



THE METROPOLITAN WATER DISTRICT
OF SOUTHERN CALIFORNIA

Office of the General Manager

February 11, 2011

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: Revised Draft Public Health Goal for Hexavalent Chromium in Drinking Water

Dear Mr. Baes:

The Metropolitan Water District of Southern California (Metropolitan) appreciates the opportunity to provide comments on the revised draft Public Health Goal (PHG) for hexavalent chromium (also known as chromium 6) in drinking water. Metropolitan, through its 26 member agencies, provides nearly half of the water used in Southern California. Several of these agencies have groundwater supplies impacted from natural occurrence of chromium 6 or from anthropogenic sources.

The PHG will be the foundation for developing a drinking water Maximum Contaminant Level (MCL) for chromium 6 in California. Conventional drinking water treatment processes do not effectively remove this contaminant, and very costly specialized technologies still must be demonstrated as best available treatment. In addition, low-level detection methodologies have not been validated. Therefore, it is critical that the PHG be set at a level that properly considers the best available data so that regulatory standards have a scientifically credible basis and financial resources are appropriately used to protect against real risks to human health.

Draft PHG Report Development Process

The two previous releases of draft PHG reports for chromium 6 by OEHHA met with opposition by stakeholders concerned with the proposed level. Each of these occasions led to external scientific peer reviews of the OEHHA report and a lower PHG of 0.06 ppb was subsequently issued. Metropolitan supported an effort by the Association of California Water Agencies (ACWA) to request an external peer review of the revised draft PHG of 0.06 ppb. OEHHA ultimately issued its current revised draft PHG of 0.02 ppb, citing updated information regarding sensitive sub-populations. Metropolitan requests clarification on whether the revision was based

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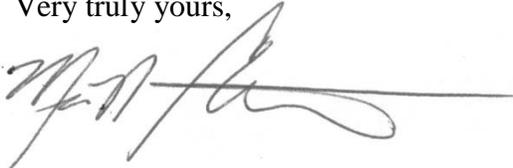
in response to the peer review and public comments, or if OEHHA was concurrently considering their own 2009 report regarding effects of early in life exposures to chromium 6.

Consideration of Available Human Health Risk Assessment Data

Metropolitan shares some concerns raised by ACWA regarding the National Toxicology Program (NTP) study that was used by OEHHA in developing the draft PHG. ACWA is preparing detailed comments for OEHHA's consideration. Moreover, Metropolitan understands that there are studies currently in progress (and scheduled to be completed in the summer of 2011) that may provide critical information on the mode of action and carcinogenicity of orally ingested chromium 6. Accordingly, Metropolitan requests that OEHHA thoroughly evaluate the findings of these studies as part of establishing a final PHG that will be used by the California Department of Public Health to set its MCL.

Metropolitan supports the work of OEHHA in developing appropriate risk assessments for all drinking water contaminants and trusts that through the established regulatory approach California will ultimately set a protective public health standard for chromium 6 in drinking water based on the best available scientific data. We also recognize the complexity of extrapolating data to predict potential human health risks and greatly appreciate this opportunity to provide input on the proposed regulatory determination for chromium 6 and ask that OEHHA carefully consider these comments. Please contact me at (213) 217-5696 if you have any questions, or if I can provide additional information.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Mic Stewart', with a long horizontal flourish extending to the right.

Mic Stewart, PhD
Manager, Water Quality Section