

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

November 18, 2015

Certified Mail  
7012 3460 0003 1113 2066

Patrick Minturn, Director of Public Works  
Shasta CSA #3, Castella  
1855 Placer Street  
Redding, CA 96001

TRANSMITTAL OF CITATION NO. 01-02-15C-020

Dear Mr. Minturn,

The State Water Resources Control Board (Water Board), Division of Drinking Water, has issued the Shasta County Service Area #3 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.

Sincerely,

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 L. Hinrichs, Chief, Northern California Section

Enclosure

sww \ 4500015 Shasta CSA#3 \ 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**  
**WATER RESOURCES CONTROL BOARD**  
**DIVISION OF DRINKING WATER**

**TO:** Shasta CSD – Castella, #3  
1855 Placer Street  
Redding, CA 96001

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

**CITATION FOR VIOLATION OF**  
**CALIFORNIA CODE OF REGULATIONS, TITLE 22,**  
**SECTIONS 64653, 64663, 64664, 64463.1**

**WATER SYSTEM NO. 4500015**  
**CITATION NO. 01-02-15C-020**  
**Issued on November 18, 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 #3,

1 California Code of Regulations (CCR), Title 22, Sections 64653, 64663, 64664 and Section  
2 64463.1.

3 **APPLICABLE AUTHORITIES**

4  
5 **Section 116650 of California Health and Safety Code provides:**

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

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

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

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

20 (e) The department may assess a penalty in an amount not to exceed one  
21 thousand dollars (\$1,000) per day for each day that a violation occurred, and for each day that a  
22 violation continues to occur. A separate penalty may be assessed for each violation.

23  
24 **Section 64653 of the California Code of Regulations, Title 22, provides in relevant part:**

25 (c) A supplier shall comply with the combined filter effluent turbidity performance  
26 standards in table 64653 for each treatment plant while the plant is in operation:



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(2) Conventional or direct filtration treatment and serves fewer than 10,000 persons

(B) Shall not exceed 1 NTU for more than one continuous hour;

(C) Shall not exceed 1 NTU at four-hour intervals; and

(D) Shall not exceed 1.0 NTU for more than eight consecutive hours.

**Section 64663 of the California Code of Regulations, Title 22, provides in relevant part:**

A supplier shall notify the Department as soon as possible, but no later than by the end of the next business day, or within 24 hours, whichever is less, by telephone or other equally rapid means whenever:

(a) A combined filter effluent turbidity exceedance occurs pursuant to table 64663:

(3) Conventional or direct filtration treatment and serves fewer than 10,000 persons

(B) For a supplier using a continuous monitoring program:

(1) Exceeds 1 NTU for more than one continuous hour; or

(2) Exceeds 1 NTU at four-hour intervals; or exceeds 1.0 NTU for more than eight consecutive hours.

**Section 64664 of the California Code of Regulations, Title 22, provides in relevant part:**

(a) For each calendar month, a supplier shall submit a report to the Department by the tenth day of the following month that includes the applicable information in this section for each treatment plant. The report shall be signed by the chief water treatment plant operator, plant superintendent, or other person directly responsible for the operation of the water treatment plant.

(e) The report shall include a written explanation of the cause of any violation of performance standards specified in sections 64653 or 64654 and operating criteria specified in section 64660(b)(9).

1 **Section 64463.1 of the California Code of Regulations, Title 22, provides in relevant part:**

2  
3 (a) A water system shall give public notice pursuant to this section and section 64465 if any  
4 of the following occurs:

5 (3) Violation of a Chapter 17 treatment technique requirement resulting from a  
6 single exceedance of a maximum allowable turbidity level if:

7 (A) The Department determines after consultation with the water system  
8 and a review of the data that a Tier 1 public notice is required; or

9 (B) The consultation between the Department and the water system does  
10 not take place within 24 hours after the water system learns of the  
11 violation;

12  
13  
14 **STATEMENT OF FACTS**

15  
16 The CSA #3 operates a community water system which serves a population of approximately  
17 252 people through 90 service connections. The water system includes a surface water  
18 treatment plant which receives water from Castle Creek. The treatment system consists of  
19 pipeline flocculation, multi-media sand filtration, and disinfection with sodium hypochlorite. The  
20 treatment system is classified as direct filtration. The treated water is delivered to the  
21 distribution system, where a 200,000-gallon capacity storage tank maintains pressure on the  
22 system. Regulatory oversight of the CSA #3 transferred to the Division on January 1, 2014.

23  
24 The Division received the monthly treatment records for September 2015, from the CSA #3 on  
25 October 14, 2015. These records report the combined filter effluent (CFE) turbidity values  
26 measured every 4-hours, as required by the regulations. These records indicated that the CFE  
27 turbidity on September 28, 2015, during the period 4:00pm to 8:00pm was 1.8-NTU; and the

1 CFE turbidity on September 28, 2015, during the period 8:00pm to Midnight was 1.64-NTU.  
2 These treatment records also indicate that the CFE turbidity on September 28, 2015, had been  
3 greater than 1-NTU for more than 1 hour and greater than 1.0-NTU for more than 8 consecutive  
4 hours while the plant was operating. The monthly treatment record also indicates that an  
5 operator visited the treatment plant at noon on September 28, 2015. The treatment record also  
6 indicates that both the inline and bench-top turbidimeters were calibrated on  
7 September 9, 2015.

8  
9 The Division was not notified by CSA #3 of the high turbidity incident as required by Section  
10 64663, CCR, Title 22 and only learned of the violation by reviewing the monthly report. In  
11 addition, the monthly report did not include a written explanation of the cause of the high  
12 turbidity values as required by Section 64664(e), CCR, Title 22.

13  
14 On October 26, 2015, Division staff contacted CSA #3 staff to investigate the cause of the high  
15 turbidity measurements. The CSA #3 indicated that the turbidity alarm had been disabled on  
16 September 9, 2015, in order to calibrate the turbidimeter, and was not enabled after calibration.  
17 Therefore, the alarm and controls, which are set to shut down the plant if the CFE turbidity goes  
18 above 0.3-NTU, did not function. CSA #3 staff could give the Division no further explanation as  
19 to why the turbidity spiked for such a long period of time or why the turbidity came back into  
20 compliance without any apparent operator intervention.

21  
22 Division staff requested the CSA #3 submit chart recorder records of the continuous turbidity  
23 measurement of the CFE for September 28, 2015. These records indicate that at approximately  
24 12:20pm on September 28, 2015, the turbidity of the combined filter effluent (CFE) increased  
25 rapidly from 0.14-NTU to greater than 2.0-NTU. The turbidity of the CFE was above 2.0-NTU  
26 for nine hours until approximately 9:20pm. Between 9:30pm on September 28, 2015, and  
27 12:30am on September 29, 2015, the turbidity of the CFE varied between 1.4-NTU and greater

1 than 2.0-NTU. At 12:30am on September 29, 2015, the CFE turbidity started decreasing, and  
2 steadily decreased to below 0.3-NTU by 2:45am on September 29, 2015. By 7:00am on  
3 September 29, 2015, the CFE turbidity was at the lowest limit possible for measurement,  
4 0.01-NTU.

#### 5 DETERMINATIONS

6  
7 The Division has determined that the CSA #3 violated the following sections of the California  
8 Code of Regulations, Title 22 during September 2015:

9 (1) Section 64653(c)(2)(B) in that the turbidity of the combined filter effluent exceeded  
10 1-NTU for more than one continuous hour.

11 (2) Section 64653(c)(2)(C) in that the turbidity of the combined filter effluent exceeded  
12 1-NTU at four hour intervals.

13 (3) Section 64653(c)(2)(D) in that the turbidity of the combined filter effluent exceeded  
14 1.0-NTU for more than eight consecutive hours.

15 (4) Section 64663 in that the CSA #3 failed to notify the Division within 24 hours of the  
16 combined filter effluent turbidity exceedances.

17 (5) Section 64664(e) in that the CSA #3 failed to provide a written explanation of the  
18 combined filter effluent turbidity performance standard violation in the monthly report.

19 (6) Section 64463.1 (a)(3)(B) in that the CSA #3 did not consult with the Division and did not  
20 issue a Tier 1 public notice to its customers within 24 hours of learning of the event.

#### 21 22 ADMINISTRATIVE PENALTY

23  
24 Sections 116650(d) and 116650(e) of the California Health and Safety Code allow for the  
25 assessment of a penalty for failure to comply with requirements of the California SDWA. For  
26 failure to comply with Sections 64663 and 64463.1 of the California Code of Regulations, Title



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22, the Division hereby assesses CSA #3 a penalty in the amount of \$1,000.00. Directions for paying this penalty are included in Directive No. 5 of this Citation.

**DIRECTIVES**

The CSA #3 is hereby directed to take the following actions:

1. Comply with Sections 64653 and 64463.1 of the California Code of Regulations, Title 22, during all future monthly monitoring periods.
2. Submit for Division approval by **December 31, 2015**, a Corrective Action Plan identifying the likely causes of the CFE turbidity violation and the changes to be implemented by the CSA #3 in order to correct the cause of the CFE turbidity violation and ensure that the CSA #3 reliably delivers water to consumers that meets drinking water standards. At a minimum the following shall be addressed: water treatment plant reliability, certified operator oversight, operator training, notification of exceedances to the Division, and recommended changes to the CSA #3 Operations Plan.
3. Submit for Division approval by **January 31, 2016**, an updated Operations Plan which includes the recommendations from the Corrective Action Plan and: establishes a schedule by which a certified operator will inspect the treatment plant on a minimum weekly basis; clearly identifies certified operator and day operator roles and responsibilities; clearly identifies when and how day operators should respond to plant upset conditions; clearly defines what constitutes a plant upset condition; establishes policy and procedures for daily plant reporting to the Chief Operator; and establishes policy and procedures for turbidimeter calibrations.

1 4. Within 30 days of the issuance of this Citation, but in no case later than  
2 **December 31, 2015**, notify all persons served by the CSA #3 of the surface water  
3 treatment violation as required by Section 64463.4 and Section 64465, Title 22, of the  
4 CCR. Notification shall be completed in accordance with each of the following:

5 a. Mail or direct delivery of the notice contained in Attachment 'A' to each customer  
6 receiving a bill including those that provide their drinking water to others (e.g.,  
7 schools or school systems, apartment building owners, or large private employers),  
8 and other service connections to which water is delivered by the Company.

9 b. Provide the notice contained in Attachment 'A' by publication in a local  
10 newspaper to reach persons not likely to be reached by a mailing or direct delivery:  
11 Changes and/or modifications to Attachment 'A' shall not be made unless approved  
12 by the Division.

13  
14 5. Submit to the Division by no later than **December 11, 2015**, a check for the penalty of  
15 \$1,000.00 imposed by this Citation. The citation number shall be written on the check.  
16 The check shall be made payable to the **California Division of Drinking Water – Safe**  
17 **Drinking Water Account** and mailed to the Board along with Attachment 'C' entitled  
18 "Notice of Citation Issuance." Payment shall be submitted to the Board at the address  
19 given in Attachment 'C.'

20  
21 6. Complete and return by no later than **January 10, 2016** Attachment 'B' entitled  
22 "Compliance Certification".

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24 Unless otherwise noted, all documents required under this Citation shall be submitted to the  
25 Board at the following address:



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

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 CSA #3.

Nothing in this Citation relieves the CSA #3 of its obligation to meet the requirements of the California SDWA 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.

**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 regulation, permit, standard, citation, 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 or violates an order of the Board. The Board does not waive any further enforcement action by issuance of this citation.

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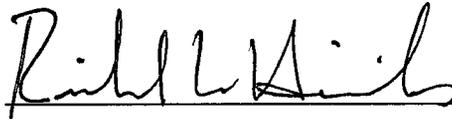
**PARTIES BOUND**

This Citation shall apply to and be binding upon the CSA #3, its officers, directors, shareholders, agents, employees, contractors, successors, and assignees.

**SEVERABILITY**

The Directives of this Citation are severable, and the CSA #3 shall comply with each and every provision thereof, notwithstanding the effectiveness of any other provision.

11/18/2015



Date

Richard L. Hinrichs, P.E., Chief

Northern California Section

Division of Drinking Water

State Water Resources Control Board



Attachments:

'A' Notice of Citation Issuance

'B' Compliance Certification

'C' Notice of Citation Issuance

CERTIFIED MAIL 7012 3460 0003 1113 2066

## **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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### **Shasta CSA #3, Castella Did Not Meet Surface Water Treatment Requirements.**

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Our water system recently violated a drinking water standard. As our customers, you have a right to know what happened, what you should do, and what we did to correct this situation. We routinely monitor your water for turbidity (cloudiness). This tells us whether we are effectively filtering the water supply. Normal turbidity levels at our treatment plant are 0.1 turbidity units. On September 28, 2015, turbidity measurements showed levels of greater than 2 turbidity units for more than 8 hours. This was above the standard of 1 unit for no more than one hour. Because of these high levels of turbidity, there is an increased chance that the water may have contain disease-causing organisms.

#### **What Should You Do?**

- You do not need to boil your water or take other actions at this time. We do not know of any contamination, and none of our testing has shown disease-causing organisms in the drinking water.
- 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 EPA's Safe Drinking Water Hotline at 1 (800) 426-4791.

#### **What does this mean?**

Turbidity has no health effects. However, turbidity can interfere with disinfection and provide a medium for microbial growth. Turbidity may indicate the presence of disease causing organisms. These organisms include bacteria, viruses, and parasites which can cause symptoms such as nausea, cramps, diarrhea, and associated headaches. These symptoms are not caused only by organisms in drinking water. If you experience any of these symptoms and they persist, you may want to seek medical advice.

#### **What Happened? What Was Done?**

Treatment plant records show that at approximately 12:20pm on September 28, 2015, the turbidity of the water sent to the distribution system increased rapidly from approximately 0.14 turbidity units, to greater than 2 turbidity units. The alarm system which automatically shuts down the treatment plant when turbidity levels are too high did not engage. Therefore, it appears that high turbidity water continued to be delivered to the distribution system until approximately 2:45am on September 29, 2015, when the turbidity level was again within regulatory standards. We have been unable to determine the cause of the violation, but we are taking steps to ensure that our alarm systems are properly maintained and functional.

For more information, please contact Troy Bartolomei at (530) 225-5661.

*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 notice in a public place or distributing copies by hand or mail.*

This notice is being sent to you by the Shasta County Service Area #3.

### COMPLIANCE CERTIFICATION

Citation Number: **01-02-15C-020**

Name of Water System: **Shasta CSA #3, Castella**

System Number: **4500015**

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 September 2015. In addition, I certify that the Shasta CSA #3, Castella complied with the directives of this citation as indicated below:

<u>Required Action</u>	<u>Date Completed</u>
Corrective Action Plan submittal as required by Directive 2	_____
Operations Plan submittal as required by Directive 3	_____
Public Notification, as required by Directive 4(a)	_____
Public Notification, as required by Directive 4(b)	_____
Payment of \$1,000.00 Administrative Penalty to the Division of Drinking Water in Sacramento, as required by Directive 5	_____
_____	_____
Signature of Water System Representative	Date

**Attach a copy of the direct delivery notice, a copy of the notice published in the newspaper, and a copy of the check for payment of the administrative penalty.**

**THIS FORM MUST BE COMPLETED AND RETURNED TO THE DEPARTMENT NO LATER THAN January 10, 2016.**

**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.

STATE OF CALIFORNIA  
Division of Drinking Water  
State Water Resources Control Board

**Notice of Citation Issuance**

System Name: \_\_\_\_\_ Shasta CSA #3, Castella \_\_\_\_\_

System Number: \_\_\_\_\_ 4500015 \_\_\_\_\_

**Background Statement**

During the month of November 2015, the Division of Drinking Water issued Citation Number 01-02-15C-020 to the Shasta CSA #3, Castella. The citation carried an administrative penalty in the amount of \$1,000.00

**Method of Payment**

A check for the total amount of the administrative penalty and a copy of this form shall be submitted to the Division by **December 11, 2015**. The citation number shall be written on the check. The check shall be made payable to the California Division of Drinking Water Safe Drinking Water Account and submitted to:

SWRCB Accounting Office  
Attn: Drinking Water Program  
PO Box 1888  
Sacramento, CA 95812-1888

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Please attach check below: