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STATE OF CALIFORNIA
STATE 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 64430 - WATER SYSTEM NO. 1910213
CITATION NO. 04_22_15C_001
Issued on April 16, 2015

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 Avenue, Torrance, CA 90503) for the violation of Section 64430 of Title 22, California Code of Regulations.

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*

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1 *that a violation continues to occur. A separate penalty may be assessed for each*
2 *violation.*

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4 Title 22, California Code of Regulations, Article 3.5 Ground Water Rule, Section
5 64430 provides:

6

7 64430. Requirements

8

9 *A public water system that uses ground water shall comply with the following*
10 *provisions of 40 Code of Federal Regulations as they appear in the Ground Water*
11 *Rule published in 71 Federal Register 65574 (November 8, 2006) and amended in 71*
12 *Federal Register 67427 (November 21, 2006) and 74 Federal Register 30953 (June*
13 *29, 2009), which are hereby incorporated by reference: Sections 141.21(d)(3),*
14 *141.28(a), 141.153(h)(6), Appendix A to Subpart O (Consumer Confidence Reports),*
15 *141.202(a)(8), 141.203(a)(4), Appendices A and B to Subpart Q (Public Notification),*
16 *and 141.400 through 141.405, except that in:*

17 (a) *Sections 141.402(a)(1)(ii), (a)(2), (a)(2)(ii), (a)(4), (a)(4)(ii)(A), (a)(5)(i), and*
18 *(a)(5)(ii), the phrase "§141.21(a)" is replaced by "22 California Code of*
19 *Regulations Sections 64422 and 64423",*

20 (b) *Sections 141.402(a)(1)(ii) and 141.405(b)(4), the phrase "§141.21(c)" is*
21 *replaced by "22 California Code of Regulations Section 64425", and*

22 (c) *Section 141.402(a)(2)(iii), the phrase "§141.21(b)" is replaced by "22 California*
23 *Code of Regulations Section 64424".*

24

25 40 CFR, Section 141.402 provides *in relevant parts (language modified in accordance*
26 *with Title 22, California Code of Regulations, Article 3.5 Ground Water Rule, Section*
27 *64430):*

1 Section 141.402. Ground water source microbial monitoring and analytical methods.

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(a) Triggered source water monitoring —

(1) General requirements. A ground water system must conduct triggered source water monitoring if the conditions identified in paragraphs (a)(1)(i) and (a)(1)(ii) of this section exist.

(i) The system does not provide at least 4-log treatment of viruses (using inactivation, removal, or a State-approved combination of 4-log virus inactivation and removal) before or at the first customer for each ground water source; and

(ii) The system is notified that a sample collected under 22 California Code of Regulations Sections 64422 and 64423 is total coliform-positive and the sample is not invalidated under 22 California Code of Regulations Section 64425.

(2) Sampling requirements. A ground water system must collect, within 24 hours of notification of the total coliform-positive sample, at least one ground water source sample from each ground water source in use at the time the total coliform-positive sample was collected under 22 California Code of Regulations Sections 64422 and 64423, except as provided in paragraph (a)(2)(ii) of this section.

(i) The State may extend the 24-hour time limit on a case-by-case basis if the system cannot collect the ground water source water sample within 24 hours due to circumstances beyond its control. In the case of an extension, the State must specify how much time the system has to collect the sample.

1 (ii) *If approved by the State, systems with more than one ground water*
2 *source may meet the requirements of this paragraph (a)(2) by sampling*
3 *a representative ground water source or sources. If directed by the*
4 *State, systems must submit for State approval a triggered source water*
5 *monitoring plan that identifies one or more ground water sources that are*
6 *representative of each monitoring site in the system's sample siting plan*
7 *under 22 California Code of Regulations Sections 64422 and 64423 and*
8 *that the system intends to use for representative sampling under this*
9 *paragraph...*

10
11 (5) *Exceptions to the triggered source water monitoring requirements. A ground*
12 *water system is not required to comply with the source water monitoring*
13 *requirements of paragraph (a) of this section if either of the following*
14 *conditions exists:*

15 (i) *The State determines, and documents in writing, that the total coliform-*
16 *positive sample collected under 22 California Code of Regulations*
17 *Sections 64422 and 64423 is caused by a distribution system deficiency;*
18 *or*

19 (ii) *The total coliform-positive sample collected under 22 California Code of*
20 *Regulations Sections 64422 and 64423 is collected at a location that*
21 *meets State criteria for distribution system conditions that will cause total*
22 *coliform-positive samples...*

23
24 (h) *Monitoring violations. Failure to meet the requirements of paragraphs (a)–(f) of*
25 *this section is a monitoring violation and requires the ground water system to*
26 *provide public notification under Section 141.204.*
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1 **STATEMENT OF FACTS**

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3 The City is bounded by the city of Carson on the east, the cities of Gardena and
4 Lawndale on the north, the city of Redondo Beach on the west and the cities of Palos
5 Verdes Estates, Rolling Hills Estates, and Lomita on the south. The service area of
6 the City's water system, covering approximately 75 percent of the land within the City
7 limit, is 16.2 square miles. The City's water supply system currently consists of two
8 active wells, five connections with the Metropolitan Water District of Southern
9 California (MWD), three storage reservoirs and five booster stations. The City also
10 maintains connections with two other water systems (California Water Service
11 Company – Dominguez and the City of Lomita) that either buy or sell water from/to the
12 City. The City serves approximately 115,000 people through 25,992 service
13 connections.

14

15 The City is currently operating its water system under a domestic water supply permit
16 (04-07-94P-001) issued by the Division on January 26, 1994 and five permit
17 amendments issued on December 7, 2001, December 19, 2006, August 17, 2008,
18 January 18, 2011, and May 25, 2012.

19

20 The City's Coliform Sample Siting Plan (CSSP) dated February 15, 2011, specifies the
21 collection of twenty-five samples per week from the Main Pressure zone, five samples
22 per month from the Walteria zone, and four samples per month from the intermediate
23 zone. All repeat sample locations for each routine sample site are listed in the
24 approved CSSP. The City contracts the Clinical Laboratory of San Bernardino, Inc.
25 (Clinical Laboratory) for coliform bacteria analyses. The City also measures chlorine
26 residuals at the same time while collecting the routine bacteriological samples from
27 the distribution system.

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1 The City does not provide 4-log virus inactivation treatment for its groundwater wells.
 2 The City submitted to the Division a Ground Water Rule (GWR) Representative
 3 Monitoring Plan (Plan) on October 14, 2009. Because the City did not provide
 4 adequate justification to support the selection of representative source(s) serving each
 5 of the *Total Coliform Rule* (TCR) routine sample sites, the Division sent the City a
 6 letter on December 2, 2009, informing the City that the Division could not approve the
 7 Plan as submitted (Attachment A). In the same letter, the Division advised the City to
 8 provide sufficient documentation to support the selection of representative sources, if
 9 the City still desired to pursue representative monitoring for GWR compliance. A
 10 guidance manual was provided to the City. Otherwise, the City must conduct triggered
 11 source water monitoring upon being notified that a sample collected for the TCR
 12 compliance from the City's system or from any of the City's consecutive systems is
 13 total coliform-positive. The triggered source monitoring must be conducted by the City
 14 within 24 hours of receiving the total coliform-positive notice. The City must collect *E.*
 15 *coli* from all wells in use at the time the total coliform-positive sample was collected.
 16 The Division has not received any revised Plan and supporting documents from the
 17 City since the letter was mailed to the City.

18

19 Monday, March 16, 2015

20 The City's sampler Mr. Landon Mendoza collected the routine total coliform and
 21 chlorine residual samples at 1824 San Ardo Street at 10:12 am. Mr. Mendoza
 22 reported 2.20 mg/L of total chlorine residual. Madrona Well 2 was online. Well 9 was
 23 offline for rehabilitation work.

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1 Tuesday, March 17, 2015

2 The City was notified at 4:30pm by Clinical Laboratory that Sample D26 (1824 San
3 Ardo Street) collected on March 16, 2015 was positive for total coliform, but negative
4 for *E.coli*.

5

6 Wednesday, March 18, 2015

7 The City collected three repeat samples from D26, upstream of D26 (D26A-1831 San
8 Ardo Street), and downstream of D26 (D26B-1823 San Ardo Street) per the approved
9 CSSP. However, the City did not sample Madrona Well 2 in accordance with the
10 GWR triggered source monitoring requirements. Reportedly, Madrona Well 2 was
11 offline due to maintenance issues. The City did not contact the Division to request for
12 permission to extend the 24-hour time limit for collecting the source sample.

13

14 Thursday, March 19, 2015

15 The City placed Madrona Well 2 back to service. Madrona Well 2 produces brackish
16 water that exceeds the secondary standards for chloride, specific conductance,
17 sulfate, total dissolved solids, and manganese. Water produced by the well is treated
18 at the Robert W Goldsworthy Desalter (Desalter) prior to entering the distribution
19 system.

20

21 The City sampled the RO system effluent and the Desalter effluent (after disinfection)
22 for bacteriological analysis. But the City did not collect a raw water sample from
23 Madrona Well 2.

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1 Friday, March 20, 2015

2 All three repeat samples collected on March 18, 2015 came back negative for total
3 coliform and *E.coli*. Chlorine residuals in these samples ranged from 2.12 mg/L to
4 2.20 mg/L.

5

6 Monday, March 23, 2015

7 The samples collected from the RO system effluent and the Desalter effluent on
8 March 19, 2015 came back negative for total coliform and *E.coli*.

9

10 Friday, April 3, 2015

11 The City collected a raw water sample from Madrona Well 2. The City also collected
12 samples from the RO system effluent and the Desalter effluent.

13

14 Monday, April 6, 2015

15 The samples collected on April 3, 2015 from Madrona Well 2, RO system effluent, and
16 Desalter effluent came back negative for total coliform and *E.coli*.

17

18 Tuesday, April 7, 2015

19 Mr. Alan Berndt, Water Operations Superintendent with the City, sent an email to the
20 Division, notifying the Division of the positive result of the routine sample collected
21 from D26 on March 16th and the failure to collect a triggered raw water source sample
22 from Madrona Well 2 within the 24-hour time limit. Mr. Dmitriy Ginzburg, an Associate
23 Sanitary Engineer with the Division, called Mr. Berndt and requested for an incident
24 report. Mr. Berndt provided the Incident Report to the Division via email (Attachment
25 B). According to the report, the City had overlooked the raw water sampling
26 requirements. The City has since noted in the Bacti Log book that any follow-up

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1 samples and all groundwater sources before treatment will be sampled within 24
2 hours of notification from the laboratory of a positive routine bacteriological sample.

3

4 Monday, April 13, 2015

5 The Division received the March 2015 Monthly Summary Report (Summary) from the
6 City via fax (Attachment C). Page 2 of the Summary showed that the triggered source
7 sample had not been collected until April 3, 2015.

8

9 Mr. Ginzburg sent an email to Mr. Berndt requesting copies of laboratory reports for all
10 the above-mentioned samples. Mr. Ginzburg received the requested laboratory
11 reports (Attachment D) via e-mail from Mr. Fred Molina, the Senior Water Quality Staff
12 with the City.

13

14 **DETERMINATIONS**

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16 The Division has determined that the City is in violation of Section 64430 of Title 22,
17 California Code of Regulations due to the failure to conduct the triggered source
18 monitoring within 24 hours of notification of the total coliform-positive sample.
19 Specifically, the City learned of the positive result of the sample collected on March
20 16, 2015 at 1824 San Ardo Street on March 17, 2015 at 4:30pm. Madrona Well 2 was
21 in operation on March 16, 2015. The City did not request for an extension to the 24-
22 hour time limit for conducting source monitoring pursuant to Section 141.402 (a) (2) (i).
23 The City also did not provide documents to demonstrate the positive sample had been
24 caused by a distribution system deficiency and request for an exception to the
25 triggered source water monitoring requirements pursuant to Section 141.402 (a) (5).
26 Yet the City did not collect any source water sample from Madrona Well 2 until 6:30
27 am on April 3, 2015.

1 **DIRECTIVES**

2

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

4

5 1. The City shall institute the permanent internal control mechanism(s) to ensure
6 all compliance samples are collected in a timely manner. By **June 1, 2015**, the
7 City shall develop a plan to improve its water quality monitoring program and
8 submit the plan to the Division.

9

10 2. The City's staff responsible for overseeing the compliance with Title 22
11 monitoring and reporting requirements and staff responsible for collecting the
12 samples shall be fully trained to carry out their duties. By **August 3, 2015**, the
13 City shall submit a letter listing the names of the trainees, contents of the
14 training sections (courses), and dates and locations of these training sections
15 provided. If in-house training is used, information regarding the experiences
16 and qualifications of the instructors shall also be provided. The training courses
17 must be related to GWR monitoring, reporting and notification regulations.

18

19 3. Notify all persons served by the City of the GWR monitoring violation in
20 conformance with Section 64463.7 and Section 64465 of Title 22, California
21 Code of Regulations. Within one year of receiving this citation, the City shall
22 complete the notification. The City shall deliver the notice to each customer
23 receiving a bill by mail or direct delivery. In addition, the City must use one or
24 more of the following methods to reach persons not likely to be reached by a
25 mailing or direct delivery (renters, university students, nursing home patients,
26 prison inmates, etc.): 1) publication in a local newspaper, 2) posting in
27 conspicuous public places served by the water system, or on the internet; or 3)

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1 delivery to community organizations. A template for the Tier 3 public notice is
2 attached (Attachment E). The content of the notice shall be approved by the
3 Division prior to issuance. A copy of the notification shall be submitted to the
4 Division **within ten days of the issuance**, along with the enclosed proof of
5 notification form (Attachment F).
6

7 The Division reserves the right to make modifications to this Citation, as it may deem
8 necessary to protect public health and safety. Such modifications may be issued as
9 amendments to this Citation and shall be effective upon issuance.
10

11 Nothing in this Citation relieves the City of its obligation to meet the requirements of
12 California SDWA, or any regulation, permit, standard or order issued or adopted
13 thereunder.
14

15 All submittals required by this Citation, shall be submitted to the Division at the
16 following address:
17

18 Shu-Fang Orr, P.E.
19 District Engineer, Angeles District
20 State Water Resources Control Board
21 Division of Drinking Water
22 500 N. Central Avenue, Suite 500
23 Glendale, CA 91203
24
25
26
27

1 **PARTIES BOUND**

2

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

5

6 **SEVERABILITY**

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

10

11 **FURTHER ENFORCEMENT ACTION**

12

13 The California SDWA authorizes the Division to: issue citation with assessment of
14 administrative penalties to a public water system for violation or continued violation of
15 the requirements of the California SDWA or any permit, regulation, permit or order
16 issued or adopted thereunder including, but not limited to, failure to correct a violation
17 identified in a citation or compliance order. The California SDWA also authorizes the
18 Division to take action to suspend or revoke a permit that has been issued to a public
19 water system if the system has violated applicable law or regulations or has failed to
20 comply with an order of the Division; and to petition the superior court to take various
21 enforcement measures against a public water system that has failed to comply with an
22 order of the Division. The Division does not waive any further enforcement action by
23 issuance of this citation.

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April 16, 2015

Date

Shu-Fang Orr

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



Attachments (6):

- A. The Division's Letter to the City dated December 2, 2009
- B. The City of Torrance Incident Report Email
- C. City of Torrance March 2015 Monthly Summary
- D. Laboratory Hard Copies of Coliform Sampling Results
- E. Tier 3 Public Notice Template
- F. Proof of Public Notification for Groundwater Rule Triggered Source Monitoring Failure

BY CERTIFIED MAIL NO. 7014 2870 0001 2130 1533

The Division's Letter to the City dated December 2, 2009



MARK B HORTON, MD, MSPH
Director

State of California—Health and Human Services Agency
California Department of Public Health



ARNOLD SCHWARZENEGGER
Governor

December 2, 2009

Alan Berndt
Senior Water Service Supervisor
City of Torrance
20500 Madrona Ave.
Torrance, CA 90503

Dear Mr. Berndt:

**SYSTEM NO. 1910213 – GROUNDWATER RULE (GWR) AMENDMENT TO
COLIFORM SAMPLE SITING PLAN**

The City of Torrance (City) submitted to the Department a GWR Representative Monitoring Plan (Plan) on October 14, 2009. No justification was provided in the Plan to support the selection of sources representing (serving) the *Total Coliform Rule* (TCR) routine sample sites. Upon numerous requests from the Department, the City finally emailed the Department the system peak hour pressure maps and water age contour maps on November 24, 2009. The City also emailed the Department a modified sampling plan on the same day. On November 30, 2009, the City forwarded a letter dated October 16, 2006 from Tetra Tech, Inc. to the City regarding the hydraulic modeling project. Unfortunately, the City did not provide information to demonstrate the model is well calibrated and adequately representing the current hydraulic configuration of the City's water system. In addition, the system peak hour pressure and water age contour maps submitted by the City only show a portion of the City's water system. Therefore, the Department can not approve the Plan as submitted.

To comply with the federal GWR, beginning December 1, 2009, the City must conduct triggered source water monitoring upon being notified that a sample collected for the TCR compliance from the City's system or from any of the City's consecutive systems is total coliform-positive. The triggered source monitoring must be conducted by the City within 24 hours of receiving the total coliform-positive notice. Unless the City has an approved 4-log treatment of viruses for all the groundwater sources or an approved representative monitoring plan, the City must collect a sample from all wells in use at the time the total coliform-positive sample was collected. Please collect a standard sample volume of at least 100 mL for source water *E. coli* analysis. In addition, please require your contracted laboratory to analyze the source water samples using one of the analytical methods listed in Section 141.402 (c) (2), 40 CFR for the presence of *E. coli*.

Mr. Alan Berndt
Page 2
December 2, 2009

Please note that if any triggered source sample tested positive for *E. Coli*, the City must notify the Department and conduct Tier 1 Public Notification within 24 hours of being notified of the positive result.

If the City still desires to pursue representative monitoring for GWR compliance, the City needs to provide sufficient documentation to support the selection of representative sources. To assist the City in preparing an acceptable Plan, we have enclosed a copy of *Chapter 5, Ground Water Sources Representing Coliform Monitoring Locations in the Distribution System* from the USEPA guidance manual entitled "*Ground Water Rule Triggered and Representative Monitoring Guidance Manual, EPA 815-R-09-003*" for your reference.

If you have any questions, please contact Lei Li at (213) 580-5771 or me at (213) 580-5702. For more information regarding federal GWR, please visit the USEPA website at: www.epa.gov/ogwdw/disinfection/qwr/regulation.html.

Sincerely,



Shu-Fang Orr, P.E.
District Engineer
Angeles District

Enclosure

The City of Torrance Incident Report Email dated April 7, 2015

From: "Berndt, Alan" <ABERNDT@TorranceCA.gov>

Date: April 7, 2015 at 3:43:18 PM PDT

To: "Orr, Shu-Fang (CDPH-DDWEM)" <Shu-Fang.Orr@cdph.ca.gov>

Subject: RE: Incident report for Groundwater samples after a positive routine coliform sample

Shu-Fang Orr

Incident Report For Review

March 17th 2015 we were notified by Clinical labs, that sample D26 (1824 San Ardo St.) was positive for total coliform, but negative for E-Coli. On March 18th 2015, sample points D26, D26A (1831 San Ardo St.), D26B (1823 San Ardo St.) were sampled as required for Total coliform Rule. Also on March 18th Well 9 was still offline for Rehab. Well 9 was sampled on March 19th prior to putting well back into service. Well 2 was not sampled because it was offline due to maintenance issues. Well 2 before blend (R.O. effluent) and Well 2 after blend (Plant Effluent) were sampled on March 19th 2015, when well was put back into service. All follow-up samples and Ground water samples came back negative for Total Coliform.

Well 2 was not sampled before treatment for coliform. The reason was that the weekly samples for Goldsworthy did not include sampling the raw water, and because of habit for the weekly samples, the raw water sample was overlooked. This was an error in sampling location in accordance of the Groundwater rule. All groundwater sources must be sampled before treatment after 24 hours of notification of a positive routine bacti sample. Well 2 has since been sampled before treatment on April 4th 2015, with Total coliform absent.

1824 San Ardo st. is 3.5 miles away from Well 2. It is located in the main pressure zone on the eastern boundaries of that zone and is served with Met water.

We have since noted in the Bacti Log book that any Follow-up samples and all Groundwater sources before treatment will be sampled within 24 hours of notification from the lab of a positive routine bacti sample.

Fred Molina

City of Torrance March 2015 Monthly Summary

MONTHLY SUMMARY OF DISTRIBUTION SYSTEM COLIFORM MONITORING
(including triggered source monitoring for systems subject to the Groundwater Rule)

System Name <p align="center">Torrance Water Dept.</p>	System Number <p align="center">19-10-213</p>
Sampling Period <p align="center">Month March</p>	Year <p align="center">2015</p>

	Number Required	Number Collected	Number Total Coliform Positives	Number Fecal/ E.coli Positives
1. Routine Samples (see note 1)	<u>136</u>	<u>136</u>	<u>1</u>	<u>0</u>
2. Repeat Samples following Samples that are Total Coliform Positive and Fecal/E.coli <i>Negative</i> (see notes 5 and 6)		<u>3</u>	<u>0</u>	<u>0</u>
3. Repeat Samples following Routine Samples that are Total Coliform <i>Positive</i> and Fecal/E.coli Positive (see notes 5 and 6)		<u>0</u>	<u>0</u>	<u>0</u>
4. MCL Computation for Total Coliform Positive Samples				
a. Totals (sum of columns)		<u>139</u>	<u>1</u>	
b. If 40 or more samples collected in month, determine percent of samples that are total coliform positive [(total number positive/total number collected) x 100] =	<u>0.0074</u>	%		
c. Is system in compliance.....with fecal/E. coli MCL? (see notes 2 and 3)	<input checked="" type="checkbox"/> Yes		<input type="checkbox"/> No	
.....with monthly MCL? (see note 4)	<input checked="" type="checkbox"/> Yes		<input type="checkbox"/> No	
5. Source Samples Triggered by Routine Samples that are Total Coliform Positive (This applies only to systems subject to the Groundwater Rule - see notes 7 and 8)		<u>0</u>	<u>0</u>	<u>0</u>
6. Invalidated Samples (Note what samples, if any, were invalidated; who authorized the invalidation; and when replacement samples were collected. Attach additional sheets, if necessary.)				
7. Summary Completed By:				

APR 13 2015

Signature 	Title <p align="center">Sr. Water Quality Inspector</p>	Date
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NOTES AND INSTRUCTIONS:

1. Routine samples include:
 - a. Samples required pursuant to 22 CCR Section 64423 and any additional samples required by an approved routine sample siting plan established pursuant to 22 CCR Section 64422.
 - b. Extra samples are required for systems collecting less than five routine samples per month that had one or more total coliform positives in previous month;
 - c. Extra samples for systems with high source water turbidities that are using surface water or groundwater under direct influence of surface water and do not practice filtration in compliance with regulations;
2. Note: For a repeat sample following a total coliform positive sample, any fecal/*E.coli* positive repeat (boxed entry) constitutes an MCL violation and requires immediate notification to the Department (22, CCR, Section 64426.1).
3. Note: For repeat sample following a fecal/*E.coli* positive sample, any total coliform positive repeat (boxed entry) constitutes an MCL violation and requires immediate notification to the Department (22, CCR, Section 64426.1).
4. Total coliform MCL (Notify Department within 24 hours of MCL violation):
 - a. For systems collecting less than 40 samples, if two or more samples are total coliform positive, then the MCL is violated.
 - b. For systems collecting 40 or more samples, if more than 5.0 percent of samples collected are total coliform positive, then the MCL is violated.
5. Positive results and their associated repeat samples are to be tracked on the Coliform Monitoring Worksheet.
6. Repeat samples must be collected within 24 hours of being notified of the positive results. For systems collecting more than one routine sample per month, three repeat samples must be collected for each total coliform positive sample. For systems collecting one or fewer routine samples per month, four repeat samples must be collected for each total coliform positive sample.
7. For systems subject to the Groundwater Rule: Positive results and the associated triggered source samples are to be tracked on the Coliform Monitoring Worksheet.
8. For triggered sample(s) required as a result of a total coliform routine positive sample, an *E.coli*, enterococci, or coliphage positive triggered sample (boxed entry) requires immediate notification to the Department, Tier 1 public notification, and corrective action.

COLIFORM MONITORING WORKSHEET

(COMPLETED FOR POSITIVE ROUTINE SAMPLES, ALL REPEAT SAMPLES, AND ALL TRIGGERED SOURCE SAMPLES)

Routine Samples ⁹			Repeat Samples ⁶				Triggered Source Samples ⁸				
TC+ Sample Date	TC+ Sample Site ID	¹² EC/FC Results	Repeat Collection Date	Repeat Sample Site IDs ¹⁰	Coliform Results (Check one box)			Source Sample Date	Groundwater Source(s) Sampled	¹² TC Results	^{11,12} E. coli Results
					TC-	TC+BUT FC/EC-	TC+AND FC/EC+				
3/16/2015	D26	(+ / -)	3/18/2015	1 D26	X			4/3/2015	Well 2	Neg.	Neg.
			3/18/2015	2 D26A	X					(+ / -)	(+ / -)
			3/18/2015	3 D26B	X					(+ / -)	(+ / -)
				4						(+ / -)	(+ / -)
		(+ / -)		1					(+ / -)	(+ / -)	
		(+ / -)		2					(+ / -)	(+ / -)	
		(+ / -)		3					(+ / -)	(+ / -)	
		(+ / -)		4					(+ / -)	(+ / -)	
		(+ / -)		1					(+ / -)	(+ / -)	
		(+ / -)		2					(+ / -)	(+ / -)	
		(+ / -)		3					(+ / -)	(+ / -)	
		(+ / -)		4					(+ / -)	(+ / -)	
		(+ / -)		1					(+ / -)	(+ / -)	
		(+ / -)		2					(+ / -)	(+ / -)	
		(+ / -)		3					(+ / -)	(+ / -)	
		(+ / -)		4					(+ / -)	(+ / -)	
		(+ / -)		1					(+ / -)	(+ / -)	
		(+ / -)		2					(+ / -)	(+ / -)	
		(+ / -)		3					(+ / -)	(+ / -)	
		(+ / -)		4					(+ / -)	(+ / -)	
		(+ / -)		1					(+ / -)	(+ / -)	
		(+ / -)		2					(+ / -)	(+ / -)	
		(+ / -)		3					(+ / -)	(+ / -)	
		(+ / -)		4					(+ / -)	(+ / -)	
		(+ / -)		1					(+ / -)	(+ / -)	
		(+ / -)		2					(+ / -)	(+ / -)	
		(+ / -)		3					(+ / -)	(+ / -)	
		(+ / -)		4					(+ / -)	(+ / -)	

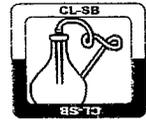
Comments: Well 2 was not sampled within 24hours of notification by the lab. It was sampled on 4-3-15.sample results were negative . Well 9 was offline for well rehabilitation.

NOTES AND INSTRUCTIONS:

6. Repeat samples must be collected within 24 hours of being notified of the positive results. For systems collecting more than one routine sample per month, three repeat samples must be collected for each total coliform positive sample. For systems collecting one or fewer routine samples per month, four repeat samples must be collected for each total coliform positive sample.
8. For triggered sample(s) required as a result of a total coliform routine positive sample, an *E.coli*, enterococci, or coliphage positive triggered sample (boxed entry) requires immediate notification to the Department, Tier 1 public notification, and corrective action.
9. Also include any data for positive samples that occurred in the previous month that led to repeat monitoring occurring in the reporting month. Include location and indicate if the routine sample was either positive or negative for *E.coli* or Fecal Coliforms.
10. For systems serving ≤ 1000 persons that collect one or fewer routine samples per month, a triggered source water sample may be used as the fourth repeat, as noted in an approved plan, if *E. coli* was the indicator used. Show result in GW source column too.
11. The Department recommends using *E. coli* (see note 8). If enterococci or coliphage is used, note which in the comment box below.
12. Circle the appropriate result.

Laboratory Hard Copies of Coliform Sampling Results

Clinical Laboratory of San Bernardino, Inc.



Client: Torrance, City of
3031 Torrance Blvd.
Torrance CA, 90503

Contact: Fred Molina
Phone: (310) 781-6961
Fax: (310) 618-6256
System: 1910213

Project: Torrance Drinking Water
Sub Project: Bacteriological Route D

Sampler: Landon Mendoza
Sampled: 03/16/15

Received: 03/16/15 17:05
Reported: 03/19/15

Laboratory ID	Sample Time	Sample Location	Cl Res Total (Field) mg/L	Temperature (Field) °C	Total Coliform P/A	E. Coli P/A	Plate Count CFU/ml
15C1266-01	11:04	D1	1.77		A	A	
15C1266-02	11:11	D2	1.80		A	A	
15C1266-03	11:19	D3	2.12		A	A	
15C1266-04	11:28	D4	1.71		A	A	
15C1266-05	11:37	D5	1.67		A	A	
15C1266-06	11:45	D6	1.74		A	A	
15C1266-07	11:50	D7	1.56		A	A	
15C1266-08	12:02	D8	1.34	23.0	A	A	
15C1266-09	12:08	D9	1.71		A	A	
15C1266-10	13:17	D10	1.75		A	A	
15C1266-11	13:09	D11	1.81	21.0	A	A	
15C1266-12	13:23	D12	1.92		A	A	
15C1266-13	13:30	D13	2.06	21.0	A	A	
15C1266-14	8:00	D14	1.69		A	A	
15C1266-15	8:07	D15	1.29		A	A	
15C1266-16	8:16	D16	1.53		A	A	
15C1266-17	8:30	D17	1.43		A	A	
15C1266-18	8:49	D18	0.91		A	A	
15C1266-19	8:56	D19	1.01	19.0	A	A	
15C1266-20	9:06	D20	0.17	21.0	A	A	<1 [1]
15C1266-21	9:33	D21	1.28		A	A	
15C1266-22	9:41	D22	1.58		A	A	
15C1266-23	9:50	D23	1.76		A	A	
15C1266-24	9:59	D24	2.11	21.0	A	A	
15C1266-25	10:05	D25	2.19		A	A	
15C1266-26	10:12	D26	2.20		P [2]	A	
15C1266-27	10:19	D27	2.20	21.0	A	A	

- 1 = Analysis performed outside of recommended 8 hour hold time but within required 24 hour hold time.
2 = Notified Fred Molina 3/17/15, 1630

Robin Glenney
Project Manager

Clinical Laboratory of San Bernardino, Inc.

Client		City of Torrance		System Number		Analysis Requested		
Address		20500 Madrona Avenue Torrance, CA 90503		1910213				
Contact		Fred Molina		Email Address: <u>Fmolina@TorranceCA.Gov</u>				
Phone #		(310) 781-6961		Fax #: (310) 618-6256				
Project		Drinking Water		Reporting Requests:				
Sub Project		Bacteriological Route D		<input type="checkbox"/> State EDT <input type="checkbox"/> Test Share <input type="checkbox"/> CC's To: <input type="checkbox"/> RUSH REQUEST days *upon laboratory approval				
Sampled by		Landon Mendoza						
Date	Time	Sample Identification	Misc	Type	Preservative	Days in Storage	Temp C	Comments
3/16/15	11:04A	D1		DW	1	1	1.77	X
	11:11	D2		DW	1	2	1.80	X
	11:19	D3		DW	1	3	2.12	X
	11:28	D4		DW	1	4	1.71	X
	11:37	D5		DW	1	5	1.67	X
	11:45	D6		DW	1	6	1.74	X
	11:50	D7		DW	1	7	1.56	X
	12:02	D8		DW	1	8	1.34	23 X
	12:08	D9		DW	1	9	1.71	X
	1:17	D10		DW	1	10	1.75	X
	1:09P	D11		DW	1	11	1.81	21 X
	1:23	D12		DW	1	12	1.92	X
	1:30P	D13		DW	1	13	2.06	21 X
	8:00A	D14		DW	1	14	1.69	X
	8:07	D15		DW	1	15	1.29	X
	8:16	D16		DW	1	16	1.53	X
	8:30	D17		DW	1	17	1.43	X
	8:49	D18		DW	1	18	0.91	X
	8:56A	D19		DW	1	19	1.01	19 X
	9:06	D20		DW	1	20	0.17	21 X
	9:33	D21		DW	1	21	1.28	X
	9:41A	D22		DW	1	22	1.58	X
	9:50	D23		DW	1	23	1.76	X
	9:59	D24		DW	1	24	2.4	21 X
	10:05	D25		DW	1	25	2.19	X
	10:12A	D26		DW	1	26	2.20	X
	10:19	D27		DW	1	27	2.20	21 X

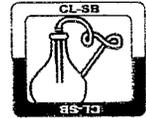
Manta: DW-Drinking Water, WW-Waste Water, SW-Storm Water, GW-Ground Water
 Type: 1-Routine, 2-Repeat, 3-Replacement, 4-Special
 (2) HCl (3) HNO3 (4) NH4Cl (5) H2SO4 (6) Na2SO3 (7) Cold (8) Other:

Relinquished By (Signature) Landon Mendoza Date/Time 3/16/15 / 1:51 PM 230
 Print Name/Company Landon Mendoza / Torrance Date/Time 3/16/15 / 5:05
 Relinquished By (Signature) D. Chaparro / CLSB Date/Time 3/16/15 / 5:05 230
 Print Name/Company D. Chaparro / CLSB

Preservatives: (1) Na2S2O3
 Samples received: () On Ice () Intact () Custody seals Temp 5.5 () F () C

ELAP # 1088 Page 1 of 1

Clinical Laboratory of San Bernardino, Inc.



Client: Torrance, City of
3031 Torrance Blvd.
Torrance CA, 90503

Contact: Fred Molina
Phone: (310) 781-6961
Fax: (310) 618-6256
System: 1910213

Project: Torrance Drinking Water

Sub Project:

Sampler: Mendoza/Adams/Molina

Sampled: 03/18/15

Received: 03/18/15 16:30

Reported: 03/20/15

RESULTS

Laboratory ID	Sample Time	Sample Location	Cl Res Total (Field) mg/L	Total Coliform P/A	E. Coli P/A
15C1555-01	9:50	D26	2.20	A	A
15C1555-02	9:55	D26A	2.15	A	A
15C1555-03	10:05	D26B	2.12	A	A
15C1555-04	9:15	Walt	0.90	A	A

Stu Styles For Robin Glenney

Project Manager

Client		City of Torrance		System Number		Analysis Requested			
Address		20500 Madrona Avenue Torrance, CA 90503		1910213		HPC (SM 9215B)			
Contact		Fred Molina		Email Address: Fmolina@TorranceCA.Gov		P/A (SM 9223)			
Phone #		(310) 781-6961		Fax #: (310) 618-6256					
Project		Drinking Water		Reporting Requests:					
Sub Project		Bacteriological		<input type="checkbox"/> State EDT <input type="checkbox"/> Test Share <input type="checkbox"/> CC's To: <input type="checkbox"/> RUSH REQUEST days * upon laboratory approval					
Sampled by		MENDOZA / Adams / Molina							
Date	Time	Sample Identification	Matrix	Type	Preservatives	Bottle Number	Total Volume	Temp C	Comments
3-18-15		well 9 RAW	DW		1,7	W9A			X
3-18-15		well 9 EFFluent	DW		1,7	W9B			X
3-18-15	3-18	D26 455-950	DW		1,7	1	2.20		X
3-18-15	3-18	D26A 1065 955	DW		1,7	2	2.15		X
3-18-15	3-18	D26 B 4810 per Fred M.	DW		1,7	3	2.12		X
3-18-15	9:15am	W91 1005 1.416 Bx	DW		1,7	4	.90		X
			DW		1,7				
			DW		1,7				
			DW		1,7				
			DW		1,7				
			DW		1,7				
			DW		1,7				
			DW		1,7				
			DW		1,7				
			DW		1,7				
			DW		1,7				

Matrix: DW-Drinking Water, WW-Waste Water, SW-Storm Water, GW-Ground Water Type- 1-Routine, 2-Repeat, 3-Replacement, 4-Special
 HCl (3) HNO3 (4) NH4Cl (5) H2SO4 (6) Na2SO3 (7) Cold (8) Other:

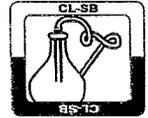
Requisitioned By (Sign) _____ Date/Time _____ Received By (Sign) _____ Date/Time _____
 Print Name / Company _____ Print Name / Company _____

John Adams / City of Torrance
 J. Molina / CLS
 Samples received: () On ice () Intact () Custody seals Temp 76.9 () F X C

ELAP # 1088 Preservatives: (1) Na2S2O3 (2) J. Molina / CLS
 T. Adams / CLS

Page 1 of 1

Clinical Laboratory of San Bernardino, Inc.



Client: Torrance, City of
3031 Torrance Blvd.
Torrance CA, 90503

Contact: Fred Molina
Phone: (310) 781-6961
Fax: (310) 618-6256
System: 1910213

Project: Torrance WRD

Sub Project: Bacteriological

Sampler: Fred Molina

Sampled: 03/19/15

Received: 03/19/15 17:30

Reported: 03/23/15

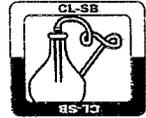
RESULTS

Laboratory ID	Sample Time	Sample Location	Total Coliform P/A	E. Coli P/A	Plate Count CFU/ml
15C1631-01		Well 2 RO Effluent Prior to Blending	A	A	6
15C1631-02		Well 2 RO Effluent After Blending	A	A	3

Robin Glenney

Project Manager

Clinical Laboratory of San Bernardino, Inc.



Client: Torrance, City of
3031 Torrance Blvd.
Torrance CA, 90503

Contact: Fred Molina
Phone: (310) 781-6961
Fax: (310) 618-6256
System: 1910213

Project: Torrance WRD

Sub Project: Bacteriological

Sampler: Fred Molina

Sampled: 04/03/15

Received: 04/03/15 15:25

Reported: 04/06/15

RESULTS

Laboratory ID	Sample Time	Sample Location	Total Coliform P/A	E. Coli P/A	Plate Count CFU/ml
15D0331-01	6:30	Well 2 Raw	A	A	29 [1]
15D0331-02	6:35	Well 2 RO Effluent Prior to Blending	A	A	2 [1]
15D0331-03	6:40	Well 2 RO Effluent After Blending	A	A	<1 [1]

1 = Analysis performed outside of recommended 8 hour hold time but within required 24 hour hold time.

Robin Glenney

Project Manager

Tier 3 Public Notice Template

Instructions for Tier 3 Monitoring Violations Annual Notice Template

Template Attached

Since most monitoring violations are included in Tier 3, you must provide public notice to persons served within one year after you learn of the violation [California Code of Regulations, Title 22, Chapter 15, Section 64463.7(b)]. Multiple monitoring violations can be serious. **Each water system required to give public notice must submit the notice to the State Water Resources Control Board, Division of Drinking Water (DDW) for approval prior to distribution or posting, unless otherwise directed by the DDW [64463(b)].**

Notification Methods

You must use the methods summarized in the table below to deliver the notice to consumers. If you mail, post, or hand deliver, print your notice on letterhead, if available.

<i>If You Are a...</i>	<i>You Must Notify Consumers by...</i>	<i>...and By One or More of the Following Methods to Reach Persons Not Likely to be Reached by the Previous Method...</i>
Community Water System [64463.7(c)(1)]	Mail or direct delivery ^(a)	Publication in a local newspaper
		Posting ^(b) in conspicuous public places served by the water system or on the Internet
		Delivery to community organizations
Non-Community Water System [64463.7(c)(2)]	Posting in conspicuous locations throughout the area served by the water system ^(b)	Publication in a local newspaper or newsletter distributed to customers
		Email message to employees or students
		Posting ^(b) on the Internet or intranet
		Direct delivery to each customer

(a) Notice must be distributed to each customer receiving a bill including those that provide their drinking water to others (e.g., schools or school systems, apartment building owners, or large private employers), and other service connections to which water is delivered by the water system.

(b) Notice must be posted in place for as long as the violation or occurrence continues, but in no case less than seven days.

The notice attached is appropriate for the methods described above, insertion in an annual notice, or included in the Consumer Confidence Report¹. However, you may wish to modify it before using it for posting. If you do, you must still include all the required elements and leave the standard language for monitoring and testing

¹ CCR may be used as long as public notification timing, content, and delivery requirements are met [64463.7(d)].

procedure violations and notification language in italics unchanged. This language is mandatory [64465].

You may need to modify the template for a notice for individual monitoring violations. The template presents violations in a table; however, you may write out an explanation for each violation if you wish. For any monitoring violation for volatile organic compounds (VOCs) or other groups, you may list the group name in the table, but you must provide the name of every chemical in the group on the notice (e.g., in a footnote). An example is shown in the table below.

<i>Contaminant</i>	<i>Required Sampling Frequency</i>	<i>Number of Samples Taken</i>	<i>When All Samples Should Have Been Taken</i>	<i>When Samples Were or Will Be Taken</i>
VOCs ^(a)	1 sample every 3 years	None	2002 – 2005	February 2006

(a) Benzene; Carbon Tetrachloride; 1,2-Dichlorobenzene; 1,4-Dichlorobenzene; 1,1-Dichloroethane; 1,2-Dichloroethane; 1,1-Dichloroethylene; cis-1,2-Dichloroethylene; trans-1,2-Dichloroethylene; Dichloromethane; 1,2-Dichloropropane; 1,3-Dichloropropene; Ethylbenzene; Methyl-*tert*-butyl ether; Monochlorobenzene; Styrene; 1,1,2,2-Tetrachloroethane; Tetrachloroethylene; Toluene; 1,2,4-Trichlorobenzene; 1,1,1-Trichloroethane; 1,1,2-Trichloroethane; Trichloroethylene; Trichlorofluoromethane; 1,1,2-Trichloro-1,2,2-Trifluoroethane; Vinyl Chloride; and Xylenes.

You may need to modify the notice if you had any monitoring violations for which monitoring later showed a maximum contaminant level or other violation. In such cases, you should refer to the public notice you issued at that time.

Multilingual Requirement

The notice must (1) be provided in English, Spanish, and the language spoken by any non-English-speaking group exceeding 10 percent of the persons served by the water system and (2) include a telephone number or address where such individuals may contact the water system for assistance.

If any non-English-speaking group exceeds 1,000 persons served by the water system, but does not exceed 10 percent served, the notice must (1) include information in the appropriate language(s) regarding the importance of the notice and (2) contain the telephone number or address where such individuals may contact the water system to obtain a translated copy of the notice from the water system or assistance in the appropriate language.

Population Served

Make sure it is clear who is served by your water system -- you may need to list the areas you serve.

Corrective Actions

In your notice, describe corrective actions you took or are taking. Listed below are some steps commonly taken by water systems with monitoring violations. Choose the appropriate language, or develop your own:

- “We have since taken the required samples, as described in the last column of the table above. The samples showed we are meeting drinking water standards.”
- “We have since taken the required samples, as described in the last column of the table above. The sample for [contaminant] exceeded the limit. [Describe corrective action; use information from public notice prepared for violating the limit.]”
- “We plan to take the required samples soon, as described in the last column of the table above.”

After Issuing the Notice

Send a copy of each type of notice and a certification that you have met all the public notice requirements to the DDW within ten days after you issue the notice [64469(d)]. You should also issue a follow-up notice in addition to meeting any repeat notice requirements the DDW sets.

It is recommended that you notify health professionals in the area of the violation. People may call their doctors with questions about how the violation may affect their health, and the doctors should have the information they need to respond appropriately.

It is a good idea to issue a “problem corrected” notice when the violation is resolved.

IMPORTANT INFORMATION ABOUT YOUR DRINKING WATER

Este informe contiene información muy importante sobre su agua potable.
Tradúzcalo o hable con alguien que lo entienda bien.

**Monitoring Requirements Not Met for
[System]**

Our water system failed to monitor as required for drinking water standards during the past year and, therefore, was in violation of the regulations. Even though this failure was not an emergency, as our customers, you have a right to know what you should do, what happened, and what we did to correct this situation.

We are required to monitor your drinking water for specific contaminants on a regular basis. Results of regular monitoring are an indicator of whether or not our drinking water meets health standards. During [compliance period dates], we [‘did not monitor or test’ or ‘did not complete all monitoring or testing’] for [contaminant(s)] and therefore, cannot be sure of the quality of our drinking water during that time.

What should I do?

- There is nothing you need to do at this time.
- The table below lists the contaminant(s) we did not properly test for during the last year, how many samples we are required to take and how often, how many samples we took, when samples should have been taken, and the date on which follow-up samples were (or will be) taken.

<i>Contaminant</i>	<i>Required Sampling Frequency</i>	<i>Number of Samples Taken</i>	<i>When All Samples Should Have Been Taken</i>	<i>When Samples Were or Will Be Taken</i>
	[number] sample every [number][time interval]			

- If you have health issues concerning the consumption of this water, you may wish to consult your doctor.

What happened? What is being done?

[Describe corrective action].

For more information, please contact [name of contact] at [phone number] or [mailing address].

Please share this information with all the other people who drink this water, especially those who may not have received this 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.

Secondary Notification Requirements

Upon receipt of notification from a person operating a public water system, the following notification must be given within 10 days [Health and Safety Code Section 116450(g)]:

- **SCHOOLS:** Must notify school employees, students, and parents (if the students are minors).
- **RESIDENTIAL RENTAL PROPERTY OWNERS OR MANAGERS** (including nursing homes and care facilities): Must notify tenants.
- **BUSINESS PROPERTY OWNERS, MANAGERS, OR OPERATORS:** Must notify employees of businesses located on the property.

This notice is being sent to you by [system].

State Water System ID#: _____. Date distributed: _____.

**Proof of Public Notification for Groundwater Rule Triggered Source
Monitoring Failure**

PROOF OF NOTIFICATION

Name of Water System: City of Torrance

System Number: 1910213

**Certification of Notification for
GWR Triggered Source Monitoring Violation**

As required by *California Code of Regulations*, Title 22, Section 64463.7, I notified the users of the water supplied by the City of Torrance of the violation of Section 64430, 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