January 27, 2017

System No. 4310013

Mr. Tom Ziglerman
Director of Water Resources & Civil Infrastructure
Stanford University
Facilities Operations – Utilities
327 Bonair Siding Road
Stanford, CA 94305

CITATION NO. 02_17_17C_002
HAA5 MAXIMUM CONTAMINANT LEVEL EXCEEDANCE
FOR FIRST THROUGH FOURTH QUARTERS OF 2016

Enclosed is a Citation issued to the Stanford University (hereinafter, “System”) public water system for failure to comply with the HAA5 maximum contaminant level for the first through fourth quarters of 2016.

If you have any questions regarding this Citation, please contact Ms. Van Tsang at (510) 620-3602.

Sincerely,

Eric Lacy, P.E.
District Engineer
Santa Clara District
Drinking Water Field Operations Branch
Division of Drinking Water

cc: Santa Clara County Environmental Health
STATE OF CALIFORNIA  
STATE WATER RESOURCES CONTROL BOARD  
DIVISION OF DRINKING WATER  

Name of Public Water System: Stanford University  
Water System No: 4310013  

Attention: Mr. Tom Zigterman  
Director of Water Resources & Civil Infrastructure  
Facilities Operations - Utilities  
327 Bonair Siding Road  
Stanford, CA 94305  

Issued: January 27, 2017  

CITATION FOR NONCOMPLIANCE  
HAA5 Maximum Contaminant Level Exceedance  
California Code of Regulations, Section 64533 (a)  
First through Fourth Quarters of 2016  

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

The State Board, acting by and through its Division of Drinking Water (hereinafter "Division") and the Deputy Director for the Division, hereby issues this citation pursuant to Section 116650 of the CHSC to the Stanford University (hereinafter "System") for violation of the California Code of Regulations (CCR), Title 22, Section 64533 (a).

A copy of the applicable statutes and regulations are included in Appendix 1, which is attached hereto and incorporated by reference.

STATEMENT OF FACTS

The System is classified as a community water system with a population of approximately 30,486, serving 1,494 connections. Water supply for the system is treated surface water purchased from the San Francisco Public Utilities Commission (SFPUC) Regional Water System (RWS).

In accordance with CCR, Title 22, Section 64534.2 (d), community water systems providing an approved surface water that contains a chemical disinfectant to 10,000 – 49,999 persons are required to collect four (4) dual sample sets per quarter to determine compliance with the Haloacetic acids (five) (HAA5) maximum contaminant level (MCL) of 0.060 mg/L, based on a locational running annual average (LRAA).

The System collected, among other quarterly samples, four quarterly HAA5 samples from 75 Alta Road, Primary Station Code 4310013-903, in 2016. The sample dates and results are as follow:
<table>
<thead>
<tr>
<th>Sample Date</th>
<th>HAA5 (mg/L)</th>
</tr>
</thead>
<tbody>
<tr>
<td>2/10/2016</td>
<td>0.061</td>
</tr>
<tr>
<td>6/1/2016</td>
<td>0.064</td>
</tr>
<tr>
<td>9/7/2016</td>
<td>0.044</td>
</tr>
<tr>
<td>12/14/2016</td>
<td>0.086</td>
</tr>
</tbody>
</table>

The HAA5 LRAA for samples collected during the first through fourth quarters of 2016 is 0.064 mg/L, which exceeds the MCL of 0.060 mg/L.

DETERMINATION
The Division has determined that the System failed to comply with CCR, Title 22, Section 64533 (a). Specifically, the System failed to comply with the MCL for HAA5 for the first through fourth quarters of 2016 at the 75 Alta Road sample site.

DIRECTIVES
The System is hereby directed to take the following actions:

1. Forthwith, the System shall cease and desist from failing to comply with the MCL for HAA5.

2. Within thirty (30) days of receipt of this citation, System shall produce and provide to the Division a Corrective Action Plan (CAP). The CAP shall describe measurements the System will implement to prevent the water served to the community from exceeding the HAA5 MCL.

3. The System shall conduct public notification for the HAA5 MCL violation in conformance with CCR, Title 22, Section 64463.4 within
thirty (30) days upon receipt of this Citation. The notification shall be completed in accordance with each of the following methods:

a. Mail or direct delivery to each customer receiving a bill including those that provide their drinking water to others (e.g., schools, 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, etc.):
   i. Publication in a local newspaper; or
   ii. Posting in conspicuous public places served by the water system, or on the Internet.

A sample copy of the public notification is enclosed for your reference and use (Appendix 2). The completed notice shall be submitted to the Division for review and approval prior to delivery, publication and/or posting.

4. Within ten (10) days of completion of the public notification, System shall provide to the Division certification of public notification using the enclosed form (Appendix 3). A copy of the notice shall be attached to the certification form.

5. Within ten (10) days of receipt of this citation, System shall agree in writing to comply with all directives of this Citation.
All submittals required by this Citation shall be electronically submitted to the Division at the following address. The subject line for all electronic submittals corresponding to this citation shall include the following information: Water System name and number, citation number and title of the document being submitted.

Eric Lacy, P.E.
District Engineer
State Water Resources Control Board
Division of Drinking Water
Eric.Lacy@waterboards.ca.gov
Dwpdist17@waterboards.ca.gov

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

Nothing in this Citation relieves the System of its obligation to meet the requirements of the California SDWA (CHSC, Division 104, Part 12, Chapter 4, commencing with Section 116270), or any regulation, standard, permit or order issued or adopted thereunder.

PARTIES BOUND

This Citation shall apply to and be binding upon the System, its owners, shareholders, 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.

FURTHER ENFORCEMENT ACTION

The California SDWA authorizes the State Board to: issue a citation or order 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 State Board 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 State Board, and to petition the superior court to take various enforcement measures against a public water system that has failed to comply with an order of the State Board. The State Board does not waive any further enforcement action by issuance of this Citation.

January 27, 2017

Eric Lacy, P.E.
District Engineer
Santa Clara District
State Water Resources Control Board
Division of Drinking Water

Appendices

1. Applicable Statutes and Regulations
2. Public Notification Template
3. Public Notification Certification Form

Certified Mail No. 7014 3490 0001 7031 3810

cc: Santa Clara County Environmental Health
APPENDIX 1. APPLICABLE STATUTES AND REGULATIONS FOR
CITATION NO. 02_17_17C_002

NOTE: The following language is provided for the convenience of the recipient, and cannot be relied upon as the State of California's representation of the law. The published codes are the only official representation of the law. Regulations related to drinking water are in Titles 22 and 17 of the California Code of Regulations. Statutes related to drinking water are in the Health & Safety Code, the Water Code, and other codes.

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...

(k) (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 and any 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 state board 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 state board 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 state board 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 and shall be in addition to any liability or penalty imposed under any other law.

California Code of Regulations, Title 22 (CCR):

Article 2. Maximum Contaminant Levels for Disinfection Byproducts and Maximum Residual Disinfectant Levels
§64533. Maximum Contaminant Levels for Disinfection Byproducts.
(a) Using the monitoring and calculation methods specified in sections 64534, 64534.2, 64535, and 64535.2, the primary MCLs for the disinfection byproducts shown in table 64533-A shall not be exceeded in drinking water supplied to the public.

<table>
<thead>
<tr>
<th>Disinfection Byproduct</th>
<th>Maximum Contaminant Level (mg/L)</th>
<th>Detection Limit for Purposes of Reporting (mg/L)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total trihalomethanes (TTHM)</td>
<td>0.080</td>
<td></td>
</tr>
<tr>
<td>Bromodichloromethane</td>
<td>0.0010</td>
<td></td>
</tr>
<tr>
<td>Bromoform</td>
<td>0.0010</td>
<td></td>
</tr>
<tr>
<td>Chloroform</td>
<td>0.0010</td>
<td></td>
</tr>
<tr>
<td>Dibromochloromethane</td>
<td>0.0010</td>
<td></td>
</tr>
<tr>
<td>Haloacetic acids (five) (HAA5)</td>
<td>0.060</td>
<td></td>
</tr>
<tr>
<td>Monochloroacetic Acid</td>
<td>0.0020</td>
<td></td>
</tr>
<tr>
<td>Dichloroacetic Acid</td>
<td>0.0010</td>
<td></td>
</tr>
<tr>
<td>Trichloroacetic Acid</td>
<td>0.0010</td>
<td></td>
</tr>
<tr>
<td>Monobromoacetic Acid</td>
<td>0.0010</td>
<td></td>
</tr>
<tr>
<td>Dibromoacetic Acid</td>
<td>0.0010</td>
<td></td>
</tr>
<tr>
<td>Bromate</td>
<td>0.010</td>
<td></td>
</tr>
<tr>
<td>Chlorite</td>
<td>1.0</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

§64534.2. Disinfection Byproducts Monitoring.
(d) By the applicable date specified in section 64530(d), and in lieu of TTHM and HAA5 monitoring in subsection (a):
(1) Community and nontransient noncommunity water systems shall monitor for TTHM and HAA5 at the frequencies and location totals indicated in table 64534.2-C and in accordance with the monitoring plan developed pursuant to section 64534.8;
<table>
<thead>
<tr>
<th>Source water type</th>
<th>Persons served</th>
<th>Minimum monitoring frequency&lt;sup&gt;1&lt;/sup&gt;</th>
<th>Monitoring period&lt;sup&gt;2&lt;/sup&gt;</th>
</tr>
</thead>
<tbody>
<tr>
<td>Systems using approved surface</td>
<td></td>
<td><strong>Number of distribution system</strong></td>
<td></td>
</tr>
<tr>
<td>water</td>
<td></td>
<td><strong>monitoring locations</strong></td>
<td></td>
</tr>
<tr>
<td>≥5,000,000</td>
<td>20 dual sample sets</td>
<td>per quarter</td>
<td></td>
</tr>
<tr>
<td>1,000,000 – 4,999,999</td>
<td>16 dual sample sets</td>
<td>per quarter</td>
<td></td>
</tr>
<tr>
<td>250,000 – 999,999</td>
<td>12 dual sample sets</td>
<td>per quarter</td>
<td></td>
</tr>
<tr>
<td>50,000 – 249,999</td>
<td>8 dual sample sets</td>
<td>per quarter</td>
<td></td>
</tr>
<tr>
<td>10,000 – 49,999</td>
<td>4 dual sample sets</td>
<td>per quarter</td>
<td></td>
</tr>
<tr>
<td>3,301 – 9,999</td>
<td>2 dual sample sets</td>
<td>per quarter</td>
<td></td>
</tr>
<tr>
<td>500 – 3,300</td>
<td>1 TTHM and 1 HAA5 sample: one at the location with the highest TTHM measurement, one at the location with the highest HAA5 measurement</td>
<td>per quarter</td>
<td></td>
</tr>
<tr>
<td>&lt;500</td>
<td>1 TTHM and 1 HAA5 sample: one at the location with the highest TTHM measurement, one at the location with the highest HAA5 measurement</td>
<td>per year</td>
<td></td>
</tr>
</tbody>
</table>
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 Haloacetic Acids Above Drinking Water Standard

Our water system violated the Haloacetic Acids five (HAA5) drinking water standard for the first through fourth quarters of 2016. 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.

[Describe the violation].

What should I do?

- You do not need to boil your water or take other actions.
- This is not an emergency. If it had been, you would have been notified immediately.
- Some people who drink water containing haloacetic acids in excess of the MCL over many years may have an increased risk of getting cancer.
- If you have other health issues concerning the consumption of this water, you may wish to consult with your doctor.

What happened? What is being done?

[Describe corrective action].

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

Please share this information with all the other people who drink this water, especially those who may not have received this notice directly (for example, people in apartments, nursing homes, schools, and businesses). You can do this by posting this public notice in a public place or distributing copies by hand or mail.

Secondary Notification Requirements

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

- SCHOOLS: Must notify school employees, students, and parents (if the students are minors).
Appendix 2

- 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: ___________.
Appendix 3
PROOF OF COMPLIANCE
Citation Number 02_17_17C_002
Stanford University
System Number: 4310013

As required by Section 116450 of the California Health and Safety Code, I notified the users of the water supplied by the Stanford University of the HAA5 maximum contaminant level violation of CCR, Title 22, Section 64533 (a) for the first through fourth quarters of 2016.

I complied with the directives of this citation as indicated below:

Required Action                  Date Completed

1. Public notification
   a. Mail and/or direct delivery
   b. Publication in newspaper or posting in conspicuous places

Signature of Water System Representative  Date

THIS FORM MUST BE COMPLETED AND RETURNED TO THE DEPARTMENT. A COPY OF THE DELIVERED OR MAILED NOTICE MUST BE ATTACHED TO THIS FORM

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 citation 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.