CALIFORNIA
Water Boards

EDMUND G. BROWN JR.
GOVERNOR

MATTHEW RODRIQUEZ
SECRETARY FOR
ENVIRONMENTAL PROTECTION

State Water Resources Control Board
Division of Drinking Water

June 15, 2016

Ms. Katherine Loudd
Palo Alto Park Mutual Water Company
2190 Addison Avenue
Palo Alto, CA 94303

Dear Ms. Loudd:

CITATION NO. 02-17-16C-020 – VIOLATION OF PERMIT PROVISION 3
Palo Alto Park Mutual Water Company, Water System No. 4110020

Enclosed is a citation issued to Palo Alto Park Mutual Water Company (PAPMWC) for failure to comply with Permit Provision 3 of Permit Amendment 1 to the Domestic Water Supply Permit No. 02-88-006. Specifically, PAPMWC failed to provide proper blending to the water produced by Well 07 so that the water supplied into the distribution system is in compliance with the iron maximum contaminant level for samples collected on April 5, 2016 and April 12, 2016.

If you have any further questions regarding this letter, please contact Ms. Van Tsang at (510) 620-3602.

Sincerely,

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

cc: San Mateo County Environmental Health

STATE OF CALIFORNIA

WATER RESOURCES CONTROL BOARD

DIVISION OF DRINKING WATER

TO: Palo Alto Park Mutual Water Company
2190 Addison Avenue
Palo Alto, CA 94303

Attn: Ms. Katherine Loudd

CITATION FOR VIOLATION OF PERMIT PROVISION 3

WATER SYSTEM NO. 4110020

CITATION NO. 02-17-16C-020

Issued on June 15, 2016

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 Palo Alto Park Mutual Water Company (hereinafter, "PAPMWC" or "Water System") (2190 Addison Avenue, Palo Alto, CA 94303) for violating Permit Provision 3 of Permit Amendment 1 to the Domestic Water Supply Permit No. 02-88-006.

COURT PAPER
STATE OF CALIFORNIA
STD. 113 (REV. 3-95)
OSP 05 90192

APPLICABLE AUTHORITIES

Section 116650 of California Health and Safety Code provides:

(a) If the Division 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 Division 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 Division 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.

COURT PAPER
STATE OF CALIFORNIA
STD. 113 (REV. 3-95)
OSP 05 90192

Permit Provision 3 of Permit Amendment 1 to the Domestic Water Supply Permit No. 02-88-006 provides in relevant part:

Palo Alto Park Mutual Water Company shall at all times provide proper blending to the water produced by Well 07 so that the water supplied into the distribution system is in compliance with the iron and manganese maximum contaminant level. Proper treatment shall be demonstrated by sampling the water storage tank effluent.

STATEMENT OF FACTS

Palo Alto Park Mutual Water Company is a community water system that provides potable water to approximately 2,500 persons through 692 metered connections. The Water System consists of five groundwater wells – Well 02 (Primary Station Code (PSC) No. 4110020-002), Well 03 (PSC No. 4110020-003), Well 05 (PSC No. 4110020-004), Well 06 (PSC No. 4110020-005) and Well 07 (PSC No. 4110020-006); two storage tanks – a 350,000 gallon welded steel storage tank and a 11,500-gallon steel storage tank; two booster pumps and a distribution system.

Water produced from Well 07 exceeds the iron and manganese maximum contaminant level (MCL) of 0.3 mg/L and 0.05 mg/L, respectively. As such, PAPMWC is required within Permit Amendment 1, issued on July 1, 2007, to blend the water produced from Well 07 with Wells 02, 03, 05 and/or 06 within the 350,000 gallon storage tank, under specified operation modes. Compliance for iron and manganese is determined weekly after the storage tank using laboratory analyses.

Palo Alto Park Mutual Water Company collected an iron and manganese sample after the storage tank on April 5, 2016 and April 12, 2016. The iron results were 0.74 mg/L and 0.34 mg/L, respectively. The manganese results were non-detect.

DETERMINATION

The Division has determined that Palo Alto Park Mutual Water Company failed to comply with the Permit Provision 3 of Permit Amendment 1 to the Domestic Water Supply Permit No. 02-88-006. Specifically, PAPMWC failed to provide proper blending to the water produced by Well 07 so that the water supplied into the distribution system is in compliance with the iron maximum contaminant level for samples collected on April 5, 2016 and April 12, 2016.

DIRECTIVES

Palo Alto Park Mutual Water Company is hereby directed to take the following actions:

1. Forthwith, PAPMWC shall cease and desist from failing to comply with Permit Provision 3 of Permit Amendment 1 to the Domestic Water Supply Permit No. 02-88-006.

2. Within 30 days of receipt of this Citation, PAPMWC shall produce and provide to the Division a Corrective Action Plan (CAP). The CAP shall include an evaluation of the cause(s) of the iron exceedance and the milestones and timeline to install an iron and manganese removal treatment system.

COURT PAPER
STATE OF CALIFORNIA
STD. 113 (REV. 3-95)
OSP 05 90192

3. Within 30 days of receipt of this Citation, PAPMWC shall conduct public notification for the iron secondary maximum contaminant level violation in conformance with CCR, Title 22, Chapter 15, Section 64463.4. The notification shall be completed in accordance with the following methods:

    a. Mail or direct deliver 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, 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.

4. Within 40 days of receipt of this Citation, PAPMWC shall provide to the Division certification of public notification using the enclosed form (Attachment No. 1). A copy of the notice shall be attached to the certification form.

5. Within 10 days of receipt of this Citation, PAPMWC shall agree in writing to comply with all directives of this Citation.

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

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

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

Eric Lacy, P.E.
District Engineer
State Water Resources Control Board
Division of Drinking Water
850 Marina Bay Parkway
Building P, 2nd Floor
Richmond, CA 94804

PARTIES BOUND

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

SEVERABILITY

The Directives of this Citation are severable, and PAPMWC 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 violates an order of the Board. The Board does not waive any further enforcement action by issuance of this citation.

June 15, 2016
Date

Eric Lacy, P.E.
District Engineer
Division of Drinking Water
State Water Resources Control Board

Attachment 1: Proof of Notification

cc: San Mateo County Environmental Health

certified mail # 7015 1730 0000 9907 7282

COURT PAPER
STATE OF CALIFORNIA
STD. 113 (REV. 3-95)
OSP 05 90192

ATTACHMENT 1

PROOF OF COMPLIANCE
Citation Number 02-17-16C-020
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 iron maximum contaminant level exceedance for samples collected on April 5, 2016 and April 12, 2016.

I complied with the directives of this citation as indicated below:

Required Action	*Date Completed*
1. Public notification	
a. Mal or direct delivery to all customers	_____
b. Posting in conspicuous places	_____

_____ _____

Signature of Water System Representative *Date*

THIS FORM MUST BE COMPLETED AND RETURNED TO THE DEPARTMENT. A COPY OF THE DELIVERED OR MAILED 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.

Palo Alto Park Mutual Water Company
Has Levels of Iron 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 are doing to correct this situation.

We routinely monitor for the presence of drinking water contaminants. Water sample results received on April 5, 2016 and April 12, 2016 showed iron levels of 0.74 mg/L and 0.34 mg/L. This is above the standard, or maximum contaminant level (MCL), of 0.3 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: _____.