



Golden State
Water Company
A Subsidiary of American States Water Company

Golden State Water Company
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2019 Report on Public Health Goals

Cordova System

Report Prepared by
Golden State Water Company

Introduction

Public Health Goals - Background

Provisions of the California Health and Safety Code, Section 116470(b), specify that larger water utilities (>10,000 service connections) prepare a special report by July 1, 2019 if their water quality measurements have exceeded any Public Health Goals (PHGs). PHGs are non-enforceable goals established by the California EPA's Office of Environmental Health Hazard Assessment (OEHHA). The law also requires that where OEHHA has not adopted a PHG for a constituent, the water suppliers are to use the Maximum Contaminant Level Goals (MCLGs) adopted by USEPA. Only constituents which have a California primary drinking water standard and for which either a PHG or MCLG has been set are to be addressed.

Golden State Water Company is providing information in conformance with this requirement by providing this updated report. If a regulated constituent was detected in the water supply between 2016 and 2018 at a level exceeding an applicable PHG or MCLG, this report provides the information required by the law. Included is the numerical public health risk associated with the Maximum Contaminant Level (MCL) and the PHG or MCLG, the category or type of risk to health that could be associated with each constituent, the best treatment technology available 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?

The USEPA and the State Water Resources Control Board's Division of Drinking Water (DDW) are responsible for establishing regulations and setting drinking water standards and goals. These agencies, along with the California Public Utilities Commission (CPUC) set rules and regulations for water systems to follow.

PHGs are set by OEHHA and are based solely on public health risk considerations. None of the practical risk-management factors that are considered by the USEPA or DDW in setting MCLs are considered in setting the PHGs. These factors include analytical detection capability, treatment technology available, benefits and costs. The PHGs are not enforceable and are not required to be met by any public water system. MCLGs are the federal equivalent to PHGs.

Water Quality Data Considered

All of the water quality data collected by our water system between 2016 and 2018 for purposes of determining compliance with drinking water standards was considered. This data was summarized in our 2016, 2017, and 2018

Consumer Confidence Reports on Water Quality which were made accessible to all Golden State Water customers.

Guidelines Followed

The Association of California Water Agencies (ACWA) formed a workgroup which prepared guidelines for water utilities to use in preparing these reports. The ACWA guidelines were used in the preparation of our report. No guidance was available from state regulatory agencies.

Best Available Treatment Technology and Cost Estimates

Both the USEPA and DDW adopt Best Available Technologies (BATs) which are the best known methods of reducing contaminant levels to 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 always possible or feasible to determine what treatment is needed to further reduce a constituent downward to or near the PHG or MCLG, many of which are set at zero. Estimating the costs to reduce a constituent to zero is difficult, if not impossible because it is not possible to verify by analytical means that the level has been lowered to zero. In some cases, installing treatment to try and further reduce very low levels of one constituent may have adverse effects on other aspects of water quality.

Constituents Detected that Exceed PHGs or MCLGs

Inorganic Chemical Contaminants

Arsenic

Arsenic has been detected at levels up to 3.0 micrograms per liter ($\mu\text{g/L}$) in the water supplied to the Cordova System. The MCL is 10 $\mu\text{g/L}$ and the PHG is 4 nanograms per liter (ng/L). Our water system is in full compliance with the drinking water standard for arsenic, but the arsenic level in the system at times exceeds the PHG.

The DDW and USEPA have determined that arsenic is a health concern at certain levels of exposure. The category of health risk associated with arsenic, and the reason that a drinking water standard was adopted for it, is that some people who drink water containing arsenic above the MCL over many years may experience skin damage and circulatory system problems and are at a higher risk of getting cancer. The numerical health risk for the PHG of 4 ng/L is one excess cancer case per million people. The numerical health risk for the MCL of 10 $\mu\text{g/L}$ is 2.5 excess cancer cases per thousand people.

The DDW lists the Best Available Technologies (BATs) for removing arsenic to below the MCL as activated alumina, ion exchange, lime softening, coagulation/filtration and reverse osmosis (RO). For the purpose of cost estimation, RO was selected as the treatment method to consistently remove arsenic below the PHG in the Cordova system.

Copper

Copper sampling is conducted at indoor faucets of selected customer homes, as directed by the Lead and Copper Rule. The Action Level for copper is 1300 µg/l and the PHG is 300 µg/L. Action Level (AL) means the concentration of copper in water which is used to determine the treatment requirements that a water system is required to complete. Compliance is determined by comparing the AL to the 90th percentile level for all copper samples taken. The 90th percentile copper level in the Cordova System is 320 µg/L. This is below the AL per the Lead and Copper Rule, but it is above the PHG level.

The principal source of copper in tap water is the pipes and plumbing fixtures in the customer's own household plumbing. Factors that can increase the amount of copper in tap water include: household fittings or faucets made of brass; copper plumbing materials; and water that is soft or corrosive.

Based on human data, people who drink water containing copper in excess of the Action Level (1300 µg/L) could develop gastrointestinal irritation over a short-term exposure.

Our water system is in full compliance with the Lead and Copper Rule. Based on our extensive sampling, it was determined according to State regulatory requirements that we meet the Action Level for copper. Therefore, we are deemed by DDW to have optimized corrosion control for our system.

In general, optimizing corrosion control is considered to be the BAT to manage copper. We will continue to monitor our water quality parameters that relate to corrosivity, such as the pH, hardness, alkalinity, and total dissolved solids, and will take action if necessary to maintain our system in an optimized corrosion control condition.

Since we are meeting the optimized corrosion control requirement, it is not prudent to initiate additional corrosion control treatment as it involves the addition of other chemicals that could cause additional water quality issues. Therefore, no estimate of cost is included.

Volatile Organic Chemicals

Tetrachloroethylene

Tetrachloroethylene (PCE) has been detected at levels up to 0.56 µg/L in water supplied to the Cordova System. The MCL for PCE is 5 µg/L and the PHG is 0.06 µg/L. Our water system is in full compliance with the drinking water standard for PCE, but the PCE level in the system at times exceeds the PHG.

The DDW and USEPA have determined that PCE is a health concern at certain levels of exposure. This organic chemical has been a popular solvent, particularly for the dry cleaning industry. It generally gets into drinking water by improper waste disposal. This chemical has been shown to cause cancer in laboratory animals such as rats and mice when animals are exposed at high levels over their lifetimes. Chemicals that cause cancer in laboratory animals also may increase the risk of cancer in humans who are exposed over long periods of time. The numerical health risk for the PHG of 0.06 µg/L is one excess cancer case per million people. The numerical health risk for the MCL of 5.0 µg/L is 8 excess cancer cases per hundred thousand people.

The DDW lists the BATs for removing PCE as treatment with granular activated carbon (GAC) and by packed tower aeration. For the purpose of cost estimation, GAC was selected as the treatment method to consistently remove PCE below the PHG in the Cordova system.

Cost of Treatment

The cost of treatment can depend upon a number of factors. They include the type of treatment, the number of separate treatment facilities required, and if there are multiple contaminants, whether they can all be removed with one treatment technology or require multiple technologies. The table below lists the costs for the Cordova System to consistently remove the contaminants listed in the previous section to below the PHG or MCLG. Costs include construction and annual operational expenses. These costs are estimates only, and could in fact be much higher.

Best Available Technology	Number of Sites Required	Total Annual Cost	Monthly Cost / Connection
Reverse Osmosis	3	\$3,094,459	\$17.50
Granular Activated Carbon	1	\$591,469	\$3.34
TOTAL	4	\$3,685,929	\$20.84

Summary of Findings

Overall, three contaminants were detected in the Cordova System at concentrations above the PHGs and or MCLGs. For all constituents, at no time did Golden State Water ever serve water that contained contaminants in violation of recognized and enforceable MCLs. The drinking water quality of Golden State Water's Cordova System meets all drinking water standards for protection of public health.

If you have any questions about this report, please call us at (800) 999-4033. We are available to answer your questions 24 hours a day, 7 days a week, or visit our website at <http://www.gswater.com>.