



EDMUND G. BROWN JR.  
GOVERNOR



MATTHEW RODRIGUEZ  
SECRETARY FOR  
ENVIRONMENTAL PROTECTION

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

November 19, 2015

System No. 4500317

Certified Mail  
7012 3460 0003 1113 2028

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

Attn: Patrick Minturn, Director of Public Works

TRANSMITTAL OF CITATION NO. 01-02-15(C)-018

The State Water Resources Control Board Division of Drinking Water has issued the Shasta County Service Area No. 11 – French Gulch 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, appearing to read "Michael J. McNamara".

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

cc: Richard Hinrichs, Northern California Section Chief, DDW

Enclosures: Citation No. 01-02-15(C)-018

KEC\4500317 Shasta CSA No. 11 – French Gulch \ File: Enforcement

FELICIA MARCUS, CHAIR | THOMAS HOWARD, EXECUTIVE DIRECTOR

364 Knollcrest Drive, Suite 101, Redding, CA 96002 | [www.waterboards.ca.gov](http://www.waterboards.ca.gov)

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

**TO:** Shasta County Service Area No.11 – French Gulch  
1855 Placer Street  
Redding, CA 96001

**Attn:** Patrick Minturn, Director of Public Works

**CITATION FOR VIOLATION OF CALIFORNIA CODE OF REGULATIONS,**  
**TITLE 22, SECTION 64534.2, 64534.8, and 64535.2**  
**WATER SYSTEM NO. 4500317**  
**CITATION NO. 01-02-15(C)018**  
**Issued on November 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. 11 – French Gulch (hereinafter, "CSA"), located west of

1 Redding, for violation of California Code of Regulations (CCR), Title 22, Sections  
2 64534.2 (d) (1), 64534.8 (a) and (e), and 64535.2 (e) (1), (3), and (4).

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4 **APPLICABLE AUTHORITIES**

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

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

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

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

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

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25 (e) The Division may assess a penalty in an amount not to exceed one  
26 thousand dollars (\$1,000) per day for each day that a violation occurred,

1 and for each day that a violation continues to occur. A separate penalty  
2 may be assessed for each violation.  
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4 **California Code of Regulations, Title 22, Section 64534, subsections (f) and (g)**  
5 **provides in relevant part:**

6 (f) Systems that fail to monitor shall be in violation of the monitoring  
7 requirements for the entire monitoring period that a monitoring result would  
8 be used in calculating compliance with MCLs or MRDLs, and shall notify the  
9 public pursuant to sections 64463, 64463.7, and 64465, in addition to  
10 reporting to the State Board pursuant to sections 64537 through 64537.6.  
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12 (g) Systems that fail to monitor in accordance with the monitoring plan required  
13 by section 64534.8 shall be in violation of the monitoring requirements, and  
14 shall notify the public pursuant to sections 64463, 64463.7, and 64465, in  
15 addition to reporting to the Department pursuant to sections 64537 through  
16 64537.6.  
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18 **California Code of Regulations, Title 22, Section 64534.2, subsection (d) (1)**  
19 **provides in relevant part:**

20 (d) (1) By the applicable date specified in section 64530(d), and in lieu of  
21 TTHM and HAA5 monitoring in subsection (a): Community and non-  
22 transient non-community water systems shall monitor for TTHM and HAA5  
23 at frequencies and location totals indicated in table 64534.2-C and in  
24 accordance with the monitoring plan developed pursuant to section  
25 64534.8;  
26

<i>Source Water Type</i>	<i>Persons Served</i>	<i>Number of Distribution System Monitoring Locations</i>	<i>Monitoring Period</i>
Approved surface water	<500	1 TTHM and 1 HAA5 sample: one at the location with the highest TTHM measurement, one at the location with the highest HAA5 measurement	Quarterly (unless approved for reduced frequency)

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**California Code of Regulations, Title 22, Section 64534.8, subsections (a) and (e) provide in relevant part:**

- (a) A system shall develop and submit to the State Board a monitoring plan. The system shall implement the plan after State Board review and approval. The system shall maintain the plan and make it available for inspection by the general public no later than 30 days following the applicable compliance date in sections 64530 (a) or (b), and (d).
  
- (e) The plan developed for compliance monitoring pursuant to section 64534.2(d) may be revised to reflect changes in treatment, distribution system operations and layout (including new service areas), or other factors that may affect TTHM or HAA5 formation, or for State Board –approved reasons, after consultation with the State Board regarding the need for changes and the appropriateness of changes. Systems shall comply with the requirements of subsection (a) for the revised plan. If monitoring locations are changed, systems shall replace existing compliance monitoring locations having the lowest LRAA with new locations that reflect the current distribution system locations having expected high TTHM or HAA5 levels.

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**California Code of Regulations, Title 22, Section 64535.2, subsections (e) (1) (3) and (4) provide in relevant part:**

(e) TTHM and HAA5 MCL compliance, as monitored pursuant to section 64534.2(d), shall be determined as follows:

- (1) For systems monitoring quarterly, each locational running annual average (LRAA), computed quarterly, shall not exceed the MCLs specified in section 64533;
- (3) If a system fails to complete four consecutive quarters of monitoring, compliance with the MCL for the last four-quarter compliance period shall be based on an average of the available data. If more than one sample per quarter is taken at a monitoring location, all the samples taken in the quarter at that monitoring location shall be averaged to determine a quarterly average to be used in the LRAA calculation; and
- (4) If the LRAA exceeds the MCL, calculated based on four consecutive quarters of monitoring (or the LRAA calculated based on fewer than four quarters of data if the MCL would be exceeded regardless of the monitoring results of subsequent quarters), the system is in violation of the MCL and shall notify the public pursuant to sections 64463, 64463.4, and 64465, including the language in appendix 64465-G, in addition to reporting to the State Board pursuant to sections 64537 through 64537.6.



1 **STATEMENT OF FACTS**

2 The Shasta County Department of Public Works operates the CSA to serve the  
3 community of French Gulch, located just west of the City of Redding. There are 82  
4 service connections that serve a population of 185. The water system includes a  
5 surface water treatment facility that typically operates year round. Surface water is  
6 treated with chlorine disinfectant, polymer coagulant, and aluminum coagulant prior to  
7 clarification and filtration. Finished water is stored in a 350,000-gallon steel tank.

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9 The CSA is required to monitor total trihalomethanes (TTHMs) and Haloacetic acids  
10 (HAA5s) quarterly at locations in the distribution system with the highest TTHM and  
11 the highest HAA5 measurements, in accordance with an approved monitoring  
12 program. Quarterly monitoring is required for systems that have not met the reduced  
13 monitoring requirements for TTHMs and HAA5s. The CSA has been routinely  
14 monitoring these contaminants at four monitoring locations (Tailings Street, French  
15 Gulch Road, Trinity Mountain Road, and Cline Gulch); however the CSA has failed to  
16 collect four consecutive quarterly samples at any of these locations. The  
17 concentration of HAA5s has exceeded the MCL of 60 µg/L at times in each of the four  
18 monitoring locations, and concentrations of TTHMs has exceeded the MCL of 80 µg/L  
19 at two of the monitoring locations (Tailings Street and French Gulch Road) on one  
20 occasion, as shown in Table 1. MCL compliance is determined based on the  
21 available data. The CSA is also required to submit a disinfection byproduct  
22 monitoring plan to the State Board and implement the plan after State Board review  
23 and approval. No such plan has been submitted.

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**Table 1. Disinfection Byproduct Monitoring Results**

Date	Tailings Street		French Gulch Road		Trinity Mountain Road		Cline Gulch	
	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
3/6/2015					49.8	29.5	45.0	28.4
5/15/2015					40.3	33.6		
5/15/2015					44.3	27.3		
8/21/2015					66.7	59.4	66.1	54.0
12/2/2014	<b>96.3</b>	<b>162</b>	<b>98.4</b>	<b>167</b>				
8/18/2014					71.9	34.4	77.6	4.5
6/6/2014					51.3	ND		
6/6/2014					35.7	50.5		
2/19/2014					62.7	<b>114</b>	64.9	<b>89.3</b>
11/21/2013	51.9	<b>99.7</b>	50	<b>98.9</b>				
8/15/2013					59.8	35.3	61.7	34.6
5/28/2013					38	32.5		
2/26/2013					18.7	25.3	18.8	19.8
12/19/2012	60.5	<b>94.4</b>	59.3	<b>95.4</b>				
8/17/2012					50	44.6	48.7	41.4
5/30/2012					29.9	43.5		
5/30/2012					27.6	42.3		
2/28/2012					46.4	<b>73.8</b>	52.2	<b>86.8</b>

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Note: All results shown in units of µg/L

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**DETERMINATION**

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The Division has determined that the CSA violated Section 64534.2, 64534.8, and 64535.2, Title 22 of the CCR, in that the CSA has exceeded the MCL for HAA5s, and has failed to submit a disinfection byproduct compliance monitoring plan to the State Board and implement the plan after State Board review and approval.

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**DIRECTIVES**

The CSA is hereby directed to take the following actions:

1. The CSA shall submit to the Division, by **December 31, 2015**, a Corrective Action Plan to achieve compliance with the relevant sections of the California Code of Regulations, described in the findings above.
2. Submit a Disinfection Byproduct Monitoring Plan by **December 15, 2015**.
3. Within 30 days of the issuance of this Citation but in no case later than **December 20, 2015**, notify all persons served by the CSA of the monitoring violation as required by Section 64463, 64463.7 and Section 64465, Title 22, of the CCR. Notification shall be completed by mail or direct delivery of the notice contained in Attachment 'A' to each customer. Changes and/or modifications to Attachment 'A' shall not be made unless approved by the division.
4. Complete and return Attachment 'B' entitled "Compliance Certification" by **December 31, 2015**. A copy of the notices used to provide public notification shall be attached to the form.
5. The CSA shall initiate quarterly monitoring of disinfection byproducts by no later than **December 31, 2015**, in accordance with an approved disinfection byproduct monitoring plan.



1 All documents required by this Citation shall be submitted to the Division to the  
2 following address:

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Michael J. McNamara, P. E.  
Lassen District Engineer  
State Water Resources Control Board  
Division of Drinking Water  
364 Knollcrest Drive, Suite 101  
Redding, CA 96002  
(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.

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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.

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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.

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**PARTIES BOUND**

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

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**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 a 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 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 an order of the Board. The Board does not waive any further enforcement action by issuance of this citation.

November 19, 2015  
Date

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

Attachments:

- 'A' Public Notification: Disinfection Byproducts above the Drinking Water Standard and Monitoring Requirements not met for Shasta County Service Area #11 – French Gulch
- '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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### Disinfection Byproducts above the Drinking Water Standard and Monitoring Requirements not met for Shasta County Service Area #11 – French Gulch (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 where the highest levels of TTHMs and HAA5s are measured. TTHMs and HAA5s are chlorine disinfection byproducts. The CSA has conducted routine monitoring for these contaminants in the distribution system at four monitoring locations; however the CSA has failed to collect a complete series of quarterly samples at any of these locations. In addition, concentrations of HAA5s have exceeded the Maximum Contaminant Level at two locations in the distribution system. The CSA will work 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. The CSA is also required to develop a corrective action plan to ensure that TTHMs and HAA5s do not exceed drinking water standards.

#### 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 highest historical results for each contaminant

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:

Troy Bartolomei, Shasta County Public Works (530) 225-5571

**COMPLIANCE CERTIFICATION**Citation Number: **01-02-15(C)-018**Name of Water System: **Shasta County Service Area No. 11 – French Gulch**System Number: **4500317**

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. 11 – French Gulch complied with the directives of this citation as indicated below:

<u>Required Action</u>	<u>Date Completed</u>
Public Notification, as required by Directive 3	_____
_____	_____
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 DECEMBER 31, 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.