

1 STATE OF CALIFORNIA
2 WATER RESOURCES CONTROL BOARD
3 DIVISION OF DRINKING WATER
4

5 **TO:** Jacumba Community Sanitation District
6 1266 Railroad St
7 Jacumba, Ca 91934

8
9 **Attn:** Richard Alcorn
10 Board Chairman
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12

13 **COMPLIANCE ORDER NO. 05-14-16R-002**

14 **FOR**

15 **VIOLATION OF HEALTH AND SAFETY CODE SECTION 116555 & 116655**

16 **Issued on July 29, 2016**

17
18 The State Water Resources Control Board (hereinafter "Board"), acting by and through its
19 Division of Drinking Water (hereinafter "Division") and the Deputy Director for the Division
20 (hereinafter "Deputy Director"), hereby issues this Compliance Order (hereinafter "Order")
21 pursuant to Section 116655 of the California Health and Safety Code (hereinafter "CHSC")
22 to the Jacumba Community Sanitation District (hereinafter "Water System") for violation of
23 the CHSC Section 116555(a)(1) and Title 22, California Code of Regulations (hereinafter
24 "CCR"), Section 64431.
25

26 **APPLICABLE AUTHORITIES**

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28 **Section 116555 of the CHSC states in relevant part:**

1 (a) Any person who owns a public water system shall ensure that the system does
2 all of the following:

3 (3) Provides a reliable and adequate supply of pure, wholesome, healthful, and
4 potable water.

5
6 **Section 116655 of the CHSC states:**

7 (a) Whenever the department determines that any person has violated or is violating this
8 chapter, or any permit, regulation, or standard issued or adopted pursuant to this chapter,
9 the director may issue an Order doing any of the following:

10 (1) Directing compliance forthwith.

11 (2) Directing compliance in accordance with a time schedule set by the department.

12 (3) Directing that appropriate preventive action be taken in the case of a threatened
13 violation.

14 (b) An Order issued pursuant to this section may include, but shall not be limited to, any or
15 all of the following requirements:

16 (1) That the existing plant, works, or system be repaired, altered, or added to.

17 (2) That purification or treatment works be installed.

18 (3) That the source of the water supply be changed.

19 (4) That no additional service connection be made to the system.

20 (5) That the water supply, the plant, or the system be monitored.

21 (6) That a report on the condition and operation of the plant, works, system, or water
22 supply be submitted to the department.

23

1 **Domestic Water Supply Permit No. 05-14-13PA-004, Provision 10, Issued April 8,**
2 **2013, states in relevant part:**

3 10. Jacumba shall submit a permit amendment application including plans and
4 specifications for the addition of iron and manganese removal treatment to CDPH
5 (Division) within twelve (12) months of issuance of this permit amendment.

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7 **STATEMENT OF FACTS**

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9 The Water System's water source is a single active groundwater well, Well 4, and a
10 standby well, Well 8. Well 4 has a 20-foot sanitary seal, which does not meet the 50-foot
11 minimum standard per the Department of Water Resources Well Standards.

12
13 A spring discharges into a basin at a location that is up-gradient and approximately 320
14 feet to the northeast of Well 4. The low area immediately adjacent to the well is currently
15 the receiving basin for storm water runoff from Old Highway 80. During precipitation events
16 storm water is discharged approximately 75 feet east of the well. The soil in this area has a
17 high percolation rate of approximately <1 min/ft, which may allow surface water to rapidly
18 move through the soils to Well 4 casing's perforations. The GWUDI concern is further
19 elevated due to a historic trend of raw well water total coliform positive events. Based on
20 the well construction, proximity to surface water sources, and historical water quality
21 results, the Division determined that Well 4 may be Groundwater Under the Direct
22 Influence of Surface Water (GWUDI) in Domestic Water Supply Permit No. 05-14-13PA-
23 004, issued April 8, 2013. Wells determined to be GWUDI must meet the treatment
24 requirements of the Federal Long Term 2 Enhanced Surface Water Treatment Rule (LT2),
25 which includes treatment, monitoring and reporting. Well 4 does not have a surface water
26 treatment system.

1 Well 8 was drilled in December 28, 2008 and the Division has determined that the well
2 construction meets the Department of Water Resources Well Standards. Water quality
3 analysis of the Well 8 from samples collected on February 27, 2009, indicates manganese
4 levels of 196 parts per billion (ug/L), which is greater than three times the maximum
5 contaminant level (MCL) of 50 ug/L. Sources that have iron or manganese three times
6 greater than the MCL cannot be issued a waiver to use sequestering as treatment or be
7 permitted as an active source without the installation of iron and manganese removal
8 treatment. Standby sources also cannot be used more than five consecutive days or more
9 than 15 days per year. Permit Amendment (No. 05-14-13PA-004) issued on February 14,
10 2013, allows the Water System to use Well 8 as a standby source, requires that
11 manganese removal treatment be provided prior to changing the status of Well 8 to an
12 active source of drinking water, and required the Water System to submit a permit
13 application including plans and specifications for iron and manganese removal treatment
14 for Well 8 within 12 months of issuance of the Permit Amendment. The Water System has
15 not submitted a permit amendment application including plans and specification for the
16 addition of iron and manganese removal treatment for Well 8, as of the date of this Order.

17
18 The Water system finalized the deed on the well site property on September 18, 2015. The
19 Water System has hired a consultant to draft a Preliminary Engineering Report for the iron
20 and manganese removal treatment system. On June 3, 2016, the Water System submitted
21 a JCSD Well 8 Treatment System Preliminary Project Schedule. [Enclosure 1] The
22 schedule showed that the USDA grant application would be submitted by June 30, 2016.
23 The application was submitted to the USDA on July 8, 2016.

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DETERMINATIONS

Based on the above Statement of Facts and Determinations, the Division has found that the Water System has violated the CHSC, Section 116555 and 116655. Specifically, the Water System has failed to provide a reliable and adequate supply of pure, wholesome, healthful, and potable water, and has failed to comply with provision #10 in Permit No. 05-14-13PA-004.

DIRECTIVES

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

1. The Water System shall complete a Division approved iron and manganese removal treatment project (hereinafter Project) according to the following schedule:
 - a. The Water System shall submit to the Division a copy of the USDA Grant application on or before July 15, 2016.
 - b. The Water System shall submit to the Division the 90% manganese removal treatment system design and specifications by January 15, 2017.
 - c. The Water System shall submit to the Division the final 100% manganese removal treatment system design and specifications on or before y March 31, 2017.
 - d. The Water System shall issue a Notice to Proceed for construction on or before August 1, 2017.
 - e. The Water System shall start the construction phase on or before November 30, 2017

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f. The Water System shall complete the construction and place the Project in operation on or before January 31, 2018.

2. The Water System shall submit a report to the Division by September 10, 2016, and quarterly thereafter, for the Project using the attached Quarterly Progress Report.
3. Notify the Division in writing no later than five (5) days prior to the deadline for any Directive set forth herein if the Water System anticipates it will not meet the submittal due date.

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 the Water System 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

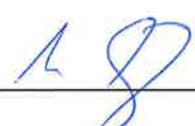
The Directives of this Order are severable, and the Coachella Water Authority shall comply with each and every provision hereof, notwithstanding the effectiveness of any other provision.

FURTHER ENFORCEMENT ACTION

The California SDWA authorizes the Board to: issue a Compliance 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 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 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 Board. The Board does not waive any further enforcement action by issuance of this Order.

8/1/2016

Date



Sean Sterchi, P.E.
District Engineer
Division of Drinking Water
State Water Resources Control Board

1 Certified Mail No: 7015 3010 0001 9444 3262

2 cc: Keith Kezer, Program Coordinator for Department of Environmental Health, County of
3 San Diego

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5 Enclosure:

6 1. JCSD Well 8 Treatment System Preliminary Project Schedule, dated June 3, 2016

7 2. Quarterly Progress Report

Quarterly Progress Report

Water System:	Water System No.:
Compliance Order No.:	Violation:
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 the Division of Drinking Water San Diego District Office.

Summary of Compliance Plan:

Tasks completed in the reporting quarter:

Tasks remaining to complete:

Anticipate compliance date:

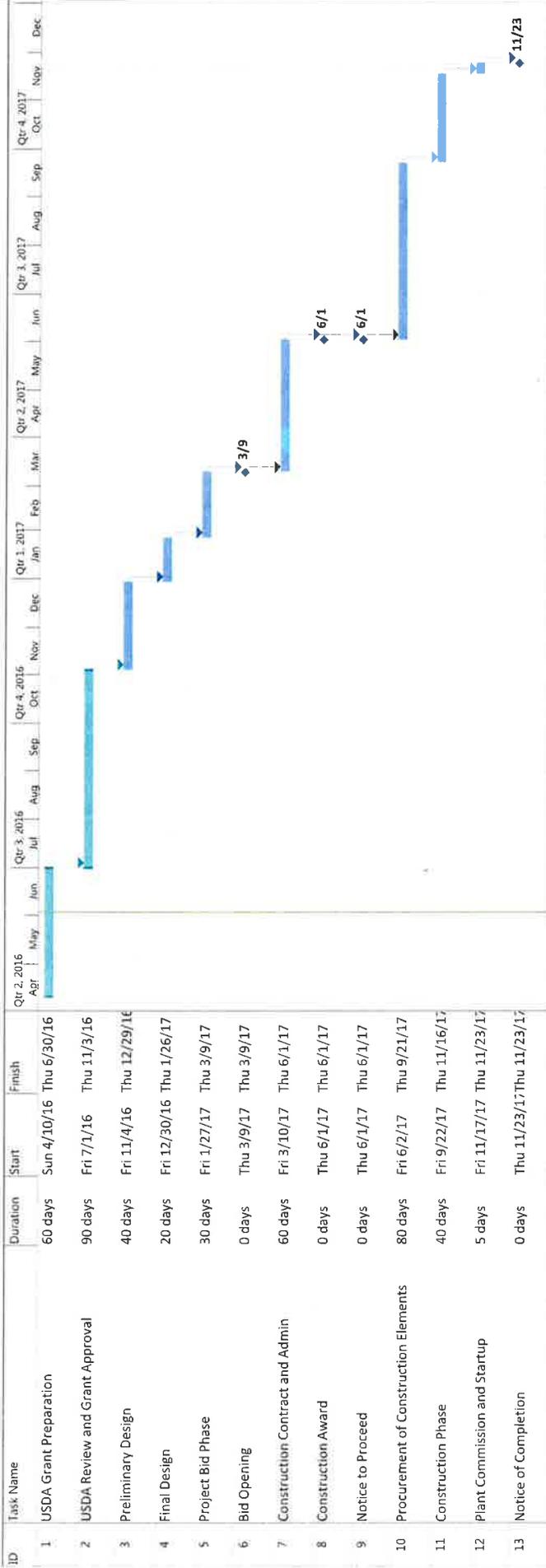
Name

Signature

Title

Date

Jacumba Community Services District Well 7 and 8 Treatment System Project Preliminary Schedule



Project: Well 7-8 Treatment Sched	Task	Project Summary	Manual Task	Start-only	Deadline
Date: Fri 6/3/16	Split	Inactive Task	Duration-only	Finish-only	Progress
	Milestone	Inactive Milestone	Manual Summary Rollup	External Tasks	Manual Progress
	Summary	Inactive Summary	Manual Summary	External Milestone	

