



EDMUND G. BROWN JR.  
GOVERNOR



MATTHEW RODRIGUEZ  
SECRETARY FOR  
ENVIRONMENTAL PROTECTION

## State Water Resources Control Board

Division of Drinking Water

October 23, 2014

Mrs. Katharine J. P. Loudd  
Manager  
Palo Alto Park Mutual Water Company  
2190 Addison Avenue  
East Palo Alto, CA 94303

Dear Mrs. Loudd:

**CITATION NO. 02-17-14C-015**  
**MANGANESE SECONDARY MAXIMUM CONTAMINANT LEVEL VIOLATION**  
**PALO ALTO PARK MUTUAL WATER COMPANY, WATER SYSTEM NO. 4110020**

Enclosed is a citation issued to Palo Alto Park Mutual Water Company (hereafter, Water System or PAMWVC). The citation is issued as the Water System failed to comply with Subsection 64449 (a), Chapter 15, Title 22, California Code of Regulations (CCR) and Permit Provision No. 3 of the Permit Amendment to Domestic Water Supply Permit No. 02-88-006 issued to the Water System on June 29, 2007. The water supplied by PAMWVC to the public exceeded the Manganese Secondary Maximum Contaminant Level (SMCL) during September 2014.

The attached citation consists of seven sections: Applicable Authorities, Statement of Facts, Determination, Directives, Parties Bound, Severability and Further Enforcement Action. The Applicable Authorities, Statement of Facts and Determination sections describe the events leading up to the issuance of the citation. The Directives section specifies what the Water System needs to do to return to compliance. The Parties Bound, Severability and Further Enforcement Action sections describe administrative penalties to be assessed for failure to comply with the citation. No administrative penalty is levied with the current citation.

If you have any questions regarding this letter, please contact Jose P. Lozano IV, P.E. at (510) 620-3459 or me at (510) 620-3453.

Sincerely,

A handwritten signature in black ink, appearing to read "Eric Lacy".

Eric Lacy, P.E.  
District Engineer  
Santa Clara District  
Division of Drinking Water  
State Water Resources Control Board

FELICIA MARCUS, CHAIR | THOMAS HOWARD, EXECUTIVE DIRECTOR

850 Marina Bay Parkway, Bldg. P, 2nd Floor, Richmond, CA 94804-6403 | [www.waterboards.ca.gov](http://www.waterboards.ca.gov)

Enclosures: 1) January 28, 2009 letter to the PAPMWC  
2) Attachment A - Sample Manganese SMCL Exceedance Notice  
3) Attachment B - Proof of Notification

Certified Mail #7006 3450 0001 8420 8501

cc: San Mateo County Environmental Health Department (e-mailed to Greg Smith; w/ encl.)

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cc: San Mateo County Environmental Health Department (e-mailed to Greg Smith; w/ encl.)

bcc: File Server; 4110020\Enforcement\September 2014 Mn SMCL vio citation; Enforcement  
File; Chron (all w/ encl.)  
W4110020/141022.cit.ltr

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STATE OF CALIFORNIA  
DIVISION OF DRINKING WATER  
STATE WATER RESOURCES CONTROL BOARD

**TO:** Palo Alto Park Mutual Water Company  
Water System No. 4110020  
2190 Addison Avenue  
East Palo Alto, CA 94303

**ATTN:** Mrs. Katherine J. P. Loudd  
Manager

**CITATION FOR VIOLATION OF CALIFORNIA CODE OF REGULATIONS, TITLE 22,  
SECTION 64449 (a) et al. – WATER SYSTEM NO. 4110020  
CITATION NO. 02-17-14C-015  
Issued on October 23, 2014**

Section 116650 of the California Health and Safety Code authorizes the issuance of a citation to a public water system for violation of the California Safe Drinking Water Act (Health and Safety Code, Division 104, Part 12, Chapter 4, commencing with Section 116270) (hereinafter "California SDWA"), or any regulation, standard, permit or order issued or adopted thereunder.

The State Water Resources Control Board, acting by and through its Division of Drinking Water (hereinafter "Division" or "DDW") and the Deputy Director for the Division (hereinafter "Deputy Director"), hereby issues a citation to the Palo Alto Park Mutual Water Company

1 (hereinafter, "PAPMWC" or "Water System") (mailing address: 2190 Addison Avenue, East  
2 Palo Alto, CA 94303) for violation of California Code of Regulations (CCR), Title 22, Section  
3 64449 (a) and Permit Provision No. 3 of the Permit Amendment to Domestic Water Supply  
4 Permit No. 02-88-006 issued to the Water System on June 29, 2007.

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7 **APPLICABLE AUTHORITIES**

8 **Section 116650 of California Health and Safety Code provides:**

9  
10 (a) If the department determines that a public water system is in violation of  
11 this chapter or any regulation, permit, standard, citation, or order issued or adopted  
12 thereunder, the department may issue a citation to the public water system. The citation shall  
13 be served upon the public water system personally or by certified mail. Service shall be  
14 deemed effective as of the date of personal service or the date of receipt of the certified mail.  
15 If a person to whom a citation is directed refuses to accept delivery of the certified mail, the  
16 date of service shall be deemed to be the date of mailing.

17 (b) Each citation shall be in writing and shall describe the nature of the  
18 violation or violations, including a reference to the statutory provision, standard, order,  
19 citation, permit, or regulation alleged to have been violated.

20 (c) A citation may specify a date for elimination or correction of the condition  
21 constituting the violation.

22 (d) A citation may include the assessment of a penalty as specified in  
23 subdivision (e).

24 (e) The department may assess a penalty in an amount not to exceed one  
25 thousand dollars (\$1,000) per day for each day that a violation occurred, and for each day  
26 that a violation continues to occur. A separate penalty may be assessed for each violation.  
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**California Code of Regulations, Title 22, Section 64449 (a) provides, in relevant part:**

A community water system shall not exceed a Manganese level of 0.05 milligrams per liter (mg/L) in the drinking water supplied to the public.

**Permit Provision No. 3 of the Permit Amendment to Domestic Water Supply Permit No. 02-88-006 issued to the Water System on June 29, 2007 specifies, in relevant part:**

PAPMWC shall at all times provide proper blending to the water produced by the Wells 02 and 07 so that the water supplied into the distribution system is in compliance with the Iron and Manganese Maximum Contaminant Levels (MCLs).

**STATEMENT OF FACTS**

The PAPMWC is a community water system that serves domestic water to 692 service connections with a population of approximately 2500 people (2012 Annual Report to the Drinking Water Program). The Water System is a mutual water company owned by homeowners, residing in the Palo Alto Park area, a subdivision in East Palo Alto and Menlo Park. The Water System consists of five groundwater wells - Well 02 (Primary Station Code (PSC) No. 4110020-002), Well 03 (PSC No. 4110020-003), Well 05 (PSC No. 4110020-004), Well 06 (PSC No. 4110020-005) and Well 07 (PSC No. 4110020-006); two storage tanks - a 350,000-gallon welded steel storage tank and a 11,500-gallon steel storage tank; two booster pumps and a distribution system.

Well 07 has Iron and Manganese levels exceeding the secondary maximum contaminant levels (SMCL) of 0.3 milligrams per liter (mg/L) and 0.05 mg/L, respectively. Well 02 has

1 Manganese levels exceeding the secondary MCL. To mitigate the aforementioned water  
2 quality problems, the PPMWC chlorinates with sodium hypochlorite (NaOCl) prior to the  
3 350,000-gallon tank to oxidize the iron and manganese produced by Wells 02 and 07 and  
4 blends the water produced by these two wells with the other wells in accordance with an  
5 blending plan specified in the Permit Amendment to Domestic Water Supply Permit No. 02-  
6 88-006 issued to the Water System on June 29, 2007.

7

8 In accordance with the Division's January 28, 2009 letter to the Water System (copy  
9 enclosed), the PPMWC is currently required, among others, to sample for iron and  
10 manganese and have analyzed by a certified laboratory Well 02, Well 07 and Well Blend  
11 Iron/Manganese (aka Storage Tank Effluent) on a monthly basis.

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14 In September 2014, the drinking water supplied by PPMWC, as collected on September 16,  
15 2014 from its Water Storage Tank Effluent (aka Well Blend Iron/Manganese or Tank Effluent;  
16 PSC No. 4110020-007) monitoring location, had a Manganese level of 0.07 mg/L, which  
17 exceeds the Manganese SMCL of 0.05 mg/L.

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20 The Water System failed to notify the Division about the manganese SMCL exceedance in a  
21 timely manner. It was instead the Division who brought the violation to the PPMWC'S  
22 attention in an October 16, 2014 telephone discussion with Ms. Katherine Loudd, the Water  
23 System manager.

24

#### DETERMINATION

25

26 The Division has determined that the PPMWC failed to comply with the Manganese  
27 Secondary Maximum Contaminant Level and Permit Provision No. 3 of the Permit  
Amendment to Domestic Water Supply Permit No. 02-88-006 issued to the Water System on

28



1 June 29, 2007 during September 2014. In September 2014, the drinking water supplied by  
2 the PAPMWC, as collected on September 16, 2014 from its Water Storage Tank Effluent  
3 (aka Well Blend Iron/Manganese or Tank Effluent; PSC No. 4110020-007) monitoring  
4 location, had a Manganese level of 0.07 mg/L.

5  
6 **DIRECTIVES**

7 The PAPMWC is hereby directed to take the following actions:

- 8  
9 1) Forthwith, the PAPMWC shall cease and desist from failing to comply with Section 64449  
10 (a), Chapter 15, Title 22, CCR and Permit Provision No. 3 of the Permit Amendment to  
11 Domestic Water Supply Permit No. 02-88-006 issued to the Water System on June 29,  
12 2007 immediately.
- 13 2) Conduct public notification for the Manganese SMCL violation in conformance with  
14 Section 64463.4(c), Chapter 15, Title 22, CCR within thirty (30) days upon receipt of this  
15 citation. The notification shall be completed in accordance with the following methods:
- 16 a. Mail or direct delivery to each customer receiving a bill including those that  
17 provide their drinking water to others (e.g., schools or school systems, apartment  
18 building owners or large private employers), and other service connections to  
19 which water is delivered by the water system, and  
20  
21 b. Use of one or more of the following methods to reach persons not likely to be  
22 reached by a mailing or direct delivery (renters, etc.):
- 23 1. Publication in a local newspaper;
  - 24 2. Posting in conspicuous public places served by the water system, or on  
25 the Internet; or
  - 26 3. Delivery to community organizations.
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A sample copy of public notification for your use in notifying the public and your employees is enclosed for your reference and use (Attachment A). Division approval of the proposed notice is required prior to performing notification. Complete Attachment B (Proof of Notification form) and return it to the Division by November 24, 2014. A copy of the notice used shall be attached to the Proof of Notification form. The Proof of Notification must identify the methods of public notification and provide adequate evidence of the notification (e.g., mailing receipts issued by the post office).

3) Investigate the Manganese SMCL exceedance event and prepare a written Corrective Action Plan (CAP) based on the investigation findings. The CAP shall include an evaluation of the causes of the SMCL exceedance event and the specific measures to be taken to ensure that future SMCL violations and the non-reporting of such violations will not occur.

As part of the CAP, the Water System, beginning December 1, 2014 and every week on a Monday thereafter shall sample and have analyzed by a certified laboratory the compliance sampling location Well Blend Iron/Manganese (aka Storage Tank Effluent) for iron and manganese. The Water System shall continue to sample and have analyzed by a certified laboratory Well 02 and Well 07 during the third week of the each month. Wells 03, 05 and 06 must sampled for iron and manganese and the results analyzed by a certified laboratory once every three years. All laboratory results shall be submitted electronically to the Division's Monitoring and Evaluation Unit (MEU) by the laboratory. In addition, all analytical results, together with the chain of custody papers, must be submitted to the Division as soon as these become available.

The Water System, as part of the CAP, shall also evaluate its blending and oxidation treatment process to determine if the operation of the wells is providing the proper blend;

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if the chlorination treatment employed is adequately oxidizing the excess iron and manganese from the raw water supply and providing an effective residual disinfectant into the distribution system, with a free chlorine level entering the distribution system to be maintained, as a minimum, at or above 0.3 mg/L (but not exceeding the maximum residual disinfectant level for chlorine of 4.0 mg/L); and if the level of the accumulated sediments in the 350,000-gallon storage has reached a stage that would eventually allow passage of the oxidized iron and manganese into the distribution system. The PPMWC shall provide the evaluation findings and recommendations in the CAP.

Submit the CAP to the Division no later than November 24, 2014.

- 4) Submit to the Division for its review and approval a revised operations plan, incorporating the findings and recommendations of the above-mentioned treatment process evaluation, the compliance monitoring and reporting requirements specified in this citation, as well the field analysis sampling and reporting that the Water System needs to conduct for process control purposes. Submit the operations plan no later than December 24, 2014.

The Division reserves the right to make such modifications to this Citation as it may deem necessary to protect public health and safety. Such modifications may be issued as amendments to this Citation, and shall be deemed effective upon issuance.

Nothing in this Citation relieves the PPMWC of its obligation to meet the requirements of the California Safe Drinking Water Act, or of any regulation, permit, standard, or order issued or adopted thereunder.



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All submittals required by this Citation shall be submitted to the Division at the following address:

Mr. Eric Lacy, P.E., District Engineer  
Santa Clara District  
Division of Drinking Water  
State Water Resources Control Board  
850 Marina Bay Parkway, Building P, Second Floor  
Richmond, CA 94804

**PARTIES BOUND**

This Citation shall apply to and be binding upon the PPMWC, its officers, directors, shareholders, agents, employees, contractors, successors, and assignees.

**SEVERABILITY**

The Directives of this Citation are severable, and the PPMWC shall comply with each and every provision thereof, notwithstanding the effectiveness of any other provision.

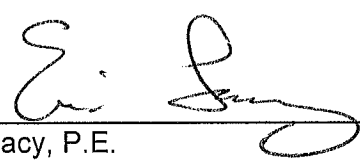
**FURTHER ENFORCEMENT ACTION**

The California SDWA authorizes the Division to: issue citation with assessment of administrative penalties to a public water system for violation or continued violation of the requirements of the California SDWA or any permit, regulation, permit or order issued or adopted thereunder including, but not limited to, failure to correct a violation identified in a citation or compliance order. The California SDWA also authorizes the Division to take

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action to suspend or revoke a permit that has been issued to a public water system if the system has violated applicable law or regulations or has failed to comply with an order of the Division; and to petition the superior court to take various enforcement measures against a public water system that has failed to comply with violates an order of the Division. The Division does not waive any further enforcement action by issuance of this citation.

October 23, 2014  
Date

  
Eric Lacy, P.E.  
District Engineer  
Santa Clara District  
Division of Drinking Water  
State Water Resources Control Board

Attachments

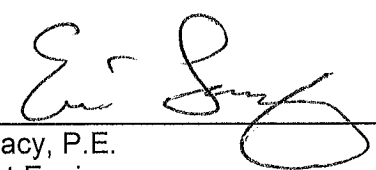
CERTIFIED MAIL # 7006 3450 0001 8420 8501

cc: San Mateo County Environmental Health Department (e-mailed to Greg Smith, w/ attachments.)

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October 23, 2014  
Date

  
Eric Lacy, P.E.  
District Engineer  
Santa Clara District  
Division of Drinking Water  
State Water Resources Control Board

Attachments

CERTIFIED MAIL # 7006 3450 0001 8420 8501

cc: San Mateo County Environmental Health Department (e-mailed to Greg Smith, w/ attachments.)

bcc: File Server: 4110020\Enforcement\September 2014 Mn SMCL vio citation; Enforcement File, Chron (all w/ attachments) W4110020/141020.Cit



State of California—Health and Human Services Agency  
**California Department of Public Health**



MARK B HORTON, MD, MSPH  
Director

ARNOLD SCHWARZENEGGER  
Governor

January 28, 2008<sup>9</sup>

Ms. Katherine J. P. Loudd, Manager  
Palo Alto Park Mutual Water Company  
2190 Addison Avenue  
East Palo Alto, CA 94303

Dear Ms. Loudd:

**FIELD ANALYSIS MONITORING AND REPORTING PROCEDURES  
PALO ALTO PARK MUTUAL WATER COMPANY, WATER SYSTEM NO. 4110020**

This is to confirm the items discussed in the Department's January 22, 2009 telephone conference with Palo Alto Park Mutual Water Company (PAPMWC). Mr. Jose P. Lozano of the Department discussed with you and Mr. Bryan Lincoln, PAPMWC's water system operator, monitoring and reporting procedures that PAPMWC must immediately implement for the field analysis data obtained from the compliance sites listed below.

- Well Blend Iron/Manganese (Primary Station Code (PSC) No. 4110020-007, aka Water Storage Tank Effluent or Distribution System);
- Well 02 (PSC No. 4110020-002); and
- Well 07 (PSC No. 4110020-006).

The Department understands that sampling at the Well Blend Iron/Manganese compliance point occurs just before entering PAPMWC's distribution system, downstream of the 350,000-gallon water tank and the booster pump station.

Mr. Lozano, in a January 22, 2009 e-mail (copy enclosed) to both of you, provided you with instructions and a spreadsheet specifying the field analysis data that PAPMWC is requested to submit weekly to the Department no later than Friday of each week. Mr. Lozano later discussed these instructions and the spreadsheet with both of you during the January 22, 2009 telephone conference. PAPMWC indicated in the phone conference that it will comply with the instructions.

The above-mentioned instructions are part of the reporting and monitoring procedural changes that the Department is requiring you to implement immediately. These procedures specified in this letter supersede Provision 13 of the June 29, 2007 amended permit issued to the water system.

It was previously discussed with you and your staff in the Department's December 17, 2008 site visit that PPMWC exceeded the secondary maximum contaminant level (MCL) for iron and manganese in October 2008, when it supplied water to the distribution system exceeding the secondary MCLs for these two parameters. Section 64449 (a), Title 22, California Code of Regulations (CCR) specifies that the secondary MCLs must never be exceeded in community water systems, like PPMWC. Please note that PPMWC also violated Provision 3 of its June 27, 2007 amended permit in October 2008 when water was supplied into the distribution system exceeded the secondary MCLs for iron and manganese.

In accordance with its June 29, 2007 amended permit, PPMWC is required to sample these three locations monthly and have the results analyzed by a certified laboratory to provide evidence of the effectiveness of the blending and oxidation treatment process. PPMWC is also required in the aforementioned permit to prove on a monthly basis that the field analysis sampling, using its HACH DR /890 Portable Colorimeter, is sufficiently accurate to "mimic" the results of the samples analyzed by the laboratory and can be adequately used as a process control tool. As discussed in several e-mails to you and in the December 17, 2008 site inspection, review of past monthly field analysis sampling results provided by the water system indicates the field kit is not sufficiently accurate to be used as a reliable indicator of treatment performance.

Moreover, the above-mentioned results of laboratory analysis sampling conducted in the previous five months does not conclusively show that blending and oxidation treatment process is working as intended. Therefore, as discussed during the phone conference, the Department is requiring PPMWC to implement the following operational procedures immediately:

- 1) Perform the activities listed below weekly using the field analysis kit and report via e-mail the collected field instrument results using the enclosed spreadsheet to the Department no later than Friday of each week.
  - a. Sample Well 02, Well 07 and Well Blend Iron/Manganese (aka Storage Tank Effluent or Distribution System) for iron and manganese.
  - b. Sample Well Blend Iron/Manganese (aka Storage Tank Effluent or Distribution System) for free chlorine residual.
  - c. Collect and record in the spreadsheet the flow rates of all operating wells at the time of the field analysis sampling, as derived from corresponding flow meter readings of each well
- 2) Sample for iron and manganese and have analyzed by a certified laboratory Well 02, Well 07 and Well Blend Iron/Manganese (aka Storage Tank Effluent or Distribution System) during the third week of each month. For comparison purposes, the field analysis sampling and the laboratory analysis sampling shall be conducted at approximately the same time during the third week of the month.

Wells 03, 05 and 06 must be sampled for iron and manganese and the results analyzed by a certified laboratory once every three years.

Ms. Katherine Loudd  
January 28, 2008  
Page 3

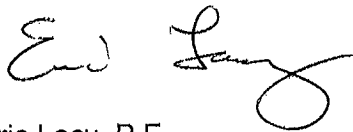
- 3) Verify weekly prior to use by means of the appropriate standards (for iron, manganese and free chlorine residual) that the measurements using PPMWC's HACH DR/890 Portable Colorimeter are accurate. Record comments regarding the field instrument verification performed during the sampling in the space provided in the enclosed spreadsheet.

PAPMWC shall comply with the above weekly sampling and reporting procedures unless otherwise directed by the Department. Failure to comply with the above procedures will result in the Department's taking enforcement action against the water system.

Finally, PPMWC must provide public notification of the October 2008 iron and manganese secondary MCL exceedance in its 2008 Consumer Confidence Report (CCR), which must be provided to its users no later than July 1, 2009. Please provide the Department by February 27, 2009 the sample notice PPMWC proposes to use in notifying its customers of the exceedance.

If you have any questions regarding this letter please call Jose Lozano at (510) 620-3459.

Sincerely,



Eric Lacy, P.E.  
District Engineer  
Santa Clara District  
Drinking Water Field Operations Branch

Enclosure: Excel spreadsheet in the Department's January 22, 2009 e-mail.

cc: San Mateo Environmental Health Department (w/o encl.)



PALO ALTO PARK MUTUAL WATER COMPANY SYSTEM # 4110020  
 WEEKLY FIELD ANALYSIS RESULTS (TO BE E-MAILED TO DRINKING WATER PROGRAM BY FRIDAY OF EACH WEEK)

Date:	Field Fe	Field Mn	Field Free Chlorine Residual	Time	GPM
Well #2			N/A		
Well #3			N/A		
Well #5			N/A		
Well #6			N/A		
Well #7			N/A		
Storage Tank Effluent					

NOTES/COMMENTS REGARDING WEEKLY VERIFICATION OF HACH DR/890 INSTRUMENT:

**IMPORTANT INFORMATION ABOUT YOUR DRINKING WATER**

Este informe contiene información muy importante sobre su agua potable.  
Tradúzcalo o hable con alguien que lo entienda bien.

**Palo Alto Park Mutual Water Company Has Levels of Manganese Above the Secondary Drinking Water Standard in September 2014**

Our water system recently violated the Secondary Maximum Contaminant Level (MCL) for manganese in September 2014. Although this is not an emergency, as our customers, you have a right to know what you should do, what happened, and what we are doing to correct this situation.

We routinely monitor for the presence of drinking water contaminants. Water sample results received on September 16, 2014 showed a manganese level of 0.07 mg/L. This is above the manganese secondary standard or maximum contaminant level (MCL) of 0.05 mg/L.

**What should I do?**

- **You do not need to use an alternative water supply (e.g., bottled water).**
- This is not an immediate risk. If it had been, you would have been notified immediately.
- If you have other health issues concerning the consumption of this water, you may wish to consult your doctor.

**What happened? What is being done?**

[Describe corrective action]. We anticipate resolving the problem within [estimated time frame].

For more information, please contact [name of contact] at [phone number] or [mailing address].

*Please share this information with all the other people who drink this water, especially those who may not have received this notice directly (for example, people in apartments, nursing homes, schools, and businesses). You can do this by posting this public notice in a public place or distributing copies by hand or mail.*

**Secondary Notification Requirements**

Upon receipt of notification from a person operating a public water system, the following notification must be given within 10 days [Health and Safety Code Section 116450(g)]:

- **SCHOOLS:** Must notify school employees, students, and parents (if the students are minors).
- **RESIDENTIAL RENTAL PROPERTY OWNERS OR MANAGERS** (including nursing homes and care facilities): Must notify tenants.
- **BUSINESS PROPERTY OWNERS, MANAGERS, OR OPERATORS:** Must notify employees of businesses located on the property.

This notice is being sent to you by Palo Alto Park Mutual Water Company

State Water System ID#: 4110020 \_\_\_\_\_. Date distributed: \_\_\_\_\_.

**PROOF OF NOTIFICATION**

**Citation Number 02-17-14C-015**

Palo Alto Park Mutual Water Company  
System Number: 4110020

As required by Section 116450 of the California Health and Safety Code, I notified the users of the water supplied by the Palo Alto Park Mutual Water Company of the violations of Title 22, California Code of Regulations (CCR) for the compliance period of September 2014. I complied with the directives of this citation as indicated below:

Required Action

Date Completed

Conduct Public Notification – (Attach copy of the notice and evidence(s) of notification (e.g. mail receipts, etc.))

Submit Corrective Action Plan

Submit Revised Operations Plan


\_\_\_\_\_  
Signature of Water System Representative

\_\_\_\_\_  
Date

**THIS FORM MUST BE COMPLETED AND RETURNED TO THE DEPARTMENT. A COPY OF THE POSTED NOTICE MUST BE ATTACHED TO THIS FORM.**

**Disclosure:** Be advised that Section 116725 and 116730 of the California Health and Safety Code states that any person who knowingly makes any false statement on any report or document submitted for the purpose of compliance with the attached citation may be liable for a civil penalty not to exceed five thousand dollars (\$5,000) for each separate violation for each day that violation continues. In addition, the violators may be prosecuted in criminal court and upon conviction, be punished by a fine of not more than \$25,000 for each day of violation, or be imprisoned in county jail not to exceed one year, or by both the fine and imprisonment.