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116650. Citations

- a) *If the Department determines that a public water system is in violation of this chapter or any regulation, permit, standard, citation, or order issued or adopted thereunder, the Department may issue a citation to the public water system. The citation shall be served upon the public water system personally or by certified mail. Service shall be deemed effective as of the date of personal service or the date of receipt of the certified mail. If a person to whom a citation is directed refuses to accept delivery of the certified mail, the date of service shall be deemed to be the date of mailing.*
  
- b) *Each citation shall be in writing and shall describe the nature of the violation or violations, including a reference to the statutory provision, standard, order, citation, permit, or regulation alleged to have been violated.*
  
- c) *A citation may specify a date for elimination or correction of the condition constituting the violation.*
  
- d) *A citation may include the assessment of a penalty as specified in subdivision (e).*
  
- e) *The Department may assess a penalty in an amount not to exceed one thousand dollars (\$1,000) per day for each day that a violation occurred, and for each day that a violation continues to occur. A separate penalty may be assessed for each violation.*

1 Provision 11 of the Domestic Water Supply Permit No. 04-15-01P-005 issued by the  
2 Department to the City on April 6, 2001 provides:

3  
4 Provision 11

5  
6 *Samples from the effluent of the 4 MG reservoir shall be analyzed weekly for PCE. In*  
7 *addition, raw water samples from Well Nos. 13, 14, 18, and 19 shall be analyzed*  
8 *monthly for PCE. The City shall arrange with the laboratory to receive the analytical*  
9 *results within two (2) weeks of sampling.*

10  
11 **STATEMENT OF FACTS**

12  
13 **Background**

14 The City is currently operating under the authority of Permit No. 04-15-01P-005 issued  
15 on April 6, 2001, and five permit amendments issued on September 10, 2003, March  
16 16, 2007, June 30, 2009, May 19, 2011, and September 4, 2012. The City is located  
17 in the urbanized area of southern Los Angeles, bordering by the cities of Huntington  
18 Park, Cudahy, Bell, and Bell Garden to the north; Downey to the east; Lynwood to the  
19 south; and Paramount to the southeast. The City was incorporated in 1923,  
20 encompassing an area of 7.4 square miles. The City's water system serves 85  
21 percent of the area within the City boundary. The water system serves an estimated  
22 population of 98,434 people through approximate 16,500 active service connections.  
23 The Hollydale area in the City is served by the Golden State Water Company (GSWC)  
24 – Hollydale System.

25  
26 The City's water system consists of six active wells, four standby wells, seven  
27 reservoirs (six are active and one is not in use due to seismic concern), and three

1 booster stations. The total capacity of the six active wells is approximately 21 million  
2 gallons per day (MGD). The total storage capacity of the six reservoirs in active use is  
3 13.02 million gallons (MG) and the total capacity of the booster pumps is  
4 approximately 34 MGD. The City has two connections with the Metropolitan Water  
5 District of Southern California (MWDSC), CB-7 and CB-11. Each connection consists  
6 of a 16-inch outlet from MWDSC's Middle Cross Feeder. The outlets branch into two  
7 10-inch parallel lines. Each connection has a rated capacity of 15 cfs, but the required  
8 pressure-reduction settings restrict actual capacity for CB-7 and CB-11 to 4.25 cfs and  
9 2.9 cfs, respectively. Prior to 1989, the City used MWDSC water to supplement well  
10 production during summer months. Since then, the MWDSC connections have not  
11 been used, but remain available for emergency or future use. The City also has five  
12 emergency connections, one connection each with the following water systems: the  
13 City of Downey, City of Lynwood, Walnut Park Mutual Water Company, City of  
14 Huntington Park, and GSWC-Hollydale System.

15  
16 Wells 13, 14, 18, and 19 are contaminated with volatile organic chemicals (VOCs),  
17 mainly tetrachloroethylene (PCE), at levels exceeding the MCL. The City utilizes the  
18 spray aeration system installed in South Gate Park Reservoir, a 4-MG subsurface  
19 concrete reservoir to remove VOCs from the water produced by these wells. As  
20 required by Permit No. 04-15-01P-005, the City must conduct monthly PCE monitoring  
21 at the wells and weekly PCE monitoring at the effluent of South Gate Park Reservoir.

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1     **Summary of Events**

2  
3     2007

4     The City failed to collect PCE sample from the effluent of South Gate Park Reservoir  
5     during the week of September 9, 2007. The Department issued a warning letter in  
6     November 2007 (Attachment 1).

7  
8     2008

9     The City failed to collect PCE sample from Wells 13, 14, and 18 in February 2008. As  
10    a result, the Department issued a notice of violation dated March 13, 2008 to the City  
11    (Attachment 2).

12  
13    Again, the City did not collect PCE sample from effluent of South Gate Park Reservoir  
14    during the week of October 13, 2008. A meeting was held between the  
15    representatives of the City and the Department on December 11, 2008 to discuss this  
16    violation and the needed improvements. On January 20, 2009, the Department  
17    issued a second notice of violation letter to the City (Attachment 3).

18  
19    2010

20    The City failed to comply with the Ground Water Rule (GWR) monitoring requirement  
21    for not conducting triggered source monitoring within 24 hours being notified of a  
22    routine total coliform-positive sample in August 2010. A notice of violation letter was  
23    issued by the Department to the City on October 11, 2010.

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1     2012

2     The City again failed to collect the triggered source water samples within 24 hours of  
3     notification of the total coliform-positive sample on August 29, 2012. This is the  
4     second time that the City failed to comply with the Ground Water Rule (GWR)  
5     monitoring requirement. As a result, a Citation (Citation No. 04-22-12C-052) was  
6     issued to the City on October 11, 2012, directing the City to improve its water quality  
7     monitoring program and provide trainings to staff with the duty of overseeing the water  
8     quality monitoring and reporting compliance.

9  
10    June 2013

11    Mr. Ron Hernandez, Water Operations Foreman of the City, informed the Department  
12    on June 10, 2013, that the City had failed to collect PCE sample from the effluent of  
13    South Gate Park Reservoir during the week of May 13, 2013.

14  
15    The City sent a letter dated June 11, 2013 to the Department, explaining the operator  
16    in charge of the sampling duty had been preoccupied installing a fire hydrant at Well  
17    13 and had forgotten the sampling duty. The same operator was involved in the  
18    missing sample event in October 2008. In the letter, the City indicated it had removed  
19    the operator from the sampling duty and would take further disciplinary measures.  
20    The operator's supervisor was under internal investigation and may face disciplinary  
21    action depending upon the findings of investigation. The supervisor was directed to  
22    submit a weekly, monthly, quarterly check list of sample plan and the Interim Water  
23    Division Manager will review and sign off the check lists, until a level of consistency is  
24    upheld.

25  
26    To comply with Citation No. 04-22-12C-052, the City sent a letter dated June 26, 2013  
27    to the Department, listing similar enhancement measures to the City's water quality

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monitoring program and trainings that have been provided to operators (Attachment 4).

**DETERMINATIONS**

The Department has determined that the City was in violation of Provision 11 of the Domestic Water Supply Permit No. 04-15-01P-005 in May 2013, due to the failure to collect weekly PCE sample from the effluent of South Gate Park Reservoir during the week of May 13, 2013.

**DIRECTIVES**

The City of South Gate is hereby directed to take the following actions:

1. Prepare a Comprehensive Water Quality Sampling Plan (Plan) and submit the Plan to the Department by **November 30, 2013**. The Plan shall include all source and distribution system monitoring required by Title 22, California Code of Regulations. In addition, the Plan shall include monitoring requirements specified under the City's domestic water supply permit and permit amendments. Constituents to be addressed in the Plan shall include bacteriological quality, inorganic chemicals, organic chemicals, disinfectants and disinfection byproducts, radionuclides, general mineral and general physical parameters. The Plan shall specify sampling frequency and analytical method for each constituent. If some of the sampling duties are contracted out, the Plan shall describe the duties of the contractors and communication protocol between the City and the contractors. For constituents with specific regulatory requirements of how a monitoring plan shall be prepared, the City may attach

1 the specific plans, such as the Bacteriological Sample Siting Plan, Stage 2  
2 Disinfectants and Disinfection By Products Rule Monitoring Plan etc. that have  
3 been previously approved by the Department to the Plan. The City shall submit  
4 an updated Plan to the Department at any time the Plan no longer ensures  
5 representative monitoring of the system or in response to new regulations or  
6 permit requirements.

7  
8 2. The City shall review the Comprehensive Water Quality Sampling Plan  
9 approved by the Department periodically with the staff responsible for the  
10 sample collecting duty. **Within 60 days of receiving an approval letter for**  
11 **the Plan from the Department**, the City shall submit a letter listing date(s) of  
12 such a review meeting and the names of the participants.

13  
14 3. The City shall provide on-going training to staff responsible for overseeing the  
15 compliance with monitoring and reporting requirements and staff responsible  
16 for sample collection duties. By **January 31, 2014**, the City shall submit a letter  
17 listing the names of the trainees, contents of the training sections (courses),  
18 and dates and locations of these training sections provided. If in-house training  
19 is used, information regarding the experiences and qualifications of the  
20 instructors shall also be provided. The training courses must be related to  
21 water quality monitoring, reporting and notification regulations.

22  
23 4. The City shall implement the water quality monitoring program enhancement  
24 measures listed in the City's June 26, 2013, letter promptly. The City shall  
25 submit the check lists of sample plan that have been signed off by the sampler,  
26 the sampler's supervisor and the Water Division Manager to the Department  
27 **every 3 months for the next 12 months**, with the first submittal due

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**December 10, 2013.** In addition, the City shall make the check lists available for review by the Department during sanitary surveys.

The Department reserves the right to make modifications to this Citation, as it may deem necessary to protect public health and safety. Such modifications may be issued as amendments to this Citation and shall be effective upon issuance.

Nothing in this Citation relieves the City of South Gate of its obligation to meet the requirements of H & S Code, Division 104, Part 12, Chapter 4 (California Safe Drinking Water Act), or any regulation, permit, standard or order issued or adopted thereunder.

The items required in Directives 1, 2, 3 and 4 shall be submitted to:

Shu-Fang Orr, P.E.  
District Engineer, Angeles District  
Southern California Drinking Water Field Operations Branch  
500 North Central Avenue, Suite 500  
Glendale, CA 91203

**PARTIES BOUND**

This Citation shall apply to and be binding upon the City of South Gate, its officers, directors, agents, employees, contractors, successors, and assignees.

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**SEVERABILITY**

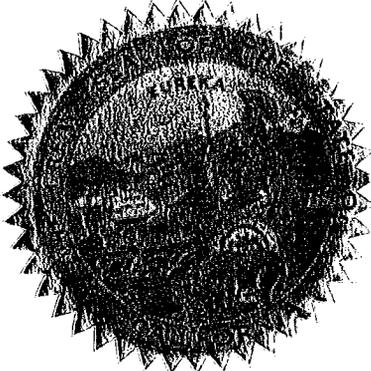
The directives of this Citation are severable, and the City of South Gate shall comply with each and every provision thereof notwithstanding the effectiveness of any provision.

**FURTHER ENFORCEMENT ACTION**

Division 104, Part 12, Chapter 4, (commencing with Section 116270) of the H & S Code authorizes the Department to: issue additional citations with assessment of penalties if the City of South Gate continues to fail to correct a violation identified in a citation; take action to suspend or revoke a permit that has been issued to a public water system if the system has violated applicable law or regulations or has failed to comply with orders of the Department; and petition the superior court to take various enforcement measures against a public water system that has failed to comply with orders of the Department. The Department does not waive any further enforcement action by issuance of this Citation.

August 5, 2013  
Date

Shu-Fang Orr  
Shu-Fang Orr, P.E.  
District Engineer  
Angeles District



Attachments (4):

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1. Warning Letter dated November 1, 2007
2. March 13, 2008, Notice of Violation Letter
3. January 20, 2009, Notice of Violation Letter
4. The City's letter to the Department dated June 26, 2013 (w/o Enclosures)

Warning Letter dated November 1, 2007



MARK B HORTON, MD, MSPH  
Director

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



ARNOLD SCHWARZENEGGER  
Governor

November 1, 2007

Mr. John E. Chambers  
Water Division Manager  
City of South Gate  
4244 Santa Ana Ave.  
South Gate, CA 90280.

**SYSTEM NO. 1910152— VIOLATION OF THE SOUTH GATE PARK SPRAY  
AERATION FACILITY TETRACHLOROETHYLENE (PCE) MONITORING  
REQUIREMENT IN SEPTEMBER 2007**

Dear Mr. Chambers:

It has come to the Department's attention that the City of South Gate (City) did not collect a PCE sample from the effluent of the South Gate Park Reservoir during the week of September 9, 2007. Provision 11 of the Domestic Water Supply Permit No. 04-15-01P-005 issued by the Department to the City on April 6, 2001 requires the City to monitor the effluent of the 4-MG South Gate Park Reservoir for PCE weekly (Enclosure 1).

Based on the review of the September 2007 Volatile Organic Chemical Compliance Report and attachments submitted by the City, the City collected a total of three PCE samples in September (September 4, 18, and 25, 2007) from the reservoir effluent (Enclosure 2).

Upon inquiry, Mr. Ron Hernandez, Water Production Foreman of the City, responded to the Department in an email dated October 24, 2007 that the City was unable to collect the weekly PCE sample on September 11, 2007, scheduled sample date, due to running out of the VOC vials (Enclosure 3).

The City should have planned ahead and collected the sample as scheduled. Missing sample collection due to lack of VOC vials demonstrates the poor planning on the City's part. In addition, if the City cannot collect samples as scheduled due to mistakes or

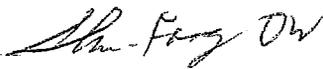
Mr. John E. Chambers  
Page 2  
November 1, 2007

circumstances beyond the City's control, the City should notify the Department and collect replacement samples as soon as possible. This step did not occur.

The City must cease violating Provision 11 of the Domestic Water Supply Permit No. 04-15-01P-005 immediately. Please be advised that if the City fails the monitoring requirement again, the Department will take formal enforcement action.

If you have any questions regarding this letter, please contact Thomas Tsui at (213) 580-5736 or me at (213) 580-5702.

Sincerely,



Shu-Fang Orr, P.E.  
District Engineer  
Angeles District

Enclosures: 1. Excerpts from Permit 04-15-01P-005  
2. September 2007 Volatile Organic Chemical Compliance Report  
3. Email from Ron Hernandez dated October 24, 2007

cc: David Torres  
Field Operations Manager  
City of South Gate  
4244 Santa Ana Ave.  
South Gate, CA 90280.

Mr. John E. Chambers  
Page 3  
November 1, 2007

bcc: System 1910152 – Correspondence (with Enclosure)  
Region (with Enclosure)  
District (with Enclosure)  
Reading (with Enclosure)  
Thomas – PICME (with Enclosure)

1910152 violation of pce monitoring  
SO/TT

Enclosure 1

7. No changes, additions, or modifications shall be made to the sources or treatment in Provision Nos. 4 and 6 unless an amended water permit has first been obtained from the Department.

#### **SOUTH GATE PARK SPRAY AERATION FACILITY**

8. All water served by the South Gate Park treatment facility shall, at all times, meet all maximum contaminant levels and action levels established by this Department.
9. The water from Well Nos. 13, 14, 18, and 19, shall be at all times treated and shall not bypass the reservoir. The aeration system shall be operated continuously.
10. All aeration and disinfection equipment shall be maintained according to the design engineer's and manufacturer's specifications.
11. Samples from the effluent of the 4 MG reservoir shall be analyzed weekly for PCE. In addition, raw water samples from Well Nos. 13, 14, 18, and 19 shall be analyzed monthly for PCE. The City shall arrange with the laboratory to receive the analytical results within two (2) weeks of sampling.
12. The reservoir effluent shall be continuously and reliably chlorinated prior to entering the distribution system such that the residual shall be above 0.2 mg/L. Since chlorine demand fluctuates, it is recommended that the City dose at least to 0.50 mg/L or higher, to be able to maintain the 0.20 mg/L requirement.
13. All analytical results shall be reported on the attached "South Gate Park Treatment Plant Monitoring Report" and submitted by the 10<sup>th</sup> day of the following month to the Department along with daily operational records including, as a minimum, flow rates, total volume treated, daily chlorine residuals, operational changes and unusual occurrences shall be maintained.
14. The City shall not use recycled water, fertilizers, pesticides, or herbicides in the park where Well Nos. 13, 14, 18, and 19 are located without prior approval of this Department.
15. Rain water or the water from the sprinklers in the landscaped areas above the reservoir shall not rise to six (6) inches above ground which is the lowest point of the air filters of aeration system. The sprinklers must always be sized and positioned so that they do not spray water on the filters.

#### **GROUNDWATER SUPPLIES**

16. Well Nos. 2 and 24 – The City shall notify the Department when Well No. 2 and Well No. 24 are ready to be placed back into service. The wells will need to be

Enclosure 2

# CITY OF SOUTH GATE

## Volatile Organic Chemical Compliance Report

Month SEPTEMBER

Year 2007

WELL	CAPACITY (GPM)	NO. OF DAYS OF OPERATION	COMMENTS OR PROBLEMS
13	2160	2	NONE
14	3349	30	NONE
18	1500	30	NONE
19	2536	3	NONE

### Weekly PCE Monitoring - Reservoir Effluent

WEEK	FLOW	EFFLUENT	COMPLIANCE	MODIFICATION TO TREATMENT
1	5500	1.27ug/L	YES	NONE
2	4500	NOT SAMPLED		
3	4500	1.39ug/L	YES	NONE
4	4500	0.87ug/L	YES	NONE
5				

### Monthly PCE Monitoring - Source Sampling

WELL	DATE OF COLLECTION	RESULTS
13	9-5-07	5.08ug/L
14	9-5-07	2.51ug/L
18	9-5-07	7.71ug/L
19	9-5-07	2.47ug/L



Our Experience Is Your Protection

# Michelson Laboratories, Inc.

6280 Chalet Drive, Commerce, California 90040-3761, Telephone (562) 928-0553 / FAX (562) 927-6625

RECEIVED  
LABORATORY  
10/9/2007

## LABORATORY CERTIFICATE

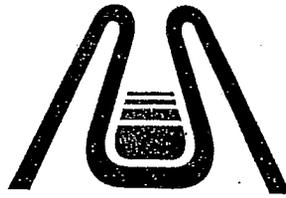
Submitted By: CITY OF SOUTH GATE  
DEPARTMENT OF PUBLIC WORKS  
4244 SANTA ANA ST.  
SOUTH GATE, CA 90280  
Attn :MR. HERNANDEZ

Date: 10/09/2007  
Lab No. : 090407-C37007  
Report No. : 090407-C37007A  
Order No. :  
Received : 9/4/2007  
Page : 1 of 1

REPORT #	PRODUCT / TEST	METHOD	RESULT	DET LIMIT	UNITS	START:DT
C37007-01	Product .PARK RESERVOIR TREATED WATER 9/4/07 0845 PCE (Tetrachloroethene)	EPA 524.2	1.27	0.08	ug/L	09/20/07

## MICHELSON LABORATORIES, INC.

Stephen Roesch, M.S., Laboratory Director | 10/9/2007 8:58:45 AM



Our Experience Is Your Protection

# Michelson Laboratories, Inc.

6280 Chalet Drive, Commerce, California 90040-3761 Telephone: (562) 928-0553 / FAX (562) 927-6625

RECEIVED  
DEPT. OF HEALTH  
DWFOB-LOG

## LABORATORY CERTIFICATE

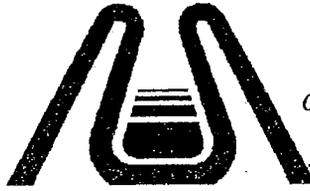
Submitted By: CITY OF SOUTH GATE  
DEPARTMENT OF PUBLIC WORKS  
4244 SANTA ANA ST.  
SOUTH GATE, CA 90280  
Attn :MR. HERNANDEZ

Date: 09/21/2007  
Lab No. : 091807-C37486  
Report No. : 091807-C37486A  
Order No. :  
Received : ~~09/18/2007~~  
Page : 1 of 1

REPORT #	PRODUCT / TEST	METHOD	RESULT	DET LIMIT	UNITS	START:DT
C37486-01	Product :WATER - PARK RESERVOIR TREATED WATER PCE (Tetrachloroelhene)	EPA 524.2	1.39	0.08	ug/L	09/20/07

### MICHELSON LABORATORIES, INC.

Stephen Roesch, M.S., Laboratory Director | 9/21/2007 2:32:38 PM JC



Our Experience Is Your Protection

## Michelson Laboratories, Inc.

6280 Chalet Drive, Commerce, California 90040-3761, Telephone (562) 928-0553 / FAX (562) 927-6625

### LABORATORY CERTIFICATE

Submitted By: CITY OF SOUTH GATE  
DEPARTMENT OF PUBLIC WORKS  
4244 SANTA ANA ST.  
SOUTH GATE, CA 90280  
Attn :MR. HERNANDEZ

Date: 10/10/2007  
Lab No. : 092507-C37772  
Report No. : 092507-C37772A  
Order No. :  
Received : 10/25/2007  
Page : 1 of 1

REPORT #	PRODUCT / TEST	METHOD	RESULT	DET LIMIT	UNITS	START:DT
C37772-01	Product :PARK RESERVOIR TREATED WATER - 9/25/07 9.15 PCE (Tetrachloroethene)	EPA 524.2	0.87	0.08	ug/L	10/04/07

MICHELSON LABORATORIES, INC.

Stephen Roesch, M.S., Laboratory Director | 10/10/2007 8:49:22 AM

Enclosure 3

**Tsui, Thomas (CDPH-DDWEM)**

---

**From:** Lopez, Cecilia (CDPH-DDWEM)  
**Sent:** Wednesday, October 24, 2007 11:12 AM  
**To:** Tsui, Thomas (CDPH-DDWEM)  
**Cc:** 'Ron Hernandez'  
**Subject:** Reason - Missing PCE and Well Conform Analysis

FYI

---

**From:** Ron Hernandez [mailto:rhernandez@sogate.org]  
**Sent:** Wednesday, October 24, 2007 10:45 AM  
**To:** Lopez, Cecilia (CDPH-DDWEM)  
**Subject:** Missing PCE and Well Conform Analysis

The reason for the Park Reservoir Treated effluent not being sampled on 9-11, was that we ran out of VOC vials. Well 26 was not sampled for total coliforms due to dead batteries and a blown battery charger fuse on the Waukesha engine that drives the well. As far as well 28 not being sampled on 9-11-07, my operator forgot to sample this well. I directed that these wells be sampled immediately on 10-2-07, in addition the Park Reservoir Treated Effluent was routinely sampled on 10-3-07. I will fax these results over by 11:00 this morning.

10/24/2007

March 13, 2008, Notice of Violation Letter

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



MARK B HORTON, MD, MSPH  
Director



ARNOLD SCHWARZENEGGER  
Governor

March 13, 2008

Mr. John E. Chambers  
Water Division Manager  
City of South Gate  
4244 Santa Ana Ave.  
South Gate, CA 90280.

**SYSTEM NO. 1910152 – VIOLATION OF THE SOUTH GATE PARK SPRAY  
AERATION FACILITY TETRACHLOROETHYLENE (PCE) MONITORING  
REQUIREMENT IN FEBRUARY 2008**

Dear Mr. Chambers:

On March 11, 2008, Mr. Ron Hernandez, Water Production Foreman of the City, called Mr. Thomas Tsui, Sanitary Engineer with this Department and informed Mr. Tsui that the City of South Gate (City) had forgotten to collect the monthly raw water samples for the South Gate Park Spray Aeration Facility during the first week of February. Based on the review of the February 2008 Volatile Organic Chemical Compliance Report and attachments submitted by the City, the City did not collect PCE samples in February 2008 from Wells 13, 14 and 18. Provision 11 of the Domestic Water Supply Permit No. 04-15-01P-005 issued by the Department to the City on April 6, 2001 requires the City to monitor the raw water from Wells 13, 14, 18 and 19 for PCE monthly (Enclosure 1). Well 19 was offline in February 2008 (Enclosure 2).

This is the second time in recent months that the City did not collect all the required PCE samples for the above treatment facility. In November 2007, the Department sent a warning letter to the City for missing a PCE sample from the effluent of South Gate Park Reservoir during the week of September 9, 2007.

If the City had reviewed the monitoring results on a regular basis, the City would have realized the mistake and been able to collect the make-up samples before the end of the month.

Mr. John E. Chambers  
Page 2  
March 13, 2008

The City must cease violating Provision 11 of the Domestic Water Supply Permit No. 04-15-01P-005 immediately. **Please be advised that a citation will be issued to the City if the City fails the monitoring requirement again.**

If you have any questions regarding this letter, please contact Mr. Tsui at (213) 580-5736 or me at (213) 580-5702.

Sincerely,



Shu-Fang Orr, P.E.  
District Engineer  
Angeles District

Enclosures: 1. Excerpts from Permit 04-15-01P-005  
2. February 2008 Volatile Organic Chemical Compliance Report

cc: David Torres  
Field Operations Manager  
City of South Gate  
4244 Santa Ana Ave.  
South Gate, CA 90280.

Mr. John E. Chambers  
Page 3  
March 13, 2008

bcc: System 1910152 – Correspondence (with Enclosure)  
Region (with Enclosure)  
District (with Enclosure)  
Reading (with Enclosure)  
Thomas – PICME (with Enclosure)

1910152 violation of pce monitoring 2  
SO/TT

**ENCLOSURE 1**

7. No changes, additions, or modifications shall be made to the sources or treatment in Provision Nos. 4 and 6 unless an amended water permit has first been obtained from the Department.

#### **SOUTH GATE PARK SPRAY AERATION FACILITY**

8. All water served by the South Gate Park treatment facility shall, at all times, meet all maximum contaminant levels and action levels established by this Department.
9. The water from Well Nos. 13, 14, 18, and 19, shall be at all times treated and shall not bypass the reservoir. The aeration system shall be operated continuously.
10. All aeration and disinfection equipment shall be maintained according to the design engineer's and manufacturer's specifications.
11. Samples from the effluent of the 4 MG reservoir shall be analyzed weekly for PCE. In addition, raw water samples from Well Nos. 13, 14, 18, and 19 shall be analyzed monthly for PCE. The City shall arrange with the laboratory to receive the analytical results within two (2) weeks of sampling.
12. The reservoir effluent shall be continuously and reliably chlorinated prior to entering the distribution system such that the residual shall be above 0.2 mg/L. Since chlorine demand fluctuates, it is recommended that the City dose at least to 0.50 mg/L or higher, to be able to maintain the 0.20 mg/L requirement.
13. All analytical results shall be reported on the attached "South Gate Park Treatment Plant Monitoring Report" and submitted by the 10<sup>th</sup> day of the following month to the Department along with daily operational records including, as a minimum, flow rates, total volume treated, daily chlorine residuals, operational changes and unusual occurrences shall be maintained.
14. The City shall not use recycled water, fertilizers, pesticides, or herbicides in the park where Well Nos. 13, 14, 18, and 19 are located without prior approval of this Department.
15. Rain water or the water from the sprinklers in the landscaped areas above the reservoir shall not rise to six (6) inches above ground which is the lowest point of the air filters of aeration system. The sprinklers must always be sized and positioned so that they do not spray water on the filters.

#### **GROUNDWATER SUPPLIES**

16. Well Nos. 2 and 24 – The City shall notify the Department when Well No. 2 and Well No. 24 are ready to be placed back into service. The wells will need to be

**ENCLOSURE 2**

# CITY OF SOUTH GATE



## Volatile Organic Chemical Compliance Report

Month FEBRUARY

Year 2008

WELL	CAPACITY (GPM)	NO. OF DAYS OF OPERATION	COMMENTS OR PROBLEMS
13	2160	1	NONE
14	3349	29	NONE
18	1500	29	NONE
19	2536	1	WELL OUT OF SERVICE. PUMP AND MOTOR PULLED

### Weekly PCE Monitoring - Reservoir Effluent

WEEK	FLOW	EFFLUENT	COMPLIANCE	MODIFICATION TO TREATMENT
1	4200	2.78ug/L	YES	NONE
2	4200	1.3ug/L	YES	NONE
3	4200	1.2ug/L	YES	NONE
4	4200	0.85ug/L	YES	NONE
5				

### Monthly PCE Monitoring - Source Sampling

WELL	DATE OF COLLECTION	RESULTS
13		N/S
14		N/S
18		N/S
19		WELL OUT OF SERVICE

January 20, 2009, Notice of Violation Letter



MARK B HORTON, MD, MSPH  
Director

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



ARNOLD SCHWARZENEGGER  
Governor

January 20, 2009

Mr. John E. Chambers  
Water Division Manager  
City of South Gate  
4244 Santa Ana Ave.  
South Gate, CA 90280.

Dear Mr. Chambers:

**SYSTEM NO. 1910152 – VIOLATION OF THE SOUTH GATE PARK SPRAY  
AERATION FACILITY TETRACHLOROETHYLENE (PCE) MONITORING  
REQUIREMENT IN OCTOBER 2008**

It has come to the Department's attention that the City of South Gate (City) did not collect a PCE sample from the effluent of the South Gate Park Reservoir during the week of October 13, 2008 (Enclosure 1). Provision 11 of the Domestic Water Supply Permit No. 04-15-01P-005 issued by the Department to the City on April 6, 2001 requires the City to monitor the effluent of the 4-MG South Gate Park Reservoir for PCE weekly.

This is the third time since September 2007 that the City had failed to collect all the required PCE samples for the above treatment facility. In November 2007, the Department sent a warning letter to the City for missing a PCE sample from the effluent of South Gate Park Reservoir during the week of September 9, 2007 (Enclosure 2). In March 2008, the Department sent the second warning letter to the City for failing to collect the monthly raw water samples for the South Gate Park Spray Aeration Facility during the first week of February 2008 (Enclosure 3).

A meeting was held at the Department's Los Angeles Office between the representatives of the City and the Department on December 11, 2008. The participants to the meeting included Mr. David Torres, Field Operations Manager, Mr. Ramiro Hernandez, Water Production Foreman, Mr. Chris Castillo, Water Distribution Forman and you from the City and Mr. Cliff Tien-Tsu Cheng, Associate Sanitary Engineer and me from the Department. During the meeting, the representatives of the

Mr. John E. Chambers  
Page 2  
January 20, 2009

City expressed deep regret about the repeating errors. The City has taken disciplinary action against the operator who had neglected the duty and instituted a new tracking system to ensure all samples are collected as required. In light of the City's efforts and remedial actions, the Department has decided to give the City one more chance. **Please be advised that the Department will promptly issue a citation against the City, if the City fails the monitoring requirement again.**

If you have any questions regarding this letter, please contact Mr. Cheng at (213) 580-5740 or me at (213) 580-5702.

Sincerely,



Shu-Fang Orr, P.E.  
District Engineer  
Angeles District

Enclosures: 1. October 2008 Volatile Organic Chemical Compliance Report  
2. November 2007 Letter to the City – first warning  
3. March 2008 Letter to the City – second warning

cc: David Torres  
Field Operations Manager  
City of South Gate  
4244 Santa Ana Ave.  
South Gate, CA 90280.

Mr. John E. Chambers  
Page 3  
January 20, 2009

bcc: System 1910152 – Correspondence (with Enclosure)  
Region (with Enclosure)  
District (with Enclosure)  
Reading (with Enclosure)  
Cliff – PICME (with Enclosure)

PCE Monitoring Violation 3-South Gate 152  
SO/CC

ENCLOSURE 1

October 2008 VOC Compliance Report

# CITY OF SOUTH GATE

## Volatile Organic Chemical Compliance Report

Month      OCTOBER

Year                     

2008

WELL	CAPACITY (GPM)	No. OF DAYS OF OPERATION	COMMENTS OR PROBLEMS
13	0.196 1800	2	NONE
14	0.365 3349	31	NONE
18	0.163 1500	2	NONE
19	0.296 2536	31	BLOWER MOTOR BURNED OUT

9185

Park.

### Weekly PCE Monitoring - Reservoir Effluent /PS Code/

Date Collect.	FLOW	EFFLUENT	COMPLIANCE	MODIFICATION TO TREATMENT
10/17/08 #####	4500	1.56ug/L ✓	YES	NONE
NS	4500			
10/23 #####	4500	2.53ug/L ✓	YES	NONE
10/29 #####	4500	1.70ug/L ✓	YES	NONE
10/2/08		2.04		

### Monthly PCE Monitoring - Source Sampling

WELL	DATE OF COLLECTION	RESULTS
13	10/2 <del>10/7</del> /2008 (10/17/08)	3.97ug/L ✓ (7.59)
14 ✓	10/2 <del>10/7</del> /2008 (10/17/08)	1.54ug/L ✓ (1.23)
18 ✓	10/2 <del>10/7</del> /2008 (10/17/08)	2.56ug/L ✓ (3.51)
19	10/2 <del>10/7</del> /2008 (10/17/08)	3.07ug/L ✓ (3.01)

**Comments:**

→ What happen to the week 10/13-17?  
(NS means?)



ENCLOSURE 2

First Warning Letter to the City  
November 1, 2007



MARK B HORTON, MD, MSPH  
Director

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



ARNOLD SCHWARZENEGGER  
Governor

November 1, 2007

Mr. John E. Chambers  
Water Division Manager  
City of South Gate  
4244 Santa Ana Ave.  
South Gate, CA 90280.

**SYSTEM NO. 1910152— VIOLATION OF THE SOUTH GATE PARK SPRAY  
AERATION FACILITY TETRACHLOROETHYLENE (PCE) MONITORING  
REQUIREMENT IN SEPTEMBER 2007**

Dear Mr. Chambers:

It has come to the Department's attention that the City of South Gate (City) did not collect a PCE sample from the effluent of the South Gate Park Reservoir during the week of September 9, 2007. Provision 11 of the Domestic Water Supply Permit No. 04-15-01P-005 issued by the Department to the City on April 6, 2001 requires the City to monitor the effluent of the 4-MG South Gate Park Reservoir for PCE weekly (Enclosure 1).

Based on the review of the September 2007 Volatile Organic Chemical Compliance Report and attachments submitted by the City, the City collected a total of three PCE samples in September (September 4, 18, and 25, 2007) from the reservoir effluent (Enclosure 2).

Upon inquiry, Mr. Ron Hernandez, Water Production Foreman of the City, responded to the Department in an email dated October 24, 2007 that the City was unable to collect the weekly PCE sample on September 11, 2007, scheduled sample date, due to running out of the VOC vials (Enclosure 3).

The City should have planned ahead and collected the sample as scheduled. Missing sample collection due to lack of VOC vials demonstrates the poor planning on the City's part. In addition, if the City cannot collect samples as scheduled due to mistakes or

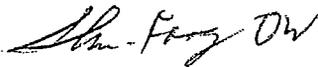
Mr. John E. Chambers  
Page 2  
November 1, 2007

circumstances beyond the City's control, the City should notify the Department and collect replacement samples as soon as possible. This step did not occur.

The City must cease violating Provision 11 of the Domestic Water Supply Permit No. 04-15-01P-005 immediately. Please be advised that if the City fails the monitoring requirement again, the Department will take formal enforcement action.

If you have any questions regarding this letter, please contact Thomas Tsui at (213) 580-5736 or me at (213) 580-5702.

Sincerely,



Shu-Fang Orr, P.E.  
District Engineer  
Angeles District

Enclosures: 1. Excerpts from Permit 04-15-01P-005  
2. September 2007 Volatile Organic Chemical Compliance Report  
3. Email from Ron Hernandez dated October 24, 2007

cc: David Torres  
Field Operations Manager  
City of South Gate  
4244 Santa Ana Ave.  
South Gate, CA 90280.

Mr. John E. Chambers  
Page 3  
November 1, 2007

bcc: System 1910152 – Correspondence (with Enclosure)  
Region (with Enclosure)  
District (with Enclosure)  
Reading (with Enclosure)  
Thomas – PICME (with Enclosure)

1910152 violation of pce monitoring  
SO/TT

Enclosure 1

7. No changes, additions, or modifications shall be made to the sources or treatment in Provision Nos. 4 and 6 unless an amended water permit has first been obtained from the Department.

#### **SOUTH GATE PARK SPRAY AERATION FACILITY**

8. All water served by the South Gate Park treatment facility shall, at all times, meet all maximum contaminant levels and action levels established by this Department.
9. The water from Well Nos. 13, 14, 18, and 19, shall be at all times treated and shall not bypass the reservoir. The aeration system shall be operated continuously.
10. All aeration and disinfection equipment shall be maintained according to the design engineer's and manufacturer's specifications.
11. Samples from the effluent of the 4 MG reservoir shall be analyzed weekly for PCE. In addition, raw water samples from Well Nos. 13, 14, 18, and 19 shall be analyzed monthly for PCE. The City shall arrange with the laboratory to receive the analytical results within two (2) weeks of sampling.
12. The reservoir effluent shall be continuously and reliably chlorinated prior to entering the distribution system such that the residual shall be above 0.2 mg/L. Since chlorine demand fluctuates, it is recommended that the City dose at least to 0.50 mg/L or higher, to be able to maintain the 0.20 mg/L requirement.
13. All analytical results shall be reported on the attached "South Gate Park Treatment Plant Monitoring Report" and submitted by the 10<sup>th</sup> day of the following month to the Department along with daily operational records including, as a minimum, flow rates, total volume treated, daily chlorine residuals, operational changes and unusual occurrences shall be maintained.
14. The City shall not use recycled water, fertilizers, pesticides, or herbicides in the park where Well Nos. 13, 14, 18, and 19 are located without prior approval of this Department.
15. Rain water or the water from the sprinklers in the landscaped areas above the reservoir shall not rise to six (6) inches above ground which is the lowest point of the air filters of aeration system. The sprinklers must always be sized and positioned so that they do not spray water on the filters.

#### **GROUNDWATER SUPPLIES**

16. Well Nos. 2 and 24 – The City shall notify the Department when Well No. 2 and Well No. 24 are ready to be placed back into service. The wells will need to be

Enclosure 2

# CITY OF SOUTH GATE

## Volatile Organic Chemical Compliance Report

REVISED  
BY: [unclear]  
DATE: 10-10-03

Month SEPTEMBER

Year 2007

WELL	CAPACITY (GPM)	NO. OF DAYS OF OPERATION	COMMENTS OR PROBLEMS
13	2160	2	NONE
14	3349	30	NONE
18	1500	30	NONE
19	2536	3	NONE

### Weekly PCE Monitoring - Reservoir Effluent

WEEK	FLOW	EFFLUENT	COMPLIANCE	MODIFICATION TO TREATMENT
1	5500	1.27ug/L	YES	NONE
2	4500	NOT SAMPLED (1-34)		
3	4500	1.39ug/L	YES	NONE
4	4500	0.87ug/L	YES	NONE
5				

### Monthly PCE Monitoring - Source Sampling

WELL	DATE OF COLLECTION	RESULTS
13	9-5-07	5.08ug/L
14	9-5-07	2.51ug/L
18	9-5-07	7.71ug/L
19	9-5-07	2.47ug/L



Our Experience Is Your Protection

RECEIVED  
CITY OF SOUTH GATE  
DEPT. OF PUBLIC WORKS

# Michelson Laboratories, Inc.

6280 Chalet Drive, Commerce, California 90040-3761, Telephone (562) 928-0553 / FAX (562) 927-6625

## LABORATORY CERTIFICATE

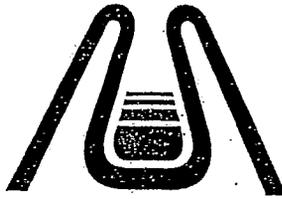
Submitted By: CITY OF SOUTH GATE  
DEPARTMENT OF PUBLIC WORKS  
4244 SANTA ANA ST.  
SOUTH GATE, CA 90280  
Attn :MR. HERNANDEZ

Date: 10/09/2007  
Lab No. : 090407-C37007  
Report No. : 090407-C37007A  
Order No. :  
Received : ~~09/27/2007~~  
Page : 1 of 1

REPORT #	PRODUCT / TEST	METHOD	RESULT	DET LIMIT	UNITS	START:DT
C37007-01	Product .PARK RESERVOIR TREATED WATER 9/4/07 0045 PCE (Tetrachloroethene)	EPA 524.2	1.27	0.08	ug/L	09/20/07

## MICHELSON LABORATORIES, INC.

Stephen Roesch, M.S., Laboratory Director | 10/9/2007 8:58:45 AM



Our Experience Is Your Protection

# Michelson Laboratories, Inc.

6280 Chalet Drive, Commerce, California 90040-3761 Telephone: (562) 928-0553 / FAX (562) 927-6625

RECEIVED  
DEPT. OF HEALTH SERVICES  
OWF0B-LOS ANGELES

## LABORATORY CERTIFICATE

Submitted By: CITY OF SOUTH GATE  
DEPARTMENT OF PUBLIC WORKS  
4244 SANTA ANA ST.  
SOUTH GATE, CA 90280  
Attn :MR. HERNANDEZ

Date: 09/21/2007  
Lab No. : 091807-C37486  
Report No. : 091807-C37486A  
Order No. :  
Received : 09/18/2007  
Page : 1 of 1

REPORT #	PRODUCT / TEST	METHOD	RESULT	DET LIMIT	UNITS	START:DT
C37486-01	Product :WATER - PARK RESERVOIR TREATED WATER PCE (Tetrachloroethene)	EPA 524.2	1.39	0.08	ug/L	09/20/07

### MICHELSON LABORATORIES, INC.

Stephen Roesch, M.S., Laboratory Director | 9/21/2007 2:32:38 PM JC



Our Experience Is Your Protection

STATE OF CALIFORNIA  
DEPARTMENT OF PUBLIC HEALTH

# Michelson Laboratories, Inc.

6280 Chalet Drive, Commerce, California 90040-3761, Telephone (562) 928-0553 / FAX (562) 927-6625

## LABORATORY CERTIFICATE

Submitted By: CITY OF SOUTH GATE  
DEPARTMENT OF PUBLIC WORKS  
4244 SANTA ANA ST.  
SOUTH GATE, CA 90280  
Attn :MR. HERNANDEZ

Date: 10/10/2007  
Lab No. : 092507-C37772  
Report No. : 092507-C37772A  
Order No. :  
Received : ~~9/25/2007~~  
Page : 1 of 1

REPORT #	PRODUCT / TEST	METHOD	RESULT	DET LIMIT	UNITS	START:DT
C37772-01	Product:PARK RESERVOIR TREATED WATER - 9/25/07 9.15 PCE (Tetrachloroethene)	EPA 524.2	0.87	0.08	ug/L	10/04/07

## MICHELSON LABORATORIES, INC.

Stephen Roesch, M.S., Laboratory Director | 10/10/2007 8:49:22 AM

Enclosure 3

**Tsui, Thomas (CDPH-DDWEM)**

---

**From:** Lopez, Cecilia (CDPH-DDWEM)  
**Sent:** Wednesday, October 24, 2007 11:12 AM  
**To:** Tsui, Thomas (CDPH-DDWEM)  
**Cc:** 'Ron Hernandez'  
**Subject:** Reason - Missing PCE and Well Conform Analysis

FYI

---

**From:** Ron Hernandez [mailto:rhernandez@sogate.org]  
**Sent:** Wednesday, October 24, 2007 10:45 AM  
**To:** Lopez, Cecilia (CDPH-DDWEM)  
**Subject:** Missing PCE and Well Conform Analysis

The reason for the Park Reservoir Treated effluent not being sampled on 9-11, was that we ran out of VOC vials. Well 26 was not sampled for total coliforms due to dead batteries and a blown battery charger fuse on the Waukesha engine that drives the well. As far as well 28 not being sampled on 9-11-07, my operator forgot to sample this well. I directed that these wells be sampled immediately on 10-2-07, in addition the Park Reservoir Treated Effluent was routinely sampled on 10-3-07. I will fax these results over by 11:00 this morning.

10/24/2007

ENCLOSURE 3

Second Warning Letter to the City  
March 13, 2008



MARK B HORTON, MD, MSPH  
*Director*

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



ARNOLD SCHWARZENEGGER  
*Governor*

March 13, 2008

Mr. John E. Chambers  
Water Division Manager  
City of South Gate  
4244 Santa Ana Ave.  
South Gate, CA 90280.

**SYSTEM NO. 1910152 – VIOLATION OF THE SOUTH GATE PARK SPRAY  
AERATION FACILITY TETRACHLOROETHYLENE (PCE) MONITORING  
REQUIREMENT IN FEBRUARY 2008**

Dear Mr. Chambers:

On March 11, 2008, Mr. Ron Hernandez, Water Production Foreman of the City, called Mr. Thomas Tsui, Sanitary Engineer with this Department and informed Mr. Tsui that the City of South Gate (City) had forgotten to collect the monthly raw water samples for the South Gate Park Spray Aeration Facility during the first week of February. Based on the review of the February 2008 Volatile Organic Chemical Compliance Report and attachments submitted by the City, the City did not collect PCE samples in February 2008 from Wells 13, 14 and 18. Provision .11 of the Domestic Water Supply Permit No. 04-15-01P-005 issued by the Department to the City on April 6, 2001 requires the City to monitor the raw water from Wells 13, 14, 18 and 19 for PCE monthly (Enclosure 1). Well 19 was offline in February 2008 (Enclosure 2).

This is the second time in recent months that the City did not collect all the required PCE samples for the above treatment facility. In November 2007, the Department sent a warning letter to the City for missing a PCE sample from the effluent of South Gate Park Reservoir during the week of September 9, 2007.

If the City had reviewed the monitoring results on a regular basis, the City would have realized the mistake and been able to collect the make-up samples before the end of the month.

Mr. John E. Chambers  
Page 2  
March 13, 2008

The City must cease violating Provision 11 of the Domestic Water Supply Permit No. 04-15-01P-005 immediately. **Please be advised that a citation will be issued to the City if the City fails the monitoring requirement again.**

If you have any questions regarding this letter, please contact Mr. Tsui at (213) 580-5736 or me at (213) 580-5702.

Sincerely,



Shu-Fang Orr, P.E.  
District Engineer  
Angeles District

Enclosures: 1. Excerpts from Permit 04-15-01P-005  
2. February 2008 Volatile Organic Chemical Compliance Report

cc: David Torres  
Field Operations Manager  
City of South Gate  
4244 Santa Ana Ave.  
South Gate, CA 90280.

Mr. John E. Chambers  
Page 3  
March 13, 2008

bcc: System 1910152 – Correspondence (with Enclosure)  
Region (with Enclosure)  
District (with Enclosure)  
Reading (with Enclosure)  
Thomas – PICME (with Enclosure)

1910152 violation of pce monitoring 2  
SO/TT

**ENCLOSURE 1**

7. No changes, additions, or modifications shall be made to the sources or treatment in Provision Nos. 4 and 6 unless an amended water permit has first been obtained from the Department.

#### **SOUTH GATE PARK SPRAY AERATION FACILITY**

8. All water served by the South Gate Park treatment facility shall, at all times, meet all maximum contaminant levels and action levels established by this Department.
9. The water from Well Nos. 13, 14, 18, and 19, shall be at all times treated and shall not bypass the reservoir. The aeration system shall be operated continuously.
10. All aeration and disinfection equipment shall be maintained according to the design engineer's and manufacturer's specifications.
11. Samples from the effluent of the 4 MG reservoir shall be analyzed weekly for PCE. In addition, raw water samples from Well Nos. 13, 14, 18, and 19 shall be analyzed monthly for PCE. The City shall arrange with the laboratory to receive the analytical results within two (2) weeks of sampling.
12. The reservoir effluent shall be continuously and reliably chlorinated prior to entering the distribution system such that the residual shall be above 0.2 mg/L. Since chlorine demand fluctuates, it is recommended that the City dose at least to 0.50 mg/L or higher, to be able to maintain the 0.20 mg/L requirement.
13. All analytical results shall be reported on the attached "South Gate Park Treatment Plant Monitoring Report" and submitted by the 10<sup>th</sup> day of the following month to the Department along with daily operational records including, as a minimum, flow rates, total volume treated, daily chlorine residuals, operational changes and unusual occurrences shall be maintained.
14. The City shall not use recycled water, fertilizers, pesticides, or herbicides in the park where Well Nos. 13, 14, 18, and 19 are located without prior approval of this Department.
15. Rain water or the water from the sprinklers in the landscaped areas above the reservoir shall not rise to six (6) inches above ground which is the lowest point of the air filters of aeration system. The sprinklers must always be sized and positioned so that they do not spray water on the filters.

#### **GROUNDWATER SUPPLIES**

16. Well Nos. 2 and 24 – The City shall notify the Department when Well No. 2 and Well No. 24 are ready to be placed back into service. The wells will need to be

**ENCLOSURE 2**

# CITY OF SOUTH GATE



## Volatile Organic Chemical Compliance Report

Month FEBRUARY

Year 2008

WELL	CAPACITY (GPM)	NO. OF DAYS OF OPERATION	COMMENTS OR PROBLEMS
13	2160	1	NONE
14	3349	29	NONE
18	1500	29	NONE
19	2536	1	WELL OUT OF SERVICE. PUMP AND MOTOR PULLED

### Weekly PCE Monitoring - Reservoir Effluent

WEEK	FLOW	EFFLUENT	COMPLIANCE	MODIFICATION TO TREATMENT
1	4200	2.78ug/L	YES	NONE
2	4200	1.3ug/L	YES	NONE
3	4200	1.2ug/L	YES	NONE
4	4200	0.85ug/L	YES	NONE
5				

### Monthly PCE Monitoring - Source Sampling

WELL	DATE OF COLLECTION	RESULTS
13		N/S
14		N/S
18		N/S
19		WELL OUT OF SERVICE

The City's letter to the Department dated June 26, 2013  
(without Enclosures)

*c/o Shufornal  
Cliff*



# City of South Gate

PUBLIC WORKS FIELD OPERATIONS  
4244 SANTA ANA STREET • SOUTH GATE, CA 90280 • (323) 563-5785  
FAX (323) 582-3106

DAVID TORRES  
FIELD OPERATIONS MANAGER

June 26, 2013

## Received

JUN 27 2013

CDPH-DWFOB-Los Angeles

Mr. Cliff Tien-Tsu Cheng, P.E.  
Associate Sanitary Engineer  
State of California  
Department of Public Health  
Drinking Water Field Operations Branch  
500 North Central Avenue, Suite 500  
Glendale, CA 91203

Subject: **COMPLIANCE TO CITATION 04-22-12C-052**

Dear Mr. Cheng,

On October 11, 2012 the California Public Health Department issued a citation to the City of South Gate due to the failure to collect triggered source water samples within 24 hours of being notified of the total coliform positive for the sample collected on August 18, 2012 at 5155 Duncan Way. In order to comply with the citation, the City was directed to provide training related to water quality monitoring, reporting and notification regulations; and complete the notification to persons served by the City of this Ground Water Rule (GWR) monitoring violation. Additionally, we were directed to enhance our internal control mechanisms for our sampling plan.

Our existing sampling procedures with newly implemented enhancements are as follows:

### EXISTING

- Ron Hernandez creates an annual sampling schedule ~~according to the approved GWR-representative monitoring plan.~~
- The sampling schedule is divided into four quarters to include weekly, monthly, quarterly and annual sampling. The samples are assigned by quarter between two Pump Operators.
- Pump Operators are responsible to complete a bacteriological field worksheet and chain of custody form. The chain of custody is relinquished to Michelson's Laboratory; a carbon copy is filed by the sampler who then also provides Ron Hernandez a copy.
- Ron Hernandez implements and oversees that the sampling schedule is adhered to. Weekly emails are generated by the sampler to confirm the samples taken that week and Ron Hernandez verifies sample completion via email.

*Hand Delivered*

## ENHANCEMENTS

- Effective immediately, one Pump Operator will be responsible for sample collections. An alternate will be assigned as needed.
- A weekly sample check sheet was created and implemented (see attached).
- A signature block on the weekly sample check sheet was created to ensure oversight and accountability. In the event that Ron Hernandez is unavailable, a designee will be appointed to review and sign the submitted weekly sampling check sheet.
- The submitted weekly, monthly, quarterly check list of our sample site plan will be reviewed and signed by the Water Division Manager for signature until a level of consistency is upheld. A designee will be appointed should the Water Division Manager be unavailable.

## TRAINING

I have developed the training presentation related to water quality monitoring reporting notification regulations. I have attached the presentation for your records. Training with staff that holds a T2 or higher certification is scheduled for Wednesday, June 26, 2013. In addition to my training slides, the April 10, 2013 Revised Total Coliform Rule webinar presentation from the USEPA Office of Ground Water and Drinking Water will be presented to staff members. Presentation is available on the EPA website: <http://water.epa.gov/lawsregs/rulesregs/sdwa/tcr/upload/rtrcrwebinar41013-1-2.pdf>

Additionally, the following staff members attended the 2013 Groundwater Quality Workshop presented by WRD on May 29, 2013:

- Ron Hernandez
- Christopher Castillo
- Daniel Dhayer
- Phillip Lugo
- Oscar Cortes
- Rogelio Montanez

## PUBLIC NOTIFICATION

The notice of the Ground Water Rule violation (Citation #04-22-12C-052) was included in the 2012 Consumer Confidence Report (CCR). The CCR was mailed out on June 20, 2013 to all persons served by the City of South Gate Water System. The proof of notification is attached. Additionally, the CCR will be posted on the City's website.

I believe that this completes all the required corrective actions for Citation 04-22-12C-052, issued on October 11, 2012. Should you have any questions, please feel free to contact me at 323-595-9627 or via email at [ccastillo@sogate.org](mailto:ccastillo@sogate.org).

Sincerely,



Christopher Castillo  
Interim Water Division Manager

Enclosures

cc: file