



RESPONSE TO RECENT EWG ARTICLES

Misleading Commentary

Recent news articles on the quality of California’s tap water, based on the Environmental Working Group’s (EWG) online tap water database and commentary article published in the journal Environmental Health, are alarmist and misleading.

EWG has taken available 2012-2017 data from the state database and then applied its own assumptions/mathematical techniques to assign a single number for each chemical that is allegedly “representative” of the entire system across this time period. The EWG acknowledges various uncertainties in its methodology that could overstate or understate risks. As such, its findings are admittedly speculative, and its commentary article was not subject to traditional scientific peer review before publication.

EWG presumes that all state and federal standards, such as Maximum Contaminant Levels (MCLs), are inadequate and relies on its other non-enforceable guidelines or goals for the purposes of their analysis. It consistently misstates that these health guidelines represent the maximum concentration of a contaminant in water that scientists consider safe. In many cases, it uses Public Health Goals (PHGs) published by the California Office of Environmental Health Hazard Assessment (OEHHA). OEHHA has repeatedly stated¹ that “As long as drinking water complies with all MCLs, it is considered safe to drink, even if some contaminants exceed PHG levels...a PHG is not a boundary line between a “safe” and “dangerous” level of a contaminant.”

In the commentary article, EWG adapted a new cumulative risk methodology initially described in a Water Research Foundation (WRF) report published in 2014, employing their selected health guidelines to estimate cancer risk. The EWG report is currently under review by WRF and the authors of the 2014 study. The Orange County Water District (OCWD) PFAS Taskforce will review and discuss those findings when they become available. In the meantime, California and federal regulatory agencies have several mechanisms for ensuring that drinking water complies with water quality regulations including, MCLs, PHGs, Notification and Response Levels, and health advisories. Water retailers in Orange County only serve water that meets all state and federal requirements.

Your Water is Safe

Orange County’s drinking water is safe and is continuously tested to ensure compliance

¹ <https://oehha.ca.gov/media/downloads/faqs/oehhaphgguide2015.pdf>

with state and federal standards that have been peer-reviewed. The results of this testing are transmitted monthly to the California State Water Resources Control Board (SWRCB) Division of Drinking Water (DDW).

Water utilities are required to annually provide the results of their water quality and monitoring tests in a Consumer Confidence Report (CCRs) to every resident. The best way for citizens to understand their water supply and quality is to read this report and to contact their local water utility with any questions. Typically, CCRs are posted on the website of the water utility.

(Recommend inserting your agency's specific water quality data that counters EWG's data.)

Measuring Water Quality

Here are some of the metrics used by the state and federal regulators to determine compliance with drinking water quality regulations:

- Maximum Contaminant Levels (MCLs) are health protective standards required to be met by public water systems for individual or groups of contaminants. They are adopted as regulations by either the state DDW or by the federal Environmental Protection Agency (EPA). By law, MCLs consider not only chemicals' health risks but also factors such as their detectability and treatability, as well as costs of treatment. The California Health & Safety Code §116365(a) requires a contaminant's MCL to be established at a level as close to its PHG (see below) as is technologically and economically feasible, placing primary emphasis on the protection of public health.
- Public Health Goals (PHGs) are concentrations of drinking water contaminants that pose no significant health risk if consumed for a lifetime, based on current risk assessment principles, practices, and methods. PHGs are established by the California Office of Environmental Health Hazard Assessment (OEHHA), the state agency responsible for implementing Proposition 65. PHGs are issued without consideration of frequency of occurrence, detectability, treatability, or cost of treatment. PHGs are not enforceable standards, but exceedances of PHGs must be reported on annual Consumer Confidence Reports.
- Notification Levels (NLs) are health-based advisory levels established administratively by the state Division of Drinking Water (DDW) for chemicals in drinking water that currently lack maximum contaminant levels (MCLs). When chemicals are found at concentrations greater than their notification levels, certain notification requirements and recommendations apply. Notification levels can be issued more quickly than enforceable MCLs; in some cases, NL chemicals proceed through the formal regulatory process and superseding MCLs are established (since the 1980s, 40 of 93 NL compounds

have had MCLs established). NL chemicals also have a corresponding Response Level (RL), which is a higher concentration at which DDW recommends the removal or treatment of the drinking water source.

- Health Advisories (HAs) are established by the federal EPA to provide information on contaminants that can cause human health effects and are known or anticipated to occur in drinking water. EPA's health advisories are non-enforceable and non-regulatory and provide technical information to states agencies and other public health officials on health effects, analytical methodologies, and treatment technologies associated with drinking water contamination.

Additional Background

Water utilities within OCWD's service area provide water from two different sources. Approximately 77% of their water comes from the local groundwater basin which is managed by OCWD. The remaining 23% is imported from either the Colorado River or Northern California.

OCWD is internationally recognized as a leader in water quality testing. It tests water from about 1,500 locations throughout the Orange County Groundwater Basin, taking more than 20,000 samples and conducting 400,000 analyses of these samples each year.

OCWD has made significant investments in state-of-the art technology allowing it to detect contaminants at the part per trillion (ppt) level, which is like one drop of water in 26 Olympic-sized swimming pools. Advances in science now allow water utilities to detect extremely minute levels of minerals and compounds in water that have no impact to human health.