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GOVERNOR

MATTHEW RODRIGUEZ
SECRETARY FOR
ENVIRONMENTAL PROTECTION

State Water Resources Control Board
Division of Drinking Water

September 16, 2016

System No. 0310012

Damon Wyckoff, Operations Manager
Amador Water Agency
12800 Ridge Road
Sutter Creek, CA 95685

TRANSMITTAL OF CITATION NO. 01-10-16C-010 FOR TCR MCL FAILURE

Dear Mr. Wyckoff,

The Amador Water Agency's (AWA) Buckhorn water system violated the Maximum Contaminant Level (MCL) for total coliform bacteria during the month of August 2016, as specified in the Domestic Water Quality and Monitoring Regulations, Chapter 15, Title 22, California Code of Regulations (CCR). The State Water Resources Control Board, Division of Drinking Water (Division) has issued Citation No. 01-10-16C-010, in response to this violation. The citation is being transmitted to AWA under cover of this letter.

Please respond to the Directives of this Citation by the deadlines established with each item. If you have any questions regarding this Citation, please contact Tahir Mansoor by email at Tahir.Mansoor@Waterboards.ca.gov or by phone at (209) 948-3879.

Sincerely,

A handwritten signature in blue ink, appearing to read "Bhupinder S. Sahota".

Bhupinder S. Sahota, P.E.
District Engineer, Stockton District
Drinking Water Field Operations Branch

Attachments: Citation No. 01-10-16C-010
Certified Mail No. 7004 2890 0002 0058 1341

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FELICIA MARCUS, CHAIR | THOMAS HOWARD, EXECUTIVE DIRECTOR

31 E. Channel Street, Room 270, Stockton, CA 95202 | www.waterboards.ca.gov



1 Creek, CA 95685) for violation of California Code of Regulations (CCR), Title 22,
2 Section 64426.1 subsection (b)(2).

3
4 **APPLICABLE AUTHORITIES**

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

6
7 (a) If the Division determines that a public water system is in violation
8 of this chapter or any regulation, permit, standard, citation, or order issued or
9 adopted thereunder, the Division may issue a citation to the public water system.
10 The citation shall be served upon the public water system personally or by certified
11 mail. Service shall be deemed effective as of the date of personal service or the
12 date of receipt of the certified mail. If a person to whom a citation is directed refuses
13 to accept delivery of the certified mail, the date of service shall be deemed to be the
14 date of mailing.

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

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

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

22 (e) The Division may assess a penalty in an amount not to exceed one
23 thousand dollars (\$1,000) per day for each day that a violation occurred, and for
24 each day that a violation continues to occur. A separate penalty may be assessed for
25 each violation.
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27

1 **California Code of Regulations, Title 22, Section 64426.1, subsection (b)(2)**
2 **provides, in relevant part:**

3
4 (b) A public water system is in violation of the total coliform Maximum Contaminant
5 Level (hereinafter MCL) when any of the following occurs:

6 (2) For a public water system which collects fewer than 40 samples per month, more
7 than one sample collected during any month is total coliform-positive.

8
9 **California Code of Regulations, Title 22, Section 64426, Subsection (a)(3)**
10 **provides, in relevant part:**

11
12 (a) Any of the following criteria shall indicate a possible significant rise in bacterial
13 count:

14 (3) A system fails the total coliform MCL as defined in Section 64426.1.

15
16 **STATEMENT OF FACTS**

17 The AWA's Buckhorn water system operates under the authority of a Domestic
18 Water Supply Permit, No. 03-10-05P-001, granted by the Division on June 14, 2005.

19
20 The consolidated Central Amador Water Project (CAWP) water treatment
21 plant/system is owned by AWA and is a large wholesale type water system, which
22 supplies treated water to 11 water systems along Highway 88 in central Amador
23 County. The consolidated CAWP plant's treated water is delivered to the other retail
24 water systems via the CAWP transmission pipeline, which consists of about 11 miles
25 of pipeline along State Highway 88 from Sunset Heights, approximately one mile
26 west of Pine Grove to Ridgeway Pine, approximately six miles northeast of Pioneer.

1 The AWA operates and maintains all of the associated pumping, treatment, storage,
2 and transmission facilities.

3
4 The Buckhorn Water System serves approximately 9,413 permanent residents
5 through 2,619 service connections. Based on the reported population and number
6 of service connections, the AWA is required to have three samples examined for
7 bacteriological quality every week from the Buckhorn distribution system.

8
9 On August 23, 2016, the AWA collected three routine samples for bacteriological
10 quality from the designated sites in the Buckhorn distribution system. One sample,
11 collected from Lot 57 – Meirkey Drive, tested positive for total coliform bacteria. The
12 sample was negative for E. coli bacteria.

13
14 On August 25, 2016, the AWA collected three repeat distribution system samples
15 (one sample each from the routine coliform positive sample location, the
16 downstream, and the upstream locations). One of the repeat distribution samples
17 collected from 12201 Meirkey Drive, tested positive for total coliform bacteria
18 (negative for E. coli bacteria). The sample from the original positive site and from
19 the other repeat site tested negative for total coliform bacteria. All three sites were
20 again tested on August 26, 2016, and tested negative for total coliform bacteria.

21
22 The AWA collects fewer than 40 samples per month; therefore, two positive total
23 coliform samples constitute failure of the total coliform MCL for August 2016, per
24 Section 64426.1(b)(2), Title 22, CCR.

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1 **DETERMINATION**

2 The Division has determined that the Buckhorn Water System failed to comply with
3 the requirements of Section 64426.1(b)(2) due to the fact that the Buckhorn Water
4 System is in violation of the total coliform MCL because the water system collects
5 fewer than 40 samples per month, and more than one sample collected during the
6 month of August 2016 was total coliform positive. Therefore the Buckhorn Water
7 System is in violation of Section 64426.1, subsection (b)(2), of the CCR for the month
8 of August 2016.

9
10 **DIRECTIVES**

11 The AWA is hereby directed to take the following actions:

12
13 1. By **September 30, 2016**, notify the consumers served by the Buckhorn Water
14 System of the bacteriological quality (Total Coliform Rule) failure in
15 conformance with Section 64463.4 (a)(1), Title 22, CCR. The notification
16 shall be provided in accordance with the following:

17
18 a. Provide written notice of the bacteriological water quality MCL violation
19 by mail or by direct hand delivery to every customer and by publication
20 of a notice in a newspaper of general circulation in the Buckhorn area
21 served by the AWA. The notice shall be published and delivered once,
22 no later than the above mentioned date.

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24 This notification shall be given in English. In addition, if the Buckhorn
25 Water System serves a large proportion of other non-English speaking
26 consumers, notices must contain some information in the appropriate

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language(s) on the importance of the notice as provided in the Division's guidance for the Consumer Confidence Report (CCR).

b. The contents of the notice, including the mandatory language, shall be approved by the Division prior to publication and delivery.

c. Within ten (10) days following publication and delivery of the notice, the AWA shall submit to the Division a copy of the notification including certification of its publication and delivery.

2. By **September 23, 2016**, the AWA shall conduct and submit Level 1 assessment in accordance to the Federal revised Total Coliform Rule. A form that should be used to meet this requirement has already been provided to the AWA electronically.

3. By **September 30, 2016**, the AWA shall submit a written response to the Division indicating its willingness to comply with the directives of this Citation.

4. Comply with Section 64426.1, Title 22, CCR, in all future monitoring periods.

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.

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

4

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

7

8 Bhupinder S. Sahota, P.E.
9 District Engineer, Stockton District
10 State Water Resources Control Board
11 Division of Drinking Water
12 31 E. Channel Street, Room 270
13 Stockton, CA 9202

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PARTIES BOUND

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

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SEVERABILITY

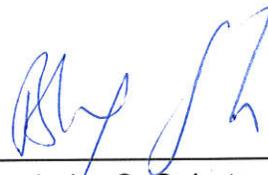
20 The Directives of this Citation are severable, and the AWA shall comply with each
21 and every provision thereof, notwithstanding the effectiveness of any other provision.
22

FURTHER ENFORCEMENT ACTION

The California SDWA authorizes the Board 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 Board to take 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 Board; 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 Board. The Board does not waive any further enforcement action by issuance of this citation.

9/16/2016

Date



Bhupinder S. Sahota, P.E.,
District Engineer, Stockton District
Division of Drinking Water
State Water Resources Control Board

Attachments:

1. Public Notification
2. Proof of Notification Form
3. Level 1 Assessment Form



Certified Mail No. 7004 2890 0002 0058 1341

Amador Water Agency
12800 Ridge Road
Sutter Creek, CA 95685

September 16, 2016

Dear Customers:

Este informe contiene información muy importante sobre su agua potable.
Para esta información en Español, llame al (209) 869-7128.

During the month of August 2016, the Amador Water Agency's (AWA) Buckhorn water system failed the maximum contaminant level (MCL) for total coliform bacteria indicative of the water quality standards for bacteriological quality as prescribed by the California Domestic Water Quality and Monitoring Regulations. Fecal coliform/E. coli were absent in all total coliform positive samples.

The State Water Resources Control Board, Division of Drinking Water (Division) sets drinking water standards and has determined that the presence of total coliform is a possible health concern. Total coliform are common in the environment and are generally not harmful themselves. The presence of these bacteria in drinking water; however, generally is a result of a problem with water treatment or the pipes, which distribute the water, and indicates that the water may be contaminated with organisms that can cause disease. Disease symptoms may include diarrhea, cramps, nausea, and possibly jaundice, and any associated headaches and fatigue. These symptoms, however, are not just associated with disease-causing organisms in drinking water, but may also be caused by a number of factors other than your drinking water. The Division has set an enforceable drinking water standard for total coliform to reduce the risk of these adverse health effects. Under this standard, no more than 5.0 percent of the samples collected during a month can contain these bacteria, except that systems collecting fewer than 40 samples/month that have one total coliform positive per month are not violating the standard. Drinking water, which meets this standard is usually not associated with a health risk from disease causing bacteria and should be considered safe.

The finding of coliform bacteria in routine samples necessitated the issuance of this notice to all consumers of Buckhorn water system. After additional repeat samples that were negative for coliform bacteria, the water was determined to be safe for drinking. The AWA completed all bacteriological testing, in accordance with the requirements of the State Water Resources Control Board, Division of Drinking Water. Follow up actions included confirmation sampling.

No further action is required on your part at this time.

Consumers wishing more information should contact Damon Wyckoff, Operations Manager, of the AWA at (209) 257-5284.

PROOF OF NOTIFICATION

As required by Section 116450 of the California Health and Safety Code, I notified all users that _____ failed the Total Coliform MCL during December 2014.

Notification was made on _____ by _____
(date)

_____ written notice.
hand delivery or posted (circle one)

Signature of Water System Representative

(date)

DISCLOSURE: Be advised that Section 116725 and 116730 of the California Health and Safety Code state that any person who knowingly makes any false statement on any report or document may be liable for a civil penalty not to exceed five thousand (5,000) for 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 the county jail not to exceed one year, or by both the fine and imprisonment.

Due By: September 30, 2016
Failed Total Coliform MCL: August 2016
System Number: 0310012
Citation No.: 01-10-16C-010

REVISED TOTAL COLIFORM RULE (RTCRR) – LEVEL 1 ASSESSMENT FORM

Simple Systems with a Well and Pressure Tank and No Treatment

Page 2 of 5

STORAGE	TANK (name)	TANK (name)	TANK (name)	TANK (name)	COMMENTS
5. Is the roof/cover of the tank sealed and free of any leaks?					
6. Is the tank above ground or buried? a. If buried or partially buried, are there provisions to direct surface water away from the site. b. Has the interior of the tank been inspected to identify any sanitary defects, such as root intrusion?					
7. Does the tank "float" on the distribution system or are there separate inlet and outlet lines?					
8. What is the measured chlorine residual (total/free) of the water exiting the storage tank today?					
9. What is the volume of the storage tank in gallons?					
10. Is the tank baffled?					
11. Prior to the TC+ or EC+, what was the previous date item #1-6 were checked and documented?					

PRESSURE TANK	TANK (name)	TANK (name)	TANK (name)	TANK (name)	COMMENTS
1. What is the volume of the pressure tank?					
2. What is the age of the pressure tank?					
3. Is the pressure tank bladder type or air compressor type?					
4. Did the pressure tank(s) deviate from normal operating pressure?					
5. Is the compressor pump running more often than normal?					
6. Is the tank bladder broken and the tank water logged?					
7. Is the tank(s) damaged, rusty, leaking, or has holes?					
8. Was there any recent work performed?					
9. Is the air relief vent (if there is one) on the pressure tank screened and facing downwards?					
10. Can the inside of the pressure tank be visually inspected thru an inspection port? If so, when was the last time it was inspected?					

DISTRIBUTION SYSTEM	SYSTEM RESPONSES			
1. What is the minimum pressure you are maintaining in the distribution system?				
2. Did pressure in the distribution system drop to less than 5 psi prior to experiencing the total coliform positive finding?				
3. Has the distribution system been worked on within the last week? (service taps, hydrant flushing, main breaks, main extensions, etc.) If yes, provide details.				

REVISED TOTAL COLIFORM RULE (RTCR) – LEVEL 1 ASSESSMENT FORM

Simple Systems with a Well and Pressure Tank and No Treatment

DISTRIBUTION SYSTEM	SYSTEM RESPONSES
4. Are there any signs of excavations near your distribution system not under the direct control of your maintenance staff?	
5. Did you inspect your distribution system to check for mainline leaks? Do you or did you have a mainline leak?	
6. If there was a mainline leak, when was it repaired?	
7. On what date was the distribution system last flushed?	
8. Is there a written flushing procedure you can provide for our review?	
9. Do you have an active cross connection control program?	
10. What is name and phone number of your Cross-Connection Control Program Coordinator?	
11. Have all backflow prevention devices in the distribution system been tested annually and repaired/replaced if they did not pass and retested afterwards?	
12. On what date was the last physical survey of the system done to identify cross-connections?	

SAMPLE SITE EVALUATION (Complete for all TC+ or EC+ findings)	Routine Site TC+ or EC+	Upstream Site	Downstream Site	4 th Repeat Sample (specify)
1. What is the height of the sample tap above grade? (inches)				
2. Is the sample tap located in an exterior location or is it protected by an enclosure?				
3. Is the sample tap threaded, have a swing arm (kitchen sink) or aerator (sinks)?				
4. Is the sample tap in good condition, free of leaks around the stem or packing?				
5. Can the sample tap be adjusted to the point where a good laminar flow can be achieved without excessive splash?				
6. Is the sample tap and area around the sample tap clean and dry (free of animal droppings, other contaminants or spray irrigation systems)				
7. Is the area around the sample tap free of excessive vegetation or other impediments to sample collection?				
8. Describe how the tap was treated in preparation for sample collection (ran water, swabbed with disinfectant, flamed, etc.)				
9. Is this sample tap designated on the bacteriological sample siting plan (BSSP) as a routine or repeat site?				
10. Were the samples delivered to the laboratory in a cooler and within the allowable holding time?				
11. What were the weather conditions at the time of the positive sample (rainy, windy, sunny)?				

REVISED TOTAL COLIFORM RULE (RTCRR) – LEVEL 1 ASSESSMENT FORM

Simple Systems with a Well and Pressure Tank and No Treatment

GENERAL OPERATIONS:	Response
1. Has the sampler(s) who collected the samples received training on proper sampling techniques? If yes, please indicate date of last training.	
2. Does the water system have a written sampling procedure and was it followed?	
3. Where there any power outages that affected water system facilities during the 30 days prior to the TC+ or EC + findings?	
4. Were there any main breaks, water outages, or low pressure reported in the service area from which TC+ or EC+ samples were collected?	
5. Does the system have backup power or elevated storage?	
6. During or soon after bacteriological quality problems, did you receive any complaints of any customers' illness suspected of being waterborne? How many?	
7. What were the symptoms of illness if you received complaints about customers being sick?	

SUMMARY: Based on the results of your assessment and any other available information, what deficiencies do you believe to have caused the positive total coliform sample(s) within your distribution system? (DO NOT LEAVE BLANK)

Deficiency #	Deficiency Description
1.	
2.	
3.	
4.	
5.	

CORRECTIVE ACTIONS: What actions have you taken to correct the above mentioned deficiencies? If additional time is needed to correct a deficiency, indicate the date that it will be corrected. (DO NOT LEAVE BLANK)

Deficiency #	Corrective Action	Completion/Proposed Date
1.		
2.		
3.		
4.		
5.		

REVISED TOTAL COLIFORM RULE (RTCR) – LEVEL 1 ASSESSMENT FORM
Simple Systems with a Well and Pressure Tank and No Treatment

Page 5 of 5

CERTIFICATION: I certify under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

NAME: _____ **TITLE:** _____ **DATE:** _____

Upon review of the Level 1 Assessment Form, the local regulatory agency may require submittal of the following additional information:

- Sketch of system showing all sources, all treatment and chlorination locations, storage tanks, microbiological sampling sites and general layout of the distribution system including the location of all hazardous connections such as the wastewater treatment facility.
- A set of photographs of the source, pressure tanks, and storage tanks in the system may be submitted if they would show that the contamination is directly related and changes have been made since the last inspection by the local regulatory agency.
- Name, certification level and certificate number of the Operator in Responsible Charge.
- Copy of the last cross connection survey performed that identifies the location of all unprotected cross connections.

