



California Department of Public Health
MEMORANDUM

DATE: June 20, 2014

TO: All Public Water Systems

FROM: David Mazzer, Ph.D., Acting Chief
Division of Drinking Water and Environmental Management
1616 Capitol Avenue
Sacramento, CA 95899-7413

SUBJECT: **STATE ADOPTION OF A HEXAVALENT CHROMIUM MCL**

The California Department of Public Health (CDPH) has been in the process of adopting a hexavalent chromium maximum contaminant level (MCL) for drinking water. The process is now complete. **On July 1, 2014, a California MCL of 0.010 mg/L for hexavalent chromium becomes effective.** The new regulations have been incorporated into the CDPH's on-line regulation book located here:
<http://www.cdph.ca.gov/certlic/drinkingwater/Pages/Lawbook.aspx>.

Note: This memorandum serves to announce the adoption of the new regulations, provide a general overview of the requirements, and provide responses to commonly asked questions. It is not intended to be a substitute for the actual regulations. If you have any questions regarding the content of this memo, please contact your local CDPH District Office.

1. What is California's hexavalent chromium MCL?

California's maximum contaminant level (MCL) for hexavalent chromium is 0.010 mg/L (10 µg/L).

2. What is the effective date of the hexavalent chromium MCL and to what entities does it apply?

California's hexavalent chromium MCL becomes effective on July 1, 2014. Public water systems (PWS) classified as community water systems and nontransient noncommunity water systems must comply with the new MCL.

3. What are the initial monitoring requirements for hexavalent chromium?

The regulations require an applicable PWS to initiate monitoring for hexavalent chromium within six months of the effective date. Therefore, on or before January 1, 2015, an applicable PWS must have monitored their drinking water sources for hexavalent chromium. A PWS with groundwater sources may use previous hexavalent chromium results to satisfy the initial monitoring requirement if monitoring took place no more than two years prior to the effective date, and an approved analytical method was used by a laboratory certified by California's Environmental Laboratory Accreditation Program (ELAP) to perform such an analysis. See #5 below and <http://www.cdph.ca.gov/certlic/labs/Pages/ELAP.aspx> for more information.

4. Can total chromium monitoring results be used in lieu hexavalent chromium?

Not for initial monitoring. However, for subsequent routine monitoring, total chromium results may be used in lieu of hexavalent chromium monitoring *if* the chromium results are less than the total chromium detection limit for reporting (DLR) of 10 µg/L.

5. What analytical test methods must be used?

To determine hexavalent chromium concentrations, Department-approved methods must be used. Currently, U.S. Environmental Protection Agency analytical methods 218.6 or 218.7 are approved by the Department and the analysis must be performed by laboratories that have been certified by the ELAP to perform the testing.

6. What happens if my initial hexavalent chromium monitoring result exceeds the hexavalent chromium MCL? In other words, how is compliance determined?

In general, a result exceeding the MCL triggers quarterly monitoring.¹ As with other inorganic contaminants with MCLs based on chronic health risks, compliance is determined by whether a running annual average of monitoring results exceeds the MCL. If a result exceeds the MCL, but is less than or equal to 100 µg/L, within 48 hours you must contact the Department's District Office (or Local Primacy Agency) that oversees your water system. If a result exceeds 100 µg/L, within 24 hours you must resample and contact the Department's District Office (or Local Primacy Agency) that oversees your water system. The Department's District Office will guide you through follow-up actions that must be taken.

7. What other requirements or revisions to the regulations were included in the hexavalent chromium MCL regulation package?

The establishment of a hexavalent chromium MCL required other revisions associated with the establishment of a hexavalent chromium MCL; including, health effects language, major sources of hexavalent chromium in drinking water language (i.e. man-made and naturally occurring), establishing a DLR for hexavalent chromium, identifying best available technologies, etc.

Aside from hexavalent chromium-related revisions, the regulations were revised as follows:

- Assembly Bill 938 (2011) revised section 116450 of the Health and Safety Code, establishing more stringent Tier 1 notification requirements. The regulations were revised in accordance with the new requirements. In addition, the regulations were revised to clarify that notices for Department review and approval are to be provided in English.
- Language was incorporated regarding total radium health effects and major sources of total radium in drinking water.
- Language for disinfection byproduct and disinfectant residual compliance was revised to assure compliance determinations are no less stringent than U.S. EPA's.

¹ See Sections 64432(g) and (h) for further details regarding options pertaining to confirmation sampling, reporting, and resulting follow-up compliance monitoring and actions.

In addition, various obsolete requirements were deleted and a number of nonsubstantive changes were made to correct grammar, punctuation, spacing, spelling, typographical errors, use of plural and upper/lower case, page numbers referenced in federal registers, as well as references to sections, subsections, and paragraphs, etc.