

# State Water Resources Control Board

## Citation

April 16, 2025

Hao Van (Jonathan) Le  
Precision Enviro-Tech  
3935 North Coronado Avenue  
Stockton, CA 95204

Certificate No. 2387

Dear Jonathan Le:

Pursuant to the California Environmental Laboratory Accreditation Act, Health and Safety Code section 100880, *et seq.* (ELAA), the State Water Resources Control Board's (State Water Board) Environmental Laboratory Accreditation Program (ELAP) issues this citation to Precision Enviro-Tech (PET) for violations of the ELAA and Title 22 of the California Code of Regulations (CCR).

On September 24, 2024, ELAP investigators conducted an on-site investigation of PET and its satellite field office located in Twain Harte. The owner and technical manager of PET, Jonathan Le, cooperated with ELAP investigators and confirmed that PET was performing regulatory testing for unaccredited EPA 524.2 analytes. According to Mr. Le, PET stopped EPA 524.2 regulatory testing after April 2024 and began contracting EPA 524.2 samples to other laboratories. This excludes the trihalomethanes (Bromodichloromethane, Bromoform, Chloroform, and Dibromochloromethane), which PET was accredited for.

On December 10, 2024, Mr. Le provided copies of PET's sample receipt logbook and chain of custody records for all EPA 524.2 and EPA 524.4 analyses performed by PET between April 1, 2023, and April 25, 2024.

Upon inspection of PET's sample receipt logbook, ELAP concluded that PET performed regulatory testing of unaccredited EPA 524.2 analytes (e.g. 1,2-Dichloroethane), between May 17, 2023, and April 25, 2024. By matching PET's sample receipt logbook with data uploaded to the California Laboratory Intake Portal (CLIP), ELAP determined that PET performed 28 work orders for unaccredited EPA 524.2 analytes.

The administrative penalty assessed against PET is \$7,000.00 for performing analyses without accreditation. Please note that there are legally enforceable deadlines associated with this citation.

**Violation:**

**PET performed regulatory analyses for certain analytes under EPA 524.2 but did not hold ELAP accreditation for those analytes. This is in violation of Health and Safety Code section 100825 subdivision (b).**

*Health and Safety Code section 100825 subdivision (b) requires:*

*“Laboratories that perform analyses on any combination of environmental samples, or raw or processed agricultural products for regulatory purposes shall obtain a certificate of accreditation pursuant to this article.”*

The Table below documents PET performing regulatory analyses without holding the required ELAP accreditation. The Table uses data set forth in PET’s sample receipt logbook and data uploaded to CLIP:

<b>Date Received</b>	<b>Client</b>	<b>PET Work Order</b>
5/17/2023	Dodge Ridge Resort Camps (CA5500168)	2305304
5/22/2023	Sierra Outdoor School/Clovis USD (CA5500171)	2305349
5/23/2023	Ola Rambling Hills (CA5500243)	2305371
5/23/2023	Slide Inn/Snow Bowl WC	2305379
6/14/2023	Evergreen Lodge (CA5500089)	2306234
7/7/2023	Twain Harte Community Services District (CA5510005)	2307086
7/7/2023	Twain Harte Community Services District (CA5510005)	2307090
7/7/2023	Twain Harte Community Services District (CA5510005)	2307091
7/11/2023	Fire Fall Ranch (CA5500357)	2307131
7/30/2023	Columbia MHP (CA5500149)	2307472
8/7/2023	Rawhide Investment (CA5500071)	2308105
9/13/2023	Evergreen Lodge (CA5500089)	2309191
10/27/2023	Alpine Acres MWC (CA5500041)	2310508
11/6/2023	Twain Harte Community Services District (CA5510005)	2311050
11/6/2023	Fire Fall Ranch (CA5500357)	2311052
11/8/2023	Pinecrest Permittees Association (CA5510004)	2311100
11/9/2023	Fire Fall Ranch (CA5500357)	2311113
11/16/2023	Fire Fall Ranch (CA5500357)	2311247
11/28/2023	Lake Don Pedro CSD (CA5510008)	2311395
12/15/2023	Sierra Village MHP (CA5500353)	2312278
12/28/2023	Bellevue Oaks MWC (CA5500042)	2312505

<b>1/15/2024</b>	Bellevue Oaks MWC (CA5500042)	2401197
<b>3/12/2024</b>	Fire Fall Ranch (CA5500357)	2403152
<b>3/13/2024</b>	Fire Fall Ranch (CA5500357)	2403178
<b>3/14/2024</b>	Evergreen Lodge (CA5500089)	2403203
<b>3/18/2024</b>	Sierra Outdoor School/Clovis USD (CA5500171)	2403234
<b>4/3/2024</b>	Rush Creek Lodge (CA5500369)	2404077
<b>4/25/2024</b>	USFS Groveland Ranger District (CA5500016)	2404441

**Civil Penalty:**

Health and Safety Code section 100880 authorizes ELAP to issue a citation for violations of the ELAA up to one thousand (\$1,000) for each day that the violation occurred.

ELAP hereby assesses upon PET an administrative penalty in the amount of \$7,000.00. The citation shall be payable to the Environmental Laboratory Improvement Fund within 30 days of receipt of this Order. The payment must include the invoice ID "2387-041625" and be mailed to:

**Environmental Laboratory Accreditation Program**

**Attn: Ngoc Luu**

**1001 I Street**

**Sacramento, CA 95814**

A process exists by which the owner of a laboratory issued a citation may petition the State Water Board for reconsideration of this citation. (Health & Saf. Code § 100880 subd. (f).) Petitions sent to the State Water Board "shall include the name and address of the petitioner, a copy of the order or decision for which the petitioner seeks reconsideration, identification of the reason the petitioner alleges the issuance of the order or decision was inappropriate or improper, the specific action the petitioner requests, and other information as the state board may prescribe. The petition shall be accompanied by a statement of points and authorities of the legal issues raised by the petition." (Health & Saf. Code, § 116701, subd. (b).) Petitions must be received by the State Water Board within **30 days** of the issuance of this citation. (*Id.*, § 116701, subd. (a)(3).) If the 30th day falls on a Saturday, Sunday, or state holiday, the petition is due the following business day by 5:00 p.m.

**Further Enforcement:**

The ELAA authorizes the State Water Board to issue an order or citation with assessment of administrative penalties for violation or continued violation of the requirements of the ELAA or any regulation or order issued or adopted pursuant to the ELAA. The ELAA also authorizes the State Water Board to take action to suspend or revoke a certificate of accreditation in addition to issuing a citation or order. The State

Water Board does not waive any further enforcement by issuance of this Citation to PET, including but not limited to enforcement related to PET performing analyses in other regulatory programs in violation of the ELAA or any regulation or order issued or adopted pursuant to the ELAA.

Should you have any technical questions or require further assistance, please contact Ngoc Luu at [ngoc.luu@waterboards.ca.gov](mailto:ngoc.luu@waterboards.ca.gov). For any legal inquiries or clarifications, please contact Samantha Ramadan, attorney with the Office of Enforcement, at [samantha.ramadan@waterboards.ca.gov](mailto:samantha.ramadan@waterboards.ca.gov).

Sincerely,

A handwritten signature in blue ink, appearing to read "Christine Sotelo".

Christine Sotelo, Program Manager  
Environmental Laboratory Accreditation Program  
Division of Drinking Water  
State Water Resources Control Board

cc: Michael Head, ELAP, SWRCB  
Ngoc Luu, ELAP, SWRCB  
Laura Mooney, Office of Enforcement, SWRCB  
Samantha Ramadan, Office of Enforcement, SWRCB  
Kim Niemeyer, Office of Chief Counsel, SWRCB  
Robert Brownwood, Program Management Branch, SWRCB  
Cynthia Holmes, US EPA Region 9  
Luis Garcia-Bakarich, US EPA Region 9