



July 14, 2026

The Honorable Sheila F. Hanson
Presiding Judge of the Superior Court of California
700 Civic Center Drive West
Santa Ana, CA 92701

Re: Irvine Ranch Water District's Response to the Orange County Grand Jury's Report Titled
"PFAS and Public Awareness- A Closer Look at Orange County Drinking Water"

Presiding Judge Hanson:

On June 9, 2025, the Orange County Grand Jury released a report titled *"PFAS and Public Awareness- A Closer Look at Orange County Drinking Water."* This report requested that the Irvine Ranch Water District (IRWD) respond to certain findings and recommendations. Per the 2025-2026 Orange County Grand Jury's request, and in accordance with Penal Code 933.05, below are IRWD's responses to Findings F2, F4, F6, and F8, and Recommendations R2, R4 and R5.

Background Information:

IRWD provides high-quality drinking water, reliable wastewater collection and treatment, groundbreaking water recycling programs, and environmentally sound urban runoff treatment to approximately 450,000 residents and a daytime population of more than 600,000.

The District works daily to provide its customers with the highest-quality water possible. Our drinking water is continually tested and safe to drink straight from the tap. As part of our effort to ensure the highest-quality water, IRWD is leading the way on water quality testing and tests its water for many more chemicals than required by the state and federal government, including unregulated metals, pesticides and volatile organic compounds. This is done at our state-of-the-art and state-certified water quality laboratory.

IRWD Responses to Findings and Recommendations:

Finding F2: *"PFAS is widespread, and contamination has been detected in Orange County groundwater sources. Community water systems are required to report PFAS monitoring results in their annual Consumer Confidence Reports"*

Response: IRWD agrees with this finding.

Per- and polyfluoroalkyl substances (PFAS) are human-made chemicals that have been extensively used in consumer products such as carpets, clothing, cosmetics, fabrics for furniture,

paper packaging for food, fire-fighting foams, and other materials designed to be waterproof, stain-resistant, or nonstick.

PFAS has been detected in water throughout the United States, and has been detected in Orange County groundwater sources. Orange County has led the nation in PFAS testing and treatment to address PFAS in its groundwater.

Consumer Confidence Reports (CCR) are an annual report provided to customers of a Community Water System (CWS). The U.S. Environmental Protection Agency's (U.S. EPA) and the State Water Resources Control Board Division of Drinking Water's (DDW) regulate the content, disclosures included in, and distribution of CCRs.

Beginning in 2027, CWSs must begin reporting PFAS monitoring data in any CCR delivered after April 26, 2027, if the CWS has a detection as defined by federal regulations of PFAS in their drinking water. IRWD currently includes its PFAS test results in its CCR.

Finding F4: *"OCWD has taken a proactive leadership role in addressing PFAS in the Orange County Groundwater Basin, though PFAS treatment implementation varies across local cities and water districts."*

Response: IRWD agrees with this finding.

IRWD agrees that the Orange County Water District (OCWD) has taken a proactive and helpful leadership role in addressing PFAS in the Orange County Groundwater Basin. PFAS has been detected in the Orange County Groundwater Basin, entering the groundwater basin primarily due to Santa Ana River flows that infiltrate into the basin.

Despite not releasing PFAS into the environment, OCWD and the Orange County Groundwater Producers (Producers) have been working to remove it from local water supplies. OCWD has been committed to ensuring that the Orange County community is knowledgeable about PFAS and that the Producers have the resources to address PFAS contamination. OCWD has taken and/or continues to take the follow steps:

- Implemented a PFAS treatment policy that enables constructing treatment facilities for impacted water agencies, including funding 100% of design and construction costs, with operation and maintenance costs shared 50/50 with the retail water agency;

- Assist the Producers in compliance with DDW testing and notification requirements;
- Monitor to determine extent of compounds in the groundwater basin and in recharge water supplies;
- Pilot test treatment techniques for removal of PFAS in groundwater;
- Stay current with changing technology for both detection and treatment;
- Work with the Regional Water Quality Control Board regulators and the Santa Ana Watershed Project Authority to identify sources of PFAS;
- Obtained the first water quality laboratory in California to achieve state certification to analyze for PFAS in drinking water; and
- Obtain laboratory certification to test for more PFAS compounds.

Finding F6: *“Orange County drinking water meets or exceeds state and federal standards and is safe for consumption without additional home filtration.”*

Response: IRWD agrees with this finding.

IRWD is confident that the drinking water we provide to homes, businesses and schools is safe and meets all quality standards set by both the state and federal government. IRWD water quality experts continuously monitor the District’s water supplies, and conduct tens of thousands of laboratory tests each year on our supplies and throughout the IRWD service areas to ensure the water we serve our community is of high quality and safe without additional home filtration.

Finding F8: *“There are limited online PFAS education and outreach programs among Orange County water retailers. Most retailers rely on OCWD for PFAS education and outreach. PFAS advisories were included in approximately 55% of the Orange County water retailers’ annual water quality reports in 2025.”*

Response: IRWD disagrees partially with this finding.

Like other Producers, IRWD works with other water utilities and the Orange County Water District to better understand the impacts of PFAS in the groundwater basin and to examine appropriate treatment technologies. Unlike some OC water retailers that rely on OCWD for PFAS education and outreach, IRWD has not relied on OCWD but has independently worked to educate our customers about PFAS, although our outreach is complimentary to OCWD’s education efforts.

IRWD has a PFAS Primer on its website along with other water quality information. We try to answer the questions we get from our customers related to PFAS and other contaminants of concerns to our community. Our goal is to actively address our customers' concerns and questions with clear, scientifically based information. We do this through our website, tours, water quality workshops, and in personal interactions when we receive questions from customers.

With regards to 55% of Orange County water retailers including a PFAS advisory in their annual water report in 2025, IRWD does not disagree with this statement. IRWD's 2025 CCR did state that "The [IRWD's water quality] lab recently earned additional accreditation from the Environmental Laboratory Accreditation Program to test for PFAS, making IRWD one of the handful of laboratories in California to do so." Neither IRWD's 2025 nor 2026 CCR included an advisory on PFAS. While there was some PFAS detected at levels significantly below notification levels at the point when certain local and imported sources entered IRWD's system, there was no detectable PFAS in the water IRWD served its customers and so a PFAS advisory was not included in our report.

Recommendation 2: *"By July 1, 2029, OCWD and its member agencies should monitor PFAS in groundwater and surface water sources and promptly implement PFAS treatment when response levels are exceeded."*

Response: The recommendation has been implemented by IRWD.

IRWD currently monitors all of its water sources for PFAS, as required by DDW and as will be required by the U.S. EPA. IRWD already meets the new PFAS standards, which are scheduled to take effect in 2029. In fact, none of the water IRWD delivers to homes, businesses and schools contains any detectable PFAS.

As for promptly implementing PFAS treatment when response levels are exceeded, IRWD has either reduced use of a source or implemented treatment for PFAS when response levels of a particular source exceed the notification or response level. We always work to ensure the water we serve our community does not exceed a response level. For example, in 2018, IRWD proactively tested for PFAS and voluntarily shut down one well that had tested positive. That well remained out of service until treatment could be put in place. The treatment installed at the well removes all PFAS from the water drawn at that location and the well has been brought back into service.

IRWD, as with any contaminant, evaluates the appropriate approach to ensure the water served to our community is safe and meets all federal and state water quality standards. We implement the approach (e.g. pausing use of a source, blending or treatment) that is best given that commitment to our community.

Recommendation 4: *“By July 1, 2029, all Orange County water retailers should consistently include a PFAS advisory, treatment facilities status, and compliance information in consumer confidence reports and on agency websites, using clear and understandable language for the public.”*

Response: The recommendation will not be implemented by IRWD because it is not warranted given IRWD’s current approach to PFAS.

As noted above, IRWD currently monitors all of its water sources for PFAS. The water IRWD serves to its customers has no detectible PFAS in it, although some individual sources have tested positive for small amounts of PFAS. IRWD, in the spirit of transparency, posts this information and information about its PFAS treatment facilities on its website in clear and understandable language.

IRWD’s PFAS compliance information is already included in its CCR. By July 1, 2029, IRWD will include the appropriate PFAS advisory, when such an advisory is required, and compliance information in its CCR and on its website, using clear and understandable language for the public. IRWD will include an advisory in its CCR if it has a detection for PFAS, as defined by federal regulations. Because the contents of the CCR are defined by federal and state regulations, it is inappropriate to consistently include such an advisory unless there is a contaminant that meets the federal detection limit. For this reason, IRWD will not implement this recommendation although it will continue to disclose water quality results and treatment facility status to its customers.

Recommendation R5: *“By September 30, 2026, OCWD and all Orange County water retailers should enhance coordinated public education efforts to reassure their customers about drinking water safety.”*

Response: The recommendation will not be implemented by IRWD because it is not warranted given IRWD’s current and planned public education efforts on drinking water quality and safety.

IRWD, over its history, has communicated with its customers about the safety of its drinking water. Beginning in 2025, IRWD expanded its public outreach

and education efforts with regards to water quality. In 2025 alone, IRWD had over 4 million touchpoints with its customers on the safety and quality of its drinking water. For 2026, the District has already had almost 3 million touchpoints with its customers on water quality.

Through the District's public outreach and education efforts, IRWD works to reassure its customers about the safety and quality of their drinking water. Our effort includes use of social media, workshops, tours, our website and through water quality reports. We educate our customers on many aspects of water quality including how IRWD treats water, understanding water quality regulations and guidelines, a comparison of tap versus bottled water, and information about the inefficiencies of many at-home water treatment systems.

Because IRWD already undertakes, and plans to continue to undertake, a robust public outreach and education effort, consistent with our customers' expectations, an expansion in the District's public outreach and education effort is not needed to reassure its customers about the safety of their drinking water. While 8 in 10 IRWD customers view their drinking water as safe, we continue to work to reach those that do not, and we will coordinate with other Orange County water retailers, as appropriate, on educating the public about the safety of drinking water.

If you need further information regarding this response, please contact me at (949) 453-5590.

Sincerely,

A handwritten signature in blue ink, appearing to read "Paul A. Cook".

Paul A. Cook, P.E.
General Manager

cc: Orange County Grand Jury
IRWD Board of Directors