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April 16, 2010

Office of Environmental Information (OEI) Docket
(Mail Code: 2822T)
U.S. Environmental Protection Agency
1200 Pennsylvania Ave., NW.
Washington, DC 20460

Re: Peer Review Draft, Integrated Risk Information System (IRIS) Toxicological Review of Inorganic Arsenic (Docket ID No. EPA-HQ-ORD- 2010-0123)

To Whom It May Concern:

ACWA is pleased to have the opportunity to comment on the United States Environmental Protection Agency's (EPA) February 19 release of the Peer Review Draft Toxicological Review of Inorganic Arsenic (External Review Draft).

As the largest coalition of public water agencies in the country, ACWA consistently advocates for risk assessments based on sound science that will ultimately protect human health and provide a safe and reliable water supply for Californians. While we are encouraged that EPA is actively addressing issues and contaminants that may affect drinking water quality, it is equally as important to ensure sufficient research has been conducted to inform the most comprehensive and relevant assessments. In particular, when EPA addresses drinking water contaminants that are often ubiquitous or found at low levels, close attention must be paid to potential uncertainties that could affect the results of a risk assessment.

These uncertainties are apparent in the subject assessment which still lacks the data needed to understand the mode of carcinogenic action for inorganic arsenic resulting in a dependence on a default linear model attempting to explain the risk at low dose exposures. Applying new statistical equations to the same old data from 42 villages in Southwest Taiwan will not reduce the inherent uncertainties associated with a dataset that is not representative of conditions affecting the U.S. population.

ACWA believes that to quantify the risks involved with exposure to arsenic in drinking water, EPA must have access to a robust set of data derived from sources within the United States instead of relying largely on the Taiwanese dataset. There exists a great need for conducting this additional research that will appropriately inform an arsenic risk assessment and we support EPA in efforts to secure funding or other resources for this purpose.

ACWA also believes EPA's research agenda needs to include a comprehensive assessment of the costs to develop and implement treatment technologies to remove inorganic arsenic from drinking water. These assessments need to identify and incorporate real-world implementation costs driven by State and local requirements that are currently not considered when evaluating national treatment costs. Informed risk management decisions depend on completing this research well in advance of developing national drinking water standards.

ACWA's 450 public agency members are responsible for 90% of the water delivered to communities, farms and businesses in California. We are advocates for human health and sound science in the development of drinking water regulations and strongly encourage EPA to gather additional research and information when addressing the very important issue of arsenic in drinking water.

Please feel free to call me at 916-441-4545 or Steve Bigley, chair of ACWA's Arsenic Workgroup, at 760-398-2651, if you have questions or would like additional information.

Sincerely,

Danielle Blacet
Regulatory Advocate