



EDMUND G. BROWN JR.
GOVERNOR



MATTHEW RODRIGUEZ
SECRETARY FOR
ENVIRONMENTAL PROTECTION

State Water Resources Control Board

Division of Drinking Water

Water System No. 4900608

March 30, 2016

David Campbell
Six Acres Water Company
P.O. Box 460
Cloverdale, CA 95425

COMPLIANCE ORDER NO. 02_18_16R_001

The State Water Resources Control Board (Water Board), Division of Drinking Water is issuing the Six Acres Water Company public water system a compliance order (Order) for a threatened violation of Section 116555 of the California Health and Safety Code. Section 116555 requires that each public water system complies with primary and secondary drinking water standards, and provides a reliable and adequate supply of pure, wholesome, healthful, and potable water to its customers. Because of the vulnerability of the Six Acres Water Company's Well 02 to bacteriological contamination, the Division of Drinking Water has made the determination that the Six Acres Water Company may not be able to meet the requirements of Section 116555.

This Order requires that you provide a minimum of 99.99% (4-log) inactivation of viruses through disinfection at Well 02 at all times. Please read the Order carefully and contact me or Marianne Watada of my staff at (707) 576-2145 if you have any questions.

Sincerely,

A handwritten signature in blue ink that reads "Janice M. Thomas".

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

Enclosures: Compliance Order No. 02_18_16R_001

cc: (w/ Enclosures): Felix Hernandez

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STATE OF CALIFORNIA
WATER RESOURCES CONTROL BOARD
DIVISION OF DRINKING WATER

TO: SIX ACRES WATER COMPANY
ATTN: DAVID CAMPBELL
P.O. BOX 460
CLOVERDALE, CA 95425

COMPLIANCE ORDER NO. 02_18_16R_001
FOR
THREATENED VIOLATION OF CALIFORNIA HEALTH AND SAFETY
CODE SECTION 116555(a)(1) and (3)
SIX ACRES WATER COMPANY
4900608

Issued on March 30, 2016

Section 116655 of the California Health and Safety Code (hereinafter "CHSC") authorizes the issuance of a compliance order to a public water system for violations or threatened violations of the California Safe Drinking Water Act (CHSC, Division 104, Part 12, Chapter 4, (commencing with

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Section 116270) (hereinafter "California SDWA"), or any permit, regulation, or standard 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 compliance order (hereinafter "Order") to the Six Acres Mutual Water Company (hereinafter "the System"), for failure to comply with CHSC Section 116555 (a)(1) and (3).

A copy of the applicable statutes and regulations is included in Appendix 1, which is attached hereto and incorporated herein by this reference.

STATEMENT OF FACTS

The System is a community public water system serving a population of approximately 66 through 22 service connections. The System is located in Cloverdale, California.

The System relies on the water supply source Well 02 as its sole water source. There is no Department of Water Resources Well Completion

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Report on file for Well 02. Well 02 is reported to be between 30 to 36 feet deep. The Department of Water Resources Well Standards Bulletin 74-90 specifies a minimum annular seal for a community water supply well to be 50 feet.

Well 02 has no sanitary surface seal. The Department of Water Resources Well Standards Bulletin 74-90 specifies that a concrete base or pad shall be constructed at ground surface around the top of the well casing and in contact with the annular seal. The upper surface of the base shall slope away from the well casing and extend laterally at least two feet in all directions from the outside of the well boring.

At the time of the inspection, on November 24, 2015, a raw well bacteriological sample and distribution system sample were taken. Both samples were positive for total coliform. The System did not take a routine monthly bacteriological sample in November 2015. The System was issued Citation No. 02_18_16C_002 for noncompliance with total coliform monitoring and reporting.

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In the inspection letter dated December 23, 2015 (Attachment 1), the Division required the System to begin an investigation by January 31, 2016 to determine if the well was considered Groundwater Under the Direct Influence of Surface Water. Item 4 in the letter specifies “Due to the shallow well and the proximity to surface water, the System must conduct an investigation to determine if the well is groundwater under the direct influence of surface water (GWUDI). Handout 5A describing the testing and reporting requirements is enclosed.” Raw well bacteriological sampling of the well is required as part of the investigation. Item 2 of Handout 5A requires the following, “Monitor the source water once every two weeks for total coliform and E. coli bacteria for twelve consecutive months. Samples shall be analyzed by a State-certified laboratory using an enumeration method approved for testing for coliforms in drinking water. Results must be reported in units of Most Probable Number per 100 milliliter (MPN/100 mL). The sample volume collected and the analytical method used must be reported with the results.” The sampling has not been started.

DETERMINATIONS

The Division has determined that Well 02 may not meet the Primary Standards for bacteriological quality.

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DIRECTIVES

The System is hereby directed to take the following actions:

1. By **April 27, 2016**, the System shall provide a minimum of 99.99% (4-log) inactivation of viruses through disinfection at Well 02 at all times. Attachment 2 is an informational handout titled “Handout 120 Basics - 4-Log Virus Inactivation Through Chlorine Disinfection”.

2. The System shall submit a 4-log virus Inactivation Monitoring and Operations Plan. Attachment 3 is an Operations Plan form for use with chlorine disinfection titled Handout 121 Groundwater Rule 4-Log Virus Inactivation Using Chlorination Monitoring And Operations Plan. The Operations Plan must include a description of how the 4-log inactivation of viruses will be achieved and list the monitoring parameters, including: peak flow rate of the well, lowest water temperature, and chlorine residual monitoring location(s), so that a customized disinfection compliance spreadsheet can be prepared for the System.

3. Submit a permit amendment application for change in treatment. The permit amendment checklist is attached as Attachment 4. The checklist contains hyperlinks and was emailed to sixacreswater@att.net on March 30.

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The Division reserves the right to make such modifications to this Order as it may deem necessary to protect public health and safety. Such modifications may be issued as amendments to this Order and shall be deemed effective upon issuance.

Nothing in this Order relieves the System of its obligation to meet the requirements of the California SDWA, or any regulation, permit, standard, or order issued or adopted thereunder.

All submittals required by this Order shall be submitted to the Division at the following address:

Janice M. Thomas, P.E.
Sonoma District Engineer
State Water Resources Control Board
Division of Drinking Water
50 D Street, Suite 200
Santa Rosa, CA 95404

PARTIES BOUND

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

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SEVERABILITY

The Directives of this Order 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

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 public water 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 an order of the Board. The Board does not waive any further enforcement action by issuance of this compliance order.



Stefan Cajina, P.E., Chief
North Coastal Section
State Water Resources Control Board
Division of Drinking Water

March 30, 2016
Date

APPENDIX (1)

ATTACHMENTS (4)

Certified Mail No. 7014120000111677181

4900608/Compliance
02_18_16R_001_4900608/MFW



APPENDIX 1. APPLICABLE STATUTES AND REGULATIONS FOR COMPLIANCE ORDER NO. 02_18_16R_001

NOTE: The following language is provided for the convenience of the recipient, and cannot be relied upon as the State of California's representation of the law. The published codes are the only official representation of the law. Regulations related to drinking water are in Titles 22 and 17 of the California Code of Regulations. Statutes related to drinking water are in the Health & Safety Code, the Water Code, and other codes.

Section 116555 of the Health and Safety Code states in relevant part:

(a) Any person who owns a public water system shall ensure that the system does all of the following:

- (1) Complies with primary and secondary drinking water standards.
- (3) Provides a reliable and adequate supply of pure, wholesome, healthful, and potable water.

Section 116655 of the Health and Safety Code states in relevant part:

(a) Whenever the department determines that any person has violated or is violating this chapter, or any permit, regulation, or standard issued or adopted pursuant to this chapter, the director may issue an order doing any of the following:

- (1) Directing compliance forthwith.
- (2) Directing compliance in accordance with a time schedule set by the department.
- (3) Directing that appropriate preventive action be taken in the case of a threatened violation.

(b) An order issued pursuant to this section may include, but shall not be limited to, any or all of the following requirements:

- (1) That the existing plant, works, or system be repaired, altered, or added to.
- (2) That purification or treatment works be installed.
- (3) That the source of the water supply be changed.
- (4) That no additional service connection be made to the system.
- (5) That the water supply, the plant, or the system be monitored.
- (6) That a report on the condition and operation of the plant, works, system, or water supply be submitted to the department.