

State Water Resources Control Board

Division of Drinking Water

May 23, 2018

Niambi Karen Lincoln, General Manager
2190 Addison Ave
East Palo Alto, CA 94303

NOTICE OF VIOLATION

1,2,3-TRICHLOROPROPANE (1,2,3-TCP) MONITORING VIOLATION, 1ST QUARTER 2018 PALO ALTO PARK MUTUAL WATER COMPANY, WATER SYSTEM 4110020

The State Water Resources Control Board's Division of Drinking Water recently completed a review of water quality records for Palo Alto Park Mutual Water Company's (hereinafter "Palo Alto Park Mwc") active sources that require monitoring for 1,2,3-TCP. Effective December 14, 2017, all community and nontransient noncommunity public water systems were required to monitor their active sources for 1,2,3-TCP and report all sampling results to the State Water Board beginning with the first quarter of 2018 (January 1 to March 31, 2018). Initial monitoring for 1,2,3-TCP consists of four quarterly samples beginning with the first calendar quarter of 2018 for the purpose of determining compliance with the 1,2,3-TCP maximum contaminant level (hereinafter "MCL").

The Division of Drinking Water's electronic water quality database shows that there are no 1,2,3-TCP results, for the source(s) listed below, in the first quarter of 2018.

1. Well 05 (PS-Code: 4110020-004)
2. Well 06 (PS-Code: 4110020-005)
3. Well 07 (PS-Code: 4110020-006)

Please review your source(s) monitoring records. If sampling for 1,2,3-TCP was conducted during the first quarter of 2018, have your analytical laboratory submit results of the sample(s) to the State Water Board electronically using the State Water Board approved format.

If the required sampling for 1,2,3-TCP was not conducted, you are required to conduct the following:

- Provide mandatory public notification as specified below; and
- Collect sample(s) by **June 30, 2018** from each source listed above. The results must be submitted electronically by the responsible laboratory using Electronic Data Transfer and the PS-Code assigned to the specific source.
- Collect a minimum of four (4) quarterly samples from each source listed in the table to remain in compliance with the initial monitoring requirements for 1,2,3-TCP.

By not conducting the required source water monitoring, Palo Alto Park Mwc has failed to comply with the requirement to begin initial monitoring pursuant to CCR, Title 22, Section 64445.

Public Notification Requirement

This is considered a monitoring violation and requires public notification. Public notification must be conducted by **May 23, 2019** if the required chemical monitoring was not conducted for Palo Alto Park Mwc sources during the first quarter of 2018. Public notification to Palo Alto Park Mwc's customers may be provided as follows:

- By Mail Or Direct Delivery Of The Public Notice To Each Customer Served By The Water System And;
- By One Of The Following Secondary Methods To Reach Persons Not Likely Be Reached By Mail Or Direct Deliver;
 - By Publication In A Local Newspaper; Or
 - Delivery To Community Organizations; Or
 - Posting In Public Places Served By The Water System, Or On The Internet.

Proof of notification to your water system's customers is required. By **June 10, 2019**, complete Appendix 2 and submit the completed form together with a copy of the public notice that was distributed to your customers. This form should be sent via email to our district's email address at DWPDist17@waterboards.ca.gov.

In addition, Palo Alto Park Mwc shall include this violation in its 2018 Consumer Confidence Report.

Public Notification Requirement

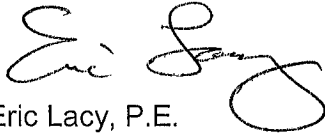
This is considered a monitoring violation and requires public notification. This may be accomplished by including the monitoring violation in your 2018 Consumer Confidence Report to meet the requirement of notification within a one-year period.

In addition, Palo Alto Park Mwc shall include the following language in the Consumer Confidence Report: "We are required to monitor your drinking water for specific contaminants on a regular basis. Results of regular monitoring are an indicator of whether or not your drinking water meets health standards. During the calendar year 2018, we did not monitor for 1,2,3-trichloropropane from [Source Name(s)] during the first calendar quarter and therefore, cannot be sure of the quality of your drinking water during that time."

Palo Alto Park Mwc must determine which option will be used to conduct the secondary distribution of the notice as noted in the Consumer Confidence Report and notify the State Water Board of their decision.

If you have any questions regarding this matter, please contact Van Tsang of my staff at (510) 620-3602.

Sincerely,

A handwritten signature in black ink, appearing to read "Eric Lacy". The signature is fluid and cursive, with a large loop at the end.

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

Enclosures

cc: San Mateo County Environmental Health Department

APPENDIX 1. NOTIFICATION TEMPLATE

IMPORTANT INFORMATION ABOUT YOUR DRINKING WATER

Este informe contiene información muy importante sobre su agua potable.
Por favor hable con alguien que lo pueda traducir.

1,2,3-Trichloropropane Monitoring Requirements Not Met for Palo Alto Park Mutual Water Company During First Quarter 2018

Our water system recently failed to monitor as required for a drinking water standard during the first calendar quarter of 2018 (January – March) and, therefore was in violation of the regulations. Although this is not an emergency, as our customers, you have a right to know what happened, what you should do, and what we did to correct the situation.

We are required to monitor your drinking water for specific contaminants on a regular basis. Results of regular monitoring are an indicator of whether or not our drinking water meets health standards. During the first calendar quarter of 2018, we did not collect a 1,2,3-trichloropropane (1,2,3-TCP) sample from our sources of drinking water and therefore cannot be sure of the quality of our drinking water during that time.

What should I do?

- There is nothing you need to do at this time.
- The table below lists the contaminant we did not properly test for during the calendar year 2018, how many samples we are required to take and how often, how many samples we took, when samples should have been taken, and the date on which follow-up samples were **OR** will be taken.

| Contaminant | Required sampling frequency | Number of samples taken | When all samples should have been taken | When samples were OR will be taken |
|-------------|---|-------------------------|---|------------------------------------|
| 1,2,3-TCP | 4 quarterly samples, 1 st sample was due between Jan. 1 to March 31, 2018 from [Source Name] OR each active raw water source OR list each source | None | During [Compliance Period] | |

- If you have health issues concerning the consumption of this water, you may wish to consult your doctor.

What happened? What is being done?

What happened? What is being done? _____

[Describe corrective action] _____

We anticipate resolving the problem within [estimated time frame] _____.

For more information, please contact:

Water System Contact Name _____

Phone Number _____

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 in compliance with the California Domestic Water Quality and Monitoring Regulations as a means of keeping the public informed.

State Water System ID: 4110020.

Date distributed: _____

APPENDIX 2: COMPLIANCE CERTIFICATION

Notice of Violation Number: [NOV Number]

Name of Water System: Palo Alto Park Mutual Water Company

System Number: 4110020

Certification

I certify that the users of the water supplied by this water system were notified of the 1,2,3-TCP monitoring violation of California Code of Regulations, Title 22, Section 64445 for the compliance period of [Compliance Period Year] and the required actions listed below were completed.

| Required Action | Date Completed |
|---|----------------|
| <i>Public Notification</i> <i>Method(s) Used:</i> _____ | |
| <i>1,2,3-TCP Sample Collection Date(s):</i> _____ | |
| <i>Secondary notification</i> <i>Method(s) used:</i> _____ | |

Signature of Water System Representative

Date

Attach a copy of the public notice distributed to the water system's customers.

**THIS FORM MUST BE COMPLETED AND RETURNED TO THE STATE WATER BOARD,
DIVISION OF DRINKING WATER, NO LATER THAN June 10, 2019**

Disclosure: Be advised that the California Health and Safety Code, Sections 116725 and 116730 state that any person who knowingly makes any false statement on any report or document submitted for the purpose of compliance with the Safe Drinking Water Act may be liable for, respectively, a civil penalty not to exceed five thousand dollars (\$5,000) for each separate violation or, for continuing violations, for each day that violation continues, or be punished by a fine of not more than \$25,000 for each day of violation, or by imprisonment in the county jail not to exceed one year, or by both the fine and imprisonment.