

November 2, 2009

Michael Baes
Pesticide and Environmental Toxicology Branch
Office of Environmental Health Hazard Assessment
California Environmental Protection Agency
1515 Clay St., 16th floor
Oakland, California 94612

Dear Dr. Baes,

On behalf of our various organizations and tens of thousands of California members, we the undersigned wish to express our support for the Office of Environmental Health Hazard Assessment's (OEHHA) draft Public Health Goal (PHG) for hexavalent chromium of .06 parts per billion (ppb). We believe that this health goal reflects the best science on hexavalent chromium and we urge OEHHA to move quickly to finalize the PHG so that California can meet its legal requirement to set a health-protective drinking-water standard.

OEHHA's analysis of the health risks associated with hexavalent chromium in water is an important breakthrough in that it considers the impacts of this most toxic form of chromium over the less hazardous chromium 3, and moves us toward truly protecting public health in a manner that relying on a total-chromium drinking water standard cannot do. Furthermore, it demonstrates an important link to cancer resulting from ingestion in drinking water. While hexavalent chromium was a known carcinogen when inhaled, OEHHA's analysis points out that it does not break down into a less toxic form after ingestion to the degree previously believed. That is, hexavalent chromium can be carcinogenic by the oral exposure route.

The link between ingesting hexavalent chromium in water and serious health impacts, including cancer, cannot be taken too seriously. The contaminant has been detected in approximately 2,000 drinking water wells across 52 out of 58 California counties, putting an estimated 33 million Californians at risk. This includes wells serving schools and even hospitals. It is for this reason that the state legislature in 2001 passed SB 351 (Ortiz), which requires the state to determine the extent of hexavalent chromium contamination in our waters and to "establish a primary drinking water standard for hexavalent chromium on or before January 1, 2004."

Clearly, California is in violation of its own law since we do not yet have an enforceable drinking water standard for hexavalent chromium. However, with the release of this draft PHG, we have taken an important step toward protecting the millions of Californians exposed to this toxic substance every day. The technologies exist today to both detect and treat hexavalent chromium below the proposed Public Health Goal. It is imperative that OEHHA move quickly to finalize this part of the process and for the Department of Public Health to expedite the development of a health-protective drinking-water standard. This will not only

protect our own state residents, but it will lead the nation in protecting public health, especially for vulnerable populations such as children, the elderly, and pregnant women.

Sincerely,

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cc: Dr. Joan Denton, Dr. George Alexeef