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November 2, 2009

Mr. Michael Baes
Attn: PHG Project
Pesticide and Environmental Toxicology Branch
Office of Environmental Health Hazard Assessment
1515 Clay St., 16th floor
Oakland, California 94612

Re: Comments on and Request for External Peer Review of "Proposed Public Health Goal for Hexavalent Chromium in Drinking Water"

Dear Mr. Baes:

We write on behalf of Honeywell International Inc. ("Honeywell") with regard to the "Proposed Public Health Goal for Hexavalent Chromium in Drinking Water" ("Draft PHG"), released by the Office of Environmental Health Hazard Assessment ("OEHHA") on August 20, 2009. On behalf of Honeywell, an "interested person," we also request under California Health & Safety Code Section 116365(c)(3)(D) that OEHHA submit the revised risk assessment to external scientific peer review before its release for the 30-day comment period.

Honeywell is committed to protecting health and the environment. We also believe that decisions about chemical risks and cleanup goals must be based on sound science. OEHHA should revise the Draft PHG to reflect sound science before finalizing a PHG. An external peer review of the revised Draft PHG will be necessary due to widespread concern in the scientific, public health, and water supply communities about its scientific validity.

OEHHA should undertake a rigorous review of the scientific literature on hexavalent chromium and prepare a revised draft PHG that is technically supportable and complies with applicable statutory requirements and United States Environmental Protection Agency cancer guidelines. Thus, we formally request OEHHA "to submit the risk assessment to external scientific peer review in a manner substantially equivalent to the external scientific peer review process set forth in [California Health & Safety Code] Section 57004," as required by California Health & Safety Code Section 116365(c)(3)(D). We specifically request that this be in accordance with the California Environmental Protection Agency's peer reviewer selection process and with a certification of no conflict of interest.

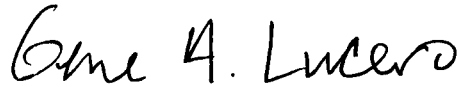
As also set forth in Section 116365(c)(3)(D), we are ready to enter into an enforceable agreement with OEHHA within fifteen calendar days of making this request to fully reimburse

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OEHHA for costs associated with conducting the external scientific peer review. Finally, we note that our request is timely, as it is being made within fifteen calendar days of October 19, 2009, the date that the public workshop on the Draft PHG was completed.

If you have any questions, please contact me at +1.213.891.8332. Thank you for your consideration of our comments and our request for external peer review.

Best regards,

A handwritten signature in black ink that reads "Gene A. Lucero". The signature is written in a cursive, slightly slanted style.

Gene A. Lucero
of LATHAM & WATKINS LLP

cc: Joan Denton, Ph.D., Director
Office of Environmental Health Hazard Assessment