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CALIFORNIA
STATE WATER RESOURCES CONTROL BOARD
DIVISION OF DRINKING WATER

TO: NAF El Centro
PWD Environmental Division
Code 83, Building 504
El Centro, CA 92243-5001

Attn: Bill Kagele, Environmental Protection Specialist

CITATION FOR VIOLATION OF
CALIFORNIA CODE OF REGULATIONS, Title 17, Sections 7584(e) & 7605(c)
by Water System No. 1310700

CITATION No. 05-14-15C-006

Issued on December 3, 2015

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 this citation (hereinafter "Citation") pursuant to Section 116650 of the California Health and Safety Code (hereinafter "CHSC") to the Naval Air Facility – El Centro (NAF) water system for violation of California Code of Regulations, Title 17, (hereinafter "CCR, Title 17") Sections 7584(e) and 7605(c).

APPLICABLE AUTHORITIES

CHSC, §116650 provides:

116650. Citations.
(a) If the department 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 department 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

1 *personal service or the date of receipt of the certified mail. If a person to*
2 *whom a citation is directed refuses to accept delivery of the certified mail, the*
3 *date of service shall be deemed to be the date of mailing.*

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

7 *(c) A citation may specify a date for elimination or correction of the condition*
8 *constituting the violation.*

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

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

15 **CCR, Title 17, §7584 provides:**

16 *The water supplier shall protect the public water supply from contamination by*
17 *implementation of a cross-connection control program. The program, or any*
18 *portion thereof, may be implemented directly by the water supplier or by*
19 *means of a contract with the local health agency, or with another agency*
20 *approved by the health agency. The water supplier's cross-connection control*
21 *program shall for the purpose of addressing the requirements of Sections*
22 *7585 through 7605 include, but not be limited to, the following elements:*

23 *(a) The adoption of operating rules or ordinances to implement the cross-*
24 *connection program.*

25 *(b) The conducting of surveys to identify water user premises where cross-*
26 *connections are likely to occur,*

27 *(c) The provisions of backflow protection by the water user at the user's*
28 *connection or within the user's premises or both,*

1 (d) *The provision of at least one person trained in cross-connection control*
2 *to carry out the cross-connection program,*

3 (e) *The establishment of a procedure or system for testing backflow*
4 *preventers, and*

5 (f) *The maintenance of records of locations, tests, and repairs of backflow*
6 *preventers.*

7
8 **CCR, Title 17, § 7605 provides:**

9 7605. *Testing and maintenance of backflow preventers*

10 (a) *The water supplier shall assure that adequate maintenance and periodic testing*
11 *are provided by the water user to ensure their proper operation.*

12 (b) *Backflow preventers shall be tested by persons who have demonstrated their*
13 *competency in testing of these devices to the water supplier or health agency.*

14 (c) *Backflow preventers shall be tested at least annually or more frequently if*
15 *determined to be necessary by the health agency or water supplier. When devices*
16 *are found to be defective, they shall be repaired or replaced in accordance with the*
17 *provisions of this Chapter.*

18 (d) *Backflow preventers shall be tested immediately after they are installed, relocated*
19 *or repaired and not placed in service unless they are functioning as required.*

20 (e) *The water supplier shall notify the water user when testing of backflow preventers*
21 *is needed. The notice shall contain the date when the test must be completed.*

22 (f) *Reports of testing and maintenance shall be maintained by the water supplier for a*
23 *minimum of three years.*

24

STATEMENT OF FACTS

1
2 Division is informed by NAF EI Centro and believes that the NAF EI Centro water system
3 (hereinafter "Water System") is a community water system located in Imperial County that
4 supplies water for domestic purposes to approximately 526 permanent individuals through
5 approximately 354 service connections. The Water System operates under Domestic
6 Water Supply Permit No. 05-14-02P-013, issued on January 17, 2003 and Permit
7 Amendment No. 05-14-07PA-064, issued on January 31, 2008. The Water System is a
8 community public water system as defined in CHSC, §116275; therefore, the Water
9 System must comply with CCR, Title 17.

10
11 The Water System's cross-connection control program is overseen by a cross-connection
12 control specialist certified by the California-Nevada Section of the American Water Works
13 Association. The Water System reports to the Division the number of backflow prevention
14 devices in the distribution system and number tested for each calendar year via the
15 electronic Annual Report (eAR).

16
17 The 2014 eAR submittal was provided to the Division on March 10, 2015 by the Water
18 System (Attachment 1). Per the 2014 eAR, the total number of backflow devices installed
19 in the distribution system was reported as 333, the number of devices installed was listed
20 as 47, the number of devices tested in 2014 was reported as 318, and the number of
21 devices failed was reported as 35. The 2014 eAR indicated that the number of backflow
22 devices in the distribution system and the number of devices tested were not in
23 agreement, and that 15 devices were not tested.

24
25 On July 10, 2015, the Division contacted the Water System via phone and email
26 (Attachment 2) to confirm that number of backflow devices in the distribution system and
27 the number of devices tested were not in agreement.

28
29 On July 13, 2015, the Water System contacted the Division via email (Attachment 2) to
30 confirm that the number backflow devices in the distribution system had increased by 15 in
31 2013, but NAF EI Centro failed to update the 2014 contract for third party testing of the

1 additional devices. This planning oversight resulted in the 15 new devices not being tested
2 in 2014.

3
4 **DETERMINATIONS**

5 Based on the above Statement of Facts, the Division has determined that the Water
6 System violated CCR, Title 17, §7584 (e) in that the Water System failed to maintain the
7 establishment of a procedure or system for testing backflow preventers, and violated CCR,
8 Title 17, §7605 (c) in that the Water System failed to test all backflow devices annually for
9 calendar year 2014.

10
11 **DIRECTIVES**

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

- 13
14 1. On or before December 31, 2015, comply with CCR, Title 17, §7584 and §7605 and
15 remain in compliance.
16 2. On or before December 31, 2015, provide the Division with copies of the 2015 backflow
17 device testing certification forms for the 15 devices not tested in 2014.
18

19
20 All submittals required by this Citation shall be addressed to:

21
22 Sean Sterchi, P.E.
23 San Diego District Engineer
24 State Water Resources Control Board
25 Division of Drinking Water
26 1350 Front Street, Room 2050
27 San Diego, CA 92101
28
29

30 As used in this Citation, the date of issuance shall be the date of this Citation; and the date
31 of service shall be the date of service of this Citation, personal or by certified mail, on the
32 Water System.
33

34 The Division reserves the right to make such modifications to this Citation and/or to issue
35 such further citations as it may deem necessary to protect public health and safety. Such

1 modifications may be issued as amendments to this Citation and shall be deemed effective
2 upon issuance.

3
4 Nothing in this Citation relieves Water System of its obligation to meet the requirements of
5 Chapter 4, Part 12, Division 104 of the CHSC (hereinafter "the California SDWA"), and any
6 regulation, permit, standard or order issued or adopted thereunder.

7
8 **PARTIES BOUND**

9 This Citation shall apply to and be binding upon the Water System, its owners,
10 shareholders, officers, directors, agents, employees, contractors, successors, and
11 assignees.

12
13 **SEVERABILITY**

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

16
17 **FURTHER ENFORCEMENT ACTION**

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

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12/3/15



Date

Sean Sterchi, P.E.
San Diego District Engineer
State Water Resources Control Board
Division of Drinking Water

CERTIFIED MAIL NO. 7014 2870 0000 8019 6546

ATTACHMENTS:

- 1) 2014 eAR excerpt, dated March 10, 2015
- 2) NAF EI Centro 2014 cross connection device testing email and response dated July 10 and 13, 2015, respectfully.

- cc) Jeff Lamoure, Deputy Director for Environmental Health Services, County of Imperial (via email)



WELCOME TO THE Electronic Annual Reporting System

Home ->> DE Home ->> EAR List ->> EAR Detail ->> EAR Detail Printable Version

LARGE WATER SYSTEM 2014 ANNUAL REPORT TO THE DRINKING WATER PROGRAM FOR YEAR ENDING DECEMBER 31, 2014 [Section 116530 Health & Safety Code]

WATER SYSTEM INFORMATION

Water System No.: CA1310700
 Water System Name: NAF EL CENTRO
 Water System Ownership: State or Federal Government
 Physical location: Valley Forge Avenue, Building 351
 (address line 1, address line 2, city, Naval Air Facility
 EL CENTRO 92243
 zip)
 Note: **NO** P.O. Box
 General Office Phone: (760) 339-2230
 (with area code)
 Web site address: <http://www.cnic.navy.mil/elcentro/>

Water System Ownership Descriptions:

- Local Government: e.g., city, county, or special district, local school district, junior colleges, county or community parks, etc.
- State or Federal Government: e.g., state or national park, BLM, USFS and COE campgrounds and recreation facilities, state hospitals, State universities and colleges, California Veterans Home, County or District Fairs and Expositions, Caltrans rest stop, military base, other state or federal facility
- Privately owned, non-PUC-regulated (Community Water System): e.g., mobile home park, apartment or condominium
- Privately owned business (non-community): e.g., church, private school, restaurant, amusement park, RV park/campground, motel, ranch/farm, factory, other business establishment

REPORT SUBMITTED BY:

Name: William Kagele
 Title: Water Program Manager
 Business phone: 760-339-2532
 Cell phone:
 Email address: william.kagele@navy.mil

COMMENTS:

1. PUBLIC WATER SYSTEM CONTACTS

Click here to learn how to Modify, Add and Delete Contacts in the table below.
IMPORTANT: Each water system must have one and only one Administrative Contact AND one and only one Financial Contact. The same person may be both the Administrative and Financial Contacts.

Please provide an email address for the Administrative Contact as most email communication, particularly email blasts, from the Division of Drinking Water will be sent to the email address of the Administrative Contact.

7. WATER QUALITY

ANNUAL NITRATE SAMPLING

Regulations require a minimum of annual sampling for nitrate. If any nitrate result is $\geq 1/2$ the MCL of 45 mg/l (i.e., a result of ≥ 23 mg/l nitrate) then quarterly monitoring must be initiated.

Did your system conduct monitoring for nitrate during 2014 from each source? Yes No

NOTE: If there were any sources that were not monitored because they were offline during 2014, you must contact your local regulatory agency to avoid an enforcement action for failure to monitor.

BACTERIOLOGICAL SAMPLE SITING PLAN

The coliform monitoring regulations require that an updated sample-siting plan be submitted at least every 10 years, and at any time the plan no longer ensures representative monitoring of the system (Section 64422 of Title 22).

Date of current bacteriological sample siting plan: August 2014

DIRECT ADDITIVES

Pursuant to Section 64590, Title 22 of the California Code of Regulations, (effective January 1, 1994), all chemicals or products, including chlorine, added directly to the drinking water as part of a treatment process must meet the ANS/NSF Standard 60. Please complete the following table for each chemical used by this water system. If you are not sure whether a chemical you are using meets this standard, contact the manufacturer or distributor of the chemical.

Name of Chemical	Name of Manufacturer	Purpose of using chemical	Chemical is ANS/NSF Standard 60 certified (Y/N)	Use initiated in 2014 (Y/N)
Sodium Hypochlorite	Univar	Disinfectant	Yes	No
Aluminum Sulfate	NTU, Technologies, Inc.	Coagulant	Yes	No
Propac 9890	NTU, Technologies, Inc	Coagulant Aid	Yes	No
Potassium Permanganate	Carius Corporation	Taste, Odor, and Algacide	Yes	No

INDIRECT ADDITIVES

As of March 9, 2008, a water system shall not use any chemical, material, lubricant, or product in the production, treatment or distribution of drinking water that comes in contact with the drinking water that does not have certification of meeting NSF/ANSI standard 61.

Does your water system have procedures to ensure all future equipment and materials meet this standard? Yes No

If you have any questions on the requirements related to indirect additives, you may contact your local regulatory agency.

COMMENTS:

8. CROSS-CONNECTION CONTROL

	Total Number in System	Number Installed in 2014	Number Tested in 2014	Number Failed in 2014	Number Repaired/ Replaced
Backflow Assemblies on the Service Connections or Meter	333	47	318	35	35
Backflow Assemblies On-site but not on the Service Connections or Meter	0				

No. of Inactive Backflow Prevention Assemblies in water system in 2014: 0
Date of last cross-connection control survey done on the system: November 2011
Cross Connection Control Program Coordinator: William Kagele

Name: William Kagele
Certification Number: (760) 339-2230
Business Phone: william.kagele@navy.mil
Email Address: william.kagele@navy.mil
Certification or training received: Cross-Connection Control, USC, 2002

Describe any cross-connection incidents that occurred during 2014:

COMMENTS: Fifteen devices, added and tested in December, 2013 were not tested in calendar year, 2014. The additional fifteen devices were added to a RV expansion area belonging to MWR in December, 2013. Our Public Works added these fifteen devices to the Base Contract in CY2015. The WTP Operators will be responsible for testing these additional devices starting in CY2015.

9. CONSUMER CONFIDENCE REPORT (does not apply to Transient Noncommunity water systems)

THE 2014 CCR MUST BE DISTRIBUTED TO YOUR CUSTOMERS AND A COPY SUBMITTED TO YOUR LOCAL REGULATORY AGENCY BY JULY 1, 2015. IN ADDITION, PUBLIC WATER SYSTEMS THAT ARE ALSO REGULATED BY THE CALIFORNIA PUBLIC UTILITIES COMMISSION (PUC) MUST MAIL A COPY OF THEIR CCR TO THE PUC BY JULY 1, 2015. CERTIFICATION MUST BE SUBMITTED TO YOUR LOCAL REGULATORY AGENCY BY OCTOBER 1, 2015, STATING THAT THE 2014 CCR HAS BEEN DISTRIBUTED TO CUSTOMERS AND THAT THE INFORMATION IS CORRECT.

The CCR guidance, CCR template, and the certification form can be obtained from the Division of Drinking Water web site at http://www.waterboards.ca.gov/drinking_water/certific/drinkingwater/CCR.shtml

Indicate the date your 2014 CCR was distributed or will be distributed to your customers: 06/30/2015 mm/dd/yyyy
PUBLIC WATER SYSTEMS THAT SERVE 100,000 OR MORE PERSONS ARE REQUIRED TO POST THEIR CCR ON THE INTERNET.

If your water system serves 100,000 or more persons, indicate the date the CCR was or will be posted to the Internet:
If applicable, please provide the URL link to the CCR posted on the Internet:

COMMENTS:

10. OPERATOR CERTIFICATION

A. Please list the State certified Water Treatment Plant Operators employed by your water system that supervise and direct the operation of your water treatment plants, beginning with the chief operator(s).

Your Highest Treatment System Classification is: T3

Name	Grade of Operator/Shift	C/S	Number	Expiration Date
Edgar Beltran	T3	S	32534	04/01/2016
Mark Coon	T3	C	26566	08/01/2017
Joao Garza	T1		35298	07/01/2016

Use "C" for Chief Operator and "S" for Shift Operator. If neither, leave blank.

Do your Chief and Shift Treatment Plant Operators have the minimum level required? Yes

Ketcham, Scott@Waterboards

From: Ketcham, Scott@Waterboards
Sent: Monday, July 13, 2015 8:30 AM
To: 'Kagele, William CIV NAVFAC SW, ELCN'
Cc: Remington, Michel D CIV NAVFAC SW; Sterchi, Sean@Waterboards
Subject: RE: NAF EI Centro 2014 cross connection device testing

Bill.
Thank you for confirming that they were not tested. Please be sure to put them on the top of the queue for being tested this year, if they haven't been tested already.

Scott Ketcham

-----Original Message-----

From: Kagele, William CIV NAVFAC SW, ELCN [<mailto:william.kagele@navy.mil>]
Sent: Monday, July 13, 2015 8:13 AM
To: Ketcham, Scott@Waterboards
Cc: Remington, Michel D CIV NAVFAC SW
Subject: RE: NAF EI Centro 2014 cross connection device testing

Scott,

I confirmed that the additional fifteen devices, added and tested in December, 2013 were not tested in calendar year, 2014. The additional fifteen devices were added to a RV expansion area belonging to MWR in December, 2013. Our Public Works added these fifteen devices to the Base Contract in CY2015. The WTP Operators will be responsible for testing these additional devices starting in CY2015.

R/

Bill Kagele, MS
Water Program Manager
Naval Air Facility EI Centro
1605 Third Street, Bldg. 504
EI Centro, Ca 92243
Office: (760) 339-2532
DSN: 658-2532
<http://www.cnic.navy.mil/EICentro/>

-----Original Message-----

From: Ketcham, Scott@Waterboards [<mailto:Scott.Ketcham@waterboards.ca.gov>]
Sent: Friday, July 10, 2015 9:59 AM
To: Kagele, William CIV NAVFAC SW, ELCN; coon, mark
Cc: Sterchi, Sean@Waterboards
Subject: RE: NAF EI Centro 2014 cross connection device testing

Bill/Mark

NAF lists 333 devices within their distribution system and the 2014 annual report lists only 318 were tested. Discussion with WTP operators indicated that there are additional cross connection devices that have been installed across the base. However, their contract is only for testing 318 of them. The other devices were tested by another entity and those results were not shared with the contract water treatment operators. As a result they could not state whether or not they were tested, how many failed, etc.

Can you please confirm whether or not all 333 of NAF's devices were tested in 2014? If so we need to amend of the electronic report to include these numbers, and in the future make sure that reporting in the annual report is a zero-sum (i.e. total of all devices equals all devices listed as tested, or explained in some other manner)

Hope you have a good weekend

Scott A Ketcham, PE

Associate Sanitary Engineer

State Water Resources Control Board

Division of Drinking Water

San Diego Field Operations Branch

1350 Front St, Suite 2050

San Diego, Ca 92101

Phn (619) 525 - 4395

Fax (619) 525 - 4383

Please note new email: Scott.Ketcham@Waterboards.ca.gov <<mailto:Scott.Ketcham@Waterboards.ca.gov>>

