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SECRETARY FOR  
ENVIRONMENTAL PROTECTION

**State Water Resources Control Board**

Division of Drinking Water

June 8, 2016

Water System No. 4901095

Tony Fry  
Westminster Woods Camp  
6510 Bohemian Highway  
Occidental, CA 95465

**CITATION NO. 02\_18\_16C\_023  
LEAD AND COPPER MONITORING AND REPORTING VIOLATION**

Enclosed is a Citation issued to the Westminster Woods Camp (System) public water system.

Westminster Woods Camp will be billed at the State Water Resources Control Board Division of Drinking Water's (Division) hourly rate (currently estimated at \$153.00) for the time spent on issuing this Citation. Health and Safety Code Section 116577 provides that a public water system must reimburse the Division for actual costs incurred by the Division for specified enforcement actions, including, but not limited to, preparing, issuing, and monitoring compliance with a citation. At this time, the Division has spent approximately one hour on enforcement activities associated with this violation.

Westminster Woods Camp will receive a bill sent from our Division of Drinking Water Fee Billing Unit in August of the next fiscal year. This bill will contain fees for any enforcement time spent on Westminster Woods Camp for the current fiscal year.

If you have any questions regarding this matter, please contact George Chien of my staff at (707) 576-2971 or me at (707) 576-2006.

Sincerely,

Janice M. Thomas, P.E., Sonoma District Engineer  
Division of Drinking Water  
STATE WATER RESOURCES CONTROL BOARD

Enclosure: Citation No. 02\_18\_16C\_023

C: Chris Rhodes, 6510 Bohemian Highway, Occidental, CA 95465  
David Dyslin, Operator, 6510 Bohemian Highway, Occidental, CA 95465

FELICIA MARCUS, CHAIR | THOMAS HOWARD, EXECUTIVE DIRECTOR

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STATE OF CALIFORNIA  
WATER RESOURCES CONTROL BOARD  
DIVISION OF DRINKING WATER

**Name of Public Water System:** Westminster Woods Camp

**Water System No:** 4901095

**To:** Tony Fry  
6510 Bohemian Highway  
Occidental, CA 95465

**Physical Location:** 6510 Bohemian Highway,  
Occidental, California 95465

**Issued:** June 8, 2016

**CITATION FOR NONCOMPLIANCE  
WITH LEAD AND COPPER MONITORING AND REPORTING VIOLATION**

The Division of Drinking Water of the State of California Water Resources Control Board (Division) hereby issues a citation to the Westminster Woods Camp (hereinafter System) for failure to comply Section 64675, Title 22 of the California Code of Regulations (CCR).

Section 116650 of the California Health and Safety Code (CHSC), authorizes the issuance of a citation for failure to comply with a requirement of California Safe Drinking Water Act (CHSC, Division 104, Part 12, Chapter

1 4, commencing with Section 116270), or any regulation, standard, permit or  
2 order issued thereunder. A copy of the *Applicable Statutes and Regulations*  
3 is located in Appendix 1, which is attached hereto and incorporated by  
4 reference.  
5

6  
7 **STATEMENT OF FACTS**

8 Westminster Woods Camp is classified as a nontransient-noncommunity  
9 water system with 20 connections serving an approximate population of 53.  
10 The System was conducting lead and copper tap monitoring on a frequency  
11 of once every three years and last conducted lead and copper tap  
12 monitoring in June 2011. In a letter dated September 2, 2011, the Division  
13 instructed the System to continue monitoring by collecting five lead and  
14 copper tap samples during June, July, August, or September 2014. The  
15 Division did not receive results from 2014. Division staff sent emails dated  
16 October 29 and November 3, 2015 requesting the System submit the 2014  
17 sampling results or conduct the lead and copper tap monitoring in November  
18 2015. During the week of March 9, 2016, the Division staff had been notified  
19 by Mr. Tony Fry that the System had not conducted lead and copper tap  
20 sampling since 2011.  
21  
22

23  
24 As of the date of this Citation, the Division has not received results for the  
25 lead and copper tap samples collected either in 2014 or 2015.  
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**DETERMINATION**

The Division has determined that the System is in violation of Title 22, CCR, Section 64675. Section 64675 defines the tap sampling monitoring period.

The System was conducting lead and copper tap monitoring on a frequency of once every three years and last conducted the monitoring in 2011. The System failed to follow the monitoring frequency and did not conduct the monitoring during the period directed by the Division. Therefore, the System violated the monitoring and reporting requirements contained in Section 64675.

**DIRECTIVES**

Westminster Woods Camp is hereby directed to take the following actions:

1. Comply with Section 64675, Title 22, CCR in all future monitoring periods.
2. The System must conduct lead and copper tap monitoring by collecting five tap samples in **June 2016**.
3. Submit a completed lead and copper results worksheet with a copy of laboratory report to the Division within 30 days of sampling.



- 1       4. On or before **July 8, 2016**, notify all persons served by the System of  
2       the monitoring and reporting violation in conformance with Title 22,  
3       Sections 64463.7 and 64465. Appendix 2: Public Notification  
4       Template may be used to fulfill this directive.  
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- 6
- 7       5. Pursuant to Section 64463.7(d), the System may notify all persons  
8       served by the System by distributing the 2015 Consumer Confidence  
9       Report that contains Appendix 2: Public Notification Template, if the  
10      Consumer Confidence Report is delivered to system customers by  
11      July 1, 2016.  
12
- 13
- 14      6. The System shall complete Appendix 3: Compliance Certification.  
15      Submit it with a copy of the public notification to the Division on or  
16      before **July 22, 2016**.
- 17

18      The Division reserves the right to make such modifications to this Citation,  
19      as it may deem necessary to protect public health and safety. Such  
20      modifications may be issued as amendments to this Citation and shall be  
21      effective upon issuance.  
22

23

24      Nothing in this Citation relieves the System of its obligation to meet the  
25      requirements of the California Safe Drinking Water Act (CHSC, Division 104,  
26      Part 12, Chapter 4, commencing with Section 116270), or any regulation,  
27      standard, permit or order issued thereunder.



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All submittals required by this Citation shall be submitted to the Division at the following address: Janice M. Thomas, P.E.  
State Water Resources Control Board  
Division of Drinking Water  
50 D Street, Suite 200  
Santa Rosa, CA 95404

**PARTIES BOUND**

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

**SEVERABILITY**

The directives of this Citation are severable, and the System shall comply with each provision thereof notwithstanding the effectiveness of any provision.

**FURTHER ENFORCEMENT ACTION**

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Division 104, Part 12, Chapter 4, (commencing with Section 116270) of the California Health and Safety Code authorizes the Division to: issue additional citations with assessment of penalties if the System continues to fail to correct a violation identified in a citation; 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 orders of the Division; and petition the superior court to take various enforcement measures against a public water system that has failed to comply with orders of the Division. The Division does not waive any further enforcement action by issuance of this citation.

Janice M. Thomas                      June 8, 2016  
Janice M. Thomas, P.E., Sonoma District Engineer                      Date  
Division of Drinking Water  
STATE WATER RESOURCES CONTROL BOARD

- Appendices (3):
- 1. Applicable Statutes and Regulations
  - 2. Public Notification Template
  - 3. Compliance Certification



Certified Mail No. 70141200000111677464

4901095/Compliance  
02\_18\_16C\_023\_4901095\_52/GC

**APPENDIX 1. APPLICABLE STATUTES AND REGULATIONS  
FOR CITATION NO. 02\_18\_16C\_023**

Section 116650 of the CHSC states in relevant part:

- (a) If the department 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 department 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 department 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.

California Code of Regulations (CCR), Section 64675 states in relevant part:

- (a) During each period, each system shall conduct standard tap sampling by collecting one sample from the number of sites based on the number of people served specified in table 64675-A under Standard Tap Sampling.
- (b) During each period, each system conducting reduced tap sampling shall collect at least one sample from the number of sites based on the number of people served specified in table 64675-A under Reduced Tap Sampling, as follows:
  - (1) The sites shall be representative of the sites required for standard tap sampling.
  - (2) The samples shall be collected during the months of June, July, August, or September, unless the Department approves an alternate set of four months based on a review of the system's operations and lead and copper data, in which case the system shall initiate sampling during the alternate set of four months when directed in writing to do so by the Department, as follows:
    - (A) No later than 21 months after the previous period, if sampling annually, or
    - (B) No later than 45 months after the previous period, if sampling triennially.

**Table 64675-A**

**Lead and Copper Tap Sampling Sites**

System Size	Standard Tap Sampling	Reduced Tap Sampling
	(Minimum Number of Sites)	
<101	5	5

California Code of Regulations (CCR), Section 64463.7 states in relevant part:

- (a) Each water system shall give public notice pursuant to this section if any of the following occurs:
  - (1) Monitoring violations;

(b) Each water system shall give the public notice within one year after it learns of the violation or begins operating under a variance or exemption.

- (1) The water system shall repeat the public notice annually for as long as the violation, variance, exemption, or other occurrence continues.
- (2) Posted public notices shall remain in place for as long as the violation, variance, exemption, or other occurrence continues, but in no case less than seven days.
- (3) Instead of individual Tier 3 public notices, a water system may use an annual report detailing all violations and occurrences for the previous twelve months, as long as the water system meets the frequency requirements specified in this subsection.

(c) Each water system shall deliver the notice in a manner designed to reach persons served within the required time period, as follows:

(2) Unless otherwise directed by the State Board in writing based on its assessment of the violation or occurrence and the potential for adverse effects on public health and welfare, noncommunity water systems shall give the public notice by:

- (A) Posting in conspicuous locations throughout the area served by the water system; and
- (B) Using one or more of the following methods to reach persons not likely to be reached by a posting:
  1. Publication in a local newspaper or newsletter distributed to customers;
  2. E-mail message to employees or students;
  3. Posting on the Internet or intranet; or
  4. Direct delivery to each customer.

(d) Community and nontransient-noncommunity water systems may use the Consumer Confidence Report pursuant to sections 64480 through 64483, to meet the initial and repeat Tier 3 public notice requirements in subsection 64463.7(b), as long as the Report meets the following:

- (1) Is given no later than one year after the water system learns of the violation or occurrence;
- (2) Includes the content specified in section 64465; and
- (3) Is distributed pursuant to paragraph (b)(1) and (2) or subsection (c).

California Code of Regulations (CCR), Section 64465 states in relevant part:

(c) A public water system providing notice pursuant to this article shall comply with the following multilingual-related requirements:

- (2) For a Tier 2 or Tier 3 public notice:
  - (A) The notice shall contain information in Spanish regarding the importance of the notice, or contain a telephone number or address where Spanish-speaking residents may contact the public water system to obtain a translated copy of the notice or assistance in Spanish; and
  - (B) When a non-English speaking group other than Spanish-speaking exceeds 1,000 residents or 10 percent of the residents served by the public water system, the notice shall include:
    1. Information in the appropriate language(s) regarding the importance of the notice; or
    2. A telephone number or address where such residents may contact the public water system to obtain a translated copy of the notice or assistance in the appropriate language; and

(d) Each public notice given pursuant to this article shall:

- (1) Be displayed such that it catches people's attention when printed or posted and be formatted in such a way that the message in the public notice can be understood at the eighth-grade level;
- (2) Not contain technical language beyond an eighth-grade level or print smaller than 12 point; and
- (3) Not contain language that minimizes or contradicts the information being given in the public notice.

## Appendix 2. Public Notification Template

### **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.

#### **Westminster Woods Camp Failed to Conduct Lead and Copper Monitoring in 2014 or 2015**

We failed to test the drinking water for lead and copper in 2014 or 2015. Although this is not an emergency, as our customers, you have a right to know what happened, what you should do, and what we did to correct the situation. Please share this information with other people who drink this water, especially those who may not have received this notice directly. You can do this by posting this notice in a public place or giving out copies by hand or mail.

#### **What happened?**

We are required by state regulations to monitor our drinking water for specific contaminants on a regular basis. Results of this routine monitoring are an indicator of whether or not the drinking water meets health standards. We were instructed to conduct lead and copper tap monitoring in 2014 or 2015. However, we did not test for lead and copper during this periods and, therefore, cannot be sure of the quality of the drinking water at that time.

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

Copper is an essential nutrient, but some people who drink water containing copper in excess of the action level over a relatively short amount of time may experience gastrointestinal distress. Some people who drink water containing copper ion excess of the action level over many years may suffer liver or kidney damage. People with Wilson's Disease should consult their personal doctor.

Infants and children who drink water containing lead in excess of the action level may experience delays in their physical or mental development. Children may show slight deficits in attention span and learning abilities. Adults who drink water high in lead over many years may develop kidney problems or high blood pressure.

#### **What should I do?**

You do not need to take any corrective actions. This is not an emergency. If you have health concerns, you may wish to consult your doctor. General guidelines on lead and copper drinking water are available from EPA's Safe Drinking Water Hotline at (800) 426-4791.

#### **What corrective actions have been taken to prevent this violation from occurring in the future?**

[Describe corrective action].

This notification of the public is being done in compliance with Sections 64463.7 and 64465, Title 22 of the CCR as a means of keeping the public informed.

Persons wishing more information should contact: \_\_\_\_\_  
*(name)*

\_\_\_\_\_

*(address)*

\_\_\_\_\_

*(phone number)*

### APPENDIX 3. COMPLIANCE CERTIFICATION

Citation Number 02\_18\_16C\_023

Name of Water System: **Westminster Woods Camp**

System Number: **4901095**

I certify that the users of the water supplied by this water system were notified of the monitoring and reporting violations of Title 22, California Code of Regulations (CCR), Sections 64675 and that the following actions, as directed in 02\_18\_16C\_023 have been completed.

<u>Required Action</u>	<u>Date Completed</u>
(Citation Directive 2 and 3) Conduct lead and copper monitoring by collecting five tap samples and submit completed results worksheet with a copy of laboratory report.	
(Citation Directive 4) Public Notification – post in a conspicuous space; and use one of the listed methods (including Consumer Confidence Report) to reach persons not likely to be reach by public posting.	

\_\_\_\_\_  
Signature of Water System Representative

\_\_\_\_\_  
Date

**Attach a copy of the notice posted in the system and a copy published via other notification methods.**

**THIS FORM MUST BE COMPLETED AND RETURNED TO THE DIVISION NO LATER THAN  
JULY 22, 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.