



Ron Chapman, MD, MPH  
Director & State Health Officer

State of California—Health and Human Services Agency  
**California Department of Public Health**

DRINKING WATER FIELD OPERATIONS BRANCH

50 D STREET, SUITE 200, SANTA ROSA, CA 95404

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EDMUND G. BROWN JR.  
Governor

June 11, 2013

Water System No. 4900791

Matt Widener  
Western Mobile Home Park  
871 38<sup>th</sup> Avenue  
Santa Cruz, CA 95062

**CITATION NO. 02-18-13C-023  
TRICHLOROETHYLENE AND CIS-1,2-DICHLOROETHYLENE MONITORING AND  
REPORTING VIOLATION FOR THE FIRST QUARTER OF 2013**

Enclosed is a Citation issued to Western Mobile Home Park (System).

Your System will be billed at the Department's hourly rate (currently estimated at \$126.00) for the time spent on issuing this Citation since this is an enforcement action for noncompliance with State regulations. At this time, we have spent approximately one hour on enforcement activities associated with this violation. You will receive a bill sent from our Fee Billing Unit in Sacramento on approximately August 1, 2013. This bill will contain fees for any enforcement time spent on your System.

If you have any questions regarding this matter, please contact Waldon Wong of my staff at (707) 576-2764 or me at (707) 576-2006.

Sincerely,

Janice M. Thomas, P.E.  
Sonoma District Engineer  
Drinking Water Field Operations Branch

Enclosures

CC (w/ Enclosures): Tim Ehlert, P.O. Box 176, Sebastopol, CA 95473

STATE OF CALIFORNIA

DEPARTMENT OF PUBLIC HEALTH

**Name of Public Water System:** Western Mobile Home Park

**Water System No:** 4900791

**To:** Matt Widener  
871 38<sup>th</sup> Avenue  
Santa Cruz, CA 95062

**Issued:** June 11, 2013

**CITATION FOR NONCOMPLIANCE**

**With Title 22 of the California Code of Regulations Section**

**64445.1(c)(4)**

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 4, commencing with Section 116270), or any regulation, standard, permit or order issued thereunder.

The Division of Drinking Water and Environmental Management of the State of California Department of Public Health (Department) hereby issues a



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citation to Western Mobile Home Park (System) for failure to comply with Title 22, California Code of Regulations (CCR) Section 64445.1(c)(4).

**APPLICABLE AUTHORITIES**

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).

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(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, Section 64445.1(c)(4) states in relevant part:

(c) When organic chemicals are detected pursuant to Table 64445.1-A.  
(4) If the detected level of organic chemicals for any sampling site does not exceed any shown in Table 64444-A, the water source shall be resampled every three months and the samples analyzed for the detected chemicals.

California Code of Regulations, Section 64444 states in relevant part:

The MCLs for the primary drinking water chemicals shown in Table 64444-A shall not be exceeded in the water supplied to the public.

Table 64444-A  
Maximum Contaminant Levels  
Organic Chemicals

<i>Chemical</i>	<i>Maximum Contaminant Level, mg/L</i>
Trichloroethylene	0.005
cis-1,2-dichloroethylene	0.006

**STATEMENT OF FACTS**

The Department received monitoring results for trichloroethylene from Well 01 of 1.3 micrograms per liter (ug/L) in September 2003, and from Well 02 of

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1.8 micrograms per liter (ug/L) in October 1999. By letter dated December 9, 2004, the System was notified of the requirement to commence quarterly trichloroethylene monitoring for Well 01 and Well 02.

The Department received a September 2011 cis-1,2-dichloroethylene monitoring result for Well 01 of 0.5 micrograms per liter (ug/L) and for Well 02 of 0.53 micrograms per liter (ug/L). By letter dated November 3, 2011, the System was notified of the requirement to commence quarterly cis-1,2-dichloroethylene monitoring for Well 01 and Well 02.

Pursuant to Section 64445.1(c)(4), Title 22 of the CCR, the System is required to collect one trichloroethylene and one cis-1,2-dichloroethylene sample per quarter in Well 01 and Well 02. The analytical results of all required samples collected for a system in a calendar month shall be reported to the Department not later than the tenth day of the following month.

As of the date of this Citation, the Division of Drinking Water and Environmental Management of the Department of Public Health has not received results for trichloroethylene and cis-1,2-dichloroethylene samples collected in the first quarter of 2013.

**DETERMINATIONS**

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**THE DEPARTMENT HAS DETERMINED:**

The System violated Title 22 of the CCR, Section 64445.1(c)(4), in that the System failed to collect the required number of trichloroethylene and cis-1,2-dichloroethylene samples during the first quarter of 2013.

**DIRECTIVES**

Western Mobile Home Park is hereby directed to take the following actions:

- 1. Comply with Section 64445.1(c)(4), Title 22, of the CCR in all future monitoring periods. The System must continue with quarterly trichloroethylene and cis-1,2-dichloroethylene monitoring of Well 01 and Well 02.
- 2. Notify all persons served by the System of the trichloroethylene and cis-1,2-dichloroethylene monitoring requirements, in conformance with Section 64463.4 and 64465, Title 22 of the CCR, and as follows:
  - a) Completion of Attachment A to include the name, address, and telephone number of a System representative as a source of additional information concerning the public notice. **You must**

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**also give a legible, written description (preferably typed) of the corrective actions taken by the water system to prevent this violation from occurring in the future. You must use the space provided in Attachment A for this written description.**

b) Provide the notice by mail or direct delivery, **after it has been completed in accordance with (a) above**, to each customer or service connection served by the System by **July 12, 2013**.

c) Provide public notice for this violation in accordance with Section 64465(c), Title 22 or the CCR, which requires for each non-English speaking group that exceeds 1,000 residents or 10% of the residents in a community (whichever is less) that the public notice contain information in the appropriate language(s) regarding the importance of the notice, or contain a telephone number or address where such residents may contact the water system to receive a translated copy of the notice or to receive assistance in the appropriate language.

3. The System shall complete the attached Compliance Certification form and return it to the Department within 10 days of the public notice being given to system customers but in no case later than **July 22, 2013** **A copy of the notice delivered to the customers, and a copy of the laboratory results must be attached to the form.**

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The Department 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.

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

All submittals required by this Citation shall be submitted to the Department at the following address: Janice M. Thomas, P.E.  
Department of Public Health  
Drinking Water Field Operations Branch  
50 D Street, Suite 200  
Santa Rosa, CA 95404

**PARTIES BOUND**

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

**SEVERABILITY**

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

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**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 Department 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 Department; and petition the superior court to take various enforcement measures against a public water system that has failed to comply with orders of the Department. The Department does not waive any further enforcement action by issuance of this citation.

June 11, 2013  
Date

Janice M. Thomas  
Janice M. Thomas, P.E.  
Sonoma District Engineer  
Drinking Water Field Operations Branch

Attachments  
Certified Mail No.: 7012 2210 0001 9133 4062  
4900791/Compliance  
02-18-13C-023-4900791-03.docx/BKE



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### COMPLIANCE CERTIFICATION

**Citation Number: 02-18-13C-023**

Name of Water System: **Western Mobile Home Park**

System Number: **4900791**

#### Certification

I certify that the users of the water supplied by this water system were notified of the trichloroethylene and cis-1,2-dichloroethylene I monitoring violations of Title 22, California Code of Regulations (CCR) for the compliance period of first quarter of 2013.

Required Action	Date Completed
Complete Attachment A, as required in Directive 2(a)	<input type="text"/>
Public Notification – Mail or Direct Delivery	<input type="text"/>
Completed Chemical Monitoring Results	<input type="text"/>
_____	_____
Signature of Water System Representative	Date

**Attach a copy of the notice posted in the system, a copy published in the newspaper, and lab results of completed sampling.**

**THIS FORM MUST BE COMPLETED AND RETURNED TO THE DEPARTMENT  
NO LATER THAN JULY 22, 2013**

**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.

**IMPORTANT INFORMATION ABOUT YOUR DRINKING WATER**

Este informe contiene informacion muy importante sobre su agua potable. Traduzcalo o hable con alguien que lo entienda bien.

**Western Mobile Home Park Failed to Test for trichloroethylene and cis-1,2-dichloroethylene during First Quarter of 2013  
January/February/March 2013**

We failed to test the drinking water for trichloroethylene and cis-1,2-dichloroethylene during the first quarter of 2013. 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. During January/February/March of 2013, we did not test for trichloroethylene and cis-1,2-dichloroethylene and, therefore, cannot be sure of the quality of the drinking water at that time.

**What does this mean?**

The California Department of Public Health (CDPH) sets drinking water standards and has determined that trichloroethylene and cis-1,2-dichloroethylene pose a chronic health concern at high levels of exposure. Some people who drink water containing trichloroethylene in excess of the MCL over many years may experience liver problems and may have an increased risk of getting cancer. Some people who use water containing cis-1,2-dichloroethylene in excess of the MCL over many years may experience liver problems. Quarterly chemical sampling is important to periodically verify the quality of your drinking water.

**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 arsenic in 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?**

This notification of the public is being done in compliance with Sections 64463.4 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)*