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GOVERNOR



MATTHEW RODRIGUEZ  
SECRETARY FOR  
ENVIRONMENTAL PROTECTION

## State Water Resources Control Board

Division of Drinking Water  
Water System No. 4910308

May 5, 2015

Curtis Griffin  
California State Park – Wrights Beach State Park  
P.O. Box 123  
Duncans Mills, CA 95430

### **CITATION NO. 02-18-15C-022 SURFACE WATER TREATMENT RULE PERFORMANCE STANDARD VIOLATION FOR JANUARY 2015**

Enclosed is a Citation issued to the California State Park – Wrights Beach State Park (System) public water system.

California State Park - Wrights Beach State Park will be billed at the State Water Resources Control Board Division of Drinking Water's (Division) hourly rate (currently estimated at \$128.00) 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.

California State Park - Wrights Beach State Park will receive a bill sent from the Water Board in August of the next fiscal year. This bill will contain fees for any enforcement time spent on California State Park - Wrights Beach State Park for the current fiscal year.

If you have any questions regarding this matter, please contact Karen Bolan of my staff at (707) 576-2730 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. 02-18-15C-022

c: Russell Citlau, P.O. Box 123, Duncans Mills, CA 95430  
Dave Hallstrom, 740 O Street, Sacramento, CA 95814

FELICIA MARCUS, CHAIR | THOMAS HOWARD, EXECUTIVE DIRECTOR

4910308/Compliance  
02\_18\_15C\_022\_4910308\_44/GC

50 D Street, Suite 200, Santa Rosa, CA 95404 | [www.waterboards.ca.gov](http://www.waterboards.ca.gov)

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STATE OF CALIFORNIA  
WATER RESOURCES CONTROL BOARD  
DIVISION OF DRINKING WATER

**Name of Public Water System:** California State Park - Wrights Beach  
State Park

**Water System No:** 4910308

**To:** California Department of Parks & Recreation  
P.O. Box 123  
Duncans Mills, CA 95430

**Physical Location:** 7095 Highway 1, Bodega Bay, CA 94923

**Issued:** May 5, 2015

**CITATION FOR NONCOMPLIANCE  
WITH TURBIDITY PERFORMANCE STANDARD**

**JANUARY 2015**

**AND**

**AMENDMENT PERMIT TO WATER SUPPLY PERMIT No. 02-92-010**

The Division of Drinking Water of the State of California Water Resources Control Board (Division) hereby issues a citation to the : California State Park - Wrights Beach State Park (hereinafter System) for failure to comply

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with Title 22, California Code of Regulations (CCR) Sections 64653 and Amendment to Permit No. 02-92-010 Provision 8.

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. A copy of the *Applicable Statutes and Regulations* is located in Appendix 1, which is attached hereto and incorporated by reference.

**STATEMENT OF FACTS**

The turbidity performance standard of the System’s filtration treatment was established in Amendment to Water Supply Permit No. 02-92-010 as 0.2 nephelometric turbidity units (NTU) in 95 percent of the effluent measurements taken each month. The Division received the January 2015 monthly compliance report showing the effluent turbidity level met the 0.2 NTU standard in only 70 percent of the filter effluent measurements.

According to the approved Operations Plan, the System may demonstrate filter performance when turbidity exceeds 0.2 NTU by conducting a Water Filterability Test. The Water Filterability Test demonstrates that the filter is removing particles greater than two micrometers in diameter, effectively

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removing *Giardia lamblia*-sized particles. As of the date of this Citation, the Division has not received any results of a Water Filterability Test conducted by the System.

**DETERMINATIONS**

The System violated Title 22, CCR, Sections 64653 and Permit Amendment Provision 8 to the Permit No. 02-92-010. Section 64653 requires adherence to turbidity performance standards; Permit Amendment Provision 8 defines the turbidity performance standard as equal to or less than 0.2 NTU in 95 percent of the measurements taken each month. Also, Title 22, CCR, Section 64463.4 requires a Tier 2 Public Notice for violations of monitoring and testing procedure requirements. .

**DIRECTIVES**

California State Park - Wrights Beach State Park is hereby directed to take the following actions:

- 1. Comply with Sections 64653, Title 22, CCR, Permit No. 02-92-010, and the Amendment Permit to the Permit No. 02-92-010 in all future monitoring periods.

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2. On or before **June 5, 2015**, notify all persons served by the System of the turbidity performance standard violation in conformance with Title 22, Sections 64463.4 and 64465. Appendix 2: Public Notification Template may be used to fulfill this directive.

3. The System shall complete Appendix 3: Compliance Certification. Submit it with a copy of the public notification to the Division on or before **June 12, 2015**.

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.

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 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

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**PARTIES BOUND**

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

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**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**

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      May 5, 2015  
Janice M. Thomas, P.E., Sonoma District Engineer      Date  
Division of Drinking Water  
STATE WATER RESOURCES CONTROL BOARD



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Appendices (3):

1. Applicable Statutes and Regulations
2. Public Notification Template
3. Compliance Certification

Certified Mail No. 70132250000054483552

4910308/Compliance  
02\_18\_15C\_022\_4910308\_44 /GC

## APPENDIX 1. APPLICABLE STATUTES AND REGULATIONS FOR CITATION NO. 02\_18\_15C\_022

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 64463.4 states in relevant part:

- (a) A water system shall give public notice pursuant to this section if any of the following occurs:
  - (3) Other violations of the monitoring and testing procedure requirements in this chapter, and chapters 15.5, 17 and 17.5, for which the Department determines that a Tier 2 rather than a Tier 3 public notice is required, based on potential health impacts and persistence of the violations;
- (b) A water system shall give the notice as soon as possible within 30 days after it learns of a violation or occurrence specified in subsection (a), except that the water system may request an extension of up to 60 days for providing the notice. This extension would be subject to the Department's written approval based on the violation or occurrence having been resolved and the Department's determination that public health and welfare would in no way be adversely affected. In addition, the water system shall:
  - (1) Maintain posted notices in place for as long as the violation or occurrence continues, but in no case less than seven days;
  - (2) Repeat the notice every three months as long as the violation or occurrence continues. Subject to the Department's written approval based on its determination that public health would in no way be adversely affected, the water system may be allowed to notice less frequently but in no case less than once per year.
- (c) A water system shall deliver the notice, in a manner designed to reach person served, within the required time period as follows:
  - (2) Unless otherwise directed by the Department 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 public 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.

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

- (a) Each public notice given pursuant to this article, except Tier 3 public notices for variances and exemptions pursuant to subsection (b), shall contain the following:
- (1) A description of the violation or occurrence, including the contaminant(s) of concern, and (as applicable) the contaminant level(s);
  - (2) The date(s) of the violation or occurrence;
  - (3) Any potential adverse health effects from the violation or occurrence, including the appropriate standard health effects language from appendices 64465-A through G;
  - (4) The population at risk, including subpopulations particularly vulnerable if exposed to the contaminant in drinking water;
  - (5) Whether alternative water supplies should be used;
  - (6) What actions consumers should take, including when they should seek medical help, if known;
  - (7) What the water system is doing to correct the violation or occurrence;
  - (8) When the water system expects to return to compliance or resolve the occurrence;
  - (9) The name, business address, and phone number of the water system owner, operator, or designee of the water system as a source of additional information concerning the public notice;
  - (10) A statement to encourage the public notice recipient to distribute the public notice to other persons served, using the following standard language: —Please share this information with all the other people who drink this water, especially those who may not have received this public notice directly (for example, people in apartments, nursing homes, schools, and businesses). You can do this by posting this public notice in a public place or distributing copies by hand or mail.¶; and
  - (11) For a water system with a monitoring and testing procedure violation, this language shall be included: —We are required to monitor your drinking water for specific contaminants on a regular basis. Results of regular monitoring are an indicator of whether or not your drinking water meets health standards. During [compliance period dates], we [ did not monitor or test' or did not complete all monitoring or testing'] for [contaminant(s)], and therefore, cannot be sure of the quality of your drinking water during that time.
- (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.

California Code of Regulations (CCR), Section 64653 states in relevant part:

- (a) All approved surface water utilized by a supplier shall be treated using one of the following filtration technologies unless an alternative process has been approved by the Department pursuant to subsections (e), (f), (g) and (h):
- (e) An alternative to the filtration technologies specified in subsection (a) may be used provided that the supplier demonstrates to the Department that the alternative technology:
  - (1) Provides a minimum of 99 percent Giardia lamblia cyst removal, 90 percent virus removal for the suppliers serving more than 500 persons, and 99 percent Cryptosporidium removal; and
  - (2) Meets the turbidity performance standards established by the Department, as determined from the alternative filtration technology demonstration conducted pursuant to subsection (f). The turbidity performance standards shall not be less stringent than the turbidity performance standards established in subsection (c)(1).
- (f) The alternative filtration technology demonstration shall be based on the results from a prior equivalency demonstration or a testing of a full scale installation that is treating a water with similar characteristics and is exposed to similar hazards as the water proposed for treatment. A pilot plant test of the water to be treated may also be used for this demonstration if conducted with the approval of the Department. The demonstration shall be presented in an engineering report prepared by a qualified engineer.
- (h) The Department's approval of alternative filtration technologies, including establishment of performance standards and monitoring requirements, shall be done in accordance with the permit process specified in sections 116525 through 116550 of the Health and Safety Code.

California Code of Regulations (CCR), Section 64663 states 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:

**Table 64663  
Combined Filter Effluent Turbidity Exceedances  
Requiring Department Notification**

<i>If a supplier uses...</i>	<i>And the turbidity of the combined filter effluent monitored and recorded pursuant to section 64655 ...</i>
(5) An alternative filtration technology pursuant to section 64653	Exceeds the maximum performance standard established pursuant to sections 64653(e), (f), (g), and (h).

Amendment to Water Supply Permit No. 02-92-010, issued to the System on October 25, 1999, states in relevant part:

- 8. Wright's Beach State Beach shall operate its surface water treatment plant in accordance with the following performance standards and operating criteria:

- a) The turbidity level of the final filtered water shall be equal to or less than 0.2 NTU in 95 percent of the measurements taken each month, shall not exceed 1.0 NTU at any time, and shall not exceed 0.5 NTU for more than eight consecutive hours while the plant is in operation.
- b) When the filter is placed into service, the effluent shall not exceed 1.0 NTU at any time and shall not exceed 0.2 NTU after the filter has been in operation for 4 hours.
- c) The residual disinfectant concentrations of samples collected from the distribution system shall be detectable in at least 95 percent of the samples taken each month, during each and every two consecutive months that the plant supplies water to the public.

## 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.

### California State Park - Wrights Beach State Park Failure to Meet Treatment Requirements

Our water system recently violated a drinking water standard. Although this incident was 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 your water for turbidity (cloudiness). This tells us whether we are effectively filtering the water supply. Between January 2 and 7, 2015, the turbidity was above the standard. Extra tests were not completed to show the water was safe.

#### What should I do?

- **You do not need to boil your water or take other actions.**
- This is not an emergency. If it had been you would have been notified immediately. We do not know of any contamination, and none of our testing has shown disease-causing organisms in the drinking water.
- *Turbidity has no health effects. However, high levels of 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 that 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.*
- 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 U.S. EPA's Safe Drinking Water Hotline at 1(800) 426-4791.
- If you have other health issues concerning the consumption of the water, you may wish to consult your doctor.

#### What happened? What was done?

Turbidity was above the standard due to rain. The required filterability test was not done to show the water was safe. To fix the problem, the water treatment operator was trained to do the extra testing that is required.

For more information, please contact [name of contact] at [phone number] or [mailing address].

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

### **Secondary Notification Requirements**

Upon receipt of notification from a person operating a public water system, the following notification must be given within 10 days [Health and Safety Code Section 116450(g)]:

- RESIDENTIAL RENTAL PROPERTY OWNERS OR MANAGERS (including nursing homes and care facilities): Must notify tenants.

This notice is being sent to you by California State Park – Wrights Beach State Park.

State Water System ID#: \_\_\_\_\_. Date distributed: \_\_\_\_\_.

### APPENDIX 3. COMPLIANCE CERTIFICATION

Citation Number 02\_18\_15C\_022

Name of Water System: **California State Park - Wrights Beach State Park**

System Number: **4910308**

I certify that the users of the water supplied by this water system were notified of the treatment technique violation of Title 22, California Code of Regulations (CCR), Sections 64653 for the compliance period of January 2015 and that the following actions, as directed in 02\_18\_15C\_022 have been completed.

<u>Required Action</u>	<u>Date Completed</u>
(Citation Directive 2) Public Notification – Posting in conspicuous locations throughout the area served by the water system	

\_\_\_\_\_  
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  
June 12, 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.