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

**IN RE:** Land Projects Mutual Water Company  
8810 West Avenue E-8  
Lancaster, CA 93536

**TO:** Mr. John Houghton  
General Manager

**COMPLIANCE ORDER  
FOR  
VIOLATION OF THE ARSENIC MAXIMUM CONTAMINANT LEVEL  
WATER SYSTEM NO. 1910246  
COMPLIANCE ORDER NO. 04\_07\_15R\_001  
ISSUED ON FEBRUARY 2, 2015**

Section 116655, Chapter 4 of the California Health and Safety Code authorizes the issuance of an Order for failure to comply with a requirement of the California Safe Drinking Water Act, or any regulation, standard, permit, or order issued thereunder.

**FINDINGS**

**BACKGROUND**

The Land Projects Mutual Water Company (hereinafter, Company) operates a community water system that serves a population of approximately 1,500 through 535 residential and 4 commercial service connections within the Antelope Acres area in Lancaster, which is located in the northerly portion of Los Angeles County. The Company has been operating its water system under the authority of a water supply permit (Permit No. 73-035) issued by the Division of Drinking Water (hereinafter,



1 Division) on November 2, 1973 and a permit amendment (Permit Amendment No.  
2 1910246PA-001) issued by the Division on October 4, 2009.

3  
4 The active sources of water supply for the Company consist of three active wells,  
5 Wells 1, 3 and 8 with a capacity of 400 gallons per minute (gpm), 580 gpm, and 1,000  
6 gpm, respectively. The water produced by the wells is chlorinated with a 12 percent  
7 liquid sodium hypochlorite solution for precautionary purposes. There are two steel  
8 tank reservoirs in the system: Tanks 4 and 5 with storage capacity of 0.03 million  
9 gallons (MG) and 0.53 MG, respectively. The Company maintains approximately 40  
10 psi in its distribution system and does not have an interconnection with another water  
11 system.

#### 12 13 ENFORCEMENT HISTORY

14 In the first quarter of 2008, the Company violated the Federal MCL for arsenic of  
15 0.010 mg/L. The Division issued a Notice of Violation to the Company on May 23,  
16 2008. In November 2008, the State adopted the Federal arsenic MCL. On January 6,  
17 2009, the Division issued a Compliance Order (Compliance Order No. 04-07-09CO-  
18 01) to the Company. Per the Compliance Order, the Company was required to follow  
19 through on its application to secure a loan through the Safe Drinking Water State  
20 Revolving Fund (SDWSRF) and stay on course with the Division's SDWSRF process  
21 until compliance with the arsenic MCL could be achieved. In order to obtain money  
22 through the SDWSRF, the Company would have been required to increase its water  
23 rates in order to repay the loan. However, the Company was not in agreement with  
24 this requirement and as a result, the Company's Board passed a motion in its January  
25 10, 2012 meeting to stop pursuing funding. On April 18, 2012, the Division issued a  
26 Citation to the Company for failing to comply with the maximum contaminant level  
27 (MCL) of 0.010 mg/L for arsenic in the fourth quarter of 2011 and failing to continue



1 with the Division's Safe Drinking Water State Revolving Fund (SDWSRF) process until  
2 compliance with the arsenic MCL could be achieved.

3

4 WATER QUALITY OF SOURCES

5 On April 25, 2014, the Company reactivated Well 1. The arsenic concentrations for  
6 Well 1 are currently in the range of 0.011 mg/L and 0.013 mg/L. The arsenic running  
7 annual average for Well 3 has exceeded the MCL of 0.010 mg/L since the first quarter  
8 of 2008. The Company did not use Well 3 between December 2009 and March 2014.  
9 Well 3 was used for a period of two weeks in the second quarter of 2013 and from the  
10 second quarter of 2014 to October 10, 2014. Well 3 was out of service since October  
11 10, 2014 to now. Well 8 was drilled in April 2009 and was permitted for use in  
12 October 2009. Water produced from Well 8 met the arsenic standard until the fourth  
13 quarter of 2011. The Company uses Well 8 as main source of water supply. Table 1,  
14 as shown below, lists the quarterly arsenic sampling results (in mg/L) as well as the  
15 calculated running annual averages for Wells 1, 3, and 8.

16

17 The Company has conducted quarterly Tier 2 public notification to its customers for  
18 violating the arsenic MCL in 2008, 2009, the fourth quarter of 2011, 2012, 2013 and  
19 2014. The Company did not conduct public notification for 2010 and the first three  
20 quarters of 2011 since the water delivered to its customers during these time frames  
21 met the arsenic standard. Table 1 also lists the quarterly Tier 2 arsenic MCL public  
22 notification conducted by the Company.

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Table 1. Quarterly and RAA Arsenic Concentrations, Tier 2 Public Notification

Sampling Date	Well 1		Well 3		Well 8		Tier 2 PN
	Q	RAA	Q	RAA	Q	RAA	
2 <sup>nd</sup> Q of 2007			0.020				
3 <sup>rd</sup> Q of 2007			0.013				
4 <sup>th</sup> Q of 2007			NS				
1 <sup>st</sup> Q of 2008			0.017	0.017			Yes
2 <sup>nd</sup> Q of 2008			0.013	0.014			Yes
3 <sup>rd</sup> Q of 2008			OOS	---			Yes
4 <sup>th</sup> Q of 2008			NS	0.015			Yes
1 <sup>st</sup> Q of 2009			0.027	0.020			Yes
2 <sup>nd</sup> Q of 2009			0.013	0.020			Yes
3 <sup>rd</sup> Q of 2009			0.014	0.018			Yes
4 <sup>th</sup> Q of 2009			0.015	0.017	0.008		Yes
1 <sup>st</sup> Q of 2010			OOS	---	0.009		No
2 <sup>nd</sup> Q of 2010			OOS	---	0.007		No
3 <sup>rd</sup> Q of 2010			0.025*	0.020	0.009	0.008	No
4 <sup>th</sup> Q of 2010			0.015*	0.020	0.007	0.008	No
1 <sup>st</sup> Q of 2011			0.018*	---	0.008	0.008	No
2 <sup>nd</sup> Q of 2011			0.013*	---	0.008	0.008	No
3 <sup>rd</sup> Q of 2011			0.013*	---	0.014	0.009	No
4 <sup>th</sup> Q of 2011			0.014*	---	0.014	0.011	Yes
1 <sup>st</sup> Q of 2012			0.013*	---	0.015	0.013	Yes
2 <sup>nd</sup> Q of 2012			0.014*	---	0.017	0.015	Yes
3 <sup>rd</sup> Q of 2012			0.014*	---	0.019	0.016	Yes
4 <sup>th</sup> Q of 2012			0.014*	---	0.019	0.018	Yes
1 <sup>st</sup> Q of 2013			0.015*	---	0.018	0.018	Yes
2 <sup>nd</sup> Q of 2013			0.014	0.014	0.015	0.018	Yes
3 <sup>rd</sup> Q of 2013			0.015*	---	0.014	0.017	Yes
4 <sup>th</sup> Q of 2013			0.015*	---	0.015	0.016	Yes
1 <sup>st</sup> Q of 2014			0.015*	---	0.016	0.015	Yes
2 <sup>nd</sup> Q of 2014	0.012	---	0.014	0.015	0.0095	0.014	Yes
3 <sup>rd</sup> Q of 2014	0.011	---	0.013	0.014	0.0095	0.013	Yes
4 <sup>th</sup> Q of 2014	0.013	---	OOS	0.014	0.0068	0.010	Yes

Q – Quarterly results

RAA – Running Annual Average

Tier 2 PN – Tier 2 Public Notification

OOS – Out-of-service (unable to take a sample)

NS – Not Sample

\* Not in use

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1 COMPLIANCE EFFORTS

2 In April 2013, the Company conducted well profiling for arsenic in Well 8. The results  
3 of the profiling showed that the majority of the arsenic came from the lower portion of  
4 the well's perforations. The Company tried to block the lower portion of the well's  
5 perforations by filling with sand. This did not lower the arsenic concentrations. In April  
6 2014, the Company blocked the lower portion of well's perforations with concrete and  
7 installed a variable speed drive for Well 8 to reduce the pumping rate from 1,000 gpm  
8 to approximately 650 gpm. This has lowered the arsenic concentrations and Well 8  
9 has returned to compliance with arsenic MCL in the fourth quarter of 2014. The  
10 Company now plans to drill two new wells with the hopes of having arsenic  
11 concentrations below the MCL in order to replace Wells 1 and 3. The Company has  
12 estimated that it may take 1.5 years to complete the drilling of two new wells in its  
13 service area. This timeframe is longer than what would typically be required to drill  
14 two wells however, with the current drought that the State of California is experiencing,  
15 securing a qualified, licensed well driller is more difficult and takes more time.

16  
17 **CONCLUSIONS OF LAW**

18 Based on the above Findings, the Division has determined that the Company has  
19 violated provisions contained in the California Health and Safety Code and Title 22,  
20 California Code of Regulations (CCR). These violations include, but are not limited to  
21 the following:

- 22  
23 1. Health and Safety (H&S) Code Section 116555(a)(1) Specifically, The Company is  
24 operating Well 3 that produce water that does not comply with a primary drinking  
25 water standard.

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2. H&S Code Section 116555(a)(3) Specifically, the Company failed to ensure that a reliable and adequate supply of pure, wholesome, healthful, and potable water is provided.
3. CCR Section 64431(a) Specifically, the water produced by the Company's Well 3 exceeds the maximum contaminant level of 0.010 mg/L for arsenic and, therefore, does not comply with a primary drinking water standard.

**ORDER**

In order to ensure that the water supplied by the Company is at all times safe, wholesome, healthful, and potable, and pursuant to Section 116655 of the H&S Code, the water system is ordered to take the following actions:

1. (a) Cease and Desist from failing to comply with H&S Code Section 116555(a)(1) and (3) by ensuring that the Company is provided with a reliable and adequate source of pure, wholesome, healthful, and potable water that is in compliance with all primary drinking water standards.  
(b) By drilling two new wells, the Company has identified, through its own means, a method for returning to compliance with the arsenic MCL. The Company has indicated that the new wells will be in place within 1.5 years. The Company shall, therefore, be in compliance with the arsenic MCL by August 1, 2016.
2. The Company shall continue to provide public notification in accordance with CCR Section 64463 of its inability to meet the arsenic MCL.
3. The public notification shall be provided by the Company at least once every three months until the problem is corrected. Proof of public notification shall be

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provided to the Division following each quarterly notification by the 15<sup>th</sup> day of the month following notification.

4. The Company shall continue to conduct quarterly monitoring of its active wells for arsenic.

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 effective upon issuance.

All submittals required by this Order shall be addressed to:

Paul Williams, P.E.  
District Engineer  
Hollywood District  
Division of Drinking Water  
State Water Resources Control Board  
500 North Central Avenue, Suite 500  
Glendale, CA 91203

If Respondents are unable to perform the tasks specified in this Order for any reason, whether within or beyond Respondents' control, and if Respondents notify the Division in writing no less than seven days in advance of the due date, the Division may extend the time for performance if Respondents demonstrate that they have made their best efforts to comply with the schedules and other requirements of this Order. If Respondents fail to perform any of the tasks specified in this Order by the time described herein or by the time as subsequently extended pursuant to this paragraph, Respondents shall be deemed to have failed to comply with the obligations of this Order and may be subject to additional judicial action, including civil penalties specified in Health and Safety Code, Section 116725.

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The Division of Drinking Water shall not be liable for any injuries or damages to persons or property resulting from acts or omissions by the Respondents, its employees, agents, or contractors in carrying out activities pursuant to this Order, nor shall the Division of Drinking Water be held as a party to any contract entered into by the Respondents or its agents in carrying out activities pursuant to this Order. By issuance of this Order, the Division of Drinking Water does not waive any further enforcement actions.

**PARTIES BOUND**

This Order shall apply to and be binding upon the Land Projects Mutual Water Company, its officers, directors, agents, employees, contractors, successors, and assignees.

**SEVERABILITY**

The requirements of this Order are severable, and the Land Projects Mutual Water Company shall comply with each and every provision thereof notwithstanding the effectiveness of any provisions.

Feb 2, 2015  
Date

Kurt Souza  
Kurt Souza, P.E., Regional Engineer  
Southern California Field Operations Branch  
Division of Drinking Water



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cc: Jacqueline Taylor  
Bureau Director  
Bureau of Environmental Protection  
County of Los Angeles Public Health  
5050 Commerce Drive  
Baldwin Park, CA 91706



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bcc: System No. 1910246, Enforcement File  
Region  
Compliance Order File  
David Chang - SDWIS

