1.0 Introduction

Under the Calderon-Sher Safe Drinking Water Act of 1996 public water systems in California serving greater than 10,000 service connections must prepare a report containing information on 1) detection of any contaminant in drinking water at a level exceeding a Public Health Goal (PHG), 2) estimate of costs to remove detected contaminants to below the PHG using Best Available Technology (BAT), and 3) health risks for each contaminant exceeding a PHG. This report must be made available to the public every three years. The initial report was due on July 1, 1998, and subsequent reports are due every three years thereafter.

This report has been prepared to address the requirements set forth in Section 116470 of the California Health and Safety Code. It is based on water quality analyses during calendar years 2016, 2017, and 2018 or, if certain analyses were not performed during those years, the most recent data available. The report has been designed to be as informative as possible, without unnecessary duplication of information contained in the Consumer Confidence Reports, which are mailed to customers by July 1st of each year.

There are no regulations explaining requirements for the preparation of PHGs reports. A workgroup of the Association of California Water Agencies (ACWA) Water Quality Committee has prepared suggested guidelines for water utilities to use in preparing PHGs reports. The ACWA guidelines were used in the preparation of this 2019 report. These guidelines include tables of cost estimates for BAT. The State of California (State) provides ACWA with numerical health risks and category of health risk information for contaminants with PHGs. This health risk information is appended to the ACWA guidelines.
2.0 California Drinking Water Regulatory Process

California Health and Safety Code Section 116365 requires the State to develop a PHG for every contaminant with a primary drinking water standard or for any contaminant the State is proposing to regulate with a primary drinking water standard. A PHG is the level of a contaminant in drinking water that poses no significant health risk if consumed for a lifetime. The process of establishing a PHG is a risk assessment based strictly on human health considerations. PHGs are recommended targets and are not required to be met by any public water system.

The State office designated to develop PHGs is the California Environmental Protection Agency’s Office of Environmental Health Hazard Assessment (OEHHHA). The PHG is then forwarded to the State Water Resources Control Board, Division of Drinking Water (DDW) for use in revising or developing a Maximum Contaminant Level (MCL) in drinking water. The MCL is the highest level of a contaminant that is allowed in drinking water. California MCLs cannot be less stringent than federal MCLs and must be as close as is technically and economically feasible to the PHGs. DDW is required to take treatment technologies and cost of compliance into account when setting an MCL. Each MCL is reviewed at least once every five years.

Total chromium and two radiological contaminants (gross alpha particle and gross beta particle) have MCLs but do not yet have designated PHGs. For these contaminants, the Maximum Contaminant Level Goal (MCLG), the federal U.S. Environmental Protection Agency (USEPA) equivalent of PHGs, is used in the 2019 PHGs Report.

N-nitrosodimethylamine (NDMA) has a PHG of 3 nanograms per liter, but is not regulated in drinking water with a primary drinking water standard. Bromodichloromethane, bromoform, and dichloroacetic acid are three disinfection byproducts that have federal MCLGs of 0 but are not individually regulated with primary drinking water standards. According to the ACWA guidance and instructions from
3.0 Identification of Contaminants

Section 116470(b)(1) of the Health and Safety Code requires public water systems serving more than 10,000 service connections to identify each contaminant detected in drinking water that exceeded the applicable PHG. Section 116470(f) requires the MCLG to be used for comparison if there is no applicable PHG.

The City of Santa Ana (City) water system has approximately 44,838 service connections. The following constituents were detected at one or more locations within the drinking water system at levels that exceeded the applicable PHGs or MCLGs:

- Arsenic – naturally-occurring in local groundwater
- Bromate – formed when naturally-occurring bromide reacts with ozone during the disinfection process.
- Coliform Bacteria, Total – naturally-occurring in the environment but can also be an indicator of the presence of other pathogenic organisms originating from sewage, livestock or other wildlife.
- Perchlorate – industrial contamination in groundwater
- Gross alpha particle activity (gross alpha) – naturally-occurring in local groundwater and surface water purchased from MWDSC
- Gross beta particle activity (gross beta) – naturally-occurring in surface water purchased from MWDSC
- Uranium – naturally-occurring in local groundwater and in surface water purchased from MWDSC.

The accompanying chart shows the applicable PHG or MCLG and MCL for each contaminant identified above. The chart includes the maximum, minimum, and average
concentrations of each contaminant in drinking water supplied by the City in calendar years 2016 through 2018.

4.0 Numerical Public Health Risks

Section 116470(b)(2) of the Health and Safety Code requires disclosure of the numerical public health risk, determined by OEHHA, associated with the MCLs, Action Levels, PHGs and MCLGs. Available numerical health risks developed by OEHHA for the contaminants identified above are shown on the accompany chart. Only numerical risks associated with cancer-causing chemicals have been quantified by OEHHA.

**Arsenic** – OEHHA has determined the health risk associated with the PHG is 1 excess case of cancer in a million people. USEPA has determined the risk associated with the MCL is 2.5 excess cases of cancer in 1,000 people exposed over a 70-year lifetime.

**Bromate** – OEHHA has determined the theoretical health risk associated with the PHG is 1 excess case of cancer in a million people. USEPA has determined the risk associated with the MCL is 1 excess cases of cancer in 10,000 people exposed over a 70-year lifetime.

**Coliform Bacteria, Total** – OEHHA has not established a PHG. USEPA has established an MCLG of 0.

**Gross Alpha** – OEHHA has not established a PHG. USEPA has established an MCLG of 0 and the risk associated with the MCL is 1 excess case of cancer in 1,000 people over a lifetime exposure.

**Gross Beta** – OEHHA has not established a PHG. USEPA has established an MCLG of 0 and the risk associated with the MCL is 2 excess cases of cancer in 1,000 people over a lifetime exposure.
**Perchlorate** – OEHHA has not established a numerical health risk for perchlorate because PHGs for non-carcinogenic chemicals in drinking water are set at a concentration at which no known or anticipated adverse health risks will occur, with an adequate margin of safety.

**Uranium** – OEHHA has determined the theoretical health risk associated with the PHG is 1 excess case of cancer in a million people. USEPA has determined the risk associated with the MCL is 5 excess cases of cancer in 100,000 people exposed over a 70-year lifetime.

### 5.0 Identification of Risk Categories

Section 116470(b)(3) of the Health and Safety Code requires identification of the category of risk to public health associated with exposure to the contaminant in drinking water, including a brief, plainly worded description of those terms. The risk categories and definitions for the contaminants identified above are shown on the accompanying chart.

### 6.0 Description of Best Available Technology

Section 116470(b)(4) of the Health and Safety Code requires a description of the best available technology, if any is available on a commercial basis, to remove or reduce the concentrations of the contaminants identified above. The BATs are shown on the accompanying chart.

### 7.0 Costs of Using Best Available Technologies and Intended Actions

Section 116470(b)(5) of the Health and Safety Code requires an estimate of the aggregate cost and cost per customer of utilizing the BATs identified to reduce the concentration of a contaminant to a level at or below the PHG or MCLG. In addition, Section 116470(b)(6) requires a brief description of any actions the water purveyor
intends to take to reduce the concentration of the contaminant and the basis for that decision.

**Arsenic** – The BATs for removal of arsenic in water for large water systems are: activated alumina, coagulation/filtration, electrodialysis, ion exchange, lime softening, oxidation/filtration, and reverse osmosis. Arsenic was detected above the PHG in the local groundwater (Wells 37 and 38). The City is in compliance with the MCL for arsenic. The estimated cost to reduce arsenic levels in local groundwater to below the PHG of 0.004 microgram per liter (µg/l) using ion exchange was calculated. Because the DDW detection limit for purposes of reporting (DLR) for arsenic is 2 µg/l, treating arsenic to below the PHG level means treating arsenic to below the DLR of 2 µg/l. There are numerous factors that may influence the actual cost of reducing arsenic levels to the PHG. Achieving the water quality goal for arsenic could be approximately $1,500,000 per year, or $32 per household per year.

**Bromate** – The BATs for removal of bromate in water for large water systems are: coagulation/filtration optimization, granular activated carbon, and reverse osmosis. Bromate was detected above the PHG in surface water supplied by MWDSC. The City is in compliance with the MCL for bromate. The estimated cost to reduce bromate levels in MWDSC surface water to below the PHG of 0.1 µg/l using reverse osmosis was calculated. Because the DDW detection limit for purposes of reporting (DLR) for bromate is 1 µg/l, treating bromate to below the PHG level means treating bromate to below the DLR of 1 µg/l. There are numerous factors that may influence the actual cost of reducing bromate levels to the PHG. Achieving the water quality goal for bromate could range from approximately $2,610,000 to $22,230,000 per year, or between $58 and $496 per household per year.

**Coliform Bacteria, Total** – The BAT for removal of coliform bacteria in drinking water has been determined by USEPA to be disinfection. The City already disinfects all water served to the public. Chlorine or chloramines is used to disinfect the water because it is
an effective disinfectant and residual concentrations can be maintained to guard against biological contamination in the water distribution system.

Coliform bacteria are indicator organisms that are ubiquitous in nature. They are a useful tool because of the ease in monitoring and analysis. The City collects weekly samples for total coliforms at various locations in the distribution system and monthly at each well. If coliform bacteria are detected in the drinking water sample, it indicates a potential problem that needs to be investigated and followed up with additional sampling. It is not unusual for a system to have an occasional positive sample. Although USEPA set the MCLG for total coliforms at 0 percent positive, there is no commercially available technology that will guarantee 0 percent positive every single month; therefore, the cost of achieving the PHG cannot be estimated.

The City will continue several programs that are in place to prevent contamination of the water supply with microorganisms. These include:

- Disinfection using chlorine or chloramines and maintenance of a chlorine residual at every point in the distribution system
- Monitoring throughout the distribution system to verify the absence of total coliform and the presence of a protective chlorine residual
- Flushing program in which water pipelines known to have little use are flushed to remove stagnant water and bring in fresh water with residual disinfectant
- Cross-connection control program that prevents the accidental entry of non-disinfected water into the drinking water system.

**Gross Alpha, Gross Beta, and Uranium** – The only BAT for the removal of gross alpha in water for large water systems is reverse osmosis, which can also remove gross beta, and uranium, if detected. Gross alpha was detected above the MCLG in the local groundwater and in the surface water supplied by MWDSC. Gross beta was detected above the MCLG in the surface water supplied by MWDSC. Uranium was detected above the PHG in the local groundwater (Wells 16, 18, 20, 21, 24, 27, 28, 29, 30, 33,
and in the surface water supplied by MWDSC. The cost of providing treatment using reverse osmosis to reduce gross alpha levels in local groundwater and in MWDSC surface water to the MCLG of 0 picoCurie per liter (pCi/l) (and consequently gross beta in MWDSC surface water below the MCLG; and uranium in local groundwater and in MWDSC surface water below the PHG) was calculated. Because the DLR for gross alpha is 3 pCi/l, treating gross alpha to 0 pCi/l means treating it to below the DLR of 3 pCi/l. Achieving the water quality goal for gross alpha could range from $8,690,000 to $74,100,000 per year, or between $194 and $1,651 per household per year.

**Perchlorate** – The BATs for removal of perchlorate in water are: ion exchange and biological fluidized bed reactor. Perchlorate was detected above the PHG in the local groundwater (Well 24). The City is in compliance with the MCL for perchlorate. The estimated cost to reduce perchlorate levels in local groundwater to below the PHG of 1 µg/l using ion exchange was calculated. Because the DLR for perchlorate is 4 µg/l, treating perchlorate to below the PHG level means treating perchlorate to below the DLR of 4 µg/l. There are numerous factors that may influence the actual cost of reducing perchlorate levels to the PHG. Achieving the water quality goal for perchlorate could range from $105,000 to $226,000 per year, or between $2.33 and $5.04 per household per year.

**All Contaminants** – In addition, a cost estimate to treat all water produced or purchased by the City using ion exchange and reverse osmosis to remove all the contaminants detected above the PHGs or MCLGs was calculated. All the contaminants listed in the accompanying chart may be removed to non-detectable levels by ion exchange and reverse osmosis, except total coliform bacteria. As shown on the accompanying chart, achieving the water quality goals for all contaminants, except total coliform bacteria, using ion exchange and reverse osmosis could range from $8,800,000 to $74,300,000 per year, or between $196 and $1,657 per household per year.
For additional information, please contact Mr. Robert Hernandez, Water Services Quality Supervisor, at (714) 647-3341, or write to the City of Santa Ana, 220 South Daisy Avenue, Santa Ana, California 92703.
## 2019 Public Health Goals Report
### City of Santa Ana

<table>
<thead>
<tr>
<th>Parameter</th>
<th>Units of Measurement</th>
<th>PHG or (MCLG)*</th>
<th>MCL</th>
<th>DLR</th>
<th>Concentration</th>
<th>Category of Risk</th>
<th>Cancer Risk at PHG or MCLG</th>
<th>Cancer Risk at MCL</th>
<th>Best Available Technologies</th>
<th>Aggregate Cost Per Year</th>
<th>Cost Per Household Per Year</th>
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</thead>
<tbody>
<tr>
<td>Microbiological</td>
<td></td>
<td></td>
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<tr>
<td>Total Coliform Bacteria (a)</td>
<td>% samples positive</td>
<td>(0)</td>
<td>5</td>
<td>NA</td>
<td>1.2</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
<td>D</td>
<td>(b)</td>
<td>(b)</td>
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<td>Inorganic Chemicals</td>
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</tr>
<tr>
<td>Arsenic</td>
<td>μg/l</td>
<td>0.004</td>
<td>10</td>
<td>2</td>
<td>&lt;2</td>
<td>ND</td>
<td>2.5</td>
<td>ND</td>
<td>C</td>
<td>$1,500,000 (c)</td>
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<td>Bromate</td>
<td>μg/l</td>
<td>0.1</td>
<td>10</td>
<td>1</td>
<td>NA</td>
<td>NA</td>
<td>2</td>
<td>ND</td>
<td>C</td>
<td>$2,610,000 - $22,230,000 (d)</td>
<td>$56 - $496 (d)</td>
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<tr>
<td>Perchlorate</td>
<td>μg/l</td>
<td>1</td>
<td>5</td>
<td>4</td>
<td>&lt;4</td>
<td>ND</td>
<td>5.1</td>
<td>ND</td>
<td>E</td>
<td>$110,000 - $230,000 (e)</td>
<td>$2.33 - $5.04 (e)</td>
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<td>Radiological</td>
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<tr>
<td>Gross Alpha Particle Activity</td>
<td>pCi/l</td>
<td>0.43</td>
<td>20</td>
<td>1</td>
<td>3</td>
<td>&lt;3</td>
<td>ND - 14</td>
<td>ND</td>
<td>C</td>
<td>$8,690,000 - $74,100,000 (f)</td>
<td>$194 - $1,651 (f)</td>
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<tr>
<td>Gross Beta Particle Activity</td>
<td>pCi/l</td>
<td>0.43</td>
<td>20</td>
<td>1</td>
<td>3</td>
<td>NR</td>
<td>5.0</td>
<td>4 - 6</td>
<td>C</td>
<td>$8,800,000 - $74,300,000 (g)</td>
<td>$196 - $1,657 (g)</td>
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<tr>
<td>Uranium</td>
<td>pCi/l</td>
<td>0.43</td>
<td>20</td>
<td>1</td>
<td>3</td>
<td>NR</td>
<td>5.0</td>
<td>4 - 6</td>
<td>C</td>
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<td>$196 - $1,657 (g)</td>
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<td>All Contaminants</td>
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</tbody>
</table>

* MCLGs are shown in parentheses. MCLGs are provided only when no applicable PHG exists.

### Risk Categories
- **C** (Carcinogen) = A substance that is capable of producing cancer.
- **E** (Endocrine Toxicity; Developmental Toxicity) = Affects thyroid; causes neurodevelopmental deficits

### Notes
- PHG = Public Health Goal
- MCL = Maximum Contaminant Level
- MCLG = Maximum Contaminant Level Goal
- NA = Not Applicable or Available
- ND = Not Detected
- NR = Not Required
- μg/l = micrograms per liter or parts per billion
- pCi/l = picocuries per liter
- DLR = Detection Limit for Purposes of Reporting
- < = Value is less than the DLR

(a) The chart shows highest monthly percentage of positive samples as the detected value. Samples were collected in the distribution system.
(b) Cost could not be estimated.
(c) Estimated cost to remove arsenic using IE.
(d) Estimated cost to remove bromate using RO.
(e) Estimated cost to remove perchlorate using IE.
(f) Estimated cost to remove gross alpha particle activity using RO, which also removes gross beta particle activity and uranium.
(g) Assuming treating the entire production by IE and RO, which can remove all contaminants listed in the above chart to below the detection levels, except for total coliform, which can be detected anywhere in the distribution system.

### Treatment/Control Technologies
- **AA** = Activated Aluminum
- **BF** = Biological Fluidized Bed Reactor
- **C/F** = Coagulation/Filtration
- **D** = Disinfection
- **E** = Electrolysis
- **IE** = Ion Exchange
- **LS** = Lime Softening
- **O/F** = Oxidation/Filtration
- **RO** = Reverse Osmosis