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STATE OF CALIFORNIA
DEPARTMENT OF PUBLIC HEALTH

In Re: Calipatria State Prison Water System
To: Mr. Frank Chavez
Warden
P.O. Box 5001
Calipatria, CA 92233

CITATION FOR NONCOMPLIANCE
Citation No. 05-14-13C-006
Issued on June 26, 2013

Section 116650, Chapter 4, Part 12, Division 104 of the California Health and Safety Code (H&S Code), authorizes the California Department of Public Health, Division of Drinking Water and Environmental Management (CDPH) to issue a citation for failure to comply with the requirements of Chapter 4, the California Safe Drinking Water Act, or any regulation, permit, standard, or order issued or adopted thereunder.

VIOLATION

CDPH has determined that Calipatria State Prison (Calipatria) has violated provisions contained in the H&S Code, Title 22, California Code of Regulations (CCR). These violations include, but are not limited to, the following:

- 1 1. CCR, Section 64413.7(c): Failure to ensure that a chief operator or shift operator be
2 on-site or contacted within one hour of the incident described in the Chronology of
3 Events section of this citation.
- 4 2. CCR, Section 64413.5(d): Specifically, from 9:45 PM June 10th, 2013 to 5:00 AM June
5 11th, 2013 Calipatria failed to provide an equal degree of operational oversight and
6 reliability during unmanned Water Treatment Plant (WTP) operation.
- 7 3. Provision 1 of Permit Number 04-92-007: Specifically, Calipatria failed to reliably
8 disinfect all water passing through the granular activated carbon (GAC) filters prior to
9 delivery to the distribution system.
- 10 4. CCR, Section 64661: Specifically, Calipatria failed to log the low chlorine incident, at
11 the time of the incident, and call staff per the July 20th, 2011 Water Plant Callout
12 Procedures Operations Plan.

13 14 **ENFORCEMENT HISTORY**

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16 On July 6th, 2011, a Notice of Violation was issued by CDPH within the 2011 Sanitary
17 Survey report for failure to provide an equal degree of operational oversight and reliability
18 during unmanned water treatment plant (WTP) operation.

19
20 On October 3, 2012, a Notice of Violation was issued by CDPH for failure to provide an
21 equal degree of operational oversight and reliability during unmanned WTP operation,
22 failure to ensure that a chief operator or shift operator be on-site or contacted within one

1 hour of the incident, and failure to reliably disinfect all water passing through the GAC
2 filters prior to delivery to the distribution system.

3
4 **BACKGROUND**

5
6 Calipatria is a large community water system that supplies water for domestic purposes.
7 Calipatria State Prison was designed to house 2,000 maximum-security and 200 minimum-
8 security inmates, and a staff of approximately 850. The WTP is designed to serve up to
9 double this number of inmates in case of overcrowding and at one time served as many as
10 4,800. As of 2012, the average number served by the WTP was 4,200.

11
12 CDPH issued Domestic Water Supply Permit Number 04-92-07 on August 26, 1992 to
13 operate a WTP consisting of a 2.0 million gallon (MG) finished water storage reservoir, four
14 GAC filters, and chlorination facilities. The Calipatria water system supplies a single zone
15 distribution system. Calipatria distributes Colorado River water that has been treated at
16 Golden State Water Company -Calipatria's WTP. The treated water is delivered from
17 Golden State Water Company through a permanent connection.

18
19 **CHRONOLOGY OF EVENTS & CORRECTIVE ACTIONS TAKEN**

20
21 **CHRONOLOGY OF EVENTS**

22 The following is the chronology of events that occurred during June 2013 regarding the
23 violation.

24 June 10th, 2013, 3 PM: The Water Treatment Operators end their shift and leave the plant
25 operating in automatic mode. The WTP begins unmanned operations.



1
2 June 10th, 2013 9:45 PM: The WTP effluent low chlorine alarm activates, indicating that the
3 chlorine residual entering the distribution system is below 0.2 parts per million (ppm). The
4 Watch Commander initiates a "call out" to a Water Treatment Operator to report back to
5 the WTP. However, no operators answered the call. The Watch Commander left a
6 voicemail on a single operator mobile phone. However, it was reported by the operator that
7 the phone had a dead battery and the voicemail was not received until the next day. The
8 Watch Commander did not call the Administrator on Duty or the Corrections Plant
9 Manager, per the July 20th, 2011 Water Plant Callout Procedures Operations Plan.
10 However, according to the Water Plant Alarm Response Log, the Watch Commander sent
11 the Administrator on Duty an e-mail notification
12

13 June 11th, 2013, 5:00 AM: Calipatria's Chief Operator arrives at the prison at the start of
14 the manned shift and notes the low chlorine alarm. The operator places the WTP in GAC
15 bypass, which immediately raises the WTP's effluent chlorine residual to 1.8 ppm.
16 Calipatria's effluent records indicate that during the 7-hour period prior to the WTP being
17 placed in bypass, the WTP produced approximately 42,000 gallons of water. Based on the
18 WTP effluent chlorine residual historian, during this period the chlorine residual levels
19 entering the distribution system during this period were between 0.12 and 0.18 ppm. WTP
20 staff sampled chlorine residual levels throughout the distribution system and determined
21 the chlorine residual levels to be between 0.40 and 0.88 ppm. WTP staff took five special
22 distribution system bacteriological samples.
23



1 June 11th, 2013, 5:00 AM to 6:00 AM: WTP staff clear the clogged chlorine injection line
2 and place the WTP back into service. Chlorine injection was set between 1.65 to 1.75
3 ppm.

4
5 June 11th, 2013, 9:00 AM: WTP staff alert CDPH of the low chlorine incident. CDPH
6 requests a copy of the Watch Commander's Water Plant Response Log for the incident.
7 However, a copy of the log was not submitted to CDPH until June 25th, 2013. The log
8 confirms that Watch Commander did not speak person to person with WTP staff, the
9 Administrator on Duty, or the Corrections Plant Manager. Per the July 20th, 2011 Water
10 Plant Callout Procedures Operations Plan, Watch Commander's Water Plant Response
11 Log entries are to be at the time of incident and are to be made available to CDPH in a
12 timely manner.

13
14 June 12th, 2013, 11:30 AM: The laboratory contacts the WTP staff informing them that all
15 five bacteriological samples collected the previous day were absent for total and fecal
16 coliform.

17
18 **DIRECTIVES**

19 Calipatria shall hereby comply with the following directives:

- 20
21 1. Forthwith, cease and desist from failing to comply with the WTP operations
22 requirements per CCR, Title 22, Sections 64413.7(c), 64413.5 (d), & 64661.
23 2. **By August 31, 2013**, Calipatria shall submit a revised Operations Plan that includes, at
24 a minimum, the following:

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- a. A revised draft alarm summary table to CDPH for review.
- b. A list of all points of contact for the outgoing autodialer, and a description of what occurs when the end of the call down list is reached without the alarm being acknowledged.
- c. The autodialer shall only call operators with the required level of CDPH operator certification for the WTP's classification that are qualified to make decisions regarding water treatment plant operations.
- d. A section within the operations plan discussing how after hours alarms will be handled in compliance with CCR, Title 22, Sections 64413.7(c), 64413.5 (d), & 64661.

All submittals required by this citation shall be sent to:

Sean Sterchi, P.E.
 District Engineer
 California Department of Public Health
 Drinking Water Program
 1350 Front Street, Room 2050
 San Diego, CA 92101

CIVIL PENALTY

Section 116650 (d) and (e) of the H&S Code provides for the assessment of a penalty for failure to comply with the requirements of the California Safe Drinking Water Act. Failure to

1 comply with any provision of this citation may result in CDPH imposing penalty not to
2 exceed one thousand dollars (\$1,000) per day per violation as of the date of violation of
3 any provision of this citation.

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6/26/13 

Date Sean Sterchi, P.E.
District Engineer
California Department of Public Health
Drinking Water Program

Enclosures: None

cc: Jeff Lamoure, Deputy Director - Division of Environmental Health, Imperial County
Public Health Department

