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Director

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



ARNOLD SCHWARZENEGGER
Governor

June 20, 2008

Mr. Dwain Sanders, President
Western Hills Water District
9521 Morton Davis Drive
Patterson, CA 95363

TRANSMITTAL OF CITATION NO. 03-10-08C-001

The Western Hills Water District continues to deliver water to its customers with concentrations of Trihalomethanes (TTHMs) in violation of the MCL. The Department has issued several citations, enforcement letters, and a compliance order related to violations of the Disinfection By-Product regulations since 2004.

Although one change in the water system was implemented in 2006, that change only returned the system to compliance with the TTHM MCL for three quarters. Monitoring results since that time show that the TTHM MCL has been violated again during the past 3 quarters, and additional monitoring indicates that continuing water system operations without some significant changes will result in continuing violations of the TTHM standard.

The WHWD proposed aggressive flushing as a TTHM abatement strategy. Although the Department requested a copy of the flushing plan that would be used to facilitate a return to compliance, the WHWD did not reply. Reports indicate that flushing has been occurring for the past 3 months; however, monitoring results and the current mandate to conserve water do not indicate that flushing can be a viable compliance strategy.

Since the DBP precursor reduction study conducted by Veolia Water in late in 2005 showed that ferric chloride coagulant combined with Powdered Activated Carbon (PAC) adsorption of organic precursors provided the most significant level of DBP reduction, the Department is directing the WHWD to have the addition of PAC implemented as an interim TTHM reduction strategy until a change in the disinfection process can be permanently implemented. The Department regulates numerous water systems that use water from the California Aqueduct as a source water. All of those water systems chloraminate the finished water to prevent the development of high concentrations of TTHMs in the distribution system. Although the WHWD committed to prepare a design of a chloramination system, the Department has not received any plans for such a system to review. The Department believes that the experience of the other water

systems using the same raw water supply is an indicator that chloramination is necessary to return the WHWD water system to compliance with the TTHM MCL.

Since the WHWD has been remiss in responding to the Department's efforts to motivate the WHWD to abate the TTHM MCL violation, the current citation has been issued with an administrative penalty. If the WHWD continues to dismiss its responsibility to bring its water system into compliance, the Department will escalate its enforcement activities in response. Therefore, your cooperation in correcting the violation is imperative.

Enclosed with this citation is a form to be used in transmitting the administrative penalty to Perin Peebles in the Fee Unit.

Please respond to the Directives in the Citation by the deadlines established with each item. If you have any questions regarding this matter, contact Joe Spano at (209) 948 3816.

Cindy Forbes, P.E., Chief
Southern California Branch
Drinking Water Field Operations

Enclosures

Certified Mail No.: xxxx xxxx xxxx xxxx xxxx

