



SAN FRANCISCO PUBLIC UTILITIES COMMISSION
WATER QUALITY DIVISION

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October 21, 2009

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Pesticide and Environmental Toxicology Branch
Office of Environmental Health Hazard Assessment
1515 Clay Street, 16th Floor
Oakland, CA 94612

Subject: Comments on Proposed Public Health Goal for Chromium VI

Dear Sirs/Madam,

The San Francisco Public Utilities Commission (SFPUC) appreciates the opportunity to review and comment on the proposed Public Health Goal (PHG) for chromium VI. The SFPUC has a strong, well-established partnership with the San Francisco Department of Public Health on drinking water health issues. The comments below are a product of this partnership.

The PHG for chromium VI, as proposed by the Office of Environmental Health Hazard Assessment (OEHHA), is 0.06 ppb. We believe that the proposed PHG value does not rely on a substantially improved body of evidence than what was available when the PHG for total chromium was initially established in 1999. Our principal concern is that OEHHA has relied on the results of National Toxicology Program's 2007 study to derive the PHG for carcinogenic effects. Although this study found that chromium VI in drinking water was carcinogenic in mice and rats, there are unresolved questions about the applicability of these results to humans. It is well accepted that chromium VI is reduced to non-toxic chromium III in the human stomach, a transformation that does not occur in rodents.

While we acknowledge that there are few relevant results from epidemiologic investigations in humans, we remain concerned that the extrapolation of the results from the 2007 National Toxicology Program rodent study may not be defensible.

If you have any questions regarding this matter, please contact Manouchehr Boozarpour at (650) 652-3109.

Sincerely,

Andrew DeGraca, P.E.
Water Quality Division Director.

Cc: June Weintraub, SFDPH
Eddy So, WQD
Records Management, WQD
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