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Mr. Michael Baes, Comment Coordinator
Pesticide and Environmental Toxicology Branch
Office of Environmental Health Hazard Assessment
California Environmental Protection Agency
1515 Clay Street; 16th Floor
Oakland, California 94612

RE: Proposed Public Health Goal for Hexavalent Chromium in Drinking Water

Mr. Baes,

Thank you for the opportunity to comment on the public health goal (PHG) for hexavalent chromium in drinking water. I have read the comments provided by the scientists and environmental groups concerned with the establishment of a PHG for drinking water. What disturbs me more than anything in these comments are the constant reoccurring calls for delay. Some come right out and ask for a delay while others veil their stall requests as waiting on more study results. They often tout, "the public demands the best available science" and "additional studies and peer reviews are warranted"; "let's not rush to judgment here".

Rush to Judgment... are you kidding me? It was December 7, 1987 when PG&E first notified the State of California they had polluted the groundwater of scores of privately owned drinking water wells in Hinkley; their reckless action causing death and disease. It has been over eleven years since the movie was released bringing this issue national attention, and ten years this week since Senator Debra Ortiz introduced legislation instructing the state Department of Health Services to develop a recommended standard for chromium 6 in water by July 1, 2003, and to adopt a maximum-contaminant level beginning Jan. 1, 2004.

Industrial polluters have clearly hijacked the process. Hexavalent chromium is not naturally occurring; though industry lobbyists and their PR machines have done a great job making you believe it does. Hexavalent chromium is pollution; it is a legacy pollutant, discharged primarily from cooling towers and select industries that specifically use chrome salts like tanneries, chrome plating and wood products treatment. While the specialty industries are limited in location, try thinking about an industry that didn't have a cooling tower, they were used to air condition large office buildings, warehouses and studios.

PHGs are not regulatory requirements, but instead represent non-mandatory goals; they are however the first step in setting a safe drinking water standard. Using the criteria described above, PHGs are developed for use by the California Department of Public Health (DPH) in establishing primary drinking water standards (Maximum Contaminant Levels, or MCLs).

Fear not water utility service providers, PHGs are to be based solely on scientific and public health considerations, drinking water standards adopted by DPH are to consider economic factors and technical feasibility. Each primary drinking water standard adopted by DPH shall be set at a level that is as close as feasible to the corresponding PHG, with emphasis on the protection of public health.

In summary, I **STRONGLY SUPPORT** the Office of Environmental Health Hazard Assessment's Proposed Public Health Goal for Hexavalent Chromium in Drinking Water. Timing is of the essence, and no further delays can be tolerated by the consumer of drinking water in the great State of California.

Sincerely,

Erin Brockovich