, discovery demands, procedural objections and other legal maneuvers that have significantly hampered the ability of the public process to adequately address this question. As such, we urge the Board to give the answer to the fundamental policy question highlighted above the weight it deserves, even amidst the tens of thousands of pages of legal and technical arguments presented by the dischargers named in the proposed order. In addition, we urge the Board to ensure that remediation requirements contained in a final draft order reflect its overriding public policy mandate to ensure that polluters that dump dangerous chemicals into drinking water are required to clean up their mess.

A. The State Water Board must correct a situation that is overwhelmingly unfair to the public

Rocket fuel pollution was first discovered in Rialto's drinking water supplies nearly ten years ago. For members of the public who expected rapid, comprehensive and immediate action to restore clean water, the effort to clean up perchlorate in the Rialto region has instead been wracked by interminable delay. As the delay continues, contamination spreads, residents pay increased water rates and local officials grapple with the possibility of future water shortages in a drought-prone region.

While allegations of unfairness have been leveled by all parties to this proceeding and are directly and implicitly referenced throughout the April submissions of the dischargers named in the proposed order, it is important to highlight in this rebuttal brief that the overriding unfairness in this situation is to the residents of Rialto and the general California public.

- It is unfair that a Rialto grandmother must worry whether the water her children drank as she raised them was dangerously polluted;

- It is unfair that a Rialto mother must decide whether to buy new shoes for her children or pay her hefty new water bill;
- It is unfair that the Rialto community bears a growing stigma as a town severely polluted by rocket fuel;
- It is unfair that a Central Valley farmer may need to give up water for his fields to compensate for closed groundwater wells in Southern California;
- It is unfair that a Los Angeles resident worries that the delay in Rialto's cleanup indicates lax safeguards for drinking water throughout the state.

The High Cost of Rocket Fuel Pollution to Rialto and Colton Residents

The environmental and public health ramifications of spreading perchlorate contamination on the Rialto public receive well-deserved attention from policy makers and the media. As described in a letter jointly submitted by Senators Barbara Boxer and Dianne Feinstein to the Hearing Officer on May 31, 2007, scientists have found that “perchlorate can harm the functioning of the thyroid gland, which guides mental and physical development, especially of pregnant women, infants and children. A 2006 Centers for Disease Control study found that even low perchlorate levels can harm the thyroid’s normal functioning, particularly in iodine-deficient women.” The only standard for perchlorate in drinking water in the nation, established by the Massachusetts Department of Environmental Protection, is two parts per billion and is based on a perchlorate reference dose of 0.49 parts per billion.² Translated into plain English, this means that the scientists who recommended this safety threshold to the State of Massachusetts believe that perchlorate poses some threat to health at levels as small as about half a drop of perchlorate in an Olympic-sized swimming pool.

While the public health and environmental ramifications of perchlorate contamination in drinking water receive considerable attention, the economic impact of the pollution on the Rialto Colton region cannot be overlooked. The high cost of these proceedings and the ensuing cleanup is directly and indirectly referenced throughout the April submissions of the dischargers named in Proposed Order 2005-0053. In considering these arguments, however, it is important for the State Water Board and the Hearing Officer to also remember the economic impact of contamination on the Rialto-Colton region.

² In June 2006, the Massachusetts Department of Health Services issued a reference dose for perchlorate of 0.49 parts per billion – equivalent to approximately half a drop of perchlorate in an Olympic-sized swimming pool. A reference dose is the scientific estimate of the total daily exposure from drinking, eating, breathing or absorbing a chemical. The Massachusetts reference dose is not expected to cause adverse health effects in humans, even vulnerable populations [Office of Research and Standards Massachusetts Department of Environmental Protection, ‘Update to Perchlorate Toxicological Profile and Health Assessment In Support of: Perchlorate Maximum Contaminant Level (310CMR 22.06) Perchlorate Cleanup Standards (310 CMR 40.000) June 2006]

Over the past several years, not only have the residents of the Rialto-Colton region endured the environmental and public health threats wrought by the spreading plume of rocket fuel under the region; the residents of the mostly working-class, minority community of Rialto with a per capita income of \$15,327 have also been forced to pay increased water rates amounting to more than \$10 million to fund stop gap cleanup measures, legal action and other perchlorate remediation activities.³ The surcharge, which can amount to hundreds of dollars more in utility costs for a family each year—coupled with rising costs of gasoline, food and healthcare—places a real strain on working families.

Furthermore, families in the region that do not want to risk exposure to perchlorate at levels that meet California's public health goal but not health warnings issued in other states must incur the dramatically increased cost of buying bottled water. An acre-foot of water is approximately the amount of water needed to supply a family household of four for a year.⁴ According to the Southern California Association of Governments, for example, the cost of an acre-foot of water in Los Angeles is \$820. The cost of an acre-foot of Arrowhead Mountain Spring Water is \$137,000 and the cost of an acre-foot of Evian Natural Spring Water is \$1.7 million.

A Statewide Contamination Crisis

In addition to its direct impact on efforts to clean up perchlorate contamination in the Rialto region, and because it will establish statewide cleanup precedent for perchlorate-contaminated sites across the state, these proceedings also have serious implications for the general California public.

The pollution of California's drinking water supplies with perchlorate – the major ingredient in rocket fuel – is one of the most pressing drinking water contamination issues facing the state. According to the State Water Resources Control Board (State Water Board) and Department of Toxic Substances Control (DTSC) 'Geotracker' database, perchlorate pollutes approximately 563 drinking water wells in the state. The database lists 34 perchlorate contaminated sites that fall within the regulatory sphere of the Board or DTSC. At more than 70 percent of these sites, contamination is associated with aerospace, explosives or ordnance-related activities.⁵

The pollution impacts the lives of real people across California - from the San Martin grandfather who can no longer drink from his backyard well, to the families

³ Riverside Press Enterprise, "Rialto to audit funds for perchlorate suits," April 27 2007, downloaded from http://www.pe.com/localnews/rialto/stories/PE_News_Local_B_baudit28.b54b9f.html

⁴ Southern California Association of Governments, "Water, Water Hardly Anywhere: What Will the Region Drink in 2020," Steven P.Erie, Director, Urban Studies and Planning Program, University of California San Diego

⁵ State Water Resources Control Board, Geotracker Confirmed Perchlorate Report, available at geotracker3.ecointeractive.com/slic_perchlorate/report_confirmed.asp?cmd=detailedsite -

of the Torrez Martinez Indian Reservation who were forced to switch from Colorado River water to bottled water after pollution of their well,.

In addition to the public health and environmental implications of perchlorate pollution, the degradation of groundwater with this toxin has ramifications for the statewide water supply. According to the Groundwater Association of California, nearly half of California's water supply comes from groundwater.⁶ In drought years groundwater meets an even larger percentage of statewide water demand. When local water groundwater supplies are debilitated or incapacitated by pollution, the ensuing increased need for water imports from other parts of the state rises. As such, contamination of groundwater wells in the Rialto Colton region could increase the need for more water imports from the State Water Project or other sources.

The potential for this increased demand is particularly troubling, given the state's drought cycle, the need to reduce water exports from the Delta in order to save the Delta Smelt population and its related ecosystem from collapse, and the prospect of a reduced Sierra snow pack caused by global climate change.

In short, the local groundwater resources of communities like Rialto and Colton are precious and must be made whole - not only to protect the local community but also to establish a cleanup precedent for contaminated sites across the state and to reduce the potential for further strain on the statewide water supply.

B. Californians want drinking water that is free of rocket fuel pollution

Californians expect their drinking water to be completely free of rocket fuel pollution. This is especially true when scientists believe that very low concentrations (as low as ½ a drop of perchlorate in an Olympic-sized swimming pool) can be associated with health conditions like attention deficit disorder, learning disabilities and decreased IQ.⁷ The public's expectation is not based in hysteria or a lack of education in risk assessment. This expectation is based upon two fundamental public policy concepts: 1. No family should have to drink pollution dumped into its drinking water; and 2. If you make a mess, you clean it up.

Unfortunately, the April submissions of the parties named in Proposed Order 2005-0053 do not recognize these basic policy concepts and even more troubling, do not recognize the right of the public to articulate these concerns. In fact, Goodrich's 'critique' of Environment California and CCAEJ's participation in the State Water Board proceeding as articulated in its April submission is

⁶ California Groundwater Management, A Resource for Future Generations, Groundwater Resources Association of California, second edition 2005.

⁷ [Office of Research and Standards Massachusetts Department of Environmental Protection, 'Update to Perchlorate Toxicological Profile and Health Assessment In Support of: Perchlorate Maximum Contaminant Level (310CMR 22.06) Perchlorate Cleanup Standards (310 CMR 40.000) June 2006]

predicated on the notion that the public's expectation of rocket fuel-free drinking water can be easily dismissed if not articulated by a certified hydrogeologist, toxicologist, or member of another listed profession.⁸ On the contrary, these basic and widely accepted policy concepts can be easily articulated by a stay-at-home mom, a farm-worker, or a school teacher.

1. No family should have to drink pollution dumped into its drinking water

No parent will give his or her child a glass of water that contains perchlorate contamination at a concentration of six parts per billion if he or she can secure a perchlorate-free glass of water. The parent is even less likely to allow his or her child to drink a glass of water contaminated with perchlorate at a level of six parts per billion if told that the glass meets California health standards, but not those established in Massachusetts. What pregnant woman would be comfortable knowing that she is serving her family contamination at three times the level considered safe in other states? What father would be comfortable giving his newborn baby water that contains a toxin that has been associated by scientists to attention deficit disorder, learning disabilities, and decreased IQ at miniscule amounts?

In blatant disregard of this public expectation, Goodrich Corporation argues in its submission that Californians should drink water polluted at more than *ten times* safety levels issued in California and *one hundred times* safety levels adopted in other states.⁹ This assertion is nothing short of appalling and lacks any grounding in the public interest.

In fact, Goodrich's assertion also runs contrary to the 2003 recommendations of the California Environmental Protection Agency's Advisory Committee on Environmental Justice, which highlighted the importance of integrating the precautionary principle into enforcement actions taken by the agency in its 2003 recommendations.¹⁰ This principle is particularly important to policy-makers in the case of perchlorate due to mounting reports of widespread perchlorate detection in food supplies and milk, and studies that point to health risks at lower and lower levels.

Goodrich's also runs counter to the California Water Code itself, which urges the State Water Board to place the highest premium on protecting the state's waters from *any* degradation. §13000 of the California Water Code, for example, asserts that "*...the state must be prepared to exercise its full power and jurisdiction to protect the quality of waters in the state from degradation*

⁸ Goodrich Corporation, "In the matter of perchlorate contamination at a 160-acre site in Rialto area (SWRCB/OCC File A-1824), Goodrich Corporation's Brief

⁹ *ibid.* p 221-224;

¹⁰ Recommendations of the California Environmental Protection Agency (CalEPA) Advisory Committee on Environmental Justice to the Cal EPA Interagency Working Group on Environmental Justice, Final Report, September 30, 2003; available at <http://www.calepa.ca.gov/EnvJustice/Documents/2003/FinalReport.pdf>.

*originating inside or outside the boundaries of the state.” Statute goes on to state explicitly that the beneficial uses of the waters of the state that may be protected against water quality degradation include domestic and municipal supply (CWC §13050) and that “the activities and factors which may affect the quality of the waters of the state shall be regulated to attain the highest water quality which is reasonable, given *all* demands being made and to be made on those waters and the total values involved, beneficial and detrimental, economic and social, tangible and intangible.” (CWC §13000)*

While some dischargers may be willing to subject families to the risks of continued exposure to dangerous rocket fuel toxins, the public deserves better. As an agent of the public, however, the State Water Board should reflect the public desire for a precautionary approach toward drinking water contamination, heed its statutory mandate and adopt a final cleanup order that ensures no family in Rialto should have to drink *any* amount of perchlorate pollution dumped into its drinking water. Instead of heeding Goodrich’s argument, the State Water Board should require full cleanup of perchlorate to a background level of water quality and require the provision of replacement water for all wells contaminated by perchlorate, not just those polluted above the state’s public health goal.

2. If you make a mess, you clean it up.

As children, our parents told us to clean up the mess we make. Californians carry this philosophy into adulthood and expect public officials to enforce this principle in their policy determinations.

Contrary to arguments presented in the submissions of Goodrich Corporation and Pyro Spectaculars, holding dischargers jointly and severally liable for cleanups of sites like the Rialto 160-acre parcel is fundamental to this ‘polluter pays’ approach.¹¹ Federal and state statute and regulations allow for and encourage cleanups to be conducted jointly and severally for important policy reasons: Firstly, it is unacceptable to delay cleanup of a site contaminated with hazardous substances simply because all responsible parties have not been identified. Secondly, a discharger named in a joint and several cleanups can pursue other parties to reapportion cleanup responsibility. The benefit of this approach is that the public does not have to determine this apportionment using public funds. As such, joint and several liability allows cleanups like those of the Rialto 160-acre site to proceed as quickly as possible while consuming as few public resources as possible.

The April submission by Goodrich Corporation also argues against the applicability of a host of California cleanup laws, including those that require full cleanup of groundwater pollution, allow for reimbursement of residents that have

¹¹ Goodrich Corporation, “In the matter of perchlorate contamination at a 160-acre site in the Rialto area (SWRCB/OCC File A-1824), Goodrich Corporation’s Brief pp 227-237; Pyro Spectaculars, Inc’s (“PSI”) Hearing Brief, “In the matter of perchlorate contamination at a 160-acre site in the Rialto area (SWRCB/OCC File A-1824) pp 17-20

paid for cleanup costs to date and allow for the provision of immediate replacement water to impacted residents until cleanup is complete.¹² These assertions are indisputably unacceptable from a public policy perspective and should be summarily dismissed in the State Water Board's policy determinations around this proceeding.

The California Water Code echoes the importance of requiring full cleanup of groundwater pollution and declares that "the people of the State have a primary interest in the correction and prevention of irreparable damage to, or impaired use of, the ground water basins of this State caused by....degraded water quality." (CWC §12922).

The State Water Board should thus uphold the principle that 'if you make a mess, you clean it up,' by requiring full cleanup of contamination to a background level of water quality and full reimbursement to residents of cleanup costs already expended.

C. Polluters should clean up the dangerous chemicals they dump in order to prevent the distortion of the public process

As described in the opening to this brief, in the public's mind the core question before the board in these proceedings is:

Should California require that polluters who dump dangerous chemicals into drinking water clean up their mess?

Given the importance of the public as the central stakeholder in this proceeding, it is crucial that the policy question that the public cares about the most and lies at the core of this proceeding be adequately weighed by the State Water Resources Control Board.

Unfortunately, the ability of the public process to weigh the important policy considerations before it has been commandeered by seemingly unending attempts at legal maneuvering and distraction from the real policy issues at hand. This distraction is evident in the submissions of Goodrich, Emhart and Pyro Spectaculars, which are primarily based upon a series of depositions, discovery demands, procedural objections and other legal maneuvers that have significantly hampered the ability of the public process to adequately address the issues most important to the public in this proceeding.

The biggest distraction from the primarily policy questions before the board in this proceeding has been the dischargers' named in Proposed Order 2005-0053 effective transformation of the fundamental character of this proceeding from an

¹²Goodrich Corporation, "In the matter of perchlorate contamination at a 160-acre site in the Rialto area (SWRCB/OCC File A-1824), Goodrich Corporation's Brief pp 186-224

open public hearing into an extremely adversarial court trial. This change in character has diverted resources from the government agencies charged with evaluating policy questions, challenged the ability of seasoned public interest groups to adequately present even policy arguments in the proceedings, as well as discouraged the ability of the public fully participate in the proceedings.

The Santa Ana Regional Water Quality Control Board is the agency charged with adopting local policies to prevent the degradation of and protect the beneficial uses of waters within its jurisdiction. The ability of the Regional Board to accomplish this mission, however, has been severely compromised by the need to expend unprecedented public resources to pursue suspected dischargers, address charges of bias, and respond to discovery demands in this proceeding. Now dischargers named in proposed order 2005-0053 are even leveling charges of bias at the Hearing Officer and the State Water Resources Board.

Even more troubling than the strain placed on public agencies charged with overseeing cleanup is the impact that the volley of motions, countermotions and other legal missiles hurled by the throngs of law firms involved has had on the process. In effect, they have created a process that makes it almost impossible even for full time public interest advocates to follow key developments in the proceeding. As a result, they have lost almost all transparency and have become virtually inaccessible to the average member of the public. This is particularly tragic, given the importance of these proceedings to Rialto residents and Californians at large.

The weight given to policy arguments in this proceeding has also been compromised by the strain placed on non profit organizations who will present basic policy arguments on behalf of the public interest. In the past 60 days, for example, CCAEJ and Environment California have received no fewer than **20 subpoenas** and been subjected to **25 hours** of depositions. The sheer number of hours spent locating pro bono counsel, fulfilling discovery demands, and preparing for and attending depositions significantly diverted limited organizational resources away from a more extensive policy analysis.

Furthermore, for fear of subjecting additional people to hostile and intimidating depositions, CCAEJ and Environment California did not secure witnesses to present testimony at the hearing. As a result, no resident of Rialto will testify as a witness at the State Water proceeding, despite representing the most important stakeholder.

Attempts to minimize the weight given to public participation and policy matters in the proceeding are also evident in the April submission of Goodrich Corporation to the Hearing Officer, which critiques the involvement of Environment California Research & Policy Center and CCAEJ in the proceedings as 'irrelevant.' To the contrary, as non profit organizations with extensive experience in documenting, formulating and advocating on behalf of the public interest in California, both

Environment California Research & Policy Center and the Center for Community Action and Environmental Justice are well-positioned to articulate the public interest policy perspective in the present proceeding.

Formed exclusively to protect California's air, water and open spaces, Environment California Research & Policy Center is a statewide leader in building awareness about the promise of solar power and renewable energies in California. Environment California Research & Policy Center also conducted groundbreaking research on the harmful health effects linked to PBDEs, flame retardants linked to developmental problems in children. As part of this effort, we published and released a report that documented the health effects of the chemicals. In August 2003, California passed legislation that banned two types of PBDEs, PentaBDE and OctaBDE, making the state the first to ban a chemical in the U.S. in more than 20 years. Environment California Research & Policy Center has also authored two reports on the health risks of perchlorate to children's health and the debate around its health impacts, entitled "Rocket Fuel and Children's Health: The Case for a Strong Drinking Water Standard for Children's Health."

Formed in 1978 at the beginning of recognition of the hazards of chemical pollution in communities, the Center for Community Action and Environmental Justice (CCAIEJ) emerged to address the need for cleanup and to protect residents in Riverside County from health impacts of the Stringfellow Acid Pits, California's top priority Superfund site. The work of CCAIEJ has led to extensive public policy changes at the state and federal level. Those policy changes related to site remediation and issues highlighted by this proceeding include the following:

CCAIEJ participated in advocating for the creation of the federal CERCLA legislation in 1980 and later led the effort for a state Superfund program that would include 1) a funding source for the cleanup of toxic sites; 2) legal theories that advanced holding polluters liable for the damage done to communities (Strict, joint, several and retroactive liability); and 3) comprehensive public participation that recognized a statutory right of affected communities to be involved in decisions at contaminated sites. In addition, CCAIEJ lobbied to create the Agency for Toxic Substances Disease Registry (ATSDR) at the Centers for Disease Control to specifically address chemical exposure; hazardous materials response teams (HazMat Teams) to respond to chemical spills; and the Right to Know law that enables communities to know what pollution sources exist near them and CCAIEJ also served on the Executive Committee for Proposition 65, the landmark cancer notification law.

Through the efforts of CCAIEJ, the Glen Avon community was the first to have a technical advisor (used as the model for the Technical Assistance Grants in CERCLA); the first to have an Advisory Committee (now standard practice for public participation) and was the first community to be granted Intervenor status

in a federal enforcement action (much like the designated party status of these proceedings). CCAEJ's participation as an Intervenor was heard before the U.S. Supreme Court and we remain active parties in the enforcement action to this day. CCAEJ's expertise and relevance to the remedial process and public participation efforts were even recognized by the Stringfellow Steering Committee, a coordinating committee of responsible parties at Stringfellow.

On December 18, 1998, The Stringfellow Steering Committee recognized CCAEJ's important contributions in a commendation presented to Ms. Newman, Executive Director of CCAEJ which reads:

“The Stringfellow Steering Committee Member Companies
Hereby Acknowledge Our Respect And Appreciation
For Your Leadership In Representing
Community Interests As A Member Of The
Stringfellow Advisory Committee.

Your Relentless Efforts to encourage actions by
the administering agencies and private sector
companies has greatly contributed to investigative
and remedial actions that are occurring at the
Stringfellow Superfund Site.

Your Commitment to working with the potentially
responsible parties, administrative policymakers and
technical experts took Courage, Vision And Patience.

On Behalf of the Stringfellow Steering Committee
We Congratulate You for the contributions
you continue to make. “

Signed By Richard W. Madsen, Esq. Chairperson, Stringfellow Steering Committee (Legal Counsel For Rohr Industries, A Subsidiary Of Goodrich Corporation).

In order to prevent the further distortion of the public process and more distraction from the important policy questions central to this proceeding, the State Water Board should take steps to ensure that public participation is protected prior to, during and subsequent to the July hearing.

In addition, the need to outline an automatic process for enforcement of the order in the event of discharger delay takes on added importance given the diminished capacity of the public to participate in these proceedings to date.

Conclusion

California has a strong history of environmental leadership that has set policy precedent for the nation. In the past decade alone, the California Legislature adopted the nation's first requirement that a state incorporate environmental justice principles into the workings of state government; California Environmental Protection Secretary Terry Tamminen shepherded a host of ground-breaking environmental programs, including the nation's largest program to encourage solar power on rooftops. Just this past year, Governor Schwarzenegger signed the first mandatory cap on global warming emissions in the country into law.

The residents of Rialto and the people of California are looking to the State Water Board for similar leadership. The current proceedings provide the State Water Board and the Hearing Officer the opportunity to follow in this great tradition and establish a strong cleanup precedent for communities stricken by perchlorate around the state and across the nation.

For too long, communities in California and throughout the nation have been forced to grapple with the pollution of their drinking water supplies with a toxic rocket fuel chemical while polluters – who often boast sales in the billions – resist efforts to clean up the mess. This situation is unacceptable and must be corrected without any further delay.

By issuing a cleanup order that requires polluters to clean up every drop of perchlorate they have discharged, provide residents with a rocket fuel-free supply of water until cleanup is completed, reimburse residents for clean up costs that have come the public pocket, and pay strict penalties for further delay, the State Water Board will send a strong message to the residents of Rialto and Colton, the people of California and the rest of the nation –

If you dump dangerous chemicals into a community's drinking water supply, you will have to clean it up.

Sincerely,



Sujatha Jahagirdar
Clean Water Advocate
Environment California
Research & Policy Center

SJ
FCJ



Penny Newman
Executive Director
Center for Community Action
and Environmental Justice