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**STATE OF CALIFORNIA  
DEPARTMENT OF PUBLIC HEALTH**

**IN RE:** Lloyd-Butler Mutual Water Company  
2317 Los Angeles Avenue  
Oxnard, CA 93066

**TO:** Mr. Jim Lloyd Butler  
President

**CITATION**

**SYSTEM NO:** 5603302  
**CITATION NO:** 04-06-13C-011

**VIOLATION**

The Drinking Water Field Operations Branch of the Department of Public Health, (CDPH), hereby issues a Citation to Lloyd-Butler Mutual Water Company for the following violations:

1. Groundwater Rule – Triggered Source Water Monitoring  
Section 141.402, Title 22, CCR. Specifically, Lloyd-Butler Mutual Water Company was not in compliance with the Groundwater Rule during the month of August 2013. The water system failed to collect a triggered source water sample from the representative groundwater source(s) per their Groundwater Rule Plan (attached). On August 27, 2013, a routine sample location at 2077 West Los Angeles Avenue was total coliform positive, *E. Coli* negative. Four repeats were taken from the distribution which were all total coliform negative. A sample from the representative groundwater source(s) was not collected.



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2       2.       Total Coliform Rule Maximum Contaminant Level (MCL) Exceedance

3       Section 64424, Title 22, CCR. Specifically, Lloyd-Butler Mutual Water Company failed the  
4       TCR Rule by exceeding the MCL. One routine distribution sample and one repeat sample  
5       (see below) were each total coliform positive. A public water system collecting less than 40  
6       samples per month cannot have more than one positive coliform sample in a calendar  
7       month. Another seven repeat samples were collected in September 2013 and all were  
8       total coliform negative. According to Section 116650 of the Health and Safety Code, the  
9       above is classified as a non-continuing violation.

10                               **Table 1. Coliform results for the Month of September 2013**

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<i>Date</i>	<i>Site</i>	<i>Type of Sample</i>	<i>Total Coliform</i>	<i>Fecal Coliform</i>	<i>Chlorine Residual (mg/L)</i>
9/20/13	<b>House #2 Front</b>	Routine	<b>Present</b>	Absent	0.02
9/22/13	<b>Clubhouse Drive</b>	Repeat	<b>2 MPN/100mL</b>	<1.1 MPN/100mL	0.1

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14       Please note the low concentration of chlorine in the coliform positive distribution  
15       samples. Chlorine concentrations at this level provide negligible protection from  
16       microbial contamination and should be maintained above 0.5 mg/L throughout the  
17       distribution system.

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19       **BACKGROUND**

20       Lloyd-Butler Mutual Water Company's water supply is obtained from three wells  
21       (JLB 3, JLB 4 and JLB 5). Lloyd-Butler Mutual Water Company uses Well JLB-5 as  
22       the primary active well that produces approximately 708 GPM. Wells JLB-3 and  
23       JLB-4 produce 532 GPM and 787 GPM respectively and are maintained as standby  
24       sources for emergencies and back-up use for the domestic water system. JLB-3  
25       was sampled twice in September and both samples were total coliform positive (1  
26       and 15 MPN/100mL). As a follow up to the positive samples in September, the  
27       untreated water from JLB-3 shall be sampled in October for coliforms.



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Lloyd-Butler Mutual Water Company maintains a separate distribution system for irrigation that is served by the same wells. A separate storage tank is utilized for the irrigation system. The irrigation services are served through backflow prevention devices.

The Groundwater Rule requires water systems serving groundwater to collect triggered source water samples within 24 hours of being notified of a distribution total coliform positive sample. In August 2013, Lloyd-Butler Mutual Water Company did not collect a sample from a representative source(s) after being notified of the positive distribution sample collected on August 27, 2013.

The Total Coliform Rule requires water systems that collect less than 40 samples per month to have less than 1 coliform positive sample every month. During September 2013, two samples were total coliform positive, *E. Coli* negative.

**DIRECTIVES**

Lloyd-Butler Mutual Water Company is hereby directed to take the following actions:

1. When a Total Coliform Rule sample from the distribution system is total coliform positive, Lloyd-Butler Mutual Water Company must collect at least three repeats from the distribution system as well as a sample from each of the groundwater wells according to their approved Groundwater Rule Monitoring Plan. The samples must be collected within 24 hours of being notified of the original positive result.

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2. Write a letter to the CDPH responding to this Citation explaining the suspected cause of the total coliform positives and what is being done to remedy the situation.
  
3. Provide the number of days during the last two months each of the three permitted groundwater wells (JBL 3, JBL 4 and JBL 5) ran. Standby wells cannot be utilized for more than 5 consecutive days or 15 total days in the year. Any amount of run time during the day constitutes one days use.
  
4. Please ensure the most recent water quality data from all wells has been electronically submitted to CDPH's water quality database. Currently, the majority of water quality constituents for JBL 3 and JBL 4 are not in the database and show as PAST DUE.
  
5. Within 30 days of receipt of this violation, notify the public served by Lloyd-Butler Mutual Water Company of the TCR MCL failure. The procedure and format must be approved by CDPH. A suggested format is attached and is available electronically upon request or at the following web address:  
<http://www.cdph.ca.gov/certlic/drinkingwater/Documents/Notices/Tier%20%20Resolved%20TCR%20Notice.doc>.  
Any changes must be reviewed and approved by CDPH. The public must be notified by hand-delivery and by using one of the following methods to reach persons not likely to be reached by a mailing or direct delivery (renters, visitors, etc.):
  - a. Posting in conspicuous public places served by the water system, or on the Internet.
  - b. Publication in a local newspaper; or

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c. Delivery to community organizations.

6. Within one year of receipt of this Citation, notify the public of the GWR violation which occurred during the month of August 2013. The notification may be included in the 2013 Consumer Confidence Report.

7. Continue submitting the required monthly distribution system coliform sample(s) by the 10th of each month. A copy of the response and proof of public notification shall be submitted to:

Kurt Souza, P.E.  
Chief, Southern California Section  
Department of Public Health  
Drinking Water Field Operations Branch  
1180 Eugenia Place, Suite 200  
Carpinteria, CA 93013-2000

CIVIL PENALTIES

Failure to comply with any provision of this Citation will 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.

Oct 18, 2013  
Date

  
Kurt Souza, P.E.  
Chief, Southern California Section  
Santa Barbara District (DWFOB)

cc: Bruce Reed, WREA  
Lori Frost, Operator  
Ventura County Environmental Health

