

Charleston Water System Position Statement: Unregulated Compounds in Drinking Water

Adopted by the Board of Commissioners; July, 24, 2018

Charleston Water System (CWS) is committed to meeting or exceeding all drinking water regulations put forth by the South Carolina Department of Health and Environmental Control (SCDHEC), which coordinates their program with oversight from the United States Environmental Protection Agency (EPA.) As a regulated water utility, CWS employs licensed water treatment professionals and solely relies on SCDHEC and the EPA to evaluate health risks and establish drinking water guidelines and regulations.

Supporting public health is a key component of CWS's mission. Consequently, in an effort to inform, empower, and protect our customers, and to provide them with high quality drinking water, CWS voluntarily exceeds established regulatory requirements by testing for compounds known or anticipated to occur in public water supplies and those with non-regulatory EPA Health Advisory limits.

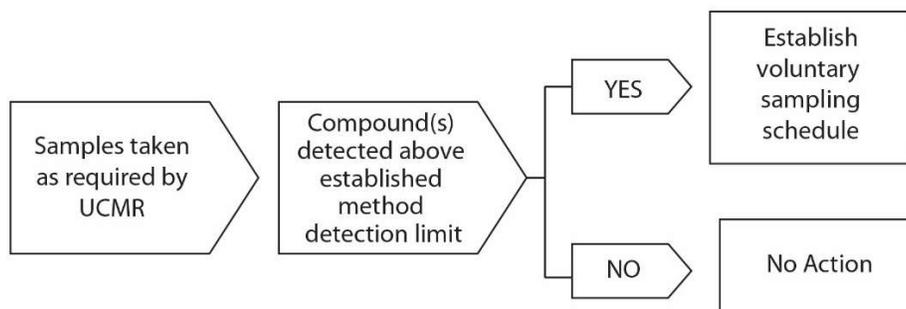
CWS takes the following position on unregulated compounds, categorizing them into three groups, each with a distinct plan of action:

I. Compounds under the EPA's Unregulated Contaminants Monitoring Rule (UCMR)

By desire and law, CWS participates in each iteration of the EPA's UCMR. This rule dictates that CWS collects data for up to 30 specific compounds which are not regulated by the National Primary Drinking Water Regulations, but are known or anticipated to occur in public water systems, and therefore may warrant future regulation under the Safe Drinking Water Act (SDWA). The UCMR provides EPA, state regulators, and water utilities with scientifically-valid data on the occurrence of these compounds in drinking water in the United States, which then permits assessment of the potential population being exposed and the predicted levels of exposure. This data is one of the primary sources of information the EPA uses to prioritize and develop future regulatory decisions for unregulated compounds. All CWS results from the UCMR monitoring are reported on the CWS website and detectable concentrations are reported in the CWS annual Consumer Confidence Report (CCR)/Water Quality Report.

Voluntary testing:

If a compound is detected in CWS treated drinking water during any UCMR testing event, CWS will voluntarily establish a testing schedule for that compound that is more frequent than required by the UCMR.



Treatment:

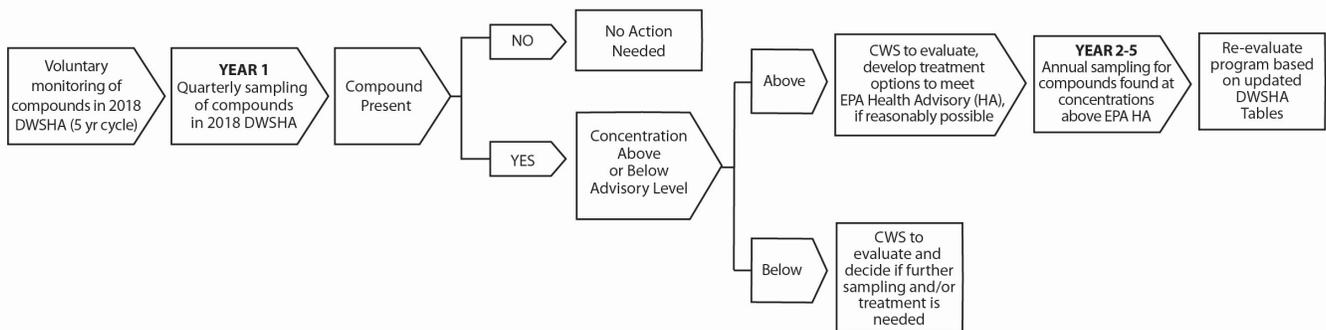
If the EPA develops regulatory limits for any compound found during the UCMR program, CWS will adhere to any new regulations. If additional treatment is required, CWS will upgrade the treatment process to ensure compliance, within established regulatory limits.

II. Unregulated Compounds with EPA Health Advisories

The EPA Office of Water publishes Health Advisories (HAs) as informed guidance for unregulated compounds. They are not legally-enforceable federal standards. However, CWS voluntarily monitors its treated drinking water for all compounds identified in the EPA's 2018 Edition of the Drinking Water Standards and Health Advisories Tables ([DWSHA](#)), and this process occurs in five-year cycles.

Voluntary testing:

The first year includes quarterly monitoring of treated drinking water exiting the CWS Hanahan Water Treatment Plant. Sampling will occur mid-month of each quarter (August, November, February, May) to examine seasonal variations. Subsequent years will consist of annual monitoring of any compounds detected in the inaugural sampling. To further examine seasonal variation, annual sampling will rotate through each quarter, as described above.



Treatment:

If a compound is present in concentrations below the EPA Health Advisory level, CWS may or may not employ additional sampling or treatment actions. However, if a compound with an EPA Health Advisory is present in CWS treated water in concentrations higher than its EPA Health Advisory level, CWS will evaluate current treatment options and develop a plan of action to meet the Health Advisory, if reasonably possible.

After the five-year cycle concludes, this voluntary monitoring program will be re-evaluated utilizing the most recent version of the DWSHA.

III. All Other Unregulated Compounds

CWS does not routinely test for these compounds and does not plan to alter its water treatment process if any are present because the EPA and SCDHEC have not deemed any of these compounds a threat to human health at quantities that may exist in drinking water.

Ultimately, it's impossible to test for all known compounds because they number in the billions, and new compounds are being developed every day.

Test Results

CWS test results for unregulated compounds, if detected, are posted to www.charlestonwater.com. They're also included in the CWS annual Consumer Confidence Report/Water Quality Report available online and in print, and provided annually to SCDHEC as required.

Evaluating The Results

Almost every compound, including pure water, has a hazard profile. Health risk is an indication of the probability that harm could occur under defined conditions of concentration and exposure.

When evaluating the compounds found in any drinking water supply, it's important to consider that science and technology continue to advance, enabling detection of more compounds at continually lower levels in drinking water.

The question becomes, which compounds, and at what concentrations, and in what quantities consumed, over what time period, can potentially cause harm from exposure via drinking water.

Compliance

As with all CWS policies, the CWS Commissioners and executive Officers are responsible for ensuring the compliance of this position statement. And as such may opt to modify such position as it deems in its best interest and in the interest of its valued customers, as necessary.