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STATE OF CALIFORNIA
WATER RESOURCES CONTROL BOARD
DIVISION OF DRINKING WATER

IN RE: City of Torrance
20500 Madrona Avenue
Torrance, CA 90503

TO: Mr. Robert J. Beste, Deputy Public Works Director
City of Torrance

**CITATION FOR VIOLATION OF CALIFORNIA CODE OF REGULATIONS, TITLE 22,
SECTION 64449 (a) - WATER SYSTEM NO. 1910213
CITATION NO. 04_22_14C_005
Issued on October 2, 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.

The State Water Resources Control 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 citation to the City of Torrance (hereinafter, City) (mailing address: 20500 Madrona Ave, Torrance, CA 90503) for the violation of California Code of Regulations, Title 22, Section 64449 (a).

1 APPLICABLE AUTHORITIES

2

3 Section 116650 of Health and Safety Code provides:

4

5 116650. Citations

6

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

15

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

19

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

22

23 (d) *A citation may include the assessment of a penalty as specified in subdivision*
24 *(e).*

25

26 (e) *The Department may assess a penalty in an amount not to exceed one thousand*
27 *dollars (\$1,000) per day for each day that a violation occurred, and for each day*

Table 64449-B
Secondary Maximum Contaminant Levels
“Consumer Acceptance Contaminant Level Ranges”

Constituent, Units	Maximum Contaminant Level Ranges		
	Recommended	Upper	Short Term
Total Dissolved Solids, mg/L or	500	1,000	1,500
Specific Conductance, μ S/cm	900	1,600	2,200
Chloride, mg/L	250	500	600
Sulfate, mg/L	250	500	600

(b) Each community water system shall monitor its groundwater sources or distribution system entry points representative of the effluent of source treatment every three years and its approved surface water sources or distribution system entry points representative of the effluent of source treatment annually for the following:

- (1) Secondary MCLs listed in Tables 64449-A and 64449-B; and
- (2) Bicarbonate, carbonate, and hydroxide alkalinity, calcium, magnesium, sodium, pH, and total hardness.

(c) If the level of any constituent in Table 64449-A exceeds an MCL, the community water system shall proceed as follows:

- (1) If monitoring quarterly, determine compliance by a running annual average of four quarterly samples;
- (2) If monitoring less than quarterly, initiate quarterly monitoring and determine compliance on the basis of an average of the initial sample and the next three consecutive quarterly samples collected;
- (3) If a violation has occurred (average of four consecutive quarterly samples exceeds an MCL), inform the Department when reporting pursuant to Section 64469;

1 (4) After one year of quarterly monitoring during which all the results are below the
2 MCL and the results do not indicate any trend toward exceeding the MCL, the
3 system may request the Department to allow a reduced monitoring frequency.
4

5 **STATEMENT OF FACTS**
6

7 The City is bounded by the city of Carson on the east, the cities of Gardena and
8 Lawndale on the north, the city of Redondo Beach on the west and the cities of Palos
9 Verdes Estates, Rolling Hills Estates, and Lomita on the south. The service area of
10 the City's water system, covering approximately 75 percent of the land within the City
11 limits, is 16.2 square miles. The City's water supply system currently consists of two
12 active wells, five connections with the Metropolitan Water District of Southern
13 California (MWD), three storage reservoirs and five booster stations. The City also
14 maintains connections with two other water systems (California Water Service
15 Company – Dominguez and the City of Lomita) that either buy or sell water from/to the
16 City. The City serves approximately 115,000 people through 25,859 service
17 connections.

18
19 The City is currently operating its water system under a domestic water supply permit
20 (04-07-94P-001) issued by the Division on January 26, 1994 and five permit
21 amendments issued on December 7, 2001, December 19, 2006, August 17, 2008,
22 January 18, 2011, and May 25, 2012.

23
24 Permit Amendment No. 1910213PA-003 was issued to the City on January 18, 2011,
25 allowing the City to operate Well 9 and the associated treatment facilities. Since
26 February 2011, the City has been injecting CarusTM 8500 into the water produced by
27 Well 9 for iron and manganese sequestration and corrosion control. Condition 21 of

1 the above permit amendment states, "The phosphate addition for iron and manganese
2 sequestration does not constitute a removal treatment. If the water produced by Well
3 9 does not comply with the secondary MCLs for iron or manganese, the City shall
4 provide removal treatment, pursue a waiver, or remove the well from service".
5

6 Section 64449 (c) of the Title 22, CCR requires that if the level of any constituent in
7 Table 64449-A of the Title 22, CCR exceeds the MCL, a community water system
8 must proceed to monitor the constituent quarterly and determine compliance by the
9 running annual average of four consecutive quarterly samples.
10

11 As part of the monitoring program for the phosphate addition treatment, the City has
12 been monitoring Well 9 every quarter for iron and manganese. Since January 2011,
13 manganese levels in Well 9 have ranged from 0.033 mg/L to 0.058 mg/L (Attachment
14 A).
15

16 Wednesday, July 30, 2014

17 The City collected its routine quarterly manganese sample from Well 9.
18

19 Thursday, August 14, 2014

20 The City received the July 30, 2014 manganese sampling result (0.054 mg/L) from the
21 contract laboratory. Mr. Fred Molina, the Senior Water Operator with the City, called
22 the Division to notify that the running annual average of four consecutive quarterly
23 manganese samples was 0.0555 mg/L and exceeded the MCL.
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1 Monday, September 15, 2014

2 The Division received the City's August 2014 Monthly Report, confirming that the
3 average of four consecutive quarterly samples for manganese had exceeded the MCL
4 in Well 9 (Attachment B).

5

6 Section 64449 (a) of the Title 22, CCR specifically requires that the secondary MCLs
7 not to be exceeded in the water supplied to the public by community water systems.

8 The running annual average of manganese samples collected from Well 9 from the
9 fourth quarter of 2013 through the third quarter of 2014 exceeded the MCL of 0.05
10 mg/L (Attachment C). The City has, therefore, violated the secondary MCL for
11 manganese.

12

13 **DETERMINATIONS**

14

15 The Division has determined that the City is in violation of Sections 64449 (a) of Title
16 22, California Code of Regulations due to the average of four consecutive quarterly
17 manganese samples collected from Well 9 during the last quarter of 2013 and the first
18 three quarters of 2014 exceeded the MCL of 0.05 mg/L.

19

20 **DIRECTIVES**

21

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

23

24 I) Complete one of the three actions listed below:

25

26 1. **Within 60 days of receipt of this citation**, submit plans and a time schedule
27 to provide manganese removal treatment for Well 9 for review and approval by

1 the Division. Major milestones, such as completion dates for the preliminary
2 design, final design, construction, permit amendment package submittal, must
3 be included. The time schedule, when approved, shall become requirements of
4 this citation.

5
6 2. Apply for a waiver in accordance with the provisions and requirements of Title
7 22, California Code of Regulation (CCR), Section 64449.2. If the City decides
8 to apply for a waiver:

9
10 a. **On or before September 30, 2015**, the City shall conduct and submit a
11 study to the Division that includes the following: 1) the water system
12 complaint log, maintained pursuant to Section 64470(a), along with any
13 other evidence of customer dissatisfaction, such as a log of calls to the
14 county health Department; 2) an engineering report, prepared by an
15 engineer registered in California with experience in drinking water treatment,
16 that evaluates all reasonable alternatives and costs for bringing the water
17 system into MCL compliance and includes a recommendation for the most
18 cost-effective and feasible approach; 3) the results of a customer survey
19 distributed to all the water system's billed customers that has first been
20 approved by the Division, and 4) a brief report (agenda, list of attendees,
21 and transcript) of a public meeting held by the water system to which
22 customers have been invited, and at which both the tabulated results of the
23 customer survey and the engineering report have been presented with a
24 request for input from the public.

25
26 b. **Within 60 days of receipt of the citation**, the City shall submit a plan and
27 a time schedule for the waiver study to the Division for review and approval.

1 The engineering report, customer survey questionnaire, tabulate results of
2 customer survey and public meeting notice shall be submitted to the
3 Division for review and approval prior to be disseminated to the customers.
4 The plan shall specify the method of disseminating the engineering report,
5 the questionnaire and public meeting notice. Major milestones, such as
6 completion dates for the engineering report, customer survey questionnaire,
7 customer survey, public hearing notice and public hearing shall be included.
8 Unless 50 percent or more of the billed customers respond to the survey,
9 the City shall conduct another survey within three months from the date of
10 the survey by sending the survey out to either all the customers again, or
11 only the customers that did not respond to the survey. The City shall not be
12 eligible for a waiver until it achieves at least a 50 percent response rate on
13 the survey. The City shall allow sufficient time for conducting a follow-up
14 survey, if necessary. The time schedule, when approved, shall become
15 requirements of this citation.

16
17 3. Remove Well 9 from service.

18
19 II) If the City chose the waiver option listed above, but the City's customers were in
20 favor of manganese removal treatment for Well 9, the City shall submit a plan and
21 a schedule to provide manganese removal treatment at Well 9 by September 30,
22 2015.

23
24 III) Beginning January 1, 2015 and quarterly thereafter, the City shall submit a
25 report on the progress in achieving compliance with the foregoing directives.
26
27

1 IV) Prior to the completion of the installation and operation of the manganese
2 treatment facility or obtaining a waiver from the Division, the City must notify its
3 customers in the quarters that Well 9 is in violation of the secondary manganese
4 MCL. In addition, the City must report the manganese secondary MCL violation in
5 the 2014 Consumer Confidence Report in accordance with Section 64481 of the
6 CCR.

7

8 V) **Within 15 days of receiving this citation**, the City must submit a letter to the
9 Division indicating the City's selection of the path to achieve compliance and the
10 City's commitment to comply with the requirements as set forth.

11

12 The Division reserves the right to make modifications to this Citation, as it may deem
13 necessary to protect public health and safety. Such modifications may be issued as
14 amendments to this Citation and shall be effective upon issuance.

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16 Nothing in this Citation relieves the City of its obligation to meet the requirements of
17 California SDWA, or any regulation, permit, standard or order issued or adopted
18 thereunder.

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1 All submittals required by this Citation, shall be submitted to the Division at the
2 following address:

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Shu-Fang Orr, P.E.
District Engineer, Angeles District
State Water Resources Control Board
Division of Drinking Water
500 N. Central Avenue, Suite 500
Glendale, CA 91203

10

11 **PARTIES BOUND**

12

13 This Citation shall apply to and be binding upon the City, its officers, managers,
14 agents, employees, contractors, successors and assignees

15

16 **SEVERABILITY**

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18 The directives of this Citation are severable, and the City shall comply with each and
19 every provision thereof notwithstanding the effectiveness of any provision.

20

21 **FURTHER ENFORCEMENT ACTION**

22

23 The California SDWA authorizes the Division to: issue citation with assessment of
24 administrative penalties to a public water system for violation or continued violation of
25 the requirements of the California SDWA or any permit, regulation, permit or order
26 issued or adopted thereunder including, but not limited to, failure to correct a violation
27 identified in a citation or compliance order. The California SDWA also authorizes the

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1 Division to take action to suspend or revoke a permit that has been issued to a public
2 water system if the system has violated applicable law or regulations or has failed to
3 comply with an order of the Division; and to petition the superior court to take various
4 enforcement measures against a public water system that has failed to comply with an
5 order of the Division. The Division does not waive any further enforcement action by
6 issuance of this citation.

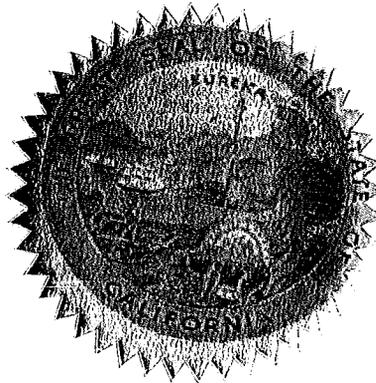
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October 2, 2014

Date

Shu-Fang Orr

Shu-Fang Orr, P.E.
District Engineer, Angeles District
Division of Drinking Water
State Water Resources Control Board



Attachments (3):

- A. Printout of Well 9 Manganese Monitoring Data from the Division's Database
- B. City of Torrance August 2014 Monthly Report
- C. Well 9 Quarterly Compliance Monitoring Data Summary (2011-2014)

BY CERTIFIED MAIL NO. 7012 3460 0002 3404 3890

**Printout of Well 9 Manganese Monitoring Data from the Division's
Database**

DATE: 09/22/14
REPORT: R-040/2-3

STATE OF CALIFORNIA
DRINKING WATER PROGRAM

PAGE: 1

DRINKING WATER ANALYSES RESULTS REPORT
ALL SAMPLES FOR SELECTED CONSTITUENTS - ALL RESULTS
FOR SAMPLE DATE RANGE OF 19940101 THRU 20140922
REPORT OF COUNTY: 19 LOS ANGELES

SYSTEM NO: 1910213 NAME: TORRANCE-CITY, WATER DEPT.
SOURCE NO: 016 NAME: WELL 09

COUNTY: LOS ANGELES
PSCODE: 1910213-016

CLASS: LGLJ STATUS: AR

GROUP IDENTIFICATION	SAMPLE DATE	RESULT *	MCL	DLR	TRIGGER	UNIT

GP SECONDARY/GP						
01055 MANGANESE	01/14/2011	33.0000	50.0000	20.0000	50.0000	UG/L
01055 MANGANESE	08/22/2011	54.0000 *	50.0000	20.0000	50.0000	UG/L
01055 MANGANESE	11/22/2011	56.0000 *	50.0000	20.0000	50.0000	UG/L
01055 MANGANESE	02/28/2012	55.0000 *	50.0000	20.0000	50.0000	UG/L
01055 MANGANESE	05/29/2012	54.0000 *	50.0000	20.0000	50.0000	UG/L
01055 MANGANESE	08/09/2012	53.0000 *	50.0000	20.0000	50.0000	UG/L
01055 MANGANESE	11/15/2012	50.0000 *	50.0000	20.0000	50.0000	UG/L
01055 MANGANESE	02/12/2013	57.0000 *	50.0000	20.0000	50.0000	UG/L
01055 MANGANESE	05/21/2013	52.0000 *	50.0000	20.0000	50.0000	UG/L
01055 MANGANESE	07/23/2013	50.0000 *	50.0000	20.0000	50.0000	UG/L
01055 MANGANESE	10/24/2013	53.0000 *	50.0000	20.0000	50.0000	UG/L
01055 MANGANESE	02/05/2014	58.0000 *	50.0000	20.0000	50.0000	UG/L
01055 MANGANESE	04/22/2014	57.0000 *	50.0000	20.0000	50.0000	UG/L
01055 MANGANESE	07/30/2014	54.0000 *	50.0000	20.0000	50.0000	UG/L

NOTE1: * = RESULT IS EQUAL TO OR GREATER THAN TRIGGER
NOTE2: .000 = RESULT WAS REPORTED AS NON-DETECTED EXCEPT FOR RAD

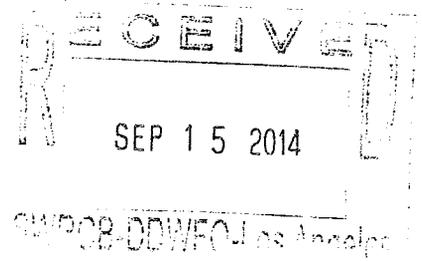
City of Torrance August 2014 Monthly Report

**CITY OF TORRANCE
WATER QUALITY MONITORING FOR BLENDED PHOSPATES WELL 9 LAB RESULTS**

MONTH: August YEAR: 2014

DISTRIBUTION SYSTEM

Weekly Monitoring	Location: W90-1713 Street				
	Week 1	Week 2	Week 3	Week 4	Week 5
Date	8/7/14	8/13/14	8/18/14	8/27/14	
Turbidity (NTU)	0.6	0.73	0.54	0.52	
Color (CU)	<5	<5	<5	<5	
Taste/Odor (TON)	NO	NO	NO	NO	
Total Chlorine (mg/L)	1.92	1.5	0.61	1.34	
Temperature (°C)	25	24	25	27	
pH	8.04	7.94	7.98	8.06	
Orthophosphate (mg/L)	1.18	1.1	1.18	1.14	



Weekly Monitoring	Location: 3000 E. Grand Avenue Blvd				
	Week 1	Week 2	Week 3	Week 4	Week 5
Date	8/7/14	8/13/14	8/18/14	8/27/14	
Turbidity (NTU)	0.65	0.45	0.65	0.61	
Color (CU)	<5	<5	<5	<5	
Taste/Odor (TON)	NO	NO	NO	NO	
Total Chlorine (mg/L)	1.31	1.15	0.56	0.46	
Temperature (°C)	26	26	26	27	
pH	7.99	7.89	7.95	7.94	
Orthophosphate (mg/L)	1.2	1.14	1.14	1.18	

WELL SITE

Quarterly Monitoring	Location: Well 9				
	1st Quarter	2nd Quarter	3rd Quarter	4th Quarter	Average
Date	10/24/2013	2/5/2014	4/22/2014	7/30/2014	
Iron (ppb)	0	0	0	0	0.0
Manganese (ppb)	53	58	57	54	55.5

Weekly Monitoring	Location: Well 9 Station					Monthly Monitoring	Location: Well 9 Station
	Week 1	Week 2	Week 3	Week 4	Week 5		
Date	8/7/14	8/13/14	8/18/14	8/27/14		Date	7-Aug
pH	7.8	8	7.9	8		Color (CU)	<5
Orthophosphate (mg/L)	0.91	0.9	0.91	0.94			

Comments:

Completed by: Fred Moore

Date: 9/8/2014

**Well 9 Historical Quarterly Compliance Monitoring Data Summary
(2011 – 2014)**

Type of Sampling	Date of Monitoring	Quarterly Result (mg/L)	Running Annual Average (mg/L)
3 rd Quarter of 2011	08/22/2011	0.054	-
4 th Quarter of 2011	11/22/2011	0.056	-
1 st Quarter of 2012	02/28/2012	0.055	-
2 nd Quarter of 2012	05/29/2012	0.054	0.0548
3 rd Quarter of 2012	08/09/2012	0.053	0.0545
4 th Quarter of 2012	11/15/2012	0.050	0.0530
1 st Quarter of 2013	02/12/2013	0.057	0.0535
2 nd Quarter of 2013	05/21/2013	0.052	0.0530
3 rd Quarter of 2013	07/23/2013	0.050	0.0523
4 th Quarter of 2013	10/24/2013	0.053	0.0530
1 st Quarter of 2014	02/05/2014	0.058	0.0533
2 nd Quarter of 2014	04/22/2014	0.057	0.0545
3 rd Quarter of 2014	07/30/2014	0.054	0.0555