



RON CHAPMAN, MD, MPH
Director

State of California—Health and Human Services Agency
California Department of Public Health



EDMUND G. BROWN JR.
Governor

June 27, 2011

Harold Singer
Executive Officer
California Regional Water Quality Control Board
Lahontan Region
2501 Lake Tahoe Blvd.
South Lake Tahoe, CA 96150

Dear Mr. Singer:

COMMENTS ON DRAFT CLEANUP AND ABATEMENT ORDER, PACIFIC GAS AND
ELECTRIC COMPANY HINKLEY COMPRESSOR STATION,
SAN BERNARDINO COUNTY

The California Department of Public Health (CDPH) appreciates the opportunity to comment on the draft Amended Cleanup and Abatement Order (Order) for the Pacific Gas and Electric Company's (PG&E) Hinkley Compressor Station in San Bernardino County (Order No. R6V-2011-0005A1). CDPH supports the goals of the State Water Resources Control Board and Regional Boards to clean up contaminated waters of the state covered by the California Water Code; however, we would like to express our concern with referencing the draft chromium-6 Public Health Goal (PHG) in the draft Order as the trigger for providing replacement water.

The draft Order would require PG&E to provide replacement water for wells within one-mile of the current plume boundary in San Bernardino County with detected concentrations of chromium-6 greater than the draft Public Health Goal (PHG) of 0.02 parts per billion (ppb). The Lahontan Water Board's finding in the draft Order is that the draft PHG level "is an appropriate standard to rely on to protect the public from contaminated drinking water, despite the fact that it has not been formally promulgated." CDPH thinks it is premature, and has potentially far overreaching implications to domestic water supply wells in the state, to use the draft PHG for this purpose.

The draft PHG for chromium-6 in drinking water has not yet been finalized by the Office of Environmental Health Hazard Assessment (OEHHA) of the California Environmental Protection Agency. Presently, there is no regulatory standard for chromium-6 in

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drinking water and no laboratories certified by CDPH's Environmental Laboratory Accreditation Program (ELAP) for analytical reporting levels identified within the draft Order. However, after the chromium-6 PHG is final, CDPH will proceed with setting a primary drinking water maximum contaminant level as well as formally reviewing the Detection Limit for Purposes of Reporting (DLR) and associated laboratory certification for approved or modified analytical method(s).

Chromium-6 has been detected in multiple areas of the state at levels exceeding the draft PHG and it is believed to be naturally occurring at many of these locations. Monitoring collected for the Unregulated Contaminant Monitoring Rule detected chromium-6 above the 1 ppb detection limit in approximately one-third of more than 7,000 drinking water sources sampled throughout the state. Additional data including more recent chromium-6 monitoring can be found on our website at:
<http://www.cdph.ca.gov/certlic/drinkingwater/Pages/Chromium6sampling.aspx>

CDPH's priority continues to be protecting public health and to assure the delivery of safe drinking water to all Californians served by over ~7,500 public water supply systems in the state. We look forward to working with you on addressing the issues in and around the Hinkley area.

If you have any questions, please contact Heather Collins, Regional Engineer, at (909) 383-4328 or heather.collins@cdph.ca.gov.

Sincerely,



Leah Godsey Walker, P.E., Chief
Division of Drinking Water and Environmental Management

cc: San Bernardino County Department of Environmental Health Services
Office of Environmental Health Hazard Assessment