

STATE OF CALIFORNIA
DEPARTMENT OF PUBLIC HEALTH

IN RE: **DOUBLE L MOBILE RANCH PARK**
Water System No. 1000248

TO: Carl Hunt
Double L Mobile Ranch Park
648 N. Monte
Fresno, CA 93728

CITATION FOR NONCOMPLIANCE
TOTAL COLIFORM MAXIMUM CONTAMINANT LEVEL VIOLATION

March 2014

Issued on May 23, 2014

Section 116650, Chapter 4, Part 12, Division 104 of the California Health and Safety Code (CHSC), authorizes the issuance of a citation for failure to comply with a requirement of the California Safe Drinking Water Act, or any regulation, standard, permit, or order issued hereunder.

VIOLATION

The Drinking Water Field Operations Branch of the California Department of Public Health (hereinafter 'Department') hereby issues a Citation to Double L Mobile Ranch Park (hereinafter 'Water System'), for failure to comply with Section 116555(a)(1) of the CHSC and Section 64426.1(b)(2) of Title 22, California Code of Regulations (CCR). Specifically, the Water System (mailing address: 648 N. Monte, Fresno, CA 93728) failed to comply with the total coliform Maximum Contaminant Level (MCL) for the month of March 2014.

1 The Water System operates under a domestic water supply permit issued by the Department
2 on July 29, 2011. Double L Mobile Ranch Park is a community water system serving a
3 population of approximately eighty (80) persons through thirty seven (37) service
4 connections.

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6 Section 64426.1(b)(2) specifies that a public water system collecting fewer than 40 samples
7 per month is in violation of the total coliform MCL when more than one sample collected
8 during any month is total coliform-positive.

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10 The Water System is required to collect a minimum of one (1) distribution system
11 bacteriological sample per month. The bacteriological water analysis results submitted by
12 the Water System reported the presence of total coliform bacteria in five (5) of nine (9)
13 samples collected by the Water System in March 2014. None of the positive samples
14 showed the presence of fecal coliform or *E. coli* bacteria.

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16 Upon being informed of the presence of total coliform bacteria in one routine sample
17 collected on March 5, 2014, Water System staff collected a total of four repeat samples,
18 including two from the well, on March 7, 2014. The proper number of repeat samples was
19 collected, however the guidelines for collecting an upstream sample and a downstream
20 sample were not followed. All of the samples showed the presence of total coliform
21 bacteria; none of the positive samples showed the presence of fecal coliform or *E. coli*
22 bacteria. Additional repeat samples were collected at four distribution locations on March
23 17, 2014. None of those samples were positive for total coliform bacteria. Due to the above-
24 mentioned total coliform positive samples, the Water System failed the total coliform MCL
25 for the month of March 2014. All water samples for coliform bacteria collected during
26 2013 and 2014 are summarized in Attachment A.

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1 The cause of the contamination is unknown as no investigational forms have been returned
2 to the Department. It is suspected that the well was contaminated. Two well cycle tests have
3 been completed following the positive coliform findings in March 2014. One well cycle test
4 was conducted on March 26, 2014 in which two of five samples were positive for total
5 coliform bacteria and negative for fecal coliform and *E. Coli* bacteria. Another well cycle
6 test was conducted on April 29, 2014 in which all five samples were negative for total
7 coliform bacteria. The Department has required the Water System to install emergency
8 chlorination for one month until the source of the contamination can be identified.

9
10 The California Groundwater Rule requires the collection of a sample for bacteriological
11 evaluation from wells serving the system in response to a coliform positive distribution
12 sample. This requirement was met with the first round of repeat sampling conducted by the
13 Water System on March 7, 2014.

14 15 **ASSOCIATED VIOLATIONS**

16 Additionally, the Water System has failed to comply with the following Section 64424 of
17 Title 22, CCR:

18 Sections 64424(a)1 and 64424(b) specify that for systems collecting only one sample per
19 month or quarter, a repeat sample set shall consist of four (4) samples as follows: one (1)
20 from the routine sample site at which the positive occurred, one (1) from the upstream
21 repeat sample site, one (1) from the downstream repeat sample site and one (1) from the
22 operating well or another location within the system that would best help to identify the
23 source or area of contamination. Initially, four repeat samples were collected, however two
24 were from the well and the other two were from distribution sites, neither of which was the
25 original sample site that tested positive.

26 27 **NOTIFICATION REQUIREMENTS**

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Section 64426.1(c) requires a public water system to notify the Department and the consumers of the water system, when a violation of Section 64426.1(b)(1) through (4) occurs. Notification to the Department shall be by the end of the business day on which the violation has been determined. If the Department is closed, notification shall be within 24 hours of the determination. **The Department was notified on March 10, 2014 in accordance with the above-referenced section.**

A Tier 2 Public Notice for violation of paragraph 64426.1(b)(2) shall be given pursuant to Section 64463.4 and 64465. The Tier 2 Public Notice shall include the mandatory health effects language from Appendix 64465-A for a total coliform MCL failure.

Section 64463.4 allows community water systems to use mail or direct delivery to each customer and the use of one or more of the following methods: publication in a daily or weekly newspaper, posting the public notice in a conspicuous public place within the water system or on the internet, or by delivery to community organizations. The Tier 2 Public Notice that was provided electronically to Water System staff on March 10, 2014 is included again here as Attachment B.

Proof of notification is required. The Water System shall complete Attachment C and return it to the Department by **June 15, 2014**.

DIRECTIVES

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

1. By **June 1, 2014**, the Double L Mobile Ranch Park water system shall provide public notification of the total coliform Maximum Contaminant Level failure by mail or

1 conduct direct delivery of the public notice provided as Attachment B to all customers
2 served within the general service area.

3
4 By **June 15, 2014**, the Water System shall provide proof of public notification of the
5 total coliform MCL violation by completing Attachment C and returning it to:

6
7 Betsy S. Lichti, Senior Sanitary Engineer
8 Department of Public Health
9 Drinking Water Field Operations Branch
10 265 W. Bullard Avenue, Suite 101
11 Fresno, CA 93704

12 2. Sections 64424(a)1 and 64424(b) specifies that for systems collecting only one
13 sample per month or quarter, a repeat sample set shall consist of four (4) samples as
14 follows: one (1) from the routine sample site at which the positive occurred, one (1)
15 from the upstream repeat sample site, one (1) from the downstream repeat sample
16 site and one (1) from the operating well or another location within the system that
17 would best help to identify the source or area of contamination.

18 3. By **June 15, 2014**, the Water System shall submit a Bacteriological Sample Siting
19 Plan (BSSP). Guidance for the Development of a BSSP is provided here as
20 Attachment D.

21
22 4. By **June 15, 2014**, the Water System shall complete and submit the enclosed
23 “Positive Total Coliform Investigation” form to the Department that describes the
24 incident and all corrective actions taken, and the results of the investigation. The
25 appropriate investigation report is provided as Attachment E.
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5. In the event that chlorination is still being provided after **May 31, 2014**, an application (Form EH 100, Attachment F) for a permit amendment for the addition of continuous chlorination treatment must be submitted to the Department. A permit fee of \$258 shall be included at the time the application is submitted to the Department. While the Water System is being chlorinated monthly raw water bacteriological samples should be collected from the wellhead and analyzed, and chlorine residuals should be monitored throughout the distribution system.

CIVIL PENALTIES

Sections 116650(d) and 116650(e) of the CHSC allow for the assessment of a civil penalty for failure to comply with requirements of the California Safe Drinking Water Act. Failure to comply with any provision of this Citation may result in the Department imposing an administrative penalty of not less than \$100 (one hundred dollars) per day as of the date of violation of any provision of this Citation.

5/23/14
Date

Betsy Lichti
Betsy S. Lichti, P.E.
Senior Sanitary Engineer, Fresno District
DRINKING WATER FIELD OPERATIONS BRANCH



- BSL/el
Attachments:
Attachment A: Summary of Bacteriological Samples collected in 2013 and 2014
Attachment B: Public Notice Template
Attachment C: Proof of Notification Form
Attachment D: Guidance for the Development of a BSSP
Attachment E: Positive Total Coliform Investigation Form
Attachment F: Permit Amendment Application Form

Bacteriological Distribution Monitoring Report

1000248 Double L Mobile Ranch Park
Distribution System Freq: 1/M

Sample Date	Time	Location	T Coli	E Coli	F Coli	Type	Cl2	Violation	Comment
1/10/2013	13:00	Space 2	A	A		Routine			
1/10/2013	13:10	space 15	A	A		Routine			
1/10/2013	13:20	Space 30	A	A		Routine			
2/20/2013	11:00	Space 2	A	A		Routine			
2/20/2013	11:15	Space 2	A	A		Routine			
2/20/2013	11:25	Space 30	A	A		Routine			
2/20/2013	11:40	Space 15	A	A		Routine			
2/20/2013	11:55	space 15	A	A		Routine			
3/11/2013	15:40	Space 2	A	A		Routine			
4/12/2013	14:30	Space 2 hb	A	A		Routine			
5/21/2013	14:30	Space 2 HB	A	A		Routine			
6/19/2013	15:30	Space 2	A	A		Routine			
7/9/2013	12:00	Space 2	A	A		Routine			
8/15/2013	11:15	Space 2	A	A		Routine			
9/25/2013	13:00	Space #2	A	A		Routine			
10/10/2013	12:00	Space 2	A	A		Routine			
11/22/2013	16:00	Space 2	A	A		Routine			
12/6/2013	9:45	Space 2	A	A		Routine			
1/13/2014	14:25	Space 2	A	A		Routine			
1/13/2014	14:35	Space 30	A	A		Routine			
1/13/2014	14:48	Space 15	A	A		Routine			
2/13/2014	11:50	Space 15	A	A		Routine			
2/13/2014	12:05	Space 2	A	A		Routine			
2/13/2014	12:15	Space 30	A	A		Routine			
3/5/2014	14:30	Space 2	P	A		Routine			
3/7/2014	10:30	Well 2	P	A		Source Repeat			
3/7/2014	10:40	Space 30	P	A		Repeat		MCL	
3/7/2014	11:00	Space 15	P	A		Repeat			
3/7/2014	11:10	Well 2	P	A		Source Repeat			
3/17/2014	10:30	Space 12	A	A		Repeat	1.1		
3/17/2014	10:35	Space 15	A	A		Repeat	0.82		
3/17/2014	10:45	Space 30	A	A		Repeat	1.1		
3/17/2014	10:50	Well Head #2	<1.0	<1.0		Source Repeat	0.0		
4/29/2014	14:38	Space #2	A	A		Routine	2.0		
4/29/2014	14:50	Space #15	A	A		Routine	1.9		
4/29/2014	14:55	Space #30	A	A		Routine	2.0		
4/29/2014	15:05	Space #2	A	A		Routine			
4/29/2014	15:10	Space #15	A	A		Routine			

Violation Key

MCL	Exceeds the maximum contaminant level	MR5	Incorrect number of repeat samples as follow-up to a positive sample
MR1	No monthly sample for the report month	MR6	No source sample
MR2	No quarterly sample for the report month	MR7	No summary report submitted
MR3	Incorrect number of routine samples for the report month	MR8	Other comments and/or info
MR4	Did not collect 5 routine samples for previous month's positive sample	MR9	Cl2 not reported

Source Bacteriological Monitoring Report

1000248 Double L Mobile Ranch Park

<i>Sample Date</i>	<i>Time</i>	<i>Source</i>	<i>Sample Type</i>	<i>Test Method</i>	<i>T Coli</i>	<i>E Coli</i>	<i>F Coli</i>	<i>HPC</i>	<i>Violation</i>	<i>Comments</i>
1/10/2013	1:35	Well Head 2	Well	MPN	<1.0	<1.0				
1/13/2014	14:25	Well Head 2	Well	MPN	<1.0	<1.0				
2/13/2014	12:00	Well Head	Well	P/A	A	A				
3/17/2014	10:50	Well Head 2	Well	MPN	<1.0	<1.0				
3/26/2014	10:30	well head 1st discharge	Well	MPN	<1.0	<1.0				
3/26/2014	10:31	Well Head 5 min	Well	MPN	5.2	<1.0				
3/26/2014	10:45	Well Head 15 min	Well	MPN	<1.0	<1.0				
3/26/2014	11:00	Well Head 30 min	Well	MPN	1.0	<1.0				
4/29/2014	15:20	Well Start up	Well Cycle	MPN	<1.0	<1.0				
4/29/2014	15:21	Well 1 min	Well Cycle	MPN	<1.0	<1.0				
4/29/2014	15:25	Well Head 5 min	Well Cycle	MPN	<1.0	<1.0				
4/29/2014	15:35	Well Head 15 min	Well Cycle	MPN	<1.0	<1.0				
4/29/2014	15:50	Well 30 min	Well Cycle	MPN	<1.0	<1.0				

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.

**Double L Mobile Ranch Park Has Levels of Coliform Bacteria
Above the Drinking Water Standard**

Our water system recently failed a drinking water standard. Although this incident 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 routinely monitor for drinking water contaminants. We took 9 samples to test for the presence of coliform bacteria in March 2014. Five of these samples showed the presence of total coliform bacteria. The standard is that no more than one sample per month may show the presence of coliform bacteria.

What should I do?

- **You do not need to boil your water or take other corrective actions.**
- This is not an emergency. If it had been, you would have been notified immediately. Total coliform bacteria are generally not harmful themselves. *Coliforms are bacteria which are naturally present in the environment and are used as an indicator that other, potentially-harmful, bacteria may be present. Coliforms were found in more samples than allowed and this was a warning of potential problems.*
- Usually, coliforms are a sign that there could be a problem with the treatment or distribution system (pipes). Whenever we detect coliform bacteria in any sample, we do follow-up testing to see if other bacteria of greater concern, such as fecal coliform or *E. coli*, are present. **We did not find any of these bacteria in our subsequent testing.**
- People with severely compromised immune systems, infants, and some elderly may be at increased risk. These people should seek advice about drinking water from their health care providers. General guidelines on ways to lessen the risk of infection by microbes are available from EPA's Safe Drinking Water Hotline at 1(800) 426-4791.
- 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]. _____
_____.

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 Double L Mobile Ranch Park

Date distributed: _____.