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Pesticide and Environmental Toxicology Branch  
Office of Environmental Health Hazard Assessment  
California Environmental Protection Agency  
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Attn: PHG project.

Dear Mr. Baes:

On behalf of the Safe Drinking Water Committee of the California-Nevada Section of American Water Works Association (CA-NV AWWA), I am submitting the following comment on the Public Health Goal (PHG) for hexavalent chromium.

In the calculation of the PHG for hexavalent chromium, an aggregate uncertainty factor of 3000 is applied, the maximum recommended by the California's Risk Assessment Advisory Committee and the U.S. Environmental Protection Agency. CA-NV AWWA recommends that the uncertainty factors should be clearly stated in the summary of the document as following:

### SUMMARY

The Office of Environmental Health Hazard Assessment (OEHHA) is proposing a Public Health Goal (PHG) for hexavalent chromium of 0.02 parts per billion (ppb) or micrograms per liter ( $\mu\text{g/L}$ ) in drinking water. OEHHA has reviewed the available data on the toxicity of hexavalent chromium and has identified the proposed PHG level as protective against all identified toxic effects from both oral and inhalation exposure to hexavalent chromium that may be present in drinking water. **To protect public health, the PHG for hexavalent chromium included an aggregated uncertainty (safety) factor of 3000.**

The uncertainty factors are a series of safety factors applied in the process of calculating a PHG. Although there may be some scientific basis for these uncertainty factors, these are generally safety factors applied to protect public health. With the uncertainty factor clearly stated in the first paragraph of the PHG document, the document will provide a fair and balanced view of the PHG and give the reader a feeling for whether the science is currently available to set a reasonable PHG.

CA-NV AWWA appreciates the opportunity to provide our comment.

Sincerely,

David Chang, Ph. D., P. E.  
Chair, Safe Drinking Water Act Committee  
CA-NV Section, AWWA  
Vice President, Environmental Quality  
Golden State Water Company