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STATE OF CALIFORNIA
WATER RESOURCES CONTROL BOARD
DIVISION OF DRINKING WATER

TO: City of Los Angeles Department of Water and Power
Box 51111, Room 1455
Los Angeles, CA 90051

Attn: Mr. James McDaniel
Senior Assistant General Manager, Water System

CITATION FOR VIOLATION OF CALIFORNIA CODE OF REGULATIONS, TITLE
22, SECTIONS 64423.1(b) AND 64426.1 (b) (4)
WATER SYSTEM NO. 1910067
CITATION NO. 04-15-14C-001-1910067-21
Issued on August 6, 2014

Section 116650 of the California Health and Safety Code authorizes the issuance of a citation to a public water system for violation of the California Safe Drinking Water Act (Health and Safety Code, Division 104, Part 12, Chapter 4, commencing with Section 116270) (hereinafter "California SDWA"), or any regulation, standard, permit or order issued or adopted thereunder.

1 The State Water Resources Control Board, acting by and through its Division of
2 Drinking Water (hereinafter "Division") and the Deputy Director for the Division
3 (hereinafter "Deputy Director"), hereby issues a Citation to the City of Los Angeles
4 Department of Water and Power (hereinafter "LADWP"), for failure to comply with
5 Section 64423 and Section 64426 of Title 22, California Code of Regulations (CCR).

6
7 **APPLICABLE AUTHORITIES**

8 **Section 116650 of California Health and Safety Code provides:**

9
10 (a) If the department determines that a public water system is in violation
11 of this chapter or any regulation, permit, standard, citation, or order issued or adopted
12 thereunder, the department may issue a citation to the public water system. The
13 citation shall be served upon the public water system personally or by certified mail.
14 Service shall be deemed effective as of the date of personal service or the date of
15 receipt of the certified mail. If a person to whom a citation is directed refuses to accept
16 delivery of the certified mail, the date of service shall be deemed to be the date of
17 mailing.

18 (b) Each citation shall be in writing and shall describe the nature of the
19 violation or violations, including a reference to the statutory provision, standard, order,
20 citation, permit, or regulation alleged to have been violated.

21 (c) A citation may specify a date for elimination or correction of the
22 condition constituting the violation.

1 (d) A citation may include the assessment of a penalty as specified in
2 subdivision (e).

3 (e) The department may assess a penalty in an amount not to exceed
4 one thousand dollars (\$1,000) per day for each day that a violation occurred, and for
5 each day that a violation continues to occur. A separate penalty may be assessed for
6 each violation.

7

8 **California Code of Regulations, Title 22, Section 64423.1 (b) provides, in**
9 **relevant part:**

10

11 (b) The water supplier shall require the laboratory to notify the supplier
12 within 24 hours, whenever the presence of total coliforms, fecal coliforms or E. coli is
13 demonstrated in a sample or a sample is invalidated due to interference problems,
14 pursuant to Section 64425(b), and shall ensure that a contact person is available to
15 receive these analytical results 24-hours a day. The water supplier shall also require
16 the laboratory to immediately notify the Division of any positive bacteriological results
17 if the laboratory cannot make direct contact with the designated contact person within
18 24 hours.

19

20 **California Code of Regulations, Title 22, Section 64426.1 (b) (4) provides, in**
21 **relevant part:**

22

23 (b) A public water system is in violation of the total coliform MCL when:

1 (4) Any repeat sample following a fecal coliform-positive or E.
2 coli-positive routine sample is total coliform-positive.
3

4 **STATEMENT OF FACTS**

5 LADWP is a community water system that serves approximately 3.9 million people
6 through 697,501 service connections. It is operated under Water Supply Permit No.
7 04-15-08P-003, issued on May 1, 2008, and subsequent permit amendments.
8

9 LADWP conducts Total Coliform Rule (TCR) monitoring in accordance with the
10 approved *Coliform Sample Siting Plan for the City of Los Angeles*, dated June 2008,
11 which was developed pursuant to Title 22, CCR, Section 64422. The sample sites and
12 schedule are arranged to represent all major water quality areas in the distribution
13 system and the estimated population in those areas. The plan includes 203 different
14 sample sites; 140 of them are for weekly samples and 63 are for monthly samples.
15 Thus, anywhere between 623 and 763 routine samples may be collected in a given
16 month.
17

18 Monday, June 23, 2014: LADWP had a total-coliform positive sample at AVENUE53,
19 a weekly TCR location in Highland Park. It was E. coli-negative.
20

21 Tuesday, June 24, 2014: The repeat sample set collected on Tuesday, June 24, had
22 a total-coliform positive result in the downstream sample.
23

1 Wednesday, June 25, 2014: A second repeat sample set was collected and was clear
2 in all three samples. The analysis protocol for the LADWP water quality lab is to run a
3 fecal coliform analysis on any total coliform-positive sample. The fecal coliform test for
4 the original total coliform-positive sample collected on Monday, June 23, was
5 completed on Wednesday, June 25, and was fecal coliform-positive. The analyst did
6 not notify the LADWP Water Quality Control group.

7
8 Monday, June 30, 2014: LADWP water quality personnel became aware of the fecal-
9 positive result on the morning of Monday, June 30, when reviewing results recently
10 entered into the LADWP laboratory information management system (LIMS). LADWP
11 water quality personnel notified the Division that same day.

12
13 System Evaluation and Investigation: LADWP conducted a thorough investigation to
14 determine any potential sources of contamination.

15
16 1) The AVENUE55 sample location receives chloraminated water treated by
17 Metropolitan Water District and purchased at Eagle Rock Reservoir. The
18 dedicated sample tap is in the 778-foot service zone near Highland Park Tank.
19 Highland Park tank was sampled on Monday, June 23 and had a total chlorine
20 residual of 1.7 mg/L. Eagle Rock Reservoir inlet and outlet were also sampled on
21 Monday, June 23. The inlet total chlorine residual was 2.5 mg/L and the outlet total
22 chlorine residual was 2.4 mg/L. The total chlorine residual analyzer at Eagle Rock



- 1 Reservoir outlet showed a stable chlorine residual averaging about 2.3 mg/L.
2 There is no indication of a treatment failure.
- 3 2) Highland Park Tank has nitrified this year. It was treated with breakpoint
4 chlorination on June 9. The total chlorine residual was 1.4 mg/L on June 16, and
5 1.7 mg/L on June 23. Both the June 16 and June 23 samples were below
6 detection for nitrite, so there is no indication that nitrification has returned after the
7 June 9 treatment.
- 8 3) LADWP water quality personnel reviewed the operational data and there was no
9 indication of compromised treatment or distribution system integrity. All TCR
10 samples related to the AVENUE53 location had total chlorine residuals in the
11 range of 1.7 to 2.4 mg/L.
- 12 4) The system pressure was normal and there was no indication that the pressure in
13 the distribution system dropped below normal around the time of the coliform-
14 positive samples.
- 15 5) There have been no instances of main breaks causing pressure below 5 psi in the
16 Eagle Rock Reservoir service area during June. Division personnel conducted a
17 sanitary survey of Highland Park Tank and Eagle Rock Reservoir on July 1, 2014
18 and did not find any significant deficiencies.
- 19 6) The system did not experience any power outages around the time of the incident,
20 and LADWP had not received any reports of customer illness.
- 21 7) LADWP is reviewing its internal notification procedures to determine if changes
22 are needed to prevent this occurrence in the future and will retrain all employees

1 on the notification procedure when this review is complete. The employee who
2 omitted the notification step has been counseled.

3

4 In summary, the full investigation of the total coliform-positive and fecal coliform-
5 positive sample results did not reveal the likely cause of the contamination. Sampling,
6 transportation, and analytical procedures appear to be done properly. Steps are being
7 taken to ensure timely water system notification of coliform-positive results.

8

9

DETERMINATION

10 The Division has determined that LADWP failed to comply with the primary drinking
11 water standard for total coliform bacteria for the month of June 2014. The fecal
12 coliform-positive sample followed by a total coliform-positive sample in the repeat
13 sample set constitutes a violation of Section 64426.1 (b) (4). The failure of the
14 laboratory to notify the water supplier within 24 hours of receiving the fecal coliform-
15 positive result constitutes a violation of Section 64423.1(b).

16

17

DIRECTIVES

18 LADWP is hereby directed to take the following actions:

19

- 20 1. Because of the coliform-absent sample set collected after the initial positive
21 results, Section 64463.4, Title 22, CCR, regarding Tier 2 Public Notice, will be
22 utilized for the failure to meet the total coliform rule MCL. By **July 29, 2014**,
23 LADWP shall provide Tier 2 public notification by mail or direct delivery to each

1 customer in the service area affected by the Total Coliform Rule MCL violation;
2 i.e., in the 778-foot service zone (hereinafter, 'zone'). Attachment A contains
3 the Tier 2 MCL violation notice prepared by LADWP. The notice includes all
4 mandatory language specified by the regulation. Notice shall be provided to all
5 customers in this zone that receive a bill, including those that provide their
6 drinking water to others (e.g., schools or school systems, apartment building
7 owners, or large private employers), and other service connections in this zone
8 to which water is delivered by the water system. In addition, LADWP shall use
9 one or more of the following methods to reach persons in this zone not likely to
10 be reached by the a mailing or direct delivery (renters, university students,
11 nursing home patients, prison inmates, etc.): (1) publication in a local
12 newspaper or newsletter distributed to customers; (2) e-mail message to
13 employees or students; (3) posting on the Internet or intranet; or (4) direct
14 delivery to each customer.

- 15
- 16 2. By **August 12, 2014**, LADWP shall provide proof of notification by submittal of
17 the necessary form (Attachment B) with a copy of the distributed notice to the
18 Division. The certification of notification must identify the number of notices
19 posted, the locations where the notices were posted, and how long the notices
20 were posted.

21

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

4
5 Nothing in this Citation relieves LADWP of its obligation to meet the requirements of
6 the California Safe Drinking Water Act, or of any regulation, permit, standard, or order
7 issued or adopted thereunder.

8
9 All submittals required by this Citation shall be submitted to the Division at the
10 following address:

11
12 Chi Diep
13 District Engineer
14 State Water Resources Control Board
15 Division of Drinking Water
16 500 North Central Avenue, Suite 500
17 Glendale, CA 91203
18

19 **PARTIES BOUND**

20 This Citation shall apply to and be binding upon LADWP, its officers, directors,
21 shareholders, agents, employees, contractors, successors, and assignees.

22
23 **SEVERABILITY**

24 The Directives of this Citation are severable, and LADWP shall comply with each and
25 every provision thereof, notwithstanding the effectiveness of any other provision.

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FURTHER ENFORCEMENT ACTION

The California SDWA authorizes the Division to: issue 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 permit, regulation, permit 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 Division to 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 an order of the Division; 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 Division. The Division does not waive any further enforcement action by issuance of this citation.

August 6, 2014

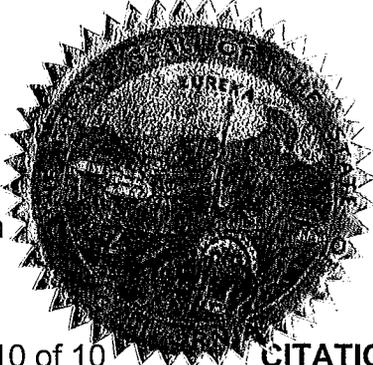
Date



Chi Diep, P.E.
District Engineer
Division of Drinking Water
State Water Resources Control Board

Attachments:

- A: LADWP Tier 2 Notice
- B: Form for Proof of Notification



ATTACHMENT A

Public Notification

Total Coliform Rule MCL Exceedance

Los Angeles  Department of Water & Power

ERIC GARCETTI
Mayor

Commission
MEL LEVINE, *President*
WILLIAM W. FUNDERBURK JR., *Vice President*
JILL BANKS BARAD
MICHAEL F. FLEMING
CHRISTINA E. NOONAN
BARBARA E. MOSCHOS, *Secretary*

MARCIE L. EDWARDS
General Manager

July 18, 2014

Dear LADWP Customer:

AN IMPORTANT NOTICE ABOUT YOUR DRINKING WATER

This is not an emergency

You do not need to boil your water or take any action

You do not need to use an alternate water supply, such as bottled water

The Los Angeles Department of Water and Power (LADWP) collects and tests water constantly throughout the City to ensure that the 500 million gallons of water served daily to our customers is of the highest quality at all times. We do this in accordance with water quality regulations that are set by federal and state regulatory agencies. When a regulatory violation occurs, public notification may be required.

You are receiving this public notification because, on June 23, 2014, a water sample taken in the northeast area of the City of Los Angeles tested positive for total and fecal coliforms. Coliforms are bacteria that are naturally present in the environment and are used as an indicator, or warning, that other potentially-harmful bacteria may be present. Coliforms were found in more samples than allowed and this was a warning of potential problems. **Follow-up tests were conducted by LADWP Water Quality personnel and all test results were negative on June 25, 2014 and thereafter.**

While the sampling results exceeded the standard for Total Coliforms, the State Water Resources Control Board Division of Drinking Water (SWRCB-DDW) has determined that public health and welfare was not adversely affected by this occurrence because there was adequate chlorine disinfection levels in all samples collected and no *E. coli* (a potentially harmful form of bacteria) were found. The general area affected included portions of Eagle Rock, Highland Park and Hermon neighborhoods (see attached map).

Additional Details

Following the initial detection on June 23, 2014, three follow up samples were collected in this area on June 24, 2014, according to the requirements of the Total Coliform Rule (TCR, 1989) by the United States Environmental Protection Agency (USEPA). One of the three samples

Los Angeles Aqueduct Centennial Celebrating 100 Years of Water 1913-2013

111 N. Hope Street, Los Angeles, California 90012-2607 Mailing address: Box 51111, Los Angeles, CA 90051-5700
Telephone: (213) 367-4211 www.LADWP.com

indicated the presence of total coliforms. Combined, these occurrences were deemed to be a violation of the Maximum Contaminant Level (MCL) for total coliforms which requires public notification of the impacted area. The TCR requires repeat daily sampling at the locations where coliforms are detected until all sample test results are negative, indicating no presence of total or fecal coliforms.

LADWP has not yet identified a likely cause of this incident, but will continue to investigate and monitor water quality closely to ensure the safety of the water provided to you. We take over 600 samples each month to ensure biological safety across the City of Los Angeles and an incident of this kind is extremely rare. Be assured, we are taking every possible step to monitor the safety of your drinking water and continue to take steps to ensure it meets and exceeds all water quality standards.

Additional Information about Coliform Bacteria and this Incident:

Fecal coliforms and *E. coli* are bacteria whose presence indicates that the water may be contaminated with human or animal wastes. Microbes in these wastes can cause short-term effects, such as diarrhea, cramps, nausea, headaches, or other symptoms. They may pose a special health risk for infants, young children, some of the elderly, and people with severely compromised immune systems.

For questions or more information, please contact LADWP Water Quality Customer Service at 213-367-3182.

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.

This notice was jointly developed with SWRCB-DDW staff and approved for public distribution.

This Message is for Non-English Speaking LADWP Customers

This report contains important information about your drinking water. If you have any questions regarding this report, please contact us at (213) 367-3182.

Spanish

Este informe contiene información importante sobre su agua potable. Si tiene alguna pregunta sobre este informe, por favor comuníquese con nosotros llamando al (213) 367-3182.

Farsi (Persian)

این اطلاعیه شامل اطلاعات مهمی راجع به آب آ شامیدنی است. اگر تمیتوانید این اطلاعات را بزبان انگلیسی بخوانید لطفاً از کسی که میتواند یاری بگیرد تا مطالب را برای شما به فارسی ترجمه کند.

French

Cé rapport contient des information importantes concernant votre eau potable. Veuillez traduire, ou parlez avec quelqu' un qui peut le comprendre.

Tagalog

Mahalaga ang impormasyong ito. Mangyaring ipasalin ito.

Greek

Η κατοθεν αναφορα παρουσιαζει σπουδαιες πληροφορειες για το ποσιμο νερο σας. Πρακακλω να το μεταφρασετε η να το σξολειασετε με καποιον που το καταλαβαινει απολητως.

Gujarati

આ અહેવાલ આપના પીવાના પાણી વિશે અગત્યની માહિતી ધરાવે છે. તેનું ભાષાંતર કરો, અથવા તે સમજી શકે તેવી કોઈ વ્યક્તિ સાથે વાત કરો.

Hebrew

הדו"ח הזה מכיל מידע חשוב לגבי מי השתייה שלך. תרגם את הדו"ח או דבר עם מישהו שמבין אותו.

Hindi

यह सूचना महत्वपूर्ण है ।
कृपा करके किसी से :सका अनुवाद करायें ।

Hungarian

Ez a jelentés fontos információt tartalmaz az Ön által fogyasztott ivóvízről. Fordítsa le, vagy beszéljen valakivel, aki megérti

Italian

Questo rapporto contiene informazioni importanti che riguardano la vostra acqua potabile. Traducetelo, o parlate con una persona qualificata in grado di spiegarvelo.

Japanese

この情報は重要です。
翻訳を依頼してください。

Arabic

”هذا التقرير يحتوي على معلومات مهمة تتعلق بمياه الشفة (أو الشرب).
ترجم التقرير، أو تكلم مع شخص يستطيع أن يفهم التقرير.“

Yiddish

דער רעפארט גיט איבער וויכטיקע אינפארמאציע וועגן אייער טרינקוואסער.
עצט עס איבער, אָדער רעדט מיט עמעצן וואָס קען עס פֿאַרשטיין.

Khmer (Cambodian)

របាយការណ៍នេះមានព័ត៌មានសំខាន់ៗអំពីទឹកបរិភោគ ។ សូមបកប្រែប្រតិប្រតោះជាមួយអ្នកដែលមើលយល់
របាយការណ៍នេះ ។

Korean

이 안내는 매우 중요합니다.
본인을 위해 번역인을 사용하십시오.

Polish

Ta broszura zawiera wazne informacje dotyczace jakosci wody do picia. Przetlumacz zawartosc tej broszury lub skontaktuj sie z osoba ktora pomoze ci w zrozumieniu zawartych informacji.

Portuguese

Este relatório contém informações importantes sobre a água que você bebe. Traduza-o ou converse a respeito dele com alguém que entenda o documento.

Russian

Этот отчет содержит важную информацию о вашей питьевой воды. Переведите его или поговорите с тем, кто это понимает.

Serbo-Croatian

Ovaj izvještaj sadrži važne informacije o pitnoj vodi. Prevedite ga ili neka vam netko ko razumije jezik, pročita i objasni.

German

Dieser Bericht enthält wichtige Information über Ihr Trinkwasser. Bitte übersetzen Sie ihn oder sprechen Sie mit jemandem, der ihn versteht.

Urdu

اس رپورٹ میں آپ کے پینے کے پانی کے بارے میں اہم معلومات ہے۔ اس کا ترجمہ کریں، یا کسی ایسے شخص سے بات کریں جو اسے سمجھ سکے۔

Vietnamese

Chi tiết này thật quan trọng.
Xin nhờ người dịch cho quý vị.

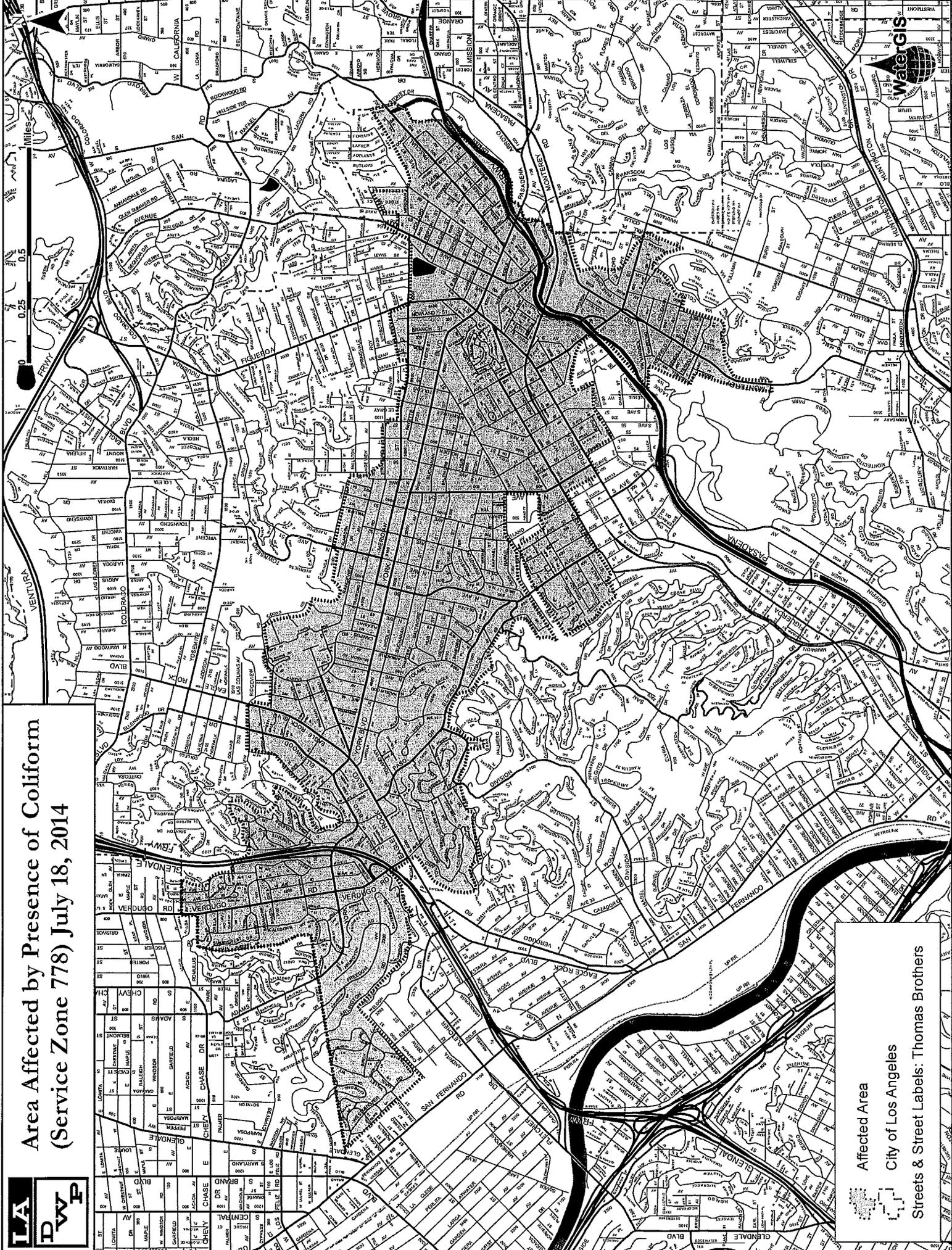
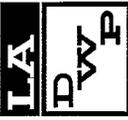
Armenian

Այս հաշվետվությունը պարունակում է կարևոր տեղեկատվություն ձեր խմելու ջրի մասին:
Թարգմանե՛ք այն, կամ խոսե՛ք որևէ մեկի հետ, ով հասկանում է դրա բովանդակությունը:

Chinese

此份有关你的食水报告,内有重要资料和讯息,请找他人替你翻译及解释清楚。

Area Affected by Presence of Coliform
(Service Zone 778) July 18, 2014



Affected Area
City of Los Angeles
Streets & Street Labels: Thomas Brothers



ATTACHMENT B

Proof of Notification

PROOF OF NOTIFICATION

Name of Water System: **Los Angeles Department of Water and Power**

System Number: 1910167

**Certification of Notification for
Total Coliform MCL and Notification Violations**

As required by *California Code of Regulations*, Title 22, Section 64463.4, *Tier 2 Public Notice*, I notified the users of the water supplied by the Los Angeles Department of Water and Power in the 778-foot service zone near Highland Park Tank of the violations of Section 64423.1 (b) and Section 64426.1 (b) (4), Title 22, *California Code of Regulations*. I complied with the requirement to conduct public notification as indicated below:

<u>Required Action (indicate all that were used)</u>	<u>Date Completed</u>
Public Notification – Hand Delivery	<input type="text"/>
Public Notification - Mail Delivery	<input type="text"/>
Public Notification – Continuous Posting	<input type="text"/>
Public Notification - Consumer Confidence Report	<input type="text"/>
Public Notification - Other method Specify other method used: _____	<input type="text"/>

Signature of Water System Representative

Date

ATTACH A COPY OF THE NOTICE USED.

**THIS FORM MUST BE COMPLETED AND RETURNED TO
THE DIVISION OF DRINKING WATER**