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GOVERNOR



MATTHEW RODRIGUEZ  
SECRETARY FOR  
ENVIRONMENTAL PROTECTION

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## State Water Resources Control Board

Division of Drinking Water

Water System No. 2300873

March 22, 2016

Don Asher, Owner  
Camp Navarro  
314 Halladay Street  
Seattle, WA 98109

### **CITATION NO. 02-03-16C-001 MONITORING AND REPORTING VIOLATION FOR TURBIDITY IN 2016**

Enclosed is a Citation issued to the Camp Navarro (System) public water system.

Your System will be billed at the State Water Resources Control Board Division of Drinking Water's (Division) hourly rate (currently estimated at \$160.00) for the time spent on issuing this Citation. 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.

If you have any questions regarding this matter, please contact Amy Little at (707) 576-2147 or me at (707) 576-2734.

Sincerely,

A handwritten signature in blue ink, appearing to read "Sheri K. Miller".

Sheri K. Miller, P.E., Mendocino District Engineer  
Division of Drinking Water  
STATE WATER RESOURCES CONTROL BOARD

Enclosures

c: Mendocino County Environmental Health  
Tyler Judson, Weeks Drilling, Inc.

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STATE OF CALIFORNIA  
WATER RESOURCES CONTROL BOARD  
DIVISION OF DRINKING WATER

**Name of Public Water System:** Camp Navarro

**Water System No:** 2300873

**To:** Camp Navarro Stewards, LLC.  
Don Asher  
314 Halladay Street  
Seattle, WA 98109

**Issued:** March 22, 2016

**CITATION FOR NONCOMPLIANCE**  
**TURBIDITY MONITORING AND REPORTING VIOLATION**  
**January and February 2016**

The Division of Drinking Water of the State of California Water Resources Control Board (Division) hereby issues a citation to the Camp Navarro public water system (System) for failure to comply with Condition 9(c) of Domestic Water Supply Permit No. 02-03-16P2300873.

Section 116650 of the California Health and Safety Code (CHSC), authorizes the issuance of a citation for failure to comply with a requirement of California Safe

1 Drinking Water Act (CHSC, Division 104, Part 12, Chapter 4, commencing with  
2 Section 116270), or any regulation, standard, permit or order issued thereunder.  
3 A copy of the *Applicable Statutes and Regulations* is located in Appendix 1, which  
4 is attached hereto and incorporated by reference.  
5  
6

7 **STATEMENT OF FACTS**

8 Camp Navarro is classified as a transient water system serving 19 connections  
9 with a population of 279. The System collected filtered effluent turbidity on a  
10 weekly basis in January and February 2016. Pursuant to Domestic Water Supply  
11 Permit No. 02-03-16P2300873 Condition 9(c), the System is required to monitor  
12 and report filtered effluent turbidity on a daily basis.  
13

14 **DETERMINATIONS**

15  
16 The System violated Condition 9(c) of Domestic Water Supply Permit 02-03-  
17 16P2300873. Condition 9(c) of Domestic Water Supply Permit 02-03-  
18 16P2300873 states, "The filter effluent turbidity shall be monitored daily. The  
19 turbidity level of the filtered water shall be equal to or less than 0.1 NTU in 95  
20 percent of the measurements taken each month and shall not exceed 1.0 NTU at  
21 any time. The Division shall be notified within 24 hours if the turbidity of the filter  
22 effluent exceeds 1.0 NTU."  
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1 During January and February 2016, the System failed to collect the required  
2 number of turbidity effluent samples. Therefore, the System violated the turbidity  
3 monitoring and reporting requirement contained in Condition 9(c) of Domestic  
4 Water Supply Permit No. 02-03-16P2300873.

### 5 6 7 **DIRECTIVES**

8 Camp Navarro is hereby directed to take the following actions:

- 9
- 10 1. Comply with Condition 9(c) of Domestic Water Supply Permit No. 02-03-  
11 16P2300873 in all future monitoring periods.
  - 12  
13 2. On or before **April 15, 2016**, notify all persons served by the System of the  
14 turbidity monitoring and reporting violation in conformance with Title 22, CCR,  
15 Sections 64463.4 and 64465. Appendix 2: Public Notification Template may  
16 be used to fulfill this directive.
  - 17  
18  
19 3. The System shall complete Appendix 3: Compliance Certification. Submit it  
20 together with a copy of the public notification to the Division on or before **April**  
21 **20, 2016**.
- 22  
23

24 The Division reserves the right to make such modifications to this Citation, as it  
25 may deem necessary to protect public health and safety. Such modifications may  
26 be issued as amendments to this Citation and shall be effective upon issuance.  
27

1 Nothing in this Citation relieves the System of its obligation to meet the  
2 requirements of the California Safe Drinking Water Act (CHSC, Division 104, Part  
3 12, Chapter 4, commencing with Section 116270), or any regulation, standard,  
4 permit or order issued thereunder.

5  
6 All submittals required by this Citation shall be submitted to the Division

7 at the following address: Sheri K. Miller, P.E.  
8 State Water Resources Control Board  
9 Division of Drinking Water  
10 50 D Street, Suite 200  
11 Santa Rosa, CA 95404

12 **PARTIES BOUND**

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

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17 **SEVERABILITY**

18 The directives of this Citation are severable, and the System shall comply with  
19 each provision thereof notwithstanding the effectiveness of any provision.

20  
21 **FURTHER ENFORCEMENT ACTION**

22 Division 104, Part 12, Chapter 4, (commencing with Section 116270) of the  
23 California Health and Safety Code authorizes the Division to: issue additional  
24 citations with assessment of penalties if the System continues to fail to correct a  
25 violation identified in a citation; take action to suspend or revoke a permit that has  
26 been issued to a public water system if the System has violated applicable law or  
27

1 regulations or has failed to comply with orders of the Division; and petition the  
2 superior court to take various enforcement measures against a public water  
3 system that has failed to comply with orders of the Division. The Division does  
4 not waive any further enforcement action by issuance of this citation.  
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Sheri K. Miller, P.E.  
Mendocino District Engineer  
Division of Drinking Water  
STATE WATER RESOURCES CONTROL BOARD

3-22-2016  
\_\_\_\_\_  
Date

Appendices (3):

1. Applicable Statutes and Regulations
2. Public Notification Template
3. Compliance Certification



Certified Mail No. 70141200000111677150

2300873/Compliance  
02-03-16C-001/AJL

**APPENDIX 1. APPLICABLE STATUTES AND REGULATIONS  
FOR CITATION NO. 02-03-16C-001**

Section 116650 of the CHSC states in relevant part:

- (a) If the State Board 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 State Board 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 State Board 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.

Condition 9(C) of Domestic Water Supply Permit No. 02-03-16P2300873 issued on January 12, 2016 states in relevant part:

The filter effluent turbidity shall be monitored daily. The turbidity level of the filtered water shall be equal to or less than 0.1 NTU in 95 percent of the measurements taken each month and shall not exceed 1.0 NTU at any time. The Division shall be notified within 24 hours if the turbidity of the filter effluent exceeds 1.0 NTU.

California Code of Regulations (CCR), Section 64463.4 states in relevant part:

- (c) A water system shall deliver the notice, in a manner designed to reach person served, within the required time period as follows:
  - (1) Unless otherwise directed by the State Board 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 State Board 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 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.

California Code of Regulations (CCR), Section 64465 states in relevant part:

(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) A public water system providing notice pursuant to this article shall comply with the following multilingual-related requirements:

- (1) For a Tier 1 public notice:
  - (A) The notice shall be provided in English, Spanish, and the language spoken by any non-English-speaking group exceeding 10 percent of the persons served by the public water system, and the notice shall include a telephone number or address where such individuals may contact the public water system for assistance; and
  - (B) If any non-English-speaking group exceeds 1,000 persons served by the public water system, but does not exceed 10 percent served, the notice shall include information in the appropriate language(s) regarding the importance of the notice, and the telephone number or address where such individuals may contact the public water system to obtain a translated copy of the notice from the public water system or assistance in the appropriate language;
- (2) For a Tier 2 or Tier 3 public notice:
  - (A) The notice 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 public water system to obtain a translated copy of the notice or assistance in Spanish; and
  - (B) When a non-English speaking group other than Spanish-speaking exceeds 1,000 residents or 10 percent of the residents served by the public water system, the notice shall include:
    1. Information in the appropriate language(s) regarding the importance of the notice; or
    2. A telephone number or address where such residents may contact the public water system to obtain a translated copy of the notice or assistance in the appropriate language; and

(3) For a public water system subject to the Dymally-Alatorre Bilingual Services Act, Chapter 17.5, Division 7, of the Government Code (commencing with section 7290), meeting the requirements of this Article may not ensure compliance with the Dymally-Alatorre Bilingual Services Act.

(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.

**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.

**Camp Navarro Failed to Monitor for Turbidity – January 2016**

Our water system failed to monitor for turbidity during January 2016 and, therefore, was in violation. Even though this failure 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 the situation.

We are required to monitor your drinking water for turbidity (cloudiness) on a daily basis. Results of regular monitoring are an indicator of whether or not our drinking water meets health standards. We monitored your drinking water for turbidity on a weekly basis during January 2016. Therefore, we cannot be certain of the quality of our drinking water during that time.

Please share this information with other people who drink this water, especially those who may not have received this notice directly. You can do this by posting this notice in a public place or giving out copies by hand or mail.

**What should I do?**

You do not need to boil the water or take any corrective actions. This is not an emergency. If you have health concerns, you may wish to consult your doctor. General guidelines on ways to lessen the risk of infection by microbes are available from EPA's Safe Drinking Water Hotline at (800) 426-4791.

**What corrective actions have been taken to prevent this violation from occurring in the future?**

We purchased the necessary equipment to ensure monitoring occurs on the required daily frequency.

This notification of the public is being done in compliance with Section 64463.4, Title 22 of the CCR as a means of keeping the public informed.

Persons wishing more information should contact:

Skip Bell, Facility Manager, (707) 895-3181

901 Masonite Industrial Road, Camp Navarro, CA 95461

**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.

**Monitoring Requirements Not Met for  
Camp Navarro**

Our water system failed to monitor as required for drinking water standards during the past year and, therefore, was in violation of the regulations. Even though this failure 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 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 our drinking water meets health standards. During January and February 2016, we partially monitored for turbidity and therefore, cannot be sure of the quality of our drinking water during that time.*

**What should I do?**

- There is nothing you need to do at this time.
- The table below lists the contaminant(s) we did not properly test for during the last year, how many samples we are required to take and how often, how many samples we took, when samples should have been taken, and the date on which follow-up samples were (or will be) taken.

<i>Contaminant</i>	<i>Required Sampling Frequency</i>	<i>Number of Samples Taken</i>	<i>When All Samples Should Have Been Taken</i>	<i>When Samples Were or Will Be Taken</i>
Turbidity	1 sample every day	8	Daily	March 2016

- If you have health issues concerning the consumption of this water, you may wish to consult your doctor.

**What happened? What is being done?**

A handheld turbidity unit will be purchased by [insert date] to facilitate regular monitoring of the treatment system.

For more information, please contact Skip Bell at (707) 895-3181 or 901 Masonite Industrial Road, Camp Navarro CA 95461.

APPENDIX 2

*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 Camp Navarro.

State Water System ID#: 2300873. Date distributed: \_\_\_\_\_.

**COMPLIANCE CERTIFICATION**

**Citation Number 02-03-16C-001**

Name of Water System: **CAMP NAVARRO**

System Number: **2300873**

**Certification**

As required by Section 116450 of the California Health and Safety Code, I certify that the users of the water supplied by this water system were notified of the violations of Title 22, California Code of Regulations (CCR) for the compliance period of January and February 2016. In addition, I certify that the Camp Navarro public water system complied with the directives of this citation as indicated below:

<u>Required Action</u>	<u>Date Completed</u>
Comply with Directive 1. Monitor turbidity daily	
Public Notification – Posting in conspicuous location	
Public Notification - Newspaper	

\_\_\_\_\_  
Signature of Water System Representative

\_\_\_\_\_  
Date

**Attach a copy of the notice posted to the customers and a copy of the notice published in the newspaper.**

**THIS FORM MUST BE COMPLETED AND RETURNED TO THE DEPARTMENT  
NO LATER THAN April 20, 2016**

**Disclosure:** Be advised that Section 116725 and 116730 of the California Health and Safety Code states 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 each 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 county jail not to exceed one year, or by both the fine and imprisonment.