



State Water Resources Control Board
Division of Drinking Water

October 15, 2014

System No. 3910029

James Bewley, Director of Operations
Oakwood Lake Water District-Mobile Home Park
208 Seaview Drive
Richmond, CA 94801

TRANSMITTAL OF CITATION NO. 03-10-14C-009 FOR FAILURE TO COLLECT LEAD AND COPPER MONITORING

Dear Mr. Bewley

The Oakwood Lake Water District – Mobile Home Park (MHP) failed to conduct lead and copper tap monitoring in the distribution system during the months of June, July, August, or September 2014, as specified in section 64675(b) of the Lead and Copper Monitoring Regulations, Chapter 17.5, Title 22, California Code of regulations. The Division has issued Citation No. 03-10-14C-009, in response to this violation. The citation is being transmitted to the MHP under cover of this letter.

Please respond to the directives of this Citation by the deadlines established with each item. If you have any questions regarding this Citation, please contact Brian Kidwell by email at Brian.Kidwell@waterboards.ca.gov or by phone at (209) 948-3963.

Sincerely,

Bhupinder S. Sahota, P.E.
District Engineer, Stockton District
NORTHERN CALIFORNIA BRANCH
DRINKING WATER FIELD OPERATIONS

Attachments:

Citation No. 03-10-14C-009

Certified Mail No. 7004 2890 0002 0057 9485

H:\Stockton System Files\San Joaquin County\3910029\Enforcement\OLWD MHP CIT cover letter 10-15-14

FELICIA MARCUS, CHAIR | THOMAS HOWARD, EXECUTIVE DIRECTOR

31 E. Channel Street, Room 270, Stockton, CA 95202 | www.waterboards.ca.gov

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STATE OF CALIFORNIA
WATER RESOURCES CONTROL BOARD
DIVISION OF DRINKING WATER

TO: Oakwood Lake Water District – Mobile Home Park
874 E. Woodward Avenue
Manteca, CA 95337

Attn: Mr. James Bewley, Director of Operations
Oakwood Lake Water District – Mobile Home Park

CITATION FOR VIOLATION OF CALIFORNIA CODE OF REGULATIONS, TITLE
22, SECTION 64675(b) - WATER SYSTEM NO. 3910029
CITATION NO. 03-10-14C-009
Issued on October 15, 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 Oakwood Lake Water District – Mobile Home Park (hereinafter, MHP) (874 E.

1 Woodward Avenue, Manteca, CA 95337) for violation of California Code of
2 Regulations (CCR), Title 22, Section 64675 subsection (b).

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APPLICABLE AUTHORITIES

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Section 116650 of California Health and Safety Code provides:

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(a) If the Division determines that a public water system is in violation of
8 this chapter or any regulation, permit, standard, citation, or order issued or adopted
9 thereunder, the Division may issue a citation to the public water system. The citation
10 shall be served upon the public water system personally or by certified mail. Service
11 shall be deemed effective as of the date of personal service or the date of receipt of
12 the certified mail. If a person to whom a citation is directed refuses to accept delivery
13 of the certified mail, the date of service shall be deemed to be the date of mailing.

14

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

17

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

19

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

21

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

25

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1 **California Code of Regulations, Title 22, Section 64675, subsection (b) provides,**
2 **in relevant part:**

3
4 b) During each period, each system conducting reduced tap sampling shall collect at
5 least one sample from the number of sites based on the number of people served
6 specified in table 64675-A under Reduced Tap Sampling, as follows:

7 (1) The sites shall be representative of the sites required for standard tap
8 sampling.

9 (2) The samples shall be collected during the months of June, July, August, or
10 September, unless the Division approves an alternate set of four months based on a
11 review of the system's operations and lead and copper data, in which case the system
12 shall initiate sampling during the alternate set of four months when directed in writing
13 to do so by the Department.

14
15 **STATEMENT OF FACTS**

16 The MHP is operated under Water Supply Permit No. 01-88-023, issued on
17 December 6, 1988.

18
19 Oakwood Lake Water District operates a small water system located approximately
20 five miles outside the City of Manteca. The system is a community water system that
21 serves the residents in the mobile home park near Oakwood Lake. According to the
22 2013 Annual Report to the Division, the MHP serves approximately 114 people
23 through 58 service connections. The MHP purchases treated water from the
24 Oakwood Lake Water District - Subdivision (System No. 3910023). The Oakwood
25 Lake Water District - Subdivision obtains its water supply from two active wells, Well
26 No. 3 and Well No. 4, located on the subdivision property. Both Wells exceed the
27 arsenic MCL of 10 ug/l and manganese MCL of 50 ug/l.

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In addition to the wells, the Oakwood Lake Water District - Subdivision facilities include a manganese and arsenic treatment plant, a 49,000-gallon backwash storage tank, a 500,000-gallon ground-level finished water storage tank, and a booster pump station. The domestic water is routinely disinfected using sodium hypochlorite.

Lead and copper monitoring was initiated by the MHP in 1996. The initial biannual rounds, and two annual rounds, of lead and copper monitoring were completed between 1996 and 1999. After the biannual and annual monitoring was completed, the MHP's number of sample sites was reduced from ten to five. The MHP's monitoring frequency was also reduced from annual to triennial.

Citation No. 03-10-08C-008 was issued, by the Division, to the MHP on November 4, 2008, due to the MHP's failure to conduct lead and copper monitoring between June 1, 2008 and September 30, 2008. Condition one of the citation required lead and copper monitoring to be conducted no later than December 31, 2008 and again between June 1, 2009 and September 30, 2009.

Triennial lead and copper monitoring was conducted in October 2011. The Division accepted the results since the temperatures were in the low 80's and monitoring data indicate lead and copper levels are low in the distribution system. The next round of lead and copper monitoring was due between June 1, 2014, and September 30, 2014. Per an email dated October 13, 2014, from Casey Wichert, the lead operator, MHP lead and copper monitoring was completed in June 2013. The Division did not have records of the June 2013 lead and copper monitoring and requested the laboratory data from the MHP. Upon review, it is noted that the MHP did conduct lead and

1 copper monitoring in June 2013, however only four of the five required samples were
2 collected.

3 Currently the MHP performs triennial reduced tap sampling for lead and copper.
4 Pursuant to Title 22, CCR, Table 64675-A, the MHP is required to collect five
5 distribution system samples. The lead and copper samples shall be collected once
6 every three years during the months of June, July, August, or September, unless the
7 Division approves an alternate set of four months.

8

9

DETERMINATION

10 Since the MHP failed to collect the required number of lead and copper samples from
11 the distribution system, during the June 2013 lead and copper monitoring, and since
12 triennial lead and copper monitoring was not conducted between June 1, 2014 and
13 September 30, 2014, the Division has determined that the MHP failed to comply with
14 the requirements of Section 64675 (b).

15

16

DIRECTIVES

17 The MHP is hereby directed to take the following actions:

18

- 19 1. The MHP shall sample the designated distribution system sites in the MHP's
20 domestic water system for lead and copper in November 2014. The MHP shall
21 collect at least 5 samples during this monitoring round in accordance with
22 Section 64675 (b) of the CCR.

23

24 Note that all lead and copper distribution monitoring shall be conducted using
25 the same sites as were used during the 2011 monitoring. If it is necessary to
26 change a site or sites, the new site(s) address and tier ranking shall be

1 attached to that round's results along with the reason for the change of the
2 sample site(s).

3

4 2. The results of the monitoring shall be submitted to the Division's Stockton
5 District office on the Form 141-AR, which has been provided to the MHP
6 electronically, along with copies of the laboratory results for each site.

7

8 3. If results of the October 2014 monitoring are in compliance with the action
9 levels for both lead and copper, the MHP shall monitor lead and copper again
10 between June 1, 2015, and September 30, 2015. If the results from 2015 are
11 in compliance with the action levels for both lead and copper, the MHP may
12 return to triennial lead and copper monitoring.

13

14 4. Failure to conduct lead and copper tap monitoring is considered a monitoring
15 and reporting violation. As a result, the MHP is required to notify the
16 consumers of this violation in the 2014 Consumer Confidence Report, which is
17 required to be distributed to all customers by July 1, 2015. The MHP must also
18 complete the attached Proof of Notification form and submit it to the Division,
19 with a copy of the Consumer Confidence Report, by October 1, 2015.

20

21 The Division reserves the right to make such modifications to this Citation as it may
22 deem necessary to protect public health and safety. Such modifications may be
23 issued as amendments to this Citation, and shall be deemed effective upon issuance.

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25 Nothing in this Citation relieves the MHP of its obligation to meet the requirements of
26 the California Safe Drinking Water Act, or of any regulation, permit, standard, or order
27 issued or adopted thereunder.



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All submittals required by this Citation shall be submitted to the Division at the following address:

Bhupinder S. Sahota, P.E.
District Engineer, Stockton District
State Water Resources Control Board
Division of Drinking Water
31 E. Channel Street, Room 270
Stockton, CA 9202

PARTIES BOUND

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

SEVERABILITY

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

FURTHER ENFORCEMENT ACTION

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

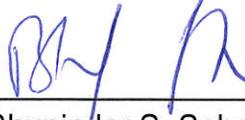
1 violates an order of the Board. The Board does not waive any further enforcement
2 action by issuance of this citation.

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10-15-2014



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Date

Bhupinder S. Sahota, P.E.,
District Engineer, Stockton District
Division of Drinking Water
State Water Resources Control Board

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10 Attachments:

11 1. Proof of Notification Form

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Certified Mail No. 7004 2890 0002 0057 9478

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PROOF OF NOTIFICATION

As required by Section 116450 of the California Health and Safety Code, I notified all users that _____ failed to collect lead and copper monitoring between June 1, 2014 and September 30, 2014.

Notification was made on _____ by _____
(date)

_____ written notice.
hand delivery or posted (circle one)

Signature of Water System Representative

(date)

DISCLOSURE: Be advised that Section 116725 and 116730 of the California Health and Safety Code state that any person who knowingly makes any false statement on any report or document may be liable for a civil penalty not to exceed five thousand (5,000) for separate violation for each day that violation continues. In addition, the violators may be prosecuted in criminal court and upon conviction, be punished by a fine of not more than \$25,000 for each day of violation, or be imprisoned in the county jail not to exceed one year, or by both the fine and imprisonment.

Due By: July 1, 2015

Failed to collect lead and copper monitoring: June 1, 2014 – September 30, 2014

System Number: 3910029

Citation No.: 03-10-14C-009