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**STATE OF CALIFORNIA
STATE WATER RESOURCES CONTROL BOARD**

**IN RE: Santa Clara Resources
c/o Pyramid Flowers
3813 West Doris Avenue
Oxnard, CA 93030**

**TO: Mr. Fred Van Wingerden
President**

CITATION

WATER SYSTEM NO.: 5603117

CITATION NO.: 04_06_16C_022_5603117_22

Section 116650 of Chapter 4, Part 12, Division 104 of the California Health and Safety Code (H&S Code), authorizes the issuance of a citation for failure to comply with the requirements of the California Safe Drinking Water Act, or any regulation, standard, permit or order issued thereunder.

VIOLATION

The State Water Resources Control Board, Division of Drinking Water, (hereinafter Division) hereby issues a citation to the Santa Clara Resources (hereinafter SCR) for the following violation:

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1. Section 64424, Title 22, CCR. Specifically, in July 2016, the SCR failed the TCR MCL Rule, with two positive total coliform results and one positive E.coli result (see table, below).

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Date	Site	Results
07/28/2016	Grolink Lunch Room Tap	Total Coliform Present; E.coli Present
07/28/2016	Top Star Sink	Total Coliform Absent; E.coli Absent
07/28/2016	Sample Station 2	Total Coliform Absent; E.coli Absent
07/28/2016	Sample Station 4	Total Coliform Absent; E.coli Absent
07/28/2016	Dutch Brothers Well 01	Total Coliform <1.0 Absent; E.coli <1.0 Absent
07/29/2016	Sample Station 2	Total Coliform <1.0 Absent; E.coli <1.0 Absent
07/29/2016	Grolink Lunch Room Tap	Total Coliform 3.1 Present; E.coli <1.0 Absent
07/29/2016	Sample Station 4	Total Coliform <1.0 Absent; E.coli <1.0 Absent
07/29/2016	Top Star Sink	Total Coliform <1.0 Absent; E.coli <1.0 Absent
07/29/2016	Dutch Brothers Well 01	Total Coliform <1.0 Absent; E.coli <1.0 Absent

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2. Section 64426 (b), Title 22, CCR. Specifically, failure to notify the Division by the end of the day, or within 24 hours of being notified of the E. coli positive test result.

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BACKGROUND

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SCR is a non-transient, non-community water system that serves approximately 200 people. SCR is a flower production facility and its service area mainly comprises of two facilities, Grolink and Topstar. The domestic water is used to



1 serve restrooms and lunch rooms in these two facilities. SCR's source of
2 domestic water supply consists of one well, the Dutch Brothers Well 01, that has a
3 capacity to produce 500 gallons per minute (GPM). The well serves water to two
4 storage tanks both located on the Grolink facility; a 3100 gallon plastic (poly)
5 storage tank located inside a building, and a 120,000 gallon storage tank located
6 next to a Fire Storage tank. Water from the 120,000 gallon storage tank is
7 delivered to the Topstar facility. SCR has installed a chlorine tablet floater at the
8 3100 gallon poly tank to chlorinate the water that is served to the Grolink facility. A
9 chlorination facility is maintained at the booster pumps station to inject sodium
10 hypochlorite in the pipeline that delivers water to the Topstar facility.
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14 SCR maintains a booster pump station along with an 80 gallon capacity pressure
15 tank to pressurize the one pressure zone system. The SCR does not have a
16 back-up source or connections to any neighboring systems for emergency use.
17 The SCR maintains bottled water obtained from an approved source as its
18 alternate drinking water source for human consumption, with appropriate
19 notification to its employees.
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22 The routine samples should be distribution sample sites representative of water
23 throughout the distribution system. The routine sample sites should not be from
24 sources (e.g. well, spring) or directly near sources. The system shall continue to
25 take bacteriological samples until all results are absent.
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1 Under the Federal Revised Total Coliform Rule that went into effect on April 1,
2 2016, a Level 2 assessment was conducted on August 23, 2016. Per review of
3 the assessment elements, the following items were noted in the report:
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- 7 1. The facility is a flower greenhouse/packing operation where fertilizer is
8 regularly handled.
- 9 2. An employee mentioned he had to temporarily re-plumb the domestic water
10 when a pump failed.
- 11 3. Once a new pump was installed, the domestic plumbing was disconnected
12 from the RO process water.
- 13 4. A backflow device between the domestic system and the fertilizer injection
14 that is not tested.
- 15 5. A domestic water pump failed several days before the July 28, 2016
16 sample, which lead to low pressures.
- 17 6. Every three weeks, the staff must chlorinate the tank for the Grolink
18 restroom; sometimes it is forgotten.
- 19 7. The domestic pump failed, and it took a few days to find a comparable
20 replacement.
- 21 8. Once the new pump was installed, the domestic plumbing was
22 disconnected from the RO process water. It is unknown if the new line was
23 disinfected.
- 24 9. A backflow device between the domestic system and the fertilizer injection
25 has not been tested.
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10. A domestic water pump failed several days before the July 28, 2016 sample was collected, which lead to low pressures.

11. The non-domestic system was connected to the domestic system when the pump failed. Normally, the two systems are separated by an air gap.

12. The screen had been removed from the domestic tank to install a truck fill pipe. The pipe needs to be removed or protected from contamination and the vent needs to be screened.

13. The overflow pipe of the domestic tank does not drain. The pipe was full of water and the end of the pipe points up and was full of green algae/pond scum.

14. The top of the tanks are inaccessible due to lack of adequate ladders. The condition of the top of the reservoir is unknown and must be documented to DDW with pictures.

15. It was reported the water system ran out of water and had to truck water into the tank.

16. The vent was modified to allow truck filling. The screen was not replaced.

17. When the pump failed and the system was connected to the RO, it bypassed the chlorine treatment, leaving the water un-disinfected. Once the new pump was purchased and installed, the domestic plumbing was disconnected from the non-potable system. All the plumbing work was done by an employee who is not a certified operator. It is unknown if the plumbing was properly disinfected.

18. The domestic tank's overflow does not drain and is a source of bacteriological contamination as it is open to the atmosphere at the end of



1 the pipe. There is a cross-connection potential between the overflow pipe
2 and the reservoir. The overflow pipe needs to drain properly or an
3 airgap/backflow prevention device needs to be installed to protect the
4 reservoir from the stagnant water in the overflow.
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6 19. Routine disinfection needs to be provided to the domestic tank. NSF 60
7 approved chlorine shall be used, not pool chlorine.

8 20. The chlorination system at the domestic/fire pump station for Top Star is set
9 up on a timer, not flow paced. This creates slugs of chlorine that was over
10 5 mg/L during the inspection. It could also cause slugs of unchlorinated
11 water if water use occurs during a time when the chlorinator is off. There is
12 minimal use on this system and there is a long detention time between the
13 chlorination and usage. Santa Clara Resources has been failing the
14 Disinfection By-product Rule and needs to re-evaluate the chlorination
15 system to provide a consistent chlorine residual that does not create
16 disinfection by-products over the maximum contaminant level.
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21 **DIRECTIVES**

22 The SCR is hereby directed to take the following actions:

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24 1. Immediately, follow proper TCR routine and repeat sampling/reporting
25 procedures in accordance with Article 3, Title 22, CCR, Sections 64423, 64424,
26 and 64426.
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- 2. Within 30 days of learning of the violation (contacted date of 07/30/16 on lab report), notify the public of the TCR MCL failure by direct delivery and posting in conspicuous public places served by the water system.
- 3. Submit a signed copy of the Proof of Public Notification (attached).
- 4. The SCR system is required to provide continuous chlorination disinfection treatment to the water that enters the distribution system at all times.
- 5. A copy of the notification and certification form shall be submitted to:

Jeff Densmore, P.E., District Engineer
 Division of Drinking Water
 Santa Barbara District
 1180 Eugenia Place, Suite 200
 Carpinteria, CA 93013-2000

Sept, 26, 2016
 Date

[Signature]
 Jeff Densmore, P.E., District Engineer
 Southern California Section
 Santa Barbara District (SWRCB-DDW)



cc: Ventura County Environmental Health
 Ms. Lori Frost, Operator, Applied Backflow Technologies, Inc.

