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Meeting Date: 08-19-2022
Meeting: Operations Committee/Board of Directors (Operations)

Informational Item

TO: Operations Committee/Board of Directors (Operations)

FROM: Paul Sellier, Director of Water Resources

THROUGH: Crystal Yezman for Ben Horenstein, General Manager

DIVISION NAME: Water Resources

ITEM: 2022 Public Health Goals Triennial Report

SUMMARY

Over the past three years, Marin Municipal Water District's drinking water has continued to meet or exceed all state and federal drinking water health standards. The Public Health Goals Report, published every three years, is a brief, written report in plain language that gives information on the detection of any contaminants above the Public Health Goals (PHGs) published by the state's Office of Environmental Health Hazard Assessment (OEHHA). The report must also list the detection of any contaminant above the Maximum Contaminant Level Goals (MCLGs) set by United States Environmental Protection Agency (U.S. EPA) for all other contaminants until such time as OEHHA has published PHGs for those contaminants. The Public Health Goals Report differs from the Annual Water Quality Report (also referred to as the Consumer Confidence Report), the latter of which summarizes regulatory drinking water standards established by the U.S. Environmental Protection Agency and/or California State Water Resources Control Board (SWRCB). PHGs and MCLGs are not regulatory standards.

From 2019 through 2021, Marin Municipal Water District (MMWD) collected on average 150 Total Coliform/*E.Coli* samples a month, with a total of 5,590 samples collected over the 3 year period. Of these, one sample tested positive for *E.coli*. Follow-up resampling was negative for *E.Coli,* and therefore did not exceed the regulatory Maximum Contaminant Level (MCL). No violation of the MCL for *E.Coli* occurred. However, this single occurrence exceeded the MCL goal (MCLG) of zero for *E.Coli*.

DISCUSSION

The California Health and Safety Code Section 116470(b) requires public water utilities with more than 10,000 service connections to prepare a brief written report every three years if a regulated drinking water contaminant is detected with levels that exceed the Public Health Goal (PHG) or the Maximum Contaminant Level Goal (MCLG). Both PHGs and MCLGs are the level of

a chemical contaminant in drinking water that does not pose a significant risk to health and are non-enforceable. PHGs and MCLGs are not regulatory standards. However, state law requires the State Water Resources Control Board (SWRCB) to set drinking water standards for chemical contaminants as close to the corresponding PHG or MCLG as is economically and technologically feasible. In some cases, it may not be feasible for SWRCB to set the drinking water standard for a contaminant at the same level as the PHG because the technology to treat the chemicals may not be available, or the cost of treatment may be very high. SWRCB must consider these factors when developing drinking water standards. PHGs are established by the California Environmental Protection Agency's Office of Environmental Health Hazard Assessment (OEHHA), and MCLGs are health-based goals adopted by the U.S. EPA. This report is unique to California, and only contaminants with established primary drinking water standards and a PHG or MCLG as of December 31, 2021 are addressed in this report.

Maximum Contaminant Levels (MCLs) are enforceable drinking water standards established by the United States Environmental Protection Agency (USEPA) and/or California State Water Resources Control Board (SWRCB) and are set at very conservative levels to provide protection to consumers against all but very low to negligible risk and are the regulatory definition of what is safe. MCLs are required to be set at levels as close to the corresponding PHGs as technically and economically feasible, with the primary focus on protection of public health. PHGs and MCLGs, unlike MCLs, do not take into account the practical risk-management factors, including analytical detection capability, treatment technology availability, benefits and cost.

MMWD last prepared a Public Health Goal Report in 2019 for the prior three-year period. The 2022 Public Health Goal Report covers contaminants detected in MMWD's water supply during the 3-year period of January 1, 2019 through December 31, 2021 where the detected level of a contaminant exceeded the corresponding PHG or MCLG. *E.Coli* was the only contaminant with a MCL that exceeded its corresponding MCLG, on one occasion. From 2019 through 2021, MMWD collected on average 150 Total Coliform/*E.Coli* samples a month, with a total of 5,590 samples collected over the three-year period. Of these, one sample was positive for *E.coli*. Follow-up resampling was negative for *E.Coli* indicating that it is likely that the sample was inadvertently contaminated during the sample collection process.

The MCL for *E.coli* was not exceeded as the follow-up investigation and sampling did not confirm the initial positive result. Therefore, no violation of the MCL for *E.coli* occurred. OEHHA does not have an established PHG for *E.coli*. The MCLG for *E.coli* is zero (0). Exceeding zero *E.coli* bacterial one time in the three-year period does not indicate the need for changes in the treatment process or other corrective action as there can be an occasional positive due to sampling or analytical error.

Further, MMWD has already implemented Best Available Technology (BAT) as outlined in California Code of Regulations Title 22, Section 64447 to achieve compliance with the *E.coli* MCL. These practices include disinfection and filtration of source water, monitoring of the water quality in the distribution system, maintenance of disinfectant residual throughout the distribution system, and maintenance of the distribution system, such as pipe replacement and repairs, flushing the distribution system, having a cross-connection program and maintaining positive pressure in the distribution system. Since MMWD is currently practicing BATs, there is no cost estimate for implementation of BATs.

ATTACHMENT(S)
None