

## State Water Resources Control Board

Division of Drinking Water

December 29, 2017

To: Community and Nontransient-Noncommunity Water Systems in California

Re: **STATE ADOPTION OF 1,2,3-TRICHLOROPROPANE MCL**

The purpose of this letter is to alert you to the new regulation adopted by the State Water Resources Control Board's Division of Drinking Water (DDW) establishing a maximum contaminant level (MCL), monitoring frequencies, and other requirements for 1,2,3-Trichloropropane (1,2,3-TCP). These regulations were filed with the Secretary of State and became effective on December 14, 2017. The establishment of this MCL is a key milestone in addressing a major drinking water issue in California.

Information in this letter is intended as an overview. You are encouraged to read the text of the new regulations and to review information on our web pages (listed below).

### **DDW Web Pages Related to 1,2,3-TCP**

1. Drinking Water Program main web page for 1,2,3-TCP:  
[https://www.waterboards.ca.gov/drinking\\_water/certlic/drinkingwater/123TCP.shtml](https://www.waterboards.ca.gov/drinking_water/certlic/drinkingwater/123TCP.shtml)
2. Drinking Water Program web page on the regulations established for 1,2,3-TCP:  
[https://www.waterboards.ca.gov/drinking\\_water/certlic/drinkingwater/SBDDW-17-001\\_123TCP\\_MCL.html](https://www.waterboards.ca.gov/drinking_water/certlic/drinkingwater/SBDDW-17-001_123TCP_MCL.html)

### **Effect of New Regulations**

The new regulations include the following:

1. The establishment of an MCL for 1,2,3-TCP of 0.000005 mg/L (5 parts per trillion (ppt)), and a Detection Level for Purposes of Reporting (DLR) of 5 ppt (Title 22, California Code of Regulations (22 Cal Code Regs.) § 64444 and § 64445.1).
2. Community and Nontransient-Noncommunity Water Systems (Water Systems) are required to monitor their sources for 1,2,3-TCP, comply with the 1,2,3-TCP MCL, and report all sampling results to DDW.
3. Water Systems may be allowed to use groundwater monitoring data meeting specific criteria and collected prior to the establishment of a new organic chemical MCL to satisfy some of the initial monitoring requirements for that MCL, if approved by DDW (22 Cal Code Regs. § 64445).
4. Granular Activated Carbon (GAC) has been identified as the Best Available Technology (BAT) for 1,2,3-TCP removal (22 Cal Code Regs. § 64447.4).
5. Water Systems that violate the 1,2,3-TCP MCL are required to use specific public notification (health effects) language (22 Cal Code Regs. § 64465).
6. Water Systems that detect 1,2,3-TCP must use specific Consumer Confidence Report language (22 Cal Code Regs. § 64481).

**Necessary Actions by Community and Nontransient-Noncommunity Water Systems**

The following provides additional detail on monitoring, reporting, and required actions in the event of a 1,2,3-TCP detection:

1. Water Systems must conduct initial monitoring in the quarter beginning in January, 2018 (i.e., January, February, and March). Initial monitoring consists of four calendar quarters of sampling for each source.
2. Results from groundwater samples collected during 2016 and 2017 may be used to satisfy initial monitoring requirements based on a written request from the Water System and approval by DDW. Up to three quarters may be substituted (22 Cal Code Regs. § 64445(i)).
3. Each individual source must be sampled. Composite samples are not allowed for 1,2,3-TCP since the DLR and the MCL are the same value (22 Cal Code Regs. § 64445(c)).
4. In the event of a detection of 1,2,3-TCP above the MCL, the Water System must contact the regulatory agency (i.e., DDW or Local Primacy Agency (LPA)) within 48 hours and conduct follow-up sampling as specified in regulation (22 Cal Code Regs. § 64445.1(c)(5)).
5. Existing regulations allow a Water System to request a waiver from the requirement to collect a complete set of four initial calendar quarters of monitoring. Requests for monitoring waivers must be made in writing to the DDW District Office or LPA. Unless you have obtained a waiver from the DDW District Office or LPA, initial monitoring will need to be conducted (22 Cal Code Regs. § 64445(d)).
6. Only laboratory methods meeting the DLR of 5 ppt will be accepted for compliance purposes. At this time, SRL 524M is the only laboratory method with a reporting level that is equal to or less than the DLR. The laboratory performing the analysis must be accredited by the Environmental Laboratory Accreditation Program. Please refer to the following link:  
[https://www.waterboards.ca.gov/drinking\\_water/certlic/drinkingwater/documents/123-tcp/srl524m-tcp.pdf](https://www.waterboards.ca.gov/drinking_water/certlic/drinkingwater/documents/123-tcp/srl524m-tcp.pdf)
7. Samples are to be collected following standard sampling procedure for organic chemicals, which includes:
  - Collecting samples as close as possible to the wellhead (for groundwater sources) or intake (for surface water sources) prior to chlorination or other treatment, and
  - Allowing groundwater sources to run for least 15 minutes prior to collection (22 Cal Code Regs. § 64445).

The DDW District Office or Local Primacy Agency is available to answer additional questions that you may have.

Sincerely,



Darrin Polhemus, Deputy Director  
Division of Drinking Water  
State Water Resources Control Board