

**Responses to Major Comments on
Technical Support Document**

**Public Health Goal
For
Cadmium
In Drinking Water**

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INTRODUCTION

The following are responses to major comments received by the Office of Environmental Health Hazard Assessment (OEHHA) on the proposed public health goal (PHG) technical support document for cadmium as discussed at the PHG workshop held on October 6, 1998, or as revised following the workshop. Some commenters provided comments on both the first and second drafts. For the sake of brevity, we have selected the more important or representative comments for responses. Comments appear in quotation marks where they are directly quoted from the submission; paraphrased comments are in italics.

These comments and responses are provided in the spirit of the open dialogue among scientists that is part of the process under Health and Safety Code Section 57003. For further information about the PHG process or to obtain copies of PHG documents, visit the OEHHA web site at www.oehha.org. OEHHA may also be contacted at:

Office of Environmental Health Hazard Assessment
301 Capitol Mall, Room 205
Sacramento, California 95814
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RESPONSES TO MAJOR COMMENTS RECEIVED

U.S. EPA, Office of Drinking Water

Comment 1: The commenter questions the choice of the Buchet (1990) study as the basis for the PHG. She suggests that the results from Friberg et al. (1974) would have been more appropriate. She suggests including more details about the Buchet study in the PHG documents.

Response 1: The Buchet study was chosen because it is the only study that is based on the general population rather than workers who are generally healthier. It is also more recent than the Friberg studies. The Friberg studies were based on workers. The Buchet study results in a lower PHG than would have been the case if we had used the results of Friberg et al., so this was a case of choosing the more health conservative study. More details about the Buchet study will be added to the document as suggested.

Association of California Water Agencies

Comment 1: “There is no methodology available to measure the proposed PHG for Cadmium of 0.07 ppb.”

Response 1: According to the California Safe Drinking Water Act (CSDWA), PHGs are to consider only public health, and are not to take into account such practical considerations as detection limits.

Comment 2: “Does a PHG set below the DLR revert to the DLR for reporting purposes?”

Response 2: Reporting requirements are determined by CDHS. In the past CDHS has not required reporting of chemicals that are below the detection limit.

Comment 3: “The public perception that a system is not meeting an impossible detection limit can affect a system just as negatively as failing to meet the legal requirements.”

Response 3: See response 2 above. The CSDWA does not allow OEHHA to consider matters of “public perception” in setting levels for PHGs.