

State of California—Health and Human Services Agency
Department of Health Services



California
Department of
Health Services

SANDRA SHEWRY
Director

ARNOLD SCHWARZENEGGER
Governor

September 6, 2006

Celeste Cantú
Executive Director
State Water Resources Control Board
1001 - I Street
P.O. Box 100
Sacramento, CA 95812

Dear Ms. Cantú:

EMERGENCY NOTIFICATION OF PUBLIC WATER SYSTEMS

Sewage treatment plants and collection systems occasionally release significant amounts of untreated or partially treated sewage into water bodies that are used for drinking water supplies. When this occurs, it is critical that public water systems that might be impacted by the release are notified in a timely manner. Two recent incidents, in which the City of Stockton released untreated or partially treated sewage into the San Joaquin River, underscore this need.

The first incident occurred on June 16, 2006. The City accidentally released roughly eight million gallons of undisinfected secondary effluent to the River from its wastewater treatment plant. Neither the California Department of Health Services (CDHS) nor the affected public water systems found out about the release until the story was reported in the news media several days after it occurred. The second was reported on August 23, 2006. Over a period of three days, an estimated 45,000 gallons of raw sewage was released into the River from a broken sewer. This time, the Central Valley Regional Water Control Board notified CDHS of the release as soon as it found out, and the City contacted some, but not all, of the affected public water systems.

While the response to the second event was a marked improvement, the following issues need to be dealt with:

1. In both instances, the person reporting the spill to the State Office of Emergency Services (OES) asserted that no drinking water systems would be affected by the spill. The OES assumed the reported information to be factual and did not, therefore, report the spills to CDHS. In fact, the spills affected the drinking water supply for over 20 million Californians.
2. While the City made an attempt to contact the affected public water systems, its list of such systems was apparently incomplete. Although all the water systems were eventually notified, this would have happened more rapidly if the City had a complete list to use.

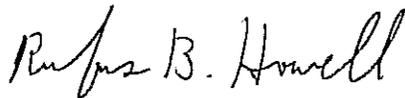
CDHS believes these events point to a need for better coordination and communication between our agency and the various Regional Water Quality Control Boards. Specifically, we propose taking the following actions:

1. When alerted of significant spill events, the Regional Boards' staff should be aware of any public water systems that might be affected by the spill. If it becomes evident that the release has not been contained or there may be adverse affects to downstream public water systems, staff should be instructed to contact the OES Warning Control Center at (800) 852-7550. Board staff should ask OES to notify the CDHS Duty Officer that the spill has occurred, even if the person or entity causing the release denies that any downstream affects will result. In turn, if we become aware of any releases that may have possible adverse environmental affects, our staff will ensure that OES has notified the appropriate regional board office. This should ensure that both of our agencies would be included in the notification process for the areas in which we have regulatory responsibilities.
2. The Regional Boards should make sure that the emergency notification plans used by sewerage system operators include complete, up-to-date contact information for downstream public water systems. The CDHS' Drinking Water Field Operations program would be happy to provide this information through its field offices located throughout the State. If it is possible this information could be a requirement of future waste discharge permits. Our program will attempt to include the contact information for up gradient waste dischargers in our Watershed Sanitary Surveys

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Thank you for your consideration of this matter. Please contact me at (916) 449-5577 if you have any questions.

Sincerely,



Rufus B. Howell, Acting Chief
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and Environmental Management

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