



EDMUND G. BROWN JR.  
GOVERNOR



MATTHEW RODRIGUEZ  
SECRETARY FOR  
ENVIRONMENTAL PROTECTION

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**State Water Resources Control Board**  
Division of Drinking Water

August 19, 2015

System No. 4500006

Certified Mail  
7012 3460 0003 1113 1410

Shasta County Department of Public Works  
1855 Placer Street  
Redding, CA 96001

Attn: Eric Wedemeyer, Supervising Engineer

TRANSMITTAL OF CITATION NO. 01-02-15(C)011

The State Water Resources Control Board Division of Drinking Water has issued the Shasta County Service Area No. 2 – Sugarloaf a citation, which is attached.

If you have any questions regarding this matter, please call staff engineer Steve Watson at (530) 224-4828 or me at (530) 224-4800.

A handwritten signature in black ink that reads "Michael J. McNamara".

Michael J. McNamara, P.E.  
Lassen District Engineer  
Drinking Water Field Operations Branch

cc: Richard Hinrichs, Northern California Section Chief, DDW

Enclosure: Citation No. 01-02-15(C)011

KEC \ 4500006 Shasta CSA No. 2 – Sugarloaf \ File: Enforcement

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**STATE OF CALIFORNIA**  
**STATE WATER RESOURCES CONTROL BOARD**  
**DIVISION OF DRINKING WATER**

**TO:** Shasta County Service Area No. 2 - Sugarloaf  
1855 Placer Street  
Redding, CA 96001

**Attn:** Eric Wedemeyer, Supervising Engineer

**CITATION FOR VIOLATION OF CALIFORNIA CODE OF REGULATIONS,**  
**TITLE 22, SECTION 64534 - WATER SYSTEM NO. 1800632**  
**CITATION NO. 01-02-15(C)011**  
**Issued on August 19, 2015**

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 Shasta County Service Area No. 2 - Sugarloaf (hereinafter, CSA), located south of Lakehead

1 along Shasta Lake, for violation of California Code of Regulations (CCR), Title 22,  
2 Section 64534 subsection (f) and (g).

3  
4 **APPLICABLE AUTHORITIES**

5 **Section 116650 of California Health and Safety Code provides:**

6  
7 (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  
23 each day that a violation continues to occur. A separate penalty may be assessed for  
24 each violation.

25  
26 **California Code of Regulations, Title 22, Section 64534, subsections (f) and (g)**  
27 **provides in relevant part:**



1 (f) Systems that fail to monitor shall be in violation of the monitoring  
2 requirements for the entire monitoring period that a monitoring result would  
3 be used in calculating compliance with MCLs or MRDLs, and shall notify the  
4 public pursuant to sections 64463, 64463.7, and 64465, in addition to  
5 reporting to the State Board pursuant to sections 64537 through 64537.6.

6  
7 (g) Systems that fail to monitor in accordance with the monitoring plan required  
8 by section 64534.8 shall be in violation of the monitoring requirements, and  
9 shall notify the public pursuant to sections 64463, 64463.7, and 64465, in  
10 addition to reporting to the Department pursuant to sections 64537 through  
11 64537.6.

12  
13 **California Code of Regulations, Title 22, Section 64534.8, subsections (a)**  
14 **provides in relevant part:**

15  
16 (a) A system shall develop and submit to the State Board a monitoring plan.  
17 The system shall implement the plan after State Board review and approval.  
18 The system shall maintain the plan and make it available for inspection by  
19 the general public no later than 30 days following the applicable compliance  
20 date in sections 64530(a) or (b), and (d).

21  
22 **California Code of Regulations, Title 22, Section 64535.2, subsections (b)(1)**  
23 **provides in relevant part:**

24  
25 (b) TTHM and HAA5 MCL compliance, as monitored pursuant to section  
26 64534.2(a), shall be determined as follows:

1 (1) For systems monitoring quarterly, the running annual arithmetic  
2 average, computed quarterly, of quarterly arithmetic averages of all  
3 samples collected pursuant to section 64534.2(a) shall not exceed  
4 the MCLs specified in section 64533;

5  
6 **STATEMENT OF FACTS**

7 The Shasta County Department of Public Works operates the CSA to serve the  
8 Sugarloaf subdivision, located just south of the community of Lakehead along Shasta  
9 Lake. There are 60 service connections that serve a population of 160. The water  
10 system includes a groundwater well that operates year round and a surface water  
11 treatment facility that typically operates from December through June. Both surface  
12 water and groundwater are treated with chlorine.

13  
14 The CSA is required to monitor total trihalomethanes (TTHMs) and Haloacetic acids  
15 (HAA5s) quarterly at locations in the distribution system that represent the maximum  
16 residence time. Quarterly monitoring is required for systems that have not met the  
17 reduced monitoring requirements for TTHMs and HAA5s. The CSA has been  
18 routinely monitoring these contaminants at four monitoring locations (Lake Drive,  
19 Shale Drive, Shasta Street, and Shore Drive); however the CSA has failed to collect a  
20 complete series of quarterly samples at any of these locations. MCL compliance is  
21 determined based on a running annual average concentration, computed quarterly.

22  
23 The CSA submitted an undated TTHM and HAA5 Sample Siting Plan that identified  
24 four sample locations in the distribution system (Lake Drive, Shale Drive, Shasta  
25 Street, and Shore Drive) to be sampled on a rotational schedule throughout the year.  
26 The CSA also submitted a Disinfection Byproduct (DBP) Compliance Monitoring Plan,  
27 dated October 21, 2014, that identified two DBP sample sites, one on Lake Drive and



1 the other on Shale Drive. The CSA has failed to monitor TTHMs and HAA5s in  
2 accordance with this monitoring plan, as shown in Table 1. After working with the  
3 Division, a revised DBP Compliance Monitoring Plan, dated June 15, 2015, was  
4 submitted to the Division that identifies approved DBP sample locations on Lake Drive  
5 and Shore Drive.

6  
7 The CSA has a history of disinfection byproduct MCL violations. Prior to the year  
8 2014, the CSA was regulated by Shasta County Environmental Health Division  
9 (County). On December 30, 2009, the County issued the CSA a Citation for violation  
10 of the drinking water standard for HAA5s. On November 15, 2010, the CSA received  
11 a Citation for violating the drinking water standard for TTHMs and HAA5s. The  
12 County directed the CSA, on November 15, 2010, to continue quarterly monitoring for  
13 TTHMs and HAA5s, provide public notification to CSA water users of the MCL  
14 violation, and provide a letter indicating proposed plans and a time frame to reduce  
15 the level of disinfection byproducts in the water supply. To date, the CSA has not  
16 submitted a plan for reducing disinfection byproducts in the water supply and  
17 according to County records, public notification was not provided.

18

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**Table 1. Disinfection Byproduct Monitoring Results**

Date	Lake Drive		Shale Drive		Shasta St		Shore Drive	
	TTHM MCL = 80 µg/L, Reduced Monitoring Trigger = 40 µg/L							
	HAA5 MCL = 60 µg/L, Reduced Monitoring Trigger = 30 µg/L							
	TTHM	HAA5	TTHM	HAA5	TTHM	HAA5	TTHM	HAA5
2/26/2012	17.1	32.1	30.2	40.1				
5/29/2012	52.4	49.5					53.8	47.2
8/12/2012			4.7	2.4	0.6	0		
2/27/13	3.9	3.8	5.3	1.86				
5/31/2013	2.9	1.0					1.4	2.9
8/29/13			2.2	0	66.2	185		
11/24/13 <sup>2</sup>	9.1	2.7						
11/24/13 <sup>1</sup>	1.7	0						
3/2/2014	2.2	4.1	11	6.5				
5/27/2014	51.4	83.4					53.4	112
9/1/2014			1.1	0	1.1	0		
11/30/2014 <sup>1</sup>	5.8	1.6						
11/30/2014 <sup>2</sup>	5.7	1.7						
3/1/2015 <sup>1</sup>	55.8	58.9						
3/1/2015 <sup>2</sup>	60.9	69.2						

2

<sup>1</sup>Lake Drive south end of line

3

<sup>2</sup>Lake Drive west end of line

4

Note: All results shown in units of µg/L

5

**DETERMINATION**

6

The Division has determined that the CSA violated Section 64534 (f) and (g), Title 22 of the CCR, in that the CSA failed to monitor for DBPs in accordance with an approved Monitoring Plan.

9

10

**DIRECTIVES**

11

The CSA is hereby directed to take the following actions:

12

13

1. The CSA shall submit to the Division, by **September 30, 2015**, a Corrective Action Plan to achieve compliance with the relevant sections of the California Code of Regulations, described in the findings above.

14

15



1 2. Within 30 days of the issuance of this Citation but in no case later than  
2 **September 30, 2015**, notify all persons served by the CSA of the monitoring  
3 violation as required by Section 64463, 64463.7 and Section 64465, Title 22, of  
4 the CCR. Notification shall be completed in accordance with each of the  
5 following:

- 6 a. Mail or direct delivery of the notice contained in Attachment 'A' to each  
7 customer, and
- 8 b. Posting in conspicuous public places within the service area or on the  
9 internet to reach persons not likely to be reached by mailing or direct  
10 delivery.

11 Changes and/or modifications to Attachment 'A' shall not be made unless  
12 approved by the division.

13 3. Complete and return Attachment 'B' entitled "Compliance Certification" by  
14 **October 10, 2015**. A copy of the notices used to provide public notification  
15 shall be attached to the form.

16 4. The CSA shall initiate quarterly monitoring of disinfection byproducts by no  
17 later than **September 30, 2015**, in accordance with the approved disinfection  
18 byproduct monitoring plan, dated June 15, 2015.

19  
20 All documents required by this Citation shall be submitted to the Division to the  
21 following address:

22  
23 Michael J. McNamara, P. E.  
24 Lassen District Engineer  
25 State Water Resources Control Board  
26 Division of Drinking Water  
27 364 Knollcrest Drive, Suite 101  
28 Redding, CA 96002  
29 (530) 224-4800

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

Nothing in this Citation relieves the CSA of its obligation to meet the requirements of Health and Safety Code, Division 104, Part 12, Chapter 4 (California Safe Drinking Water Act), or any regulation, permit, standard or order issued or adopted thereunder.

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 effective upon issuance.

**PARTIES BOUND**

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

**SEVERABILITY**

The Directives of this Citation are severable, and the CSA 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, standard 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

1 Board to take action to suspend or revoke a permit that has been issued to a public  
2 water system if the system has violated applicable law or regulations or has failed to  
3 comply with an order of the Board; and to petition the superior court to take various  
4 enforcement measures against a public water system that has failed to comply with  
5 an order of the Board. The Board does not waive any further enforcement action by  
6 issuance of this citation.

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9 August 19, 2015  
10 Date

  
11 Michael J. McNamara, Lassen District Engineer  
12 Northern California Section  
13 Division of Drinking Water  
14 State Water Resources Control Board

15 Attachments:

- 16 'A' Public Notification: Monitoring Requirements not met for Shasta
- 17 County Service Area #2 – Sugarloaf
- 18 'B' Compliance Certification Form



## 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.*

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### Monitoring Requirements not met for Shasta County Service Area #2 – Sugarloaf (CSA)

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Our water system recently failed to monitor drinking water in accordance with the 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. The CSA is required to monitor for total trihalomethanes (TTHMs) and Haloacetic acids (HAA5s) quarterly at locations in the distribution system that represent the maximum residence time. TTHMs and HAA5s are chlorine disinfection byproducts. The CSA has conducted routine monitoring for these contaminants in the distribution system at four monitoring locations in the distribution system; however the CSA has failed to collect a complete series of quarterly samples at approved locations. The CSA has worked with the State Water Resources Control Board Division of Drinking Water to develop an approved Disinfection Byproduct Monitoring plan that specifies two locations in the distribution system that will be monitored each quarter.

#### Additional Information

The table below lists the contaminant(s) we did not properly test for during 2014 and 2015.

Contaminant	Required sampling frequency
TTHMs HAA5s	Quarterly at locations representing maximum residence time

To protect drinking water from disease-causing organisms, or pathogens, water suppliers often add disinfectants, such as chlorine to drinking water. Disinfection byproducts are formed during the treatment of drinking water when disinfectants react with naturally-occurring organic and inorganic matter present in the water. Certain disinfection byproducts, including some TTHMs, and some HAA5s, have been shown to cause cancer in laboratory animals. Other disinfection byproducts have been shown to affect the liver and the nervous system, and cause reproductive or developmental effects in laboratory animals. Exposure to certain disinfection byproducts may produce similar effects in people. Therefore, the Division of Drinking Water has set standards to limit exposure to TTHM and HAA5 chemicals.

#### What should I do?

There is nothing you need to do at this time.

#### For more information please contact:

Scott Sealander, Shasta County Public Works (530) 225-5571

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*This notice is being provided to you by Shasta County Service Area No. 2 - Sugarloaf in compliance with the California Code of Regulations as a means of keeping the public informed.*

**COMPLIANCE CERTIFICATION**Citation Number: **01-02-15(C)-011**Name of Water System: **Shasta County Service Area No. 2 - Sugarloaf**System Number: **4500006**

As required by Section 116450 of the California Health and Safety Code, I certify that the users of the water supplied by this water system were notified of the violations of Title 22, California Code of Regulations (CCR) for the compliance period of 2014/2015. In addition, I certify that the Shasta County Service Area No. 2 - Sugarloaf complied with the directives of this citation as indicated below:

<u>Required Action</u>	<u>Date Completed</u>
Public Notification, as required by Directive 2(a)	_____
Public Notification, as required by Directive 2(b)	_____
_____	_____
Signature of Water System Representative	Date

Attach a copy of the direct delivery notice, and a copy of the notice published in the newspaper.

**THIS FORM MUST BE COMPLETED AND RETURNED TO THE DEPARTMENT NO LATER THAN OCTOBER 10, 2015**

**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 order 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.