



## SANTA CRUZ COUNTY GROUP

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February 8, 2018

To: EPA

**Subject: Proposed Withdrawal of Certain Federal Water Quality Criteria Applicable to California: Lead, Chlorodibromomethane, and Dichlorobromomethane Docket ID: EPA-HQ-OW-2017-0303**

The Sierra Club does not approve of the EPA proposal to amend federal regulations to withdraw certain water quality criteria for lead, chlorodibromomethane, and dichlorobromomethane in California.

The proposal to increase the maximum concentration of chlorodibromomethane to 4.9 ug/L from the EPA standard of 0.401 ug/L is not proven to be safe. The proposal to increase the maximum concentration of dichlorobromomethane to 16 ug/L from the EPA standard of 0.56 ug/L also has unknown risks. Both of these changes are more than a tenfold increase over the current standard.

The proposed rule would allow a maximum concentration of lead 103 ug/L (ppb) for a total hardness of 100 mg/L calcium carbonate (ppm), which is almost twice the EPA's value of 65 ug/L. Californians do not deserve lower quality water and should meet or exceed the EPA's current standard. The California continuous concentration (at total hardness 100 mg/L) is 17.6 ug/L versus EPA's value of 2.5 ug/L

The risks, including combined risks, of increasing the maximum concentration of these chemicals is unknown and the precautionary principle urges that we retain the lower levels of concentration in order to protect public health.

Sincerely,

Greg McPheeters  
Chair, Santa Cruz Group, Sierra Club