



Regulatory Alert

TO: AWWA Member Utilities

FROM: AWWA Public Affairs

DATE: January 11, 2011

Who: U.S. Environmental Protection Agency
What: Guidance on Water System Monitoring for Hexavalent Chromium
When: Posted Today

The U.S. Environmental Protection Agency (USEPA) today announced its guidance to drinking water systems on monitoring for hexavalent chromium (Cr-VI).

USEPA is strongly encouraging water systems to consider its recommendations, although they are not mandatory. The current total chromium Safe Drinking Water Act standard will not be affected by the announcement.

Water systems that anticipate monitoring for Cr-VI can find EPA's guidance at: <http://water.epa.gov/drink/info/chromium/guidance.cfm>. Key elements of the guidance include:

- Analytical method for Cr-VI is EPA Method 218.6.
- Characterizing occurrence involves sampling untreated water at the intake/well locations, at entry points to the distribution system, and at locations within the distribution systems.
- Understanding occurrence may involve sampling over time (e.g. capture semi-annually for groundwater sources and quarterly for surface water sources.)
- Instructions for finding a laboratory with the capability to provide Cr-VI analysis.

Because the action stems directly from Administrator Lisa Jackson's Dec. 22 response to an Environmental Working Group (EWG) report, AWWA anticipates these recommendations will be of interest to local and national media.

Understanding of the health risks associated with low-level Cr-VI is still developing. Utilities that move forward with monitoring should consider a communications plan as part of their new program. AWWA will provide utilities with more information on this subject to assist them with public communications.

Background

Currently, USEPA has a maximum contaminant level (MCL) for total chromium (100 ppb), but does not have a separate MCL for Cr-VI. However, USEPA is in the process of conducting an evaluation of

carcinogenicity via oral ingestion for Cr-VI. The evaluation is currently in external peer review and is scheduled to be completed in late 2011. Additionally, in 2009, California's Office of Environmental Health Hazard Assessment (OEHHA) proposed a Public Health Goal (PHG) of 0.06 ppb (or 60 ppt). On December 31, 2010 OEHHA proposed lowering its initial PHG for Cr-VI to 0.02 ppb.

As previously mentioned, USEPA's National Center for Environmental Assessment is preparing a toxicological review of Cr-VI. The EPA analysis relies on the same critical study as OEHHA's proposed PHG; EPA's analysis is now in external peer-review and is available at http://cfpub.epa.gov/ncea/iris_drafts/recordisplay.cfm?deid=221433.

See recent AWWA communications regarding Cr-VI:

December 18 advisory on Environmental Working Group Report

http://www.awwa.org/files/GovtPublicAffairs/AdvisoriesAlerts/121710ChromiumIWEWG_1292616245303.pdf

December 20 AWWA Statement on EWG Report

<http://www.awwa.org/files/GovtPublicAffairs/PressReleases/122010chromiumEWG.pdf>

December 22 Advisory on Administrator Jackson's Response to Senators on Cr-VI

<http://www.awwa.org/files/GovtPublicAffairs/AdvisoriesAlerts/122210ChromiumEPA.pdf>

Questions? Contact AWWA Government Affairs at (202) 326-6135, clane@awwa.org, or AWWA Public Affairs at (303) 734-3410, gkail@awwa.org.