



Board of Directors
Dr. Thomas R. LaHue, *President*
Bruce Daniels, *Vice President*
Dr. Don Hoernschemeyer
Dr. Bruce Jaffe
Daniel F. Kriege

Laura D. Brown, *General Manager*

October 27, 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

Subject: Draft Public Health Goal for Hexavalent Chromium (aka Chromium 6) in Drinking Water

To Whom It May Concern:

The Soquel Creek Water District (SqCWD) is a county water district that provides potable water service and groundwater resource management within Santa Cruz County. The SqCWD serves a population of about 50,000 through approximately 15,300 service connections in four service subareas. The SqCWD currently receives 100 percent of its water from groundwater aquifers in the Soquel-Aptos Groundwater Basin. These aquifers are located within two geologic formations that underlie the SqCWD service area. Approximately 35% of SqCWD's water supply is from the Aromas Red Sands (Aromas) aquifer, which provides water for the communities of Seascape, Rio Del Mar and La Selva Beach.

In 2001, the SqCWD completed testing for chromium 6 as directed by the Department of Health Services (now California Department of Public Health). The District was among the first 25% of the water systems in the State to complete the chromium 6 testing. Chromium 6 has been detected in all six of SqCWD's production wells completed in the Aromas Red Sands aquifer, at levels ranging from 6-18 ppb in four wells serving portions of Aptos, Rio Del Mar and Seascape, and at levels from 31 to 38 ppb in two wells serving La Selva Beach and Cañon del Sol. A source assessment commissioned by SqCWD concluded that the chromium 6 in the Aromas Red Sands aquifer is naturally occurring. The SqCWD could lose 35 percent of its water supply if treatment to a level below the MCL is infeasible. Four of the affected wells are in areas where there is no sanitary sewer system, so treatment is more of a challenge.

SqCWD is committed to protecting our customers from any harmful health effects caused by contaminants in our water supply. The District's Board of Directors has openly discussed hexavalent chromium in the SqCWD's drinking water since 2001, hosting an expert panel presentation where Dr. Robert Howd and Dr. Bruce Macler, along with other experts, addressed SqCWD customers about the health risks associated with hexavalent chromium in drinking water.

Michael Baes
California Environmental Protection Agency
October 27, 2009
Page 2

We are concerned that the human carcinogenicity of low levels of chromium 6 in drinking water has not yet been clearly established with a significant body of solid scientific evidence. We request that the existing technical support documents and scientific studies that served as a basis for establishing the current draft public health goal for Chromium 6 be subjected to separate and independent external peer review before the final PHG is established. This will provide assurance that the public health goal and subsequent regulatory limits for chromium 6 are governed by good science.

Thank you for considering our input on this matter.

Sincerely,
SOQUEL CREEK WATER DISTRICT

A handwritten signature in cursive script, appearing to read "Thomas LaHue", written in black ink.

Dr. Thomas LaHue
Board President

Cc: Central Water District
City of Watsonville Public Works and Utilities Department
Association of California Water Agencies