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Director

State of California—Health and Human Services Agency
California Department of Public Health
BOARD OF SUPERVISORS

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CORRESPONDENCE No. 1
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ARNOLD SCHWARZENEGGER
Governor

October 19, 2010

Stanislaus County Board of Supervisors
Ms. Christine Ferraro Tallman
Clerk of the Board of Supervisors
1010 10th Street
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Modesto, CA 95354

Board Members:

LOCAL PRIMACY AGENCY ANNUAL EVALUATION REPORT
FISCAL YEAR 2009-2010

Enclosed is the “Local Primacy Agency Annual Evaluation Report” for the Stanislaus County’s Department of Environmental Resources. The report covers the period from July 1, 2009, through June 30, 2010 (FY 09/10). This evaluation and report are required under Section 116330(d) of the California Health and Safety Code. The purpose of the evaluation is to review the status of the small water system program that is being conducted under the Local Primacy Delegation Agreement in effect between your Department of Environmental Resources and the California Department of Public Health.

The County has met the program objectives that were outlined in the approved FY 09/10 Workplan and the Local Primacy Program requirements set forth in Sections 64253 through 64260 of Title 22 of the California Code of Regulations (CCR). The Department of Environmental Resources has implemented or initiated compliance with the current requirements of the California Safe Drinking Water Act (SDWA) for the small public water systems located within the County.

We look forward to working with your Department of Environmental Resources’ Environmental Health Division during the coming fiscal year. If you have any questions concerning this matter, please contact Bhupinder Sahota at (209) 948-3881 or me at (559) 447-3132.

Sincerely,



Carl L. Carlucci, P.E.
Supervising Sanitary Engineer
Central California Section
SOUTHERN CALIFORNIA BRANCH
DRINKING WATER FIELD OPERATIONS

Enclosure

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Stanislaus County Local Primacy Agency
Annual Program Evaluation
For
Fiscal Year 2009/2010

INTRODUCTION

On September 28, 2010, the California Department of Public Health (CDPH) conducted the annual evaluation of the Stanislaus County Small Water System Program (SWSP) for the fiscal year (FY) 09/10 (7/1/2009 through 6/30/2010). The Stanislaus County's Department of Environmental Resources (DER) has been delegated as a Local Primacy Agency (LPA) and is responsible for the administering the SWSP. The CDPH representative conducting the evaluation was Richard Blood. Representing the LPA were, Janis Mein, Program Manager, and John Aud, Senior Environmental Health Specialist. This evaluation and report are mandated by Section 116330(d) of the California Health and Safety Code (CHSC). The purpose of the evaluation is to determine the program status with respect to meeting objectives set forth in the Stanislaus County Local Primacy Agency Delegation Workplan for FY 09/10.

This report summarizes the findings and recommendations of the Stockton District, Southern California Drinking Water Field Operations Branch. Appendices A through F to the report are the specific findings of the evaluation as it relates to LPA program elements as set forth in Sections 64253 through 64260 of Title 22 California Code of Regulations (22-CCR). The specific findings in appendices A through F are the basis for findings in the summary below and the recommendations that follow.

SUMMARY OF EVALUATION FINDINGS

The County has met the program objectives that were outlined in the approved FY 09/10 Workplan and the Local Primacy Program requirements set forth in Sections 64253 through 64260 of 22-CCR. The Stanislaus County Department of Environmental Resources has implemented or initiated compliance with all current requirements of the California Safe Drinking Water Act (SDWA) for the small public water systems located within the County. The County is making a good effort to achieve compliance with provisions of the SDWA.

Tables 1 through 5 list the water systems that have had Safe Drinking Water Act water quality violations in FY 09/10. The water provided by the water systems on these tables exceeded a Maximum Contaminant Level (MCL), Action Level (AL), Maximum Residual Disinfectant Level (MRDL), or violated a Treatment Technique [(TT) required process intended to reduce the level of a contaminant in drinking water]. Information summaries are provided in the tables below on potential health effects associated with consuming water violating the standard, possible sources of the contaminants, the concentration of the contaminant in the drinking water, public notification of the consumers by the water system, and enforcement actions taken by the County.

Table 1

MCL Violation: Fecal coliforms and E. coli Positive Water Sample Health Effects: Acute

Sources of fecal coliforms and *E. coli* bacteria are human and animal fecal waste. Fecal coliforms and *E. coli* are bacteria whose presence indicates that the water may be contaminated with human or animal wastes. Microbes in these wastes can cause short-term effects, such as diarrhea, cramps, nausea, headaches, or other symptoms. They may pose a special health risk for infants, young children, some of the elderly, and people with severely compromised immune systems.

MCL Violation: Positive Routine Total Coliform Sample and Positive Repeat Total Coliform: Indicator of Possible Acute Health Risk

Coliforms are bacteria that are naturally present in the environment but not normally present in ground water or properly treated surface water. Coliform bacteria are used as an indicator that other, potentially-harmful, bacteria may be present.

Listed below are the water systems that had Total Coliform (TC), Fecal Coliform (FC), or *E. coli* (EC) positive (+) water samples that resulted in a violation. An acute coliform violation occurs when any routine or repeat water is EC or FC positive. A total coliform violation occurs when both the routine water sample is TC positive and the repeat water sample is TC positive.

System Number	System Name	PWS Class	Population Served	Monitoring Frequency	Number of Violations	# of Acute Violations EC+ or FC+	Significant ¹ Noncompliance	Action Taken
5000019	Riverdale Park Tract CSD	CWS	300	Monthly	1	0		MCL, Boil Order, PN, Violation Notice/Reminder Letter-Phone Call
5000041	Maze Blvd MHP	TNC	90	Quarterly	2	0		MCL, Boil Order, PN, Violation Notice/Reminder Letter-Phone Call
oil5000049	Lone Pine MHP	CWS	64	Monthly	1	0		MCL, Boil Order, PN, Violation Notice/Reminder Letter-Phone Call
5000077	Ceres West MHP	CWS	161	Monthly	1	0		MCL, Boil Order, PN, Violation Notice/Reminder Letter-Phone Call
5000090	Pinewood Meadows MHP	CWS	500	Monthly	1	0		MCL, Boil Order, PN, Violation Notice/Reminder Letter-Phone Call
5000099	Del Rio East HOA	CWS	110	Monthly	2	0		MCL, Boil Order, PN, Violation Notice/Reminder Letter-Phone Call
5000110	Fee Water System	TNC	25	Quarterly	1	0		Violation Notice/Reminder Letter-Phone Call; PN
5000133	Hart Ransom School	NTNC	650	Monthly	1	0		MCL, Boil Order, PN, Violation Notice/Reminder Letter-Phone Call
5000138	El Rincon Market	TNC	25	Quarterly	1	0		Violation Notice/Reminder Letter-Phone Call; PN
5000193	Patterson Vegetable Company	NTNC	850	Weekly	2	0		Violation Notice/Reminder Letter-Phone Call; PN
5000202	Joe's Travel Plaza	NTNC	26	Weekly	1	0		Violation Notice/Reminder Letter-Phone Call; PN
5000581	Pioneer Equine Hospital	NTNC	25	Monthly	1	0		MCL, Boil Order, PN, Violation Notice/Reminder Letter-Phone Call

System No. = water system number	NTNC = nontransient noncommunity water system	PN = public notification
PWS = public water supply	TNC = transient noncommunity	Bottle Water = the water system providing bottle water
CWS = community water system	MCL = maximum contaminant level	SWTR = Surface Water Treatment Rule
RAA = Running Annual Average	TT = Treatment Technique	LT1 = Long Term 1 Enhanced Surface Water Treatment Rule

Table 1 (Continued)

System Number	System Name	PWS Class	Population Served	Monitoring Frequency	Number of Violations	# of Acute Violations EC* or FC*	Significant ¹ Noncompliance	Action Taken
5000255	Mountain View Middle School	NTNC	364	Monthly	1	0		MCL, Boil Order, PN, Violation Notice/Reminder Letter-Phone Call
5000263	Oasis Investments	CWS	75	Monthly	1	0		MCL, Boil Order, PN, Violation Notice/Reminder Letter-Phone Call
5000273	Gratton School	NTNC	110	Monthly	1	0		Violation Notice/Reminder Letter-Phone Call; PN
5000284	Rainbow Fields	TNC	25	Quarterly	1	0		MCL, Boil Order, PN, Violation Notice/Reminder Letter-Phone Call
5000295	Shiloh School District	NTNC	105	Monthly	1	0		MCL, Boil Order, PN, Violation Notice/Reminder Letter-Phone Call
5000297	Buehner Houses	CWS	25	Monthly	1	0		MCL, Boil Order, PN, Violation Notice/Reminder Letter-Phone Call
5000298	Orange Blossom Rec. Area	TNC	26	Quarterly	1	0		MCL, Boil Order, PN, Violation Notice/Reminder Letter-Phone Call
5000313	Buehner WS	CWS	150	Monthly	2	0		MCL, Boil Order, PN, Violation Notice/Reminder Letter-Phone Call
5000401	Knights Ferry Recreation Area	NCWS	26	Monthly	1	0		MCL, Boil Order, PN, Violation Notice/Reminder Letter-Phone Call
5000411	United Rentals	NTNC	130	Monthly	1	0		MCL, Boil Order, PN, Violation Notice/Reminder Letter-Phone Call
5000434	Ceres Sports Arena	TNC	25	Quarterly	1	0		Violation Notice/Reminder Letter-Phone Call; PN
5000465	Duarte Nursery	NTNC	75	Monthly	1	0		Violation Notice/Reminder Letter-Phone Call; PN
5000486	Roberts Ferry Nut Co.	TNC	25	Quarterly	1	0		Violation Notice/Reminder Letter-Phone Call; PN
5000507	Gurudwara Guru Nanak Sahib	TNC	109	Quarterly	1	0		MCL, Boil Order, PN, Violation Notice/Reminder Letter-Phone Call
5000530	Frazier Nut Farms	NTNC	40	Monthly	1	0		MCL, Boil Order, PN, Violation Notice/Reminder Letter-Phone Call
5000531	Grace Community Church	TNC	160	Quarterly	1	0		MCL, Boil Order, PN, Violation Notice/Reminder Letter-Phone Call
5000552	Kiernan Business Center	NTNC	120	Monthly	1	0		MCL, Boil Order, PN, Violation Notice/Reminder Letter-Phone Call
5000554	Hughson Nut #2	NTNC	25	Monthly	1	0		Violation Notice/Reminder Letter-Phone Call; PN
5000561	McHenry Golf Center	NCWS	25	Monthly	2	0		MCL, Boil Order, PN, Violation Notice/Reminder Letter-Phone Call
5000571	Waterford Sportsmen's Club	NCWS	25	Quarterly	1	0		Violation Notice/Reminder Letter-Phone Call; PN
5000573	5033 Pentecost	NTNC	302	Monthly	1	0		MCL, Boil Order, PN, Violation Notice/Reminder Letter-Phone Call
5000574	Eastin	NTNC	26	Monthly	1	0		Violation Notice/Reminder Letter-Phone Call; PN

System No. = water system number	NTNC = nontransient noncommunity water system	PN = public notification
PWS = public water supply	TNC = transient noncommunity	Bottle Water = the water system providing bottle water
CWS = community water system	MCL = maximum contaminant level	SWTR = Surface Water Treatment Rule
RAA = Running Annual Average	TT = Treatment Technique	LT1 = Long Term 1 Enhanced Surface Water Treatment Rule

Table 2: Nitrate (as NO₃, MCL = 45 mg/L) based a single sample; Health Effects: Acute

Nitrates can be the result of runoff and leaching from fertilizer use; leaching from septic tanks and sewage; erosion of natural deposits. Infants below the age of six months who drink water containing nitrate in excess of the MCL may quickly become seriously ill and, if untreated, may die because high nitrate levels can interfere with the capacity of the infant's blood to carry oxygen. Symptoms include shortness of breath and blueness of the skin. High nitrate levels may also affect the oxygen-carrying ability of the blood of pregnant women.

System No.	System Name	PWS Class	Population Served	MCL Violation (MCL = 45 mg/L)	Treatment Provided	Date of Last Enforcement Action	PN	Bottled Water?	Comments
5000048	Lazy B MHP	CWS	125	48.2	No				
5000217	Faith Home Teen Ranch	CWS	50	54.6	No	6/30/09	Y	No	New well drilled in 8/2009, technical report submitted to blend water, under review
5000307	Kingdom La Jehovah Witness	TNC	500	78.3	No		Y	Yes	New well placed on-line in 8/2010
5000358	Dairy Farmers of America	NTNC	75	48	No	1/5/10	Y	No	Violation Notice/Reminder Letter-Phone Call; on-going PN
5000383	Dick's Bar and Grill	TNC	26	56	No	4/23/10	Y	Yes	Compliance Order DER-10CO-005, new well to be drilled in 10/2010
5000434	Ceres Sports Arena	TNC	26	58	No	5/8/2007	Y	Yes	System inactivated, food facility closed
5000443	Triangle Truck Stop	TNC	25	49	No				All subsequent monitoring noted at below the MCL
5000499	Ratto Brothers	NTNC	100	46.6	No	1/1/09	Y	Yes	All subsequent monitoring noted at below the MCL, Pre-application submitted
5000574	Eastin	NTNC	26	55.5	No	12/29/08	Y	No	Violation Notice/Reminder Letter-Phone Call; On-going PN

Table 3: Uranium (MCL=20pCi) based on RAA; Health Effects: Chronic

Uranium is found as a result of erosion of natural deposits. Some people who drink water containing uranium in excess of the MCL over many years may have kidney problems or an increased risk of getting cancer.

System No.	System Name	PWS Class	Population Served	Contaminant	MCL Violation	Treatment Provided	MCL Level	Date of Last Enforcement Action	PN	Comments
5000109	Ceres Unified/Westport School	NTNC	100	Uranium	53.2 pCi/L	Yes	20 pCi/L	9/12/08	Yes	Uranium pre-treatment received/approved
5000255	Mountain View School	NTNC	364	Uranium	39.7 pCi/L	No	20 pCi/L	6/16/08	Yes	New well placed on-line in 9/2010
5000470	Hughson Nut Company	NTNC	120	Uranium	24.48 pCi/L	No	20 pCi/L	3/19/09	Yes	Well disconnected from domestic supply in 9/2010

System No. = water system number	NTNC = nontransient noncommunity water system	PN = public notification
PWS = public water supply	TNC = transient noncommunity	Bottle Water = the water system providing bottle water
CWS = community water system	MCL = maximum contaminant level	SWTR = Surface Water Treatment Rule
RAA = Running Annual Average	TT = Treatment Technique	LT1 = Long Term 1 Enhanced Surface Water Treatment Rule

Table 4: Arsenic (MCL = 10 ppb) based on RAA; Health Effects: Chronic

Arsenic is found as a result of erosion of natural deposits; runoff from orchards; mining; glass and electronics production wastes. 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.

System No.	System Name	PWS Class	Population Served	MCL Violation	Treatment Provided	MCL Level	Date of Last Enforcement Action	PN	Comments
5000033	Coble's Corner	CWS	50	.014mg/L	No	.010mg/L	3/19/10	Yes	Compliance Order DER-10CO-003 issued on 3/19/10, quarterly monitoring, on-going public notification, Pre-Application submitted
5000051	Mobile Plaza Park	CWS	125	.014mg/L	No	.010mg/L	9/21/10	Yes	Compliance Order DER-10CO-008 issued on 9/21/10, quarterly monitoring, on-going public notification
5000077	Ceres West MHP	CWS	161	.019mg/L	No	.010mg/L	9/30/09	Yes	Notice of Violation (NOV) issued 11/9/07, quarterly monitoring, on-going public notification
5000080	Country Western MHP	CWS	120	.022mg/L	No	.010mg/L	9/30/09	Yes	Compliance Order DER-10CO-004 issued 3/19/10, quarterly monitoring, on-going public notification, contracted with WHF for arsenic treatment
5000085	Green Run Mobile Estates	CWS	100	.014mg/L	No	.010mg/L	3/19/09	Yes	Compliance Order DER-10CO-002 issued 3/19/10, quarterly monitoring, on-going public notification, Pre-Application submitted
5000086	Countryside Mobile Home Estates	CWS	60	.013mg/L	No	.010mg/L	8/27/09	Yes	Notice of Violation (NOV) issued 8/27/09, quarterly monitoring, on-going public notification
5000195	Swanson Farms	NTNC	25	.012mg/L	No	.010mg/L	8/28/09	Yes	Notice of Violation (NOV) issued 8/28/09, quarterly monitoring, on-going public notification, contracted with GRD Engineering for arsenic treatment
5000218	Country Villa Apts.	CWS	30	.017mg/L	No	.010mg/L	8/27/09	Yes	Notice of Violation (NOV) issued 8/27/09, quarterly monitoring, on-going public notification, Pre-Application submitted
5000273	Gratton School	NTNC	110	.014mg/L	No	.010mg/L	8/21/09	Yes	Notice of Violation (NOV) issued 8/21/09, quarterly monitoring, on-going public notification, Pre-Application to be submitted
5000308	B&H Manufacturing	NTNC	90	.012mg/L	No	.010mg/L	9/23/10	Yes	Compliance Order DER-10CO-009 issued on 9/23/10, quarterly monitoring, on-going public notification
5000389	Monterey Park Tract CSD	CWS	186	.035mg/L	No	.010mg/L	8/28/09	Yes	Compliance Order DER-10CO-007 issued 9/2/10, quarterly monitoring, on-going public notification, Feasibility study in progress
5000465	Duarte Nursery-Lab	NTNC	75	.018mg/L	No	.010mg/L	8/26/09	Yes	Notice of Violation (NOV) issued 8/26/09, quarterly monitoring, on-going public notification, technical report submitted
5000465	Duarte Nursery-Nursery	NTNC	75	.018mg/L	No	.010mg/L	8/26/09	Yes	Notice of Violation (NOV) issued 8/26/09, quarterly monitoring, on-going public notification, technical report submitted
5000484	United Pallet	NTNC	45	.015mg/L	No	.010mg/L	8/26/09	Yes	Notice of Violation (NOV) issued 8/26/09, quarterly monitoring, on-going public notification, technical report submitted

System No. = water system number	NTNC = nontransient noncommunity water system	PN = public notification
PWS = public water supply	TNC = transient noncommunity	Bottle Water = the water system providing bottle water
CWS = community water system	MCL = maximum contaminant level	SWTR = Surface Water Treatment Rule
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Table 4: Arsenic (MCL = 10 ppb) based on RAA; Health Effects: Chronic

Arsenic is found as a result of erosion of natural deposits; runoff from orchards; mining; glass and electronics production wastes. 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.

5000553	Foster Farms	NTNC	25	.014mg/L	No	.010mg/L	8/28/09	Yes	Notice of Violation (NOV) issued 8/28/09, quarterly monitoring, on-going public notification, plans to connect to Turlock by Dec. 2010
5000555	Piranha Produce	NTNC	26	.012mg/L	No	.010mg/L	8/21/09	Yes	Notice of Violation (NOV) issued 8/21/09, quarterly monitoring, on-going public notification
5000570	Valley Peterbilt	NTNC	25	.012mg/L	No	.010mg/L	9/21/10	Yes	Compliance Order DER-10CO-006 issued on 9/21/10, quarterly monitoring, on-going public notification

Table 5: Surface Water Treatment Plants

PWS with a surface water source are required to have a multi-barrier treatment process that includes filtration and disinfection to assure the removal and or the inactivation of disease causing viruses, bacteria, and protozoa. The Surface Water Treatment Rule (SWTR) and or the Long Term 1 Enhanced Surface Water Treatment Rule (LT1ESWTR) established standards for approved filtration methods to assure that these pathogens are reliably removed by the filtration process.

System No.	System Name	PWS Class	Population Served	Treatment Technique Violations			Date of Last Enforcement Action	PN	Comments
				Filtration Method Compliant	Turbidity Standard Violations	CT Inactivation Violations			
5000243	Frank Raines Park	TNCWS	26				1/5/07		Compliance order (CO) issued 1/5/07 (CO No. 03-10-07-001). Draft plans submitted to CDPH for ultrafiltration membrane treatment. CO expires September 2011.

System No. = water system number	NTNC = nontransient noncommunity water system	PN = public notification
PWS = public water supply	TNC = transient noncommunity	Bottle Water = the water system providing bottle water
CWS = community water system	MCL = maximum contaminant level	SWTR = Surface Water Treatment Rule
RAA = Running Annual Average	TT = Treatment Technique	LT1 = Long Term 1 Enhanced Surface Water Treatment Rule

RECOMMENDATIONS

CDPH finds that the Stanislaus County program is making an effort to achieve general compliance with CDPH's Local Primacy Program (LPA) requirements for small water systems. The Stanislaus County LPA continues to make progress in meeting the goals and objectives established in the FY 09/10 Workplan. CDPH makes the following recommendations regarding the County's program:

1. Continue the practice of the LPA staff conducting a site inspection of small water systems that have failed the Total Coliform Rule MCL, when the cause of the contamination cannot be easily determined by the system operator. In addition, continue to provide guidance on corrective mitigation measures, follow-up monitoring, and public notification requirements to the system operator.
2. Continue to carefully document actions taken and corrective actions required following the investigation of persistent bacteriological maximum contaminant level violations.
3. Continue to develop or update technical report and sample site plan information during inspections.
4. Reissue a permit whenever the original permit does not adequately describe the current system. Section 116525 (c) of the CHSC grants the LPA authority to renew, reissue, revise, or amend any domestic water supply permit whenever the LPA deems it to be necessary for the protection of public health whether or not an application has been filed.
5. Continue to implement the procedures prescribed in the "Guidelines to Timely and Appropriate Action for Public Water System Violations" (Guidelines) as referenced in the Delegation Agreement.
6. Continue to provide copies of all enforcement actions, permits and accompanying technical reports and TMF reports to the Stockton District Office.
7. Continue to EDT (Electronic Data Transfer) to CDPH monthly data updates to the facility information, permits, sources, treatment, inspections, violations, enforcement actions, as well as association of violation enforcement actions.
8. Lead staff in the SWSP must have detailed knowledge of all aspects of small water systems as well as the laws and regulations governing public water systems. Therefore, it is important that Stanislaus County Department of Environmental Resources continues to allocate the resources to recruit, develop, retain, promote, and support staff to assure an able, knowledgeable, and motivated workforce is available to fill future vacancies in the SWSP.

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County of Stanislaus
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Report Submitted by:

Carl L. Carlucci, P.E.
Supervising Sanitary Engineer
Central California Section
Southern California Branch
Drinking Water Field Operations

Date:

October 19, 2010

Appendices:

Appendix A – LPA Permit Activities with Attachment A
Appendix B – LPA Surveillance Activities with Attachment B
Appendix C – LPA Monitoring Activities
Appendix D – LPA Reporting Activities
Appendix E – LPA Enforcement Activities with Attachment E
Appendix F – LPA Management Activities

Appendix A
LPA Permits Activities
Per 22-CCR, Sec. 64254

The County has been issuing a Domestic Water Supply Permit in conformance with CDPH's *Permit Policy and Procedures Manual*, which includes a standardized format for the permit and the accompanying technical report. Section 116525 (c) of the CHSC grants the LPA the authority to renew, reissue, amend, any domestic water supply permit whenever it deems necessary for the protection of public health whether or not an application has been filed. The LPA primacy regulations require that all permits be re-evaluated at least once every 10 years to confirm that they are current and contain conditions appropriate to insure the safe operation of the system. During FY 09/10, the County issued 6 permits to small water systems as summarized in Table 1 below. Five more permits remain to be issued.

Table 1: FY 09/10 Permit Information

Type of Permit Issued (other than the annual permit)	No. Completed
New Public Water System	3
Change of Ownership	1
Change in Source or Treatment	2
Other	
Totals	6

Attachment A contains tables of the water systems providing treatment to meet a primary a drinking water standard (7 water systems), providing continuous chlorination (13 water systems), or providing treatment of a surface water source (2 water systems) in FY 09/10. The Frank Raines Park OHV is listed in the table as being a water system with surface water treatment. This water system has a well that was determined to be ground water under the direct influence of surface water (GWUDI) and as such is subject to the SWTR.

Attachment A

**Water Systems Providing Treatment
 to Meet a Primary MCL (Chemical Removal Treatment)**

System No.	System Name	PWS Class	Population Served	MCL Violation	Type of Treatment Provided	Date of Permit Approving Treatment
5000067	Tully Mobile Estates	CWS	40	DBCP	Organic Removal – GAC ¹	6/29/07
5000109	Ceres Unified/Westport	NTNC	100	Nitrates, Arsenic	Ion Exchange	9/12/05
5000116	Roselawn High School	NTNC	223	Nitrates	Ion Exchange	2/8/02
5000193	Patterson Vegetable Co.	NTNC	850	PCE	Ion Exchange	5/20/93
5000286	Bronco Winery	NTNC	200	DBCP, Nitrates	Ion Exchange/Reverse Osmosis	2/1/93
5000411	United Rentals	NTNC	130	DBCP	Organic Removal – GAC	5/9/94
5000473	Excell Center	NTNC	25	DBCP	Organic Removal –GAC	5/20/93

¹Granular Activated Carbon

Water Systems Subject to the Surface Water Treatment Rule

System No.	System Name	PWS Class	Population Served	Filtration Method	Permit	Date of Permit Approving Treatment
5000008	Knights Ferry CSD	CWS	85	Conventional	Yes	5/19/93
5000010	TID/La Grange Water System	CWS	120	Alternative	Yes	8/1/06
5000243	Frank Raines Park OHV	NCWS	26	Ultrafiltration Membrane	No	Draft under review

Water Systems with Continuous Chlorination							
System No.	System Name	PWS Class	Population Served	Type of Treatment Provided	Date of Permit Approving Treatment	Current Grade of On-site Treatment Operator	Comments
5000008	Knights Ferry CSD	CWS	85	SWTR	5/19/93	T2	SWTR
5000010	TID/La Grange	CWS	120	SWTR	8/1/06	D2, T2	SWTR
5000019	Riverdale Park Tract CSD	CWS	300	Chlorination	Pending	D2, T2	Prophylactic disinfection
5000109	Ceres Unified/ Westport School	NTNC	100	Chlorination	9/12/05	D1, T2	In conjunction with nitrate treatment
5000116	Roselawn High School	NTNC	223	Chlorination	2/8/02	D2, T2	In conjunction with nitrate treatment
5000133	Hart Ransom School	NTNC	650	Chlorination	5/19/93	D1	Prophylactic disinfection
5000179	Sconza Candy Co	NTNC	650	Chlorination	3/2/93	D1	Prophylactic disinfection
5000193	Patterson Vegetable Company	NTNC	850	Chlorination	5/20/93	D1	Prophylactic disinfection
5000243	Frank Raines Park OHV	TNC	26	Chlorination	Pending	D2	SWTR
5000286	Bronco Winery	NTNC	200	Chlorination	2/1/93	T2	In conjunction with nitrate treatment
5000408	Westley CSD	CWS	70	Chlorination	5/17/93	D1	Purchased water from Hillview Homes
5000427	Covanta Stanislaus Waste Energy	NTNC	25	Chlorination	8/15/01	D3, T5	In conjunction with TDS/EC treatment
5000481	Foster Farms - Ellenwood	NTNC	40	Chlorination	12/15/93	T1	Prophylactic disinfection

Appendix B
LPA Surveillance Activities
Per 22-CCR, Sec. 64255

Inventory

During FY 09/10, the County regulated 182 active public water systems (PWSs). Table 1 below summarizes the PWSs that were reclassified, and those PWS that were added to the inventory or removed from the inventory of active PWSs regulated by the Stanislaus County LPA. Attachment B is a list of the 182 active SWSs in the County, their system type, population and number of connections served.

Three water systems serving food facilities were was reclassified to TNCs and added to the inventory. The Tony Morris/Morris Dairy, a CWS, reconfigured the distribution system to create two state small water systems (two separate distribution systems each with a source) so it no longer served 25 or more year long residents. This system was reclassified into two state small water systems and was removed from the active inventory of PWSs. The Grizzly Rock Café had been reactivated but because of an error of omission it had not been added to the County's database, however, there was active file for this water system. The Fisher Nut Company was a recently discovered PWS that was added to the inventory as a TNC.

Table 1: Water Systems Change in Status or Classification in FY 09/10

System Number	System Name	Old Classification	New Classification	Activations / Inactivation	Date of change	Inactivation Reason
5000254	Rising Sun School	NTNC		Inactivate	8/19/09	School closed
5000365	Las Palmas Fishing Access	TNC		Inactivate	8/19/09	Restrooms closed
5000383	Dick's Bar and Grill	FC II	TNC	Activate	8/25/09	
5000400	Grizzly Rock Cafe		TNC	Activate	11/21/07	
5000404	Wood Colony Brethren	NTNC		Inactivate	7/20/09	School closed
5000434	Ceres Sports Arena	FC II	TNC	Activate	9/30/09	
5000505	Country Store	FC I	TNC	Activate	6/18/08	
5000559	Tony Morris/Morris Dairy	CWS	SS	Inactivate	7/15/09	Lowered the #of connections
5000584	Mesa Elementary School	New	NTNC	Activate	1/8/10	
5000585	Fisher Nut Company	New	TNC	Activate	6/9/10	

The classifications of the 182 small systems in the current inventory are shown in Table 2 below. An inventory is maintained for all public water systems regulated by the County. The information maintained is that which is required by the Primacy Delegation Agreement including: system location, address, and contact information; permit status; source type, location, status, and treatment; inspection dates; violations and enforcement actions taken. A review of the County's water systems files reveal that the files were well organized, using classification folders to help separate and organize the information. Copies of the Bacteriological Sample Siting Plan, proof of public notification (when required), sanitary surveys, permits with technical report, inspections and water quality monitoring data and routine correspondence were in the files.

Table 2: FY 09/10 Inventory Information

System Type	Number
Community	44
Nontransient-Noncommunity	58
Transient-Noncommunity	80
Total	182

The water system in Table 3 changed ownership during the FY 09/10.

Table 3: Systems That Have Changed Ownership in FY 09/10

System Number	System Name	Permit Date	Water System Type
5000110	Fee Water System		TNC

The County has two surface water systems and one system with a GWUDI source. The GWUDI system, Frank Raines Park OHV, has limited use of the source to irrigation only (no domestic use) in FY 09/10. The Frank Raines system is under a Compliance Order to provide treatment. Plans for an ultrafiltration membrane treatment system are currently under review.

Inspections/Sanitary Survey

Oversight for the SWSP is conducted by Program Manager, Janis Mein, with the LPA. The water program had two full time persons assigned as the lead or small water system program specialist (SWSPS), but as of February 1, 2010, that number was reduced to one full time person. In addition to the Program Manager and 1 SWSPS, there are 3 other field staff and one administrative secretary working in the water program. The County is divided geographically into five districts, and Registered Environmental Health Specialists (REHS) are assigned to do all LPA program work in a respective district. The administrative secretary assists with much of the data entry and file maintenance. In addition to the drinking water program, 3 LPA staff have oversight of the state small water systems, retail food program, recreational health (public pools and spas), private well and occasional septic systems inspections.

All public water systems must have sanitary surveys completed at least once every five years. A sanitary survey consists of a survey of water system:

- 1) source(s),
- 2) treatment,
- 3) distribution system,
- 4) finished water storage,
- 5) pumps, pump facilities, and controls;
- 6) monitoring, reporting, and data verification,
- 7) system management and operation, and
- 8) operator compliance with State requirements.

The County utilizes an official notice form for documenting the inspection findings. Inspection procedures include a pre-inspection file review, review of chemical monitoring status and generation of a current monitoring schedule for each system source, inspection of all water system physical facilities, review of system operation, and documentation of system deficiencies. The completed official notice form is left with the water system representative with an updated monitoring schedule. Table 4 below summarizes the routine inspections of public water systems conducted in FY 09/10 by the County and the frequency specified in the FY 09/10 workplan:

Table 4: FY 09/10 Inspections

Type of System	FY 09/10 Workplan Inspection Frequency (LPA delegation minimum)	Number of SWS's²	No. Inspections Projected¹ (LPA delegation minimum)	No. Inspections Completed²
SWSs using surface water or groundwater under the direct influence	Once every 2 years	3	2	1
SWSs using groundwater which must be treated to meet a primary standard	Once every 2 years	7	5	2
CWS and NTNCWS using groundwater without treatment	Once every 5 years	93	17	17
TNCWS using groundwater without treatment	Once every 5 years	79	14	18
Totals	---		38	38

During FY 09/10, routine inspections were completed on 38 public water systems, as shown in Table 4. The total number of inspections completed in FY 09/10 represents 21% of the County's inventory of SWSs and 100% of the projected inspections in the County's FY 09/10 workplan.

Attachment B: Inventory of Stanislaus County Public Water Systems

Community Water Systems		Population	Connections
5000082	4N MOBILEHOME PARK	165	35
5000086	COUNTRYSIDE MOBILEHOME ESTATES - ADULT PARK	60	44
5000090	PINEWOOD MEADOWS MHP	500	176
5000092	OID #49 - GILBERT	37	12
5000095	SUNRISE VILLAGE MHP	339	103
5000099	DEL RIO EAST HOA WATER SYSTEM	110	55
5000167	STAN CNTY HONOR FARM WS/LAIRD PARK	300	7
5000408	WESTLEY CSD	70	35
5000016	OID #41 - MOUNTAIN VIEW	147	42
5000067	TULLY MOBILE ESTATES	40	15
5000217	FAITH HOME TEEN RANCH	26	1
5000237	NORTH OAKS MUTUAL WATER CO	183	61
5000008	KNIGHTS FERRY COMM. SVC. DIST.	85	62
5000010	TID/ LA GRANGE WATER SYSTEM	120	77
5000013	OID #45 - LOUIS MEYER	129	37
5000014	OID #46 - SUNSET OAKS	269	77
5000015	OID #22 - WILLIAMS TRACT	150	53
5000017	PARK HEIGHTS MUTUAL WATER CO	250	95
5000019	RIVERDALE PARK TRACT CSD	300	137
5000033	COBLES CORNER	50	20
5000048	LAZY B MOBILEHOME PARK	125	49
5000049	LONE PINE MOBILEHOME PARK	64	32
5000051	MOBILE PLAZA PARK	125	50
5000054	MORNINGSIDE MOBILEHOME PARK	67	49
5000055	OLIVE LANE MOBILEHOME PARK	153	51
5000057	PATIO VILLAGE MOBILEHOME PARK	75	49
5000058	FISHERMAN'S BEND MHP (water system)	80	87
5000061	MARTIN'S MOBILE HOME COURT	60	20
5000066	MODESTO MOBILE HOME PARK, LLC	200	150
5000071	TWIN CYPRESS MOBILEHOME PARK	112	45
5000072	MULBERRY MHP	49	42
5000077	CERES WEST MHP	161	46
5000080	COUNTRY WESTERN MOBILE HOME PARK	120	60
5000085	GREEN RUN MOBILE ESTATES	100	46
5000060	CASA DE AMIGAS MOBILE HOME PARK	220	73
5000218	COUNTRY VILLA APTS	30	23
5000005	CROWS LANDING COMM SVC DISTRICT	500	138
5000389	MONTEREY PARK TRACT CSD	186	50
5000263	OASIS INVESTMENTS	75	31
5000271	BUEHNER WATER SYSTEM - WEBER COMPLEX	100	35
5000297	BUEHNER HOUSES	25	13
5000313	BUEHNER WATER SYSTEM	150	50
5000317	OID #51 - SUNSET OAKS #10	287	82
5000579	FOSTER FARMS #5	26	10
Total # Community Water Systems			44

Nontransient Noncommunity Water Systems		Population	Connections
5000548	MONTPELIER ORCHARDS (WATER)	25	2
5000552	KIERNAN BUSINESS CENTER	120	1
5000553	FOSTER FARMS-WEST MAIN FEEDMILL	25	5
5000554	HUGHSON NUT #2	25	3
5000555	PIRANHA PRODUCE	26	2
5000563	ELKS LODGE 1282	25	1
5000101	CHATOM SCHOOL (EH)	500	6
5000109	CERES UNIFIED/WESTPORT SCHOOL	100	1
5000117	LAKWOOD MEMORIAL PARK & FUNERAL HOME	26	5
5000133	HART- RANSOM UNION SCHOOL & DISTRICT	650	9
5000141	LIBITZKY PROPERTY MANAGEMENT CORP.	125	15
5000155	ROBERTS FERRY SCHOOL CAFETERIA	100	2
5000179	SCONZA CANDY COMPANY	650	1
5000189	NMIP FIRE & WATER SYSTEM, LLC	300	24
5000193	PATTERSON VEGETABLE COMPANY	850	4
5000202	JOE'S TRAVEL PLAZA (EH)	26	4
5000411	UNITED RENTALS	130	15
5000427	COVANTA STANISLAUS WASTE ENERGY FACILITY	25	6
5000440	RAINBOW FARMS	30	7
5000442	VALLEY DISTRIBUTORS, INC.	50	1
5000454	PURINA MILLS INC	25	1
5000465	DUARTE NURSERY INC WATER SYSTEM	75	7
5000470	HUGHSON NUT COMPANY WATER SYSTEM	120	1
5000474	STRATOS WAY WATER SYSTEM	135	5
5000478	VSP PRODUCTS, INC	30	5
5000481	FOSTER FARMS-ELLENWOOD HATCHERY	40	2
5000498	PATCHETTS FORD MERCURY	35	1
5000499	RATTO BROS	100	2
5000517	KIERNAN/MCHENRY WATER COMPANY, INC	25	2
5000116	ROSELAWN HIGH SCHOOL	223	5
5000132	VALLEY HOME SCHOOL TEXAS	26	1
5000195	SWANSON FARMS	25	1
5000255	MOUNTAIN VIEW ELEMENTARY SCHOOL	364	8
5000372	STORER TRANSPORTATION	40	5
5000473	EXCELL CENTER	25	3
5000484	UNITED PALLET WATER SYSTEM	45	5
5000494	HYPOWER HYDRAULICS	30	1
5000384	A & M INDUSTRIES	142	25
5000527	CALIFORNIA NUT COMPANY	30	2
5000529	SUNRISE ROCK & REDI-MIX	25	1
5000530	FRAZIER NUT FARMS, INC.	40	7
5000249	STANISLAUS UNION SCHOOL & DISTRICT LOCATION	39	1
5000273	GRATTON SCHOOL	110	2
5000274	PARADISE SCHOOL	152	2
5000277	VALLEY HOME SCHOOL PIONEER	26	1
5000286	BRONCO WINERY	200	6
5000295	SHILOH SCHOOL DISTRICT	105	7
5000308	B & H MANUFACTURING	90	1
5000335	BRETHREN HERITAGE SCHOOL, INC	25	2
5000358	DAIRY FARMERS OF AMERICA	75	1
5000391	SUPERIOR DISTRIBUTION CENTER	45	2
5000570	VALLEY PETERBILT	25	2
5000573	5033 PENTECOST	302	2
5000574	EASTIN	26	10
5000580	GROVER LANDSCAPE WATER SYSTEM	26	2
5000581	PIONEER EQUINE HOSPITAL WATER SYSTEM	25	1
5000568	GREGORI HIGH SCHOOL	1	25
5000584	MESA ELEMENTARY SCHOOL	5	860
Total # of Nontransient Noncommunity Water Systems			58

Transient Noncommunity Water Systems		Population	Connections
5000547	KEYES 76 (WATER SYSTEM)	25	2
5000551	BEL PASSI BASEBALL	25	1
5000561	MC HENRY GOLF CENTER WATER SYSTEM	25	1
5000562	LOS INDIOS/BRUNO WATER SYSTEM	25	4
5000136	LOG CABIN WATER SYSTEM	26	1
5000138	EL RINCON & YOSEMITE HACIENDA MARKET	25	2
5000152	ANTONIO'S BAR & GRILL	26	1
5000158	FILBIN LAND & CATTLE CO	26	2
5000164	MODESTO RESERVOIR	25	1
5000175	SHIVELY'S BAR & GRILL	26	1
5000213	HAMLET MOTEL	26	15
5000238	SUN DRY PRODUCTS-WATER	26	4
5000239	LA GRANGE PARK-OHV	26	3
5000395	BASSO BRIDGE FISHING/BOATING ACCESS	26	2
5000402	OUR LADY OF ASSUMPTION CHURCH	26	1
5000426	LIBERTY BAPTIST CHURCH	65	2
5000439	GOLDEN ARCO	26	1
5000443	TRIANGLE TRUCK STOP	25	2
5000446	WHISKEY RIVER SALOON	26	2
5000447	RIVER ROAD PLAZA WATER SYSTEM	25	6
5000480	NEW HOPE CHURCH OF THE NAZARENE	70	1
5000482	CHEMURGIC AGRICULTURAL CHEMICALS, INC.	25	7
5000487	J & J FARM FRESH PRODUCE & BAKERY	25	1
5000490	MOUNTAIN VIEW CHATOM RECREATION	25	4
5000493	JEHOVAH'S WITNESS SIERRA VISTA CONG	500	3
5000497	ALL AMERICAN PRODUCE/WATER SYSTEM	25	1
5000500	KINGDOM HALL JEHOVAH WITNESS	100	1
5000502	RESENDIZ FRUIT BARN	25	4
5000503	OAKDALE CHEESE & SPECIALTIES	25	1
5000505	COUNTRY STORE WATER SYSTEM	25	2
5000507	GURUDWARA GURU NANAK SAHIB	109	1
5000512	SIKH TEMPLE MODESTO-CERES	97	2
5000516	LIVING FAITH COMMUNITY CHURCH	25	6
5000165	WOODWARD RESERVOIR WATER SYSTEM	26	1
5000177	SHADY LAWN FARM (SUMMER CAMP)	150	4
5000243	FRANK RAINES PARK OHV	26	2
5000298	ORANGE BLOSSOM RECREATION AREA	26	7
5000332	VFW POST 5059 WATER SYSTEM	26	2
5000401	KNIGHTS FERRY RECREATION AREA	26	1
5000501	RIVER OAKS/KINGDOM HALL	300	1
5000041	MAZE BLVD MOBILEHOME PARK	90	40
5000076	CATFISH CAMP	24	19
5000486	ROBERTS FERRY NUT COMPANY	25	3
5000409	SHILOH-PARADISE BASEBALL FOR YOUTH	26	1
5000509	BURCHELL NURSERY	25	5
5000414	FULL GOSPEL ASSEMBLY	25	6
5000525	OASIS MARKET	25	1
5000483	RIVER OAK GRACE-WATER SYSTEM	500	4
5000166	FOX GROVE FISHING ACCESS	26	1
5000462	BEST WESTERN-ORCHARD INN	26	1
5000091	OAKDALE GOLF & COUNTRY CLUB (EH)	25	2
5000110	FEE-BESONE (SCENIC DRIVE-IN) WATER SYSTEM	25	12
5000129	EL REMATITO MARKETPLACE	100	1
5000467	RAM NAAM MANDALI CHURCH OF MODESTO	250	1
5000154	THE FRUIT YARD RESTAURANT	75	4
5000307	KINGDOM HALL JEHOVAH WITNESS #1923	26	1
5000532	GRACE COMMUNITY CHRISTIAN CHURCH	160	2
5000536	SHELTON WATER SYSTEM	25	1
5000538	MODESTO CHRISTIAN CENTER (WATERSYSTEM)	25	1
5000258	FARMER'S CATFISH HOUSE	26	1
5000261	EMPIRE SPORTSMEN'S WS/ CASINO ROYALE	26	1
5000272	CITY OF OAKDALE -KERR PARK	26	4
5000284	RAINBOW FIELDS	25	1

Transient Noncommunity Water Systems		Population	Connections
5000290	SMART STOP FOOD MART (EH)	26	1
5000323	ALMOND TREE	26	2
5000346	NINO'S PLACE WATER SYSTEM	25	1
5000347	BECKLEY LYONS WATER SYSTEM	26	1
5000368	MABLE AVE BAPTIST CHURCH	50	1
5000382	FARMERS' DEN /MARKET	26	2
5000388	CARDOZA WATER SYSTEM	26	9
5000571	WATERFORD SPORTSMEN'S CLUB	25	40
5000577	ASHWANI SHARMA	25	2
5000578	TURLOCK SPORTSMAN'S CLUB	26	3
5000582	JOE'S FOOD MART WATER SYSTEM	26	1
5000583	SALIDA HULLING ASSOCIATION WATER SYSTEM	25	3
5000434	CERES SPORTS ARENA	25	4
5000383	DICK'S BAR AND GRILL	26	1
5000585	FISHER NUT COMPANY	25	2
5000400	GRIZZLY ROCK CAFÉ	199	26
5000386	MARTY'S INN WATER SYSTEM	25	1
Total # of Transient Noncommunity Water Systems		80	

Appendix C
LPA Monitoring Activities
Per 22-CCR, Sec. 64256

Bacteriological Monitoring

All of the County SWSs have a Bacteriological Sample Siting Plan on file. The format developed by the County is standardized and must be completed by the water system operator. Updates of the Bacteriological Sample Siting Plans are required by County Staff when systems are changing ownership or when the plan has been determined by County Staff to be outdated.

When a small water system has been determined to have failed the Total Coliform Rule MCL, County staff may conduct a site inspection of the system, if the cause of the contamination cannot be easily determined by the system operator. If County staff are able to determine the cause of the problem, they provide guidance on corrective mitigation measures, follow-up monitoring, and public notification requirements to the system operator. The system is then responsible for implementation of the mitigation measures. In all cases where repeat samples are required, the County is also requiring the collection of 5 routine samples the following month, in accordance with requirements of the Total Coliform Rule. Furthermore, the County has required water systems to conduct coliform monitoring of all groundwater sources in production when a routine sample from the distribution system is positive for total coliform or *E. coli*. This monitoring practice is consistent with the bacteriological monitoring requirements of the source as required by the federal Ground Water Rule (GWR) following a total coliform positive routine sample from the distribution system. In the Annual News Letter to the SWSs the LPA reinforced the need to conduct source monitoring by including the source monitoring requirements of the federal GWR in this news letter.

In instances where a ground water source has been demonstrated to be subject to surface water contamination (or fecal contamination), the LPA orders the water system to implement corrective action, including, but not limited to, one of the following:

- 1) Develop a new ground water source;
- 2) Consolidate with another PWS;
- 3) Provide surface water treatment to the effected groundwater supply.

Wells subject to fecal contamination, which are no longer used are usually destroyed by filling with concrete from the bottom up to eliminate conduits and to prevent further contamination of the ground water.

Chemical/Radiological Water Quality Monitoring

The County notifies the SWSs of their monitoring and reporting requirements by providing a monitoring schedule to the system operator in an annual mailing, during inspections and issuance of new or amended permits, or it is provided upon request. Chemical data submitted by the SWSs are received and reviewed by the program specialist. The specialist ensures compliance with MCLs and monitoring and reporting requirements, and advises the SWSs of any follow-up sampling requirements. The County grants monitoring waivers for specific synthetic organic chemicals (SOCs) and for a reduction in the volatile organic chemical (VOC) monitoring requirement. Hard copies of all chemical monitoring results are maintained in the water system files.

Systems Providing Surface Water Treatment Plants Monthly Reports

PWS with a surface water source are required to have a multi-barrier treatment process that includes filtration and disinfection (typically chlorination) to assure the removal and or the inactivation of disease causing viruses, bacteria, and protozoa. During FY 09/10, there were 2 SWSs with surface water treatment plants. Attachment A and Attachment C have tables that list the SWSs with surface water treatment, the filtration technique utilized by the water system, the turbidity performance standard that filtered water must not exceed for the filtration technique and information on the water systems compliance with various SWTR requirements. All water systems providing treatment are required to have an approved operation plan.

The Surface Water Treatment Rule (SWTR) requires monthly reporting of turbidity readings and daily CT values (disinfectant concentration x contact time) achieved whenever a surface water treatment plant is in operation. CDPH has provided the Stanislaus County LPA with electronic reporting forms to provide to the water systems with surface water treatment for the monthly reporting, the reporting of turbidity readings, and daily CT determination. CDPH has requested that all the SWSs with surface water treatment use these forms for the required reporting. The LPA has provided these forms to the SWSs with surface water treatment and directed them to use these forms for the required reporting.

The three water systems using surface water submitted their plans for monitoring raw water for *E. coli* densities (MPN/100 mL) every other week for one year as required by the Long Term 2 Enhanced Surface Water Treatment Rule (LT2). All three of the water systems completed the raw water *E. coli* monitoring with all the averages of *E. coli* being less than 50 MPN/100 mL. These SWSs with surface water treatment were assigned a Bin 1 Classification (no additional monitoring or treatment required).

Disinfection and Disinfection Byproduct (DBP) Rule

The County maintains a database for tracking community and nontransient-noncommunity systems utilizing disinfection for compliance with monitoring requirements of DBP Rule. All community and nontransient-noncommunity surface water systems and groundwater systems that are chlorinating were notified by the County of the requirement to monitor for TTHM and HAA5 annually during the month of warmest water temperature, and the County is currently tracking compliance with this monitoring. The majority of the 13 water systems that are required to monitor for DBPs have conducted the required monitoring. None of these 13 water systems are in violation for the MCL for TTHM (0.080 mg/L) or HAA5 (0.060 mg/L). Attachment C provides tables of the groundwater systems that are chlorinating as well as the surface water systems that are required to provide disinfection.

Lead and Copper Rule

The County maintains a database for tracking compliance of community and nontransient-noncommunity water systems with the monitoring requirements of Lead and Copper Rule (LCR). The LCR requires community and nontransient-noncommunity water systems to monitor lead and copper levels at the consumers' taps. If Action Levels (AL) are exceeded, installation of corrosion control treatment is required. If the action level for lead is exceeded, public education is required. The AL for lead is 0.015 mg/L and the AL for copper is 1.3 mg/L. Compliance with the lead and copper action levels is based on the 90th percentile lead and copper levels. This means that the concentration of lead and copper must be less than or equal to the action level in at least 90% of the samples collected. All 102 water systems that are required to monitor for the LCR have conducted the required monitoring. None of the 102 water systems subject to the LCR have exceeded the AL for lead or copper.

Attachment C

Water Systems Chlorinating Ground Water Sources								
System No.	System Name	PWS Class	Population Served	Chlorination Method	Chlorination Injection Point	4- log Virus Inactivation ¹	Source Bacteriological Monitoring	Treating for Compliance with TCR ²
5000019	Riverdale Park Tract CSD	CWS	300	Chlorination		No	Yes	No
5000109	Ceres Unified/ Westport School	NTNC	100	Chlorination		No	Yes	No
5000116	Roselawn High School	NTNC	223	Chlorination		No	Yes	No
5000193	Patterson Vegetable Company	NTNC	850	Chlorination		No	Yes	No
5000286	Bronco Winery	NTNC	200	Chlorination		No	Yes	No
5000408	Westley CSD	CWS	70	Chlorination		No	Yes	No
5000427	Covanta Stanislaus Waste Energy	NTNC	25	Chlorination		No	Yes	No
5000133	Hart Ransom School	NTNC	650	Chlorination		No	Yes	No
5000179	Sconza Candy Co	NTNC	650	Chlorination		No	Yes	No
5000481	Foster Farms - Ellenwood	NTNC	40	Chlorination		No	Yes	No

1. Beginning in December of 2009 federal law will require a groundwater a source that has been demonstrated that is subject to fecal contamination must provide a CT a minimum of 4-log inactivation of viruses. In these instances CDPH recommends that a new ground water source be developed and the well subject to fecal contamination properly destroyed.
2. Water System has history coliform and fecal coliform positive samples. The water system began chlorinating to eliminate Total Coliform Rule violations.

Water System Subject to the Surface Water Treatment Rule										
System No.	System Name	PWS Class	Filtration Method	Treatment Technique Violations			Operations Plan	Grade Certified Operator	Permit	Emergency Disinfection Plan
				Filtration Method Compliant	Turbidity Standard Violations	CT Inactivation Violations				
5000010	TID/La Grange Water System	CWS	Alternative	Yes	None	None	Yes	T2	Yes	Yes
5000008	Knights Ferry	CWS	Conventional	Yes	None	None	Yes	T2	Yes	Yes
5000243	Frank Raines Park OHV	NCWS	Under Construction	Yes	Yes	Yes				

Appendix D
LPA Reporting Activities
CCR 22, Section 64257

The County has been reporting inventory information electronically (i.e., electronic data transfer or EDT) from its DER database to CDPH's Sacramento Headquarters on a monthly basis. Information regarding violations (MCL, monitoring and reporting), enforcement actions taken, routine inspections and sanitary surveys are entered into the DER database and reported as required to CDPH by EDT. The Stanislaus County LPA has consistently and routinely submitted the monthly reports via EDT as required. Error reports on data submitted electronically are provided to the County from CDPH's Small Water Systems Unit. The Stanislaus County LPA has made all necessary corrections immediately.

Appendix E
LPA Enforcement Activities
CCR 22, Section 64258

Under the terms of the LPA delegation, the County is required to take follow-up action to assure that water quality failures are adequately addressed with the necessary mitigation measures including requiring public notification. The County issues letters, enforcement letters, citations for administrative office hearings, notice of violations, citations, and compliance orders. During FY 09/10, the County issued a total of 44 enforcement actions and 5 compliance orders. Table 8 summarizes the number of compliance orders issued by constituent:

Table 8: Number of Compliance Orders Issued by Constituent

Number of C.O.'s	Constituent
4	Arsenic
1	Nitrate
Total #	5

Continuing Violations

Tables 1 through 5 of the summary of the report list the SWSs with MCL violations. In addition, these tables provide the date of the most recent enforcement action taken, the current status of the mitigation measures taken, and other correction efforts currently under way. The County is tracking compliance with the DBCP, disinfection byproducts (DBP), uranium, arsenic, carbon tetrachloride, and nitrate MCLs. A review of Tables 2 through 7 of the summary of the report and other documents reviewed for the evaluation reveals that 29 SWSs (16% of the 182 in the County) are not in compliance with a primary drinking water standard.

All public water systems with acute chemical contaminants, particularly for nitrate contamination, have been recommended to provide bottled water for drinking as an interim measure until such time as treatment is installed or another potable water source is developed (onsite well or connection to another PWS). Attachment E contains a table of the water systems that are voluntarily providing bottled water.

Intermittent Violations

During FY 09/10, the County also addressed intermittent violations for failure of the total coliform MCL and the nitrate MCL. The County also issued monitoring and reporting enforcement letters for failure to conduct coliform bacteria monitoring in compliance with the Total Coliform Rule and for failure to conduct source water monitoring for nitrate and DBCP. The County staff took appropriate enforcement action by the issuance of an enforcement letter for these violations. Public notification was required for the total coliform MCL and failure to monitor violations.

Certified Treatment and Distribution System Operators

Section (b) of the CHSC states "All persons who are in responsible charge of the water distribution system of a community water system or a nontransient noncommunity water system shall possess a valid and current water distribution operator certificate of the appropriate grade in accordance with the regulations referred to in Section 106910." D-1 Certified Distribution Operators are granted the authority by Section 63770 (d)1 to determine and

control proper chemical dosage rates for wellhead chlorination and distribution residual maintenance. Any other treatment method must be under the supervision of a Certified Water Treatment Operator of the appropriate grade. Each water system has been advised of the classification of the system for certified water treatment or distribution system operator certification.

Consumer Confidence Report

Section 64480 (a) of Title 22 of the CCR requires each community and nontransient noncommunity public water system to issue an annual Consumer Confidence Report to customers. County staff tracks compliance of all SWSs with this requirement. Guidance on the development of the material that must be covered in the CCR is provided on CDPH's website. In FY 09/10, 96% of the water systems complied with the CCR reporting requirements. Attachment E contains a table of those community and nontransient noncommunity that have yet to submit a 2009 CCR.

Attachment E

**Water Systems Providing Bottled Water
 As An Interim Measure to Protect the Health of Users**

System No.	System Name	PWS Class	Population Served	MCL Violation	Date of Permit Approving Bottled Water	Quarterly Proof of Public Notification (Y/N)			Quarterly Proof of Bottled Water Purchase (Y/N)			Annual Report (Y/N)	Status
						Q1	Q2	Q3	Q1	Q2	Q3		
5000255	Mountain View School	NTNC	364	Uranium		Y	N		Y	N		Y	Well has been replaced
5000499	Ratto Bros, Inc	NTNC	100	Nitrates		Y	Y	Y	Y	Y	Y		
5000465	Duarte Nursery	NTNC	75	Arsenic		Y	Y	Y					
5000553	Foster Farms-West Main	NTNC	25	Arsenic		Y			Y				
5000195	Swanson Farms	NTNC	25	Arsenic		Y	Y	Y	Y	Y	Y		

Water System in Violation of Consumer Confidence Reporting Requirements

System No.	System Name	PWS Class	Copy of CCR	Certification of Distribution	Comments
5000090	Pinewood Meadows MHP	CWS	No	No	
5000109	Ceres Unified/Westport School	NTNC	No	No	
5000273	Gratton School	NTNC	No	No	
5000274	Paradise School	NTNC	No	No	
5000454	Purina Mills Inc.	NTNC	No	No	
5000499	Ratto Brothers	NTNC	No	No	
5000563	Elk's Lodge 1282	NTNC	No	No	
5000570	Valley Peterbilt	NTNC	No	No	

Appendix F

LPA Program Management Activities

CCR 22, Section 64259

The ultimate responsibility for management of the County's SWS regulatory program rests with the Director of the Stanislaus County Department of Environmental Resources, Sonya K. Harrigfeld. The County's SWS program is funded through Stanislaus County Ordinance No. C.S. 1036, a risk based fee schedule. There are two incentive programs whereby water system operators have an opportunity for lower fees based on no violations and the use of EDT transmittal of bacteriological sample results.

The County has submitted a Workplan, dated April 30, 2010, for FY 10/11. Section 64260, Title 22 of the CCR requires LPAs to submit proposed annual workplans to CDPH no later than May 1st of each year for the fiscal year commencing July 1 of that year. The workplan outlines the proposed inventory maintenance; permit issuance, surveillance (inspections), surveillance (sampling and monitoring), and reporting and enforcement activities at frequencies in accordance with current State regulation.

TMF Capacity Evaluation Implementation

The 1996 Federal Safe Drinking Water Act (SDWA) amendments specified that new public water systems must have Technical, Managerial, and Financial (TMF) capacity before they are permitted to operate by primacy agencies. A new public water system must demonstrate through its financial resources, technical resources, organizational structure, and personnel that it has the capability to comply with all applicable drinking water standards and regulations on an ongoing basis. As a condition of granting CDPH primacy to conduct the PWS regulatory program in California, the USEPA requires that CDPH have a mechanism in place to prevent the formation of new public water systems that do not have adequate TMF capacity. CDPH has chosen to incorporate the TMF requirements into its permitting process. In addition, under Section 116540(b) of the CHSC, all public water systems that undergo a change of ownership after January 1, 1998, must demonstrate adequate TMF capacity before being granted a new permit. CDPH has developed criteria to be used in assessing the TMF capacity of public water systems.

All LPAs are responsible for ensuring that new public water systems, public water systems undergoing a change of ownership, and DWSRF program applicants have adequate TMF capacity or can acquire it in a specific time period. As such, permits issued by an LPA in all of these cases must contain provisions that require compliance with TMF capacity requirements as applicable. The County has incorporated the TMF capacity requirements into its permit process for new water systems and systems changing ownership.

Drinking Source Water Assessment Program (SWAP)

All existing sources were evaluated for possible contamination during the Source Water Assessment Program, which was completed in December 2002. New sources are required to have assessments completed prior to the issuance of the public water supply permit. Although the County requires that source water assessments be conducted for all new sources, recent loss of trained staff and lack of technical support from UC Davis has resulted in delays in the process, which the County has advised that it will address.

CDPH Infrastructure Financing Programs

Thirty of the County's small public water systems that have submitted pre-applications for funding during the last open period to submit a pre-application. A list of these systems is provided in Attachment F. Many of water

systems that have ongoing MCL violation or treatment technique violations have applied for state funding to bring their system into compliance.

The California Rural Water Association (CRWA) is continuing to provide technical assistance to SWSs in Stanislaus County to complete the DWSRF applications and the mandatory elements of TMF. The CRWA staff in this area is also available to provide technical assistance for completion of TMF capacity criteria for water systems changing ownership or those needing help or training on specific operational issues.

Attachment F
Systems Seeking Project Funding Under
CDPH or Other Infrastructure Funding Programs

Sys ID #	System Name	Project Title and Status
5000389	Monterey Park Tract	25 C 186 10 MONTEREY PARK TRACT 5000389 001 Two community wells exceed nitrate MCL. Either drill new wells or install nitrate 2004 \$900,000
5000243	Frank Raines Park OHV	10 N 26 10 FRANK RAINES PARK OHV 5000243 001 INFILTRATION GALLERY SUBJECT TO Install surface water treatment on existing 2008 \$621,505 COLIFORM CONTAMINATION infiltration pits or replace pits with approved wells = design and construction
5000005	Crows Landing CSD	10 C 500 10 CROWS LANDING COMM 5000005 001 DISTRIBUTION SYSTEM MADE OF OLD, INSTALL NEW DISTRIBUTION LINES. 1999 \$500,000 SVC DISTRICT SMALL DIAMETER STEEL PIPES. OTHER = DESIGN AND CONSTRUCTION
5000090	Pinewood Meadows	C 500 10 PINWOOD MEADOWS 5000090 001 SYSTEM OF SMALL PIPELINES RESULTS UPGRADE DISTRIBUTION PIPING. OTHER = 1998 \$40,000 MHP IN LOW PRESSURES. DESIGN AND CONSTRUCTION
5000164	Modesto Reservoir	15 N 25 10 MODESTO RESERVOIR 5000164 001 SAND IN SYSTEM RE-DEVELOP OR RELOCATE WELL AND 1998 \$35,000 INSTALL FILTERING SYSTEM. OTHER = STUDY, DESIGN AND CONSTRUCTION.
5000101	Chatom School	15 P 500 10 CHATOM SCHOOL (EH) 5000101 001 WATER TANK BADLY CORRODED REPLACE WATER TANK. 1998 \$195,000
5000395	Basso Bridge	10 N 26 10 BASSO BRIDGE 5000395 001 INADEQUATE SUPPLY AND PRESSURE INSTALL LARGER PUMP, ADDITIONAL 1998 \$45,000 FISHING/BOATING ACCESS STORAGE AND PRESSURE SYSTEM. OTHER = DESIGN AND CONSTRUCTION.
5000165	Woodward Reservoir	10 N 26 10 WOODWARD RESERVOIR 5000165 001 ONE OR TWO OF THE FOUR WELLS REPLACE WELL PUMP AND ELECTRICLA 1998 \$35,000 WATER SYSTEM SUBJECT TO COLIFORM COMPONENTS. REPLACE/IMPROVE CONTAMINATION DISTRIBUTION SYSTEM CHLORINATION SYSTEM. OTHER = DESIGN AND CONSTRUCTION
5000239	La Grange Park – OHV	10 N 26 10 LA GRANGE PARK-OHV 5000239 001 INADEQUATE SUPPLY AND OUTDATED REPAIR OR REPLACE SECONDARY 1998 \$25,000 ELECTRICAL SUBMERSIBLE PUMP. INCREASE STORAGE CAPACITY, REPLACE ELECTRICAL SYSTEM. OTHER = DESIGN AND CONSTRUCTION
5000092	OID #49 – Gilbert	10 C 37 10 OID #49 - GILBERT 5000092 001 LIMITED WATER STORAGE RESULTING INSTALL ELECTRICAL GENERATOR. 1998 \$95,000 IN OUTAGES DURING POWER FAILURES. INSTALL NEW HYDROPNEUMATIC TANK. CORRODED HYDROPNEUMATIC TANK. OTHER = DESIGN AND CONSTRUCTION.
5000013	OID #45 – Louis Meyer	10 C 129 10 OID #45 - LOUIS MEYER 5000013 001 LIMITED WATER STORAGE RESULTING INSTALL ELECTRICAL GENERATOR. 1998 \$30,000 IN OUTAGES DURING POWER FAILURES. OTHER = DESIGN AND CONSTRUCTION.
5000016	OID #41 – Mountain View	10 C 147 10 OID #41 - MOUNTAIN VIEW 5000016 001 LIMITED WATER STORAGE RESULTING ININSTALL ELECTRICAL GENERATOR. 1998 \$155,000 IN OUTAGES DURING POWER FAILURES. REPLACE DISTRIBUTION SYSTEM. OTHER DISTRIBUTION SYSTEM FAILING. = DESIGN AND CONSTRUCTION
5000015	OID #22 – Williams	10 C 150 10 OID #22 - WILLIAMS 5000015 002 NEED BACK-UP WATER SOURCE DRILL BACK-UP WELL. OTHER = DESIGN 1999 \$125,000 AND CONSTRUCTION
5000015	OID #22 – Williams	10 C 150 10 OID #22 - WILLIAMS 5000015 001 LIMITED WATER STORAGE RESULTING INSTALL ELECTRICAL GENERATOR. 1998 \$30,000 IN OUTAGES DURING POSER FAILURES. OTHER = DESIGN AND CONSTRUCTION.

Sys ID #	System Name	Project Title and Status
5000355	OID #52 – Deo Gloria	10 C 157 10 OID #52 - DEO GLORIA 5000355 001 LIMITED WATER STORAGE RESULTING INSTALL ELECTRICAL GENERATOR. 1998 \$30,000 IN OUTAGES DURING POWER FAILURES OTHER = DESIGN AND CONSTRUCTION
5000237	North Oaks Mutual	10 C 183 10 NORTH OAKS MUTUAL 5000237 001 NEED SECOND WELL FOR RELIABILITY UPGRADE EXISTING 100 HP AG WELL 1998 \$65,000 WATER CO AND FLEXIBILITY
5000445	OID-Oakdale Rural	10 C 241 OID - OAKDALE RURAL 5000445 001 LIMITED WATER STORAGE RESULTING INSTALL ELECTRICAL GENERATOR. 1998 \$40,000 WATER SYSTEM #2 IN OUTAGES DURING POWER FAILURES. OTHER = DESIGN AND CONSTRUCTION
5000014	OID #46 - Sunset Oaks	10 C 269 10 OID #46 - SUNSET OAKS 5000014 002 LOW PRESSURES IN HIGHER INSTALL BOOSTER STATION. OTHER = 1999 \$40,000 ELEVATIONS. DESIGN AND CONSTRUCTION
5000014	OID #46 - Sunset Oaks	10 C 269 10 OID #46 - SUNSET OAKS 5000014 001 LIMITED WATER STORAGE RESULTING INSTALL ELECTRICAL GENERATOR AND 1998 \$75,000 IN OUTAGES DURING POWER FAILURES. NEW PRESSURE TANK. OTHER = DESIGN PRESSURE TANK FAILING. AND CONSTRUCTION.
5000317	OID #51 - Sunset Oaks	10 C 287 10 OID #51 - SUNSET OAKS 5000317 001 LIMITED WATER STORAGE RESULTING INSTALL ELECTRICAL GENERATOR. 1998 \$40,000 #10 IN OUTAGES DURING PWER FAILURES. OTHER = DESIGN AND CONSTRUCTION.
5000433	OID-Oakdale Rural	10 C 1162 10 OID-OAKDALE RURAL 5000433 001 LIMITED WATER STORAGE RESULTING INSTALL ELECTRICAL GENERATOR. 1998 \$75,000 WATER SYSTEM #1 IN OUTAGES DURING POWER FAILURES. INSTALL PRESSURE TANK. OTHER = PRESSURES FLUCTUATE AS BOOSTER DESIGN AND CONSTRUCTION. PUMP CYCCLES ON AND OFF.
5000099	Del Rio East HOA	0 C 110 10 DEL RIO EAST HOA 5000099 001 BACK-UP WELL IS CONTAMINATED WITH THEY PROPOSE TO DRILL A NEW WELL. 1998 \$75,000 WATER SYSTEM DBCP IN EXCESS OF MCL CITY OF MODESTO HAS PUBLIC WATER ABOUT 1000 TO 2000 FEET FROM THIS SYSTEM. THEY SHOULD CONNECT TO THE MODESTO DEL RIO SYSTEM.
5000066	Modesto MHP	0 C 200 10 MODESTO MOBILE HOME 5000066 001 Back up well does not meet nitrate and Connect to City of Modesto 1999 \$220,000 PARK, LLC DBCP standards.
5000010	TID/La Grange	Recently submitted for ARRA
5000080	Country Western MHP	Recently submitted for ARRA
5000218	Country Villa	Recently submitted for ARRA
5000499	Ratto Bros, Inc	Recently submitted for ARRA
5000335	Brethren Heritage	Recently submitted for ARRA
5000017	Park Heights Mutual	