



Public Utilities Department
Administration

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

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

Dear Mr. Baes:

The City of Riverside appreciates the opportunity to comment on the proposed public health goal (PHG) for hexavalent chromium in drinking water. The City of Riverside is the largest City in inland southern California, serving approximately 300,000 customers through 63,500 water service connections, within a service area of 75 square miles.

Riverside is an active member of the Association of California Water Agencies, (ACWA). We fully support the comments submitted by ACWA regarding the proposed hexavalent chromium PHG, and incorporate them herein to this comment letter by reference. In addition, we have the following comments regarding the proposed hexavalent chromium PHG.

Draft PHG Report Development Process

The two previous releases of the draft PHG reports for hexavalent chromium 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. Riverside supported an effort by 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. Riverside requests clarification on whether the revision was based 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 hexavalent chromium.

Consideration of Available Human Health Risk Assessment Data

ACWA is preparing detailed comments for OEHHA's consideration regarding the National Toxicology Program (NTP) study that was used by OEHHA in developing the draft PHG. Riverside supports

ACWA's comments and respectfully requests that OEHHA review these comments carefully. Moreover, Riverside 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 hexavalent chromium. Accordingly, Riverside requests that OEHHA thoroughly evaluate the findings of these studies before establishing a final PHG that will be used by the California Department of Public Health to set its MCL.

Balancing Risks

Recent information received from the USEPA indicates that oxidants such as chlorine, ozone, or chloramine used in drinking water treatment processes transform trivalent chromium to hexavalent chromium in potable water distribution systems. The interaction between trivalent chromium and disinfectants creates a similar situation that water suppliers encounter with disinfection and the disinfection byproducts formed from the water treatment process. As with disinfectants and disinfection byproducts, water suppliers are faced with balancing the risk from microbial pathogens.

To our knowledge the PHG does not include a risk characterization of the microbial risk related with current disinfection practices compared to the health risk associated with the conversion of trivalent chromium to hexavalent chromium. Has OEHHA considered this risk assessment for the proposed hexavalent chromium PHG? If not, how will these challenges be addressed in the current regulatory framework?

Riverside 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 hexavalent chromium in drinking water based on the best available scientific data. Please contact me at (951) 826-5780 if you have any questions, or if I can provide additional information.

Respectfully,



Kevin S. Milligan, P.E.
Utilities Assistant General Manager - Water