



EDMUND G. BROWN JR.
GOVERNOR



MATTHEW RODRIGUEZ
SECRETARY FOR
ENVIRONMENTAL PROTECTION

State Water Resources Control Board

Division of Drinking Water

September 3, 2015
Certified Mail/Return
7012 3460 0003 1113 1908

Willows Mobile Home Community & RV Park
3511 Del Paso Road, Suite 160-240
Sacramento, CA 95835

Attention: Richard Travassos, Property Manager

RE: Willows Mobile Home Community & RV Park, Public Water System No. 1100237 – Compliance Order No. 21-15R-006 for Exceedance of the Hexavalent Chromium Contaminant Level.

Enclosed is a compliance order issued to Willows Mobile Home Community & RV Park (System). The order is being issued because the System failed to achieve the drinking water standard for hexavalent chromium between October 2014 and July 2015. Please read this order carefully. Public notification is required to inform consumers that the standard was not achieved.

Note that Section 116577 of the California Safe Drinking Water Act provides for the Division to be reimbursed by the public water system for costs incurred for preparing and issuing a compliance order. In accordance with Section 116577, the System will be billed for the preparation and issuance of this citation.

If you have any questions regarding this matter, please call Paul Rowe at (530) 224-4866 or me at (530) 224-4861.

Sincerely,

Handwritten signature of Reese B. Crenshaw in black ink.

Reese B. Crenshaw, P.E.
Valley District Engineer
Drinking Water Field Operations Branch

Enclosures

cc: Craig Poundstone, Operator
Glenn County Department of Environmental Health

FELICIA MARCUS, CHAIR | THOMAS HOWARD, EXECUTIVE DIRECTOR

364 Knollcrest Drive, Suite 101, Redding, CA 96002 | www.waterboards.ca.gov

1 **Compliance Order No. 21-15R-006**

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STATE OF CALIFORNIA

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WATER RESOURCES CONTROL BOARD

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DIVISION OF DRINKING WATER

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Public Water System: Willows Mobile Home Community & RV Park

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Water System No.: 1100237

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TO: Willows Mobile Home Community & RV Park

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Attn: Richard Travassos

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3511 Del Paso Road, Suite 160-240

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Sacramento, CA 95835

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Issued: September 3, 2015

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COMPLIANCE ORDER FOR

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VIOLATION OF HEALTH AND SAFETY CODE SECTION 116555 (a) (1)

20

AND THE PRIMARY DRINKING WATER STANDARD

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FOR HEXAVALENT CHROMIUM

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The State Water Resources Control Board (hereinafter "State Board"), acting by and

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through its Division of Drinking Water (hereinafter "Division") and the Deputy Director

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for the Division, hereby issues this Compliance Order (hereinafter "Order") pursuant to

26

Section 116655 of the California Health and Safety Code (hereinafter "CHSC") to

27

Willows Mobile Home Community & RV Park for violation of the CHSC Section

1 116555(a)(1) and Title 22, California Code of Regulations (hereinafter "CCR"),
2 Section 64431.

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5 **APPLICABLE AUTHORITIES**

6 **Section 116555(a) (1) of the CHSC states in relevant part:**

7
8 (a) Any person who owns a public water system shall ensure that the system does
9 all of the following:

- 10 (1) Complies with primary and secondary drinking water standards.

11 **Section 116655 of the CHSC states in relevant part:**

12
13 (a) Whenever the department determines that any person has violated or is
14 violating this chapter, or any permit, regulation, or standard issued or adopted
15 pursuant to this chapter, the director may issue an Order doing any of the following:

- 16 (1) Directing compliance forthwith.
17 (2) Directing compliance in accordance with a time schedule set by the
18 department.
19 (3) Directing that appropriate preventive action be taken in the case of a
20 threatened violation.

21 (b) An Order issued pursuant to this section may include, but shall not be limited
22 to, any or all of the following requirements:

- 23 (1) That the existing plant, works, or system be repaired, altered, or added to.
24 (2) That purification or treatment works be installed.
25 (3) That the source of the water supply be changed.

- 1 (4) That no additional service connection be made to the system.
- 2 (5) That the water supply, the plant, or the system be monitored.
- 3 (6) That a report on the condition and operation of the plant, works, system, or
- 4 water supply be submitted to the department.

5 **CCR, Title 22, Section 64431, states in relevant part:**

6
7 Public water systems shall comply with the primary MCLs in table 64431-A as
8 specified in this article.

9 **Table 64431-A**
10 **Maximum Contaminant Levels**
11 **Inorganic Chemicals**

<i>Chemical</i>	<i>Maximum Contaminant Level, mg/L</i>
Aluminum	1.
Antimony	0.006
Arsenic	0.010
Asbestos	7 MFL*
Barium	1.
Beryllium	0.004
Cadmium	0.005
Chromium	0.05
Cyanide	0.15
Fluoride	2.0
Hexavalent chromium	0.010
Mercury	0.002
Nickel	0.10
Nitrate (as nitrogen)	10.
Nitrate+Nitrite (sum as nitrogen)	10.
Nitrite (as nitrogen)	1.
Perchlorate	0.006
Selenium	0.05
Thallium	0.002

* MFL=million fibers per liter; MCL for fibers exceeding 10 um in length.

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1 **CCR Title 22, Section 64432, states in relevant part:**

2 (g) If the level of any inorganic chemical, except for nitrate, nitrite, nitrate plus
3 nitrite, or perchlorate, exceeds the MCL, the water supplier shall do one of the
4 following:

5 (1) Inform the State Board within 48 hours and monitor quarterly beginning in
6 the next quarter after the exceedance occurred; or

7 (2) Inform the State Board within seven days from the receipt of the analysis
8 and, as confirmation, collect one additional sample within 14 days from
9 receipt of the analysis. If the average of the two samples collected exceeds
10 the MCL, this information shall be reported to the Department within 48
11 hours and the water supplier shall monitor quarterly beginning in the next
12 quarter after the exceedance occurred.

13 (h) If the concentration of an inorganic chemical exceeds ten times the MCL, within
14 48 hours of receipt of the result the water supplier shall notify the State Board and
15 resample as confirmation. The water supplier shall notify the State Board of the
16 result(s) of the confirmation sample(s) within 24 hours of receipt of the confirmation
17 result(s).

18 (1) If the average concentration of the original and confirmation sample(s) is
19 less than or equal to ten times the MCL, the water supplier shall monitor
20 quarterly beginning in the quarter following the quarter in which the
21 exceedance occurred.



1 (2) If the average concentration of the original and confirmation sample(s)
2 exceeds ten times the MCL, the water supplier shall, if directed by the State
3 Board;

4 (A) Immediately discontinue use of the contaminated water source; and

5 (B) Not return the source to service without written approval from the
6 State Board.

7 (i) Compliance with the MCLs shall be determined by a running annual average; if
8 any one sample would cause the annual average to exceed the MCL, the system is
9 immediately in violation. If a system takes more than one sample in a quarter, the
10 average of all the results for that quarter shall be used when calculating the running
11 annual average. If a system fails to complete four consecutive quarters of monitoring,
12 the running annual average shall be based on an average of the available data.

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14 **STATEMENT OF FACTS**

15 The Willows Mobile Home Community & RV Park (hereinafter, "System") serves water
16 to approximately 150 individuals through 87 service connections. The System is
17 operated under Domestic Water Supply Permit No. 01-02-93P11004, issued on
18 December 31, 1993, and consists of two active wells. The System is a community
19 public water system as defined in the California Health and Safety Code, Section
20 116275.

21
22 Title 22, CCR, Division 4, Chapter 15, Article 4, establishes primary drinking water
23 standards and monitoring and reporting requirements for inorganic constituents.
24 Community water systems must comply with the maximum contaminant level for

1 hexavalent chromium of 0.010 milligrams per liter (mg/L) or 10 micrograms per liter
2 (ug/L), as established in Title 22 CCR Section 64431.

3
4 A sample collected in October 2014 showed a hexavalent chromium concentration
5 over the MCL in water produced by the System's Well 02 as noted in **Table 1** below.
6 Therefore, in accordance with Section 64432 (g), the System was required to begin
7 quarterly hexavalent chromium monitoring of the well. Section 64432 (i) provides that
8 compliance with the hexavalent chromium MCL is based on a "running annual
9 average" (RAA) of the quarterly monitoring samples, computed each quarter.
10 Furthermore, Section 64432 (i) states: "if any one sample would cause the annual
11 average to exceed the MCL, the system is immediately in violation." A summary of
12 the results of quarterly hexavalent chromium samples above the MCL is presented in
13 the table below.

14
15 **Table 1: Hexavalent Chromium Monitoring Results for Well 02 (in ug/L)**
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	4 th Qtr. 2014	1 st Qtr. 2015	2 nd Qtr. 2015	3 rd Qtr. 2015	RAA
Well 02	12.0	13.0	12.0	6.1	10.8

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20 **DETERMINATION**

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22 Based on the above Statement of Facts, the Division has determined that the System
23 has violated the California Health and Safety Code, Section 116555 and Section
24 64431 in that the RAA for water produced by Well 02 between the fourth quarter of

1 2014 and the third quarter of 2015 exceeded the hexavalent chromium MCL as shown
2 in **Table 1** above.

3
4 **DIRECTIVES**

5 The System is hereby directed to take the following actions:
6

- 7 1. On or before September 30, 2015 submit a written response to the Division
8 indicating agreement to comply with the directives of this Order and with the
9 Corrective Action Plan addressed herein.
- 10 2. Commencing on the date of service of this Order, provide quarterly public
11 notification in accordance with **Attachment No. 1**, of the System's failure to
12 meet the hexavalent chromium MCL during any calendar quarter that the four-
13 quarter running annual average exceeds the MCL. You must notify consumers
14 by Mail or direct delivery AND by one of the other methods noted in
15 **Attachment No. 2**.
- 16 3. Commencing on the date of service of this Order, submit proof of each public
17 notification conducted in compliance with **Directive No. 2**, within 10 days
18 following each such notification, using the form provided as **Attachment No. 2**.
- 19 4. Commencing on the date of service of this Order collect quarterly samples for
20 hexavalent chromium from the Well 02, as required by Section 64432(g), and
21 ensure that the analytical results are reported to the Division electronically by
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the analyzing laboratory no later than the 10th day following the month in which the analysis was completed.

5. Continue to collect quarterly samples for hexavalent chromium at Well 03 due to the extremely variable results observed thus far.

6. Prepare a Corrective Action Plan for Division review and approval, and prior to implementation, to identify improvements to the water system designed to correct the violation of the hexavalent chromium MCL and ensure that the System delivers water to consumers that meets primary drinking water standards. The plan shall include a time schedule for completion of each of the phases of the project such as design, construction, and startup, and a date as of which the System will be in compliance with the hexavalent chromium MCL.

7. On or before October 15, 2015, submit the Corrective Action Plan required under **Directive No. 5** above to the Division.

8. Perform the Division approved Corrective Action Plan and each and every element of said plan according to the time schedule set forth therein.

9. On or before October 15, 2015 and every three months thereafter, submit a Quarterly Progress Report to the Division in the form provided as **Attachment No. 3**, showing actions taken during the previous calendar three months to comply with the Corrective Action Plan.

1 10. Notify the Division in writing no later than five (5) days prior to the deadline for
2 performance of any **Directive** set forth herein if the System anticipates it will
3 not meet such deadlines.

4
5 All submittals required by this Order shall be addressed to:

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7 Reese B. Crenshaw, P. E.
8 Valley District Engineer
9 State Water Resources Control Board
10 Division of Drinking Water
11 364 Knollcrest Dr. Suite 101
12 Redding, CA 96002
13
14

15 As used in this Order, the date of issuance shall be the date of this Order; and the
16 date of service shall be the date of service of this Order, by certified mail, on the
17 System.

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19 The Division reserves the right to make such modifications to this Order and/or to
20 issue such further Order(s) as it may deem necessary to protect public health and
21 safety. Such modifications may be issued as amendments to this Order and shall be
22 deemed effective upon issuance.

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24 Nothing in this Order relieves the System of its obligation to meet the requirements of
25 the California SDWA, or any regulation, standard, permit or Order issued thereunder.
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PARTIES BOUND

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

SEVERABILITY

The Directives of this Order are severable, and the System shall comply with each and every provision hereof, notwithstanding the effectiveness of any other provision.

FURTHER ENFORCEMENT ACTION

The California SDWA authorizes the State Board to: issue an enforcement action 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 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 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 Board. The State Board does not waive any further enforcement action by issuance of this Order.

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Richard L. Hinrichs

9/3/2015

Richard L. Hinrichs, P.E., Chief
Northern California Section
State Water Resources Control Board
Division of Drinking Water

Date

Certified Mail No. 7012 3460 0003 1113 1908

Enclosures: Attachment No. 1: Public Notification Template w/ Instructions
Attachment No. 2: Proof of Public Notification Form
Attachment No. 3: Quarterly Progress Report



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.

**Willows Mobile Home Community & RV Park
Has Levels of Hexavalent Chromium at Well 02
Above the Drinking Water Standard**

Our water system recently violated a drinking water standard. Although this is not an emergency, as our customers, you have a right to know what you should do, what happened, and what we are doing to correct this situation.

We routinely monitor for the presence of drinking water contaminants. Water sample results over the most recent four quarters showed a running annual average hexavalent chromium level of 10.8 micrograms per liter (ug/L) at Well 02. This is above the maximum contaminant level (MCL) of 10 ug/L. Well 03 has had extremely variable hexavalent chromium results and will continue to be monitored closely.

What should I do?

- **You do not need to use an alternative water supply (e.g., bottled water).**
- This is not an emergency. If it had been, you would have been notified immediately. However, *some people who drink water containing hexavalent chromium in excess of the MCL over many years may have an increased risk of getting cancer.*
- If you have other health issues concerning the consumption of this water, you may wish to consult with your doctor.

What happened? What is being done?

We are working with the State Water Resources Control Board to evaluate the water supply and researching options to correct the problem. These options may include treating the water to remove hexavalent chromium or connecting to another water supply.

For more information, please contact Richard Travassos at 916-419-1972 or 3511 Del Paso Rd., Suite 160-240, Sacramento, CA 95835.

Please share this information with all the other people who drink this water, especially those who may not have received this notice directly.

This notice is being sent to you by Willows Mobile Home Community & RV Park

State Water System ID#: 1100237

Date distributed: _____.

CERTIFICATE OF PUBLIC NOTICE

This form when completed and returned to the State Water Resources Control Board – Division of Drinking Water (364 Knollcrest Drive, Suite 101, Redding, CA 96002 or fax to 530-224-4844), serves as certification that public notification to water users was completed as required by Title 22, California Code of Regulations, Sections 64463 – 64465.

Public Water System Name: Willows Mobile Home Community & RV Park

Public Water System No. 1100237

Public notification for the _____ quarter (1st, 2nd, 3rd, or 4th quarter) hexavalent chromium level MCL exceedance was performed by the following method(s) (check and complete those that apply):

_____ The notice was mailed or directly delivered to each consumer on _____ (date)

AND BY ONE OF THE FOLLOWING:

_____ The notice was posted in the following conspicuous places:

Provide the date (or dates) that the notice was posted on _____ (date)

_____ The notice was published in a local newspaper or newsletter on _____ (date)

**** Provide a copy of the public notice with this certificate**

I hereby certify that the above information is factual.

Printed Name

Signature

Date

Quarterly Progress Report

Water System: Willows Mobile Home Community & RV Park	Water System No.: 1100237
Compliance Order No. 21-15R-006	Violation: Hexavalent Chromium MCL Exceedance
Calendar Quarter:	Date Prepared:

This form should be prepared and signed by water system personnel with appropriate authority to implement the directives of the Compliance Order. Please attach additional sheets as necessary. The quarterly progress report must be submitted by the 10th day of each subsequent quarter, to the Division of Drinking Water, Valley District Office.

Summary of progress in the reporting quarter:

Anticipated compliance date : _____

Name

Signature

Title

Date