



January 27, 2011

The Honorable Lisa Jackson  
Administrator  
United States Environmental Protection Agency  
Washington, DC 20460

Dear Administrator Jackson:

The Association of Metropolitan Water Agencies (AMWA) is an organization of the CEOs and directors of the largest publicly owned drinking water providers in the United States. Collectively, AMWA member utilities serve the drinking water needs of more than 130 million people.

AMWA is concerned about EPA's issuance of guidance to drinking water systems recommending enhanced monitoring for hexavalent chromium (Cr-VI) without:

- a clear understanding on proper analytical technique and whether the monitoring data will be valid given the method, as described in EPA's guidance, is not officially approved by the agency; and
- a context for what monitoring results mean within the regulatory framework or how they relate to public health concerns.

Of primary concern is that EPA's guidance refers to using California's certified laboratories to conduct Cr-VI analysis at a reporting level of 0.06 ppb and a holding time of up to five days. However, California's method is only approved for a reporting level at 1 ppb and a 24-hour holding time. California has not yet made a determination whether to revise its methods to align with EPA's recommendations (Attachment A). In addition, questions about proper sampling technique and sample preservation are not addressed in the guidance. Our members are interested in knowing if the data will be valid since the method described in the guidance is not officially approved by EPA. AMWA also would like to know whether EPA is planning to officially approve the modifications to EPA Method 218.6 (recommended in the guidance) and to set an official reporting level for this method.

It also would be helpful for EPA to disclose its timeframe for moving forward with the regulatory process outlined in the Safe Drinking Water Act (SDWA). The Agency has indicated that it is on an expedited timeline regarding revising the chromium standard but has not released a schedule. Specifically, our members would like to know EPA's timeline for:

- making a regulatory decision whether to revise the standard for total chromium (which EPA says is based on 100% of the compliance sample as Cr-VI) or develop a separate standard for Cr-VI; and
- proposing and finalizing a rule for chromium (or Cr-VI).

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Finally, as our members are very concerned about the issues outlined in this letter, AMWA would like to set up a meeting with you and members of our Board of Directors to further discuss these and other items related to chromium-VI in within the next two to three weeks. I look forward to hearing from you soon.

Sincerely,



Diane VanDe Hei

Executive Director

cc: Bob Perciasepe, EPA  
Nancy Stoner, EPA OW  
Cynthia Dougherty, EPA OGWDW


<http://www.cdph.ca.gov/certlic/drinkingwater/Pages/Chromium6.aspx>


(accessed Jan. 27, 2011)

# Chromium-6 in Drinking Water: MCL Update

Last Update: January 19, 2011

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**Announcements:** US EPA's [January 2011 recommendations for enhanced chromium-6 monitoring](#) refer public water systems to California laboratories, specifically to CDPH's [Environmental Laboratory Accreditation Program](#) (ELAP) and its [list of certified laboratories \(Excel\)](#). US EPA mentions that laboratories marked under "FOT 103" (Field of Testing 103) can be contacted and asked if they are certified for CA CDPH subgroup code 103.310, which is specific to EPA Method 218.6 for chromium-6.

To assist public water systems that may seek California laboratories, ELAP has provided a list of [laboratories certified for subgroup code 103.310 \(Excel\)](#).

**NOTE:** Public water systems outside of California should be aware that California's method currently uses a 1-ppb detection limit for purposes of reporting (DLR), and a 24-hour holding time. We are reviewing the DLR and holding time to determine whether our methods should be revised to align with US EPA's recommendations.