



## SAN FRANCISCO PUBLIC UTILITIES COMMISSION

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March 11, 2009

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Lisa Jackson  
US Environmental Protection Agency Administrator  
USEPA Headquarters  
Ariel Rios Building  
1200 Pennsylvania Avenue, N. W.  
Mail Code: 1101A  
Washington, DC 20460

RE: Chloramine Disinfectant Health Research Needs

Dear Administrator Jackson:

The San Francisco Public Utilities Commission (SFPUC) changed its distribution system disinfectant from chlorine to chloramine in February 2004 to comply with the Federal drinking water regulations, specifically Stage 1 and 2 Disinfectants and Disinfection Byproducts Rules. Since 2004, a group of customers in our service area has expressed concerns about the use of this USEPA-approved disinfectant and attributed a number of health problems to its use.

In response to concerns raised by these customers, SFPUC jointly with the San Francisco Department of Public Health (SFPDH) have completed the following:

- analyzed water quality performance data,
- conducted a dermatitis investigation,
- reviewed the scientific literature,
- met with concerned customers,
- consulted with medical, public health and chemistry experts,
- engaged with the appropriate state and federal regulatory agencies,
- provided annual updates to the SFPUC Commission,
- developed detailed information and posted on-line at [http://sfwater.org/mto\\_main.cfm/MC\\_ID/13/MSC\\_ID/166/MTO\\_ID/399](http://sfwater.org/mto_main.cfm/MC_ID/13/MSC_ID/166/MTO_ID/399),
- raised concerns in professional venues, and
- have encouraged additional research.

Our conclusion is that chloramination in the SFPUC system met its objectives, ensuring regulatory compliance without causing any adverse water quality impacts or health impacts on a population level. However, customer's concerns have persisted. Recently, the customer's group has worked with the SFPUC Citizens' Advisory Committee to develop a resolution urging the USEPA to "conduct scientific testing of

the immediate, acute, and long-term effects of chloramine and other practical alternatives, when used [...] as a secondary water disinfectant” (resolution attached).

We respectfully request the USEPA to take into consideration the aforementioned customer’s concerns and conduct comparative studies on the effects of water disinfectants (chlorine, chloramine, and chlorine dioxide) on human exposure. Additionally, it would be valuable for USEPA to provide guidance to utilities on how to respond to customer health concerns regarding approved drinking water disinfectants and inquiries regarding removal of the disinfectants in a home setting.

If you have any questions regarding this request, please contact our Water Quality Director, Andrew DeGraca, at 650-652-3102.

Regards,



Ed Harrington  
General Manager

Attachment:

November 17, 2008 SFPUC Citizen Advisory Committee’s Resolution

cc: PUC Commissioners  
Michael Carlin, SFPUC, Deputy General Manager  
Andrew DeGraca, SFPUC, Water Quality Director  
Dr. June Weintraub, SFDPH, San Francisco Department of Public Health  
Catherine S. Ma, PE, CADPH, California Department of Public Health  
Dr. Bruce Macler, USEPA Region 9  
Jennifer Clary, SFPUC Citizen Advisory Committee



**SFPUC Citizens' Advisory Committee  
Water Subcommittee**

**Resolution on Chloramine Disinfection**

*Passed by the Water Subcommittee on October 22, 2008*

*Passed by the Full CAC on November 17, 2008*

WHEREAS, disinfection of public water supplies is acknowledged to be one of the most significant public health accomplishments of all time; and

WHEREAS, since February of 2004 the San Francisco Public Utilities Commission (SFPUC) has used chloramine as the secondary disinfectant for drinking water; and

WHEREAS, since February of 2004, several hundred customers of SFPUC chloraminated water have reported adverse human health effects including rashes, respiratory problems and digestive problems; and

WHEREAS, no agency, including the United States Environmental Protection Agency (USEPA), has done scientific studies to determine whether chloramine, when used as a secondary disinfectant, might cause adverse skin, respiratory, or digestive effects in human beings; and

WHEREAS, there have not been epidemiological or other scientific studies on the dermal, respiratory, and digestive effects of human exposure to chloraminated drinking water, even as the use of chloramine for secondary disinfection is increasing in the United States; and

BE IT RESOLVED that the SFPUC Citizens Advisory Committee urges the SFPUC and the San Francisco Department of Health (SFDPH) to petition the United States Environmental Protection Agency (USEPA) to conduct scientific testing of the immediate, acute, and long-term health effects of chloramine and other practical alternatives, when used as used as a secondary water disinfectant.