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**STATE OF CALIFORNIA  
DEPARTMENT OF PUBLIC HEALTH**

**IN RE: BSA CAMP KERN**  
Water System No. 1000157

**TO:** Ms. Dianna Zullo  
BSA Camp Kern  
2417 M Street  
Bakersfield, CA 93301

**CC:** Fresno County Division of Environmental Health

**CITATION FOR NONCOMPLIANCE  
TOTAL COLIFORM MAXIMUM CONTAMINANT LEVEL VIOLATION**

**July 2013**

**TOTAL COLIFORM MONITORING AND REPORTING**

**August 2013**

**Issued on December 12, 2013**

Section 116650, Chapter 4, Part 12, Division 104 of the California Health and Safety Code (CHSC), authorizes the issuance of a citation for failure to comply with a requirement of the California Safe Drinking Water Act, or any regulation, standard, permit, or order issued hereunder.

**VIOLATION**

The Drinking Water Field Operations Branch of the California Department of Public Health (hereinafter 'Department') hereby issues a Citation to BSA Camp Kern (hereinafter 'Water

1 System'), for failure to comply with Section 116555(a)(1) of the CHSC and Section  
2 64426.1(b)(2) of Title 22, California Code of Regulations (CCR). Specifically, the Water  
3

4 System (mailing address: 2417 M Street, Bakersfield, CA 93301) failed to comply with the  
5 total coliform Maximum Contaminant Level (MCL) for the month of July 2013.  
6

7 The Water System operates under a domestic water supply permit issued by the County of  
8 Fresno (hereinafter County) in January of 1999. BSA Camp Kern is a transient non-  
9 community water system serving a population of approximately three hundred (300)  
10 transient persons. The Department's records show that the operating season for the Water  
11 System is normally from June through September of each calendar year. The Department  
12 has taken on the task of tracking compliance as of September 1, 2007, since the County  
13 relinquished regulatory authority for public drinking water systems.  
14

15 Section 64426.1(b)(2) specifies that a public water system collecting fewer than 40 samples  
16 per month is in violation of the total coliform MCL when more than one sample collected  
17 during any month is total coliform-positive.  
18

19 The Water System is required to collect a minimum of one (1) distribution system  
20 bacteriological sample per quarter. The bacteriological water analysis results submitted by  
21 the Water System reported the presence of total coliform bacteria in twelve (12) of twenty  
22 (20) samples collected by the Water System in July 2013. None of the positive samples  
23 showed the presence of fecal coliform or *E. coli* bacteria.  
24  
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26  
27



1 The following table summarizes the bacteriological monitoring conducted during the  
 2 months of July and August of 2013.

4 5 6 7 8	Collection Date	Number of Samples	Sample Type	Number of TC positive	Number of E. Coli positive
6	7/8/2013	10	Routine, including 5 springs	10	0
7	7/10/2013	10	Other, including 5 springs	2 (Springs #2 & #3 only)	0
8	8/31/2013	0	No samples collected		

9  
 10 Due to the above-mentioned total coliform and *E. Coli* positive samples, the Water System  
 11 failed the total coliform MCL for the month of July 2013. All water samples for coliform  
 12 bacteria collected during July and August 2013 summarized in Attachment A.

13  
 14 The source of the contamination is believed to be the spring sources. Department staff  
 15 visited the Water System on July 24, 2013 and identified several sanitary defects in the  
 16 spring collection system. Prior to the Department's site visit, during reactivation in June  
 17 2013, the Water System determined that the spring sources had significantly reduced flow  
 18 to the point of being unable to meet the needs of BSA Camp Kern. At that time a booster  
 19 pump was installed at BSA Camp Oljato's staff latrine to draw from their domestic source.  
 20 The staff latrine is on the western most edge of Camp Oljato and is the point of Camp  
 21 Oljato's distribution system that is closest to Camp Kern. Approximately 3,500 feet of  
 22 HDPE pipe was laid from that booster pump across the forest floor to carry water to two  
 23 new storage tanks at Camp Kern. At that time, the well at Camp Oljato became Camp  
 24 Kern's primary source of water and is planned to remain so permanently.

25  
 26 The five routine samples required the month following a month with one or more total  
 27 coliform-positive samples were not collected in August 2013.



1  
2 The Groundwater Rule adopted by the Department, effective August 18, 2011, requires the  
3 collection of a sample for bacteriological evaluation from wells serving the system in  
4 response to a coliform positive distribution sample. This requirement was met with the  
5 round of repeat sampling conducted by the Water System in July of 2013.  
6

7 **ASSOCIATED VIOLATIONS**

8 Additionally, the Water System has failed to comply with the following Section 64424 of  
9 Title 22, CCR:  
10

11 Section 64424(d) specifies that if a public water system for which fewer than five routine  
12 samples per month are collected has one or more total coliform-positive samples, the water  
13 supplier shall collect at least five routine samples the following month. No samples were  
14 collected during August 2013.  
15

16 **NOTIFICATION REQUIREMENTS**

17 Section 64426.1(c) requires a public water system to notify the Department and the  
18 consumers of the water system, when a violation of Section 64426.1(b)(1) through (4)  
19 occurs. Notification to the Department shall be by the end of the business day on which the  
20 violation has been determined. If the Department is closed, notification shall be within 24  
21 hours of the determination. The Department was notified on July 10, 2013 by Fresno  
22 County Environmental Health.  
23

24 A Tier 2 Public Notice for violation of paragraph 64426.1(b) (2) shall be given pursuant to  
25 Section 64463.4 and 64465. The Tier 2 Public Notice shall include the mandatory health  
26 effects language from Appendix 64465-A for a total coliform MCL failure.  
27



1 Upon reactivation during the 2014 season, the Water System shall post the public  
2 notice provided as Attachment B in conspicuous locations within the water system.

3 Section 116450(g) requires that upon receipt of notification from a public water system,  
4 schools must notify school employees, students, and parents (if the students are minors),  
5 residential rental property owners or managers (including nursing homes and care facilities)  
6 must notify their tenants and business property owners, managers or operators must notify  
7 employees of businesses located on the property. These secondary notification requirements  
8 are included in the public notice.

9  
10 Proof of notification is required. The Water System shall complete Attachment C and return  
11 it to the Department by **June 30, 2014**.

12  
13 **DIRECTIVES**

14  
15 The Water System is hereby directed to take the following actions:

- 16  
17 1. By **June 15, 2014**, the BSA Camp Kern water system shall provide public  
18 notification of the total coliform Maximum Contaminant Level failure by posting  
19 the notice in conspicuous locations throughout the area served by the water system.

20  
21 By **Date** the Water System shall provide proof of public notification of the total  
22 coliform MCL violation by completing Attachment C and returning it to:

23  
24  
25 Betsy S. Lichti, Senior Sanitary Engineer  
26 Department of Public Health  
27 Drinking Water Field Operations Branch  
265 W. Bullard Avenue, Suite 101  
Fresno, CA 93704



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2. Whenever the Water System has one or more total coliform-positive samples in a given month, at least five (5) routine samples shall be collected the following month as required by Section 64424(d) and as discussed in this Citation.
  
3. The Water System shall notify the Department of any further violations of the total coliform MCL by the end of the business day on which the violation has been determined, or, if the Department is closed, within 24 hours of the determination.
  
4. Prior to reactivation of the water system, all service from the spring sources shall be severed and shall remain so until it is demonstrated that the spring water supply is bacteriologically safe.
  
5. Seasonal Reactivation requirements (Attachment D) shall be followed during startup in the spring of 2014.



**CIVIL PENALTIES**

Sections 116650(d) and 116650(e) of the CHSC allow for the assessment of a civil penalty for failure to comply with requirements of the California Safe Drinking Water Act. Failure to comply with any provision of this Citation may result in the Department imposing an administrative penalty of not less than \$100 (one hundred dollars) per day as of the date of violation of any provision of this Citation.

12/12/13  
Date

*Betsy S. Liehti*  
Betsy S. Liehti, P.E.  
Senior Sanitary Engineer, Fresno District  
DRINKING WATER FIELD OPERATIONS BRANCH



BSL/EL

Attachments:

- Attachment A: Summary of Bacteriological Samples collected in 2013
- Attachment B: Public Notice Template
- Attachment C: Proof of Notification Form
- Attachment D: Seasonal Reactivation Protocol

# Bacteriological Distribution Monitoring Report

**1000157 BSA/Camp Kern**
*Distribution System Freq: 1/Q*

Sample Date	Time	Location	T Coli	E Coli	F Coli	Type	CI2	Violation	Comment
3/31/2013		Closed for the Season							
7/8/2013	6:05	Upper Spring #1	P	A		Routine			
7/8/2013	6:15	Upper Spring #2	P	A		Routine			
7/8/2013	6:25	Upper Spring #3	P	A		Routine			
7/8/2013	6:40	1 ROU Main Tank	P	A		Routine			
7/8/2013	6:50	Lower Spring #2	P	A		Routine			
7/8/2013	7:00	Lower Spring #1	P	A		Routine			
7/8/2013	7:20	2 ROU West Latrine	P	A		Routine		MCL	
7/8/2013	7:45	3 ROU Mid Latrine	P	A		Routine			
7/8/2013	8:00	4 ROU East Latrine	P	A		Routine			
7/8/2013	8:15	5 ROU Kitchen	P	A		Routine			
7/10/2013	4:15	Upper Spring #1	A	A		Other			
7/10/2013	4:25	Upper Spring #2	P	A		Other			
7/10/2013	4:45	Upper Spring #3	P	A		Other			
7/10/2013	5:05	Lower Spring #2	A	A		Other			
7/10/2013	5:20	Lower Spring #1	A	A		Other			
7/10/2013	5:45	1 ROU Main Tank	A	A		Other			
7/10/2013	6:00	2 ROU West Latrine	A	A		Other			
7/10/2013	6:15	3 ROU Mid Latrine	A	A		Other			
7/10/2013	6:30	4 ROU East Latrine	A	A		Other			
7/10/2013	6:40	5 ROU Kitchen	A	A		Other			
8/31/2013		No Sample						MR4	

**Violation Key**

MCL	Exceeds the maximum contaminant level	MR5	Incorrect number of repeat samples as follow-up to a positive sample
MR1	No monthly sample for the report month	MR6	No source sample
MR2	No quarterly sample for the report month	MR7	No summary report submitted
MR3	Incorrect number of routine samples for the report month	MR8	Other comments and/or info
MR4	Did not collect 5 routine samples for previous month's positive sample	MR9	CI2 not reported

**IMPORTANT INFORMATION ABOUT YOUR DRINKING WATER**

Este informe contiene información muy importante sobre su agua potable.

Tradúzcalo o hable con alguien que lo entienda bien.

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**BSA Camp Kern Has Levels of Coliform Bacteria  
Above the Drinking Water Standard**

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Our water system recently failed a drinking water standard. Although this incident was not an emergency, as our customers, you have a right to know what you should do, what happened and what we did to correct this situation.

We routinely monitor for drinking water contaminants. We took 20 samples to test for the presence of coliform bacteria in July 2013. Twelve of these samples showed the presence of total coliform bacteria. The standard is that no more than one sample per month may show the presence of coliform bacteria.

**What should I do?**

- **You do not need to boil your water or take other corrective actions.**
- This is not an emergency. If it had been, you would have been notified immediately. Total coliform bacteria are generally not harmful themselves. *Coliforms are bacteria which are naturally present in the environment and are used as an indicator that other, potentially-harmful, bacteria may be present. Coliforms were found in more samples than allowed and this was a warning of potential problems.*
- Usually, coliforms are a sign that there could be a problem with the treatment or distribution system (pipes). Whenever we detect coliform bacteria in any sample, we do follow-up testing to see if other bacteria of greater concern, such as fecal coliform or *E. coli*, are present. **We did not find any of these bacteria in our subsequent testing.**
- People with severely compromised immune systems, infants, and some elderly may be at increased risk. These people should seek advice about drinking water from their health care providers. General guidelines on ways to lessen the risk of infection by microbes are available from EPA's Safe Drinking Water Hotline at 1(800) 426-4791.
- If you have other health issues concerning the consumption of this water, you may wish to consult your doctor.

**What happened? What is being done?**

[Describe corrective action]. \_\_\_\_\_  
\_\_\_\_\_.

For more information, please contact \_\_\_\_\_ [name of contact] at \_\_\_\_\_ [phone number] or \_\_\_\_\_ [mailing address].

*Please share this information with all the other people who drink this water, especially those who may not have received this notice directly (for example, people in apartments, nursing homes, schools, and businesses). You can do this by posting this public notice in a public place or distributing copies by hand or mail.*

**Secondary Notification Requirements**

Upon receipt of notification from a person operating a public water system, the following notification must be given within 10 days [Health and Safety Code Section 116450(g)]:

- **SCHOOLS:** Must notify school employees, students, and parents (if the students are minors).
- **RESIDENTIAL RENTAL PROPERTY OWNERS OR MANAGERS** (including nursing homes and care facilities): Must notify tenants.
- **BUSINESS PROPERTY OWNERS, MANAGERS, OR OPERATORS:** Must notify employees of businesses located on the property.

This notice is being sent to you by BSA Camp Kern

Date distributed: \_\_\_\_\_



RON CHAPMAN, MD, MPH  
Health Officer & Director

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



EDMUND G. BROWN JR.  
Governor

ATTACHMENT C

PROOF OF NOTIFICATION

(Return with copy of notice)

As required by Section 116450 of the California Health and Safety Code, I notified all users of water supplied by the **BSA Camp Kern** of the failure to meet the **total coliform bacteria MCL** for the month of **July 2013** as directed by the Department.

Notification was made on \_\_\_\_\_ by \_\_\_\_\_  
(date)

hand delivered and/or mailed and/or posted written notice.  
(circle all that apply)

\_\_\_\_\_  
Signature of Water System Representative

\_\_\_\_\_  
Printed Name

\_\_\_\_\_  
Date

DISCLOSURE: Be advised that Section 116725 and 116730 of the California Health and Safety Code state that any person who knowingly makes any false statement on any report or document submitted for the purpose of compliance with the attached order may be liable for a civil penalty not to exceed five thousand dollars (\$5,000) for separate violation for each day that violation continues. In addition, the violators may be prosecuted in criminal court and upon conviction, be punished by a fine of not more than \$25,000 for each day of violation, or be imprisoned in the county jail not to exceed one year, or by both the fine and imprisonment.

Due: June 30, 2014  
Total Coliform MCL Failure: July 2013  
System Number: 1000157  
Citation No.: 03-23-13C-055



Do your part to help California save energy. To learn more about saving energy, visit the following web site:  
<http://www.fypower.org>

Southern California Drinking Water Field Operations Branch  
265 W. Bullard Avenue, Suite 101, Fresno, CA 93704  
(559) 447-3300; Fax (559) 447-3304  
Internet Address: <http://www.dhs.ca.gov/ps/ddwem/>



RON CHAPMAN, MD, MPH  
Director & State Health Officer

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



EDMUND G. BROWN JR.  
Governor

**PROTOCOL FOR REACTIVATION OF SEASONAL WATER SYSTEMS**  
**DRINKING WATER FIELD OPERATIONS BRANCH**  
**May 2013**

**1. Disinfection of the Well and Distribution System**

The well shall be disinfected with enough chlorine to provide a chlorine residual of 5 mg/L in all parts of the distribution system. Swimming pool chlorine is not considered acceptable for disinfection purposes. Chlorine must be certified under NSF Standard 60 for use in drinking water systems. Use the following chart for determining how much chlorine to use to achieve a 5 mg/L residual:

Volume to be treated (gallons):	1,000	2,000	5,000	10,000	25,000	50,000	100,000	250,000
<b>Amount of Chlorine Solution to Use Based on Solution Strength</b>								
<b>5% Chlorine solution</b>	1 pint	1 quart	0.5 gal	1 gal	2.5 gal	5 gal	10 gal	25 gal
<b>12.5% Chlorine solution</b>	1 cup	1 pint	1 quart	0.5 gal	1 gal	2 gal	4 gal	10 gal

The chlorine shall be held in the distribution system for at least 24 hours. The system should then be flushed till no chlorine is detectable in the system.

**2. Bacteriological Monitoring**

Following the disinfection process and flushing of the distribution system, water samples shall be collected directly from each well discharge and from the distribution system at the five routine sample sites to be analyzed for total coliform bacteria. The samples should be labeled as "special" samples. The disinfection and sampling process shall be repeated until samples from both the well and distribution system are negative for total coliform bacteria. Any distribution sample shall be collected at locations identified as "routine" sample sites on the system's approved Bacteriological Sample Siting Plan.

**3. Ongoing Bacteriological Monitoring**

The first routine samples to be collected for compliance with the monitoring requirements of the Total Coliform Rule **shall be collected one week after the facility is open to the public.** This monitoring shall continue either monthly or quarterly as specified in the approved Bacteriological Sample Siting Plan. All results shall be reported to the Department at the following address by the 10<sup>th</sup> day of the month following sample collection:

Betsy S. Lichti, P.E.  
Senior Sanitary Engineer, Fresno District  
California Department of Public Health  
265 W. Bullard Avenue, Suite 101  
Fresno, CA 93704

If the water system has any questions regarding the procedure outlined above with regards to the activation of their seasonal water systems, they may contact the CDPH Drinking Water Field Operations Branch, Fresno District staff at (559) 447-3300.