

State Water Resources Control Board

Division of Drinking Water

July 3, 2015

Water System No. 3500526

Mr. Mark Wright, Managing Partner
McCloskey Road LLC
P. O. Box 2072
Hollister, CA 95024

Attention Mr. Wright:

COMPLIANCE ORDER NO. 02_05_15R_002 HEXAVALENT CHROMIUM MCL EXCEEDANCE FOR WELL 01

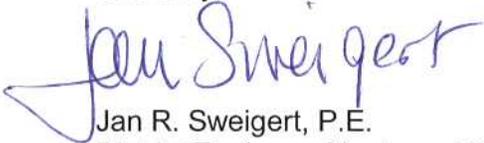
Enclosed is a Compliance Order issued to McCloskey Road, LLC (System) public water system.

The System will be billed at the State Water Resources Control Board's (Water Board) hourly rate (currently estimated at \$128.00) for the time spent on issuing this Compliance Order. California Health and Safety Code Section 116577 provides that a public water system must reimburse the Water Board for actual costs incurred by the Water Board for specified enforcement actions, including, but not limited to, preparing, issuing, and monitoring compliance with a compliance order. At this time, the Water Board has spent approximately two hours on enforcement activities associated with this violation.

The System will receive a bill sent from the Drinking Water Fee Branch in August of the next fiscal year. This bill will contain fees for any enforcement time spent on the System for the current fiscal year.

If you have any questions regarding this matter, please contact Lora Lyons of my staff at (831) 655-6942 or me at (831) 655-6934.

Sincerely,



Jan R. Sweigert, P.E.
District Engineer, Monterey District Office
Northern California Field Operations Branch
Division of Drinking Water

Enclosures

Certified Mail No. 7008-1830-0004-5435-0752

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STATE OF CALIFORNIA
STATE WATER RESOURCES CONTROL BOARD
DIVISION OF DRINKING WATER

TO: McCloskey Road, LLC

Water System No: 3500526

Attn: Mr. Mark Wright, Managing Partner
P. O. Box 2072
Hollister, CA 95024

COMPLIANCE ORDER NO. 02_05_15R_002
VIOLATION OF HEALTH AND SAFETY CODE SECTION 116555 (a)(1) AND (a)(3)
AND TITLE 22, CALIFORNIA CODE OF REGULATIONS, SECTION 64431

Issued on July 3, 2015

Section 116655 of the California Health & Safety Code (hereinafter "CHSC") authorizes the State Water Resources Control Board (hereinafter "Water Board"), acting by and through its Division of Drinking Water (hereinafter "Division") to issue a compliance order to a public water system when the Water Board determines that the public water system has violated or is violating the California Safe Drinking Water Act (CHSC, Division 104, Part 12, Chapter 4 (hereinafter "California SDWA"), or any permit, regulation, or standard issued or adopted thereunder.

The Division hereby issues this compliance order (hereinafter "Order") to McCloskey Road LLC water system (hereinafter System) for violation of CHSC section 116555(a)(1) and (a)(3) and Title 22, California Code of Regulations (hereinafter "CCR"), Section 64431.



1 The applicable statutes and regulations are included in Appendix 1, which is attached
2 hereto and incorporated herein by this reference.

3
4 **STATEMENT OF FACTS**

5
6 The System is classified as a community water system which serves a population of
7 approximately 25 individuals through 14 service connections.

8
9 The System utilizes one active groundwater well identified as Well 01, with the primary
10 source number 3500526-001, as its source of domestic water.

11
12 Samples collected from Well 01 on October 21, 2014 showed a hexavalent chromium
13 concentration of 0.030 mg/L in Well 01. The System began quarterly hexavalent
14 chromium monitoring with the next sample collected on February 24, 2015 showing a
15 concentration of 0.035 mg/L. Title 22, CCR, Section 64432(i) specifies compliance with
16 the hexavalent chromium MCL is based on a running annual average (RAA) of the
17 quarterly monitoring samples, computed each quarter. A summary of the System's
18 hexavalent chromium monitoring results for Well 01 is presented in Table 1 below. All
19 results are as reported to the Division by the laboratory that performed the analysis.

20
21 **Table 1: Well 01 Hexavalent Chromium Monitoring Results**

Sample Quarter	Well 01
4 th Q 2014	0.030 mg/L
1 st Q 2015	0.035 mg/L
RAA (4th Q 2014 + 1st Q 2015) / 4	0.016 mg/L

22

1 The first quarter 2015 RAA for Well 01, calculated as the fourth quarter 2014, plus the
2 first quarter 2015 sample results averaged over a four quarter period, is 0.016 mg/L,
3 which exceeds the hexavalent chromium MCL of 0.010 mg/L.

4 5 **DETERMINATION**

6
7 Title 22, CCR, Division 4, Chapter 15, Article 4, establishes primary drinking water
8 standards and monitoring and reporting requirements for inorganic constituents.
9 Community and nontransient noncommunity water systems must comply with the
10 maximum contaminant level (MCL) for hexavalent chromium of 0.010 mg/L, as
11 established in Title 22, CCR, Section 64431. Section 64432 (i) specifies that compliance
12 with the hexavalent chromium MCL is based on a RAA of the quarterly monitoring
13 samples, computed each quarter. On the basis of the above Statement of Facts, the
14 Division has determined that the System violated CHSC and Title 22 of the CCR.

15
16 These violations include, but are not limited to the following:

- 17
- 18 1. CHSC Section 116555(a)(1). Specifically, the System is operating a water system
19 that produces water that does not comply with a primary drinking water standard at
20 all times.
 - 21
 - 22 2. Section 64431, Chapter 17, Title 22 of the CCR. Specifically, the System has failed
23 to comply with the MCL for hexavalent chromium of 0.010 mg/L
 - 24

25 **ORDER**

26
27 Pursuant to Section 116655 of the Health and Safety Code, the Division hereby orders

1 the Respondent, the System, to take the following actions to ensure that the water
2 system provides a reliable and adequate supply of pure, wholesome, healthful, and
3 potable water:

- 4
- 5 1. Comply with Title 22, CCR, Section 64431 and remain in compliance.
- 6
- 7 2. On or before **July 31, 2015**, submit a written response to the Division indicating its
8 agreement to comply with the directives of this Order and with the Corrective Action
9 Plan addressed herein.
- 10
- 11 3. Commencing on the date of service of this Order, provide quarterly public
12 notification pursuant to Title 22, CCR, Section 64463.4, during any calendar quarter
13 that the four-quarter RAA exceeds the MCL. Appendix 2: Notification Template may
14 be used to fulfill this directive. The notice and methods of notification must be
15 submitted to the Division for approval prior to distribution.
- 16
- 17 4. Commencing on the date of service of this Order, submit proof of each public
18 notification conducted in compliance with Directive No. 3, herein above, within 10
19 days following each such notification, using the form provided as Appendix 3 hereto.
- 20
- 21 5. Commencing on the date of service of this Order, collect quarterly samples for
22 hexavalent chromium from Well 01, as required by Section 64432(a) and (g), and
23 ensure that the analytical results are reported to the Division electronically by the
24 analyzing laboratory no later than the 10th day following the month in which the
25 analysis was completed.
- 26



- 1 6. Prepare a Corrective Action Plan for Division approval that identifies improvements
2 to the System designed to correct the water quality problem (violation of the
3 hexavalent chromium MCL) and ensure that the System delivers water to
4 consumers that meets primary drinking water standards. The plan shall include a
5 time schedule for completion of each of the milestones of the project which may
6 include but are not limited to planning, design, construction, and startup, and a date
7 as of which System will be in compliance with the hexavalent chromium MCL at
8 Well 01.
9
- 10 7. On or before **September 15, 2015** present the Corrective Action Plan required
11 under Directive No. 6, above, to the Division in person at the Division's offices
12 located at 1 Lower Ragsdale Drive, Building 1, Suite 120, in Monterey, California.
13 Please contact the Monterey District office in advance to schedule an appointment.
14
- 15 8. Complete the Division-approved Corrective Action Plan and each and every
16 element of said plan according to the time schedule set forth therein.
17
- 18 9. On or before **January 10, 2016** and every three months thereafter, submit a report
19 to the Division showing actions taken during the previous calendar three months to
20 comply with the Corrective Action Plan, using the form provided as Appendix 4
21 hereto.
22
- 23 10. Not later than ten (10) days following the date of compliance with the hexavalent
24 chromium MCL as specified in the Corrective Action Plan required in Directive 6
25 , demonstrate to the Division that the water delivered by the System's Well 01 complies
26 with the hexavalent chromium MCL.
27

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

4

5 All submittals required by this Order shall be addressed to:

6

7

Jan R. Sweigert, P.E.
District Engineer, Monterey District Office
State Water Resources Control Board, Division of Drinking Water
1 Lower Ragsdale Drive, Building 1, Suite 120
Monterey, CA 93940

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

16

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

21

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

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26

PARTIES BOUND

27

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

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SEVERABILITY

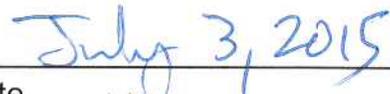
The directives of this Order are severable, and the System shall comply with each and every provision thereof, notwithstanding the effectiveness of any provision.

FURTHER ENFORCEMENT ACTION

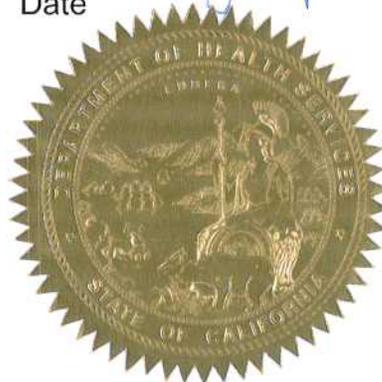
The California SDWA authorizes the Water Board to: issue a citation with assessment of administrative penalties to a public water system for violation or continued violation of the requirements of the California SDWA or any regulation, permit, standard, citation, or order issued or adopted thereunder including, but not limited to, failure to correct a violation identified in a citation or compliance order. The California SDWA also authorizes the Water 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 Water 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 Water Board. The Water Board does not waive any further enforcement action by issuance of this compliance order.



Stefan Cajina, P.E., Chief
North Coastal Section
State Water Resources Control Board
Division of Drinking Water



Date



cc: San Benito County Environmental Health Department (no attachments)

- 1 Appendices (4)
2
3 1) Applicable Statutes and Regulations
4 2) Public Notice
5 3) Certification Form
6 4) Quarterly Progress Report Form
7

8
9 Certified Mail No. 7008-1830-0004-5435-0752

APPENDIX 1

APPLICABLE STATUTES AND REGULATIONS FOR COMPLIANCE ORDER NO. 02_05_15R_002

Section 116655. Of the Health and Safety Code 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.

Section 116555(a)(1) and (a)(3) Of the Health and Safety Code 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.
 - (3) Provides a reliable and adequate supply of pure, wholesome, healthful, and potable water.

Title 22, 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

<i>Chemical</i>	<i>Maximum Contaminant Level, mg/L</i>
Aluminum	1.
Antimony	0.006
Arsenic	0.010
Asbestos	7 MFL*
Barium	1.
Beryllium	0.004
Cadmium	0.005
Chromium	0.05
Cyanide	0.15
Fluoride	2.0
Hexavalent chromium	0.010
Mercury	0.002
Nickel	0.1
Nitrate (as NO ₃)	45.
Nitrate+Nitrite (sum as nitrogen)	10.
Nitrite (as nitrogen)	1.
Perchlorate	0.006
Selenium	0.05
Thallium	0.002

* MFL=million fibers per liter; MCL for fibers exceeding 10 um in length.

Title 22, CCR Section 64432 (a), (g), and (i) 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), (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 Department of each compliance period beginning with the compliance period starting January 1, 1993.
- (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 Department within 48 hours and monitor quarterly beginning in the next quarter after the exceedance occurred; or
 - (2) Inform the Department within seven days from the receipt of the analysis and, as confirmation, collect one additional sample within 14 days from receipt of the analysis. If the average of the two samples collected exceeds the MCL, this information shall be

reported to the Department within 48 hours and the water supplier shall monitor quarterly beginning in the next quarter after the exceedance occurred.

- (i) Compliance with the MCLs shall be determined by a running annual average; if any one sample would cause the annual average to exceed the MCL, the system is immediately in violation. If a system takes more than one sample in a quarter, the average of all the results for that quarter shall be used when calculating the running annual average. If a system fails to complete four consecutive quarters of monitoring, the running annual average shall be based on an average of the available data.

Title 22, CCR Section 64463.4 states in relevant part:

- (a) A water system shall give public notice pursuant to this section if any of the following occurs:
 - (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 Department 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 Department determines that a Tier 2 rather than a Tier 3 public notice is required, based on potential health impacts and persistence of the violations;
 - (3) Other violations of the monitoring and testing procedure requirements in this chapter, and chapters 15.5, 17 and 17.5, for which the Department determines that a Tier 2 rather than a Tier 3 public notice is required, based on potential health impacts and persistence of the violations; 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 Department's written approval based on the violation or occurrence having been resolved and the Department's determination that public health and welfare would in no way be adversely affected. In addition, the water system shall:
 - (1) Maintain posted notices in place for as long as the violation or occurrence continues, but in no case less than seven days;
 - (2) Repeat the notice every three months as long as the violation or occurrence continues. Subject to the Department's written approval based on its determination that public health would in no way be adversely affected, the water system may be allowed to notice less frequently but in no case less than once per year. No allowance for reduced frequency of notice shall be given in the case of a total coliform MCL violation or violation of a Chapter 17 treatment technique requirement; and

(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 Department 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 Department 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 Department 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.

Instructions for Tier 2 Hexavalent Chromium MCL Notice Template

Template Attached

Since exceeding the hexavalent chromium 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.

<i>If You Are a...</i>	<i>You Must Notify Consumers by...</i>	<i>...and By One or More of the Following Methods to Reach Persons Not Likely to be Reached by the Previous Method...</i>
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 hexavalent chromium 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 hexavalent chromium.”
- “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.

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.

McCloskey Road Water System Has Levels of Hexavalent Chromium 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 [dates] showed hexavalent chromium 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 hexavalent chromium 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 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 McCloskey Road water system.

State Water System ID#: 3500526.

Date distributed: _____.

System Representative Name & Title: _____

System Representative Signature: _____

PROOF OF NOTIFICATION

Citation No. 02_05_15R_002

McCloskey Road LLC Water System

System Number: 3500526

Certification

As required by Section 64463.4 of the California Health and Safety Code, I notified the users of the water supplied by the McCloskey Road LLC water system of the violations of Title 22, California Code of Regulations, as indicated below:

Required Action	Date Completed
Mail or Direct delivery of notice	<input type="text"/>
Public Notification – List Secondary Method Used: _____	<input type="text"/>
_____	_____
Signature of Water System Representative	Date

Attach a copy of the notice distributed by the system and proof of alternative method of distribution.

THIS FORM MUST BE COMPLETED AND RETURNED TO THE DIVISION

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

Quarterly Progress Report

Water System: McCloskey Road LLC	Water System No: 3500526
Violation: Hexavalent Chromium MCL Violation	
Calendar Quarter:	Date Prepared:

Summary of Compliance Plan

Tasks Completed in the Quarter

Tasks Remaining to Complete

Anticipate Compliance Date:

System Representative Name & Title: _____

System Representative Signature: _____

This form should be prepared and signed by the 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 must be submitted by the 10th day of the month following the end of each subsequent quarter.