STATE OF CALIFORNIA

STATE WATER RESOURCES CONTROL BOARD

DIVISION OF DRINKING WATER

IN RE: Sativa Los Angeles County Water District
2015 E. Hatchway Street
Compton, CA 90222-3519

TO: Mr. Thomas Martin, General Manager
Sativa Los Angeles County Water District

CITATION FOR NONCOMPLIANCE - WATER SYSTEM NO. 1910147

CITATION NO. 04_22_15C_005

Issued on November 16, 2015

Section 116650 of the California Health and Safety Code (hereinafter "H&S Code"), authorizes the State Water Resources Control Board (hereinafter "State Board") to issue a citation to a public water system when the State Board determines that the public water system has violated or is violating the California Safe Drinking Water Act (H&S Code, Division 104, Part 12, Chapter 4, commencing with Section 116270), or any regulation, standard, permit, or order issued or adopted thereunder.

The State Board, acting by and through its Division of Drinking Water (hereinafter "Division") and the Deputy Director for the Division, hereby issues this citation to the Sativa Los Angeles County Water District (hereinafter "District") (mailing address: 2015 E. Hatchway Street, Compton, CA 90222) for violating Sections 64534 (g),

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64534.2 (d), 64534.8, 64537(a) and 64537.2 of Title 22, California Code of Regulations (hereinafter "CCR").

APPLICABLE AUTHORITIES

Section 116650 of H&S Code provides:

116650. Citations

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

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

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

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

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

Title 22, CCR, Section 64534 states in relevant part:

Section 64534. General Monitoring Requirements.

g) Systems that fail to monitor in accordance with the monitoring plan required by Section 64534.8 shall be in violation of the monitoring requirements, and shall notify the public pursuant to Sections 64463, 64463.7, and 64465, in addition to reporting to the State Board pursuant to Sections 64537 through 64537.6.

Title 22, CCR, Section 64534.2 states in relevant part:

Section 64534.2 Disinfection Byproducts Monitoring.

(d) By the applicable date specified in Section 64530 (d), and in lieu of TTHM and HAA5 monitoring in subsection (a):

(1) Community and nontransient noncommunity water systems shall monitor for TTHM and HAA5 at the frequencies and location totals indicated in Table 64534.2-C and in accordance with the monitoring plan developed pursuant to Section 64534.8;...

Table 64534.2-C Routine Monitoring Frequency for TTHM and HAA5

Source water type	Persons served	Minimum monitoring frequency [1]	
		Number of distribution system monitoring locations	Monitoring period[2]
System using approved surface water	≥5,000,000	20 dual sample sets	Per quarter
	1,000,000-4,999,999	16 dual sample sets	Per quarter
	250,000-999,999	12 dual sample sets	Per quarter
	50,000-249,999	8 dual sample sets	Per quarter
	10,000-49,999	4 dual sample sets	Per quarter
	3,301-9,999	2 dual sample sets	Per quarter
	500-3,300	1 TTHM and 1 HAA5 sample: one at the location with the highest TTHM measurement, one at the location with the highest HAA5 measurement	Per quarter
	<500	1 TTHM and 1 HAA5 sample: one at the location with the highest TTHM measurement, one at the location with the highest HAA5 measurement[3]	Per year
Systems using ground water not under direct influence of surface water	≥500,000	8 dual sample sets	Per quarter
	100,000-499,999	6 dual sample sets	Per quarter
	10,000-99,999	4 dual sample sets	Per quarter
	500-9,999	2 dual sample sets	Per year
	<500	1 TTHM and 1 HAA5 sample: one at the location with the highest TTHM measurement, one at the location with the highest HAA5 measurement[3]	Per year

1. *All system shall monitor during the month of highest disinfection byproduct concentrations.*
2. *Systems on quarterly monitoring shall take dual sample sets every 90 days at each monitoring location, except for systems using approved surface water and serving 500-3,300 persons.*
3. *Only one location with a dual sample set per monitoring period is needed if the highest TTHM and HAA5 concentrations occur at the same location and month.*

Title 22, CCR, Section 64534.8 states in relevant parts:

Section 64534.8. Monitoring Plans.

(a) A system shall develop and submit to the State Board a monitoring plan. The system shall implement the plan after State Board review and approval. The system shall maintain the plan and make it available for inspection by the general public no later than 30 days following the applicable compliance date in Sections 64530(a) or (b), and (d)…

(e) The plan developed for compliance monitoring pursuant to Section 64534.2(d) may be revised to reflect changes in treatment, distribution system operations and layout (including new service areas), or other factors that may affect TTHM or HAA5 formation, or for State Board-approved reasons, after consultation with the State Board regarding the need for changes and the appropriateness of changes. Systems shall comply with the requirements of subsection (a) for the revised plan. If monitoring locations are changed, systems shall replace existing compliance monitoring locations having the lowest LRAA with new locations that reflect the current distribution system locations having expected high TTHM or HAA5 levels.

Title 22, CCR, Section 64537 states in relevant parts:

Section 64537. General Reporting and Recordkeeping Requirements.

(a) Systems required to sample quarterly or more frequently, pursuant to section 64534.2, 64534.4, or 64534.6, shall report to the State Board within 10 days after the end of each quarter in which samples were collected according to section

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64469(c), notwithstanding the provisions of sections 64469(a) and (b). Systems required to sample less frequently than quarterly shall report to the State Board within 10 days after the end of each quarter in which samples were collected. Systems shall report information to the State Board in conformance with the requirements of sections 64537.2, 64537.4, and 64537.6…

Title 22, CCR, Section 64537.2 states in relevant parts:

Section 64537.2. Disinfection Byproducts Reporting.

Systems shall report to the State Board the information specified in tables 64537.2-A and 64537.2-B…

Table 64537.2-B TTHM and HAA5 Reporting

If the system is monitoring under the requirements of section 64534.2(d) for...	***The system shall report...***
TTHM and HAA5	(a) For each monitoring location: (1) The number of samples taken during the last quarter; (2) The date and results of each sample taken during the last quarter; (3) The arithmetic average of quarterly results for the last four quarters (LRAA); (4) Whether the LRAA calculated based on fewer than four quarters of data would cause the MCL to be exceeded regardless of the monitoring results of subsequent quarters; (5) Whether, based on section 64535.2(e), the MCL was violated at any monitoring location; and (6) Any operational evaluation levels that were exceeded during the quarter and, if so, the location and date, and the calculated TTHM and HAA5 levels.
	(b) For a supplier using approved surface water and seeking to qualify for or remain on reduced TTHM/HAA5 monitoring, source water TOC information for each treatment plant that treats approved surface water: (1) The number of source water TOC samples taken each month during the last quarter; (2) The date and result of each sample taken during the last quarter; (3) The quarterly average of monthly samples taken during the last quarter or the result of the quarterly sample; and (4) The running annual average (RAA) of quarterly averages from the past four quarters; and (5) Whether the RAA exceeded 4.0 mg/L.

STATEMENT OF FACTS

Background

The District's water system is a community water system supplying water for domestic purposes to approximately 6,813 people through 1,488 unmetered service connections in portions of the City of Compton and Willowbrook, an unincorporated area of the Los Angeles County. The service area is a residential community composed of single-family houses. A copy of the service area map is attached (Attachment 1). The District operates the water system under the authority of a

domestic water supply permit (Permit Number 04-22-12P-009) issued by the Division on August 30, 2012.

The sources of supply for District's water system include three wells and one emergency interconnection with the City of Compton. The District's distribution system is comprised of one pressure zone with system pressure ranging from 45 to 70 psi. Water produced by the wells is disinfected with chlorine gas and pumped to the hydro-pneumatic tanks before being distributed to the system. The system has neither booster pumps nor storage tanks.

Pursuant to Section 64530 (d) and Section 64534.2 (d) (1) of Title 22, CCR, the District is required to collect two dual sample sets per year for total trihalomethane (TTHM) and haloacetic acids (HAA5) analysis during the period starting October 1, 2013. On June 22, 2010, the District submitted to the Division the Initial Distribution System Evaluation Report for Standard Monitoring (IDSE Report) and Stage 2 Disinfectants and Disinfection Byproducts Rule (DBPR) Compliance Monitoring Plan (CMP). Subsequent revisions to the IDSE Report and CMP were made on July 13, 15 and 21, 2010. On July 22, 2010, the Division approved the revised IDSE Report and Stage 2 DBPR CMP. The District listed 2423 East Bliss Street and 2045 East 131st Street as the Stage 2 DBPR Compliance Monitoring Sites (Attachment 2). According to the approved Stage 2 DBPR CMP, beginning in 2014, the District must collect TTHM and HAA5 samples from the above two sites during the second week of July each year. Pursuant to Section 64537 (a) and Section 64537.2 of Title 22, CR, the District must also submit a report summarizing the TTHM and HAA5 monitoring results and the compliance status to the Division by October 10 each year.

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Summary of Events

Friday, September 5, 2014

The Division issued a warning letter (Attachment 3) to the District for the failure to collect the TTHM and HAA5 samples in accordance with the approved Stage 2 DBPR CMP. Based on the approved plan, the first sets of samples should have been collected during the second week of July 2014 (July 7 - 11, 2014) from the two approved Stage 2 DBPR sites, namely, 2423 East Bliss Street and 20145 East 131st Street. However, the District collected the samples on July 2, 2014 from 730 139th Street and 13013 Mona Street. These sites are approved monitoring locations for Stage 1 DBPR, not for Stage 2 DBPR. The samples were collected by Jonathan Dredd.

Monday, June 1, 2015

The Division received an email from Mr. Dredd indicating that Mr. Robert Jarvis was no longer with the District and that he had assumed the position as the Chief Operator.

Thursday, June 4, 2015

Mr. Jarvis notified the Division via an e-mail that his last day with the District was May 29, 2015.

Monday, June 8, 2015

The Division received an email inquiry from Mr. Dredd on what he needed to do to stay in compliance. Ms. Ofelia Oracion, a Sanitary Engineer with the Division, informed him that the water quality reports for the month of May 2015 must be submitted to the Division by June 10, 2015. Ms. Oracion told Mr. Dredd that she could

explain to him how to prepare the reports, if he would visit the Division's Glendale Office.

Thursday, June 11, 2015

At around 8:30 in the morning, Ms. Oracion sent an email to Mr. Thomas Martin, the District's General Manager, informing him that the May 2015 Monthly Water Quality Compliance Reports had not been received by the Division. The reports should have been submitted by June 10, 2015. In the afternoon, Mr. Dredd submitted the reports via facsimile. However, the reports were incomplete. Ms. Oracion called Mr. Dredd and again offered the technical assistance. The meeting was set on June 15, 2015.

Monday, June 15, 2015

At around 10 o'clock in the morning, Ms. Oracion met with Mr. Dredd at the Division's Glendale Office. Ms. Oracion showed Mr. Dredd the reports that must be submitted on monthly and quarterly basis and provided him with copies of the District's previous reports for his references. After the meeting, Ms. Oracion emailed Mr. Dredd several water quality reporting forms, including Chlorine and Chloramine Reporting Form, Raw Water Coliform Monitoring Summary Form, General Physical Summary Form and Monthly Summary of Distribution System Coliform Monitoring Form.

Ms. Oracion also reminded Mr. Dredd of the upcoming Stage 2 DBPR compliance monitoring. Because the District had previously failed to collect the samples at the right locations and time; in one of the e-mails, Ms. Oracion advised Mr. Dredd the sampling schedule and the sampling locations for the TTHM and HAA5 samples (Attachment 4).

Friday, July 24, 2015

The Division received the laboratory results for TTHM and HAA5. The samples were collected by Mr. Dredd on July 8, 2015. Although the District had collected the samples within the period specified in the approved plan, these samples were collected from locations different from the sites identified in the approved plan. Instead of collecting the samples from 2423 East Bliss Street and 2045 East 131st Street, the samples were again collected from 730 139th Street and 13013 Mona Street (Attachment 5).

Monday, October 19, 2015

Naira Ghukasyan, an Environmental Scientist with the Division informed Mr. Martin via e-mail that the Division had not received the District's 2015 Annual Stage 2 TTHM/HAA5 Summary Form, in addition to other reporting errors. Ms. Ghukasyan also attached a blank copy of the summary form to the e-mail.

Thursday, October 22, 2015

In response to Mr. Ghukasyan's e-mail, Mr. Dredd contacted Mr. Ghukasyan to discuss. However, Mr. Dredd indicated he had not received the summary form. Ms. Ghukasyan forwarded to Mr. Dredd the October 19, 2015 e-mail to Mr. Martin (Attachment 6).

Up to date, the Division still has not received the 2015 Annual Stage 2 TTHM/HAA5 Summary Form nor the laboratory reports for TTHM/HAA5 samples collected from the Stage 2 sampling locations in July 2015 from the District.

DETERMINATIONS

The Division has determined that the District is in violation of Sections 64532 (g), 64534.2 (d), 64534.8, 64537 (a) and 64537.2 of Title 22, CCR due to the failure to monitor in accordance with the District's Stage 2 DBPR Compliance Monitoring Plan and the failure in submitting the 2015 Annual Stage 2 TTHM/HAA5 Summary Form to the Division by October 10, 2015.

DIRECTIVES

The District is hereby directed to take the following actions:

1. Institute internal control mechanism(s) to ensure all compliance samples are collected per the approved plan in a timely manner. The District shall develop a plan to improve its water quality monitoring program and submit the plan to the Division by **December 31, 2015**.

2. Provide on-going training to staff responsible for overseeing the compliance with monitoring and reporting requirements and staff responsible for sample collection duties. By March 30, 2016, the District must submit a letter listing the names of the trainees, contents of the training sections (courses), and dates and locations of these training sections provided. If in-house training is used, information regarding the experiences and qualifications of the instructors shall also be provided. The training courses must be related to water quality monitoring, reporting and notification regulations.

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3. Notify all persons served by the District of the TTHM and HAA5 monitoring violation in conformance with Section 64463.7 Tier 3 Public Notice, and Section 64465 Public Notice Content and Format of Title 22, CCR. Within one year of receiving this citation, the District shall complete the notification. The District shall deliver the notice to each customer receiving a bill by mail or direct delivery. In addition, the District must use one or more of the following methods to reach persons not likely to be reached by a mailing or direct delivery (renters, university students, nursing home patients, prison inmates, etc.): 1) publication in a local newspaper, 2) posting in conspicuous public places served by the water system, or on the internet; or 3) delivery to community organizations. A template for the Tier 3 public notice is attached (Attachment 7). The content of the notice shall be approved by the Division prior to issuance. A copy of the notification shall be submitted to the Division within **10 days of issuance**, along with the enclosed proof of notification form (Attachment 8).

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

Nothing in this Citation relieves the District of its obligation to meet the requirements of H&S Code, Division 104, Part 12, Chapter 4 (California Safe Drinking Water Act), or any regulation, permit, standard or order issued or adopted thereunder.

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

Shu-Fang Orr, P.E.
District Engineer, Angeles District
Southern California Drinking Water Field Operations Branch
Division of Drinking Water, State Water Resources Control Board
500 North Central Avenue, Suite 500
Glendale, CA 91203

PARTIES BOUND

This Citation shall apply to and be binding upon the District, its officers, managers, agents, employees, contractors, successors and assignees.

SEVERABILITY

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

FURTHER ENFORCEMENT ACTION

Division 104, Part 12, Chapter 4, (commencing with Section 116270) of the H&S Code authorizes the Division to issue additional citations with assessment of penalties if a public water system continues to fail to correct a violation identified in a citation; 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 orders of the Division; and petition the superior court to take various enforcement measures against a public water system that has failed to comply with orders of the Division. By issuance of this citation, the Division does not waive any right to take

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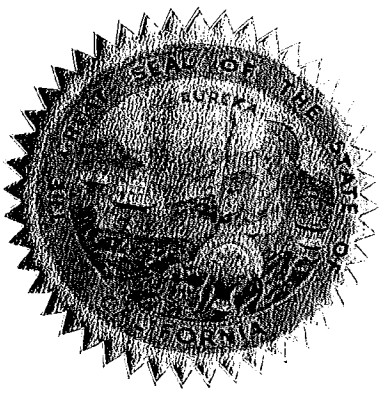
further enforcement action against the District including but not limited to the assessment of civil penalties as authorized by law.

November 16, 2015
Date

Shu-Fang Orr
Shu-Fang Orr, P.E.
District Engineer
Angeles District
Drinking Water Field Operations Branch



Attachments (8):

1. Service Area Map
2. Stage 2 DBPR Compliance Monitoring Plan
3. The Division's Warning Letter to the District dated September 5, 2014
4. The Division's E-mail dated June 15, 2015
5. The Laboratory Results for TTHM and HAA5 for samples Collected on July 8, 2015
6. The Division's E-mails dated October 19 and October 22, 2015
7. Tier 3 Public Notice Template
8. Public Notification Certification

BY CERTIFIED MAIL NO. 7014 2870 0001 2130 1359

Service Area Map

COUNTY WATER DISTRICT
SERVICE BOUNDARIES

Stage 2 DBPR Compliance Monitoring Plan

Jul 21 10 11:16a CDPH Drinking Water 213 580-5711 p.2

Stage 2 DBPR Monitoring Plan

Stage 2 Compliance Monitoring Site ID	Site Type	Justification	Projected Sampling Date (month/day/year) * Period 1	Period 2	Period 3	Period 4
2423 East Bliss Street	X Highest TTHM __ Highest HAA5 __ Stage 1 DBPR __ Other	THE HIGHEST TTHM IS 6.3 ppb OBTAINED FROM THE LRAA	7/7/~~2014~~ 14	7/7/15	7/7/16	7/7/17
2045 East 131st Street	__ Highest TTHM X Highest HAA5 __ Stage 1 DBPR __ Other	THE HIGHEST HAA5 IS 3.4 ppb OBTAINED FROM THE LRAA	7/7/14	7/7/15	7/7/16	7/7/17

** Period = monitoring period. Complete for the number of monitoring periods required for your system.*

Compliance Calculation Procedures

✓ Monitor yearly, compliance calculated as sample result < MCL for each location

__ Monitor quarterly, compliance calculated as LRAA = (Q1+Q2+Q3+Q4)/4 < MCL for each location

__ Monitor more frequently than quarterly. Compliance calculated as follows:

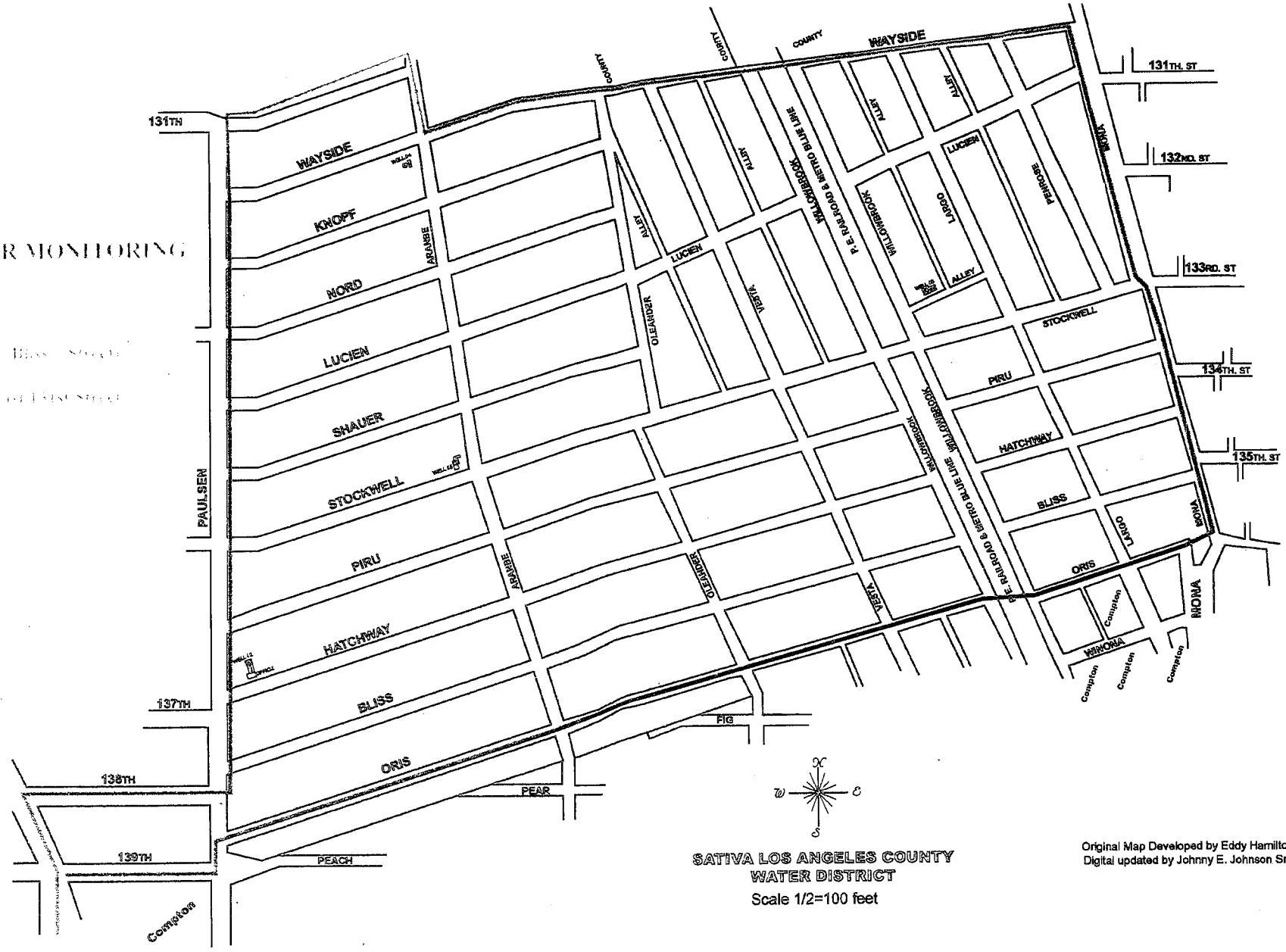
* SATIVA L.A. COUNTY WATER WILL COLLECT QUARTERLY SAMPLE WHEN SAMPLE EXCEED MCL.

* COMPLIANCE WILL BE CALCULATED AS LRAA = $(Q_1 + Q_2 + Q_3 + Q_4)/4$ < MCL FOR EACH LOCATION

Combined Distrubtion System Information

__ This PWS is part of a combined distrubution system

If Checked: __ Monitoring Requirements have been reduced by State and monitoring plans for other systems are attached.



STAGE 2 DBPR MONITORING

SATIVA LOS ANGELES COUNTY WATER DISTRICT

Distribution System Stage 2 DBPR Monitoring

SATIVA LOS ANGELES COUNTY
WATER DISTRICT
Scale 1/2=100 feet

Original Map Developed by Eddy Hamilton 1960
Digital updated by Johnny E. Johnson Sr. 2001

The Division's Warning Letter to the District dated September 5, 2014

State Water Resources Control Board
Division of Drinking Water

September 5, 2014

Mr. Robert Jarvis
Interim Chief Operator
Sativa Los Angeles County Water District
2015 E. Hatchway St.
Compton, CA 90222-3519

Dear Mr. Jarvis:

SYSTEM NO. 1910147 – STAGE 2 DISINFECTANTS AND DISINFECTION BYPRODUCTS RULE (DBPR) MONITORING

It has come to the Division of Drinking Water's (Division) attention that the Sativa Los Angeles County Water District (District) has violated the monitoring requirements of Stage 2 Disinfection By-Products Rule (DBPR). Specifically, the District failed to collect the total trihalomethanes (TTHM) and five haloacetic acids (HAA5) samples from the two approved Stage 2 DBPR monitoring sites on July 7, 2014.

The District's water system is classified as a Schedule 4 system under the Stage 2 DBPR, and therefore, must comply with the Stage 2 DBPR monitoring requirements beginning in July 2014. The District's Stage 2 DBPR Monitoring Plan, which was approved by the Division on July 22, 2010, specified the collection of two dual sample sets per year for TTHM and HAA5 analysis. These samples must be collected from the following sites: 2423 East Bliss Street and 2045 East 131st Street. Based on the approved plan, the first sets of Stage 2 DBPR samples should have been collected on July 7, 2014.

On July 2, 2014, the District collected two sets of samples for TTHM and HAA5 analysis from 730 139th Street and 13013 Mona Street. These sites are the approved monitoring locations for the Stage 1 DBPR, not for the Stage 2 DBPR.

During the period from May through July 2014, the District has only one certified operator, Mr. Jonathan Dredd. Mr. Dredd had to oversee the operation of the water system, respond to emergencies, collect the water quality samples, and prepare the monthly reports, among others. Reportedly, Mr. Dredd thought the samples he collected on July 2, 2014 were for the Stage 2 DBPR monitoring compliance.

On August 4, 2014, you were hired by the District as Interim Chief Operator. During a meeting with you on August 13, 2014, you requested the Division to allow the District a chance to collect the make-up samples. On August 13, 2014, the District sent an email to the Division and reported that the two dual sample sets have been collected (enclosed). In view of the District's effort in collecting the make-up samples promptly, the Division has decided not to take a formal

enforcement action this time. However, please be advised that if the District fails the monitoring requirement again, the Division will take a formal enforcement action against the District.

The above monitoring violation is preventable, if the staff in charge of monitoring and reporting duty understood the regulations, followed the monitoring plans and tracked the compliance deadlines diligently. As such, the staff(s) must receive extensive trainings to fully understand the monitoring and reporting requirements of Title 22, CCR, and their roles and responsibilities. **By December 31, 2014, the District must submit a letter listing the names of the trainees, contents of the training sections (course), and dates and locations of the training sections provided. The training courses must be related to water quality monitoring, reporting and notification regulations.**

If you have any questions, please contact Ms. Ofelia Oracion at (818) 551-2020 or me at (818) 551-2045.

Sincerely,

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

cc: Mr. Luis Landeros
President, Board of Directors
Sativa Los Angeles County water District
2015 E. Hatchway St.
Compton, CA 90222-3519

Mr. John Mundy
Sativa Los Angeles County water District
2015 E. Hatchway St.
Compton, CA 90222-3519

The Division's E-mail dated June 15, 2015

Oracion, Ofelia@Waterboards

From: Oracion, Ofelia@Waterboards
Sent: Monday, June 15, 2015 3:02 PM
To: jdredd@sativawd.com
Cc: Tmartin (tmartin@sativawd.com)
Subject: Stage 2 DBPR

Hi Jonathan,

Sativa's Stage 2 DBPR monitoring compliance requires to sample for TTHM and HAA5 every second week of July each year. For this 2015 year, you will need to collect the samples during the week of July 6, 2015 (or between Monday and Friday of July 6 – 10, 2015) from the following sample sites:

- 2423 East Bliss Street
- 2045 East 131st Street

Please make sure to follow the schedule as approved.

Thanks,

Ofelia Oracion
Sanitary Engineer, Angeles District
Division of Drinking Water, State Water Resources Control Board
California Environmental Protection Agency
T: (818) 551-2020 | F: (818) 551-2054 | E: Ofelia.Oracion@waterboards.ca.gov
500 North Central Avenue, Suite 500, Glendale, CA 91203

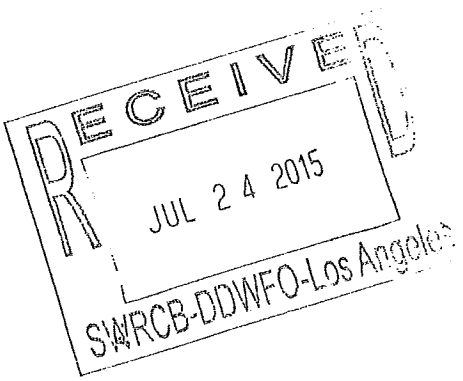
The Laboratory Results for TTHM and HAA5 for Samples Collected on July 8, 2015

Clinical Laboratory of San Bernardino, Inc.

Sativa L.A. County Water	Project: Routine	Work Order: 15G0870
2015 E Hatchway St	Sub Project: Coliform, Gen. Physical	Received: 07/08/15 16:50
Compton CA, 90222	Project Manager: Water Quality Supervisor	Reported: 07/17/15

730 139th Street **15G0870-01 (Water)** **Sample Date:** 07/08/15 9:35 **Sampler:** Jonathan Dredd

Analyte	Method	Result	Units	Rep. Limit	MCL	Prepared	Analyzed	Batch	Qualifier
Field Analyses									
Cl Res Free (Field)	Field	**0.97**	mg/L			07/08/15	07/08/15	1528521	
Trihalomethanes Analyses									
Bromodichloromethane	EPA 524.2	**1.2**	ug/L	1.0		07/09/15	07/10/15	1528502	
Bromoform	EPA 524.2	**1.5**	ug/L	1.0		07/09/15	07/10/15	1528502	
Chloroform (Trichloromethane)	EPA 524.2	ND	ug/L	1.0		07/09/15	07/10/15	1528502	
Dibromochloromethane	EPA 524.2	**2.4**	ug/L	1.0		07/09/15	07/10/15	1528502	
Total Trihalomethanes (TTHM)	EPA 524.2	**5.1**	ug/L	1.0	80	07/09/15	07/10/15	1528502	
Surrogate: 1,2-Dichlorobenzene-d4	*EPA 524.2*	*77 %*				*07/09/15*	*07/10/15*	*1528502*	
Surrogate: Bromofluorobenzene	*EPA 524.2*	*90 %*				*07/09/15*	*07/10/15*	*1528502*	
Haloacetic Acids Analyses									
Dibromoacetic Acid	EPA 552.2	ND	ug/L	1.0		07/13/15	07/13/15	1529005	
Dichloroacetic Acid	EPA 552.2	ND	ug/L	1.0		07/13/15	07/13/15	1529005	
Monobromoacetic Acid	EPA 552.2	ND	ug/L	1.0		07/13/15	07/13/15	1529005	
Monochloroacetic Acid	EPA 552.2	ND	ug/L	2.0		07/13/15	07/13/15	1529005	
Trichloroacetic Acid	EPA 552.2	ND	ug/L	1.0		07/13/15	07/13/15	1529005	
Total Haloacetic Acids (HAA5)	EPA 552.2	ND	ug/L	1.0	60	07/13/15	07/13/15	1529005	
Surrogate: 2,3-Dibromopropionic Acid	*EPA 552.2*	*97 %*				*07/13/15*	*07/13/15*	*1529005*	



Clinical Laboratory of San Bernardino, Inc.

Sativa L.A. County Water	Project: Routine	Work Order: 15G0870
2015 E Hatchway St	Sub Project: Coliform, Gen. Physical	Received: 07/08/15 16:50
Compton CA, 90222	Project Manager: Water Quality Supervisor	Reported: 07/17/15

13013 Mona St **15G0870-05 (Water)** **Sample Date:** 07/08/15 9:58 **Sampler:** Jonathan Dredd

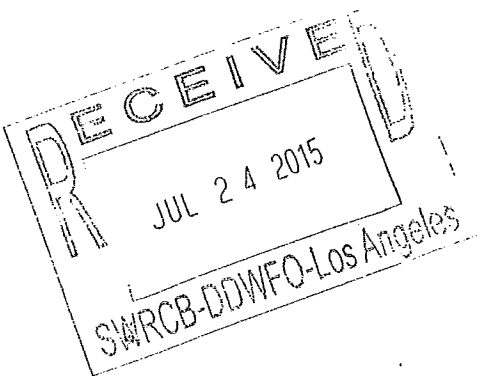
Analyte	Method	Result	Units	Rep. Limit	MCL	Prepared	Analyzed	Batch	Qualifier
Field Analyses									
Cl Res Free (Field)	Field	**0.37**	mg/L			07/08/15	07/08/15	1528521	
Trihalomethanes Analyses									
Bromodichloromethane	EPA 524.2	**1.2**	ug/L	1.0		07/09/15	07/10/15	1528502	
Bromoform	EPA 524.2	**2.3**	ug/L	1.0		07/09/15	07/10/15	1528502	
Chloroform (Trichloromethane)	EPA 524.2	ND	ug/L	1.0		07/09/15	07/10/15	1528502	
Dibromochloromethane	EPA 524.2	**2.7**	ug/L	1.0		07/09/15	07/10/15	1528502	
Total Trihalomethanes (TTHM)	EPA 524.2	**6.2**	ug/L	1.0	80	07/09/15	07/10/15	1528502	
Surrogate: 1,2-Dichlorobenzene-d4	*EPA 524.2*	*81 %*				*07/09/15*	*07/10/15*	*1528502*	
Surrogate: Bromofluorobenzene	*EPA 524.2*	*81 %*				*07/09/15*	*07/10/15*	*1528502*	
Haloacetic Acids Analyses									
Dibromoacetic Acid	EPA 552.2	ND	ug/L	1.0		07/13/15	07/13/15	1529005	
Dichloroacetic Acid	EPA 552.2	ND	ug/L	1.0		07/13/15	07/13/15	1529005	
Monobromoacetic Acid	EPA 552.2	ND	ug/L	1.0		07/13/15	07/13/15	1529005	
Monochloroacetic Acid	EPA 552.2	ND	ug/L	2.0		07/13/15	07/13/15	1529005	
Trichloroacetic Acid	EPA 552.2	ND	ug/L	1.0		07/13/15	07/13/15	1529005	
Total Haloacetic Acids (HAA5)	EPA 552.2	ND	ug/L	1.0	60	07/13/15	07/13/15	1529005	
Surrogate: 2,3-Dibromopropionic Acid	*EPA 552.2*	*75 %*				*07/13/15*	*07/13/15*	*1529005*	

ND Analyte NOT DETECTED at or above the reporting limit

Pamela Ybarra

Pamela Ybarra

Project Manager



Clinical Laboratory of San Bernardino, Inc.

Chain of Custody

1560870 4/1/4

Client	Sativa L.A. County Water District	Client Job No.
Address	2015 E Hatchway St Compton, CA 90222	
System #	CA1910147	Destination Laboratory
Phone No.	(310) 631-8176 FAX No. (310) 632-5492	[X] Clinical Laboratory
Project		[ ] Other:
Sampled By	Jonathan Dredd	
Comments	Coliform, Gen. Physical	
TAT: ( ) 10 Day ( ) 5 Day ( ) 48 Hr. ( ) 24 Hr		
Not all analyses can be processed as rush		

Date	Time	Sample Identification	Matrix	No.	Pres.	Coliform Bacterial	General Physical No. 5	Stage 2 D/DBP	Lead and Copper									Free Cl2
7/8	9:35am	730 139th Street (3)	DW	1	1,7,4	X		x										0.97
7/8	9:43am	2016 Lucien Street (2)	DW	2	1,7	X	x											0.95
7/8	10:09am	13122 Largo Street (1)	DW	3	1,7	X												0.88
7/8	10:15am	2315 Bliss Street (1)	DW	4	1,7	X												0.54
			DW	5	7													N/A
7/8	9:58am	13013 Mona Blvd (2)			1,4			x										0.37
		WELL # 2			7													N/A
		WELL # 3			7													N/A
		WELL # 5			7													
		Gen Physical minimum of 2 samp/mon																

RECEIVED JUL 24 2015 SAN B. DW/FC LOS ANGELES

Preservatives: (1) $Na_2S_2O_3$ (2) HCl (3) HNO3 (4) NH4Cl (5) H2SO4 (6) Na2SO3 (7) Cold (8) Other:

Matrix: DW-Drinking Water, WW-Waste Water, SW-Storm Water, GW- Ground Water, S- Solid

Relinquished By (Sign)	Print Name / Company	Date / Time	Received By (Sign)	Print Name / Company
Jonathan Dredd	Jonathan Dredd	7/8/2015		CLSB
M Cid	CLSB	7/9/15 4:50		

Comments:

Samples received: (X) On ice (X) Intact ( ) Custody seals
Temp 4 ( ) F (0) C

Shipped Via [ ] Fed X [ ] Golden State [ ] UPS [ ] Client [ ] Other

The Division's E-mails dated October 19 and October 22, 2015

Orr, Shu-Fang@Waterboards

From: Ghukasyan, Naira@Waterboards on behalf of WB-DWPDIST22
Sent: Friday, November 06, 2015 9:10 AM
To: Orr, Shu-Fang@Waterboards
Subject: FW: Sativa Water Quality Reports
Attachments: Quarterly_Chlorine or Chloramines Reporting Form.xls; Annual_Stage 2 Spreadsheet..xls

fyi

From: Ghukasyan, Naira@Waterboards
Sent: Thursday, October 22, 2015 11:28 AM
To: 'jdredd@sativawd.com'
Subject: FW: Sativa Water Quality Reports

From: Ghukasyan, Naira@Waterboards
Sent: Monday, October 19, 2015 10:55 AM
To: 'tmartin@sativawd.com'
Subject: Sativa Water Quality Reports

Hello Thomas,

While I was reviewing June water quality reports for Sativa, I've notice several discrepancies in the summary forms.
I was on medical leave since May and just got back to work and because of that, last report from Sativa I had reviewed, was April.
I went back and start checking reports starting from May and here what I found:

1. *TCR summary forms* need to be revised: on this form you need to include only distribution routine/repeat samples So, total number of samples always should be 16 or 20 (depends on the number of weeks in the month). Please correct all *TCR summary forms* from May to September. (during September Sativa did not have coliform positive sample in the distribution system, only in the source)
2. Starting from July you haven't submit *Chlorine Residual Summary form*. You can sent only the last one, for September, which should include the missing months.

3. *Raw Water summary form* for September need to be revised: Well #3 was sampled twice (with 1 TC positive and 1 TC negative results).

4. *General Physical forms* need to be revised: Started from May, results were reported incorrectly- on the summary form, results were not entered for correct locations. Besides, starting from August to September, samples haven't been taken according to the approved sample site plan. In the future, please, follow the approved sample site plan.

5. *2015 3rd quarter Chlorine Disinfectant Residuals Summary form* needs to be revised. I actually prepared the correct form myself; just sign and send back to me (see attachment).
6. *2015 the Annual Stage 2 TTHM/HAA5 summary form* was not submitted, we received only lab reports. I have attached the blank stage 2 form for your convenience.

Please, send to us all revised and missing summary forms with the corresponding signatures as soon as possible.

If you have any questions, please let me know.

Thank you,

Naira Ghukasyan
Environmental Scientist
Division of Drinking Water
State Water Resources Control Board
500 North Central Avenue, Suite 500
Glendale, CA 91203
Phone: (818) 551-2021/ Fax: (818) 551-2054
Email: Naira.Ghukasyan@waterboards.ca.gov

State of California
Drinking Water Program

Department of Public Health

Quarterly Report for Disinfectant Residuals Compliance For Systems Using Chlorine or Chloramines

System Name: SATIVA LA COUNTY WATER DISTRICT System No.: 1910147

Calendar Year: 2015 Quarter: 3rd

1st Quarter

	Month	Number of Samples Taken	Monthly Ave. Chlorine Level (mg/L)
Previous Year	April		1.03
	May		1.38
	June		1.28
	July		1.12
	August		1.05
	September		1.20
	October		1.28
	November		1.06
	December		1.13
Current Year	January	16	0.96
	February	16	0.96
	March	16	0.81
Running Annual Average (RAA):			1.11
Meets standard? (i.e. RAA ≤ MRDL of 4.0 mg/L as Cl_2)			☑ Yes ☐ No

2nd Quarter

	Month	Number of Samples Taken	Monthly Ave. Chlorine Level (mg/L)
Previous Year	July		1.12
	August		1.05
	September		1.20
	October		1.28
	November		1.06
	December		1.13
Current Year	January		0.96
	February		0.96
	March		0.81
	April	20	1.20
	May	16	1.24
	June	16	0.98
Running Annual Average (RAA):			1.08
Meets standard? (i.e. RAA ≤ MRDL of 4.0 mg/L as Cl_2)			☑ Yes ☐ No

3rd Quarter

	Month	Number of Samples Taken	Monthly Ave. Chlorine Level (mg/L)
Previous Yr	October		1.28
	November		1.06
	December		1.13
Current Year	January		0.96
	February		0.96
	March		0.81
	April		1.20
	May		1.24
	June		0.98
	July	16	0.95
	August	16	1.31
	September	20	1.01
Running Annual Average (RAA):			1.07
Meets standard? (i.e. RAA ≤ MRDL of 4.0 mg/L as Cl_2)			☑ Yes ☐ No

4th Quarter

	Month	Number of Samples Taken	Monthly Ave. Chlorine Level (mg/L)
Current Year	January		0.96
	February		0.96
	March		0.81
	April		1.20
	May		1.24
	June		0.98
	July		0.95
	August		1.31
	September		1.01
	October		
	November		
	December		
Running Annual Average (RAA):			
Meets standard? (i.e. RAA ≤ MRDL of 4.0 mg/L as Cl_2)			☐ Yes ☐ No

Comments:

Signature: _____ Date: _____

1/9/02

STAGE 2 DISINFECTION BYPRODUCT RULE
TOTAL TRIHALOMETHANE (TTHM) AND HALOACETIC ACID (HAA5)
ANNUAL SUMMARY REPORT

Water System Name: Sativa LA County Water District

System No. 1910147

	TTHM (ppb)		HAA5 (ppb)	
Sample Date (month/date/year):	Annual	Meets Standard? (Y/N)*	Annual	Meets Standard? (Y/N)*
SITE1 - 2423 EAST BLISS STREET				
SITE2 - 2045 EAST 131ST STREET				

Comments:

Note: If any of your TTHM or HAA5 result does **not** meet the standard, you must immediately begin Quarterly monitoring and use the Quarterly TTHM and HAA5 Summary Report Form. The first quarter result should be the TTHM or HAA5 result that exceeded the MCL.

Name & Title of Person Submitting Report

Date

TTHM MCL = 0.080 mg/L and HAA5 MCL = 0.060 mg/L

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 Division for approval prior to distribution or posting, unless otherwise directed by the Division [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.

If You Are a…	*You Must Notify Consumers by…*	*…and By One or More of the Following Methods to Reach Persons Not Likely to be Reached by the Previous Method…*
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 Report[1]. 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 procedure violations and notification language in italics unchanged. This language is mandatory [64465].

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

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.

Contaminant	*Required Sampling Frequency*	*Number of Samples Taken*	*When All Samples Should Have Been Taken*	*When Samples Were or Will Be Taken*
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

Spanish. Each public notice must contain information in Spanish regarding (1) the importance of the notice or (2) contain a telephone number or address where Spanish-speaking residents may contact the water system to obtain a translated copy of the public notice or assistance in Spanish.

Non-English Speaking Groups Other than Spanish-Speaking. For each group that exceeds 1,000 residents or 10% of the residents in the community served, whichever is less, the public notice must (1) contain information in the appropriate language(s) regarding the importance of the notice or (2) contain a telephone number or address where such residents may contact the water system to obtain a translated copy of the notice 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 Division within ten days after you issue the notice [64451(d)]. You should also issue a follow-up notice in addition to meeting any repeat notice requirements the Division 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 Sativa Los Angeles County Water District

Our water system failed to monitor as required for drinking water standards recently 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 is being done to correct this situation.

(Brief description of the violation)

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 recently, 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 taken.

Contaminant	*Required Sampling Frequency*	*Number of Samples Taken*	*When All Samples Should Have Been Taken*	*When Samples Were Taken*

- 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 the violation and corrective actions taken.)

For more information, please contact Mr./Ms. XXX at (XXX) XXX-XXX or (provide 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 the Sativa Los Angeles County Water District.

State Water System ID#: 1910147. Date distributed: _____.

Public Notification Certification

PROOF OF NOTIFICATION

Name of Water System: **Sativa Los Angeles County Water District**

System Number: 1910147

Certification of Notification for Monitoring Violation

As required by *California Code of Regulations,* Title 22, Section 64463.7, *Tier 3 Public Notice*, I notified the users of the water supplied by the Sativa Los Angeles County Water District of the violation of Sections 64534 (g), 64534.2 (d) and 64534.8 of Title 22, *California Code of Regulations*. I complied with the requirement to conduct public notification as indicated below:

Required Action (indicate all that were used)	Date Completed
Public Notification – Hand Delivery	
Public Notification - Mail Delivery	
Public Notification – Continuous Posting	
Public Notification - Consumer Confidence Report	
Public Notification - Other method	

Specify other method used: _____

_____ _____

Signature of Water System Representative Date

ATTACH A COPY OF THE NOTICE USED.

THIS FORM MUST BE COMPLETED AND RETURNED TO THE DIVISION