



Golden State
Water Company
A Subsidiary of American States Water Company

February 14, 2011

Michael Baes (mbaes@oehha.ca.gov)
Pesticide and Environmental Toxicology Branch
Office of Environmental Health Hazard Assessment
California Environmental Protection Agency
1515 Clay St., 16th floor
Oakland, California 94612

Attn: PHG project

Dear Mr. Baes:

On behalf of Golden State Water Company (GSWC), I am submitting the following comment on the Public Health Goal 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. GSWC recommends that the uncertainty factors should be clearly stated in the summary of the document as follows:

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. **Due to the extrapolation between species, the short duration of the studies referenced, the limited available data and to protect sensitive human sub-population, 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 will give the reader a feeling for whether the science is currently available to set a reasonable PHG.

GSWC appreciates the opportunity to provide our comment.

Sincerely,

A handwritten signature in blue ink, appearing to read 'D. Chang', with a stylized flourish at the end.

David Chang, Ph. D., P. E.
Vice President, Environmental Quality
Golden State Water Company