



EDMUND G. BROWN JR.
GOVERNOR

MATTHEW RODRIGUEZ
SECRETARY FOR
ENVIRONMENTAL PROTECTION

State Water Resources Control Board

Division of Drinking Water

April 15, 2016

Water System No. 4901106

Steve Grant, Facilities Director
Catholic Charities - CYO Camp
990 Eddy Street
San Francisco, CA 94109

CITATION NO. 02_18_16C_010
Disinfection VIOLATION FOR January 2016

Enclosed is a Citation issued to the Catholic Charities - CYO Camp (System) public water system.

Catholic Charities - CYO 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.

Catholic Charities - CYO Camp will receive a bill sent from our Division Fee Billing Unit in August of the next fiscal year. This bill will contain any fees for any enforcement time spent on the Catholic Charities - CYO Camp 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_16C_010

STATE OF CALIFORNIA
WATER RESOURCES CONTROL BOARD
DIVISION OF DRINKING WATER

Name of Public Water System: Catholic Charities - CYO Camp

Water System No: 4901106

To: Steve Grant, Facilities Director
990 Eddy Street
San Francisco, CA 94109

Physical Location: 2136 Bohemian Highway
Occidental, CA 95465

Issued: April 15, 2016

CITATION FOR NONCOMPLIANCE

**Disinfection Treatment Technique Violation
Januray 2016**

The Division of Drinking Water of the State of California Water Resources Control Board (Division) hereby issues a citation to Catholic Charities - CYO Camp (hereinafter System) for failure to comply with Title 22, California Code of Regulations (CCR) Section 64652(a)(1), and Domestic Water Supply Permit 02-18-02P-4901106 Provision 4.



1 Section 116650 of the California Health and Safety Code (CHSC),
2 authorizes the issuance of a citation for failure to comply with a requirement
3 of California Safe Drinking Water Act (CHSC, Division 104, Part 12, Chapter
4 4, commencing with Section 116270), or any regulation, standard, permit or
5 order issued thereunder. A copy of the *Applicable Statutes and Regulations*
6 is located in Appendix 1, which is attached hereto and incorporated by
7 reference.
8

9
10 **STATEMENT OF FACTS**

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12 Section 64654 of the CCR requires that all approved surface water shall be
13 provided with continuous disinfection treatment sufficient to insure that the
14 total treatment process provides inactivation of *Giardia lamblia* cysts, in
15 conjunction with the removals obtained through filtration, to meet the 3-log
16 reduction requirements for *Giardia lamblia* cysts.

17
18 Domestic Water Supply Permit 02-18-02P-4901106 Provision 4 gives the
19 filtration system a 2-log *Giardia lamblia* removal credit. Therefore, the
20 disinfection process must provide at least 1 log *Giardia lamblia* inactivation.

21
22 The Water System reported achieving less than 1-log inactivation of *Giardia*
23 *lamblia* through disinfection during one of the 16 days (6.25 percent) the
24 treatment plant was operating during the month of January 2016. Therefore,
25 the Water System was in violation of Section 64652(a)(1), Title 22 of the
26 CCR and Domestic Water Supply Permit 02-18-02P-4901106 Provision 4.
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DETERMINATIONS

The System violated Title 22, CCR, Section 64652(a)(1) and Domestic Water Supply Permit 02-18-02P-4901106 Provision 4.

DIRECTIVES

Catholic Charities - CYO Camp is hereby directed to take the following actions:

- 1. Comply with Sections 64652(a)(1) and Domestic Water Supply Permit 02-18-02P-4901106 in all future monitoring periods.
- 2. On or before **May 15, 2016**, notify all persons served by the System of the 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 **May 25, 2016**.
- 4. The System shall update the plant operations plan to comply with Title 22, Section 64661, including a description of procedures to

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follow in the case of a low chlorine residual sample at the clearwell.
Submit the plan by **May 25, 2016**.

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

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

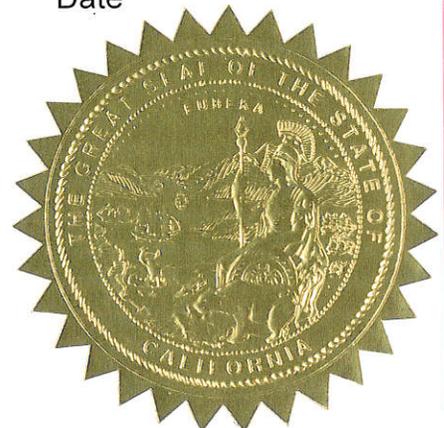
Division 104, Part 12, Chapter 4, (commencing with Section 116270) of the California Health and Safety Code authorizes the Division to: issue additional citations with assessment of penalties if the System continues to fail to correct a violation identified in a citation; take action to suspend or revoke 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

April 15, 2016

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

Date



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Appendices (3):

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

Certified Mail No. 7014 (206000)11677259

4901106/Compliance
02_18_16C_010_4901106_41/KAB

**APPENDIX 1. APPLICABLE STATUTES AND REGULATIONS
FOR CITATION NO. 02_18_16C_010**

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:

- (c) A water system shall deliver the notice, in a manner designed to reach person served, within the required time period as follows:
 - (1) 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, community water systems shall give public notice by:
 - (A) Mail or direct delivery to each customer receiving a bill including those that provide their drinking water to others (e.g., schools or school systems, apartment building owners, or large private employers), and other service connections to which water is delivered by the water system; and
 - (B) Use of one or more of the following methods to reach persons not likely to be reached by a mailing or direct delivery (renters, university students, nursing home patients, prison inmates, etc.):
 - 1. Publication in a local newspaper;
 - 2. Posting in conspicuous public places served by the water system, or on the Internet; or
 - 3. Delivery to community organizations.

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 64652 states in relevant part:

- (a) A supplier using an approved surface water shall provide multibarrier treatment that meets the requirements of this chapter and reliably ensures at least, between a point where the raw water is not subject to recontamination by surface water runoff and a point downstream before or at the first customer:
 - (1) A total of 99.9 percent reduction of Giardia lamblia cysts through filtration and disinfection;
 - (2) A total of 99.99 percent reduction of viruses through filtration and disinfection; and
 - (3) A total of 99 percent removal of Cryptosporidium through filtration.

California Code of Regulations (CCR), Section 64652 states in relevant part:

- (a) A supplier shall operate each treatment plant in accordance with an operations plan that has been approved by the State Board. With a permit application for a new treatment plant or modification to an existing treatment plant, the supplier shall submit for State Board review the operations plan to determine if it includes those items required in subsection (b). The State Board shall review the operations plan to determine if it includes those items required in subsection (b). The operations plan shall be designed to produce the optimal water quality from the treatment process. The supplier shall operate its treatment plant in accordance with the approved plan.
- (b) The operations plan shall consist of a description of the utility's treatment plant performance monitoring program, unit process equipment maintenance program, filter media inspection program, operating personnel, including numbers of staff, certification levels and responsibilities; how and when each unit process is operated; laboratory procedures; procedures used to determine chemical dose rates; records; response to plant and watershed emergencies; and reliability features.

Instructions for Tier 2 SWTR Disinfection Treatment Notice Template

Template Attached

Since surface water treatment disinfection treatment technique violations are included in Tier 2, you must provide public notice to persons served as soon as practical but within 30 days after you learn of the violation [California Code of Regulations, Title 22, Chapter 15, Section 64463.4(b)]. Some disinfection problems may be serious. **Each water system required to give public notice must submit the notice to the State Water Resources Control Board, Division of Drinking Water (DDW) for approval prior to distribution or posting, unless otherwise directed by the DDW [64463(b)].**

Notification Methods

You must use the methods summarized in the table below to deliver the notice to consumers. If you mail, post, or hand deliver, print your notice on letterhead, if available.

If You Are a...	<i>You Must Notify Consumers by...</i>	<i>...and By One or More of the Following Methods to Reach Persons Not Likely to be Reached by the Previous Method...</i>
Community Water System [64463.4(c)(1)]	Mail or direct delivery ^(a)	Publication in a local newspaper
		Posting ^(b) in conspicuous public places served by the water system or on the Internet
		Delivery to community organizations
Non-Community Water System [64463.4(c)(2)]	Posting in conspicuous locations throughout the area served by the water system ^(b)	Publication in a local newspaper or newsletter distributed to customers
		Email message to employees or students
		Posting ^(b) on the Internet or intranet
		Direct delivery to each customer

(a) Notice must be distributed to each customer receiving a bill including those that provide their drinking water to others (e.g., schools or school systems, apartment building owners, or large private employers), and other service connections to which water is delivered by the water system.

(b) Notice must be posted in place for as long as the violation or occurrence continues, but in no case less than seven days.

The notice attached is appropriate for the methods described above. However, you may wish to modify it before using it for posting in public places served by the water system. If you do, you must still include all the required elements and leave the health effects and notification language in italics unchanged. This language is mandatory [64465].

Multilingual Requirement

The notice must (1) be provided in English, Spanish, and the language spoken by any non-English-speaking group exceeding 10 percent of the persons served by the water system and (2) include a telephone number or address where such individuals may contact the water system for assistance.

If any non-English-speaking group exceeds 1,000 persons served by the water system, but does not exceed 10 percent served, the notice must (1) include information in the appropriate language(s) regarding the importance of the notice and (2) contain the telephone number or address where such individuals may contact the water system to obtain a translated copy of the notice from the water system or assistance in the appropriate language.

Population Served

Make sure it is clear who is served by your water system -- you may need to list the areas you serve.

Description of the Violation

Choose from the following descriptions of violations and modify to fit your situation.

- Contact Time – “In order to ensure proper disinfection, water in the treatment plant must be in contact with chlorine or a similar disinfectant for a minimum amount of time. On [date], this did not occur. Although chlorine quickly kills most bacteria, it is less effective against organisms such as viruses and parasites. For this reason, water needs to mix with chlorine for a longer time period to kill such organisms. The amount of time necessary, or the “contact time”, depends on the amount of disinfectant in the water and the temperature of the water.”
- Disinfectant Residual – “We routinely monitor for disinfectant residual in the distribution system. This measurement tells us whether we are effectively disinfecting the water supply. Disinfectant residual is the amount of chlorine or related disinfectant present in the pipes of the distribution system. If the amount of disinfectant is too low, organisms could grow in the pipes.”
- Monthly Exceedance (Distribution System) – “During the month of [month], disinfectant residual was undetected in more than 5% of samples. The standard is that disinfectant may be undetectable in no more than 5% of samples taken each month.”
- Single Exceedance (Entry to the Distribution System) – “On [date], disinfectant levels dropped below 0.2 milligrams per liter (mg/L) for [number] hours. The standard is that levels may not drop below 0.2 mg/L for more than four hours.”

Corrective Action

In your notice, describe corrective actions you are taking. Listed below are some steps commonly taken by water systems with disinfection treatment technique violations. Use one or more of the following actions, if appropriate, or develop your own:

- “We are sampling/we sampled both untreated and treated water for the presence of coliform bacteria.”
- “We are sampling/we sampled disinfectant levels and will adjust/adjusted the amount of disinfectant added as necessary to maintain adequate levels.”

After Issuing the Notice

Send a copy of each type of notice and a certification that you have met all the public notice requirements to the DDW within ten days after you issue the notice [64469(d)]. You should also issue a follow-up notice in addition to meeting any repeat notice requirements the DDW sets.

It is recommended that you notify health professionals in the area of the violation. People may call their doctors with questions about how the violation may affect their health, and the doctors should have the information they need to respond appropriately.

It is a good idea to issue a “problem corrected” notice when the violation is resolved.

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.

Catholic Charities – CYO Camp Did Not Meet Treatment Requirement (Disinfection)

Our water system recently violated a drinking water 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 are doing to correct this situation.

In order to ensure proper disinfection, water in the treatment plant must be in contact with chlorine for a minimum amount of time. On January 21, 2016, this did not occur. Although chlorine quickly kills most bacteria, it is less effective against organisms such as viruses and parasites. For this reason, water needs to mix with chlorine for a longer time period to kill such organisms. The amount of time necessary, or the "contact time", depends on the amount of disinfectant in the water and the temperature of the water.

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. Tests taken during this same time period did not indicate the presence of bacteria in the water.
- *Inadequately treated water may contain disease-causing organisms. These organisms include bacteria, viruses, and parasites that can cause symptoms such as nausea, cramps, diarrhea, and associated headaches. These symptoms, however, are not caused only by organisms in drinking water, but also by other factors. 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 this water, you may wish to consult with your doctor.

What happened? What is being done?

We are updating our procedures to make sure this does not happen in the future. Contact times so far this month have met all requirements.

For more information, please contact Bruce Blagsvedt at (707) 874-0200.

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)]:

- SCHOOLS: Must notify school employees, students, and parents (if the students are minors).
- RESIDENTIAL RENTAL PROPERTY OWNERS OR MANAGERS (including nursing homes and care facilities): Must notify tenants.
- BUSINESS PROPERTY OWNERS, MANAGERS, OR OPERATORS: Must notify employees of businesses located on the property.

This notice is being sent to you by Catholic Charities – CYO Camp.

State Water System ID#: _4901106_. Date distributed: _____.

APPENDIX 3. COMPLIANCE CERTIFICATION

Citation Number 02_18_16C_010

Name of Water System: **Catholic Charities – CYO Camp**

System Number: **4901106**

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 64652(a)(1) for the compliance period of January 2016 and that the following actions, as directed in 02_18_16C_010 have been completed.

<u>Required Action</u>	<u>Date Completed</u>
(Citation Directive 2) Public Notification - Posting and Other Notification Methods completed.	
(Citation Directive 4) Plant Operations Plan	

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
May 23, 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.