



State Water Resources Control Board
Division of Drinking Water

Hexavalent Chromium Compliance Plan Guidance

Background

The hexavalent chromium regulation requires Community and Nontransient-noncommunity (NTNC) water systems to conduct initial monitoring for hexavalent chromium within 6 months of the regulation’s effective date. The water system shall require their labs to use either EPA Method 218.6 or 218.7 for the analysis of hexavalent chromium in drinking water. Samples must be collected from groundwater and surface water sources before treatment.

MCL Exceedance Determination

If a single sample exceeds 10 ppb for hexavalent chromium, the water system must initiate quarterly sampling for that source. The quarterly samples should be taken in the same month (1st, 2nd, or 3rd) each quarter. The source has exceeded the hexavalent chromium MCL if the running annual average of quarterly samples is greater than 10 ppb.

In the Example Monitoring Data below, Well 1 has exceeded the MCL and triggered the requirement to submit a compliance plan when the water system is notified of the results of the fourth quarter sample. Up until the results of the 4th quarter sample were known, the average had a chance of being under the MCL. On the other hand, Well 2 exceeded the MCL in the first quarter because even if the remaining quarters were zero, the average would still be over 10 ppb.

Example Monitoring Data (ppb)

Sample Date	Quarter 1	Quarter 2	Quarter 3	Quarter 4
Well 1	10	12	12	11
Well 2	42	42	43	45

If a source exceeds the hexavalent chromium MCL before the applicable compliance date (see table below), the water system must submit a compliance plan to the Division of Drinking Water within 90 days of when the water system was notified, by the lab, of the result which caused them to exceed the MCL. If an exceedance occurs after a system’s compliance date, a compliance plan is no longer required, but the exceedance is considered a violation.

E. JOAQUIN ESQUIVEL, CHAIR | EILEEN SOBECK, EXECUTIVE DIRECTOR

Compliance Dates for the Hexavalent Chromium MCL

System Size (service connections)	Compliance Date
10,000 or more	October 1, 2026
1,000 to 9,999	October 1, 2027
Fewer than 1,000	October 1, 2028

Compliance Plan Requirements

The compliance plan must describe how the water system will return to compliance with the hexavalent chromium MCL within a reasonable timeframe. At a minimum, the compliance plan shall include:

1. The proposed method for complying with the hexavalent chromium MCL and if applicable, proposed pilot studies (e.g., removing the source from service, providing removal treatment, and blending):
 - Describe the proposed treatment facility and any pilot studies or other methods which were used to select the type of treatment being proposed.
 - Describe how the proposed treatment facility will be operated to ensure simultaneous compliance (i.e., hexavalent chromium along with corrosion control, DBPs compliance, etc.)
2. If the proposed compliance method requires construction the water system must submit dates for the following:
 - The date by which the system will submit to the State Board final plans and specifications for the proposed method of compliance
 - The anticipated date for commencing construction
 - The anticipated date for completing 100 percent of construction
3. If a new or modified treatment process is required, the anticipated date a Hexavalent Chromium Operations Plan will be completed and submitted to DDW. The plan must include the following:
 - Performance monitoring program
 - Describes how the treatment process will be monitored (water quality, pressure differential, flow rate, bed volumes treated, backwash frequency/duration, etc.) to ensure it is performing as designed.
 - Unit process equipment maintenance program
 - Describe the routine maintenance program the water system will carry out to ensure the proper operation of the proposed facility.
 - How and when each unit process is operated
 - Provide a detailed description of each unit process including how and when each unit process will be operated.

- Procedures used to determine chemical dose rates
 - Provide details of pilot studies or other means used to determine the proper treatment chemicals and dosages for effective hexavalent chromium reduction.
- Reliability features
 - Describe alarm setpoints, standby power, redundant treatment processes, automatic shutdown features, etc.
- Treatment media inspection program
 - If the treatment proposal includes a removal process, such as filtration, the compliance plan must describe how the water system will ensure the media is still effective through routine inspections. At a minimum, describe the frequency of inspections, the method of inspection and what to look for, and criteria that will be used to initiate media change out.

Once a Compliance Plan is submitted, the State Water Board's Division of Drinking Water will review it to ensure that it meets the minimum requirements, above.