



State of California—Health and Human Services Agency
California Department of Public Health



RON CHAPMAN, MD, MPH
Director & State Health Officer

EDMUND G. BROWN JR.
Governor

January 24, 2014

Mrs. Katharine J. P. Loudd
Manager
Palo Alto Park Mutual Water Company
2190 Addison Avenue
East Palo Alto, CA 94303

Dear Mrs. Loudd:

CITATION NO. 02-17-14C-003
MANGANESE SECONDARY MAXIMUM CONTAMINANT LEVEL VIOLATION
PALO ALTO PARK MUTUAL WATER COMPANY, WATER SYSTEM NO. 4110020

Enclosed is a citation issued to Palo Alto Park Mutual Water Company (hereafter, Water System or PPMWC). The citation is issued as the Water System failed to comply with Subsection 64449 (a), Chapter 15, Title 22, California Code of Regulations (CCR) and Permit Provision No. 3 of the Permit Amendment to Domestic Water Supply Permit No. 02-88-006 issued to the Water System on June 29, 2007. The water supplied by PPMWC to the public exceeded the Manganese Secondary Maximum Contaminant Level (SMCL) during December 2013.

The attached citation consists of three sections: Violation, Directives, and Civil Penalties. The Violation section describes the events leading up to the issuance of the citation. The Directives section specifies what the Water System needs to do to return to compliance. The Civil Penalty section describes fees to be assessed for failure to comply with the citation. No civil penalty is levied with the current citation.

If you have any questions regarding this letter, please contact Jose P. Lozano IV, P.E. at (510) 620-3459 or me at (510) 620-3453.

Sincerely,

Eric Lacy, P.E.
District Engineer
Santa Clara District
Drinking Water Field Operations Branch

Mrs. Katharine J. P. Loudd
January 24, 2014
Page 2

Enclosures: 1) Attachment A - Sample Manganese SMCL Exceedance Notice
2) Attachment B - Proof of Notification

Certified Mail #7007 0710 0000 5917 2453

cc: San Mateo County Environmental Health Department (via e-mail; w/ encl.)

Mrs. Katharine J. P. Loudd
January 24, 2014
Page 2

Enclosures: 1) Attachment A - Sample Manganese SMCL Exceedance Notice
2) Attachment B - Proof of Notification

Certified Mail #7007 0710 0000 5917 2453

cc: San Mateo County Environmental Health Department (via e-mail; w/ encl.)

bcc: File Server; 4110020\Enforcement\December 2013 Mn SMCL vio citation;
Enforcement File; Chron (all w/ encl.)
W4110020/140122.cit.ltr

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27

STATE OF CALIFORNIA
DEPARTMENT OF PUBLIC HEALTH

Issued January 24, 2014

RE: Palo Alto Park Mutual Water Company
Water System No. 4110020
2190 Addison Avenue
East Palo Alto, CA 94303

TO: Ms. Katherine J. P. Loudd
Manager

CITATION FOR NONCOMPLIANCE

Manganese Secondary Maximum Contaminant Level

December 2013

Section 116650 of Article 9, Chapter 4, Part 12, Division 104 of the California Health and Safety Code (CHSC), authorizes the issuance of a citation for the failure to comply with a requirement of Chapter 4 (California Safe Drinking Water Act), or any regulation, standard, permit or order issued thereunder.

VIOLATION

The Drinking Water Field Operations Branch of the California Department of Public Health (hereinafter, Department) hereby issues a citation to Palo Alto Park Mutual Water Company (hereinafter, Water System or PAPMWC) (mailing address: 2190 Addison Avenue, East Palo Alto, CA 94303) for failure to comply with the Secondary Maximum Contaminant Level



1 (SMCL) for Manganese, as specified in Subsection 64449 (a), Chapter 15, Title 22, California
2 Code of Regulations (CCR) and Permit Provision No. 3 of the Permit Amendment to
3 Domestic Water Supply Permit No. 02-88-006 issued to the Water System on June 29, 2007.
4 Subsection 64449 (a), CCR, specifies that a community water system shall not exceed a
5 Manganese level of 0.05 milligrams per liter (mg/L) in the drinking water supplied to the
6 public. Permit Provision No. 3 of the Permit Amendment to Domestic Water Supply Permit
7 No. 02-88-006 issued to the Water System on June 29, 2007 specifies that PPMWC shall
8 at all times provide proper blending to the water produced by the Wells 02 and 07 so that the
9 water supplied into the distribution system is in compliance with the Iron and Manganese
10 Maximum Contaminant Levels (MCLs). In December 2013, the drinking water supplied by
11 PPMWC, as collected on December 17, 2013 from its Water Storage Tank Effluent (aka
12 Tank Effluent; Primary Station Code (PSC) No. 4110020-007) monitoring location, had a
13 Manganese level of 0.07 mg/L. Therefore, the Water System violated the Manganese SMCL
14 and Permit Provision No. 3 of the Permit Amendment to Domestic Water Supply Permit No.
15 02-88-006 issued to the Water System on June 29, 2007 during December 2013.
16

17 DIRECTIVES

18
19 The Water System is hereby directed to take the following actions:

- 20 1) Cease and desist violating Subsection 64449 (a), Chapter 15, Title 22, California Code of
21 Regulations (CCR) and Permit Provision No. 3 of the Permit Amendment to Domestic
22 Water Supply Permit No. 02-88-006 issued to the Water System on June 29, 2007
23 immediately.
24
25 2) Conduct public notification for the Manganese SMCL violation in conformance with
26 Section 64463.4(c), Chapter 15, Title 22, CCR within thirty (30) days upon receipt of this
27 citation. The notification shall be completed in accordance with the following methods:



- 1 a. Mail or direct delivery to each customer receiving a bill including those that
2 provide their drinking water to others (e.g., schools or school systems, apartment
3 building owners or large private employers), and other service connections to
4 which water is delivered by the water system, and
- 5 b. Use of one or more of the following methods to reach persons not likely to be
6 reached by a mailing or direct delivery (renters, etc.):
- 7 1. Publication in a local newspaper;
 - 8 2. Posting in conspicuous public places served by the water system, or on
9 the Internet; or
 - 10 3. Delivery to community organizations.

11 A sample copy of public notification for your use in notifying the public and your
12 employees is enclosed for your reference and use (Attachment A). Department
13 approval of the proposed notice is required prior to performing notification. Complete
14 Attachment B (Proof of Notification form) and return it to the Department by February
15 28, 2014. A copy of the notice used shall be attached to the Proof of Notification
16 form.
17

- 18 3) Investigate the Manganese SMCL exceedance event and prepare a written Corrective
19 Action Plan (CAP) based on the investigation findings. The CAP shall include an
20 evaluation of the causes of the SMCL exceedance event and the specific measures to be
21 taken to ensure that future SMCL violations will not occur. The Water System must
22 include operational and compliance monitoring in the CAP. At a minimum, this is to
23 include at least monthly iron and manganese sampling at the Water Storage Tank
24 Effluent compliance sampling location and have the results analyzed and submitted
25 electronically to the Department by a certified laboratory. Submit the CAP to the
26 Department by February 28, 2014.
27



1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27

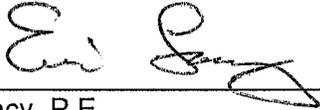
All submittals to the Department are to be addressed to:

Mr. Eric Lacy, P.E., District Engineer
California Department of Public Health
Drinking Water Field Operations Branch
850 Marina Bay Parkway, Bldg P, 2nd Fl
Richmond, CA 94804

CIVIL PENALTY

Subsections 116650(d) and 116650(e), CHSC, allow for the assessment of a civil penalty for failure to comply with the requirements of Chapter 4. No civil penalty is assessed with this citation. Failure to comply with any provision of this citation may result in the Department imposing a civil penalty of up to one thousand dollars (\$1,000.00) per day as of the date of violation of the provision.

January 24, 2014
Date


Eric Lacy, P.E.
District Engineer
Santa Clara District
Drinking Water Field Operations Branch

Attachments
CERTIFIED MAIL # 7007 0710 0000 5917 2453

cc: San Mateo County Environmental Health Department (via e-mail, w/ attachments.)

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27

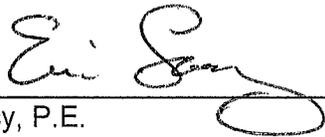
All submittals to the Department are to be addressed to:

Mr. Eric Lacy, P.E., District Engineer
California Department of Public Health
Drinking Water Field Operations Branch
850 Marina Bay Parkway, Bldg P, 2nd Fl
Richmond, CA 94804

CIVIL PENALTY

Subsections 116650(d) and 116650(e), CHSC, allow for the assessment of a civil penalty for failure to comply with the requirements of Chapter 4. No civil penalty is assessed with this citation. Failure to comply with any provision of this citation may result in the Department imposing a civil penalty of up to one thousand dollars (\$1,000.00) per day as of the date of violation of the provision.

January 24, 2014
Date


Eric Lacy, P.E.
District Engineer
Santa Clara District
Drinking Water Field Operations Branch

Attachments
CERTIFIED MAIL # 7007 0710 0000 5917 2453

cc: San Mateo County Environmental Health Department (via e-mail, w/ attachments.)

bcc: File Server: 4110020\Enforcement\December 2013 Mn SMCL vio citation;
Enforcement File, Chron (all w/ attachments)
W4110020/140121.Cit

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.

Palo Alto Park Mutual Water Company Has Levels of Manganese Above the Secondary Drinking Water Standard in December 2013

Our water system recently violated the Secondary Maximum Contaminant Level (MCL) for manganese in December 2013. Although this is not an emergency, as our customers, you have a right to know what you should do, what happened, and what we are doing to correct this situation.

We routinely monitor for the presence of drinking water contaminants. Water sample results received on December 17, 2013 showed a manganese level of 0.07 mg/L. This is above the manganese secondary standard or maximum contaminant level (MCL) of 0.05 mg/L.

What should I do?

- **You do not need to use an alternative water supply (e.g., bottled water).**
- This is not an immediate risk. If it had been, you would have been notified immediately.
- 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?

[Describe corrective action]. We anticipate resolving the problem within [estimated time frame].

For more information, please contact [name of contact] at [phone number] or [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 Palo Alto Park Mutual Water Company

State Water System ID#: 4110020. Date distributed: _____.

PROOF OF NOTIFICATION

Citation Number 02-17-14C-003

Palo Alto Park Mutual Water Company
System Number: 4110020

As required by Section 116450 of the California Health and Safety Code, I notified the users of the water supplied by the Palo Alto Park Mutual Water Company of the violations of Title 22, California Code of Regulations (CCR) for the compliance period of December 2013. I complied with the directives of this citation as indicated below:

Required Action

Date Completed

Conduct Public Notification – (Attach copy of the notice.)

Submit Corrective Action Plan

Signature of Water System Representative

Date

THIS FORM MUST BE COMPLETED AND RETURNED TO THE DEPARTMENT. A COPY OF THE POSTED NOTICE MUST BE ATTACHED TO THIS FORM.

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 citation 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.