Drinking Water Quality Policy Principles

Prepared for the City of Riverside Public Utilities

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Approved by Board of Public Utilities 1/24/2022 | Adopted by City Council 2/22/2022

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Abbreviations, Acronyms, and Initialisms

City	City of Riverside
DDW	State of California Division of Drinking Water
DLR	Detection Limit for Purposes of Reporting
DWQPP	Drinking Water Quality Policy Principles
MCL	Maximum Contaminant Level
PHG	Public Health Goal
PRP	Potentially Responsible Party
Regional Water Board	Regional Water Quality Control Board
RP	Responsible Party
RPU	Riverside Public Utilities
State Board	California State Water Resources Control Board
USEPA	US Environmental Protection Agency

1.Introduction

Delivering high quality water to its customers, in a manner that is sustainable and environmentally sound, is part of the fundamental mission of the Riverside Public Utilities (RPU). This document discusses RPU's Drinking Water Quality Policy Principles (DWQPP); adherence to these policy principles, which provide clear and concise guidance for RPU staff, will help RPU achieve its mission statement. The DWQPP must be implemented throughout the organization and all staff are responsible for understanding and implementing the policy principles. RPU staff will have the requisite support from RPU management, RPU board members, and city council members.

Our Mission

The City of Riverside Public Utilities Department is committed to the highest quality water and electric services at the lowest possible rates to benefit the community.

Our Vision

Our customers will recognize Riverside Public Utilities as a unique community asset with a global reputation for innovation, sustainability and enhanced quality of life.

1.1 RPU Operations

RPU provides potable water, non-potable water, and recycled water to the City of Riverside. As of 2020, RPU serves water to a population of about 310,500 people through approximately 65,000 service connections within an area of 75 square miles. In addition, RPU also acts as a wholesaler, selling surplus water to neighboring agencies. Since 2008, all the City's potable water demand has been supplied solely from local groundwater in the Bunker Hill and Riverside basins. The City also may use the Rialto-Colton and the Arlington Basin as a source of potable water supply in the future if the cost for alternative new supplies make treatment of water from these sources cost-effective. These sources are considered most vulnerable to historical contamination from industrial and agricultural operations.

The condition of the groundwater basins is dynamic and influenced by activities and changes outside of RPU's control, including groundwater contamination, natural variations in weather patterns, actions by other agencies, and evolving State and Federal regulations. These basins are shared with other water purveyors and their associated water infrastructure, including well fields, groundwater recharge facilities, and wastewater treatment plants. The operation of these facilities combined with regional hydrologic variance adds to the complexity of managing these resources. This underscores the importance of remaining engaged at both the local and regional levels and for RPU staff to track changes in groundwater basins to ensure an adequate and sustainable water supply is available for current and future generations.

1.2 Water Quality

Currently RPU utilizes groundwater sources located in the Bunker Hill Basin and the Riverside Basin(s) to meet its potable water demand. RPU directly treats some of its wells and blends all water sources at a central location before entering the distribution system.

In recent years, RPU usually collects more than 27,000 water samples to test for a variety of potential contaminants. Samples were collected at water sources, along transmission pipelines throughout the distribution system, including reservoirs and booster stations, and treatment plants to ensure that only the water of the highest water quality is served to its customers. RPU uses state-certified independent laboratories to perform water tests. In addition, the US Environmental Protection Agency (USEPA) and the State Water Resources Control Board (State Board) provide regulatory oversight and prescribe regulations in order to ensure that tap water is safe to drink.

There are a number of groundwater contamination plumes that impact or may impact RPU's potable production wells and RPU has been actively engaged – and will remain engaged – with the potentially responsible parties (PRPs) / responsible parties (RP)[1] and regulatory agencies to

[1] The term "PRP" will be utilized throughout the remainder of this document to refer to both PRPs and RPs. A PRP means any person or party who *may* have caused or contributed to and therefore *may* be liable for the cost of environmental restoration, while an RP is a person or party that has been identified as a person or party as being liable for those costs.

ensure that the water that is served to RPU's customers is of the highest quality and meets all state and federal water quality standards.

2. RPU's Drinking Water Quality Policy Principles

Drinking water is a right and a resource and must be protected. RPU's three bedrock principles for drinking water quality are as follow:

1. Every person has the inalienable right to safe, clean, affordable, and accessible water adequate for human consumption, cooking, and sanitary purposes[2].
2. Drinking water is one of our most valuable resources and it must be safeguarded against contaminants that would lower the water quality.
3. All PRPs that have caused or contributed to contamination of the City's drinking water supply source, i.e., groundwater basins, will be compelled to treat drinking water to less than detectable concentrations[3]. prior to PRPs introducing treated water into the City's transmission/distribution system.

All the DWQPPs listed below are based on these bedrock principles. Specific Drinking Water Quality Policy Principles are listed below:

DWQPP 1. **Meet Drinking Water Standards.** The quality of the water that is served by the City to its potable customers will meet or exceed all applicable federal and state drinking water standards. RPU understands that clean drinking water is effectively and ultimately protective of public health.

DWQPP 2. **Public Health Goals and PRP Identification.** RPU will strive to ensure that potable water produced at the well source after PRP identification will meet the non-detect (ND) limits concentrations for regulated constituents. For unregulated constituents, RPU will strive to serve potable water with concentrations below the notification level, when economically and technologically feasible, and approved by RPU's Board.

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[2] State of California. Assembly Bill 685.106.3. (a)

[3] The DLR is a parameter that is set by regulation for each reportable analyte. A DLR is not laboratory specific and is independent of the analytical method used.
https://www.waterboards.ca.gov/drinking_water/certlic/drinkingwater/documents/drinkingwaterlabs/detectionlimitsdefinition.pdf

DWQPP 3. **Agreements.** It is anticipated that RPU and the PRP(s) will develop agreements that fully define the scope of work that would be required to deliver clean, reliable water with non-detectable concentrations of the constituent of concern. While the details and components of the agreement may evolve over the term of the agreement based on changed conditions, the intent and objective of the agreement – water quality compliance– will be relevant and applicable until the expiration of the agreement. See DWQPP 4.

DWQPP 4. **Federal and State Policies.** RPU will work cooperatively with regulatory agencies and participate in industry to advocate and guide federal and state policies on water quality that are reasonable and supported by sound science. RPU is committed to fully cooperating with enforcement agencies (primarily the Regional Water Board, USEPA, and DDW).

DWQPP 5. **Change in Regulations**: RPU anticipates that during the period covered by the Agreement with the PRP(s), the name of the governmental entity enforcing the regulations, the numerical limits (i.e. MCL[4], DLR, PHG[5], etc. . . .), and the terminology used to describe the limit, may change. However, this Agreement is intended to secure the best water quality possible for RPU customers and that will comply with whatever regulations are applicable and enforceable during the term of this Agreement.

DWQPP 6. **Exceedance of MCL.** RPU cannot serve water that does not meet the drinking water quality standards (see DWQPP 1), nor can RPU accept the delivery of treated water from the PRP's treatment system that is not in compliance. Doing so would entail shifting cost burdens from the RPs to the City. City employees do not have the authority to cause an action that financially encumbers the City of Riverside in any way. The PRP would be encouraged to meet with the City of Riverside's legal counsel.

DWQPP 7. **Blending.** Similar to DWQPP 5, RPU staff cannot allocate any portion of the blending reservoir's operational volume to blend down the RPs treated water. RPU's rate payers have invested in the reliability and flexibility of its water system including its available blending capacity. To that end, RPU will actively seek to recover any unauthorized use of its system blending capacity. RPU will

[4]MCLs are adopted as enforceable regulatory limits. MCLs are drinking water standards to be met by public water systems and are health protective.
https://www.waterboards.ca.gov/drinking_water/certlic/drinkingwater/MCLsandPHGs.html

[5]A PHG is the concentration of a contaminant in drinking water that does not pose a significant risk to human health. While PHGs are not regulatory standards the State Water Board must set drinking water standards for these contaminants as close to the corresponding PHG as is economically and technologically feasible. https://oehha.ca.gov/water/public-health-goals-phgs

actively pursue all means to recover costs associated with any harm to its water supply caused by any known entities.

DWQPP 8. **Termination of Obligation.** The PRP's obligation to operate and treat RPU's water supply should not terminate at an arbitrary time in the future. RPU is under no obligation to accept any water that contains PRP's contamination unless done explicitly by an agreement. In addition, the PRP is responsible for not only the mitigation of the existing contamination, but also contaminants identified in the future.

DWQPP 9. **Replacement Water**. To the extent possible, the PRP will pump, treat, and deliver water to RPU's transmission/distribution system pursuant to the agreement. Any groundwater extraction must be in accordance with the Western-San Bernardino Judgment and operational consideration (pressure and treatment requirements). The PRP may purchase or pay for replacement water for the City if unable to provide treatment at the source.

3. Summary

The fundamental mission of RPU is to deliver high quality water to its customers by applying a multi-barrier approach to protect public health by managing water quality of drinking water from its source to customers. This document defines RPU's DWQPP and directs staff to adhere to the guidelines contained herein. All people within RPU's service area are entitled to safe, clean, and affordable drinking water, and RPU is committed to protecting and enhancing its water supply source for the benefit of the people.