

STATE OF CALIFORNIA
DEPARTMENT OF PUBLIC HEALTH

IN RE: **SHERWOOD FOREST GOLF CLUB**
Water System No. 1000599

TO: Mr. Randy Hansen
Sherwood Forest Golf Club
79 N. Frankwood
Sanger, CA 93657

CC: Fresno County Division of Environmental Health

CITATION FOR NONCOMPLIANCE
TOTAL COLIFORM MAXIMUM CONTAMINANT LEVEL VIOLATION

January and April 2013

Issued on April 10, 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 Sherwood Forest Golf Club (hereinafter 'Water System'), for failure to comply with Section 116555(a)(1) of the CHSC and Section 64426.1(b)(2) of Title 22, California Code of Regulations (CCR). Specifically, the Water System (mailing address: 79 N. Frankwood, Sanger, CA 93657) failed to comply

1 with the total coliform Maximum Contaminant Level (MCL) for the months of January and
2 April 2013.

3
4 The Water System operates under a domestic water supply permit issued by the Department
5 in March of 2012. The Water System is located at 79 S. Frankwood Road, north of State
6 Route 180, in Fresno County. The Water System supplies water to the Sherwood Forest
7 Golf Course and the associated facilities. Records on file with the Department indicate a
8 transient population of approximately 200 individuals, along with approximately 20 staff.
9 The Water System maintains a snack bar that operates under a food service permit issued by
10 Fresno County Division of Environmental Health. The Water System is served by an onsite
11 sewer system. The Water System is approximately 8 1/2 miles north of the City of Reedley;
12 a number of other small public water systems are within two miles of the Water System.

13
14 Section 64426.1(b)(2) specifies that a public water system collecting fewer than 40 samples
15 per month is in violation of the total coliform MCL when more than one sample collected
16 during any month is total coliform-positive.

17
18 The Water System is required to collect a minimum of one (1) distribution system
19 bacteriological sample per quarter. The bacteriological water analysis results submitted by
20 the Water System reported the presence of total coliform bacteria in three (3) of five (5)
21 samples, including one from the well, collected by the Water System in January 2013 **and**
22 in five (5) of five (5) samples, including one from the well, collected by the Water System
23 in April 2013. None of the positive samples showed the presence of fecal coliform or *E. coli*
24 bacteria.

1 The following table summarizes the bacteriological monitoring conducted during the
2 months of January, February, March and April (to date) 2013:

| 3 4 5 | Collection Date | Number of Samples | Sample Type | Number TC positive | Number E. Coli positive |
|-------------|--------------------|-------------------|-------------|--------------------|----------------------------|
| 6 | 1/4/2013 | 1 | Routine | 1 | 0 |
| 7 | 1/8/2013 | 4 | Repeat | 2 including source | 0 |
| 8 | 2/4/2013 | 1 | Routine | 0 | 0 |
| 9 | 3/4/2013 | 1 | Routine | 0 | 0 |
| 10 | 4/1/2013 | 1 | Routine | 0 | 0 |
| 11 | 4/2/2013 | 4 | Repeat | 4 including source | 0 |

12
13 Due to the above-mentioned total coliform positive samples, the Water System failed the
14 total coliform MCL for the months of January and April 2013. All water sample results for
15 coliform bacteria collected during 2011, 2012 and 2013 (to date) are summarized in
16 Attachments A and B.

17
18 In the permit documents issued in March 2012, Department staff notified Water System
19 staff of the concern that the well may be groundwater under the direct influence of surface
20 water (GWUDI) based on the proximity of the well to the Kings River as well as the lack of
21 well construction documentation. As part of the permit conditions, the Water System was
22 required to collect a raw water sample for coliform analysis from Well 01 monthly for six
23 consecutive months. All water samples for coliform bacteria collected from the source are
24 summarized in Attachment B. Additionally, as referenced in the permit report, the
25 unapproved filtration unit installed on the well discharge may be harboring bacteria.

1 **The five routine samples required the month following a month with one or more total**
2 **coliform-positive samples were not collected during February 2013.** Only one routine
3 sample was collected on February 4, 2013 and was negative for total coliform bacteria.

4
5 The Groundwater Rule adopted by the Department, effective August 18, 2011, requires the
6 collection of a sample for bacteriological evaluation from wells serving the system in
7 response to a coliform positive distribution sample. This requirement was met with the
8 round of repeat sampling conducted by the Water System on January 8, 2013.

9
10 **ASSOCIATED VIOLATIONS**

11 Additionally, the Water System has failed to comply with the following Section 64424 of
12 Title 22, CCR:

13
14 Section 64424(d) specifies that if a public water system for which fewer than five routine
15 samples per month are collected has one or more total coliform-positive samples, the water
16 supplier shall collect at least five routine samples the following month. Only one routine
17 sample was collected during February 2013.

18
19 **NOTIFICATION REQUIREMENTS**

20 Section 64426.1(c) requires a public water system to notify the Department and the
21 consumers of the water system, when a violation of Section 64426.1(b)(1) through (4)
22 occurs. Notification to the Department shall be by the end of the business day on which the
23 violation has been determined. If the Department is closed, notification shall be within 24
24 hours of the determination. The Department was notified on January 7, 2013, in accordance
25 with the above-referenced section.

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

4
5 The Water System shall post the public notice in conspicuous locations within the water
6 system. Section 116450(g) requires that upon receipt of notification from a public water
7 system, schools must notify school employees, students, and parents (if the students are
8 minors), residential rental property owners or managers (including nursing homes and care
9 facilities) must notify their tenants and business property owners, managers or operators
10 must notify employees of businesses located on the property.

11
12 Proof of notification is required. The Water System shall complete Attachment D and return
13 it to the Department by **May 10, 2013**.

14
15 **DIRECTIVES**

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

- 17 1. By **April 25, 2013**, the Sherwood Forest Golf Club water system shall provide
18 public notification of the total coliform Maximum Contaminant Level failure for
19 January and April 2013 by posting the notice in conspicuous locations throughout
20 the area served by the water system.

21
22 By **May 10, 2013**, the Water System shall provide proof of public notification of the
23 total coliform MCL violation by completing Attachment D and returning it to:

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

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27

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. By May 10, 2013, the Water System shall complete and submit the enclosed “Positive Total Coliform Investigation” form to the Department that describes the incident and all corrective actions taken, and the results of the investigation for both January and April violations. The appropriate investigation report is provided as Attachment E.

4. By April 30, 2013, continuous chlorination equipment shall be installed on the discharge of the well and operated for at least one month. A chlorine residual of at least 1.0 mg/l shall be maintained in all areas of the distribution system at all times. Information regarding the permanent chlorination equipment and installation procedures shall be submitted to the Department for review and approval prior to installation. The installation shall be conducted by a person qualified and experienced with chlorination equipment.

5. The Water System shall have on staff or under contract a minimum of a D1 Certified Distribution Operator to operate the chlorination equipment. Documentation of the certification of the operator shall be provided to the Department by April 30, 2013. The operator shall visit the well site and review the chlorination treatment on at least a weekly basis and document the date and time of the visit, the settings on the chemical feed equipment, the chlorine stock on hand and the chlorine residual at the well site and in the farthest part of the distribution

1 system. Documentation of the site visits shall be submitted to the Department by
2 the 10th day of the following month.

3
4 6. The chlorine residual must be measured and reported at the same time and
5 location(s) that the bacteriological sample(s) are collected. The residual(s) should
6 be provided to the Department along with the bacteriological laboratory analysis.

7
8 7. The Water System shall initiate immediately monthly sampling of the raw well
9 water for coliform bacteria. The sample must be collected at a location ahead of
10 chlorination and shall be analyzed for total and fecal coliform or E.coli bacteria
11 using a density analytical method with the analytical results reported in MPN/100
12 ml. The results of all samples shall be submitted to the Department by the 10th day
13 of the following month. After six consecutive monthly samples do not show the
14 presence of coliform bacteria, the water system may submit a written request to the
15 Department for a reduction in sampling to one sample per quarter.

16
17 8. In the event that chlorination is still being provided after **May 31, 2013**, an
18 application (Form EH 100, Attachment F) for a permit amendment for the addition
19 of continuous chlorination treatment must be submitted to the Department. A
20 permit fee of \$258 shall be included at the time the application is submitted to the
21 Department. While the Water System is being chlorinated monthly raw water
22 bacteriological samples should be collected from the wellhead and analyzed, and
23 chlorine residuals should be monitored throughout the distribution system

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.

4/10/13

Date

Betsy Lichte

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



BSL/EL

Attachments:

- Attachment A: Bacteriological Distribution Monitoring Report
- Attachment B: Source Bacteriological Monitoring Report
- Attachment C: Public Notice
- Attachment D: Proof of Notification Form
- Attachment E: Investigation Report for Bacteriological MCL Failure form
- Attachment F: Amended Water Supply Permit Application (Form EH 100)

Bacteriological Distribution Monitoring Report

1000599 Sherwood Forest Golf Club
Distribution System Freq: 1/Q

| Sample Date | Time | Location | T Coli | E Coli | F Coli | Type | CI2 | Violation | Comment |
|-------------|-------|--------------------------------|--------|--------|--------|---------------|-----|-----------|---------|
| 9/30/2011 | | System is not fully active yet | | | | | | | |
| 12/6/2011 | 12:06 | South End of Club House | <1.1 | A | | Routine | | | |
| 1/3/2012 | 13:20 | South End of Club House Hose | <1.1 | A | | Routine | | | |
| 2/6/2012 | 14:10 | SOURCE SAMPLE | | | | | | | |
| 4/2/2012 | 13:55 | South End of Club House Hose | <1.1 | A | | Routine | | | |
| 7/10/2012 | 13:21 | S End of Club House HB | <1.1 | <1.1 | | Routine | | | |
| 10/2/2012 | 15:56 | S End of Club House HB | <1.1 | <1.1 | | Routine | | | |
| 1/4/2013 | 14:09 | South End of Club House HB | 1.1 | <1.1 | | Routine | | | |
| 1/8/2013 | 11:40 | 1 REP 2- Maintenance Shop | 5.1 | <1.1 | | Repeat | | MCL | |
| 1/8/2013 | 11:58 | Main Well | 5.1 | <1.1 | | Source Repeat | | | |
| 1/8/2013 | 12:04 | 1 ROU Sound End of Club House | <1.1 | <1.1 | | Repeat | | | |
| 1/8/2013 | 12:12 | 3 ROU- N. End of Club House | <1.1 | <1.1 | | Repeat | | | |
| 2/4/2013 | 13:48 | South End of Club House HB | <1.1 | <1.1 | | Routine | | MR4 | |
| 3/4/2013 | 13:45 | So. End of Club House HB | <1.1 | <1.1 | | Routine | | | |
| 4/1/2013 | 15:13 | So. End of Club House HB | >23 | <1.1 | | Routine | | | |
| 4/2/2013 | 15:20 | Main Well | >23 | <1.1 | | Source Repeat | | | |
| 4/2/2013 | 15:30 | No. End of Club House | >23 | <1.1 | | Repeat | | | |
| 4/2/2013 | 15:40 | So. End of Club House | >23 | <1.1 | | Repeat | | MCL | |
| 4/2/2013 | 15:50 | Maintenance Shop | >23 | <1.1 | | Repeat | | | |

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 |

Source Bacteriological Monitoring Report

1000599 Sherwood Forest Golf Club

| <i>Sample Date</i> | <i>Time</i> | <i>Source</i> | <i>Sample Type</i> | <i>Test Method</i> | <i>T Coli</i> | <i>E Coli</i> | <i>F Coli</i> | <i>HPC</i> | <i>Violation</i> | <i>Comments</i> |
|--------------------|-------------|---------------|--------------------|--------------------|---------------|---------------|---------------|--------------------|------------------|-----------------|
| 2/6/2012 | 14:10 | Main Well #1 | Well | MPN | <1.1 | | | | | |
| 4/2/2012 | 14:07 | Effluent | Treatment | MPN | ≥1600 | | ≥1600 | 3880 CFU/ mL | | pH=8.0 |
| 10/2/2012 | 15:56 | | Well | | A | | | | | |
| 1/8/2013 | 11:58 | Main Well | Well | MPN | 5.1 | <1.1 | | | | |
| 4/2/2013 | 15:20 | Main Well | Well | MPN | >23 | <1.1 | | | | |