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December 23, 2019

## YORK WATER DISTRICT'S CLARIFICATION ON EWG'S TAP WATER DATABASE

Then Environmental Working Group's (EWG) drinking water quality reports correctly, that the water provided by YWD is ***in compliance with federal health-based drinking water standards***. It also reports that there are 6 "contaminants detected above health guidelines". This is misleading because none of the contaminants listed actually describe levels as "Guidelines" but rather are listed as "Goals". We believe there is a significant difference between the two as outlined below.

### EPA Primary Drinking Water Standards:

The National Primary Drinking Water Regulations (NPDWR) are legally enforceable primary standards and treatment techniques that apply to public water systems. Primary standards and treatment techniques protect public health by limiting the levels of contaminants in drinking water. No drinking water supply is ever completely free of contaminants nor is it generally practical or needed to remove them all.

**EPA Primary Standards: Maximum Contaminant Level (MCL):** *MCLs Represent the highest level of a contaminant that is allowed in drinking water. MCLs are set as close to the Maximum Contaminant Level Goals (MCLG) as feasible, using the best available treatment technology and taking cost into consideration. These MCLs are enforceable "Standards."*

**EPA Maximum Contaminant Level Goals (MCLG):** *An MCLG is the level of a contaminant in drinking water below which there is no known or expected risk to health. MCLGs allow for a margin of safety and are non-enforceable public health Goals. The EPA has published MCLG for many contaminants that are lower than the MCL or even 0. Unfortunately, it is recognized that it is not considered technologically and/or economically feasible to meet these goals- Yet.*

### **State of California EPA PUBLIC HEALTH GOALS (PHG -Only applicable to California):**

The California Environmental Protection DRAFT (not currently accepted) regulations have proposed Public Health Goals (PHG) for a number of contaminants in drinking water. "The PHG is a level of drinking water contaminant at which adverse health effects are not expected to occur from a lifetime of exposure." These are similar to EPA MCLGs. *The California Safe Drinking Water Act of 1996 requires development of "PHG's based exclusively on public health considerations."* This means, like the EPA MCLG, they do not attempt to account for the reality of limitations in setting or even meeting these Goals only that data studied says at these levels it looks like there is no risk.

Much of the time, the reality is that there are technological and/or economical limitations which do not make achieving these Goals feasible. It might be something like it cannot be accurately measured with today's technology, cannot be removed to that level by today's technology, or to do so would make the cost or availability of drinking water prohibitive (etc.).

REFERENCE TABLE 1: MCLs, MCLGs, & PHGs						
#	EWG LISTED CONTAMINANT	AVERAGE YWD RESULT (PPB)	STANDARD -EPA MCL	GOAL -EPA MCLG	GOAL -CA PHG	COMMENTS
1	<b>Bromodichloromethane</b>	5.56	NONE	0	0.06	Regulated as TTHM Combination
2	<b>Chloroform</b>	27.0	NONE	0.07	0.4	Regulated as TTHM Combination
3	<b>Chromium (Hexavalent)</b>	0.19	NONE	NONE	0.02	EPA Total Chromium Limit of 100
4	<b>Dichloroacetic Acid</b>	13.2	NONE	0.0	0.0	Regulated as HAA Combination
5	<b>Total Trihalomethanes</b>	32.6	80	NONE	0.8	Regulated as TTHM Combination
6	<b>Trichloroacetic Acid</b>	10.2	NONE	0.02	0.02	Regulated as HAA Combination

PPB: In Parts per Billion

Table Discussion:

You will notice from Reference Table 1 provided with the “6 contaminants detected above health guidelines listed to the left” when compared to EPA MCLs (Standards) that, as expected, no EPA Health Standards/EPA MCL’s have been exceeded. There are however various “Goals” (MCLG/PHG) for reducing the level of these contaminants which serve as Goals for the future to further reduce risk. As mentioned previously, these Goals take into account only public health concerns. While it is normal for people to want their drinking water to be completely free of contaminants, removing all contamination is sometimes not technological or financially feasible or necessary to protect our health. The US EPA and Maine Drinking Water Program are responsible for determining the levels of contaminants that can remain in water supplies without threatening human health.

Conclusions:

York Water District is in compliance with federal health-based drinking water standards. Our Goal, as a public water supplier, will always be to provide drinking water that meets or exceeds current health-based standards at the most reasonable cost. For the future, as various technology improves and evolves, we expect to be constantly adjusting our operations to meet changing and likely dropping health-based standards thereby continually reducing the risks for our customers.