CALIFORNIA
Water Boards

EDMUND G. BROWN JR.
GOVERNOR

MATTHEW RODRIQUEZ
SECRETARY FOR
ENVIRONMENTAL PROTECTION

State Water Resources Control Board
Division of Drinking Water

April 25, 2017

Rich Ables
CSP-Hendy Woods
12301 North Highway 1, Box 1
Mendocino, CA 95460

CITATION NO. 02_03_17C_013 FOR PUBLIC WATER SYSTEM NO. 2310303
BACTERIOLOGICAL MONITORING VIOLATION

Enclosed is a citation issued to the CSP-Hendy Woods public water system (System) by the State Water Resources Control Board, Division of Drinking Water (Division) for failure to conduct triggered source monitoring in February 2017.

Because this is an enforcement action for noncompliance with State regulations, your System will be billed at the Division's hourly rate (approx. $160.00) for the time spent issuing this citation. Health and Safety Code Section 116577 provides that a public water system must reimburse the Division for actual costs incurred by the Division for specified enforcement actions, including, but not limited to, preparing, issuing, and monitoring compliance with a citation. You will receive a bill for these fees sent from our Fee Billing Unit in Sacramento.

If you have any questions regarding this matter, please contact Lori Hanson at (707) 576-2604.

Sincerely,

Sheri Miller, P.E.
Mendocino District Engineer
Division of Drinking Water

Enclosures

c: Mendocino County Environmental Health

Freddie Heldstab, 12301 North Highway 1, Box 1, Mendocino, CA 95460

2310303/ComplianceFile#4
02_03_17C_013-CvrLtr/LSH

Citation No. 02_03_17C_013

STATE OF CALIFORNIA

WATER RESOURCES CONTROL BOARD

DIVISION OF DRINKING WATER

Name of Public Water System: CSP-Hendy Woods

Water System No: 2310303

To: CSP-Hendy Woods
12301 North Highway 1, Box 1
Mendocino, CA 95460

Issued: April 25, 2017

CITATION FOR NONCOMPLIANCE

WITH TRIGGERED SOURCE MONITORING REQUIREMENTS

February 2017

The State of California Water Resources Control Board, Division of Drinking Water (hereinafter "Division") hereby issues a citation to the CSP-Hendy Woods water system (hereinafter "System") for failure to comply with Section 64430, Title 22, of the California Code of Regulations (CCR).

Chapter 4, Article 9, Section 116550 of Part 12 of Division 104 of the California Health and Safety Code (CHSC), authorizes the issuance of a citation for failure to comply with a requirement of Chapter 4 (California Safe Drinking Water Act), or any

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STATE OF CALIFORNIA
STD. 113 (REV. 3-95)

regulation, standard, permit or order issued thereunder. A copy of Applicable Statutes and Regulations is located in Appendix 3, which is attached hereto and incorporated by reference.

STATEMENT OF FACTS

CSP-Hendy Woods is classified as a transient noncommunity water system serving 3 connections with a population of approximately 225. The System collected a routine water sample on February 6, 2017 which tested positive for total coliform bacteria and negative for *E. coli* bacteria. According to Section 64424, Title 22, of the CCR, the System is required to collect a repeat sample set within 24 hours of being notified by the laboratory of the positive result. A repeat sample set for a water system collecting one sample per month (or less) is four samples. CSP-Hendy Woods collected four repeat samples on February 8, 2017. All four samples tested negative for total coliform bacteria and negative for *E. coli* bacteria.

Pursuant to Section 64430, Title 22, CCR, the System is required to collect a triggered source sample from each groundwater source in use at the time the positive routine sample was collected. As of the date of this Citation, the Division has not received results for a triggered source sample collected from the CSP-Hendy Woods groundwater source, Well 01, PS Code 2310303-001.

DETERMINATIONS

The Division has determined that the CSP-Hendy Woods water system violated Section 64430, Title 22, of the CCR in February 2017. Section 64430, Title 22, of the CCR, requires water systems to collect raw well samples from the wells in service at the time the positive routine sample was collected. CSP-Hendy Woods

failed to collect a raw well sample from the well that was in service on February 6, 2017.

DIRECTIVES

CSP-Hendy Woods is hereby directed to take the following actions:

1. Comply with Section 64430, Title 22, of the California Code of Regulations in all future monitoring periods. A copy of these regulatory sections is provided in Appendix 3.

2. Notify all persons served by the System of the February 2017 bacteriological monitoring violation no later than **May 8, 2017**. The Public Notification Template in Appendix 1 must be used to fulfill this directive. **The corrective actions section and contacts section of the template must be completed prior to notification**. Two forms of public notice are required. Notification must be completed in conformance with Sections 64463.7 and 64465, Title 22 of the CCR (copy of these sections provided in Appendix 3).

3. The System shall complete Appendix 2: Compliance Certification. Submit Appendix 2, together with copies of the **two methods** of public notification, to the Division no later than **May 15, 2017**.

4. Complete and submit a new bacteriological sampling plan, unless already completed and submitted in 2017, using the template in Appendix 4. It must be submitted to the Division no later than **May 15, 2017**.

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

State Water Resources Control Board
Division of Drinking Water - Mendocino District
50 D Street, Suite 200
Santa Rosa, CA 95404

The Division reserves the right to make such modifications to this Citation, as it deems 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 System of its obligation to meet the requirements of the California Safe Drinking Water Act (CHSC, Division 104, Part 12, Chapter 4, commencing with Section 116270), or any regulation, standard, permit or order issued thereunder.

PARTIES BOUND

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

SEVERABILITY

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

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FURTHER ENFORCEMENT ACTION

Division 104, Part 12, Chapter 4, (commencing with Section 116270) of the California Health and Safety Code authorizes the Division of Drinking Water to: issue additional citations with assessment of penalties if the 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. The Division does not waive any further enforcement action by issuance of this citation.

April 25, 2017

Sheri Miller, P.E.
Mendocino District Engineer
Division of Drinking Water
State Water Resources Control Board

Date

Certified Mail No. _____

Appendices (3):

1. Public Notification Template
2. Compliance Certification Form
3. Applicable Statutes and Regulations
4. Bacteriological Sampling Plan Template

2310303/Compliance File #4
02_03_17C_013_2310303_19/LSH

IMPORTANT INFORMATION ABOUT YOUR DRINKING WATER

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

Hendy Woods State Park Failed to Complete Follow up Testing for Bacteria

Our water system collected a water sample in February 2017 which tested positive for bacteria. We failed to conduct follow up testing on the well water, as required by the California Code of Regulations. Although this is not an emergency, as our customers, you have a right to know what happened, what you should do, and what we did to correct the situation. Please share this information with other people who drink this water, especially those who may not have received this notice directly. You can do this by posting this notice in a public place or giving out copies by hand or mail.

What should I do?

You do not need to take any corrective actions at this time. This is not an emergency. If you have health concerns, you may wish to consult your doctor. General guidelines on regulated contaminants in drinking water are available from EPA's Safe Drinking Water Hotline at (800) 426-4791.

What happened?

We are required by state regulations to monitor our drinking water for specific contaminants on a regular basis. Results of this routine and follow up monitoring are an indicator of whether or not the drinking water meets health standards. During February 2017, a water sample tested positive for total coliform bacteria. We collected four repeat samples from the distribution that tested negative for bacteria. However, we did not complete the follow up testing for bacteria on the well water after we received the positive result.

What does this mean?

Coliforms are bacteria that are naturally present in the environment and are used as an indicator that other, potentially harmful, bacteria may be present. Coliform bacteria indicate the possibility of potential contamination and may originate from human, animal, or soil sources. *E. coli* bacteria can cause illness, especially in children and the elderly. If drinking water standards are not met, drinking the water may not necessarily result in illness, but that possibility exists. Routine and follow up sampling are important to periodically verify the safety of the water. Our failure to conduct all required follow up testing for bacteria during February 2017 was a violation of Section 64430, Title 22 of the California Code of Regulations (CCR).

What corrective actions have been taken by Hendy Woods State Park to prevent this violation from occurring in the future?

This notification of the public is being done in compliance with Sections 64463.4 and 64465, Title 22 of the CCR as a means of keeping the public informed.

Persons wishing more information should contact: _____

(name)

_____

(address)

_____

(phone number)

APPENDIX 2. COMPLIANCE CERTIFICATION

Citation Number : 02_03_17C_013

Name of Water System: **CSP-Hendy Woods**

System Number: **2310303**

As required by Section 116450 of the California Health and Safety Code, I certify that the users of the water supplied by this water system were notified of the violations of Title 22, California Code of Regulations. In addition, I certify that the CSP-Hendy Woods water system complied with the directives of this citation as indicated below:

Required Action	Date Completed
Complete Appendix 1, as required in Directive 2 of this citation	
Public Notification – Indicate methods below.	

☐ Posting in conspicuous locations for 7 days (attach copy of notice and give locations and dates of posting).

AND choose one of the following methods:

☐Publication in a local newspaper or newsletter (attach copy of newspaper publication or newsletter); OR

☐E-mail message to employees or students (attach copy of sent email); OR

☐Post notice on the Internet or intranet (provide website page and printout of notice).

Signature of Water System Representative

Date

THIS FORM MUST BE COMPLETED AND RETURNED WITH ATTACHMENTS TO THE DIVISION NO LATER THAN May 15, 2017

Disclosure: Be advised that Section 116725 and 116730 of the California Health and Safety Code states that any person who knowingly makes any false statement on any report or document submitted for the purpose of compliance with the attached order may be liable for a civil penalty not to exceed five thousand dollars ($5,000) for each separate violation for each day that violation continues. In addition, the violators may be prosecuted in criminal court and upon conviction, be punished by a fine of not more than $25,000 for each day of violation, or be imprisoned in county jail not to exceed one year, or by both the fine and imprisonment.

APPENDIX 3. APPLICABLE STATUTES AND REGULATIONS

FOR CITATION NO. 02_03_17C_013

Note: The Department referenced below, formerly the California Department of Public Health, Drinking Water Program, now refers to the State Water Resources Control Board, Division of Drinking Water. The Drinking Water Program moved to the State Water Resources Control Board on July 1, 2014.

Section 116650 of the CHSC states in relevant part:

(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.

California Code of Regulations, Section 64424 states, in relevant part:

(a) If a routine sample is total-coliform positive, the water supplier shall collect a repeat sample set as described in paragraph (a)(1) within 24 hours of being notified of the positive result. The repeat samples shall all be collected within the same 24 hour time period. A single service connection system may request that the Department allow the collection of the repeat sample set over a four-day period.

(1) For a water supplier that normally collects more than one routine sample a month, a repeat sample set shall be at least three samples for each total coliform-positive sample. For a water supplier that normally collects one or fewer samples per month, a repeat sample set shall be at least four samples for each total coliform-positive sample.

California Code of Regulations (CCR), Section 64423.1 states in relevant part:

(a) Analytical results of all required samples collected for a system in a calendar month shall be reported to the Department not later than the tenth day of the following month.

California Code of Regulations, Title 22, Section 64430 and Section 141.401(a)(1), Title 40, Code of Federal Regulations published in the November 8, 2006 Federal Register (Vol. 71, No. 216) states, in relevant part:

A ground water system must conduct triggered source water monitoring if the system is notified that a sample collected under California Code of Regulations,

Title 22, Sections 64422 and 64423 is total coliform-positive and the sample is not invalidated under California Code of Regulations, Title 22, Section 64425.

California Code of Regulations Section 64463.4 states, in relevant part:

(a) A water system shall give public notice pursuant to this section if any of the following occurs:

(2) All violations of the monitoring and testing procedure requirements in sections 64421 through 64426.1, article 3 (Primary Standards – Bacteriological Quality), for which the Department determines that a Tier 2 rather than a Tier 3 public notice is required, based on potential health impacts and persistence of the violations;

(3) Other violations of the monitoring and testing procedure requirements in this chapter, and chapters 15.5, 17 and 17.5, for which the Department determines that a Tier 2 rather than a Tier 3 public notice is required, based on potential health impacts and persistence of the violations.

(b) A water system shall give the notice as soon as possible within 30 days after it learns of a violation or occurrence specified in subsection (a), except that the water system may request an extension of up to 60 days for providing the notice. This extension would be subject to the Department's written approval based on the violation or occurrence having been resolved and the Department's determination that public health and welfare would in no way be adversely affected. In addition, the water system shall:

(1) Maintain posted notices in place for as long as the violation or occurrence continues, but in no case less than seven days;

(2) Repeat the notice every three months as long as the violation or occurrence continues. Subject to the Department's written approval based on its

determination that public health would in no way be adversely affected, the water system may be allowed to notice less frequently but in no case less than once per year. No allowance for reduced frequency of notice shall be given in the case of a total coliform MCL violation or violation of a Chapter 17 treatment technique requirement.

(c) A water system shall deliver the notice, in a manner designed to reach persons served, within the required time period as follows:

(2) Unless otherwise directed by the Department in writing based on its assessment of the violation or occurrence and the potential for adverse effects on public health and welfare, <u>noncommunity water systems shall give the public notice by:</u>

(A) Posting in conspicuous locations throughout the area served by the water system; and

(B) Using one or more of the following methods to reach persons not likely to be reached by a public posting:

1. Publication in a local newspaper or newsletter distributed to customers;
2. E-mail message to employees or students;
3. Posting on the Internet or intranet; or
4. Direct delivery to each customer.

California Code of Regulations (CCR), Section 64465 states in relevant part:

(a) Each public notice given pursuant to this article, except Tier 3 public notices for variances and exemptions pursuant to subsection (b), shall contain the following:

(1) A description of the violation or occurrence, including the contaminant(s) of concern, and (as applicable) the contaminant level(s);

(2) The date(s) of the violation or occurrence;

(3) Any potential adverse health effects from the violation or occurrence, including the appropriate standard health effects language from appendices 64465-A through G;

(4) The population at risk, including subpopulations particularly vulnerable if exposed to the contaminant in drinking water;

(5) Whether alternative water supplies should be used;

(6) What actions consumers should take, including when they should seek medical help, if known;

(7) What the water system is doing to correct the violation or occurrence;

(8) When the water system expects to return to compliance or resolve the occurrence;

(9) The name, business address, and phone number of the water system owner, operator, or designee of the water system as a source of additional information concerning the public notice;

(10) A statement to encourage the public notice recipient to distribute the public notice to other persons served, using the following standard language: "Please share this information with all the other people who drink this water, especially those who may not have received this public 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"; and

(11) For a water system with a monitoring and testing procedure violation, this language shall be included: "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 your 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 your drinking water during that time."

(c) Each public notice given pursuant to this article shall contain information in Spanish regarding the importance of the notice, or 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. For each non-English speaking group other than Spanish-speaking that exceeds 1,000 residents or 10% of the residents in the community served, whichever is less, the public notice shall:

(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.

(d) Each public notice given pursuant to this article shall:

(1) Be displayed such that it catches people's attention when printed or posted and be formatted in such a way that the message in the public notice can be understood at the eighth-grade level;

(2) Not contain technical language beyond an eighth-grade level or print smaller than 12 point; and

(3) Not contain language that minimizes or contradicts the information being given in the public notice.

State Water Resources Control Board, Division of Drinking Water, Mendocino District

Bacteriological Sampling Plan – Ground Water System

(1 Routine Sample per Month or Less)

30GW

I. System Information

System Number: 2310303

System or Facility Name:	**CSP – Hendy Woods State Park**
Service connections:	
	(Number of residences and/or buildings served by the system)
Population:	
	(Number of individuals served each day by system during busiest month)
Source(s):	
	(List all water supply sources wells, springs, lakes, etc.)

II. Routine Sampling Frequency

The water system must collect 1 routine samples at a frequency of once every month.
(# of samples)

III. Routine, Repeat, and Source Sampling Sites (Do Not Disinfect Before Repeat Sampling)

Routine Distribution Sample Site No. 1: _____

System Source(s) Supplying Site No. 1: _____

If this routine sample (or any routine sample) contains coliform bacteria, the water system must collect a set of **four** repeat distribution samples **within 24 hours** of being notified of the result **as well as a sample from each source supplying the sample site**. **The source samples must be analyzed for *E. coli*.**

Repeat Sample Set No. 1:

Repeat sample site No. 1: _____
(Collect one sample at the original routine sample site)

Repeat sample site No. 2: _____
(Collect one sample within five connections upstream)

Repeat sample site No. 3: _____
(Collect one sample within five connections downstream)

Repeat sample site No. 4: _____
(Collect one additional sample within five connections upstream or downstream)

Source sample sites: _____
(Collect one sample from each source that was supplying the site when the positive sample was collected)

- **If a REPEAT bacteriological sample in the distribution system is *E. coli* positive, OR if a REPEAT sample is total coliform positive (*E. coli* negative) BUT it was for a routine sample that was *E. coli* positive, OR if the water system does not test for *E. coli* in the REPEAT sample, THEN the system MUST conduct Tier 1 public notification and immediately notify the Division.**
- **If the routine sample was total coliform positive (and *E. coli* positive or negative) AND the source sample is *E. coli* positive, THEN the system MUST conduct Tier 1 public**

notification, notify the Division, and collect five (5) additional SOURCE samples within 24 hours of being notified of sample result.

Complete this page only if your water system must designate more than one routine sample site.

* A routine sample site must be designated for each pressure zone or separate area served by the water system. The routine sample sites must be rotated such that they are all sampled on a regular basis. If this water system must designate more than one routine sample site, please do so on the following page. Copy and include as many pages as necessary to specify each routine sample site.

Check one of the following:

☐ Only one routine sample site is necessary to adequately represent the system. Additional routine and repeat sample sites *are not* attached.

☐ This water system contains more than one pressure zone or separate area. Additional routine and repeat sample sites *are* attached.

Routine Distribution Sample Site No.___: _____

System Source(s) Supplying Site No.___: _____

If this routine sample (or any routine sample) contains coliform bacteria, the water system must collect a set of **four** repeat distribution samples within 24 hours of being notified of the result **as well as a sample from each source supplying the sample site**. **The source samples must be analyzed for *E. coli*.**

Repeat Sample Set No.___:

Repeat sample site No. 1: _____
(Collect one sample at the original routine sample site)

Repeat sample site No. 2: _____
(Collect one sample within five connections upstream)

Repeat sample site No. 3: _____
(Collect one sample within five connections downstream)

Repeat sample site No. 4: _____
(Collect one additional sample within five connections upstream or downstream)

Source Sample Sites: _____
(Collect one sample from each source that was supplying the site when the positive sample was collected)

Routine Distribution Sample Site No.___: _____

System Source(s) Supplying Site No.___: _____

If this routine sample (or any routine sample) contains coliform bacteria, the water system must collect a set of **four** repeat distribution samples within 24 hours of being notified of the result **as well as a sample from each source supplying the sample site**. **The source samples must be analyzed for *E. coli*.**

Repeat Sample Set No.___:

Repeat sample site No. 1: _____
(Collect one sample at the original routine sample site)

Repeat sample site No. 2: _____
(Collect one sample within five connections upstream)

Repeat sample site No. 3: _____
(Collect one sample within five connections downstream)

Repeat sample site No. 4: _____

Water System Name: _____ Water System Number: _____

(Collect one additional sample within five connections upstream or downstream)

Source Sample Sites: _____

(Collect one sample from each source that was supplying the site when the positive sample was collected)

IV. Sampling During the Month Following a Positive Sample

If one or more samples are positive for total coliform in a month, the water system is required to collect **five routine samples during the following month**. These five samples can be collected over the course of the month from the same site, all on the same day from five different sites or any combination thereof. Please list the locations from which these extra samples would be collected:

1. _____ 2. _____ 3. _____

4. _____ 5. _____

If one of these five routine samples is positive for total coliform, four repeat samples must be collected.

V. Raw Water Monitoring, if Required by the Division

During normal operations, each source shall be sampled at the frequency in the table below. All raw water samples shall be collected prior to any treatment.

Source Name	Activity Status	Frequency	Number of Samples

All raw water bacteriological monitoring shall be analyzed for both total coliform and *E. coli* bacteria using an approved method that enumerates bacteria density up to 2,400 organisms per 100 milliliters of sample and shall be submitted to the Division of Drinking Water, Mendocino District by the 10th day of the month following the monitoring period.

VI. Map or Diagram

Attach a map or diagram showing the location of the well(s), all pressure zones, all routine and repeat sample sites, and the entry point(s) of water into the distribution system.

VII. Personnel and Laboratory Notification

Sampler(s): _____

Sample collection must be performed by a person trained in sample collection. Provide name of sampler(s).

Laboratory: _____

Provide the name and phone number of the certified lab doing your water analysis. Arrangement must be made for weekend and holiday analysis if needed.

Notification: Laboratory to notify persons designated below within 24 hours whenever a sample is found to contain coliform bacteria:

1. _____

(Name) (Daytime Phone #) (Evening Phone #)

2. _____

(Name) (Daytime Phone #) (Evening Phone #)

Water System Name: _____ Water System Number: _____

VIII. Notification of the Division:

The water system will notify the State Water Resources Control Board, Division of Drinking Water, Mendocino District, within 24 hours whenever a sample contains *E. coli* bacteria or whenever a follow-up distribution sample for an *E. coli* positive is positive for total coliform bacteria.

Mendocino District Office:	707-576-2145	(day or night, leave message)
Sheri Miller, District Engineer:	707-576-2734	(evening: 707-974-8004)

IX. Need for Additional Monitoring:

According to section 64421(b) of the California Code of Regulations (CCR), the water system shall perform additional bacteriological monitoring as follows:

(1) After construction or repair of wells

(2) After main installation or repair

(3) After construction, repair, or maintenance of storage facilities

(4) After any system pressure loss to less than five psi. Samples collected shall represent the water quality in the affected portions of the system.

According to section 64583 of the CCR, the water system shall also perform bacteriological monitoring of a well that has not been in operation for more than three months prior to use.

Submitted by: _____ Date _____

KEEP A COPY OF THIS FORM FOR YOUR REFERENCE AND USE

When responding to a laboratory report of bacterial contamination, keep in mind the following:

- Coliform bacteria should not be present in drinking water and the presence of coliform bacteria indicates a potentially serious problem. Appropriate investigation should be performed immediately.
- Check water system components such as water sources, filtration and/or chlorination equipment and storage tanks for indications of unusual conditions or problems.
- Correct problems immediately, do not wait for results of follow-up samples to take action.
- **If the REPEAT bacteriological sample in the distribution system is *E. coli* positive, OR if REPEAT sample is total coliform positive but it was for a routine sample that was *E. coli* positive, OR if the water system does not test for *E. coli* in the REPEAT sample, THEN the system MUST conduct Tier 1 public notification and immediately notify the Division.**
- **If the routine sample was total coliform positive AND the source sample is *E. coli* positive, THEN the system MUST conduct Tier 1 public notification, notify the Division, and collect five (5) additional source samples within 24 hours of being notified of sample result.**