



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

February 25, 2014

Mr. Terence Kyaw
Assistant Public Works Director
City of Redwood City
1400 Broadway
Redwood City, CA 94063

Dear Mr. Kayaw:

CITATION NO. 02-17-14C-004
TOTAL COLIFORM RULE MAXIMUM CONTAMINANT LEVEL VIOLATION
CITY OF REDWOOD CITY, WATER SYSTEM NO. 4110022

Enclosed is a citation issued to the City of Redwood City (hereafter, Water System or City). The citation is issued as the Water System failed to comply with Section 64426.1(b)(1), Chapter 15, Title 22, California Code of Regulations (CCR). The total coliform maximum contaminant level was not met during January 2014.

The attached citation consists of three sections: Violation, Background, Directives, and Civil Penalties. The Violation and Background sections describe 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

Mr. Terence Kyaw
February 25, 2014
Page 2

Enclosures: 1) Sample Notice
2) Proof of Notification

Certified Mail 7007 0710 0000 5917 2484

cc: San Mateo County Environmental Health Department (w/ encl.)

Mr. Terence Kyaw
February 25, 2014
Page 2

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2) Proof of Notification

Certified Mail 7007 0710 0000 5917 2484

cc: San Mateo County Environmental Health Department (w/ encl.)

bcc: File Server; 4110022\Enforcement\January 2014 TCR MCL citation; Enforcement
File; Chron (all w/ encl.)
W4110022/140224.cit.ltr

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**STATE OF CALIFORNIA
DEPARTMENT OF PUBLIC HEALTH**

RE: Water System No. 4110022
City of Redwood City
1400 Broadway
Redwood City, CA 94063

TO: Mr. Terence Kyaw
Assistant Public Works Director

**CITATION FOR NONCOMPLIANCE
Maximum Contaminant Level – Total Coliform Bacteria
January 2014**

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

Violation

The Drinking Water Field Operations Branch of the Department of Public Health (hereinafter, Department) hereby issues a citation to the City of Redwood City (hereinafter, Water System or City) (Mailing address: 1400 Broadway, Redwood City, CA) for failure to comply with Section 64426.1(b)(1), Chapter 15, Title 22,

3 California Code of Regulations (CCR). Specifically, the Water System failed to
4 comply with the maximum contaminant level (MCL) for total coliform bacteria
5 during the month of January 2014.

6 Section 64426.1(b)(1) specifies that the water supplier collecting at least 40
7 samples per month is in violation of the total coliform MCL when more than five
8 (5.0) percent of the samples collected during any month is total coliform-positive.
9 During January 2014, the Water System collected 110 routine and repeat
10 samples, of which six samples, or 5.4 percent, were total coliform-positive and *E.*
11 *coli*-negative. This resulted in a violation of Section 64426.1(b)(1), CCR.

12
13
14 In accordance with Section 116650(e), CHSC, this violation is classified as a
15 non-continuing violation.

16 Background

17
18 The City is a community water system, which serves domestic water to an
19 estimated population of 84,557—via 23,479 service connections (2012 Annual
20 Report to the Department). The City is located on the San Francisco Peninsula
21 in San Mateo County, approximately 27 miles south of San Francisco and 24
22 miles north of San Jose. The water system provides water to the City of
23 Redwood City and some areas outside the City limits, including Cañada College
24 and the Emerald Lake Hills area. The City's office is in its Corporation Yard,
25 located at 1400 Broadway in Redwood City.
26

27 Water supplied to the City is purchased from SFPUC, a permitted water system.



1
2 The City's water system consists of thirteen purchased water turnouts, ten
3 emergency interties with California Water Service Company (CWSC), Mid-
4 Peninsula Water District (MPWD) and the City of Menlo Park, twelve storage
5 tanks, and ten pump stations to supply water to a distribution system, which
6 comprises sixteen pressure zones. The tanks have a total capacity of
7 approximately 21.24 million gallons (MG). Based on the Department-approved
8 bacteriological sample siting plan (BSSP) dated December 10, 2008 on file, the
9 Water System is required to collect and have analyzed a minimum of 23
10 distribution system samples per week.
11

12
13 The Water System collected 23 routine bacteriological samples on January 14,
14 2014, six of which were total coliform positive and *E.coli* negative. The 18 repeat
15 samples collected on January 16, 2014 were all negative for coliforms.
16

17 With six of the 110 bacteriological water samples, or 5.4 percent, positive for total
18 coliform, the Water System is in violation of the total coliform MCL during
19 January 2014.
20

21 In accordance with Section 64426, Title 22, CCR, the exceedance of the total
22 coliform MCL is a criterion indicating a possible significant rise in bacterial count.
23 The Water System was required to notify the Department of the significant rise in
24 bacterial count within 24 hours after determining that it exceeded the MCL.
25 However, the City did not notify the Department at that time and is consequently
26 in violation of the reporting requirements specified in Section 64426 (b)(2), Title
27 22, CCR.



3 The Water System first notified the Department via telephone on February 12,
4 2014 that it exceeded the total coliform MCL by having more than five percent of
5 the total bacteriological samples collected in January 2014 positive for total
6 coliform. A copy of the analytical results and a summary of all required samples
7 collected by the City during January 2014 were provided to the Department via e-
8 mail on February 13, 2014, which is three days after the reporting deadline,
9 specified in Section 64423.1 (c), Title 22, CCR.

10
11 The Water System initiated public notification to inform its customers of the
12 January 2014 total coliform MCL violation on February 20, 2014.

13
14 Directives

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

- 16
- 17 1. Immediately cease and desist from failing to comply with Section 64426.1
18 (b)(1), Chapter 15, Title 22, CCR.
 - 19
20 2. Complete and return the enclosed Proof of Notification form by March 7,
21 2014. A copy of the notice used shall be attached to the Proof of
22 Notification form.
 - 23
24 3. Prepare a written Corrective Action Plan (CAP), based on your findings of
25 the investigation of the bacteriological contamination problem. The plan
26 shall include an evaluation of the causes that led to this incident, the
27 follow-up actions taken to correct the problem, and preventive measures
to be taken to prevent the reoccurrence of bacteriological contamination



3 in the future and to ensure that the City appropriately notifies the
4 Department about significant water quality events and also submits
5 monitoring reports to the Department in a timely manner. Submit the
6 report to the Department by April 2, 2014.

7
8
9 All submittals to the Department are to be addressed to:

10
11 Mr. Eric Lacy, P.E.
12 District Engineer
13 Santa Clara District
14 Department of Public Health
15 Drinking Water Field Operations Branch
16 850 Marina Bay Parkway
17 Building P, 2nd Floor
18 Richmond, CA 94804-6403
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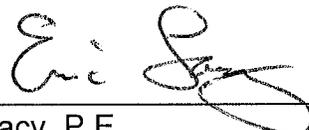


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4 Civil Penalty

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6 Sections 116650(d) and 116650(e), CHSC allow for the assessment of a civil
7 penalty for failure to comply with the requirements of Chapter 4.

8
9 Failure to comply with any provision of this citation will result in the Department
10 imposing a civil penalty not to exceed one thousand dollars (\$1000) per day as of
11 the date of violation of any provision of this citation.

12 February 25, 2014
13 Date

14 
Eric Lacy, P.E.
District Engineer
Santa Clara District
Drinking Water Field Operations Branch

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24 Attachments

25 CERTIFIED MAIL # 7007 0710 0000 5917 2484

26 cc: San Mateo County Environmental Health Department (w/ attachments)

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3
4 Civil Penalty

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6 Sections 116650(d) and 116650(e), CHSC allow for the assessment of a civil
7 penalty for failure to comply with the requirements of Chapter 4.

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9 Failure to comply with any provision of this citation will result in the Department
10 imposing a civil penalty not to exceed one thousand dollars (\$1000) per day as of
11 the date of violation of any provision of this citation.

12 February 25, 2014
13 Date

14 Eric Lacy
15 Eric Lacy, P.E.
16 District Engineer
17 Santa Clara District
18 Drinking Water Field Operations Branch

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24 Attachments

25 CERTIFIED MAIL # 7007 0710 0000 5917 2484

26 cc: San Mateo County Environmental Health Department (w/ attachments)
27 bcc: Fileserver – 4110022\Enforcement\January 2014 TCR MCL vio Cit
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PROOF OF NOTIFICATION

Citation Number 02-17-14C-004

City of Redwood City
System Number: 4110022

As required by Section 116450 of the California Health and Safety Code, I notified the users of the water supplied by the City of Redwood City of the violations of Title 22, California Code of Regulations (CCR) for the compliance period of January 2014. I complied with the directives of this citation as indicated below:

Required Action

Date
Completed

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

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.

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.

City of Redwood City Has Levels of Coliform Bacteria Above the Drinking Water Standard

Our water system recently violated a drinking water standard. Although this is 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. We took 110 samples to test for the presence of coliform bacteria during January 2014. 5.45% of our samples showed the presence of total coliform bacteria. The standard is that no more than 5.00% may do so.

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 system's 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, and further testing shows that this problem has been resolved.**
- 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 U.S. 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 was done?

The City of Redwood City took 92 samples for the month of January 2014 and 6 samples showed the presence of total coliform bacteria. We immediately performed 18 additional sampling (Repeat Samples) and none of the Repeat Samples showed presence of total coliform bacteria.

Following an investigation the City of Redwood City concluded the positive results of six (6) total coliform samples collected on January 14, 2014 resulted from the combination of contamination

of one sample collected at a station located near a sanitary sewer pump station and cross-contamination to the other five (5) samples due to inadequate handling procedures during transportation. Redwood City intends to prevent events such as this from re-occurring in the future by implementing items in a corrective action plan.

Items to be included in the Corrective Action Plan are:

1. Develop and implement a standard operating procedure for the routine maintenance and cleaning for dedicated sampling stations.
2. Revise the standard operating procedure for total coliform samples to prevent samples from being cross contaminated during transportation.
3. Relocate all sample stations in proximity to sewer and other facilities of concern to a nearby area, yet still representative of the distribution system it services.
4. Replacement of all dedicated sample stations with new equipment to current standards.
5. Provide training to Staff on new and revised Standard Operating Procedures.

For more information, please contact Justin Chapel at (650) 780-7464 or 1400 Broadway Street, Redwood City, CA 94063.

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 City of Redwood City

State Water System ID#: 4110022. Date distributed: _____.