



October 12, 2016

Riverdale Park Track Community Services District  
c/o Kelly Murphy  
PO Box 580343  
Modesto, CA 95358

**RE: Riverdale Park Tract Community Services District #5000019 – Corrective Action Plan Review  
2426 Riverdale Avenue, Modesto, CA 95352**

Dear Mr. Murphy:

On October 10, 2016, the Department of Environmental Resources (DER) received the Corrective Action Plan (CAP) for Riverdale Park Tract Community Services District (Riverdale) required under Compliance Order No. DER-16CO-002 (Order). A review of the CAP was completed, and DER is unable to accept the current proposal due to the following items:

1. The CAP states in paragraph 5 that, “In the meantime, our uranium status is below the Maximum Contaminant [sic] Level (MCL) and we will be closely monitoring the levels until our corrective action plan is carried out. If our system were to exceed the uranium MCL again, we will enlist the help of SHE in applying for Interim Emergency funding as a temporary solution until our plan is seen through to completion.” This statement is not reflected in the reported uranium testing nor the Order.
  - a. Compliance with the uranium Maximum Contaminant Level (MCL) of 20 pCi/L is based on a Running Annual Average (RAA), which is the average of the last four quarters of uranium testing data.
  - b. The Well 03 West (5000019-003) Running Annual Average for the 3<sup>rd</sup> quarter of 2016 is as follows:

Sample Date	Quarter	Result pCi/L
12/28/15	4 <sup>th</sup> Quarter 2015	20
3/31/16	1 <sup>st</sup> Quarter 2016	23
5/31/16	2 <sup>nd</sup> Quarter 2016	21
8/18/16	3 <sup>rd</sup> Quarter 2016	19
RAA		21

- c. Riverview has been required under the Order to take certain actions in response to the system’s failure to meet the drinking water standard for uranium, including:
      - i. Providing quarterly public notification of Riverdale’s failure to meet the uranium MCL.
      - ii. Providing proof of each public notification within 10 days of completion.

2. The CAP time line chart (page 2) indicates that the water system will carry out a feasibility study with an anticipated time frame of approximately two years and projects a return to compliance date of August 31, 2022. The Order directs a return to compliance date of July 1, 2018.
  - a. As Riverview already has a supply line from the City of Modesto, the CAP does not address the necessity or the areas of examination in the proposed feasibility study. Therefore, this Department has no justification for extension of the compliance date.
  - b. The proposed time line does not demonstrate a timely progression towards providing a reliable and healthy source of water for the consumers of Riverview.
  - c. The request for funding of a feasibility study may not be supported by the Waterboards as consolidation is the preferred alternative for Small Community Water Systems such as Riverview.

Please be advised that Riverdale still must meet the requirements of Directive No. 5 and 6 of the Order, which directs the water system to submit for review and approval, and prior to implementation, a Corrective Action Plan. A Compliance Order Amendment 03 is being transmitted to the Riverdale under cover of this letter.

Please respond to each item of the Directive by the deadlines established in Amendment 03 and the Order. If you have any questions regarding this matter, please contact Rachel Riess at (209) 525-6720.

Sincerely,



Rachel Riess, REHS

Registered Environmental Health Specialist

Enclosure (1)

cc: Juan Cano, Self Help Enterprises, PO Box 6520, Visalia, CA 93290

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26

**STANISLAUS COUNTY**  
**DEPARTMENT OF ENVIRONMENTAL RESOURCES**  
**DIVISION OF ENVIRONMENTAL HEALTH**

**TO:** Riverdale Park Tract Community Services District  
2426 Riverdale Drive  
Modesto, CA 95358

**Attn:** Kelly Murphy, Board Member  
Riverdale Park Tract Community Services District

**AMENDMENT 03 TO COMPLIANCE ORDER NO. DER-16CO-002**  
**FOR**  
**WATER SYSTEM NO. 5000019**  
**Issued on October 12, 2016**

The Department of Environmental Resources (hereinafter "Department"), acting by and through its Division of Environmental Health (hereinafter "Division") and the Manager for the Division (hereinafter "Manager"), hereby issues this Amendment 03 to Compliance Order DER-16CO-002.

The Department issued Compliance Order No. DER-16CO-002, to Riverdale Park Tract Community Services District on or about February 2, 2016, herein the "Order".

The Department hereby further amends the Order as follows:

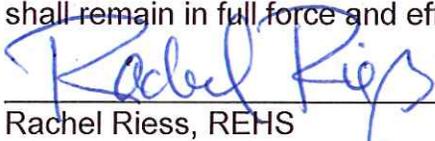
1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15

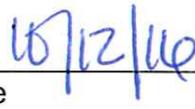
**DIRECTIVES**

A) Delete Directive 6 and replace with the following:

"On or before November 14, 2016, present the Corrective Action Plan required under Directive No. 5, herein above, to the Division in person at the Division's office located at 3800 Cornucopia Way, Suite C, Modesto, CA 95358".

Except as amended herein, all other terms of Compliance Order No. DER-16CO-002 shall remain in full force and effect.

  
\_\_\_\_\_

  
\_\_\_\_\_

Rachel Riess, REHS  
Senior Environmental Health Specialist  
Division of Environmental Health  
Department of Environmental Resources  
Stanislaus County

Date

Certified Mail No. 7014 3490 0001 6851 2997

