

State Water Resources Control Board
Division of Drinking Water

June 18, 2018

System No. 4110020

Board President
Palo Alto Park Mutual Water Company
2190 Addison Avenue
East Palo Alto, CA 94303

CITATION NO. 02_17_18C_030
ALUMINUM MONITORING & REPORTING VIOLATION
FOR 1ST QUARTER 2018

Enclosed is Citation No. 02_17_18C_030 (hereinafter "Citation"), issued to the Palo Alto Park Mutual Water Company (hereinafter "System"), public water system. Please note that there are legally enforceable deadlines associated with this Citation.

The System will be billed at the State Water Resources Control Board's (hereinafter "State Water Board"), hourly rate for the time spent on issuing this Citation. California Health and Safety Code (hereinafter "CHSC"), Section 116577, provides that a public water system must reimburse the State Water Board for actual costs incurred by the State Water Board for specified enforcement actions, including but not limited to, preparing, issuing and monitoring compliance with a citation. At this time, the State Water Board has spent approximately two hours on enforcement activities associated with this violation.

The System will receive a bill sent from the State Water Board in August of the next fiscal year. This bill will contain fees for any enforcement time spent on the System for the current fiscal year.

Any person who is aggrieved by a citation, order or decision issued under authority delegated to an officer or employee of the state board under Article 8 (commencing with CHSC, Section 116625) or Article 9 (commencing with CHSC, Section 116650), of the Safe Drinking Water Act (CHSC, Division 104, Part 12, Chapter 4), may file a petition with the State Water Board for reconsideration of the citation, order or decision. Appendix 1 to the enclosed Citation contains the relevant statutory provisions for filing a petition for reconsideration (CHSC, Section 116701).

Petitions must be received by the State Water Board within 30 days of the issuance of the citation, order or decision by the officer or employee of the state board. The date of issuance is the date when the

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Division of Drinking Water mails a copy of the citation, order or decision. If the 30th day falls on a Saturday, Sunday, or state holiday, the petition is due the following business day by 5:00 p.m.

Information regarding filing petitions may be found at:

http://www.waterboards.ca.gov/drinking_water/programs/petitions/index.shtml

If you have any questions regarding this matter, please contact Ms. Van Tsang of my staff at (510) 620-3602 or me at (510) 620-3453.

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
Division of Drinking Water
State Water Resources Control Board

Enclosures

Certified Mail No. 7016 2070 0000 9541 6284

cc. San Mateo County Environmental Health

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

Name of Public Water System: Palo Alto Park Mutual Water Company

Water System No: 4110020

Attention: Board President
2190 Addison Avenue
East Palo Alto, CA 94303

Issued: June 18, 2018

**CITATION FOR NONCOMPLIANCE WITH
CALIFORNIA CODE OF REGULATIONS, SECTION 64449 (c)

ALUMINUM MONITORING AND REPORTING VIOLATION

FIRST QUARTER 2018**

The California Health and Safety Code (hereinafter "CHSC"), Section 116650 authorizes the State Water Resources Control Board (hereinafter "State Water Board"), to issue a citation to a public water system when the State Water Board determines that the public water system has violated or is violating the California Safe Drinking Water Act (hereinafter "California SDWA"), (CHSC, Division 104, Part 12, Chapter 4, commencing with Section 116270), or any regulation, standard, permit, or order issued or adopted thereunder.

1 The State Water Board, acting by and through its Division of Drinking Water
2 (hereinafter "Division"), and the Deputy Director for the Division, hereby
3 issues Citation No. 02_17_18C_030 (hereinafter "Citation"), pursuant to
4 Section 116650 of the CHSC to the Palo Alto Park Mutual Water Company
5 (hereinafter "System"), for violation of Section 64449 (c).

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7 A copy of the applicable statutes and regulations are included in Appendix 1,
8 which is attached hereto and incorporated by reference.

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STATEMENT OF FACTS

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The System is classified as a community public water system with an approximate population of 2,500 persons, serving 692 connections. The System operates under Domestic Water Supply Permit No. 02-88-006 issued by the State Water Board on January 25, 1989.

California Code of Regulations (CCR), Section 64449 (c) requires all community water systems to initiate quarterly monitoring and determine compliance with any constituents in Table 64449-A, which includes aluminum, that exceeds a maximum contaminant level. The aluminum concentration for sample collected by System on August 22, 2017 from Well 07 (Primary Station Code 4110020-006) was 0.720 mg/L, which exceeds the aluminum maximum contaminant level of 0.2 mg/L. System was directed by the Division within the October 30, 2017 sanitary survey letter (Attachment 4) to initiate quarterly monitoring for aluminum for Well 07 and at the well blend point (Primary Station Code 4110020-007), beginning fourth quarter 2017. System collected the fourth quarter 2017 samples on December 22, 2017 but failed to monitor for aluminum from Well 07 and at the well blend point during the first quarter

1 2018. The second quarter 2018 samples were collected from Well 07 and at
2 the well blend point on May 24, 2018.

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DETERMINATION

5 The Division has determined that System failed to comply with CCR, Section
6 64449 (c). Specifically, System failed to monitor for aluminum from Well 07
7 and at the well blend point during the first quarter 2018.

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DIRECTIVES

10 The System is hereby directed to take the following actions:

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1. Forthwith, System shall cease and desist from failing to comply with
13 CCR, Section 64449 (c).

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2. By September 30, 2018, and every quarter thereafter, System shall
16 monitor for aluminum from Well 07 and at the well blend point on a
17 quarterly basis. All aluminum results shall be submitted to the Division
18 via Electronic Data Transfer (EDT) by the tenth day of the following
19 month of sample collection.

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3. By July 15, 2018, System shall conduct public notification for the
22 aluminum monitoring and reporting violation in conformance with CCR,
23 Section 64463.4. Use the template included in Appendix 2 to prepare
24 the notice. The notification shall be completed in accordance with the
25 following methods:

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a. Mail and/or direct delivery to all residents, and

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1 b. Posting in conspicuous locations throughout the area served by
2 the water system. The notice shall remain posted for a minimum
3 of seven calendar days.

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5 4. By August 15, 2018, provide to the Division certification of public
6 notification using the enclosed form (Appendix 3). A copy of the notice
7 shall be attached to the certification form.

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9 All submittals required by this Citation shall be electronically submitted to the
10 State Water Board at the following address. The subject line for all electronic
11 submittals corresponding to this Citation shall include the following
12 information: Water System name and number, citation number and title of the
13 document being submitted.

14
15 Eric Lacy, P.E.
16 District Engineer
17 State Water Resources Control Board
18 Division of Drinking Water
19 850 Marina Bay Parkway
20 Building P, 2nd Floor
21 Richmond, CA 94804
22 Eric.Lacy@waterboards.ca.gov
23 DWPDist17@waterboards.ca.gov

24
25 The State Water Board reserves the right to make modifications to this
26 Citation as it may deem necessary to protect public health and safety. Such
27 modifications may be issued as amendments to this Citation and shall be
28 effective upon issuance.

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30 Nothing in this Citation relieves the System of its obligation to meet the
31 requirements of the California SDWA (CHSC, Division 104, Part 12, Chapter

1 4, commencing with Section 116270), or any regulation, standard, permit or
2 order issued or adopted thereunder.

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PARTIES BOUND

5 This Citation shall apply to and be binding upon the System, its owners,
6 shareholders, officers, directors, agents, employees, contractors, successors,
7 and assignees.

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SEVERABILITY

10 The directives of this Citation are severable, and the System shall comply
11 with each and every provision thereof notwithstanding the effectiveness of
12 any provision.

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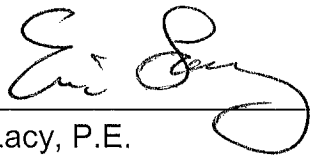
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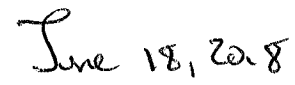
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FURTHER ENFORCEMENT ACTION

The California SDWA authorizes the State Water Board to: issue a citation or order with assessment of administrative penalties to a public water system for violation or continued violation of the requirements of the California SDWA or any regulation, permit, standard, citation, 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 State Water Board to take action to suspend or revoke a permit that has been issued to a public water system if the public water system has violated applicable law or regulations or has failed to comply with an order of the State Water Board, and to petition the superior court to take various enforcement measures against a public water system that has failed to comply with an order of the State Water Board. The State Water Board does not waive any further enforcement action by issuance of this Citation.



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



Date

Appendices:

- 1. Applicable Statutes and Regulations
- 2. Public Notification Template
- 3. Public Notification Certification
- 4. October 30, 2017 Sanitary Survey Letter

Certified Mail No. 7016 2070 0000 9541 6284

**APPENDIX 1. APPLICABLE STATUTES AND REGULATIONS FOR
CITATION NO. 02_17_18C_030
ALUMINUM MONITORING & REPORTING VIOLATION
FOR 1ST QUARTER 2018**

NOTE: The following language is provided for the convenience of the recipient, and cannot be relied upon as the State of California's representation of the law. The published codes are the only official representation of the law. Regulations related to drinking water are in Titles 22 and 17 of the California Code of Regulations. Statutes related to drinking water are in the Health & Safety Code, the Water Code, and other codes.

California Health and Safety Code (CHSC):

Section 116271. Transition of CDPH duties to State Board states in relevant part

(a) The state board succeeds to and is vested with all of the authority, duties, powers, purposes, functions, responsibilities, and jurisdiction of the State Department of Public Health, its predecessors, and its director for purposes of all of the following:

- (1) The Environmental Laboratory Accreditation Act (Article 3 (commencing with Section 100825) of Chapter 4 of Part 1 of Division 101).
- (2) Article 3 (commencing with Section 106875) of Chapter 4 of Part 1.
- (3) Article 1 (commencing with Section 115825) of Chapter 5 of Part 10.
- (4) This chapter and the Safe Drinking Water State Revolving Fund Law of 1997 (Chapter 4.5 (commencing with Section 116760)).
- (5) Article 2 (commencing with Section 116800), Article 3 (commencing with Section 116825), and Article 4 (commencing with Section 116875) of Chapter 5.
- (6) Chapter 7 (commencing with Section 116975).
- (7) The Safe Drinking Water, Water Quality and Supply, Flood Control, River and Coastal Protection Bond Act of 2006 (Division 43 (commencing with Section 75001) of the Public Resources Code).
- (8) The Water Recycling Law (Chapter 7 (commencing with Section 13500) of Division 7 of the Water Code).
- (9) Chapter 7.3 (commencing with Section 13560) of Division 7 of the Water Code.
- (10) The California Safe Drinking Water Bond Law of 1976 (Chapter 10.5 (commencing with Section 13850) of Division 7 of the Water Code).
- (11) Wholesale Regional Water System Security and Reliability Act (Division 20.5 (commencing with Section 73500) of the Water Code).
- (12) Water Security, Clean Drinking Water, Coastal and Beach Protection Act of 2002 (Division 26.5 (commencing with Section 79500) of the Water Code).

(b) The state board shall maintain a drinking water program and carry out the duties, responsibilities, and functions described in this section. Statutory reference to "department," "state department," or "director" regarding a function transferred to the state board shall refer to the state board. This section does not impair the authority of a local health officer to enforce this chapter or a county's election not to enforce this chapter, as provided in Section 116500...

(k)

(1) The state board shall appoint a deputy director who reports to the executive director to oversee the issuance and enforcement of public water system permits and other duties as appropriate. The deputy director shall have public health expertise.

(2) The deputy director is delegated the state board's authority to provide notice, approve notice content, approve emergency notification plans, and take other action pursuant to Article 5 (commencing with Section 116450), to issue, renew, reissue, revise, amend, or deny any public water system permits pursuant to Article 7 (commencing with Section 116625), to suspend or revoke any public water system permit pursuant to Article 8 (commencing with Section 116625), and to issue citations, assess penalties, or issue orders pursuant to Article 9 (commencing with Section 116650). Decisions and actions of the deputy director taken pursuant to Article 5 (commencing with Section 116450) or Article 7 (commencing with Section 116625) are deemed decisions and actions taken by the state board, but are not subject to reconsideration by the state board except as provided in Section 116540. Decisions and actions of the deputy director taken pursuant to Article 8 (commencing with Section 116625) and Article 9 (commencing with Section 116650) are deemed decisions and actions taken by the state board, but any aggrieved person may petition the state board for reconsideration of the decision or action. This subdivision is not a limitation on the state board's authority to delegate any other powers and duties.

Section 116275. Definitions states in relevant part:

(c) "Primary drinking water standards" means:

(1) Maximum levels of contaminants that, in the judgment of the state board, may have an adverse effect on the health of persons.

(2) Specific treatment techniques adopted by the state board in lieu of maximum contaminant levels pursuant to subdivision (j) of Section 116365.

(3) The monitoring and reporting requirements as specified in regulations adopted by the state board that pertain to maximum contaminant levels.

Section 116555. Operational requirements states in relevant part:

- (a) Any person who owns a public water system shall ensure that the system does all of the following:
- (1) Complies with primary and secondary drinking water standards.
 - (2) Will not be subject to backflow under normal operating conditions.
 - (3) Provides a reliable and adequate supply of pure, wholesome, healthful, and potable water.

Section 116577. Enforcement fee states:

(a) Each public water system shall reimburse the state board for actual costs incurred by the state board for any of the following enforcement activities related to that water system:

- (1) Preparing, issuing, and monitoring compliance with, an order or a citation.
- (2) Preparing and issuing public notification.
- (3) Conducting a hearing pursuant to Section 116625.

(b) The state board shall submit an invoice for these enforcement costs to the public water system that requires payment before September 1 of the fiscal year following the fiscal year in which the costs were incurred. The invoice shall indicate the total hours expended, the reasons for the expenditure, and the hourly cost rate of the state board. The costs set forth in the invoice shall not exceed the total actual costs to the state board of enforcement activities specified in this section.

(c) Notwithstanding the reimbursement of enforcement costs of the local primacy agency pursuant to subdivision (a) of Section 116595 by a public water system under the jurisdiction of the local primacy agency, a public water system shall also reimburse enforcement costs, if any, incurred by the state board pursuant to this section.

(d) "Enforcement costs," as used in this section, does not include "litigation costs" pursuant to Section 116585.

(e) The state board shall not be entitled to enforcement costs pursuant to this section if a court determines that enforcement activities were in error.

(f) Payment of the invoice shall be made within 90 days of the date of the invoice. Failure to pay the invoice within 90 days shall result in a 10-percent late penalty that shall be paid in addition to the invoiced amount.

(g) The state board may, at its sole discretion, waive payment by a public water system of all or any part of the invoice or penalty.

Section 116625. Revocation and suspension of permits states:

(a) The state board, after providing notice to the permittee and opportunity for a hearing, may suspend or revoke any permit issued pursuant to this chapter if the state board determines pursuant to the hearing that the permittee is not complying with the permit, this chapter, or any regulation, standard, or order issued or adopted thereunder, or that the permittee has made a false statement or representation on any application, record, or report maintained or submitted for purposes of compliance with this chapter. If the permittee does not request a hearing within the period specified in the notice, the state board may suspend or revoke the permit without a hearing. If the permittee submits a timely request for a hearing, the hearing shall be before the state board or a member of the state board, in accordance with Section 183 of the Water Code and the rules for adjudicative proceedings adopted under Section 185 of the Water Code. If the permit at issue has been temporarily suspended pursuant to subdivision (b), the notice shall be provided within 15 days of the effective date of the temporary suspension order. The commencement of the hearing under this subdivision shall be as soon as practicable, but no later than 60 days after the effective date of the temporary suspension order, unless the state board grants an extension of the 60 day period upon request of the permittee.

(b) The state board may temporarily suspend any permit issued pursuant to this chapter before any hearing when the action is necessary to prevent an imminent or substantial danger to health. The state board shall notify the permittee of the temporary suspension and the effective date of the temporary suspension and, at the same time, notify the permittee that a hearing has been scheduled. The hearing shall be held as soon as possible, but not later than 15 days after the effective date of the temporary suspension unless the state board grants an extension of the 15 day period upon request of the permittee, and shall deal only with the issue of whether the temporary suspension shall remain in place pending a hearing under subdivision (a). The hearing shall be conducted under the rules for adjudicative proceedings adopted by the state board under Section 185 of the Water Code. The temporary suspension shall remain in effect until the hearing under this subdivision is completed and the state board has made a final determination on the temporary suspension, which shall be made within 15 days after the completion of the hearing unless the state board grants an extension of the 15 day period upon request of the permittee. If the determination is not transmitted within 15 days after the hearing is completed, or any extension of this period requested by the permittee, the temporary suspension shall be of no further effect. Dissolution of the temporary suspension does not deprive the state board of jurisdiction to proceed with a hearing on the merits under subdivision (a).

Section 116650. Citations states:

(a) If the state board determines that a public water system is in violation of this chapter or any regulation, permit, standard, citation, or order issued or adopted thereunder, the state board may issue a citation to the public water system. The citation shall be served upon the public water system personally or by certified mail. Service shall be

deemed effective as of the date of personal service or the date of receipt of the certified mail. If a person to whom a citation is directed refuses to accept delivery of the certified mail, the date of service shall be deemed to be the date of mailing.

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

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

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

(e) The state board may assess a penalty in an amount not to exceed one thousand dollars (\$1,000) per day for each day that a violation occurred, and for each day that a violation continues to occur. A separate penalty may be assessed for each violation and shall be in addition to any liability or penalty imposed under any other law.

Section 116701. Petitions to Orders and Decisions states:

(a)

(1) Within 30 days of issuance of an order or decision under authority delegated to an officer or employee of the state board under Article 8 (commencing with Section 116625) or Article 9 (commencing with Section 116650), an aggrieved person may petition the state board for reconsideration.

(2) Within 30 days of issuance of an order or decision under authority delegated to an officer or employee of the state board under Section 116540, the applicant may petition the state board for reconsideration.

(3) Within 30 days of final action by an officer or employee of the state board acting under delegated authority, the owner of a laboratory that was the subject of the final action may petition the state board for reconsideration of any of the following actions:

(A) Denial of an application for certification or accreditation under Section 100855.

(B) Issuance of an order directing compliance under Section 100875.

(C) Issuance of a citation under Section 100880.

(D) Assessment of a penalty under subdivision (e) of Section 100880.

(b) The petition shall include the name and address of the petitioner, a copy of the order or decision for which the petitioner seeks reconsideration, identification of the reason the petitioner alleges the issuance of the order was inappropriate or improper, the specific action the petitioner requests, and other information as the state board may prescribe. The petition shall be accompanied by a statement of points and authorities of the legal issues raised by the petition.

(c) The evidence before the state board shall consist of the record before the officer or employee who issued the order or decision and any other relevant evidence that, in the judgment of the state board, should be considered to implement the policies of this chapter. The state board may, in its discretion, hold a hearing for receipt of additional evidence.

(d) The state board may refuse to reconsider the order or decision if the petition fails to raise substantial issues that are appropriate for review, may deny the petition upon a determination that the issuance of the order or decision was appropriate and proper, may set aside or modify the order or decision, or take other appropriate action. The state board's action pursuant to this subdivision shall constitute the state board's completion of its reconsideration.

(e) The state board, upon notice and hearing, if a hearing is held, may stay in whole or in part the effect of the order or decision subject to the petition for reconsideration.

(f) If an order or decision is subject to reconsideration under this section, the filing of a petition for reconsideration is an administrative remedy that must be exhausted before filing a petition for writ of mandate under Section 100920.5 or 116700.

California Code of Regulations (CCR), Title 22:

§64449. Secondary Maximum Contaminant Levels and Compliance states:

(c) If the level of any constituent in Table 64449-A exceeds an MCL, the community water system shall proceed as follows:

(2) If monitoring less than quarterly, initiate quarterly monitoring and determine compliance on the basis of an average of the initial sample and the next three consecutive quarterly samples collected

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.

Monitoring Requirements Not Met for Palo Alto Park Mutual Water Company

Our water system failed to monitor as required for drinking water standards during the past year and, therefore, was in violation of the regulations. Even though this failure was not an emergency, as our customers, you have a right to know what you should do, what happened, and what we did to correct this 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 fourth quarter 2017 and first quarter 2018 we did not monitor for aluminum from Well 07 and at the blend point 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(s) we did not properly test for during the last year, 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.

<i>Contaminant</i>	<i>Required Sampling Frequency</i>	<i>Number of Samples Taken</i>	<i>When All Samples Should Have Been Taken</i>	<i>When Samples Were or Will Be Taken</i>
Aluminum	1 sample every quarter from Well 07 and well blend point	0	1 st quarter 2018	

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

What happened? What is being done?

[Describe corrective action].

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 COMPLIANCE
Citation Number 02_17_18C_030
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 failure to monitor for aluminum during the first quarter 2018 for Well 07 and at the well blend point.

I complied with the directives of this citation as indicated below:

Required Action

Date Completed

1. Public notification

a. Mail and/or direct delivery

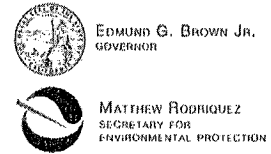
b. Posting in conspicuous places

Signature of Water System Representative

Date

THIS FORM MUST BE COMPLETED AND RETURNED TO THE DEPARTMENT. A COPY OF THE DELIVERED OR MAILED 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.

EDMUND G. BROWN JR.
GOVERNORMATTHEW RODRIGUEZ
SECRETARY FOR
ENVIRONMENTAL PROTECTION

State Water Resources Control Board
 Division of Drinking Water

October 30, 2017

Mr. Fidel Alas
 Board President
 Palo Alto Park Mutual Water Company
 2266 Glen Way
 East Palo Alto, CA 94303

Dear Mr. Alas:

2017 SANITARY SURVEY FINDINGS
Palo Alto Park Mutual Water Company, Water System No. 4110020

This letter is in regards to the October 11, 2017 sanitary survey of the Palo Alto Park Mutual Water Company (PAPMWC) water supply, treatment and distribution system. Ms. Van Tsang and I of the Division of Drinking Water (Division) conducted the inspection in the presence of Ms. Niambi Lincoln, Ms. Katherine Loudd, Ms. Jacqueline Lewis, Mr. Jabari Loudd, Mr. Wilfred Loudd, Mr. Michael Ward, Mr. Mike Frietas and other Board members. We also had the opportunity to discuss with Ms. Kate Elgin and Ms. Joanne Jarin with the San Mateo County Environmental Health (County) regarding PAPMWC's Cross Connection Control Program (CCCP). During the inspection, system facilities including Wells 02, 03, 05, 06 and 07; chlorination facility; the 350,000 gallon and 11,500 gallon storage tanks; and the two booster pumps were visited. The following items discussed during the inspection and noted below require your attention and response. Please respond in writing by **November 30, 2017**.

Compliance with Iron and Manganese Standards

Permit Amendment 1 to the Domestic Water Supply Permit No. 02-88-006 was issued to the PAPMWC on June 29, 2007 to allow the operation of Well 07 using a blending treatment strategy for iron and manganese compliance. The iron and manganese concentrations used to determine the blending strategy were based on water quality samples taken on November 11, 2006 from the wells and are noted below.

Well #	Flow Rate , gpm	Iron, mg/L	Manganese, mg/L
2	125	Nondetect	0.059
3	600	Nondetect	0.015
5	340	Nondetect	0.020
6	325	Nondetect	0.011
7	350	0.480	0.068

FELICIA MARCUS, CHAIR | EILEEN SOBECK, EXECUTIVE DIRECTOR

850 Marina Bay Parkway, Bldg. P, 2nd Floor, Richmond, CA 94804-8403 | www.waterboards.ca.gov

Since the issuance of the amended permit, the iron and manganese concentrations from all five wells have increased above the values obtained from the November 11, 2016 sample. As such, the factors used to establish the operation modes identified within the amended permit are no longer accurate. Furthermore, the iron and manganese samples collected at the blend point (Primary Station Code 4110020-007) for compliance have exceeded their secondary maximum contaminant level (SMCL) of 0.3 mg/L and 0.05 mg/L, respectively, on the following dates:

PS Code	Source Name	Chemical	Sample Date	Result, mg/L
4110020-007	Well Blend Iron/Manganese	Manganese	10/21/2008	0.58
4110020-007	Well Blend Iron/Manganese	Manganese	1/20/2009	0.56
4110020-007	Well Blend Iron/Manganese	Manganese	10/20/2009	2.6
4110020-007	Well Blend Iron/Manganese	Manganese	12/17/2013	0.66
4110020-007	Well Blend Iron/Manganese	Manganese	9/16/2014	0.66
4110020-007	Well Blend Iron/Manganese	Manganese	9/15/2015	0.75
4110020-007	Well Blend Iron/Manganese	Iron	10/21/2008	3.3
4110020-007	Well Blend Iron/Manganese	Iron	6/16/2009	12
4110020-007	Well Blend Iron/Manganese	Iron	4/5/2016	7.4
4110020-007	Well Blend Iron/Manganese	Iron	4/12/2016	3.4

The repeated exceedances at the blend point demonstrates that the current operation mode is not an effective and reliable treatment strategy for iron and manganese compliance. Therefore, PPMWC must proceed with an alternate treatment system that removes the iron and manganese from the source water. As the manganese concentrations from both Wells 02 and 07 and iron concentration from Well 07 exceeds their respective SMCLs, treatment must be provided to both wells. We understand that PPMWC is exploring possible treatment solutions and we look forward to working with you on the treatment selection, design, installation, operation, maintenance and monitoring of that system. Please provide to the Division, by **November 30, 2017** an action plan with significant milestones and timeline to install the iron and manganese removal system.

System Reliability – Infrastructure Improvements

Booster Pumps

The PPMWC water system relies upon two booster pumps to pressurize the distribution system. As you are aware, one of the booster pump failed around July 2016 and was in repair for weeks. We understand that PPMWC can generally meet pressure demands with just one pump. However, relying upon a single pump that has aged puts the system at risk of depressurizing and result in a system wide water outage. As such, PPMWC needs to evaluate the remaining useful life of both booster pumps and develop a Capital Improvement Plan (CIP) to replacing aging infrastructures before they catastrophically fail. Please perform the evaluation and provide a copy of the CIP to the Division by **December 31, 2017**.

Well 03

Well 03 is currently offline due to a failure in the below ground well casing, which also caused sediments to enter the distribution system. The capacity from Well 03 makes up approximately 38 percent of the total production for PAPMWC and is therefore, considered a critical infrastructure of the water system. Please inform the Division by **November 30, 2017** PAPMWC's plan and timeline to either destroy and replace or repair Well 03.

Above Ground Condition of Wells 02, 05 and 07

The above ground features of Wells 02, 05 and 07 are also in poor condition. As seen in figure 1, the well casing of Well 02 has cracked away from the top flange, creating a pathway for contaminants to reach the water supply. Please take immediate actions to seal the opening to prevent the entrance of animals or other sanitary hazards. In addition, please also evaluate the structural integrity of the well casing and make necessary corrections before the well catastrophically fails.

As seen in figures 2 (Well 5) and 3 (Well 7), various above ground components of Wells 05 and 07 are beginning to rust. Please explore options to correct the problem.

Well Building Structures

Groundwater supply wells should be well protect against rodents or other animals. The building structure around Well 02 have separated from the concrete slab, creating an opening at the base of the building (figure 4). The screens on several of the building structures have come loose or fallen off (figure 5). Please secure the buildings to prevent animals from gaining access to the well site.

In addition, chemicals, paint or other solvents should not be stored next to a well site (figure 6). Please immediately remove these containers to prevent contamination of the ground water supply.

Bacteriological Monitoring of Water Main after Installation or Repair

Section 64580 of the California Waterworks Standards (CA WWS) requires newly installed water mains, or water mains that have been taken out of service for maintenance or repair to be disinfected and tested for bacteriological quality in accordance with American Water Works Association (AWWA) Standard C651-05. Samples from new mains must be negative for coliform bacteria prior to the new main(s) being placed into service. AWWA Standard C651-05 states the following:

5.1.1.2 For new mains, sets of samples shall be collected every 1,200 ft (370 m) of the new water main, plus one set from the end of the line and at least one from each branch greater than one pipe length.

5.1.1.3 If trench water has entered the new main during construction or if, in the opinion of the purchaser, excessive quantities of dirt or debris have entered the new main, bacteriological samples shall be taken at intervals of approximately 200 ft (61 m), and the sampling location shall be identified (see Sec. 5.1.3 for sampling location details). Samples shall be taken of water that has stood in the new main for at least 16 hr after final flushing has been completed.

5.1.2.1 For repaired mains that were depressurized and/or wholly or partially dewatered, one set of samples may be required, and depending upon the sanitary conditions, the line may be reactivated prior to the completion of bacteriological testing. Samples shall be collected downstream of the repair site and at

intervals of approximately 200 ft (61 m) within the length of pipe that was shut down. If direction of flow is not known, samples shall be collected on either side of the repair site.

According to the PPMWC records, water mains were either installed or repaired during four separate incidents since 2016. Bacteriological samples were not collected in accordance with the AWWA Standard after each main activity. As such, it is uncertain if the water quality served to the PPMWC community was compromised at that time.

PPMWC is hereby required to immediately notify the Division of all future installation, replacement or repair to your water mains. The notification must include the following:

- Location, size and condition of water main
- Number of customers affected
- Staff and/or contract professionals performing the water main work
- Specific procedures for disinfecting the water main
- Address of the bacteriological sample site(s)

A copy of the bacteriological quality result must be automatically submitted to the Division by the contact laboratory. Enforcement actions may be taken for failure to comply with the disinfection and bacteriological monitoring requirements of the CA WWS for future water main activities.

Customer Complaints

Review of the complaint forms indicate that PPMWC has received several customer complaints regarding the taste, odor, color, turbidity and/or pressure of the water supplied to the community. The forms however did not discuss the possible cause(s) of these issues, measures taken to address the complaints and results of the actions. Please discuss within the **November 30, 2017** response letter PPMWC's procedures for responding to and follow-up actions to address all customer complaints. All complaint forms must include sufficient information to demonstrate that the complaints were adequately addressed. Please submit as part of the Annual Report to the Division detail records of all customer complaints.

Aluminum Concentration from Well 07

The aluminum concentration from Well 07 for a sample collected on August 22, 2017 was 0.720 mg/L, which exceeds the aluminum SMCL of 0.2 mg/L. Section 64449 (c)(1), Chapter 15, Title 22 of the California Code of Regulations states that if the level of any constituent in Table 64449-A, which includes aluminum, exceeds an MCL, the community water system shall initiate quarterly monitoring and determine compliance on the basis of an average of the initial sample and the next three consecutive quarterly samples collected. As such, quarterly monitoring for aluminum must be initiated for Well 07, with the next sample due by December 31, 2017. In addition, aluminum monitoring must also be conducted at the blend point on the same date as the sample from Well 07 to determine the aluminum level served to the community.

Cross Connection Control Program

The PPMWC currently contracts with the County to administer your CCCP. According to County records, there are currently four backflow devices installed within the PPMWC system:

- Dumbarton Avenue – Residential connection with private well. Reduced Pressure Principle Backflow Prevention Device (RP) installed at the service meter.
- Palo Verde Street – Residential connection with private well. RP installed at service meter.
- Addison Street – Double check valve assembly (DC) installed on a fire suppression system.
- Wash & Go Laundry – DC installed on a fire suppression system.

It was noted during inspection that a cross connection control survey has not been conducted of all premises for potential health hazard to the public water system. As such, it is uncertain if there are additional private wells within the PAPMWC service area. Therefore, by **December 31, 2017**, please provide to the Division an action plan and schedule to complete the cross connection control survey and install the appropriate backflow prevention devices, as needed.

Records of Hydrant Flushing and Valve Maintenance

PAPMWC is commended for proactively flushing all hydrants located at dead ends every two weeks and the rest of the distribution system once per quarter. In addition, all valves are exercised once a year. The flushing records indicate that the hydrants are flushed for five minutes. Please include the following information on all flushing and valve maintenance records:

- Flushing velocity
- Size of water main
- Condition of hydrant or valve
- Type and size of valve
- Water quality condition at the start and end of flushing – chlorine residual, turbidity and pH
- Name of staff who performed the system maintenance

The records will be reviewed by Division staff during future inspections of the PAPMWC.

Sample taps on Wells

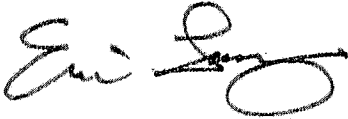
Section 64560(c)(3)(2) of the CA WWS specifies that public water supply wells shall be equipped with a non-threaded sample tap located on the discharge line between the wellhead and check valve. Sampling taps used for obtaining samples for bacteriological analysis shall not have a screen, aerator, or other such appurtenances. Taps should also be protected from potential sanitary hazards, such as animals and outdoor elements. Furthermore, the taps should provide a laminar flow for sample collections, especially for VOC analyses. Please remove the vacuum breaker and threads off the sample tap on the wells. We recommend PAPMWC install a dedicated, protected and down turned gooseneck sampled tap on all wells and at locations used for compliance monitoring.

Succession Planning

It was mentioned during the inspection that Ms. Katherine Loudd will be stepping down as the manager overseeing the operation of the PAPMWC water system and Ms. Niambi Lincoln will be assuming the role. We appreciate the positive working relationship with and assistance provided by Ms. Loudd over the years and wish her all the best in her retirement. We look forward to working with Ms. Lincoln on the many great improvement to the PAPMWC water system.

The Division appreciates the assistance provided by the PAPMWC Board, operation staff, Mr. Frietas, Ms. Elgin and Ms. Jarin during the inspection. If you have any questions regarding this letter, please contact Ms. Van Tsang at (510) 620-3602.

Sincerely,

A handwritten signature in black ink, appearing to read "Eric Lacy", with a stylized flourish at the end.

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

cc: San Mateo County Environmental Health