

CALIFORNIA WATER SERVICE
REPORT ON WATER QUALITY RELATIVE TO PUBLIC HEALTH GOALS
IN THE LIVERMORE WATER SYSTEM
JULY 1, 2022

BACKGROUND

Provisions of the California Health and Safety Code (Section 116470 [b]) specify that water systems serving more than 10,000 connections shall prepare a special report by July 1, 2022, if their water exceeds any Public Health Goals (PHGs) after each compliance period. PHGs are non-enforceable goals established by the Cal-EPA's Office of Environmental Health Hazard Assessment (OEHHA). The statute also requires that water suppliers use the Maximum Contaminant Level Goals (MCLGs) adopted by USEPA for constituents for which OEHHA has not adopted a PHG.

There are a few constituents that are routinely detected in water systems, at levels usually well below the drinking water standards, for which no PHG or MCLG has yet been adopted (e.g., Total Trihalomethanes). These constituents will be addressed in a future required report after a PHG has been adopted.

In accordance with the Health and Safety Code (reference 1), if a constituent was detected in the water system's supply during 2019, 2020, or 2021 at a level exceeding an applicable PHG or MCLG, it will be identified in this report. Additional information includes the numerical public health risk associated with the MCL, plus the PHG or MCLG; the category or type of risk to health that could be associated with each constituent; the best available treatment technology that could be used to reduce the constituent level; and an estimate of the cost to install that treatment if it is appropriate and feasible.

WHAT ARE PHGs?

PHGs are set by OEHHA, which is part of Cal-EPA, and are based solely on public health risk considerations. None of the practical risk-management factors that are considered in the rulemaking process by the USEPA or the California State Water Resources Control Board's (SWRCB) Division of Drinking Water (DDW) in setting drinking water standards, otherwise known as Maximum Contaminant Levels (MCLs) are taken into account with this report. These factors include analytical detection

capability, treatment technology available, benefits, and costs. PHGs and MCLGs are not mandatory and therefore compliance is not legally required by any public water system.

WATER QUALITY DATA CONSIDERED

All water quality data collected by our water system between 2019 and 2021 to determine compliance with drinking water standards from sources that supplied the water system and not treated to remove given constituents are reported. This data is also presented in our annual consumer confidence reports, which are electronically available at: <https://www.calwater.com/waterquality/water-quality-reports/>.

GUIDELINES FOLLOWED

The Association of California Water Agencies (ACWA) formed a workgroup that prepared guidelines for water utilities to use in preparing these required reports and ACWA guidelines are followed in the creation of this report.

BEST AVAILABLE TREATMENT TECHNOLOGY AND COST ESTIMATES

Both the USEPA and SWRCB DDW adopt best available technologies (BATs), which are the best-known methods of reducing contaminant levels below the MCL. Costs can be estimated for such technologies; however, since many PHGs and all MCLGs are set much lower than the MCL, it is not feasible to determine what treatment is needed to further reduce a constituent to an established goal. Many established goals are set below analytical detection limits, which means that the level has been lowered to zero. In some cases, installing treatment to further reduce very low levels of one constituent may have adverse effects on other aspects of water quality. Additionally, since there is little data readily available to estimate the cost of treatment to achieve some of the health goal levels, use of this “BAT” may still not achieve the PHG or MCLG and the costs may be significantly higher to do so. Costs estimates for treatment were taken from Tables 1 – 3 in the *Suggested Guidelines for Preparation of Required Reports on Public Health Goals to satisfy requirements of California Health and Safety Code Section 116470(b)*, prepared by Association of California Water Agencies (ACWA), April 2022.

Constituents Detected That Exceed a PHG or MCLG

The following is a discussion of constituents that were detected in one or more of our drinking water sources at levels above the PHG, or alternatively above the MCLG and where there is an MCL. As previously stated, the numerical value for PHGs and MCLGs are often set below detectable levels.

Therefore, the Detection Limit for Purposes of Reporting (DLR) is used for reporting each constituent. DLR is the lowest quantity of a substance that can be distinguished within a stated confidence limit, generally one percent. Constituents reported in this section were detected above the method DLR and PHG, and in sources that supplied the system during 2019, 2020, and 2021.

COLIFORM BACTERIA

In November 2021, 87 total samples collected from the distribution system and analyzed for the presence/absence of coliform bacteria. Of these samples, 1.1 % was positive for coliform bacteria.

The MCL for coliform bacteria is 5% positive samples of all samples collected per month, and the MCLG is zero. The coliform drinking water standard was established to minimize the possibility of water-containing pathogens, which are organisms that cause waterborne diseases. Because coliform bacteria are only a surrogate indicator of the potential presence of these pathogens, it is not possible to state a specific numerical health risk. While USEPA normally sets an MCLG “at a level where no known or anticipated adverse effects on persons would occur,” they indicate that they cannot do so with coliforms.

Coliform bacteria are indicator organisms that are ubiquitous in nature and generally are not considered harmful. Their presence/absence is tested because of the ease in monitoring and analysis. If a positive sample is found, it indicates a potential problem that needs to be investigated and followed up with sampling. It is not at all unusual for a system to have an occasional positive sample. It is difficult, if not impossible, to ensure that a system will never get a positive sample.

Sodium hypochlorite is added to drinking water sources to ensure that the water served to customers is microbiologically safe. Disinfectant residuals are carefully controlled and monitored to provide the best health protection without causing the water to have undesirable taste and odor or promoting the formation of disinfection byproducts in the system. This careful balance of treatment processes is essential to continuing the supply of safe drinking water to customers.

Other equally important measures have been implemented, including an effective cross-connection control program, maintenance of a disinfection residual throughout the distribution system, an effective

monitoring and surveillance program, and maintenance of positive pressures in the distribution system. The system has already implemented all of the measures described by DDW as “best available technology” for coliform bacteria in Section 64447, Title 22, and California Code of Regulations (CCR).

Chloramines are added to drinking water sources to ensure that the water served to customers is microbiologically safe. The chloramine residuals are carefully controlled and monitored to provide the best health protection without causing the water to have undesirable taste and odor or promoting the formation of disinfection byproducts in the system. This careful balance of treatment processes is essential to continuing the supply of safe drinking water to customers.

Other equally important measures have been implemented, including an effective cross-connection control program, maintenance of a disinfection residual throughout the distribution system, an effective monitoring and surveillance program, and maintenance of positive pressures in the distribution system. The system has already implemented all of the measures described by DDW as “best available technology” for coliform bacteria in Section 64447, Title 22, California Code of Regulations (CCR).

LEAD (Pb)

The PHG for lead is 0.2 ppb. While there is no MCL, there is an action level (AL) of 15 ppb. Compliance with this drinking water standard is based on the 90th percentile value of all samples collected from household taps in the distribution system. Of 36 samples analyzed, 1 exceeded the action level, and the 90th percentile was 6.1 ppb. The Livermore water system is in full compliance with the federal and state Lead and Copper Rule and is therefore deemed to have “optimized corrosion control.”

The numerical health risk data on lead for the PHG is $<1 \times 10^{-6}$ (PHG is not based on this effect) and for the MCL is 2×10^{-6} , which means two excess cancer cases per one million people. The category of health risk for lead is damage to the kidneys or nervous system of humans, and carcinogenicity.

RECOMMENDATIONS FOR FURTHER ACTION

The drinking water quality of the LIV water system meets all State of California, DDW, and USEPA drinking water standards set to protect public health. Cal Water will continue to assure the protection of public health by researching and examining emerging treating technologies on an ongoing basis while taking into account health protection benefits and cost.

REFERENCES:

- No.1 Excerpt from California Health & Safety Code: Section 116470 (b)
- No.2 Table of Regulated Constituents with MCLs, PHGs, or MCLGs
- No.3 Livermore Water System's 2019, 2020, and 2021 Consumer Confidence Report
- No.4 Health Risk Information for Public Health Goal Exceedance Reports prepared by the Office of Environmental Health Hazard Assessment, California Environmental Protection Agency, February 2019.
- No. 5 Suggested Guidelines for Preparation of Required Reports on Public Health Goals to satisfy requirements of California Health and Safety Code Section 116470(b), prepared by Association of California Water Agencies (ACWA), February 2022.