

State Water Resources Control Board

Division of Drinking Water

October 27, 2014
System No.: 1500511

Ms. Julia Deyarmond, Park Manager
VR's Trailer Park
2135 S. Union Avenue, Space #10
Bakersfield, CA 93307

RE: Citation No. 03-12-14C-036
Violation of Title 22, California Code of Regulations, Section 64426.1
For August and September 2014

Dear Ms. Deyarmond:

Enclosed is a Citation issued to VR's Trailer Park (Water System) public water system.

The Water System will be billed at the Division's hourly rate (currently estimated at \$126.00) for the time spent on issuing this Citation. The California Health and Safety Code Section 116577 provides that a public water system must reimburse the Division for actual costs incurred by the Division for specified enforcement actions, including but not limited to, preparing, issuing and monitoring compliance with a citation. At this time, the Division has spent approximately one and one half hours on enforcement activities associated with this violation.

The Water System will receive a bill sent from the Division of Drinking Water Fee Billing Unit in August of the next fiscal year. This bill will contain fees for any enforcement time spent on VR's Trailer Park for the current fiscal year.

If you have any questions regarding this letter and the enclosed citation, please contact the Visalia District office at (559) 447-3300.

Sincerely,



Tricia A. Wathen, P.E.
Senior Sanitary Engineer, Visalia District
SOUTHERN CALIFORNIA BRANCH
DRINKING WATER FIELD OPERATIONS

TAW/SF

Enclosures

cc: Kern County Environmental Health Department

STATE OF CALIFORNIA
WATER RESOURCES CONTROL BOARD
DIVISION OF DRINKING WATER

IN RE: **VR'S TRAILER PARK**
Water System No. 1500511

TO: Ms. Julia Deyarmond, Park Manager
VR's Trailer Park
2135 S. Union Avenue, Space #10
Bakersfield, CA 93307

CC: Kern County Environmental Health Services Department

**CITATION FOR VIOLATION OF
CALIFORNIA CODE OF REGULATIONS, TITLE 22, SECTION 64426.1, 64426.1(c), and
64424(a)
August and September 2014**

Issued on October 27, 2014

Section 116650 of the California Health and Safety Code authorizes the issuance of a citation to a public water system for violation of 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 (hereinafter "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 VR's Trailer Park (hereinafter "Water System") (2135 S. Union Avenue, Bakersfield, CA 93307) for violation of California Code of Regulations (CCR), Title 22, Section 64426.1, 64426.1(c), and 64424(a).

1 APPLICABLE AUTHORITIES

2 The applicable statutes and regulations are provided in Appendix A, attached hereto and
3 incorporated by reference.

4
5 STATEMENT OF FACTS

6 The Water System is a community water system serving a residential population of
7 approximately twenty five (25) persons through twenty seven (27) service connections. The
8 Water System is required to collect a minimum of one (1) distribution system bacteriological
9 sample per month. The bacteriological water analysis results submitted by the Water System
10 reported the presence of total coliform bacteria in three (3) of three (3) distribution system
11 samples collected in August 2014 and four (4) of nine (9) distribution system samples collected
12 in September 2014. None of the positive samples showed the presence of fecal coliform or *E.*
13 *coli* bacteria.

14
15 Due to a total coliform positive sample collected in July 2014, at the direction of the Division, the
16 Water System collected four (4) samples on August 27, 2014, three (3) distribution system
17 samples and one (1) well sample. All four (4) samples were positive for total coliform and
18 negative for *E. coli* bacteria. There were no repeat samples collected in response to the August
19 27 total coliform positive samples, and no disinfection was done.

20
21 On September 9, 2014, five (5) samples were collected, four (4) distribution system samples
22 and one (1) well sample. Results of the four (4) distribution system samples were positive for
23 total coliform and negative for *E. coli* bacteria. Results of the well sample were 6.9 MPN/100mL
24 for total coliform and <1.1 MPN/100mL for *E. coli* bacteria. Upon being notified of the results,
25 the Division directed the Water System to implement disinfection of the well and continuous
26 chlorination of the distribution system for a period of at least one week. All water samples for
27 coliform bacteria collected over the past year are summarized in Attachment A.

1 The Water System contracted with McMor Chlorination to disinfect the well and install and
2 maintain continuous chlorination of the distribution system for a period of thirty days.
3 Continuous chlorination was initiated around the middle of September, but after only several
4 days of chlorination, the Water System's well went dry. When the well went dry, the Water
5 System developed an emergency connection with a neighboring property (a wrecking yard
6 company) which receives water from CWS Bakersfield. The connection consists of an
7 aboveground hose, running from a hose bib at the wrecking yard to a hose bib at the trailer
8 park. The Division was first provided with this information on October 1, 2014. At present time,
9 the Water System is still relying on this emergency connection. Five (5) distribution system
10 samples were collected on September 29, 2014, all of which were absent for total coliform and
11 *E. coli* bacteria.

12
13 A combination of factors likely contributed to the cause of contamination. Work had been
14 performed on the well at the beginning of July, and although the well was disinfected afterwards,
15 improper disinfection could have contributed to the July and August total coliform positive
16 samples. In addition, the well went dry very shortly after samples were collected on September
17 9, 2014; therefore low water levels could have also contributed to the total coliform positive
18 sample results. The Water System does not provide continuous disinfection of the distribution
19 system.

20
21 Public notification to the Division and consumers of a water system is required whenever a
22 violation of the Total Coliform MCL occurs. Notification to the Division is required by the end of
23 the business day on which the violation has been determined. If the Division is closed,
24 notification shall be within 24 hours of the determination. The Division was not notified of the
25 August 2014 TCR MCL until September 9, 2014. The Division was notified of the September
26 TCR MCL in accordance with the above-referenced section.

27

1 If public notification to the consumers of the water systems has not been conducted, the Water
2 System should use the public notice provided in Attachment B to notify its customers. This
3 notice fulfills the total coliform MCL notification requirements and includes the mandatory
4 language. Proof of notification is required.

5 6 DETERMINATION

7 Title 22, CCR, Section 64426.1, Total Coliform Maximum Contaminant Level (MCL) provides
8 that a public water system that collects fewer than 40 bacteriological samples per month has
9 violated the regulation if more than one (1) sample collected during any month is total coliform-
10 positive.

11
12 The Division has determined that the Water System failed to comply with Title 22, CCR, Section
13 64426.1, Total Coliform MCL for the months of August and September 2014 due to the
14 presence of total coliform bacteria in three (3) of three (3) distribution system samples collected
15 in August 2014 and four (4) of nine (9) distribution system samples collected in September
16 2014.

17 18 ASSOCIATED VIOLATIONS

19 The Division has also determined that the Water System failed to comply with Title 22, CCR,
20 Section 64426.1(c) which requires a public water system to notify the Division and the
21 consumers of the water system, when a violation of the total coliform MCL occurs. Notification
22 to the Division is required by the end of the business day on which the violation has been
23 determined. If the Division is closed, notification shall be within 24 hours of the determination.

24
25 Additionally, the Division has determined that during the month of August 2014, the Water
26 System failed to comply with Title 22, CCR, Section 64424(a) which specifies that for a water
27

1 supplier that normally collects one or fewer samples per month, a repeat sample set shall be at
2 least four samples for each total coliform-positive sample.

3
4 **DIRECTIVES**

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

- 6
7 1. Comply with Title 22, CCR, Section 64426.1, in all future monitoring periods.
- 8
9 2. On or before **November 15, 2014**, notify all persons served by the Water System of the
10 TCR MCL violation by utilizing the Tier 2 Public Notice for violations of Section 64426.1.
11 Public notice shall be given pursuant to Sections 64463.4 [lists method, time-frame and
12 delivery] and 64465 [content & format]. The Water System shall use the public notification
13 template appended as Attachment B to fulfill the public notification requirements. Section
14 64463.4 allows community water systems to use mail or direct delivery to each customer
15 and the use of one or more of the following methods: publication in a daily or weekly
16 newspaper, posting the public notice in a conspicuous public place within the water system
17 or on the internet, or by delivery to community organizations
- 18
19 3. On or before **November 15, 2014**, the Water System shall provide to the Division
20 certification of public notification using the enclosed Proof of Notification form (Attachment
21 C). A copy of the final notice that was distributed shall also be submitted to the Division with
22 the proof of notification form.
- 23
24 4. The Water System shall collect repeat samples as required by Section 64424 and as
25 discussed in this Citation whenever a routine sample is positive for total coliform bacteria.
26
27

1 5. The Water System shall collect five (5) routine samples for total coliform analysis during the
2 month of October 2014.

3
4 6. The Water System shall notify the Division of any further violations of the total coliform MCL
5 by the end of the business day on which the violation has been determined, or, if the
6 Division is closed, within 24 hours of the determination.

7
8 7. By **November 15, 2014**, the Water System shall complete and submit the enclosed "Positive
9 Total Coliform Investigation" form to the Division that describes the incident and all
10 corrective actions taken, and the results of the investigation. The appropriate investigation
11 report is provided as Attachment D.

12
13 The Division reserves the right to make such modifications to the Citation as it may deem
14 necessary to protect public health and safety. Such modifications may be issued as
15 amendments to this Citation and shall be effective upon issuance.

16
17 Nothing in this Citation relieves the Water System of its obligation to meet the requirements of
18 the California Safe Drinking Water Act or any regulation, standard, permit or order issued
19 thereunder.

20
21 All submittal required by this Citation shall be submitted to the Division at the following address:

22
23 Tricia A. Wathen, P.E.
24 Senior Sanitary Engineer
25 State Water Resources Control Board
26 Division of Drinking Water
27 265 W. Bullard Avenue, Suite 101
Fresno, CA 93704

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PARTIES BOUND

This Citation shall apply to and be binding upon VR's Trailer Park, its officers, directors, agents, employees, contractors, successors, and assignees.

SEVERABILITY

The Directives of this Citation are severable, and the Water System shall comply with each and every provision thereof notwithstanding the effectiveness of any provision.

1 FURTHER ENFORCEMENT ACTION

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

12
13
14 October 27, 2014
15 Date

Tricia A. Wathen
Tricia A. Wathen, P.E.
Senior Sanitary Engineer, Visalia District
DRINKING WATER FIELD OPERATIONS BRANCH

- 17
18 **TW/SF**
19 **Attachments:**
Attachment A: Summary of bacteriological samples collected over the past year
Attachment B: Public Notice
Attachment C: Proof of Notification Form
Attachment D: Positive Total Coliform Investigation report



APPENDIX A

Applicable Statutes and Regulations for Citation No. 03-12-14C-036

Section 116650 of the CHSC states in relevant part:

§116650. Citations

- (a) If the Division 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 Division 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 Division 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.

Section 64424 of Title 22, California Code of Regulations (CCR) states in relevant part:

§64424. Repeat Sampling.

- (a) If a routine sample is total coliform-positive, the water supplier shall collect a repeat sample set as described in paragraph (a)(1) within 24 hours of being notified of the positive result. The repeat samples shall all be collected within the same 24 hour time period. A single service connection system may request that the Division allow the collection of the repeat sample set over a four-day period.
 - (1) For a water supplier that normally collects more than one routine sample a month, a repeat sample set shall be at least three samples for each total coliform-positive sample. For a water supplier that normally collects one or fewer samples per month, a repeat sample set shall be at least four samples for each total coliform-positive sample.
 - (2) If the water supplier is unable to collect the samples within the 24-hour time period specified in subsection (a) or deliver the samples to the laboratory within 24 hours after collection because of circumstances beyond its control, the water supplier shall notify the Department within 24 hours. The Department will then determine how much time the supplier will have to collect the repeat samples.
- (b) When collecting the repeat sample set, the water supplier shall collect at least one repeat sample from the sampling tap where the original total coliform-positive sample was taken. Other repeat samples shall be collected within five service connections upstream or downstream of the original site. At least one sample shall be from upstream and one from downstream unless there is no upstream and/or downstream service connection.
- (c) If one or more samples in the repeat sample set is total coliform-positive, the water supplier shall collect and have analyzed an additional set of repeat samples as

specified in subsections (a) and (b). The supplier shall repeat this process until either no coliforms are detected in one complete repeat sample set or the supplier determines that the MCL for total coliforms specified in §64426.1 has been exceeded and notifies the Department.

- (d) If a public water system for which fewer than five routine samples/month are collected has one or more total coliform-positive samples, the water supplier shall collect at least five routine samples the following month. If the supplier stops supplying water during the month after the total coliform-positive(s), at least five samples shall be collected during the first month the system resumes operation. A water supplier may request the Department waive the requirement to collect at least five routine samples the following month, but a waiver will not be granted solely on the basis that all repeat samples are total coliform-negative. To request a waiver, one of the following conditions shall be met:
- (1) The Department conducts a site visit before the end of the next month the system provides water to the public to determine whether additional monitoring and/or corrective action is necessary to protect public health.
 - (2) The Department determines why the sample was total coliform-positive and establishes that the system has corrected the problem or will correct the problem before the end of the next month the system serves water to the public. If a waiver is granted, a system shall collect at least one routine sample before the end of the next month it serves water to the public and use it to determine compliance with §64426.1.

Section 64426.1 of Title 22, California Code of Regulations (CCR) states in relevant part:
§64426.1. Total Coliform Maximum Contaminant Level (MCL).

- (a) Results of all samples collected in a calendar month pursuant to Sections 64423, 64424, and 64425 that are not invalidated by the Department or the laboratory shall be included in determining compliance with the total coliform MCL. Special purpose samples such as those listed in §64421(b) and samples collected by the water supplier during special investigations shall not be used to determine compliance with the total coliform MCL.
- (b) A public water system is in violation of the total coliform MCL when any of the following occurs:
- (1) For a public water system which collects at least 40 samples per month, more than 5.0 percent of the samples collected during any month are total coliform-positive; or
 - (2) For a public water system which collects fewer than 40 samples per month, more than one sample collected during any month is total coliform-positive; or
 - (3) Any repeat sample is fecal coliform-positive or E. coli-positive; or
 - (4) Any repeat sample following a fecal coliform-positive or E. coli-positive routine sample is total coliform-positive.
- (c) If a public water system is not in compliance with paragraphs (b)(1) through (4), during any month in which it supplies water to the public, the water supplier shall notify the Department by the end of the business day on which this is determined, unless the determination occurs after the Department office is closed, in which case the supplier shall notify the Department within 24 hours of the determination. The water supplier shall also notify the consumers served by the water system. A Tier 2 Public Notice shall be given for violations of paragraphs (b)(1) or (2), pursuant to section 64463.4. A Tier 1 Public Notice shall be given for violations of paragraphs (b)(3) or (4), pursuant to section 64463.1.

Section 64463.4 of Title 22, California Code of Regulations (CCR) states in relevant part:
§64463.4. Tier 2 Public Notice.

- (a) A water system shall give public notice pursuant to this section if any of the following occurs:
- (1) Any violation of the MCL, MRDL, and treatment technique requirements, except:
 - (A) Where a Tier 1 public notice is required under section 64463.1; or
 - (B) Where the Department determines that a Tier 1 public notice is required, based on potential health impacts and persistence of the violations;
 - (2) All violations of the monitoring and testing procedure requirements in sections 64421 through 64426.1, article 3 (Primary Standards – Bacteriological Quality), for which the Department determines that a Tier 2 rather than a Tier 3 public notice is required, based on potential health impacts and persistence of the violations;

.....

- (b) A water system shall give the notice as soon as possible within 30 days after it learns of a violation or occurrence specified in subsection (a), except that the water system may request an extension of up to 60 days for providing the notice. This extension would be subject to the Department's written approval based on the violation or occurrence having been resolved and the Department's determination that public health and welfare would in no way be adversely affected. In addition, the water system shall:
- (1) Maintain posted notices in place for as long as the violation or occurrence continues, but in no case less than seven days;
 - (2) Repeat the notice every three months as long as the violation or occurrence continues. Subject to the Department's written approval based on its determination that public health would in no way be adversely affected, the water system may be allowed to notice less frequently but in no case less than once per year. No allowance for reduced frequency of notice shall be given in the case of a total coliform MCL violation or violation of a Chapter 17 treatment technique requirement; and

.....

- (c) A water system shall deliver the notice, in a manner designed to reach persons served, within the required time period as follows:
- (1) Unless otherwise directed by the Department in writing based on its assessment of the violation or occurrence and the potential for adverse effects on public health and welfare, community water systems shall give public notice by:
 - (A) Mail or direct delivery to each customer receiving a bill including those that provide their drinking water to others (e.g., schools or school systems, apartment building owners, or large private employers), and other service connections to which water is delivered by the water system; and
 - (B) Use of one or more of the following methods to reach persons not likely to be reached by a mailing or direct delivery (renters, university students, nursing home patients, prison inmates, etc.):
 1. Publication in a local newspaper;
 2. Posting in conspicuous public places served by the water system, or on the Internet; or
 3. Delivery to community organizations.
 - (2) Unless otherwise directed by the Department in writing based on its assessment of the violation or occurrence and the potential for adverse effects on public health and welfare, noncommunity water systems shall give the public notice by:

- (A) Posting in conspicuous locations throughout the area served by the water system; and
- (B) Using one or more of the following methods to reach persons not likely to be reached by a public posting:
 - 1. Publication in a local newspaper or newsletter distributed to customers;
 - 2. E-mail message to employees or students;
 - 3. Posting on the Internet or intranet; or
 - 4. Direct delivery to each customer.

Section 64465. of Title 22, California Code of Regulations (CCR) states in relevant part:
§64465. Public Notice Content and Format.

- (a) Each public notice given pursuant to this article, except Tier 3 public notices for variances and exemptions pursuant to subsection (b), shall contain the following:
 - (1) A description of the violation or occurrence, including the contaminant(s) of concern, and (as applicable) the contaminant level(s);
 - (2) The date(s) of the violation or occurrence;
 - (3) Any potential adverse health effects from the violation or occurrence, including the appropriate standard health effects language from appendices 64465-A through G;
 - (4) The population at risk, including subpopulations particularly vulnerable if exposed to the contaminant in drinking water;
 - (5) Whether alternative water supplies should be used;
 - (6) What actions consumers should take, including when they should seek medical help, if known;
 - (7) What the water system is doing to correct the violation or occurrence;
 - (8) When the water system expects to return to compliance or resolve the occurrence;
 - (9) The name, business address, and phone number of the water system owner, operator, or designee of the water system as a source of additional information concerning the public notice;
 - (10) A statement to encourage the public notice recipient to distribute the public notice to other persons served, using the following standard language: "Please share this information with all the other people who drink this water, especially those who may not have received this public 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"; and
 - (11) For a water system with a monitoring and testing procedure violation, this language shall be included: "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 your drinking water meets health standards. During [*compliance period dates*], we [*did not monitor or test*' or '*did not complete all monitoring or testing*'] for [*contaminant(s)*], and therefore, cannot be sure of the quality of your drinking water during that time."

.....

- (c) Each public notice given pursuant to this article shall contain information in Spanish regarding the importance of the notice, or contain a telephone number or address where Spanish-speaking residents may contact the water system to obtain a translated copy of the public notice or assistance in Spanish. For each non-English speaking group other than Spanish-speaking that exceeds 1,000 residents or 10% of the residents in the community served, whichever is less, the public notice shall:

- (1) Contain information in the appropriate language(s) regarding the importance of the notice, or
 - (2) Contain a telephone number or address where such residents may contact the water system to obtain a translated copy of the notice or assistance in the appropriate language.
- (d) Each public notice given pursuant to this article shall:
- (1) Be displayed such that it catches people's attention when printed or posted and be formatted in such a way that the message in the public notice can be understood at the eighth-grade level;
 - (2) Not contain technical language beyond an eighth-grade level or print smaller than 12 point; and
 - (3) Not contain language that minimizes or contradicts the information being given in the public notice.

Bacteriological Distribution Monitoring Report

1500511 V.R.S. Trailer Park
Distribution System Freq: 1/M

Sample Date	Location	T Coli	E Coli	F Coli	HPC	Type	CI2	CI2 Avg	Viol. Type	GWR Satisfied?	Comments
9/29/2014	Space #1	A	A			Routine					
9/29/2014	Space #22	A	A			Routine					
9/29/2014	Office	A	A			Routine					
9/29/2014	Space #7	A	A			Routine					
9/29/2014	Space #19	A	A			Routine					
9/9/2014	Space #7	P	A			Routine					
9/9/2014	Office	P	A			Routine					
9/9/2014	Space #1	P	A			Routine					
9/9/2014	Space #22	P	A			Routine			MCL		Cit. 03-12-14C-036
8/27/2014	Office	P	A			Routine	0		MCL		& MR5; Cit. 03-12-14C-036
8/27/2014	Space #1	P	A			Routine	0				
8/27/2014	Space #22	P	A			Routine	0				
7/31/2014	Office	P	A			Routine			MR5		Enf Ltr 03-12-14E-032
6/18/2014	Laundry	A	A			Routine					
5/30/2014	Office	A	A			Routine					
4/29/2014	Space #1	A	A			Routine					
3/31/2014	Space #24	A	A			Routine					
2/25/2014	Space #11	A	A			Routine					
1/29/2014	Space #24	A	A			Routine					
12/26/2013	Laundry Room	A	A			Routine					
11/25/2013	Office	A	A			Routine	0				
10/30/2013	Space 24	A	A			Routine					
9/30/2013	Laundry Rm	A	A			Routine					
8/29/2013	Men's Shower Rm	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	CI2 not reported

Source Bacteriological Monitoring Report

1500511 V.R.S. Trailer 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>
9/9/2014	12:56	Well	Well	MPN	6.9	<1.1				
8/27/2014	9:55	Well	Well	P/A	P	A				
7/31/2014	15:10	Well	Well	P/A	P	A				

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.

**V.R.S. Trailer 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. Total coliform bacteria was detected in 3 of 3 distribution system samples collected in August 2014 and 4 of 9 distribution system samples collected in September 2014. The standard is that no more than 1 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?

We anticipate resolving the problem within _____ [estimated time frame].

For more information, please contact _____
at (_____) _____ or at the following 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 V.R.S. Trailer Park.

Date distributed: _____.

PROOF OF NOTIFICATION
(Return with copy of the Notice)

As required by Section 116450 of the California Health and Safety Code, I notified all users of water supplied by the **V.R.S. Trailer Park** of the failure to meet the **total coliform bacteria MCL** for the months of **August and September 2014** as directed by the Division. At least one primary distribution method is required: mail, hand-delivery or newspaper publication. A second method is also required in order to reach persons not likely to be reached by a mailing, direct delivery or newspaper publication (renters, nursing home patients, prison inmates, etc.):

Notification was made on _____.
(date)

To summarize report delivery used and good-faith efforts used, please check all items below that apply and fill-in where appropriate:

- The notice was distributed by mail delivery to each customer served by the water system.
- The notice was distributed by direct delivery to each customer served by the water system. Specify direct delivery method(s) used: _____
- Publication of the notice in a local newspaper or newsletter of general circulation (attach a copy of the published notice, including name of newspaper and date published).
- Posted the notice at the following conspicuous locations served by the water system (if needed, please attach a list of locations). _____
- Posted the notice on the Internet at www._____
- Other method used to notify customers. _____

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.

Certified by Name and Title: _____

Date: _____ Signature: _____

Due to the Division of Drinking Water within 10 days of notification to the public
Total Coliform MCL Failure / Enforcement Action No.: 03-12-14C-036

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 Division of Drinking Water (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:		PWSID NUMBER:	
Operator in Responsible Charge (ORC)	Name	Address	Telephone #
Person that collected TC samples if different than ORC			
Owner			
Certified Laboratory for Microbiological Analyses			
Date Investigation Completed:			
Month(s) of Total Coliform MCL Failure:			

INVESTIGATION DETAILS

SOURCE	WELL (name)	WELL (name)	WELL (name)	WELL (name)	COMMENTS
1. Inspect each well head for physical defects and report					
a. Is raw water sample tap upstream from point of disinfection?					
b. Is wellhead vent pipe screened?					
c. Is wellhead seal watertight?					
d. Is well head located in pit or is any piping from the wellhead submerged?					
e. Does the ground surface slope towards well head?					
f. Is there evidence of standing water near the wellhead?					
g. Are there any connections to the raw water piping that could be cross connections? (describe all connections in comments)					
h. Is the wellhead secured to prevent unauthorized access?					
i. To what treatment plant (name) does this well pump?					
j. How often do you take a raw water total coliform (TC) test?					
k. Provide the date and result of the last TC test at this location					

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 TCR positive finding.

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DISTRIBUTION SYSTEM	SYSTEM RESPONSES
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.	
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. Is the review and testing of backflow prevention devices current?	
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	Sample 4 (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 sampling plan submitted with this information request?				
10. What were the weather conditions at the time of the positive sample (rainy, windy, sunny),				

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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?	
2. Where there any main breaks, water outages, or low pressure reported in the service area where TC+ or EC+ samples were located.	
3. Does the system have backup power or elevated storage?	
4. During or soon after bacteriological quality problems, did you receive any complaints of any customers' illness suspected of being waterborne? How many?	
5. What were the symptoms of illness if you received complaints about customers being sick?	

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 Department
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?

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

NAME: _____

TITLE: _____

DATE: _____