



RON CHAPMAN, MD, MPH
Director & State Health Officer

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

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June 8, 2012

Board of Supervisors
County of Stanislaus
1010 10th Street
Suite 6700
Modesto, CA 95354

LOCAL PRIMACY AGENCY ANNUAL EVALUATION REPORT

Ladies and Gentlemen:

Enclosed is the "Local Primacy Agency Annual Evaluation Report" for Stanislaus County. The report covers the period from July 1, 2010, through June 30, 2011. 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 Environmental Health Department and the California Department of Public Health.

Based on the evaluation findings, it has been determined that your Environmental Health Department is in compliance with the Department's local primacy program requirements at this time. The Environmental Health Department has met nearly all of the goals and objectives established in the FY 2010-2011 Workplan. As noted in the attached report, the County has failed to submit the required FY 2012-2013 Workplan. Please submit the FY 2012-2013 workplan as soon as possible.

We look forward to working with your Environmental Health Department during this fiscal year. If you have any questions concerning this matter, please contact me at (559) 447-3316 or (209) 948-3816.

Sincerely,

Kassy D. Chauhan, P.E.
Acting Stockton District Engineer
Southern California Branch
Drinking Water Field Operations

Enclosure

cc: Mrs. Wendy Killou – CDPH – Small Water System Unit
Ms. Janis Mein – Stanislaus County Environmental Health Department

KDC/Calaveras LPA Eval Report Ltr FY 10-11.doc

LOCAL PRIMACY AGENCY ANNUAL EVALUATION REPORT
COUNTY OF STANISLAUS
FISCAL YEAR 2011-2012

INTRODUCTION

On October 12, 2011, the California Department of Public Health (CDPH) conducted the annual evaluation of the Stanislaus County Small Water System Program (SWSP) for fiscal year (FY) 2010-2011 (7/1/2010 through 6/30/2011). Stanislaus County Small Water System Program is administrated by the Stanislaus County Department of Environmental Resources and has been delegated as a Local Primacy Agency (LPA). The CDPH representative conducting the evaluation was Wendy Killou, Small Water Systems Unit. Representing the LPA were Janis Mein, Program Manager and John Aud, Senior Environmental Health Specialist.

The evaluation of the Small Water System program is mandated by Section 116330(d) of the California Health and Safety Code (CHSC) to determine the program status with respect to meeting objectives set forth in the Stanislaus County Local Primacy Delegation, FY 2010-2011 workplan, audit compliance with the CDPH's local primacy program requirements, and provide recommendations to the Local Primacy Agency (LPA) on any needed improvements. This report summarizes the CDPH's findings and recommendations regarding the LPA.

SUMMARY OF EVALUATION FINDINGS

Stanislaus County LPA has met the program objectives that were outlined in the approved FY 2010-2011 workplan and made an effort to meet the Local Primacy Program requirements set forth in Sections 64253 through 64260 of Title 22 of the California Code of Regulations (CCR). 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 LPA is making a good effort to ensure compliance with provisions of the SDWA.

Tables A through E list the water systems that had Safe Drinking Water Act water quality violations in FY 2010-2011. 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). A TT is a 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 drinking water standard, possible sources of the contamination, the concentration of the contaminant in the drinking water, the public notification of the consumers by the water system, and enforcement actions taken by the LPA.

Table A: TCR MCL Violations that include a *E. coli* and/or a Fecal Coliform 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.

Listed below are the water systems that had Total Coliform (TC), Fecal Coliform (FC), and/or *E. Coli* (EC) positive (+) water samples that resulted in a violation. An acute coliform violation occurs when there is a positive EC+ or FC+ water sample following a TC+ routine water sample or visa versa in a calendar month.

System Number	System Name	PWS Class	Population Served	Monitoring Frequency	Total # of TCR MCL Violations	PWS on ETT ¹ >= 11 Points	Enforcement Action Taken
5000481	Foster Farms Ellenwood	NTNC	40	Monthly	1	No	MCL, PN, Violation Notice/Reminder Letter-Phone Call

¹ Under the EPA's Enforcement Response Policy and Enforcement Targeting Tool (ERP-ETT), water systems' violations are evaluated using a weighed points system. Each violation is assigned a number of points based on the assigned threat to public health, where priority is given to acute health based violations. (Acute health-based violations are worth 10 points, other health-based violations and Total Coliform Rule repeat monitoring violations are worth 5 points, nitrate monitoring and reporting violations are worth 5 points, and other monitoring and reporting and any other violations are worth 1 point.) Systems with greater than or equal to 11 points are designated as "priority systems".

System No. = water system number
 PWS = public water supply
 CWS = community water system
 RAA = Running Annual Average

NTNC = nontransient noncommunity water system
 TNC = transient noncommunity
 MCL = maximum contaminant level
 TT = Treatment Technique

PN = public notification
 Bottle Water = is the water system providing bottle water
 SWTR = Surface Water Treatment Rule
 LT1 = Long Term 1 Enhanced Surface Water Treatment Rule

Table B: TCR MCL Violations that only include Total Coliform Water Samples

Indicator of Possible Acute Health Risk

Coliforms are bacteria that are naturally present in the environment but not normally present in groundwater or properly treated surface water. Coliform bacteria are used as an indicator that other, potentially-harmful, bacteria may be present. While there is possibly no acute health effects, there is an indication of possible acute health risk.

Listed below are the water systems that had only Total Coliform (TC) positive (+) water samples that resulted in a MCL violation. A total coliform violation occurs when there are two (2) or more TC+ water samples collected in a calendar month.

System Number	System Name	PWS Class	Population Served	Monitoring Frequency	Total # of TCR MCL Violations (that include a TC sample) ¹	PWS on ETT >= 11 Points	Enforcement Action Taken
5000041	Maze Blvd. MHP	TNC	90	Quarterly	1	No	MCL, PN, Violation Notice/Reminder Letter-Phone Call
5000077	Ceres West MHP	CWS	161	Monthly	1	Yes	MCL, PN, Violation Notice/Reminder Letter-Phone Call
5000080	Country Western MHP	CWS	120	Monthly	2	Yes	MCL, PN, Violation Notice/Reminder Letter-Phone Call
5000086	Countryside MH Estates	CWS	60	Monthly	1	Yes	MCL, PN, Violation Notice/Reminder Letter-Phone Call
5000117	Lakewood Memorial Park	NTNC	26	Monthly	1	No	MCL, PN, Violation Notice/Reminder Letter-Phone Call
5000138	El Rincon Market	TNC	25	Quarterly	1	No	MCL, PN, Violation Notice/Reminder Letter-Phone Call
5000141	Libitzky Property	NTNC	125	Monthly	1	No	MCL, PN, Violation Notice/Reminder Letter-Phone Call
5000154	The Fruit Yard	TNC	75	Monthly	2	No	MCL, PN, Violation Notice/Reminder Letter-Phone Call
5000165	Woodward Reservoir	TNC	26	Monthly	2	No	MCL, PN, Violation Notice/Reminder Letter-Phone Call
5000166	Fox Grove Fishing Access	TNC	26	Quarterly	1	No	MCL, PN, Violation Notice/Reminder Letter-Phone Call
5000175	Shively's Bar and Grill	TNC	26	Quarterly	1	No	MCL, PN, Violation Notice/Reminder Letter-Phone Call
5000258	Farmer's Catfish House	TNC	26	Quarterly	1	No	MCL, PN, Violation Notice/Reminder Letter-Phone Call
5000273	Gratton School	NTNC	110	Monthly	1	Yes	MCL, PN, Violation Notice/Reminder Letter-Phone Call
5000313	Buehner WS	CWS	150	Monthly	1	No	MCL, PN, Violation Notice/Reminder Letter-Phone Call
5000389	Monterey Park Tract CSD	CWS	186	Monthly	2	Yes	MCL, PN, Violation Notice/Reminder Letter-Phone Call
5000465	Duarte Nursery	NTNC	75	Monthly	1	Yes	MCL, PN, Violation Notice/Reminder Letter-Phone Call

System No. = water system number PWS = public water supply CWS = community water system RAA = Running Annual Average	NTNC = nontransient noncommunity water system TNC = transient noncommunity MCL = maximum contaminant level TT = Treatment Technique	PN = public notification Bottle Water = is the water system providing bottle water SWTR=Surface Water Treatment Rule LT1= Long Term 1 Enhanced Surface Water Treatment Rule
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Table B: TCR MCL Violations that only include Total Coliform Water Samples-Continued

System Number	System Name	PWS Class	Population Served	Monitoring Frequency	Total # of TCR MCL Violations (that include a TC sample) ¹	PWS on ETT >= 11 Points	Enforcement Action Taken
5000478	VSP Products	NTNC	30	Monthly	2	No	MCL, PN, Violation Notice/Reminder Letter-Phone Call
5000487	J&J Farm Fresh Produce	TNC	25	Quarterly	1	No	MCL, PN, Violation Notice/Reminder Letter-Phone Call
5000494	Hypower Hydraulics	NTNC	30	Monthly	1	No	MCL, PN, Violation Notice/Reminder Letter-Phone Call
5000529	Sunrise Rock and RediMix	NTNC	25	Monthly	1	No	MCL, PN, Violation Notice/Reminder Letter-Phone Call
5000530	Frazier Nut Farms	NTNC	40	Monthly	1	No	MCL, PN, Violation Notice/Reminder Letter-Phone Call
5000571	Waterford Sportsmen's Club	NCWS	25	Quarterly	1	No	MCL, PN, Violation Notice/Reminder Letter-Phone Call
5000573	5033 Pentecost	NTNC	302	Monthly	1	No	MCL, PN, Violation Notice/Reminder Letter-Phone Call
5000577	Ashwani Sharma	TNC	25	Quarterly	1	No	MCL, PN, Violation Notice/Reminder Letter-Phone Call
5000581	Pioneer Equine Hospital	NTNC	25	Monthly	1	No	MCL, PN, Violation Notice/Reminder Letter-Phone Call
5000590	Cebro Frozen Foods	NTNC	25	Monthly	1	No	MCL, PN, Violation Notice/Reminder Letter-Phone Call

¹ Under the EPA's Enforcement Response Policy and Enforcement Targeting Tool (ERP-ETT), water systems' violations are evaluated using a weighed points system. Each violation is assigned a number of points based on the assigned threat to public health, where priority is given to acute health based violations. (Acute health-based violations are worth 10 points, other health-based violations and Total Coliform Rule repeat monitoring violations are worth 5 points, nitrate monitoring and reporting violations are worth 5 points, and other monitoring and reporting and any other violations are worth 1 point.) Systems with greater than or equal to 11 points are designated as "priority systems".

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

Listed below are water systems that were in exceedance of the arsenic MCL during FY 2010-2011 based on a running annual average (RAA) > 0.010 mg/L.

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	.012mg/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	.014mg/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	.026mg/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, Pre-Application submitted
5000085	Green Run Mobile Estates	CWS	100	.016mg/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	.014mg/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
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 blending proposal
5000218	Country Villa Apts.	CWS	30	.020mg/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 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	.038mg/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 completed 9/2011
5000465	Duarte Nursery-Lab	NTNC	75	.020mg/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	.014mg/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
5000553	Foster Farms	NTNC	25	.014mg/L	No	.010mg/L	8/28/09	Yes	Consolidated with the City of Turlock in May 2011
5000555	Piranha Produce	NTNC	26	.011mg/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

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 TNC = transient noncommunity
 MCL = maximum contaminant level
 TT = Treatment Technique

PN = public notification
 Bottle Water = is the water system providing bottle water
 SWTR=Surface Water Treatment Rule
 LT1= Long Term 1 Enhanced Surface Water Treatment Rule

Table D: 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
5000217	Faith Home Teen Ranch	CWS	50	60.5	No	9/30/09	Yes	No	New well drilled in 8/2009, to be placed on-line late 2011
5000389	Monterey Park Tract CSD	CWS	186	62.0	No	9/21/10	Yes	No	C.O. #DER-10CO-007, Feasibility Study completed 9/2011, City of Ceres agrees to provide water
5000490	Mountain View Chatom Recreation	TNC	25	57.0	No	8/28/09	Yes	No	Violation Notice/Reminder Letter-Phone Call; On-going PN

System No. = water system number
 PWS = public water supply
 CWS = community water system
 RAA = Running Annual Average

NTNC = nontransient noncommunity water system
 TNC = transient noncommunity
 MCL = maximum contaminant level
 TT = Treatment Technique

PN = public notification
 Bottle Water = is the water system providing bottle water
 SWTR=Surface Water Treatment Rule
 LT1= Long Term 1 Enhanced Surface Water Treatment Rule

Table E: Surface Water Treatment Rule Violations

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. All three (3) of the water systems with surface water treatment are using an approved filtration method. Listed below are surface water systems in violation of the SWTR and/or LT1ESWTR.

The multi-barrier treatment must reliably provide 99.9% reduction (3-log) of *Giardia lamblia* cysts and 99.99% (4-log) of viruses through filtration and disinfection. A removal credit for *Giardia lamblia* cysts and viruses is provided for each type of treatment installed when properly operated. In addition, the LT1ESWTR requires the removal of 90% (2-log) of *Cryptosporidium*. The remaining balance to the 3-log *Giardia lamblia* and 4-log viruses must be provided by adequate disinfectant contact time (CT) values.

One (1) of the three (3) water systems (thirty-three percent-33%) with a surface water source is in violation of the SWTR or LT1ESWTR. The LPA has initiated enforcement actions to bring that water system into compliance with the SWTR and the LT1ESWTR. More information on the required CT values is provided in Appendix C.

System No.	System Name	PWS Class	Population Served	Treatment Technique Violations			Date of Last Enforcement Action	PN	Comments
				Filtration Method Complaint	Turbidity Standard Violations	CT Inactivation Violation			
5000243	Frank Raines Park	TNC	26	No	Yes	Yes	1/5/2007	Yes	Compliance Order (CO) issued 1/7/07 (CO No. 03-10-07-001). Draft plans submitted to CDPH for ultrafiltration membrane treatment. CO expires September 2011. GWUDI having EC+ and EC+ results.

System No. = water system number
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 SWTR=Surface Water Treatment Rule
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RECOMMENDATIONS

CDPH finds that the Stanislaus County drinking water program is making an effort to achieve general compliance with CDPH's Local Primacy Agency 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 2010-2011 workplan. CDPH makes the following recommendations regarding the County's program:

1. Continue to prepare and submit a workplan annually to the Stockton District office and the Small Water Systems Unit in Sacramento no later than May 1st. The FY 2011-2012 workplan is due to the Stockton District office by May 1, 2012, of each year. The FY 12/13 workplan should have been submitted by May 1, 2012. To date, the Department has not received a copy of the FY 2012/2013 workplan.
2. Review all water system's water supply permits on file and update DER database with permit numbers. Compile an inventory list that will be used in the FY 2011-2012 evaluation. Reissue a permit whenever the original permit does not adequately describe the current system or is greater than ten (10) years old. 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. Each new permit needs to include an updated technical report.
3. Continue to require new water systems undergoing change of ownership to demonstrate TMF capacity before a water supply permit is issued.
4. Review all water system's current Bacteriological Sample Siting Plan (BSSP) on file to verify that it includes provisions for triggered source water monitoring per the California Groundwater Rule. The California Groundwater Rule requires all active sources to be monitored for bacteriological quality if a positive total coliform or *E. Coli* bacteria sample is detected on a routine distribution system sample. The BSSP should be updated if it is more than ten years old, and/or if it is no longer representative of the water system.
5. Ensure that all bacteriological sampling results are included in a water system file for the past five years. These results can be tabulated in a list.
6. Ensure that water systems are collecting the routine bacteriological samples at a sample site located in the distribution system, not at the source (i.e. well site). If the water system provides any continuous disinfection, the free chlorine residual at the time of bacteriological sampling must be recorded and reported with the bacteriological sample results.
7. The County should conduct sanitary surveys of community water systems a minimum of one time every three years and noncommunity water systems a minimum of once every five years as required by the California Groundwater Rule and the Long Term 1 Enhanced Surface Water Treatment Rule.
8. Verify that all water systems using surface water or groundwater under the direct influence of surface water (GWUDI) sources are in compliance with the filtration and disinfection

requirements of the Surface Water Treatment Rule (SWTR) on a monthly basis. Verify that all water systems using surface water or GWUDI sources are recording filtration and disinfection compliance data every day that the plant is in operation. Monthly reports of the filtration and disinfection compliance data must be submitted to the County. The County must review, track, and follow-up on monthly compliance with filtration and disinfection.

9. Verify that all water systems using surface water are reporting daily contact time (CT) values on the monthly reports. A CT calculator can be obtained from the Stockton District Office upon request.
10. Continue to carefully document enforcement actions taken and corrective actions required following the investigation of persistent bacteriological maximum contaminant level violations. Any water system that fails the Total Coliform Rule MCL three or more times in a 12 month period should be required to provide continuous disinfection of the water produced by the system's sources. All water systems that are providing continuous disinfection of the water produced by their sources, must monitor the bacteriological quality of the water a minimum of one time per month using a density method with results reported as most probable number per 100 milliliters (MPN/100 mL).
11. Review water system files to ensure that there is a current emergency notification plan (ENP) on file. This plan should be updated annually and could be required to be updated with the annual operating permit fees.
12. Ensure that water system sampling data is being transmitted by their contract ELAP-certified laboratory to the State water quality database (WQI) using Electronic Deliverable Format (EDF). To verify that the water system is in compliance with monitoring and reporting of required constituents, the County can access the WQI database via their Citrix account.
13. Ensure that the PWSs are monitoring and reporting all of the required chemicals for their source(s). All sources are assigned a primary station code (PSCode), which are used by an approved ELAP laboratory to transfer the water quality data to the CDPH database. If the correct PSCode is not on the water sample chain-of-custody supplied to the laboratory then the data will not successfully be transferred to the CDPH water quality database.
14. Submit EDT (Electronic Data Transfer) data files to CDPH-DWP Small Water Systems Unit on a monthly basis. These files are due no later than the last day of the month following the reporting period (ex. November 2011 reporting period is due no later than December 31, 2011). The files shall include any updates or additions to water system inventory, sources, source treatment/objective codes, inspections/sanitary surveys, water supply permits, violations, enforcement actions, and enforcement action violation associations.
15. Begin working with the Department's SWS Unit to assign source class codes to each public water system source based on source vulnerability. After assigning source class codes, the LPA will be able to generate a monitoring schedule to more efficiently track chemical source water quality compliance with monitoring and reporting requirements. The LPA will also be able to use the database as a tool to ensure that contract laboratories are submitting correct and timely data to the CDPH water quality database.

16. Follow the violation and enforcement action data entry guides that are provided to the County by the Department. This will ensure that your action data will migrate to the CDPH database by EDT.
17. For systems with MCL violations such as Arsenic or uranium, ensure the monitoring and reporting (M&R) of the running annual average (RAA) are maintained. Issue an M&R violation when the water system(s) is not in compliance. Provide a public notice to the customers and a proof of the public notification to the District Office within 30 days of the violation. Addressing enforcement actions should include the following criteria:
 - The Action must describe the specific provision of statute or regulation that has been violated.
 - The Action must cite the applicable provision of statute or regulation.
 - The Action must describe specific actions to be performed by the water system to return to compliance (i.e. directives).
 - The Action must include a compliance schedule.
 - The Action must inform the water system that failure to comply with the Action is, in and of itself, an enforceable action (i.e. Civil Penalty Clause).
18. Encourage all public water systems that have MCL violations for primary drinking water standards to complete the universal pre-application to be eligible for State-funding. Please contact the Stockton District Office for more information.
19. Ensure all lead and copper monitoring and enforcement is issued including the violations for FY 2010-2011 and FY 2011-2012. Implement the CDPH tracking database for lead and copper monitoring.
20. Continue to ensure that all new systems and all systems undergoing a change in ownership meet the applicable Technical, Managerial, and Financial (TMF) capacity requirements by evaluating the TMF capacity of those water systems during the permitting process to ensure that the systems can at all times provide water that meets drinking water standards to the public.
21. Continue to provide copies of all enforcement actions, permits and accompanying technical reports and TMF reports to the Stockton District Office.
22. Work with the Stockton District Office to address the Frank Raines Park water system violation for failing to provide filtered surface water. The current compliance order no. 03-10-07-001 dated January 7, 2007, expired in September 2011.
23. The Department recommends that the County transfers all water system with surface water systems and/or groundwater under the direct influence of surface water sources to the

Stockton District field office due to the increasingly complex regulations of surface water. The District will contact you in the future to discuss this matter.

24. 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

The Department looks forward to our continued partnership as we share the oversight of public water systems in Stanislaus County.

Report Submitted by:

Date: _____

Kassy D. Chauhan, P.E.
Acting Stockton District Engineer
Southern California Field Operations Branch
Drinking Water Field Operations

Report Prepared by:

Wendy Killou, Environmental Scientist
Scientific and Environmental Services Section
Small Water Systems Unit

Appendices:

- Appendix A – LPA Permit Activities
- Appendix B – LPA Surveillance Activities
- Appendix C – LPA Sampling and Monitoring Activities
- Appendix D – LPA Reporting Activities
- Appendix E – LPA Enforcement Activities
- Appendix F – LPA Program Management Activities

Appendix A
LPA Permits Activities
Per Title 22-CCR, §64254

Since 2002, 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. CHSC Section 116525(c) 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.

In most instances, permits have primarily been issued as the sanitary survey for a system is completed to bring the water system back into compliance with the current permitting guidelines, to new water systems, water system change of ownership, systems adding sources or treatment, and systems using surface water treatment. In addition, 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 2010-2011, the County issued one permit to small water systems as summarized in Table 1 below.

Since 2002, the County has issued a new permit annually to each public water system under its jurisdiction. This permit served to acknowledge receipt of the annual operating fee collected by the Stanislaus County Department of Environmental Resources, but is not recognized by the CDPH as a domestic water supply permit.

Table 1: FY 2010-2011 Permit Information

Type of Permit Issued (other than the annual permit)	No. Completed
New Public Water System	1
Change of Ownership	0
Change in Source or Treatment	1
Other	1
Total	3

Tables 2 through 4 contain the permit information of 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 (3 water systems) in FY 2010-11. Frank Raines Park OHV is listed in the table with the water system with surface water treatment as it will be providing surface water treatment to its well. The well was determined to be groundwater under the direct influence of surface water (GWUDI) and is subject to the Surface Water Treatment Rule (SWTR).

All water systems that are providing treatment for primary MCL exceedance or compliance with the SWTR must submit a monthly treatment report. The County must review the monthly report to evaluate whether or not the treatment is adequate to comply with the drinking water standards and/or the SWTR, and whether or not the treatment is being operated in accordance with the

approved operations plans. Each treatment system must have an operations plan that has been reviewed and approved by the County. The water supply permit should contain a provision that the treatment system must be operated in accordance with the approved operations plan. Any changes in the treatment system must be reflected in the operations plan and must be approved by the County prior to the change being implemented.

THE COUNTY IS IN COMPLIANCE WITH APPENDIX A REQUIREMENTS: YES NO

Table 2: 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, Uranium	IX	9/12/05
5000116	Roselawn High School	NTNC	223	Nitrates	IX	2/8/02
5000193	Patterson Vegetable Co.	NTNC	850	PCE	IX	5/20/93
5000286	Bronco Winery	NTNC	200	DBCP, Nitrates	IX, RO	2/1/93
5000473	Excell Center	NTNC	25	DBCP	GAC	5/20/93

¹Granular Activated Carbon

Table 3: Water Systems Subject to the Surface Water Rule

System No.	System Name	PWS Class	Population Served	Filtration Method	Grade of Certified Operator	Date of Permit Approving Treatment
5000008	Knights Ferry CSD	CWS	85	Conventional	T2	5/19/93
5000010	TID/La Grange Water System	CWS	120	Alternative-2 Roberts Filters	D2, T2	8/1/06
5000243	Frank Raines Park	TNC	26	None	D2	None

Table 4: Water Systems with Continuous Chlorination

System No.	System Name	PWS Class	Population Served	Source Type	Chlorination Injection Point	Chlorination Method Type	Source Bacteriological Monitoring	Treating for Compliance with TCR	Date of Permit Approving Treatment	Current Grade of On-site Treatment Operator	Comments
5000019	Riverdale Park Tract CSD	CWS	300	GW	Pre-storage	Liquid	Yes	No	Pending	D2, T2	
5000109	Ceres Unified/ Westport School	NTNC	100	GW	Post-treatment	Liquid	Yes	No	9/12/05	D1, T2	
5000116	Roselawn High School	NTNC	223	GW	Post-treatment	Liquid	Yes	No	2/8/02	D2, T2	
5000133	Hart Ransom School	NTNC	650	GW	At well after check valve	Hypo chlorination/ liquid (Stand by well) Newest (2011 Well is Untreated)	Yes	No	5/19/93	D1	
5000179	Sconza Candy Co	NTNC	650	GW	At well after check valve	Hypo chlorination/ liquid,	Yes	No	3/2/93	D1	
5000193	Patterson Vegetable Company	NTNC	850	GW	Pre-storage	Liquid	Yes	No	5/20/93	D1	
5000286	Bronco Winery	NTNC	200	GW	Post-treatment	Liquid	Yes	No	2/1/93	T2	
5000408	Westley CSD	CWS	70	GW	From Hillview Homes	Purchased water	Yes	No	5/17/93	D1	
5000427	Covanta Stanislaus Waste Energy	NTNC	25	GW	Post-storage	Liquid	Yes	No	8/15/01	D3, T5	
5000481	Foster Farms - Ellenwood	NTNC	40	GW	At well heads after check valves	Hypo chlorination/ liquid,	Yes	No	12/15/93	T1	

Appendix B
LPA Surveillance Activities
Per Title 22-CCR, §64255

Inventory

During FY 2010-2011, the County regulated 183 active public water systems (PWSs) that are 200 service connections or less. Of the 183 water systems, the County regulated two surface water systems and one groundwater under the direct influence of surface water (GWUDI). The two surface water systems were in full operation and the one GWUDI source, Frank Raines Park OHV, was used for irrigation only (no domestic use) in FY 2010-2011. Frank Raines OHV is under a Compliance Order to provide treatment. Plans for an ultrafiltration membrane treatment system are currently under review.

Table 5 is a summary of the inventory of the public water systems based on classification. See Table 9 for a detailed list of the County’s water system inventory.

Table 5: FY 2010-2011 Public Water System Inventory Summary

Water System Classification	Number
Community (CWS)	44
Non-transient-Non-community (NTNC)	60
Transient-Non-community (TNC)	79
Total	183

In addition, the County also maintains an inventory of other water systems as shown in Table 6 below. See Table 9 for a detailed list of the County’s other water system inventory.

Table 6: FY 10/11 Other Water System Inventory Summary

Water System Classification	Number
State Small	24
Hand Washing Exemption (TNC)	0
CalCode/CURFL	13
Total	20

The County maintains the following information for all public water systems, which is required by the Primacy Delegation Agreement:

- System name
- Water system identification number
- Mailing address
- Type of system
- Name, address and phone number of the responsible party

- Type of ownership
- Type of source
- Type of treatment if any
- Dates of operation for seasonally operated systems
- And either the number of service connections or the average monthly population served.

Table 7 summarizes the PWSs that were reclassified and those PWSs that were added or removed from the inventory of active PWSs regulated by the Stanislaus County LPA. In addition, PWSs listed in Table 8 had a change in ownership during the FY 2010-2011.

Table 7: Water System Change in Status or Classification in FY 2010-2011

System Number	System Name	Old Classification	New Classification	Activations / Inactivation	Date of change	Inactivation Reason
5000068	Tuolumne River Resort	CWS		Inactivate	9/13/10	Lowered the number of service connections
5000136	Log Cabin		TNC	Activate	9/1/10	
5000352	VFW Post 3199		TNC	Activate	11/10/10	
5000404	Wood Colony School		NTNC	Activate	1/27/11	
5000411	United Rentals	NTNC		Inactivate	12/31/10	Business closed
5000434	Ceres Sports Arena	TNC		Inactivate	10/6/10	Business closed
5000537	AT&T Water System		NTNC	Activate	8/25/10	
5000553	Foster Farms-West Main		NTNC	Inactivate	5/13/11	Consolidated with the City of Turlock
5000568	Gregori High School		NTNC	Activate	7/30/10	
5000590	Cebro Frozen Food	NTNC		Activate	1/13/11	

Table 8: Systems That Have Changed Ownership in FY 2010-2011

System Number	System Name	Permit Date	Water System Type
5000076	Catfish Camp	Not Issue Yet	TNC
5000443	Triangle Truck Stop	Not Issue Yet	TNC

Table 9: Inventory of Stanislaus County Public Water Systems

Community Water Systems			
Water System No.	Water System Name	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

Community Water Systems			
Water System No.	Water System Name	Population	Connections
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 # of Community Water Systems		44	

Non-transient Non-community Water Systems			
Water System No.	Water System Name	Population	Connections
5000548	MONTPELIER ORCHARDS (WATER)	25	2
5000552	KIERNAN BUSINESS CENTER	120	1
5000537	AT&T WATER SYSTEM	80	2
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

Non-transient Non-community Water Systems			
Water System No.	Water System Name	Population	Connections
5000189	NMIP FIRE & WATER SYSTEM, LLC	300	24
5000193	PATTERSON VEGETABLE COMPANY	850	4
5000202	JOE'S TRAVEL PLAZA (EH)	26	4
5000404	WOOD COLONY SCHOOL	90	2
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
5000590	CEBRO FROZEN FOODS	25	1
Total # of Non-transient Non-community Water Systems			59

Transient Non-community Water Systems			
Water System No.	Water System Name	Population	Connections
5000547	KEYES 76 (WATER SYSTEM)	25	2
5000551	BEL PASSI BASEBALL	25	1
5000561	MC HENRY GOLF CENTER WATER SYSTEM	25	1

Transient Non-community Water Systems			
Water System No.	Water System Name	Population	Connections
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

Transient Non-community Water Systems			
Water System No.	Water System Name	Population	Connections
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
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
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
5000352	VFW POST 3199	26	2
Total # of Transient Non-community Water Systems			80

State Small Water Systems			
Water System No.	Water System Name	Population	Connections
5000003	LEDBETTER WATER SYSTEM	24	14
5000020	MUTUAL WATER COMPANY	~5	~5
5000035	EL RANCHO MOBILE PARK	8	8
5000044	PIONEER VILLAGE MOBILE HOME	20	12
5000062	SHILOH RIVER RESORT	20	10
5000219	DAVIS COURT	~5	~5
5000224	FLOYD OVERHOLTZER WATER SYSTEM	~5	~5
5000225	SHASTA MOTEL	~5	~5
5000236	WALNUT GROVE APTS.	~5	~5
5000268	JOHN LORENZO WATER SYSTEM	~5	~5
5000301	VILLA LAS FLORES	24	13
5000306	B&C ZACHARIAH WATER SYSTEM	~5	~5
5000316	CURTIS INVESTMENTS	24	14
5000319	MILLER APARTMENTS	~5	~5
5000336	DEEVON WATER COMPANY	~5	~5
5000337	CARSON DAY WATER SYSTEM	~5	~5
5000342	TRAN WATER SYSTEM	18	6
5000371	ROHDE ROAD APARTMENTS	12	8
5000385	SILVA&SONS DAIRY BY-PRODUCT SITE	~5	~5
5000388	CARDOZA WATER SYSTEM	24	9
5000413	STARN, R.C.&SONS	24	8
5000435	BLOOMINGCAMP WATER SYSTEM	24	12
5000506	OLIVEIRA WATER SYSTEM	20	5
5000557	VILLAGE FOOD MART	20	6
Total # of State Small Water Systems			24

Cal Code/CURFL Water Systems			
Water System No.	Water System Name	Population	Connections
5000229	CENTRAL MARKET WATER SYSTEM	26	1
5000254	RISING SUN SCHOOL	19	2
5000457	AL'S FOOD MART WATER SYSTEM	50	2
5000492	WILLIE'S MARKET	25	1
5000520	OAKDALE SADDLE CLUB	25	1
5000540	FONTANA FARMS PRODUCE MARKET	24	1
5000546	ROOT FARMS, INC.	5	1
5000567	FISCALINI CHEESE COMPANY	20	1
5000572	AIRPORT GROCERY	25	1
5000575	AMERINE ORCHARDS WATER SYSTEM	8	1
5000589	NEWMAN STOCKYARDS	24	1
5000591	MIKE'S BRANDING IRON B-B-Q	2	2
Total # of Cal Code/CURFL Water Systems		13	

Inspections / Sanitary Surveys

Routine inspection and sanitary survey frequencies are based on the type of system, source and any required treatment. The LPA made an effort to meet the inspection frequencies outlined in the FY 2010-2011 workplan, which was taken from the LPA Delegation Agreement (Title 22-CCR Section 64255 and Table 10). However, both the State and Federal Groundwater Rule (CFR 40 Section 141.21) and the Long Term 2 Enhanced Surface Water Treatment Rule (40 CFR, Section 142.16) specify that sanitary surveys must be conducted no less frequently than every three (3) years for community systems and no less frequently than every five (5) years for non-community systems.

A sanitary survey consists of a review of the water system permit and file as well as an onsite inspection of eight (8) elements to evaluate the water system's ability to produce and distribute safe and reliable drinking water as follows:

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.

To effectively manage sanitary survey findings, the LPA must track the deficiencies noted during surveys and schedule corrective actions appropriately, including initiation of enforcement actions when systems fail to correct deficiencies in a timely manner.

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 10 summarizes the routine inspections of public water systems conducted in FY 2010-2011 by the County and the frequency specified in the FY 2010-2011 workplan.

Table 10: FY 2010-2011 Inspection Summary

Type of System	Mandated Minimum Inspection Frequency per LPA delegation	Inventory of SWSs	Inspections Projected in FY 10/11 Work plan	Inspections Completed in FY 10/11
Surface water/GWUDI ¹ or GW treating to meet a primary standard	Every 2 years	10	6	4
CWS & NTNCs using GW without treatment	Every 5 years	94	29	26
TNCs using GW without treatment	Every 5 years	79	14	18
Total	---	183	49	48

¹GWUDI (Groundwater under the direct influence of surface water)

During FY 2010-2011, routine inspections were completed on 48 public water systems, as shown in Table 10. The total number of inspections completed in FY 2010-2011 represents 27% of the County's inventory of SWSs, 98% of the projected inspections in the County's FY 2010-2011 workplan.

THE COUNTY IS IN COMPLIANCE WITH APPENDIX B REQUIREMENTS: YES NO

Appendix C
LPA Monitoring Activities
Per Title 22-CCR, §64256

Bacteriological Monitoring

All of the County SWSs have a Bacteriological Sample Siting Plan (BSSP) on file. The LPA-developed form is standardized and must be completed by staff or the water system operator. Updates of the BSSPs are required by County Staff when systems are changing ownership or when the plan has been determined by County Staff to be outdated. All PWSs are required to updated their BSSP a minimum of every ten years as stated in Title 22-CCR, Section 64416(a)(4).

When a small water system has been determined to have failed the Total Coliform Rule (TCR) 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 is 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 five (5) routine samples the month following the TCR MCL failure, in accordance with requirements of the TCR.

Furthermore the LPA has required water systems to conduct total coliform monitoring of all groundwater sources in operation 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 California Groundwater Rule (GWR).

It is CDPH policy to require groundwater sources with continuous chlorination to monitor for total coliform water from the wellhead. The initial monitoring schedule should consist of monthly sampling for six months. If coliform bacteria are not detected in this initial sampling set, then the monitoring frequency may be reduced to once per quarter. An analytical method providing a presence/absence result for total coliform bacteria is adequate for the routine raw groundwater samples. The absence of total chlorine residual must be verified prior to collecting bacteriological samples of the untreated water from the sample tap. Refer to Table 4 for continuously chlorinated water systems that are required to monitor their groundwater source a minimum of once per quarter.

If a routine raw water sample does show the presence of total coliform bacteria, then all repeat sampling or ongoing sampling must be analyzed with a test method that enumerates the result and shows the coliform and *E.coli* density expressed as most probable number per 100 ml (MPN/100 ml). The County should ensure that all bacteriological raw water monitoring is conducted on quarterly basis for all public water systems.

In instances where a groundwater 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 groundwater source;

- 2) Consolidate with another PWS;
- 3) Provide surface water treatment to the effected groundwater supply.

Wells subject to *E.coli* bacteria or 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 groundwater.

Chemical/Radiological Water Quality Monitoring

The County notifies the SWSs of their monitoring and reporting requirements by providing a monitoring schedule to the water system operator in an annual mailing, during inspections and issuance of new or amended permits, or upon request. Chemical data submitted by the SWSs are received and reviewed by the applicable water team member. 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 chemicals (VOCs) monitoring requirements. Hard copies of all chemical monitoring results are maintained in the water system file.

Systems Providing Surface Water Treatment Plants Monthly Reports

PWSs 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 water-borne pathogens. The SWTR and/or the Long Term 1 Enhanced Surface Water Treatment Rule (LT1ESWTR) established standards for approved filtration methods to ensure that these pathogens are reliably removed by the filtration process. The PWS must verify monthly that all surface water and GWUDI sources are in compliance with the filtration and disinfection requirements of the SWTR, and that the filtration and disinfection compliance data is being recorded daily when the plant is in operation. Monthly reports of the filtration and disinfection compliance data must be submitted to the LPA. The LPA must review, track, and follow up monthly with filtration and disinfection compliance.

During FY 2010-2011 there were two SWSs with surface water treatment plants providing domestic water. The third water system (Frank Raines Park) is currently in violation of the SWTR because they have not installed an approved surface water treatment plant, resulting in providing unfiltered surface water in the distribution system. Table 11 lists 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 SWTR reporting requirements. All water systems providing treatment are required to have approved operation plans.

Table 11: Water System Subject to the Surface Water Treatment Rule

System No.	System Name	PWS Class	Source Type	Filtration Method	Turbidity Performance Standard (NTU)	Monthly SWTR Reports Submitted	Quarterly DBP Reports Submitted	Quarterly TOC ¹ Reports Submitted	Operations Plan	Emergency Disinfection Plan
5000008	Knights Ferry CSD	CWS	SW	Alternative-2 Roberts Filters	0.1	Yes	Yes	N/A	Yes	Yes
5000010	TID/La Grange Water System	CWS	SW	Conventional	0.3	Yes	Yes, annually	Yes	Yes	Yes
5000243	Frank Raines Park	TNC	GWUDI	Under Construction	N/A	Yes	No	N/A	No	No
1 TOC reports are for conventional treatment plants										

Stage 1 Disinfectants/Disinfection By-Products Rule (ST1 DBRP)

The County maintains a database that can track community and nontransient, noncommunity water systems utilizing disinfection compliance with monitoring requirements of the DBP Rule. All community and nontransient, noncommunity surface water systems and groundwater systems that are chlorinating were notified by the LPA 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 requirement. The majority of 13 water systems that are required to monitor for DBP 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 (0.060mg/L). The monitoring frequency can be reduced from one sample annually to one sample every three years if the TTHM and HAA5 levels are below the triggers. Refer to Table 3 and 4 for groundwater systems that are chlorinating as well as the surface water systems, which are required to disinfect.

Lead and Copper Rule

The County maintains a database that can track community and nontransient, noncommunity water systems compliance with monitoring requirements of the 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 in exceedance for lead and/or copper, then the following steps shall be taken based on the direction of the LPA:

- Perform initial water quality parameter monitoring (WQP Monitoring)
- Perform a correction control study
- Install a corrosion control treatment device

If the action level for lead is exceeded additional requirements are required, which includes public notification. 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 103 water systems that are required to comply with the requirements of the LCR

have conducted the required monitoring. None water systems that are subject to the LCR have exceeded the AL for lead or copper as shown in Table 12 below.

Table 12: Water Systems with Lead and Copper Rule Action Level (AL)^{1,2} Exceedances or Monitoring Violations

System No.	System Name	PWS Class	Population Served	AL Exceedance Copper	AL Exceedance Lead	Monitoring Violations	Enforcement Action ³	WQP Monitoring	Corrosion Control Study	Corrosion Control Installed
NO VIOLATIONS IN FY 2010-2011										

¹ Lead AL is a "90th percentile" lead level that is greater than 0.015 mg/L

² Copper AL "90th percentile" copper level is greater than 1.3 mg/L

³ Enforcement Actions = Violation notice (IA); Formal Notice of Violation (FJ); Compliance agreement (FK); Compliance Order or Citation without fines (FL); Citation with fine (FM)

THE COUNTY IS IN COMPLIANCE WITH APPENDIX C REQUIREMENTS: YES NO

Appendix D
LPA Reporting Activities
Per Title 22-CCR 22, §64257

The LPAs are required to report public water system program information electronically (EDT) to the CDPH-DWP Small Water Systems Unit under Title 22-CCR Section 64257. The information for the required reporting includes:

- **Monthly:** a listing of all small water systems that failed in the previous month to comply with drinking water monitoring and reporting regulations (i.e., primary drinking water standard violations and monitoring and reporting violations), including the system name and identification number, the type of violation and the type of enforcement action taken, if any.
- **Quarterly:** a list of permits that have been issued, amended or renewed, and a list of small water systems for which a routine inspection or sanitary survey was conducted.
- **Annual:** the inventory of Small Water Systems under the jurisdiction of the LPA.

The CDPH-DWP Small Water Systems Unit has requested that above reports be submitted monthly by the LPA for tracking purposes. Error reports on the data submitted electronically are provided to the LPA from CDPH-DWP Small Water Systems Unit. The LPA must review these error reports and correct any data formatting errors accordingly, then re-submit the data with the following reporting period data. The County did not submit data as requested in a timely manner for FY 10/11, but the LPA did submit a large amount of data that included FY 10/11 water system information in October 2011.

THE COUNTY IS IN COMPLIANCE WITH APPENDIX D REQUIREMENTS : YES NO

Appendix E
LPA Enforcement Activities
Per Title 22-CCR, §64258

Enforcement Actions

Under the terms of the Primacy Delegation Agreement, 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 notices of violation and can schedule administrative public hearings for repeat violations and/or failure to return to compliance. During the FY 10/11 the LPA issued a total of ninety-one (91) enforcement actions, and issued five (5) compliance orders to water systems that continue to be under a nitrate or arsenic MCL violation. Table 13 summarizes the number of enforcement actions issue by constituent.

Table 13: Summary of Enforcement Actions Issued by Constituent

Constituent	Number of Enforcement Actions
Arsenic	17
Bacteriological	52
Nitrate	6
Other IOC	0
VOC	0
SOC	0
Radiological	0
CCR	0
Total	75

Violations

Tables C through E in the beginning of this 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. Twenty (20) SWSs (11 percent of the 183 small water systems in the County) are not in compliance with a primary drinking water standard.

Non-community water systems with chronic chemical contaminants, particularly for nitrate contamination can apply for a waiver to provide bottle water for drinking water as interim measure until such time as treatment is installed or another potable water source is developed (onsite well or connection with another water system). The approval of bottled water use requires that such use be processed as a permit amendment and that appropriate conditions be added to the Water Supply Permit. The conditions in the permit should include: monitoring of the source water for nitrate and bacteriological quality; user notification and the posting of approved warning signs; documentation of bottled water usage and quarterly reporting to LPA on usage, and; an annual report to the LPA on the availability of treatment, securing a new source, or connecting to another public water system. Table

14 contains a table of the non-community water systems that have been granted a waiver by the LPA and tracks the individual water system's compliance with the conditions of the permit. Water systems that fail to comply with the conditions of the permit are to be sent a notice of violation stating that the system is in violation of the permit, the corrective action(s) that system must take to be in compliance, and compliance date by which the corrective actions must be completed. These permit violations must be recorded in the DER database and reported by EDT to CDPH. Table 14 lists non-community water systems that are currently providing bottled water as an interim measure. A review and analysis of the Table 14 reveals that 100 % of the water systems failed to submit an annual report to the County.

Table 14: 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
						3Q 10	4Q 10	1Q 11	2Q 11	3Q 10	4Q 10	1Q 11	2Q 11		
5000195	Swanson Farms	NTNC	25	Arsenic	NA	Y	Y	Y	Y	Y	Y	Y	Y	Y	
5000553	Foster Farms	NTNC	25	Arsenic	NA	Y	Y	Y	Y	Y	Y	Y	Y	NA	Inactivated 5/13/2011 connected to City water.

In addition to addressing water systems with violations of MCLs of primary drinking water standards, the County also addressed monitoring and reporting violations. These can include, but not limited to the TCR and source water monitoring and reporting violations. The County staff took appropriate enforcement action by issuing an enforcement letter for these violations. Public notification was required for these violations. Table 15 summarizes the violations that the County addressed (MCL violations are not included).

Table 15: Summary of Non-MCL Violations

Type of Violation	Number of Violations
Source Water Monitoring and Reporting	0
TCR Monitoring and Reporting	2
Other	0
Totals	2

Certified Treatment and Distribution System Operators

Section 106885 of the CHSC states that any person that operates or supervises the operation of a water treatment plant or a distribution system of a community or non-transient non-community water system shall possess a valid and current water treatment and/or distribution operator certificate of the appropriate grade in accordance with the regulations referred to in Section 106910.

The determination of the level of operator certification required for a public water system is defined in the Title 22-CCR, Sections 63765 (water treatment) and 63770 (distribution system). The County has classified all water systems for the appropriate level of water treatment and distribution system operator certification. Each water system has been advised of their system classification for certified treatment or distribution system operator certification.

Consumer Confidence Report

Section 64480(a) of Title 22-CCR requires each community and non-transient non-community public water system to prepare and issue a Consumer Confidence Report to customers or consumers no later than July 1st annually and submit a certification of distribution to the County no later than October 1st annually. County staff tracks compliance of all SWSs with this requirement. Guidance on the development of the material that must be included in the Consumer Confidence report is provided on CDPHs website. In FY 10/11 96% of the water system complied with the Consumer Confidence Report reporting requirements. Table 16 lists community and non-transient non-community that have failed to submit a 2010 CCR.

Table 16: Water Systems 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	
5000095	Sunrise Village MHP	CWS	No	No	
5000109	Ceres Unified/Westport 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	

THE COUNTY IS IN COMPLIANCE WITH APPENDIX E REQUIREMENTS: YES NO

Appendix F
LPA Program Management Activities
Per 22-CCR, Sec. §64259

The LPA is under the Environmental Health Division of the Stanislaus County Department of Environmental Resources, is responsible for the management of the County's SWS regulatory program. The water program is administered by the Director of Environmental Health- Sonya K. Harrigfeld, an Environmental Health Program Manager-Janis Mein, and one full time Senior Environmental Health Specialist-John Aud. Additionally there are three (3) field staff that spends approximately thirty percent (30%) of their time in the Small Water System Program-Karl Quinn, Rachel Simons, and Denny Vang. All staff listed above is a registered environmental specialist. 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 annual operating fees based on receiving no violations and the certified ELAP laboratory electronically submitting bacteriological sample data to the County's DER database. Table 17 lists the various fees that Stanislaus County Environmental Resources charges to the public water systems.

Table 17: Stanislaus Environmental Health Fees for FY 10/11

Fee Description	Current Fee
Water System Technical, Managerial and Financial Review	WLR* (3 hr. min)
Water System Permit Issuance	WLR (2 hr. min)
Permit Amendment	WLR (5 hr. min)
Community Single Source No Treatment (1A)	\$ 900.00
Community Single Source No Treatment Incentive Program "A" (1AA)	\$ 650.00
Community Single Source No Treatment Incentive Program "B" (1AB)	\$ 750.00
Community Single Source Treatment (1B)	\$ 1,000.00
Community Single Source Treatment Incentive Program "A" (1BA)	\$ 750.00
Community Single Source Treatment Incentive Program "B" (1BB)	\$ 850.00
Community Multiple Source No Treatment (1C)	\$ 1,200.00
Community Multiple Source No Treatment Incentive Program "A" (1CA)	\$ 950.00
Community Multiple Source No Treatment Incentive Program "B" (1CB)	\$ 1,050.00
Community Multiple Source Treatment (1D)	\$ 1,300.00
Community Multiple Source Treatment Incentive Program "A" (1DA)	\$ 1,050.00
Community Multiple Source Treatment Incentive Program "B" (1DB)	\$ 1,150.00
Non-Transient Non-Community Single Source No Treatment (2A)	\$ 850.00
Non-Transient Non-Community Single Source No Treatment Incentive Program "A" (2AA)	\$ 600.00
Non-Transient Non-Community Single Source No Treatment Incentive Program "B" (2AB)	\$ 700.00
Non-Transient Non-Community Single Source Treatment (2B)	\$ 950.00
Non-Transient Non-Community Single Source Treatment Incentive Program "A" (2BA)	\$ 700.00
Non-Transient Non-Community Single Source Treatment Incentive Program "B" (2BB)	\$ 800.00
Non-Transient Non-Community Multiple Source No Treatment (2C)	\$ 1,150.00
Non-Transient Non-Community Multiple Source No Treatment Incentive Program "A" (2CA)	\$ 900.00
Non-Transient Non-Community Multiple Source No Treatment Incentive Program "B" (2CB)	\$ 1,000.00
Non-Transient Non-Community Multiple Source Treatment (2D)	\$ 1,250.00
Non-Transient Non-Community Multiple Source Treatment Incentive Program "A" (2DA)	\$ 1,000.00
Non-Transient Non-Community Multiple Source Treatment Incentive	\$ 1,100.00

Fee Description	Current Fee
Program "B" (2DB)	
Transient Non-Community Single Source No Treatment (3A)	\$ 750.00
Transient Non-Community Single Source No Treatment Incentive Program "A" (3AA)	\$ 500.00
Transient Non-Community Single Source No Treatment Incentive Program "B" (3AB)	\$ 600.00
Transient Non-Community Single Source Treatment (3B)	\$ 850.00
Transient Non-Community Single Source Treatment Incentive Program "A" (3BA)	\$ 600.00
Transient Non-Community Single Source Treatment Incentive Program "B" (3BB)	\$ 700.00
Transient Non-Community Multiple Source No Treatment (3C)	\$ 1,050.00
Transient Non-Community Multiple Source No Treatment Incentive Program "A" (3CA)	\$ 800.00
Transient Non-Community Multiple Source No Treatment Incentive Program "B" (3CB)	\$ 900.00
Transient Non-Community Multiple Source Treatment (3D)	\$ 1,150.00
Transient Non-Community Multiple Source Treatment Incentive Program "A" (3DA)	\$ 900.00
Transient Non-Community Multiple Source Treatment Incentive Program "B" (3DB)	\$ 1,000.00
State Small Single Source No Treatment (4A)	\$ 550.00
State Small Single Source No Treatment Incentive Program "A" (4AA)	\$ 300.00
State Small Single Source No Treatment Incentive Program "B" (4AB)	\$ 400.00
State Small Single Source Treatment (4B)	\$ 750.00
State Small Single Source Treatment Incentive Program "A" (4BA)	\$ 500.00
State Small Single Source Treatment Incentive Program "B" (4BB)	\$ 600.00
Water Samples	\$ 110.00
Well Destruction	\$ 310.00
Well Destruction Without A Permit	\$ 518.00
Concurrent Well Installation And Well Destruction – One Inspection Only	\$ 578.00
Well Call-Back	WLR
Well Permits Public	\$ 578.00
Well Modification Public	\$ 444.00
Well Installation Without a Valid Permit	\$ 707.00
Dry Well Permit	\$ 222.00
Dry Well Permit, 2 Or More, Installed Concurrently, Same Property	WLR (3 hr. min)
Dry Well Destruction	\$ 370.00
Dry Well Destruction, 2 Or More, Destroyed Concurrently, Same Property	WLR (3 hr. min)
Consultation	WLR
Food Code Water System Level 1	\$ 308.00
Food Code Water System Level 2	\$ 206.00
Enforcement	WLR (6 hr. min)
Public Water System Violation	WLR (2 hr. min)
Variance/Exemption/Waiver	WLR
Plan Review	WLR
Maximum Contaminant Level Violations	WLR (1 hr. min)
Justified Complaint	WLR (1 hr. min)
*WLR is \$95.00	

Section 64260, Title 22-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 activities that include the following:

- Listing goals and objectives
- Maintaining water system inventory and files

- Issuing water supply permits
- Conducting inspections/sanitary surveys
- Monitoring water quality data
- Submitting various reports to CDPH
- Issuing enforcement actions
- Maintaining and submitting data to CDPH

The County has submitted a workplan for FY 11/12, dated April 29, 2011, but failed to submit the FY 12/13 workplan that was due by May 1, 2012.

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 water system 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 ownerships.

Drinking Source Water Assessment Program (SWAP)

All existing water systems in Stanislaus County have completed a Source Water Assessment to meet the requirements of the Drinking Source Water Assessment Program. The assessments include a delineation of the surrounding water source area, an inventory of potential contaminating activities that might lead to the release of microbiological or chemical contamination, and a determination of which potential contaminating activities the water source is most vulnerable. A summary of the assessment is included with the water system's annual Consumer Confidence Report.

CDPH Infrastructure Financing Programs

The State has several funding programs to assist small water systems with improvements to bring the systems into compliance with state and federal regulations. The LPA forwards information relating to

state funding programs from the CDPH to all water systems that have significant deficiencies. The information includes a pre-application for funding and deadline for its submittal to the Department. The LPA assists the Department in evaluating proposed projects for their systems requesting funding under the various programs.

Table 18 lists water systems under the Stanislaus County LPA regulatory jurisdiction that submitted pre-applications and were on a priority project list (PPL) and invited to apply for funding in one of the three Department’s funding programs-Propositions 50, 80, and the State Revolving Fund (SRF) in FY 10/11. Table 19 lists water systems under the Stanislaus County LPA regulatory jurisdiction that were in the process to receive a funding agreement-also known to be the pipeline-in one of the three Department’s funding programs-Propositions 50, 80, and the State Revolving Fund (SRF) in FY 10/11.

Table 18: Water Systems Invited to Apply for Funding Under CDPH Funding Programs

Water System No.	Project Number	System Name	Project Reason	CDPH Funding Type	Estimated Eligible Cost	Status
5000243	001	Frank Raines Park OHV	Infiltration Gallery Subject to Coliform Contamination	SRF-Category C	\$ 621,505	PWS will be sent an invitation to submit an application in 1/2012.
5000273	001	Gratton School	Filtration Water System	SRF- Category G	\$ 80,000	PWS will be sent an invitation to submit an application in 1/2012.
5000085	001	Green Run Mobile Estates	Connection to City of Keyes water system for Arsenic compliance	SRF- Category G	\$ 200,000	PWS will be sent an invitation to submit an application in 1/2012.
5000080	001P	Country Western Mobile Home Park	Country Western Mobile Home Park Application 2008	SRF- Category G	\$ 40,000	In a funding agreement for planning, but when completed, they will apply for construction loan.
5000218	001/003	Country Villa Apts	North Well Arsenic Treatment Facility	SRF- Category G	\$ 120,000	PWS will be sent an invitation to submit an application in 1/2012.
5000335	002	Brethren Heritage School, Inc.	Brethren Heritage School PreApp	SRF- Category G	\$10,000	PWS will be sent an invitation to submit an application in 1/2012.
5000086	002	Countryside Mobile Home Estates-Adult P	Internal Water System and Arsenic Treatment	SRF- Category G	\$250,000	PWS will be sent an invitation to submit an application in 1/2012.
5000217	002	Faith Home Teen	Faith Home Teen Ranch/San Joaquin Teen Challenge Well #2	SRF- Category F	\$100,000	PWS will be sent an invitation to submit an application in 1/2012.

Table 19: Water Systems Currently in the Process of Receiving a CDPH Funding Agreement

Water System No.	Project Number	System Name	Project Reason	CDPH Funding Type	Estimated Eligible Cost	Status
5000033	001	Cobles Corner	Arsenic Remediation Planning Project	SRF- Category G	\$ 89,000	In pipeline to receive a funding agreement.
5000389	002C	Monterey Park Tract	Consolidation with City of Ceres (Nitrate)	Proposition 84- Rank 3	\$ 2,245,969	In pipeline under eligibility review.
5000273	002P	Gratton School	Feasibility Study for Arsenic Removal or Consolidation	Proposition 84- Rank 3	\$ 220,000	In pipeline to receive a funding agreement.

The California Rural Water Association (CRWA) is continuing to provide technical assistance to SWSs in Stanislaus County to complete the Drinking Water SRF 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.

File Maintenance

Section 64259 in Title 22-CCR states that each LPA shall establish and maintain an individual file for each small water system that includes the following information:

- Current water supply permit and technical report.
- Permit apps, permit tech reports and all tech reports supporting the water supply permits for a minimum of ten (10) years.
- Current plans and specifications pertaining to source information, treatment information, storage facilities, distribution plans, water quality plans, bacteriological bacteriological plans, emergency plans, etc.
- Copies of bacteriological water quality analyses for a minimum of five (5) years
- Copies of water quality monitoring data for a minimum of ten (10) years.
- Correspondence, memoranda, and other written records pertaining to the water system issued or written within the past three (3) years.
- Copies of all compliance orders, citations, court actions, and other enforcement documentation issued.

CDPH reviewed one (1) water system file (Frank Raines Park water system PWS No. 5000243) during the FY 10/11 annual evaluation and the file included the following based on the requirements in Section 64259. Also, included are items that the file were not found. Frank Raines Park is a surface water system that has a groundwater well that is under the direct influence of surface water (GWUDI) and serves a transient non-community population. The County is currently in the process to amend the water systems permit to approve a new treatment plant.

- Water supply permit with technical report dated May 20, 1993.
- Last inspection report dated July 2011 failed to report all eight elements that is required in a sanitary survey.
- SWTR testing and reporting requirements (pH, Cl₂ residual, NTU, water temperature, bacteriological readings) were included in the system file.
- Emergency Notification Plan (ENP) with no date, but included the plan of how the system will notify the public in the event of an emergency.
- Source chemical monitoring results were included in the file, but was not transferred to the CDPH water quality database (refer to Title 22, section 64469 for requirement).
- Backflow prevention assembly test report dated 9/8/2011 was included in the file.
- Pictures of the Do Not Drink public notices that are posted throughout the water system due to untreated surface water.
- Various correspondences were included in the file, including any enforcement actions that was issued to the water system.

THE COUNTY IS IN COMPLIANCE WITH APPENDIX F REQUIREMENTS: YES NO