



July 25, 2011

The Honorable Lisa Jackson
Administrator
United States Environmental Protection Agency
Ariel Rios Building
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Re: Peer Review Panel on Draft *Toxicological Review of Hexavalent Chromium*: In Support of Summary Information on the Integrated Risk Information System

Dear Administrator Jackson,

Hexavalent chromium (Cr(VI)) in drinking water has become an issue of increasing interest over the past decade. During that period, the U.S. Environmental Protection Agency (EPA) has twice reviewed all existing drinking water regulations and twice determined not to revise the total chromium standard in recognition that important scientific questions were unanswered. These questions – and a drinking water standard based on the answers to them – could have significant impacts on drinking water systems and the public.

The American Water Works Association (AWWA), National Association of Water Companies (NAWC), National Rural Water Association (NRWA), and Association of Metropolitan Water Agencies (AMWA) strongly recommend that the EPA consider relevant forthcoming health effects research as part of the current Cr(VI) risk assessment. Specifically, research that is being conducted by 12 institutions and coordinated by ToxStrategies with funding by the American Chemistry Council is currently nearing completion, and may provide important new information to inform the Agency's toxicological review.

Administrator Jackson

July 25, 2011

Page 2

On May 12, a majority of members of an external peer-review panel on the *Draft Toxicological Review of Hexavalent Chromium*, organized through the Integrated Risk Information System (IRIS) program, recommended significant revisions to the current draft review and the inclusion of the ToxStrategies research. These panel members found that the ToxStrategies research is of high quality and important in helping to bridge widely acknowledged gaps in the available science. In particular, it will inform the toxicology of low-dose exposures and the ability of the digestive system to reduce Cr(VI) to Cr(III). While the peer-review panel did not seek consensus, both the individual pre-meeting comments and the workshop discussions demonstrated broad support for incorporation of this research in the final risk assessment.

We appreciate the need for timely decision-making, and also believe that critical decisions should be informed by the best information available. With the ToxStrategies project near completion, a decision to include the research in the *Toxicological Review* would have only a very limited impact on the IRIS process schedule. Including this research in the IRIS process may also prevent lengthy and costly delays should EPA determine the need for a new drinking water standard. The IRIS program is not legally bound to include the ToxStrategies research, but the Office of Water (OW) would be required to consider it later. The resulting second health effects analysis, while feasible, would not be an efficient use of the agency's limited resources. Further, the existence of multiple, possibly different, health effects documents from the same agency could lead to confusion among the drinking water systems, local elected officials and the public.

For these reasons, we urge the agency to integrate this new health effects data into the IRIS *Draft Toxicological Review of Hexavalent Chromium*.

The mission of our associations and our member utilities is to protect public health and to provide safe and sufficient water for all. EPA and community water systems share a common belief that risk management decisions for drinking water should be based on the best available science. A regulatory development process in which science is the driver ensures that the public's money is effectively used to reduce risk and improve public health.

Administrator Jackson
July 25, 2011
Page 3

If you have any questions about this matter, please feel free to call Steve Via in AWWA's Washington D.C. office.

Best regards,



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