

## City of Napa Utilities Water Division Response to the Environmental Working Group's (EWG) Release of 2019 National Tap Water Database

The City of Napa Utilities Water Division has reviewed the alarmist report presented by the Environmental Working Group (EWG). We are disappointed that the EWG has elected to display the information in this manner.

It is disconcerting when an organization puts out a report that causes alarm to our own customers about the quality of Napa's drinking water. This report from EWG is misleading and we want our customers to know that the City of Napa's drinking water is safe, of the highest quality, and meets or surpasses all state and federal drinking water standards. If your drinking water ever fails to meet those requirements, we must and will inform you.

Information related specifically to the EWG Report

- The EWG health guidelines are relevant to the California Office of Environmental Health Hazard Assessment (OEHHA) that sets public health goals (PHGs). These health GOALS are theoretical levels and are often set at zero, or below laboratory analytical method limits. It is fine to have GOALS of zero, however ENFORCEABLE REGULATIONS can only be established with data that are attainable and repeatable. The difference is significant and EWG does not fairly acknowledge the science. The City of Napa publicized its [Triennial Water Quality Report relative to PHGs](#) at the City Council public meeting on July 16, 2019.
- Seven of the eight constituents referenced by the EWG as a concern are **Disinfection Byproducts (DBPs)** that occurred only in isolated areas of our water system. Disinfection byproducts are formed when organic materials present in the water react with chlorine as water ages. Chlorine is necessary to avoid cholera, dysentery, and acute life-threatening diseases.

Major factors that led to the DBP occurrences from 2014-2016:

- Upon the August 22, 2014 South Napa Earthquake and for 6 months thereafter, our pipe network experienced numerous water main breaks and water service continued, but was routed in circuitous directions so pipes could be isolated to make repairs.
- The annual hydrant flushing program was deferred in winter 2013/2014 due to drought messaging and in 2014/2015 due to the ongoing earthquake response.

Swift actions were taken to address the situation and manage the quality of the drinking water provided to City of Napa customers to keep them safe:

- notification letters were sent directly to customers in the specific DBP-affected areas,
- a [Public Meeting with Environmental Protection Agency \(EPA\) drinking water toxicology specialist](#) was held to answer questions about the studies, explain the occurrence in the water system, and how it would be addressed,
- hydrant flushing program was expedited,
- mixing and aeration systems were installed in storage tanks.

Since these isolated occurrences, our drinking water continues to meet all drinking water regulations. Ongoing actions to manage water quality and reduce DBP occurrence include:

- optimize the water treatment process to reduce natural organic materials,
  - ensure storage tank turnover and minimize water age,
  - implement annual unidirectional hydrant flushing program that cleans our pipe network,
  - design and install bypass pipe prior to installation of mixing and aeration system in Barwick Jamieson Treatment Plant finished water tank,
  - install valves and reduce pipe size to reduce water age in Upvalley location that affects 7 customers,
  - continue to work with stakeholders in our watersheds to protect our source water quality into the future.
- EWG does not recognize that the analytical methods for DBPs are only valid down to 0.5 parts per billion (ppb). Below this level laboratory instruments cannot confirm presence or absence with certainty. For example, EWG's health guidelines for Dibromochloromethane is 0.1 ppb.
  - The City of Napa Utilities Water Division does not disagree with EWG's information about water filters. Although it is not required to make City of Napa's water safe, IF one decides to use an in-home [water filter](#), understand that **all filters must be maintained**.

The City of Napa maintains a network of more than 360 miles of pressurized pipes delivering water to homes and businesses 24/7. We continuously monitor water quality from the source to the tap to assure the effectiveness of the treatment process. We release our [Annual Drinking Water Quality Report](#), a

consumer report required of all municipal water agencies by the California State Water Resources Control Board, Division of Drinking Water (CA-DDW). The results reported annually are based on rigorous testing of more than 220 regulated and unregulated contaminants, both man-made and natural, from more than 12,000 water samples taken throughout City of Napa's water system. The City of Napa complies with the standards adopted by the U.S. EPA and the CA-DDW.

Water providers in California are subject to very strict water quality standards. City of Napa customers should be absolutely confident in the quality of the tap water. Through investments in major infrastructure, emergency management and preparedness, and state of the art water treatment processes, the City ensures clean, safe, reliable water for its customers. For more information visit: [City of Napa Water Quality](#)