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STATE OF CALIFORNIA
WATER RESOURCES CONTROL BOARD
DIVISION OF DRINKING WATER

TO: Alta Elementary School
c/o Kings Canyon Unified School District
675 W. Manning
Reedley, CA 93654

Water System No. 1000180

Attn: Joseph Gonzales

**CITATION FOR VIOLATION OF CALIFORNIA CODE OF REGULATIONS, TITLE 22,
SECTION 64426.1 (b) (2) - TOTAL COLIFORM MAXIMUM CONTAMINANT LEVEL**

August and September 2014

CITATION NO. 03-23-14C-069

Issued on November 14, 2014

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

The State Water Resources Control Board, acting by and through its Division of Drinking Water (hereinafter "Division") and the Deputy Director for the Division (hereinafter "Deputy Director"), hereby issues a citation to the Alta Elementary School Water System (hereinafter, Water System) (mailing address: 675 W. Manning, Reedley, CA 93654) for

31 violation of California Code of Regulations (CCR), Title 22, Section 64426.1 subsections
32 (b)(2).

33 **APPLICABLE AUTHORITIES**

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

35 (a) If the department determines that a public water system is in violation of this chapter or
36 any regulation, permit, standard, citation, or order issued or adopted thereunder, the
37 department may issue a citation to the public water system. The citation shall be served
38 upon the public water system personally or by certified mail. Service shall be deemed
39 effective as of the date of personal service or the date of receipt of the certified mail. If a
40 person to whom a citation is directed refuses to accept delivery of the certified mail, the
41 date of service shall be deemed to be the date of mailing.

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

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

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

48 (e) The department may assess a penalty in an amount not to exceed one thousand
49 dollars (\$1,000) per day for each day that a violation occurred, and for each day that a
50 violation continues to occur. A separate penalty may be assessed for each violation.

51 **California Code of Regulations, Title 22, Section 64426.1, subsections (a) and (b)**
52 **provide, in relevant part:**

53 **§64426.1. Total Coliform Maximum Contaminant Level (MCL).**

54 (a) Results of all samples collected in a calendar month pursuant to Sections 64423,
55 64424, and 64425 that are not invalidated by the Department or the laboratory shall be
56 included in determining compliance with the total coliform MCL. Special purpose
57 samples such as those listed in §64421(b) and samples collected by the water
58 supplier during special investigations shall not be used to determine compliance with
59 the total coliform MCL.

60 (b) A public water system is in violation of the total coliform MCL when any of the
61 following occurs:

62 (1) For a public water system which collects at least 40 samples per month, more
63 than 5.0 percent of the samples collected during any month are total coliform-
64 positive; or

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

67 **STATEMENT OF FACTS**

68 The Water System is operated under Water Supply Permit No. 03-23-10P-013, issued
69 by the Division on December 16, 2010. Alta Elementary School Water System is a non-
70 transient non-community water system serving a population of five hundred (500) people
71 through (1) service connection.

72
73 The Water System is required to collect a minimum of one (1) distribution system
74 bacteriological sample per month. The bacteriological water analysis results submitted by
75 the Water System reported the presence of total coliform bacteria in four (4) of eleven (11)
76 samples collected during August 2014 and in two (2) of (14) samples collected during
77 September 2014. None of the positive samples showed the presence of fecal coliform or
78 *E. coli* bacteria.

79
80 The following table summarizes the bacteriological monitoring conducted during the
81 months of August, September and October of 2014.

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Collection Date	Number of Samples	Sample Labeled	Number TC positive	Number E. Coli positive
8/5/2014	1	Routine	1	0
8/7/2014	5	Repeat (including Well)	3 (all distribution)	0
8/11/2014	5	Repeat (including Well)	0	0
9/2/2014	5	Routine (including Well)	1 (well)	0
9/4/2014	3	Repeat (all distribution)	1	0
9/8/2014	6	Repeat (including Well)	0	0
10/7/2014	5	Routine (all distribution)	0	0

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84 Due to the above-mentioned total coliform positive samples, the Water System failed the
85 total coliform MCL for the months of August and September of 2014. Results for water
86 samples tested for coliform bacteria during 2014 are summarized in Attachment A. Water
87 System staff have completed a Positive Total Coliform Investigation (Attachment B)
88 indicating that the cause of the coliform contamination was unknown. SWRCB staff visited
89 the site on September 8, 2014. The water system's well and distribution had been
90 disinfected on September 3, 2014 per AWWA standards, and it was surmised that
91 loosening of a biofilm may have contributed to the continuing positive coliform results.
92 During the SWRCB staff's visit, repeat sampling was again conducted to determine
93 whether the contamination persisted. The five routine distribution samples required the
94 month following September 2014, which had two total coliform-positive samples, were
95 collected on October 7, 2014 and were negative for total coliform bacteria.

96
97 The Groundwater Rule adopted by the Department, effective August 18, 2011, requires
98 the collection of a sample for bacteriological evaluation from wells serving the system in
99 response to a coliform positive distribution sample. This requirement was met with each
100 round of repeat sampling.

101 VIOLATION

102 The Drinking Water Field Operations Branch of the State Water Resources Control Board
103 – Division of Drinking Water (hereinafter 'Division') hereby issues a Citation to Alta
104 Elementary School Water System (hereinafter 'Water System'), for failure to comply with
105 Section 116555(a)(1) of the CHSC and Section 64426.1(b)(2) of Title 22, California Code
106 of Regulations (CCR). Based on the Statement of Facts, the Water System has failed to
107 comply with the total coliform Maximum Contaminant Level (MCL) for the months of
108 August and September 2014.

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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) the total coliform MCL 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 August 8, 2014 and on September 3, 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 non-transient non-community water systems to give public notice by posting the notice in conspicuous locations throughout the area served by the water system and by the use of one or more of the following methods in order to reach persons not likely to be reached by a public posting: publication in a local newspaper or newsletter distributed to customers, e-mailing the public notice to water system customers, post the public notice on the internet, or by delivery to each customer. The Water System shall post the public notice provided as Attachment C in conspicuous locations within the water system and shall deliver the public notice directly to each student and employee.

Section 116450(g) requires that upon receipt of notification from a public water system, schools must notify school employees, students, and parents (if the students are minors), residential rental property owners or managers (including nursing homes and care

137 facilities) must notify their tenants and business property owners, managers or operators
138 must notify employees of businesses located on the property.

139 Notification of the public regarding the August violation was conducted on September 2,
140 2014 using Attachment C. Water System staff indicate that it was posted and hand
141 delivered to all employees. Proof of notification was provided to the Division using
142 Attachment D.

143 DIRECTIVES

144 The Alta Elementary School has completed the necessary public notification and
145 investigation and no other directives are necessary at this time.

146 PARTIES BOUND

147
148 This Citation shall apply to and be binding upon Alta Elementary School Water System, its
149 officers, directors, shareholders, agents, employees, contractors, successors, and
150 assignees.

151 SEVERABILITY

152 The Directives of this Citation are severable, and Alta Elementary School Water System
153 shall comply with each and every provision thereof, notwithstanding the effectiveness of
154 any other provision.

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FURTHER ENFORCEMENT ACTION

The California SDWA authorizes the Division to: issue citation with assessment of administrative penalties to a public water system for violation or continued violation of the requirements of the California SDWA or any permit, regulation, permit or order issued or adopted thereunder including, but not limited to, failure to correct a violation identified in a citation or compliance order. The California SDWA also authorizes the Division to take action to suspend or revoke a permit that has been issued to a public water system if the system has violated applicable law or regulations or has failed to comply with an order of the Division; and to petition the superior court to take various enforcement measures against a public water system that has failed to comply with violates an order of the Division. The Division does not waive any further enforcement action by issuance of this citation.

11/14/14

Date

Betsy Lichti

Betsy S. Lichti, P.E.,
District Engineer
Division of Drinking Water
State Water Resources Control Board



Attachments:

- A. Bacteriological Distribution Report
- B. Positive Total Coliform Investigation Form
- C. Completed Public Notice for August 2014
- D. Proof of Notification for August 2014

Bacteriological Distribution Monitoring Report

1000180 Alta School
Distribution System Freq: 1/M

Sample Date	Time	Location	T Coli	E Coli	F Coli	Type	Cl2	Violation	Comment
1/7/2014	8:02	Room 5	A	A		Routine			
2/4/2014	8:09	Room 5	A	A		Routine			
3/4/2014	10:00	rm 5	A	A		Routine			
4/1/2014	8:58	Alta Room 17	A	A		Routine			
5/6/2014	8:29	room 5	A	A		Routine			
6/3/2014	9:30	Alta Room 17	A	A		Routine			
7/1/2014	8:06	Room 5	A	A		Routine			
8/5/2014	8:14	Room 17	P	A		Routine			
8/7/2014	9:45	Room 17	P	A		Repeat			
8/7/2014	10:08	Well	A	A		Source Repeat			
8/7/2014	10:13	Room K2	P	A		Repeat		MCL	
8/7/2014	10:19	Room 5	A	A		Repeat			
8/7/2014	10:26	Room 1	P	A		Repeat			
8/11/2014	8:10	Room 17	A	A		Repeat			
8/11/2014	8:16	Well	A	A		Source Repeat			
8/11/2014	8:23	Room 5	A	A		Repeat			
8/11/2014	8:29	Room 1	A	A		Repeat			
8/11/2014	8:36	Room K2	A	A		Repeat			
9/2/2014	8:00	RM 17	A	A		Routine			
9/2/2014	8:08	Rm 14	A	A		Routine			
9/2/2014	8:12	Alta Zone 1 (Well)	P	A		Source Routine			
9/2/2014	8:20	Rm 5	A	A		Routine			
9/2/2014	8:25	K2	A	A		Routine			
9/4/2014	7:50	Rm 14	P	A		Repeat		MCL	
9/4/2014	7:57	Rm 17	A	A		Repeat			
9/4/2014	8:17	Rm 5	A	A		Repeat			
9/8/2014	8:04	K2	A	A		Repeat			
9/8/2014	9:15	Alta Room 17	A	A		Repeat			
9/8/2014	9:20	Room 14	A	A		Repeat			
9/8/2014	9:30	K2	A	A		Repeat			
9/8/2014	9:40	Room 5	A	A		Repeat			
9/8/2014	9:45	Zone 1 (Well)	A	A		Source Repeat			
10/7/2014	7:50	Alta Zone 1	A	A		Routine			
10/7/2014	8:00	Alta Rm 17	A	A		Routine			
10/7/2014	8:06	Alta Rm 14	A	A		Routine			
10/7/2014	8:12	Alta Rm 5	A	A		Routine			
10/7/2014	8:20	Alta Rm K2	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

POSITIVE TOTAL COLIFORM INVESTIGATION
Simple Well with Pressure Tank Systems

This form is intended to assist public water systems in completing the investigation required by the SWRCB Drinking Water Division (Section 64426(b) of Title 22, California Code of Regulations) and may be modified to take into account conditions unique to the system.

ADMINISTRATIVE INFORMATION

PWS Name:	Alta School		PWS ID NUMBER:	1000180
Operator in Responsible Charge (ORC)	Name	Address	Telephone #	
Person that collected TC samples if different than ORC	Byron Taira	1500 I St. Reedley CA 93654	351-6089	
Owner	Soel Stevens	1500 I St. Reedley CA 93654	351-3970	
Certified Laboratory for Microbiological Analyses	Kings Canyon Unified School District	675 W. Manning Reedley 93654	305-7010	
Date Investigation Completed:	9-03-14	1414 Stanislaus Passoa CA 93706	497-2888	
Month(s) of Total Coliform MCL Failure:	1			

INVESTIGATION DETAILS

SOURCE	WELL (name)	WELL (name)	WELL (name)	WELL (name)	COMMENTS
	(name)	(name)	(name)	(name)	
1. Inspect each well head for physical defects and report	Zone 1				
a. Is raw water sample tap upstream from point of disinfection?	N/A				No Disinfection
b. Is wellhead vent pipe screened?	Yes				
c. Is wellhead seal watertight?	Yes				
d. Is well head located in pit or is any piping from the wellhead submerged?	No				
e. Does the ground surface slope towards well head?	No				
f. Is there evidence of standing water near the wellhead?	No				
g. Is there a check valve on the well discharge line? Is the check valve seating properly?	Yes				
h. Are there any connections to the raw water piping that could be cross connections? (describe all connections in comments)	No				
i. Is the wellhead secured to prevent unauthorized access?	Yes				
j. To what treatment plant (name) does this well pump?	N/A				
k. How often do you take a raw water total coliform (TC) test?	Monthly				monthly from Routine sample point. Only as Repeat sample from well
l. Provide the date and result of the last TC test at this location	11-7-13	absent			

POSITIVE TOTAL COLIFORM INVESTIGATION

Attachment B

Page 2 of 3

DISTRIBUTION SYSTEM	SYSTEM RESPONSES
1. What is the minimum pressure you are maintaining in the distribution system?	50 PSI
2. Did pressure in the distribution system drop to less than 5 psi prior to experiencing the TCR positive finding?	NO
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.	NO
4. Are there any signs of excavations near your distribution system not under the direct control of your maintenance staff?	NO
5. Did you inspect your distribution system to check for mainline leaks? Do you or did you have a mainline leak?	NO
6. If there was a mainline leak, when was it repaired?	N/A
7. On what date was the distribution system last flushed?	N/A
8. Is there a written flushing procedure you can provide for our review?	NO
9. Do you have an active cross connection control program?	YES
10. What is name and phone number of your Cross-Connection Control Program Coordinator?	Joseph Gonzalez 217-0373
11. Is the review and testing of backflow prevention devices current?	YES
12. On what date was the last physical survey of the system done to identify cross-connections?	5-10-2013

SAMPLE SITE EVALUATION (Complete for all TC+ or EC+ findings)	Routine Site TC+ or EC+ Results	Upstream Site	Downstream Site	Sample 4 Result (specify)
1. What is the height of the sample tap above grade? (inches)	45		22	Downstream
2. Is the sample tap located in an exterior location or is it protected by an enclosure?	ENC		30	40
3. Is the sample tap threaded, have a swing arm (kitchen sink) or aerator (sinks)?	aerator		ENC	ENC
4. Is the sample tap in good condition, free of leaks around the stem or packing?	YES		Threaded	Threaded
5. Can the sample tap be adjusted to the point where a good laminar flow can be achieved without excessive splash?	YES		YES	YES
6. Is the sample tap and area around the sample tap clean and dry (free of animal droppings, other contaminants or spray irrigation systems)	YES		YES	YES
7. Is the area around the sample tap free of excessive vegetation or other impediments to sample collection	YES		YES	YES
8. Describe how the tap was treated in preparation for sample collection (ran water, swabbed with disinfectant, flamed, etc.)	Flamed		Flamed	Flamed
9. Is this sample tap designated on the sampling plan submitted with this information request?	YES		YES	YES
10. What were weather conditions at the time of positive sample (rainy, windy, sunny)?	Sunny		Sunny	Sunny

POSITIVE TOTAL COLIFORM INVESTIGATION

GENERAL OPERATIONS:	Response
1. Where there any power outages that affected water system facilities during the 30 days prior to the TC+ or EC + findings?	NO
2. Where there any main breaks, water outages, or low pressure reported in the service area where TC+ or EC+ samples were located.	NO
3. Does the system have backup power or elevated storage?	NO
4. During or soon after bacteriological quality problems, did you receive any complaints of any customers' illness suspected of being waterborne? How many?	NO
5. What were the symptoms of illness if you received complaints about customers being sick?	N/A

ADDITIONAL INFORMATION TO BE SUBMITTED WITH RESPONSES TO THE ABOVE QUESTIONS

1. Sketch of System showing all sources, treatment 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.
2. A set of photographs of the well, 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 our Division.
3. Name, certification level and certificate number of the Operator in Responsible Charge.
4. Copy of the last cross connection survey performed that identifies the location of all unprotected cross connections.

SUMMARY: BASED ON THE RESULTS OF YOUR INVESTIGATION AND ANY OTHER INFORMATION AT YOUR DISPOSAL, WHAT DO YOU BELIEVE TO BE THE CAUSE OF THE POSITIVE TOTAL COLIFORM SAMPLES FROM YOUR PUBLIC WATER SYSTEM?

Unknown

CERTIFICATION: I CERTIFY THAT THE INFORMATION SUBMITTED IN RESPONSE TO THE QUESTIONS ABOVE IS ACCURATE TO THE BEST OF MY PROFESSIONAL KNOWLEDGE

NAME: Byron Tava TITLE: HVAC/Plumber DATE: 9-3-14

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.

Alta School's Water System Had 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 five (5) samples to test for the presence of coliform bacteria in August 2014. Four 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?

The water system was chlorinated and flushed. Repeat samples taken on 8-11-14 showed no bacteria to be present in the water.

For more information, please contact Joseph Gonzalez at (559) 305-7062
Or 1500 I St. Reedley, CA 93654

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.



EDMUND G. BROWN JR.
GOVERNOR



MATTHEW RODRIGUEZ
SECRETARY FOR
ENVIRONMENTAL PROTECTION

State Water Resources Control Board
Division of Drinking Water

A Attachment D

PROOF OF NOTIFICATION
(Return with copy of notice)

As required by Section 116450 of the California Health and Safety Code, I notified all users of water supplied by the **Alta School** of the failure to meet the **total coliform bacteria MCL** for the months of **August 2014** as directed by the Department.

Notification was made on 09-02-2014 by _____
(date)

hand delivered and/or mailed and/or posted written notice.
(circle all that apply)

Signature of Water System Representative

Joseph Gonzalez
Printed Name

9/2/14
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 submitted for the purpose of compliance with the attached order may be liable for a civil penalty not to exceed five thousand dollars (\$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: **September 15, 2014**
Total Coliform MCL Failure: **August 2014**
System Number: **1000180**
Citation No.: _____