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California Environmental Protection Agency
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Subject: Draft Public Health Goal for Hexavalent Chromium in Drinking Water

To Whom It May Concern:

The Central Water District (CWD) appreciates the opportunity to comment on the draft public health goal (PHG) for hexavalent chromium in drinking water. CWD provides potable water service and groundwater resource management within Santa Cruz County. The District receives 100% of its water from groundwater aquifers in the Soquel-Aptos Groundwater Basin. These aquifers are located within two geologic formations that underlie the CWD service area. Approximately 90% of the District's water supply comes from the Aromas Red Sands (Aromas) aquifer.

All three of CWD's production wells in the Aromas Red Sands aquifer had detected amounts of chromium 6, at levels ranging from 4.3 to 11.0 parts per billion (ppb).

OEHHA's draft PHG of 60 parts per trillion (ppt) was based largely on the findings of a recent National Toxicology Program (NTP) study that concluded there is sufficient data to classify hexavalent chromium as a carcinogen through the oral route of exposure. The researchers reached this conclusion through selected evidence that hexavalent chromium, when ingested in very high doses, causes cancer of the oral cavity and small intestine in rats and mice. CWD is concerned that the NTP study and other referenced studies are too limited in their examination of the human carcinogenetic effect of hexavalent chromium in drinking water.

According to the Association of California Water Agencies (ACWA), the administered doses in the NTP study are so large that they easily overwhelmed the reductive capacity of both the oral cavity and the stomach in the rodents. This is especially significant as the NTP study did not find excess cancers at lower doses in both rats and mice. Equally important, the stomach composition of humans and rodents is very different, with humans having a much more sophisticated digestive process.

Although we recognize all the efforts at research made to date, the NTP study and other referenced studies do not address, for example, the effects of prescription medications and over-the-counter antacids on gastric juices.

The CWD strongly supports additional scientific studies to validate or refute the carcinogenicity of hexavalent chromium before establishing a final PHG that will be used by the California Department of Public Health to set its maximum contaminant level (MCL).

Thank you for considering our input on this matter.

Sincerely,

CENTRAL WATER DISTRICT

Christy Marani

Christy Marani
Board President