October 24, 2018

Andrew Pust
49191 Cherokee Road
Newberry Springs, CA 92365

Dear Mr. Pust,

COMPLIANCE ORDER AMENDMENT NO. 05_66_18R_070_3601015_02_A1
IRONWOOD CAMP (SYSTEM NO. 3601015)
ARSENIC AND FLUORIDE MAXIMUM CONTAMINANT LEVEL VIOLATION

Enclosed is Compliance Order Amendment No. 05_66_18R_070_3601015_02_A1 issued to the Ironwood Camp public water system (hereinafter “Water System”). This Compliance Order Amendment revises certain directive(s) of Compliance Order No. 05_66_17R_007_3601015_02 issued to the Water System on March 22, 2017, for non-compliance with the arsenic and fluoride maximum contaminant level (MCL). Specifically, this amendment grants the Water System’s request and revises the deadline for compliance with the arsenic and fluoride MCL. The revised centralized treatment system construction completion and compliance with the arsenic and fluoride MCL deadline is July 31, 2019.

Any future enforcement actions taken by the Division of Environmental Health Service (Division) regarding this citation will be billed at the Division’s current hourly rate of $244.80. California Health and Safety Code (CHSC), 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. Future enforcement actions may include any time spent by the Division due to the Water System’s failure to meet any directives as stated on Compliance Order Amendment No. 05_66_18R_070_3601015_02_A1.

Any person or entity who is aggrieved by a citation, order or decision issued by the Division under Article 8 (commencing with CHSC, Section 116625) or Article 9 (commencing with CHSC, Section 116650), of the Safe Drinking Water Act (Chapter 4, Part 12, Division 104, of the CHSC) may file a petition with the State Water Board for reconsideration of
the citation, order or decision. Appendix 1 to the enclosed citation contains the relevant statutory provisions for filing a petition for reconsideration (CHSC, Section 116701).

Petitions must be received by the State Board within 30 days of the issuance of the citation, order or decision by the Division. The date of issuance is the date when the Division mails a copy of the citation, order or decision. If the 30th day falls on a Saturday, Sunday, or state holiday, the petition is due the following business day. Petitions must be received by 5:00 p.m. Information regarding filing petitions may be found at:

http://www.waterboards.ca.gov/drinking_water/programs/petitions/index.shtml

If you have any questions regarding this letter, please contact Belinda Huy at (800) 442-2283.

Sincerely,

Belinda Huy, REHS
Land Use Protection Program
San Bernardino County
Division of Environmental Health Services

Certified Mail:

cc: Eric J. Zúñiga, PE, District Engineer, Division of Drinking Water by email at eric.zuniga@waterboards.ca.gov
San Bernardino County
Department of Public Health
DIVISION OF ENVIRONMENTAL HEALTH SERVICES

IN RE: Ironwood Camp
49191 Cherokee Road
Newberry Springs, CA 92365

ATTN: Andrew Pust
49191 Cherokee Road
Newberry Springs, CA 92365

COMPLIANCE ORDER AMENDMENT NO. 05_66_18R_070_3601015_02_A1
FIRST AMENDMENT TO CITATION NO. 05_66_17R_007_3601015_02
FOR VIOLATION OF HEALTH AND SAFETY CODE SECTION 116555(a)(1)
AND THE PRIMARY DRINKING WATER STANDARD FOR THE INORGANIC CHEMICALS, ARSENIC AND FLUORIDE
TITLE 22, CALIFORNIA CODE OF REGULATIONS, SECTION 64431

Issued October 24, 2018

The Division of Environmental Health Services (hereinafter "Division"), hereby issues this compliance order amendment (hereinafter "Order") pursuant to Section 116555 of the California Health and Safety Code (hereinafter "CHSC") to the Ironwood Camp (hereinafter "Water System") public water system and its owner of record for violation of CHSC section 116555(a)(1) and Title 22, California Code of Regulations (hereinafter "CCR"), Section 64431.

Citation No. 05_66_17R_007_3601015_02, provided as Attachment 6, was issued to the Water System on March 22, 2017, for violation of the arsenic and fluoride maximum contaminant level.

The Division hereby further amends the Compliance Order as follows:

A. Delete Directive 1 and replace with the following:

“By July 31, 2019, the Water System shall complete construction of the proposed centralized treatment system. The Water System shall be operational immediately after construction and remain in compliance with Title 22, CCR, Section 64431.”

Except as amended herein, all other directives of Compliance Order No. 05_66_18R_007_3601015_02 shall remain in full force and effect.

APPLICABLE AUTHORITIES
The applicable statutes and regulations are provided in Attachment A, attached hereto and incorporated by reference.
STATEMENT OF FACTS
The Water System is a Public Water System located in San Bernardino County that supplies water to an organized camp with 60 cabins, the Homestead (dining area), an ice machine/water fill station, two coffee shops, restrooms, and drinking fountains in the school and breakroom; serving 38 employees, family members, and a transient population of approximately 109 persons during the busiest month of the year. The Water System is permitted as a community water system as defined in CHSC, Section 116275(i). The Water System utilizes two groundwater wells, Well 2 (Main Camp Well) and Well 3 (Agricultural Well), as its sources of supply. Title 22, CCR, Division 4, Chapter 15, Article 4, establishes primary drinking water standards and monitoring and reporting requirements for inorganic chemicals, including arsenic and fluoride. All public water systems must comply with the primary maximum contaminant levels (MCL) for arsenic of 10 micrograms per liter (µg/L) and for fluoride of 2.0 milligrams per liter (mg/L).

The current running annual average (RAA) for arsenic from Well 2 on 10/04/2018 was established at an average concentration of 41.5 µg/L shown in Table 1; and 4.93 mg/L for fluoride as shown in Table 2. The current RAA for arsenic from Well 3 on 10/04/2018 was established at an average concentration of 35.25 µg/L shown in Table 3; and 4.18 mg/L for fluoride as shown in Table 4.

The current RAAs for the active groundwater sources, Well 2 and Well 3, exceed the arsenic and fluoride MCL. Therefore, the Division has determined that the Water System has violated the arsenic and fluoride MCL.

Table 1: Arsenic Analysis Results and RAA for Well 2

<table>
<thead>
<tr>
<th>Well 2 Arsenic</th>
<th>01/04/2018</th>
<th>04/05/2018</th>
<th>08/23/2018</th>
<th>10/04/2018</th>
<th>RAA</th>
</tr>
</thead>
<tbody>
<tr>
<td>PS Code 3601015-002</td>
<td>28 µg/L</td>
<td>41 µg/L</td>
<td>49 µg/L</td>
<td>48 µg/L</td>
<td>41.5 µg/L</td>
</tr>
</tbody>
</table>

Table 2: Fluoride Analysis Results and RAA for Well 2

<table>
<thead>
<tr>
<th>Well 2 Fluoride</th>
<th>01/04/2018</th>
<th>04/05/2018</th>
<th>08/23/2018</th>
<th>10/04/2018</th>
<th>RAA</th>
</tr>
</thead>
<tbody>
<tr>
<td>PS Code 3601015-002</td>
<td>5.0 mg/L</td>
<td>4.8 mg/L</td>
<td>4.9 mg/L</td>
<td>5.0 mg/L</td>
<td>4.93 mg/L</td>
</tr>
</tbody>
</table>

Table 3: Arsenic Analysis Results and RAA for Well 3

<table>
<thead>
<tr>
<th>Well 3 Arsenic</th>
<th>05/19/2004</th>
<th>04/05/2018</th>
<th>08/23/2018</th>
<th>10/04/2018</th>
<th>RAA</th>
</tr>
</thead>
<tbody>
<tr>
<td>PS Code 3601015-003</td>
<td>37 µg/L</td>
<td>36 µg/L</td>
<td>38 µg/L</td>
<td>30 µg/L</td>
<td>35.25 µg/L</td>
</tr>
</tbody>
</table>

Table 4: Fluoride Analysis Results and RAA for Well 3
The Water System currently maintains a Reverse Osmosis (RO) treatment system, which effectively removes or reduces arsenic and fluoride levels to drinking water standards. The treated water supplies the coffee shop, dining hall, and drinking fountains located on the K through 12 school campus. However, the RO system is not a centralized treatment unit for the entire distribution system. Thus, there continues to be areas within the camp receiving water in excess of the arsenic and fluoride MCL.

The following is a timeline that represents prior attempts by the Division in efforts to return the Water System into compliance with the CHSC and CCR.

**March 22, 2017**
Compliance Order No. 05_66_17R_007_3601015_02 was issued to the Water System.

**June 27, 2018**
An Extension Request Letter was submitted by Andrew Pust to request a deadline extension for the Compliance Order No. 05_66_17R_007_3601015_02. The deadline extension request was granted by the Division and the Water System shall return to compliance no later than 07/31/2019.

**August 30, 2018**
The Water System’s Technical Plan was approved pending all direct and indirect additives to the drinking water supply meet the specifications of the National Sanitation Foundation/American National Science Institute (NSF/ANSI) 60 and 61.

**DETERMINATIONS**
Based on the above Statement of Facts, the Division has determined that the Water System and its owner of record have violated CHSC, Section 116555 and Title 22, CCR, Section 64431 in that the inorganic chemicals, arsenic and fluoride, exceed the MCL. Furthermore, the Water System has been granted an extension for Compliance Order No. 05_66_17R_007_3601015_02 to return to compliance no later than 07/31/2019.

**DIRECTIVES**
The Water System and its owner of record are hereby directed to take the following actions:

1. **By July 31, 2019**, the Water System shall complete construction of the proposed centralized treatment system. The Water System shall be operational immediately after construction and remain in compliance with Title 22, CCR, Section 64431.

2. On or before **November 9, 2018**, submit a Notification of Receipt included in Attachment 2 to the Division indicating its agreement to comply with the directives of this Order addressed herein.
3. Commencing on the date of service of this Order, for each quarter that the Water System is in violation, continue to collect quarterly arsenic and fluoride samples from the active groundwater sources, Well 2 and Well 3. The Water System shall collect arsenic and fluoride samples in accordance with Title 22, CCR, Section 64431(g), in all future monitoring periods, which is quarterly at a minimum.

4. Commencing on the date of service of this Order, for each quarter that the Water System is in violation, continue to notify all persons served by the Water System of the violation of Section 64431 in conformance with Title 22, CCR, Section 64465. Copies of Section 64435 are included in Attachment 1. Attachment 3: Notification Template shall be used to fulfill this directive, unless otherwise approved by the Division.

The System shall deliver the notice in a manner designed to reach persons served within the required time period as follows: (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 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.

The quarterly public notification must include the most recent quarterly arsenic and fluoride results.

5. Commencing on the date of service of this Order, for each quarter that the Water System is in violation, continue to complete Attachment 4: Compliance Certification Form. Submit it together with a copy of the public notification required by Directive 4 to the Division.

6. Commencing on the date of service of this Order, for each quarter that the Water System is in violation, submit a report to the Division in the form provided as Attachment 5: Quarterly Progress Report, hereto, showing actions taken during the previous calendar three months to comply with the Corrective Action Plan.

7. Notify the Division in writing no later than five (5) days prior to the deadline for performance of any Directive set forth herein if the Water System anticipates that it will not meet the performance deadline on a timely basis.

All submittals required by this Order shall be electronically submitted to the Division at the following address. The subject line for all electronic submittals corresponding to this Order shall include the following information: Ironwood Camp, 3601015, 05-66-18R-070 and the title of the document being submitted.

Belinda Huy, REHS
Registered Environmental Health Specialist
Belinda.Huy@dph.sbcounty.gov
Submittals may also be submitted to the Division at the following mailing address.

Division of Environmental Health Services  
Attn: Belinda Huy, REHS  
385 N. Arrowhead Ave., 2nd Floor  
San Bernardino, CA 92415

As used in this Order, the Date of Issuance shall be the date of this Order; and the Date of Service shall be the date of service of this Order, personal or by certified mail, on the Water System.

The Division reserves the right to make such modifications to this Order and/or to issue such further order(s) as it may deem necessary to protect public health and safety. Such modifications may be issued as amendments to this Order and shall be deemed effective upon issuance.

Nothing in this Order relieves Water System or its owner of record of its obligation to meet the requirements of the California SDWA, or any regulation, standard, permit or order issued thereunder.

PARTIES BOUND
This Order shall apply to and be binding upon the Water System, its owners, shareholders, officers, directors, agents, employees, contractors, successors, and assignees.

SEVERABILITY
The Directives of this Order are severable, and Water System and its owner of record shall comply with each and every provision hereof, notwithstanding the effectiveness of any other provision.

FURTHER ENFORCEMENT ACTION
The California SDWA authorizes the Division to issue a citation with assessment of administrative penalties to a public water system for violation or continued violation of the requirements of the California SDWA or any regulation, permit, standard, citation, or order issued or adopted thereunder including, but not limited to, failure to correct a violation identified in a citation or compliance order. The California SDWA also authorizes the Division to take action to suspend or revoke a permit that has been issued to a public water system if the public water system has violated applicable law or regulations or has failed to comply with an order of the Division. The Division does not waive any further enforcement action by issuance of this Order.
Belinda Huy, REHS
Division of Environmental Health Services
San Bernardino County

Attachments:
Attachment 1: Applicable Authorities
Attachment 2: Notification of Receipt
Attachment 3: Tier 2 Public Notification Instructions and Template
Attachment 4: Compliance Certification Form
Attachment 5: Quarterly Progress Report
ATTACHMENT 1. APPLICABLE STATUTES AND REGULATIONS FOR VIOLATIONS OF ARSENIC AND FLUORIDE MAXIMUM CONTAMINANT LEVEL

California Health and Safety Code (CHSC):

Section 116271 states in relevant part:
(a) The State Water Resources Control Board succeeds to and is vested with all of the authority, duties, powers, purposes, functions, responsibilities, and jurisdiction of the State Department of Public Health, its predecessors, and its director for purposes of all of the following:

(1) The Environmental Laboratory Accreditation Act (Article 3 (commencing with Section 100825) of Chapter 4 of Part 1 of Division 101).
(2) Article 3 (commencing with Section 106875) of Chapter 4 of Part 1.
(3) Article 1 (commencing with Section 115825) of Chapter 5 of Part 10.
(4) This chapter and the Safe Drinking Water State Revolving Fund Law of 1997 (Chapter 4.5 (commencing with Section 116760)).
(5) Article 2 (commencing with Section 116800), Article 3 (commencing with Section 116825), and Article 4 (commencing with Section 116875) of Chapter 5.
(6) Chapter 7 (commencing with Section 116975).
(7) The Safe Drinking Water, Water Quality and Supply, Flood Control, River and Coastal Protection Bond Act of 2006 (Division 43 (commencing with Section 75001) of the Public Resources Code).
(8) The Water Recycling Law (Chapter 7 (commencing with Section 13500) of Division 7 of the Water Code).
(9) Chapter 7.3 (commencing with Section 13560) of Division 7 of the Water Code.
(10) The California Safe Drinking Water Bond Law of 1976 (Chapter 10.5 (commencing with Section 13850) of Division 7 of the Water Code).
(11) Wholesale Regional Water System Security and Reliability Act (Division 20.5 (commencing with Section 73500) of the Water Code).
(12) Water Security, Clean Drinking Water, Coastal and Beach Protection Act of 2002 (Division 26.5 (commencing with Section 79500) of the Water Code).
(b) The State Water Resources Control Board shall maintain a drinking water program and carry out the duties, responsibilities, and functions described in this section. Statutory reference to "department," "state department," or "director" regarding a function transferred to the State Water Resources Control Board shall refer to the State Water Resources Control Board. This section does not impair the authority of a local health officer to enforce this chapter or a county's election not to enforce this chapter, as provided in Section 116500...

(1) The State Water Resources Control Board shall appoint a deputy director who reports to the executive director to oversee the issuance and enforcement of public water system permits and other duties as appropriate. The deputy director shall have public health expertise.
(2) The deputy director is delegated the State Water Resources Control Board's authority to provide notice, approve notice content, approve emergency notification plans, and take other action pursuant to Article 5 (commencing with Section 116450), to issue, renew, reissue, revise, amend, or deny any public water system permits pursuant to Article 7 (commencing with Section 116525), to suspend or revoke any public water system permit pursuant to Article 8 (commencing with Section 116625), and to issue citations, assess penalties, or issue orders pursuant to Article 9 (commencing with Section 116650). Decisions and actions of the deputy director taken pursuant to Article 5 (commencing with Section 116450) or Article 7 (commencing with Section 116525) are deemed decisions and actions taken, but are not subject to reconsideration, by the State Water Resources Control Board. Decisions and actions of the deputy director taken pursuant to Article 8 (commencing with Section 116625) and Article 9 (commencing with Section 116650) are deemed decisions and actions taken by the State Water Resources Control Board, but any aggrieved person may petition the State Water Resources Control Board for reconsideration of the decision or action. This subdivision is not a limitation on the State Water Resources Control Board's authority to delegate any other powers and duties.

Section 116555 states in relevant part:
(a) Any person who owns a public water system shall ensure that the system does all of the following:
(1) Complies with primary and secondary drinking water standards.
(2) Will not be subject to backflow under normal operating conditions.
(3) Provides a reliable and adequate supply of pure, wholesome, healthful, and potable water.

Section 116650 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.

Title 22, California Code of Regulations (CCR):

Section 64431 (Maximum Contaminant Levels – Inorganic Chemicals), states in relevant part:
Public water systems shall comply with the primary MCLs in table 64431-A as specified in this article.

<table>
<thead>
<tr>
<th>Chemical</th>
<th>Maximum Contaminant Level</th>
</tr>
</thead>
<tbody>
<tr>
<td>Arsenic</td>
<td>10 µg/L</td>
</tr>
<tr>
<td>Fluoride</td>
<td>2.0 mg/L</td>
</tr>
</tbody>
</table>

Section 64432 (Primary Standards – Inorganic Chemicals), states in relevant part:
(g) If the level of any inorganic chemical, except for nitrate, nitrite, nitrate plus nitrite, or perchlorate, exceeds the MCL, the water supplier shall do one of the following:
1. Inform the State Board within 48 hours and monitor quarterly beginning in the next quarter after the exceedance occurred.

Appendix 64465-D. Health Effects Language

<table>
<thead>
<tr>
<th>Inorganic Contaminants</th>
<th>Health Effects Language</th>
</tr>
</thead>
<tbody>
<tr>
<td>Arsenic</td>
<td>Some people who drink water containing arsenic in excess of the MCL over many years may experience skin damage or circulatory system problems, and may have an increased risk of getting cancer.</td>
</tr>
<tr>
<td>Fluoride</td>
<td>This is an alert about your drinking water and a cosmetic dental problem that might affect children under nine years of age. At low levels, fluoride can help prevent cavities, but children drinking water containing more than 2 milligrams per liter (mg/L) of fluoride may develop cosmetic discoloration of their permanent teeth (dental fluorosis). The drinking water provided by your community water system [name] has a fluoride concentration of [insert value] mg/L. Dental fluorosis may result in a brown staining and/or pitting of the permanent teeth. This problem occurs only in developing teeth, before they erupt from the gums. Children under nine should be provided with alternative sources of drinking water or water that has been treated to remove the fluoride to avoid the possibility of staining and pitting of their permanent teeth. You may also want to contact your dentist about proper use by young children of fluoride containing products. Older children and adults may safely drink the water. Drinking water containing more than 4 mg/L of fluoride can increase your risk of developing bone disease. For more information, please call County Special District at 909-387-5940. Some home water treatment units are also available to remove fluoride from drinking water. To learn more about available home water treatment units, you may call the State Board’s Residential Water Treatment Device Registration Unit at (916) 449-5600.</td>
</tr>
</tbody>
</table>

Section 64463.4 (Tier 2 Public Notice), states in relevant part:
(a) A water system shall give public notice pursuant to this section if any of the following occurs:
1. Any violation of the MCL, MRDL, and treatment technique requirements, except:
   (A) Where a Tier 1 public notice is required under section 64463.1; or
   (B) Where the State Board determines that a Tier 1 public notice is required, based on potential health impacts and persistence of the violations;
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 State Board 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 State Board determines that a Tier 2 rather than a Tier 3 public notice is required, based on potential health impacts and persistence of the violations; or
4. Failure to comply with the terms and conditions of any variance or exemption in place.
(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 State Board’s written approval based on the violation or occurrence having been resolved and the State Board’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 State Board’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;
(3) For turbidity violations pursuant to sections 64652.5(c)(2) and 64653(c), (d) and (f), as applicable, a water system shall consult with the State Board as soon as possible within 24 hours after the water system learns of the violation to determine whether a Tier 1 public notice is required. If consultation does not take place within 24 hours, the water system shall give Tier 1 public notice within 48 hours after learning of the violation.

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

(1) Unless otherwise directed by the State Board in writing based on its assessment of the violation or occurrence and the potential for adverse effects on public health and welfare, community water systems shall give public notice by:

(A) Mail or direct delivery 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; and

(B) Use of 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.

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

(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.

Section 64465 (Public Notice Content and Format), 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) A public water system providing notice pursuant to this article shall comply with the following multilingual-related requirements:

(2) For a Tier 2 or Tier 3 public notice:

(A) The notice 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 public water system to obtain a translated copy of the notice or assistance in Spanish; and

(B) When a non-English speaking group other than Spanish-speaking exceeds 1,000 residents or 10 percent of the residents served by the public water system, the notice shall include:

1. Information in the appropriate language(s) regarding the importance of the notice; or
2. A telephone number or address where such residents may contact the public water system to obtain a translated copy of the notice or assistance in the appropriate language; and

(3) For a public water system subject to the Dymally-Alatorre Bilingual Services Act, Chapter 17.5, Division 7, of the Government Code (commencing with section 7290), meeting the requirements of this Article may not ensure compliance with the Dymally-Alatorre Bilingual Services Act.

(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.
Section 64469 (Reporting Requirements) states in relevant part:
(d) Within 10 days of giving initial or repeat public notice pursuant to Article 18 of this Chapter, except for notice given under section 64463.7(d), each water system shall submit a certification to the State Board that it has done so, along with a representative copy of each type of public notice given.

Section 64481 (Content of the Consumer Confidence Report) states in relevant part:
(g) For the year covered by the report, the Consumer Confidence Report shall note any violations of paragraphs (1) through (7) and give related information, including any potential adverse health effects, and the steps the system has taken to correct the violation.
   (1) Monitoring and reporting of compliance data.

Section 64482 (Required Additional Health Information), states in relevant part:
(a) A system that detects arsenic at levels above 0.005 mg/L, but below or equal to the MCL, shall include the following in its Consumer Confidence Report: "While your drinking water meets the federal and state standard for arsenic, it does contain low levels of arsenic. The arsenic standard balances the current understanding of arsenic's possible health effects against the costs of removing arsenic from drinking water. The U.S. Environmental Protection Agency continues to research the health effects of low levels of arsenic, which is a mineral known to cause cancer in humans at high concentrations and is linked to other health effects such as skin damage and circulatory problems."
ATTACHMENT 2. NOTIFICATION OF RECEIPT

Compliance Order Amendment Number: 05_66_18R_070_3601015_02_A1

Name of Water System: Ironwood Camp
System Number: 3601015

Certification

I certify that I am an authorized representative of the Ironwood camp public water system and that Compliance Order Amendment No. 05_66_18R_070_3601015_02_A1 was received on ______________________. Further, I certify that the Compliance Order Amendment has been reviewed by the appropriate management staff of the Ironwood Camp and it is clearly understood that Compliance Order Amendment No. 05_66_18R_070_3601015_02_A1 contains legally enforceable directives with specific due dates.

____________________________________
Print Name of Water System Representative

____________________________________
Signature of Water System Representative Date

THIS FORM MUST BE COMPLETED AND RETURNED TO THE DIVISION OF ENVIRONMENTAL HEALTH, NO LATER THAN November 9, 2018.

Disclosure: Be advised that the California Health and Safety Code, Sections 116725 and 116730 state that any person who knowingly makes any false statement on any report or document submitted for the purpose of compliance with the Safe Drinking Water Act may be liable for, respectively, a civil penalty not to exceed five thousand dollars ($5,000) for each separate violation or, for continuing violations, for each day that violation continues, or be punished by a fine of not more than $25,000 for each day of violation, or by imprisonment in the county jail not to exceed one year, or by both the fine and imprisonment.
ATTACHMENT 3. TIER 2 PUBLIC NOTIFICATION INSTRUCTIONS AND TEMPLATES

Instructions for Tier 2 Arsenic MCL Notice Template

Template Attached

Since exceeding the arsenic maximum contaminant level (MCL) is a Tier 2 violation, you must provide public notice to persons served as soon as practical but within 30 days after you learn of the violation [California Code of Regulations Title 22, Chapter 15, Section 64463.4(b)]. 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.

<table>
<thead>
<tr>
<th>If You Are a…</th>
<th>You Must Notify Consumers by…</th>
<th>…and By One or More of the Following Methods to Reach Persons Not Likely to be Reached by the Previous Method…</th>
</tr>
</thead>
<tbody>
<tr>
<td>Community Water System [64463.4(c)(1)]</td>
<td>Mail or direct delivery (a)</td>
<td>Publication in a local newspaper</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Posting in conspicuous public places served by the water system or on the Internet (b)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Delivery to community organizations</td>
</tr>
<tr>
<td>Non-Community Water System [64463.4(c)(2)]</td>
<td>Posting in conspicuous locations throughout the area served by the water system (b)</td>
<td>Publication in a local newspaper or newsletter distributed to customers</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Email message to employees or students</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Posting on the Internet or intranet (b)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Direct delivery to each customer</td>
</tr>
</tbody>
</table>

(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. 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 health effects and notification language in italics unchanged. This language is mandatory [64465].

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 Action**

In your notice, describe corrective actions you are taking. Do not use overly technical terminology when describing treatment methods. Listed below are some steps commonly taken by water systems with chemical or radiological violations. Use one or more of the following actions, if appropriate, or develop your own:

- “We are working with [local/state agency] to evaluate the water supply and researching options to correct the problem. These options may include treating the water to remove arsenic or connecting to [system]’s water supply.”
- “We have stopped using the contaminated well. We have increased pumping from other wells, and we are investigating drilling a new well.”
- “We will increase the frequency at which we test the water for arsenic.”
- “We have since taken samples at this location and had them tested. They show that we meet the standards.”

**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.
Our water system recently violated a drinking water standard. Although this is not an emergency, as our customers, you have a right to know what you should do, what happened, and what we are doing to correct this situation.

We routinely monitor for the presence of drinking water contaminants. Water sample results received on [date] showed arsenic levels of [level and units]. This is above the standard, or maximum contaminant level (MCL), of 0.010 milligrams per liter.

What should I do?

- You do not need to use an alternative water supply (e.g., bottled water).
- This is not an emergency. If it had been, you would have been notified immediately. However, some people who drink water containing arsenic in excess of the MCL over many years may experience skin damage or circulatory system problems, and may have an increased risk to getting cancer.
- If you have other health issues concerning the consumption of this water, you may wish to consult your doctor.

What happened? What is being done?

[Describe corrective action]. We anticipate resolving the problem within [estimated time frame].

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.
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: ___________.

Instructions for Tier 2 Fluoride MCL Notice Template
(This template is intended for sources in which fluoride occurs naturally)

Template Attached

Since exceeding the fluoride maximum contaminant level (MCL) is a Tier 2 violation, you must provide public notice to persons served as soon as practical but within 30 days after you learn of the violation [California Code of Regulations, Title 22, Chapter 15, Section 64463.4(b)]. 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.

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(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. 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 health effects and notification language in italics unchanged. This language is mandatory [64465].

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.

Alternative Sources of Water

If you are providing alternative sources of water, your notice should say where to obtain it. Remember that bottled water can also be high in fluoride if the bottler uses water from your system. Make sure the bottled water meets standards by contacting the bottler and asking for the most recent test results.

Corrective Action

In your notice, describe corrective actions you are taking. Do not use overly technical terminology when describing treatment methods. Listed below are some steps commonly taken by water systems with fluoride violations. Use one or more of the following actions, if appropriate, or develop your own:

- “We are working with [local/state agency] to evaluate the water supply and researching options to correct the problem. These options may include treating the water to remove fluoride or connecting to [system]’s water supply.”
- “We have stopped using the contaminated well. We have increased pumping from other wells, and we are investigating drilling a new well.”
- “We will increase the frequency at which we test the water for fluoride.”
- “We have since taken samples at this location and had them tested. They show that we meet the standards.”

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 or dentists with questions about how the violation may affect their health, and the doctors or dentists 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.

[System] Has Levels of Fluoride Above the Drinking Water Standard

Our water system recently violated a drinking water standard. Although this is not an emergency, as our customers, you have a right to know what you should do, what happened, and what we are doing to correct this situation.

We routinely monitor for the presence of drinking water contaminants. Water sample results received on [date] showed that the drinking water provided by your community water system [name] has a fluoride concentration of [insert value] mg/L. This is above the standard, or maximum contaminant level (MCL), of 2.0 mg/L.

What should I do?

- **Children under the age of nine should use an alternative source of water that is low in fluoride.** You may also want to contact your dentist about proper use by young children of fluoride-containing products.

- This is not an emergency. If it had been, you would have been notified immediately. Rather, this is an alert about your drinking water and a cosmetic dental problem that might affect children under nine years of age. At low levels, fluoride can help prevent cavities, but children drinking water containing more than 2 milligrams per liter (mg/L) of fluoride may develop cosmetic discoloration of their permanent teeth (dental fluorosis).

- **Dental fluorosis may result in a brown staining and/or pitting of the permanent teeth.** This problem occurs only in developing teeth, before they erupt from the gums. Children under nine should be provided with alternative sources of drinking water or water that has been treated to remove the fluoride to avoid the possibility of staining and pitting of their permanent teeth. You may also want to contact your dentist about proper use by young children of fluoride-containing products. Older children and adults may safely drink the water.

- **Drinking water containing more than 4 mg/L of fluoride can increase your risk of developing bone disease.** Although bone disease may develop in anyone exposed to years of drinking water containing more than 4 mg/L of fluoride, dental fluorosis can occur after a relatively short period of exposure (i.e., months) in children under the age of nine.
For other health issues concerning the consumption of this water, you may wish to consult your doctor.

- Some home water treatment units are also available to remove fluoride from drinking water. To learn more about available home water treatment units, you may call the State Water Resources Control Board, Residential Water Treatment Device Registration Unit at (916) 449-5600 or visit the State Board’s website at http://www.swrcb.ca.gov/.

**What happened? What is being done?**

Fluoride contamination is rarely due to human activity. Fluoride occurs naturally in some areas and is found in high concentrations in our source water.

[Describe corrective action]. We anticipate resolving the problem within [estimated time frame].

*For more information, please call [water system contact name] of [water system name] at [phone number].*

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: ____________.
ATTACHMENT 4. COMPLIANCE CERTIFICATION

Public 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 Ironwood Camp Water System.

Public Water System number: 3601015. Date distributed: ____________.

This form, when completed and returned to San Bernardino County, Division of Environmental Health Services (385 North Arrowhead Ave, 2nd Floor, San Bernardino, CA 92415 or fax to 909-387-4323, serves as certification that public notification to water users was completed as required by Title 22, California Code of Regulations, Sections 64463-64465.

☐ The notice was mailed to users on:______________________________
A copy of the notice is attached.

☐ The notice was hand delivered to water customers on:______________________________
A copy of the notice is attached.

☐ The notice was published in the local newspaper on:______________________________
A copy of the newspaper notice is attached.

☐ The notice was published in conspicuous places on:______________________________
A copy of the notice is attached.
A list of locations the notice was posted is attached.

☐ The notice was delivered to community organizations on:______________________________
A copy of the notice is attached.
A list of community organizations the notice was delivered to is attached.

I hereby certify that the above information is factual.

Printed Name

Title

Signature

Date

Disclosure: Be advised that Section 116725 and 116730 of the California Health and Safety Code state 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 separate violation each day that the 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 the county jail not to exceed one year, or by both the fine and imprisonment.
ATTACHMENT 5. QUARTERLY PROGRESS REPORT

<table>
<thead>
<tr>
<th>Water System: Ironwood Camp</th>
<th>Water System No.: 3601015</th>
</tr>
</thead>
<tbody>
<tr>
<td>Compliance Order Amendment No.: 05_66_18R_070_3601015_02_A1</td>
<td>Violation: Arsenic and Fluoride MCL</td>
</tr>
<tr>
<td>Calendar Quarter:</td>
<td>Date Prepared:</td>
</tr>
</tbody>
</table>

This form should be prepared and signed by Water System personnel with appropriate authority to implement the directives of the Citation and the Corrective Action Plan. Please attach additional sheets as necessary. The quarterly progress report must be submitted by the 10th day of each subsequent quarter, to San Bernardino County, Division of Environmental Health Services.

Summary of Corrective Action Plan:

Tasks completed in the reporting quarter:

Tasks remaining to complete:

Anticipated compliance date: ________________

Printed Name

Title

Signature

Date
ATTACHMENT 6. COMPLIANCE ORDER NO.
05_66_17R_007_3601015_02
IN RE: Ironwood Camp  
Water System No.: 3601015

TO: Ironwood Camp  
Attn: Andrew Pust  
49191 Cherokee Road  
Newberry Springs, CA 92365

COMPLIANCE ORDER AMENDMENT  
FOR  
VIOLATION OF HEALTH AND SAFETY CODE SECTION 116555 (a) (1)  
AND THE PRIMARY DRINKING WATER STANDARD  
FOR ARSENIC AND FLUORIDE  

Issued March 22, 2017

The Division of Environmental Health Services (hereinafter "Division"), hereby issues this compliance order (hereinafter "Order") pursuant to Section 116555 of the California Health and Safety Code (hereinafter “CHSC”) to Ironwood Camp Water System (hereinafter “Water System”) and its owner of record for violation of CHSC section 116555(a) (1) and Title 22, California Code of Regulations (hereinafter "CCR"), Section 64431.

APPLICABLE AUTHORITIES
The applicable statues and regulations are provided in Attachment A, attached hereto and incorporated by reference.

STATEMENT OF FACTS
The Water System is a privately owned water system located in San Bernardino County that supplies water to 25 yearlong residents, 36 employees working more than six months out of the year, and up to 300 campers per week. The Water System is permitted as a community public water system as defined in CHSC, Section 116275 (k). The Water System utilizes one groundwater well (Main Camp Well, Well No. 2) as its source of domestic water. Title 22, CCR, Division 4, Chapter 15, Article 4, establishes primary drinking water standards and monitoring and reporting requirements for inorganic constituents, including arsenic and fluoride. All public water systems must comply with the maximum contaminant level (MCL) for arsenic of 10 µg/L and fluoride of 2.0 mg/L, as established in Title 22 CCR Section 64431.

The current running annual average (RAA) from Well 2 on October 6, 2016, was established at an average arsenic concentration of 35.75 µg/L shown in Table 1; and 5.02 mg/L for fluoride as shown in Table 2. The current RAAs for the active groundwater
Well 2 exceed the arsenic and fluoride MCL. The Division has determined that the Water System has violated the arsenic and fluoride MCL.

Table 1: Arsenic Analysis Result and RAA for Well 2

<table>
<thead>
<tr>
<th>Well 2 Arsenic</th>
<th>01/21/2016</th>
<th>04/07/2016</th>
<th>07/07/2016</th>
<th>10/06/2016</th>
<th>RAA (µg/L)</th>
</tr>
</thead>
<tbody>
<tr>
<td>PS Code 3600036-003</td>
<td>23</td>
<td>38</td>
<td>43</td>
<td>39</td>
<td>35.75</td>
</tr>
</tbody>
</table>

Table 2: Fluoride Analysis Result and RAA for Well 2

<table>
<thead>
<tr>
<th>Well 2 Fluoride</th>
<th>01/21/2016</th>
<th>04/07/2016</th>
<th>07/14/2016</th>
<th>10/06/2016</th>
<th>RAA (mg/L)</th>
</tr>
</thead>
<tbody>
<tr>
<td>PS Code 3600036-003</td>
<td>5</td>
<td>4.9</td>
<td>5.3</td>
<td>4.9</td>
<td>5.02</td>
</tr>
</tbody>
</table>

The Water System currently maintains a reverse osmosis (RO) treatment system, which effectively removes arsenic and fluoride. The treated water is supplied to the coffee shop, dining hall, and drinking fountains located on the K through 12 campus. However, the RO system is not a centralized treatment unit and there continues to be areas within the camp receiving water in excess of the arsenic and fluoride MCL.

**DETERMINATIONS**

Based on the above Statement of Facts, the Division has determined that the Water System and its owner of record have violated CHSC, Section 116555 and Section 64431 in that groundwater Well 2 exceeds the arsenic and fluoride MCL.

**DIRECTIVES**

The Water System and its owner of record are hereby directed to take the following actions:

1. On or before **June 30, 2018**, comply with Title 22, CCR, and Section 64431 and remain in compliance.

2. On or before **April 5, 2017**, submit a written response to the Division indicating its agreement to comply with the directives of this Order and with the Corrective Action Plan addressed herein.

3. Commencing on the date of service of this Order, provide quarterly public notification in accordance with Attachment B, hereto, of the Water System’s failure to meet the arsenic and fluoride MCL. The quarterly notification must include the most recent quarterly arsenic and fluoride results.

4. Commencing on the date of service of this Order, submit proof of each public notification conducted in compliance with Directive No. 3, herein above, within 10 days following the end of the reporting period, using the form provided as Attachment C, hereto.
5. Commencing on the date of service of this Order collect quarterly samples for arsenic and fluoride from Well 2 as well as from the RO effluent (THIS IS CURRENTLY BEING IMPLEMENTED BY THE WATER SYSTEM), as required by Section 64432, and ensure that the analytical results are reported to the Division electronically by the analyzing laboratory no later than the 10th day following the month in which the analysis was completed.

6. Prepare for the Division approval a Corrective Action Plan identifying improvements to the water system designed to correct the water quality problem (violation of the arsenic and fluoride MCL) and ensure that the Water System delivers water to consumers that meets primary drinking water standards. The plan shall include a time schedule for completion of each of the phases of the project such as design, construction, and startup, and a date as of which the Water System will be in compliance with the arsenic and fluoride MCL, which date shall be no later than **April 30, 2017**.

7. On or before **May 10, 2017**, submit the Corrective Action Plan required under Directive No. 6, above, to the Division's offices located at 385 North Arrowhead Avenue, 2nd Floor, San Bernardino, CA 92415.

8. Timely perform the Division-approved Corrective Action Plan and each and every element of said plan according to the time schedule set forth therein.

9. On or before **July 1, 2017**, and every three months thereafter, submit a report to the Division in the form provided as Attachment D, hereto, showing actions taken during the previous calendar three months to comply with the Corrective Action Plan.

10. Not later than ten (10) days following the date of compliance with the arsenic and fluoride MCL, demonstrate to the Division that the water delivered by Water System complies with the arsenic and fluoride MCL.

11. Notify the Division in writing no later than five (5) days prior to the deadline for performance of any Directive set forth herein if Water System anticipates it will not timely meet such performance deadline.

All submittals required by this Order shall be addressed to:

Belinda Huy  
Environmental Health Specialist  
Division of Environmental Health Services  
385 North Arrowhead Avenue, 2nd Floor, San Bernardino, CA 92415  

As used in this Order, the date of issuance shall be the date of this Order; and the Date of service shall be the date of service of this Order, personal or by certified mail, on the Water System.

The Division reserves the right to make such modifications to this Order and/or to issue such further order(s) as it may deem necessary to protect public health and safety. Such modifications may be issued as amendments to this Order and shall be deemed effective upon issuance.

Nothing in this Order relieves Water System or its owner of record of its obligation to meet the requirements of the California SDWA, or any regulation, standard, permit or order...
issued thereunder.

**PARTIES BOUND**
This Order shall apply to and be binding upon the Water System, its owners, shareholders, officers, directors, agents, employees, contractors, successors, and assignees.

**SEVERABILITY**
The Directives of this Order are severable, and Water System and its owner of record shall comply with each and every provision hereof, notwithstanding the effectiveness of any other provision.

**FURTHER ENFORCEMENT ACTION**
The California SDWA authorizes the Division to: issue a citation with assessment of administrative penalties to a public water system for violation or continued violation of the requirements of the California SDWA or any regulation, permit, standard, citation, or order issued or adopted thereunder including, but not limited to, failure to correct a violation identified in a citation or compliance order. The California SDWA also authorizes the Division to take action to suspend or revoke a permit that has been issued to a public water system if the public water system has violated applicable law or regulations or has failed to comply with an order of the Division. The Division does not waive any further enforcement action by issuance of this Order.

Belinda Huy  
Environmental Health Specialist  
Division of Environmental Health Services  
San Bernardino County  
385 N. Arrowhead Ave., 2nd Floor  
San Bernardino, CA 92415  
(800) 442 - 2283

Certified Mail No. 7012 2900 0000 1369 2394

Attachments:  
Attachment A: Applicable Authorities  
Attachment B: Tier 2 Public Notification Instructions and Template  
Attachment C: Proof of Notification Template  
Attachment D: Quarterly Progress Report Template
CHSC, Section 116555(a)(1) states in relevant part:

(a) Any person who owns a public water system shall ensure that the system does all of the following:
   (1) Complies with primary and secondary drinking water standards.

CHSC, Section 116655 states in relevant part:

(a) Whenever the department determines that any person has violated or is violating this chapter, or any permit, regulation, or standard issued or adopted pursuant to this chapter, the director may issue an order doing any of the following:
   (1) Directing compliance forthwith.
   (2) Directing compliance in accordance with a time schedule set by the department.
   (3) Directing that appropriate preventive action be taken in the case of a threatened violation.

(b) An order issued pursuant to this section may include, but shall not be limited to, any or all of the following requirements:
   (1) That the existing plant, works, or system be repaired, altered, or added to.
   (2) That purification or treatment works be installed.
   (3) That the source of the water supply be changed.
   (4) That no additional service connection be made to the system.
   (5) That the water supply, the plant, or the system be monitored.
   (6) That a report on the condition and operation of the plant, works, system, or water supply be submitted to the department.

Title 22, California Code of Regulations (CCR), Section 64431, states in relevant part:

Public water systems shall comply with the primary MCLs in table 64431-A as specified in this article.

Table 64431-A
Maximum Contaminant Levels
Inorganic Chemicals

<table>
<thead>
<tr>
<th>Chemical</th>
<th>Maximum Contaminant Level</th>
</tr>
</thead>
<tbody>
<tr>
<td>Arsenic</td>
<td>10 µg/L</td>
</tr>
<tr>
<td>Fluoride</td>
<td>2 mg/L</td>
</tr>
</tbody>
</table>

Title 22, CCR, Section 64432, states in relevant part:

(a) All public water systems shall monitor to determine compliance with the nitrate and nitrite MCLs in table 64431-A, pursuant to subsections (d) through (f) and Section 64432.1. All community and nontransient-noncommunity water systems shall monitor to determine compliance with the perchlorate MCL, pursuant to subsections (d), (e), and (l), and section 64432.3. All community and nontransient-noncommunity water systems shall also monitor to determine compliance with the other MCLs in table 64431-A, pursuant to subsections (b) through (n) and, for asbestos, section 64432.2. Monitoring shall be conducted in the year designated by the State Board of each compliance period beginning with the compliance period starting January 1, 1993.

(c) Unless more frequent monitoring is required pursuant to this Chapter, the frequency of monitoring for the inorganic chemicals listed in table 64431-A, except for asbestos, nitrate/nitrite, and perchlorate, shall be as follows:
   (1) Each compliance period, all community and nontransient-noncommunity systems using groundwater shall monitor once during the year designated by the State Board. The State Board will designate the year based on historical monitoring frequency and laboratory capacity. All
community and nontransient-noncommunity systems using approved surface water shall monitor annually. All systems monitoring at distribution entry points which have combined surface and groundwater sources shall monitor annually.

(2) Quarterly samples shall be collected and analyzed for any chemical if analyses of such samples indicate a continuous or persistent trend toward higher levels of that chemical, based on an evaluation of previous data.

Appendix 64465-D. Health Effects Language
Inorganic Contaminants.

<table>
<thead>
<tr>
<th>Contaminant</th>
<th>Health Effects Language</th>
</tr>
</thead>
<tbody>
<tr>
<td>Arsenic</td>
<td>Some people who drink water containing arsenic in excess of the MCL over many years may experience skin damage or circulatory system problems, and may have an increased risk of getting cancer.</td>
</tr>
<tr>
<td>Fluoride</td>
<td>This is an alert about your drinking water and a cosmetic dental problem that might affect children under nine years of age. At low levels, fluoride can help prevent cavities, but children drinking water containing more than 2 milligrams per liter (mg/L) of fluoride may develop cosmetic discoloration of their permanent teeth (dental fluorosis). The drinking water provided by your community water system [name] has a fluoride concentration of [insert value] mg/L. Dental fluorosis may result in a brown staining and/or pitting of the permanent teeth. This problem occurs only in developing teeth, before they erupt from the gums. Children under nine should be provided with alternative sources of drinking water or water that has been treated to remove the fluoride to avoid the possibility of staining and pitting of their permanent teeth. You may also want to contact your dentist about proper use by young children of fluoride containing products. Older children and adults may safely drink the water. Drinking water containing more than 4 mg/L of fluoride can increase your risk of developing bone disease. For more information, please call County Special District at 909-387-5940. Some home water treatment units are also available to remove fluoride from drinking water. To learn more about available home water treatment units, you may call the State Board’s Residential Water Treatment Device Registration Unit at (916) 449-5600</td>
</tr>
</tbody>
</table>
Typical Origins of Contaminants with Primary MCLs, MRDLs
Regulatory Action Levels, and Treatment Techniques

<table>
<thead>
<tr>
<th>Inorganic Contaminant</th>
<th>Major origins in drinking water</th>
</tr>
</thead>
<tbody>
<tr>
<td>Arsenic</td>
<td>Erosion of natural deposits; runoff from orchards; glass and electronics production wastes</td>
</tr>
<tr>
<td>Fluoride</td>
<td>Erosion of natural deposits; water additive that promotes strong teeth; discharge from fertilizer and aluminum factories</td>
</tr>
</tbody>
</table>

Title 22, CCR, Section 64482, states in relevant part:

(a) A system that detects arsenic at levels above 0.005 mg/L, but below or equal to the MCL, shall include the following in its Consumer Confidence Report: “While your drinking water meets the federal and state standard for arsenic, it does contain low levels of arsenic. The arsenic standard balances the current understanding of arsenic's possible health effects against the costs of removing arsenic from drinking water. The U.S. Environmental Protection Agency continues to research the health effects of low levels of arsenic, which is a mineral known to cause cancer in humans at high concentrations and is linked to other health effects such as skin damage and circulatory problems.”
Since exceeding the arsenic maximum contaminant level (MCL) is a Tier 2 violation, you must provide public notice to persons served as soon as practical but within 30 days after you learn of the violation [California Code of Regulations Title 22, Chapter 15, Section 64463.4(b)]. 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.

<table>
<thead>
<tr>
<th>If You Are a...</th>
<th>You Must Notify Consumers by...</th>
<th>...and By One or More of the Following Methods to Reach Persons Not Likely to be Reached by the Previous Method...</th>
</tr>
</thead>
</table>
| Community Water System [64463.4(c)(1)] | Mail or direct delivery (a) | Publication in a local newspaper  
Posting in conspicuous public places served by the water system or on the Internet (b)  
Delivery to community organizations |
| Non-Community Water System [64463.4(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 on the Internet or intranet (b)  
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. 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 health effects and notification language in italics unchanged. This language is mandatory [64465].
**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 Action**

In your notice, describe corrective actions you are taking. Do not use overly technical terminology when describing treatment methods. Listed below are some steps commonly taken by water systems with chemical or radiological violations. Use one or more of the following actions, if appropriate, or develop your own:

- “We are working with [local/state agency] to evaluate the water supply and researching options to correct the problem. These options may include treating the water to remove arsenic or connecting to [system]’s water supply.”
- “We have stopped using the contaminated well. We have increased pumping from other wells, and we are investigating drilling a new well.”
- “We will increase the frequency at which we test the water for arsenic.”
- “We have since taken samples at this location and had them tested. They show that we meet the standards.”

**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.
Ironwood Camp Water System Has Levels of Arsenic and Fluoride Above the Drinking Water Standard

Our water system recently violated a drinking water standard. Although this is not an emergency, as our customers, you have a right to know what you should do, what happened, and what we are doing to correct this situation.

We routinely monitor for the presence of drinking water contaminants. Water sample results received on [date] showed arsenic levels of [level and units] and fluoride levels of [level and units]. This is above the standard, or maximum contaminant level (MCL), of 10 micrograms per liter for arsenic and 2 milligrams per liter for fluoride.

What should I do?

- You do not need to use an alternative water supply (e.g., bottled water).
- This is not an emergency. If it had been, you would have been notified immediately. However, some people who drink water containing arsenic in excess of the MCL over many years may experience skin damage or circulatory system problems, and may have an increased risk to getting cancer. At low levels, fluoride can help prevent cavities, but children drinking water containing fluoride in excess of the MCL may develop brown staining and/or pitting of their permanent teeth (dental fluorosis). Drinking water containing more than 4 milligrams per liter of fluoride can increase your risk of developing bone disease.

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

What happened? What is being done?

[Describe corrective action]. We anticipate resolving the problem within [estimated time frame].

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 **Ironwood Camp Water System**.

State Water System ID#: **3601015**. Date distributed: ____________.

This form, when completed and returned to San Bernardino County, Division of Environmental Health Services (385 North Arrowhead Ave, 2nd Floor, San Bernardino, CA 92415 or fax to 909-387-4323, serves as certification that public notification to water users was completed as required by Title 22, California Code of Regulations, Sections 64463-64465.

Public Water System Name: ________________________________

Public Water System No.: _________________________________

☐ The notice was mailed to users on: ________________________________
  A copy of the notice is attached.

☐ The notice was hand delivered to water customers on: __________________________
  A copy of the notice is attached.

☐ The notice was published in the local newspaper on: __________________________
  A copy of the newspaper notice is attached.

☐ The notice was published in conspicuous places on: __________________________
  A copy of the notice is attached.
  A list of locations the notice was posted is attached.

☐ The notice was delivered to community organizations on: ______________________
  A copy of the notice is attached.
  A list of community organizations the notice was delivered to is attached.
I hereby certify that the above information is factual.

Printed Name

Title

Signature

Date

Disclosure: Be advised that Section 116725 and 116730 of the California Health and Safety Code state 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 separate violation each day that the 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 the county jail not to exceed one year, or by both the fine and imprisonment.

System Number: 3601015
Enforcement Action Amendment
### Quarterly Progress Report

| Water System: **Ironwood Camp Water System** | Water System No.: **3601015** |
| Compliance Order Amendment | Violation: **Arsenic and Fluoride MCL** |

| Calendar Quarter: | Date Prepared: |

This form should be prepared and signed by Water System personnel with appropriate authority to implement the directives of the Compliance Order and the Corrective Action Plan. Please attach additional sheets as necessary. The quarterly progress report must be submitted by the 10th day of each subsequent quarter, to San Bernardino County, Division of Environmental Health Services.

**Summary of Compliance Plan:**

**Tasks completed in the reporting quarter:**

**Tasks reaming to complete:**

**Anticipated compliance date: __________________**

---

Printed Name

Title

Signature

Date

*State Water Resources Control Board*