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**STATE OF CALIFORNIA
CALIFORNIA DEPARTMENT OF PUBLIC HEALTH**

IN RE: City of Torrance
20500 Madrona Avenue
Torrance, CA 90503

TO: Mr. Jack van der Linden, Deputy Public Works Director
City of Torrance

CITATION FOR NONCOMPLIANCE - WATER SYSTEM NO. 1910213

CITATION NO. 04-22-13C-003

Issued on April 15, 2013

Section 116650 of Chapter 4, Part 12, Division 104 of the California Health and Safety Code (H&S Code) 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 thereunder.

The Division of Drinking Water and Environmental Management of the California Department of Public Health (hereinafter, Department) hereby issues a citation to the City of Torrance (hereinafter, City) (mailing address: 20500 Madrona Ave, Torrance, CA 90503) for failure to comply with Section 64445 of Title 22, California Code of Regulations and Condition 18 of Permit Amendment No. PA1910213PA-003.



1 **APPLICABLE AUTHORITIES**
2

3 Section 116650 of H&S Code provides:
4

5 116650. Citations
6

7 (a) *If the Department determines that a public water system is in violation of this*
8 *chapter or any regulation, permit, standard, citation, or order issued or adopted*
9 *thereunder, the Department may issue a citation to the public water system. The*
10 *citation shall be served upon the public water system personally or by certified*
11 *mail. Service shall be deemed effective as of the date of personal service or the*
12 *date of receipt of the certified mail. If a person to whom a citation is directed*
13 *refuses to accept delivery of the certified mail, the date of service shall be*
14 *deemed to be the date of mailing.*
15

16 (b) *Each citation shall be in writing and shall describe the nature of the violation or*
17 *violations, including a reference to the statutory provision, standard, order,*
18 *citation, permit, or regulation alleged to have been violated.*
19

20 (c) *A citation may specify a date for elimination or correction of the condition*
21 *constituting the violation.*
22

23 (d) *A citation may include the assessment of a penalty as specified in subdivision*
24 (i).

25
26 (e) *The Department may assess a penalty in an amount not to exceed one thousand*
27 *dollars (\$1,000) per day for each day that a violation occurred, and for each day*



1 that a violation continues to occur. A separate penalty may be assessed for each
2 violation.

3
4 Title 22, California Code of Regulations, Article 5.5 Primary Standard – Organic
5 Chemicals, Section 64445 states in relevant part:

6
7 64445. Initial Sampling-Organic Chemicals

8
9 (a) *Each community and nontransient noncommunity water system shall collect four*
10 *quarterly samples during the year designated by the Department of each*
11 *compliance period beginning with the compliance period starting January 1, 1993,*
12 *from each water source at a site prior to any treatment and test for all applicable*
13 *organic chemicals listed in Table 64444 A...*

14
15 Condition 18 of Permit Amendment No. 1910213PA-003 provides:

16
17 Condition 18

18
19 *The City shall collect a complete set of Title 22 water quality samples within 60 days*
20 *after Well 9 is placed into service. In addition, the City shall complete the initial*
21 *perchlorate, volatile organic chemicals and radionuclides monitoring for Well 9 within*
22 *one year after the well is placed into service.*



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STATEMENT OF FACTS

Background

The City is bounded by the city of Carson on the east, the cities of Gardena and Lawndale on the north, the city of Redondo Beach on the west and the cities of Palos Verdes Estates, Rolling Hills Estates, and Lomita on the south. The service area of the City’s water system, covering approximately 75 percent of the land within the City limits, is 16.2 square miles. The City’s water supply system currently consists of two active wells, five connections with the Metropolitan Water District of Southern California (MWD), three storage reservoirs and five booster stations. The City also maintains connections with two other water systems (California Water Service Company-Dominguez and the City of Lomita) that either buy or sell water from/to the City. The City serves approximately 115,000 people through 26,539 service connections.

The City is currently operating its water system under a domestic water supply permit (04-07-94P-001) issued by the Department on January 26, 1994 and five permit amendments issued on December 7, 2001, December 19, 2006, August 17, 2008, January 18, 2011, and May 25, 2012.

Permit Amendment No. 1910213PA-003 was issued to the City on January 18, 2011, allowing the City to operate Well 9 and the associated treatment facilities. Condition 18 of the above permit amendment requires the City to complete the initial volatile organic chemicals (VOCs) monitoring for Well 9 within one year after the well is placed into service. The City placed Well 9 into service in March 2011. The City should have completed the collection of four quarters of VOCs samples from Well 9 by April 1,

1 2012, to comply with the initial monitoring requirement of Section 64445 (a) of Title 22,
2 California Code of Regulations and Condition 18 of Permit Amendment No.
3 1910213PA-003.
4

5 **Summary of Event**
6

7 Monday, August 1, 2011

8 The Department sent an e-mail to the West Basin Municipal Water District (WBMWD),
9 who provides monitoring services for the City, to remind them about the initial VOCs
10 monitoring requirement for Well 9 (Attachment A).
11

12 Tuesday, November 8, 2011

13 The Department sent another e-mail reminder to WBMWD regarding the initial VOCs
14 monitoring requirement for Well 9 (Attachment B).
15

16 Monday, November 14, 2011

17 The Department forwarded the City the November 8, 2011 e-mail to WBMWD
18 (Attachment B).
19

20 Tuesday, February 28, 2012

21 The Department sent an e-mail to remind the City about the initial VOCs monitoring
22 requirement for Well 9 (Attachment C).
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1 Wednesday, July 25, 2012

2 The Department reviewed the data in the water quality database and discovered the
3 City had only sampled Well 9 for VOCs on January 14, 2011, November 22, 2011,
4 and February 28, 2012.

5
6 Wednesday, August 15, 2012

7 The Department issued a Notice of Violation (NOV) letter to the City for failure to
8 complete the initial VOC monitoring at Well 9 within one year after the well is placed
9 into service. The City was directed to collect four consecutive quarters of VOCs by
10 September 30, 2013. The City was also reminded in the NOV that any subsequent
11 monitoring, reporting, or public notification violations may result in citations and civil
12 penalties (Attachment D).

13
14 Wednesday, February 20, 2013

15 The City called the Department and reported that WBMWD had not collected the
16 scheduled second quarterly VOC samples from Well 9. A print out from the
17 Department's water quality database is provided in the Attachment E. The first VOCs
18 sample collected from the well after the issuance of NOV was a sample collected on
19 September 17, 2012.

20
21 Monday, February 25, 2013

22 The City provided the Department with a summary of events for the missed VOCs
23 sample in an email (Attachment F).

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DETERMINATIONS

The Department has determined that the City is in violation of Sections 64445 of Title 22, California Code of Regulations and Condition 18 in the Permit Amendment (PA 1910213 PA-003) due to failure to complete the initial VOCs monitoring within one year after the well is placed into service.

DIRECTIVES

The City is hereby directed to take the following actions:

- 1. By **March 31, 2014**, the City shall complete the collection of four consecutive quarters of VOCs samples from Well 9. The analytical result of the VOCs analysis completed in a calendar month shall be reported to the Department no later than the tenth day of the following month.
- 2. By **May 31, 2013**, the City shall submit to the Department the City’s water quality monitoring program improvement plan. The plan shall clearly identify the role and responsibility of all personnel involved in water quality monitoring and compliance tracking duty and the internal control mechanism ensuring all compliance samples are collected in a timely manner.
- 3. The City’s staff responsible for overseeing the compliance with Title 22 monitoring and reporting requirements and staff responsible for collecting the samples shall be fully trained to carry out their duties. By **September 30, 2013**, the City shall submit a letter listing the names of the trainees, contents of the training sections (courses), and dates and locations of these training sections provided. If in-house

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training is used, information regarding the experiences and qualifications of the instructors shall also be provided. The training courses must be related to water quality monitoring, reporting and notification regulations.

- 4. Under the Public Notification Rule, the above monitoring violations are categorized as Tier 3 violations. Section 64463.7 of Title 22, CCR requires that the notification be conducted within one year after the public water system learns of the violation. A template for conducting this notification is provided as Attachment G. The notification must be approved by the Department prior to dissemination. Attachment H shall be used to advise the Department upon completion of the notification.

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 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.

All submittals required by this Citation, shall be submitted to the Department at the following address:

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

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PARTIES BOUND

This Citation shall apply to and be binding upon the City, its officers, managers, agents, employees, contractors, successors and assignees

SEVERABILITY

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

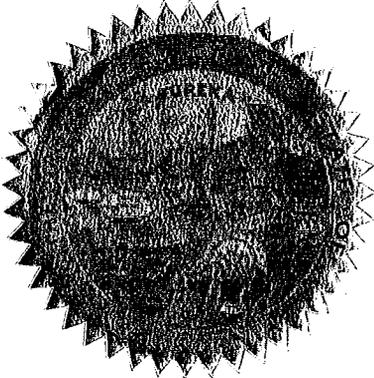
FURTHER ENFORCEMENT ACTION

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 a public water system 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. By issuance of this citation, the Department does not waive any right to take further enforcement action against the City including but not limited to the assessment of civil penalties as authorized by law.

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April 15, 2013
Date

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



BY CERTIFIED MAIL NO. 7008 3230 0001 6331 2072

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Attachments (8):

- A. Email from the Department dated August 1, 2011
- B. Emails from the Department dated November 8, 2011 and November 14, 2011
- C. Email from the Department dated February 28, 2012
- D. August 15, 2012 Notice of Violation Letter (without Enclosures)
- E. Printout of Well 9 VOC monitoring data from the Department's database
- F. Email from the City dated February 25, 2013
- G. Tier 3 Public Notification Template
- H. Proof of Public Notification

Email from the Department dated August 1, 2011

Li, Lei (CDPH-DDWEM)

From: Li, Lei (CDPH-DDWEM)
Sent: Monday, August 01, 2011 1:01 PM
To: Cheryl Ross (cherylr@westbasin.org)
Subject: FW: West Basin Monitoring Schedule
Attachments: torrance q1fy11-12 sched.xls; image001.jpg

Hi Cheryl,

Thank you for the updating. I reviewed the schedule and have a couple of comments

Well 9

- (1) Station code for Well 9 is 1910213-016
- (2) Nitrate (NO3) monitoring frequency should be annually instead of every three years.
- (3) Perchlorate initial monitoring : our database only shows the sample collected in June 2011. No data for January's result. Was the January's result EDTed to the Department?
- (4) Radionuclide initial monitoring:
 - *our database only shows the sample (Radium 228) collected in June 2011. No data for the first quarterly sample. When was the first quarterly sample collected?
 - *Also I only saw Radium 228 in our database, how about the others (Gross A, Radium 226, and Uranium)?
 - *I noticed that you scheduled the next due in August 2011 (q3). If the second quarter (q2) was collected in June, I am wondering how are the four quarters scheduled?
- (5) VOC initial monitoring:
 - Same issues as Radionuclide monitoring.

Madrona Well 2:

I think Fred Molina has discussed with you about the monitoring of TDS, chloride, manganese and sulfate (Special requirement for this well).

Please let me know if you have questions.

Thanks,
Lei

Lei Li

Sanitary Engineer, Angeles District
California Department of Public Health
Southern California Drinking Water Field Operations Branch
500 N. Central Avenue, Suite 500
Glendale, CA 91203

Direct: 818-551-2024
General: 818 551 2004
Fax: 818 551-2054
E-mail: lei.li@cdph.ca.gov

From: Orr, Shu-Fang (CDPH-DDWEM)
Sent: Wednesday, July 13, 2011 2:34 PM
To: Li, Lei (CDPH-DDWEM)
Subject: FW: West Basin Monitoring Schedule

Please review.

Thanks.

Shu-Fang

From: Cheryl Ross [mailto:cherylr@westbasin.org]
Sent: Monday, July 11, 2011 4:58 PM
To: Berndt, Alan; Molina, Fred; Orr, Shu-Fang (CDPH-DDWEM)
Subject: West Basin Monitoring Schedule

Hello Alan, Fred and Shu-Fang – Attached is the Torrance July-September wellhead monitoring schedule that reflects the recently issued CADPH Vulnerability Assessment and Monitoring Guidelines. Please contact me if you have questions.



Cheryl Ross
Environmental Quality Specialist
cherylr@westbasin.org
West Basin Municipal Water District

17140 S. Avalon Blvd. Suite 210
Carson, CA 90746-1269, www.westbasin.org
310.660.6246 fax 310.217.2414 cell 213.500.5050

**Emails from the Department dated November 8, 2011 and
November 14, 2011**

Li, Lei (CDPH-DDWEM)

From: Li, Lei (CDPH-DDWEM)
Sent: Monday, November 14, 2011 9:35 AM
To: Molina, Fred (FMolina@TorranceCA.gov)
Subject: FW: Torrance Oct-Dec sampling schedule
Attachments: torrance q2fy11-12 sched.xls; FW: West Basin Monitoring Schedule; image001.jpg

FYI

From: Li, Lei (CDPH-DDWEM)
Sent: Tuesday, November 08, 2011 2:59 PM
To: Cheryl Ross (cherylr@westbasin.org)
Subject: FW: Torrance Oct-Dec sampling schedule

Hi Cheryl,

Hope all is well.

I noticed that in your schedule, Well 9 was last sampled for VOCs in January 2011 and the next expected sample date is in February 2012 (annually).

Well 9 is supposed to be sampled quarterly for VOCs (required for a new well). I believe that we discussed it before (see the attachment). Our database shows that Well 9 was only sampled on 01/14/2011 for VOCs. Can you please check and let me know?

Thanks,

Lei

From: Orr, Shu-Fang (CDPH-DDWEM)
Sent: Thursday, October 20, 2011 9:01 AM
To: Li, Lei (CDPH-DDWEM)
Subject: FW: Torrance Oct-Dec sampling schedule

Please review and let Cheryl know if you see any errors.

Thanks,

Shu-Fang

From: Cheryl Ross [mailto:cherylr@westbasin.org]
Sent: Tuesday, October 18, 2011 3:46 PM
To: Berndt, Alan; Molina, Fred; Aguiar, John; Orr, Shu-Fang (CDPH-DDWEM)
Subject: Torrance Oct-Dec sampling schedule

Hello Alan, Fred, John and Shu-Fang – Attached is the Torrance Oct-Dec Title 22 monitoring schedule. Please let me know if you have questions or concerns.



Cheryl Ross
Environmental Quality Specialist
cherylr@westbasin.org
West Basin Municipal Water District

17140 S. Avalon Blvd. Suite 210
Carson, CA 90746-1269, www.westbasin.org

Email from the Department dated February 28, 2012

Li, Lei (CDPH-DDWEM)

From: Li, Lei (CDPH-DDWEM)
Sent: Tuesday, February 28, 2012 4:19 PM
To: Molina, Fred (FMolina@TorranceCA.gov)
Subject: Well 9 initial monitoring

Hi Fred,
Hope all is well.

Just a reminder about the initial monitoring for Well 9. Torrance needs to collect the last quarterly radionuclide samples by Feb, 2012.

Also please make sure the VOCs at well 9 are collected quarterly.

Thanks,

Lei

Attachment D

**August 15, 2012 Notice of Violation Letter
(without Enclosures)**



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

August 15, 2012

Jack van der Linden
Deputy Public Works Director
City of Torrance
20500 Madrona Avenue
Torrance, CA 90503

Dear Mr. van der Linden:

SYSTEM NO. 1910213 – VOLATILE ORGANIC CHEMICALS (VOCs) MONITORING VIOLATION, WELL 9 (PS CODE 1910213-016)

The purpose of this letter is to notify you that the City of Torrance (City) has violated the VOCs monitoring requirements for failure to complete the initial VOC monitoring at Well 9 within one year after the well is placed into service.

Section 64445, Chapter 15, Title 22, Initial Sampling –Organic Chemicals

Section 64445, Title 22, California Code of Regulations (CCR) requires that each community and nontransient-noncommunity water system shall collect four quarterly samples during the year designated by the Department of each compliance period beginning with the compliance period starting January 1, 1993, from each water source at a site prior to any treatment and test for all applicable organic chemicals listed in Table 64444-A. A copy of the *Primary Standards –Organic Chemicals* regulations is enclosed (*Enclosure A*).

Permit Amendment PA 1910213PA-003

The Department issued the City a permit amendment (PA 1910213PA-003) in January 2011, for the City to operate Well 9 and the associated treatment facilities. Condition 18 of the said permit amendment provides: The City shall collect a complete set of Title 22 water quality samples within 60 days after Well 9 is placed into service. In addition, the City shall complete the initial perchlorate, volatile organic chemicals and radionuclides monitoring for Well 9 within one year after the well is placed into service. In Section 3.3 of the engineering report for the issuance of the permit amendment, the Department

Mr. Jack van der Linden
Page 2
August 15, 2012

clearly spelled out that the initial VOCs monitoring consists of four consecutive quarters of samples.

Well 9 was placed into service in March 2011. Since the issuance of the permit amendment, the Department has reminded the City and the West Basin Municipal Water District, who provides monitoring services for the City, several times by emails (*Enclosure B*) and phone calls of the quarterly VOCs monitoring requirements.

A printout from the Department's water quality database (*Enclosure C*) shows that by the end of the July 2012, the City has only sampled Well 9 for VOCs on January 14, 2011 (first calendar quarter), November 22, 2011 (fourth calendar quarter) and February 28, 2012 (again, the first calendar quarter). The City confirmed in an email dated August 7, 2012 that no other quarterly VOC samples had been collected from Well 9. **Hence, the City violated (1) the monitoring requirement of Section 64445, Title 22, CCR and (2) the monitoring requirement of Condition 18, permit amendment PA 1910213PA-003.**

The City can return to compliance with the initial VOCs monitoring requirement by collecting four consecutive quarters of VOCs from Well 9. The initial monitoring shall be completed no later than September 30, 2013. The analytical result of the VOC analysis completed in a calendar month shall be reported to the Department no later than the tenth day of the following month.

Public Notification

Under the *Public Notification Rule*, the above monitoring violations are categorized as Tier 3 violations. Section 64463.7 of Title 22, CCR requires that the notification be conducted within one year after the public water system learns of the violation, and may be part of the Consumer Confidence Report. The City must deliver the notice to water users within the required time period by mail or direct delivery. In addition, the City must use one or more of the following methods to reach persons not likely to be reached by a mailing or direct delivery (renters, university students, nursing home patients, prison inmates, etc): 1) publication in a local newspaper, 2) posting in conspicuous public places served by the City or on the Internet; or 3) delivery to community organizations. A template for conducting this notification is provided as *Enclosure D*. The notification must be approved by the Department prior to dissemination. *Enclosure E* shall be used to advise the Department upon completion of the notification.

You are hereby reminded that any subsequent monitoring, reporting, or public notification violations may result in citations and civil penalties.

Mr. Jack van der Linden
Page 3
August 15, 2012

If you have any questions regarding this matter, please contact Ms. Lei Li, P.E. at (818) 551-2024 or me at (818) 551-2045.

Sincerely,



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

Enclosures:

- A. Article 5.5, Chapter 15, Title 22
- B. Email correspondences regarding Well 9 initial monitoring
- C. Printout of Well 9 VOCs monitoring data from the Department's Database
- D. Tier 3 Public Notification Template
- E. Proof of Public Notification

cc: Mr. Alan Berndt
Senior Water Service Supervisor
Public Works Department
City of Torrance
20500 Madrona Ave.
Torrance, CA 90503

Mr. Fred Molina
Senior Water Quality Inspector
Public Works Department
City of Torrance
20500 Madrona Ave.
Torrance, CA 90503

**Printout of Well 9 VOC monitoring data from the Department's
database**

DRINKING WATER ANALYSES RESULTS REPORT
ALL SAMPLES FOR SELECTED CHAPTER 15 GROUPS - ALL RESULTS
FOR SAMPLE DATE RANGE OF 20100101 THRU 20130301
REPORT OF COUNTY: 19 LOS ANGELES

SYSTEM NO: 1910213 NAME: TORRANCE-CITY, WATER DEPT. COUNTY: LOS ANGELES
SOURCE NO: 016 NAME: WELL 09 PSCODE: 1910213-016 CLASS: LGLJ STATUS: AR

GROUP IDENTIFICATION	CONSTITUENT IDENTIFICATION	SAMPLE DATE	RESULT *	MCL	DLR	TRIGGER	UNIT
S1	REGULATED VOC						
34030	BENZENE	01/14/2011	< .5000 *	1.0000	.5000	.5000	UG/L
34030	BENZENE	11/22/2011	< .0000	1.0000	.5000	.5000	UG/L
34030	BENZENE	02/28/2012	< .0000	1.0000	.5000	.5000	UG/L
34030	BENZENE	09/17/2012	< .5000 *	1.0000	.5000	.5000	UG/L
32102	CARBON TETRACHLORIDE	01/14/2011	< .5000 *	.5000	.5000	.5000	UG/L
32102	CARBON TETRACHLORIDE	11/22/2011	< .0000	.5000	.5000	.5000	UG/L
32102	CARBON TETRACHLORIDE	02/28/2012	< .0000	.5000	.5000	.5000	UG/L
32102	CARBON TETRACHLORIDE	09/17/2012	< .5000 *	.5000	.5000	.5000	UG/L
77093	CIS-1,2-DICHLOROETHYLENE	01/14/2011	< .5000 *	6.0000	.5000	.5000	UG/L
77093	CIS-1,2-DICHLOROETHYLENE	11/22/2011	< .0000	6.0000	.5000	.5000	UG/L
77093	CIS-1,2-DICHLOROETHYLENE	02/28/2012	< .0000	6.0000	.5000	.5000	UG/L
77093	CIS-1,2-DICHLOROETHYLENE	09/17/2012	< .5000 *	6.0000	.5000	.5000	UG/L
34423	DICHLOROMETHANE	01/14/2011	< .5000 *	5.0000	.5000	.5000	UG/L
34423	DICHLOROMETHANE	11/22/2011	< .0000	5.0000	.5000	.5000	UG/L
34423	DICHLOROMETHANE	02/28/2012	< .0000	5.0000	.5000	.5000	UG/L
34423	DICHLOROMETHANE	09/17/2012	< .5000 *	5.0000	.5000	.5000	UG/L
34371	ETHYLBENZENE	01/14/2011	< .5000 *	300.0000	.5000	.5000	UG/L
34371	ETHYLBENZENE	11/22/2011	< .0000	300.0000	.5000	.5000	UG/L
34371	ETHYLBENZENE	02/28/2012	< .0000	300.0000	.5000	.5000	UG/L
34371	ETHYLBENZENE	09/17/2012	< .5000 *	300.0000	.5000	.5000	UG/L
46491	METHYL-TERT-BUTYL-ETHER (MTBE)	01/14/2011	< 3.0000 *	5.0000	3.0000	3.0000	UG/L
46491	METHYL-TERT-BUTYL-ETHER (MTBE)	11/22/2011	< .0000	5.0000	3.0000	3.0000	UG/L
46491	METHYL-TERT-BUTYL-ETHER (MTBE)	02/28/2012	< .0000	5.0000	3.0000	3.0000	UG/L
46491	METHYL-TERT-BUTYL-ETHER (MTBE)	09/17/2012	< 3.0000 *	5.0000	3.0000	3.0000	UG/L
34301	MONOCHLOROETHYLENE	01/14/2011	< .5000 *	70.0000	.5000	.5000	UG/L
34301	MONOCHLOROETHYLENE	11/22/2011	< .0000	70.0000	.5000	.5000	UG/L
34301	MONOCHLOROETHYLENE	02/28/2012	< .0000	70.0000	.5000	.5000	UG/L
34301	MONOCHLOROETHYLENE	09/17/2012	< .5000 *	70.0000	.5000	.5000	UG/L
77128	STYRENE	01/14/2011	< .5000 *	100.0000	.5000	.5000	UG/L
77128	STYRENE	11/22/2011	< .0000	100.0000	.5000	.5000	UG/L
77128	STYRENE	02/28/2012	< .0000	100.0000	.5000	.5000	UG/L
77128	STYRENE	09/17/2012	< .5000 *	100.0000	.5000	.5000	UG/L
34475	TETRACHLOROETHYLENE	01/14/2011	< .5000 *	5.0000	.5000	.5000	UG/L
34475	TETRACHLOROETHYLENE	11/22/2011	< .0000	5.0000	.5000	.5000	UG/L
34475	TETRACHLOROETHYLENE	02/28/2012	< .0000	5.0000	.5000	.5000	UG/L
34475	TETRACHLOROETHYLENE	09/17/2012	< .5000 *	5.0000	.5000	.5000	UG/L

NOTE1: * = RESULT IS EQUAL TO OR GREATER THAN TRIGGER
NOTE2: .000 = RESULT WAS REPORTED AS NON-DETECTED EXCEPT FOR RAD

DRINKING WATER ANALYSES RESULTS REPORT
ALL SAMPLES FOR SELECTED CHAPTER 15 GROUPS - ALL RESULTS
FOR SAMPLE DATE RANGE OF 20100101 THRU 20130301
REPORT OF COUNTY: 19 LOS ANGELES

SYSTEM NO: 1910213 NAME: TORRANCE-CITY, WATER DEPT. COUNTY: LOS ANGELES
SOURCE NO: 016 NAME: WELL 09 PSCODE: 1910213-016 CLASS: LGLJ STATUS: AR

GROUP IDENTIFICATION	CONSTITUENT IDENTIFICATION	SAMPLE DATE	RESULT *	MCL	DLR	TRIGGER	UNIT
34010	TOLUENE	01/14/2011	< .5000 *	150.0000	.5000	.5000	UG/L
34010	TOLUENE	11/22/2011	< .0000	150.0000	.5000	.5000	UG/L
34010	TOLUENE	02/28/2012	< .0000	150.0000	.5000	.5000	UG/L
34010	TOLUENE	09/17/2012	< .5000 *	150.0000	.5000	.5000	UG/L
34546	TRANS-1,2-DICHLOROETHYLENE	01/14/2011	< .5000 *	10.0000	.5000	.5000	UG/L
34546	TRANS-1,2-DICHLOROETHYLENE	11/22/2011	< .0000	10.0000	.5000	.5000	UG/L
34546	TRANS-1,2-DICHLOROETHYLENE	02/28/2012	< .0000	10.0000	.5000	.5000	UG/L
34546	TRANS-1,2-DICHLOROETHYLENE	09/17/2012	< .5000 *	10.0000	.5000	.5000	UG/L
39180	TRICHLOROETHYLENE	01/14/2011	< .5000 *	5.0000	.5000	.5000	UG/L
39180	TRICHLOROETHYLENE	11/22/2011	< .0000	5.0000	.5000	.5000	UG/L
39180	TRICHLOROETHYLENE	02/28/2012	< .0000	5.0000	.5000	.5000	UG/L
39180	TRICHLOROETHYLENE	09/17/2012	< .5000 *	5.0000	.5000	.5000	UG/L
34488	TRICHLOROFLUOROMETHANE	01/14/2011	< 5.0000 *	150.0000	5.0000	5.0000	UG/L
34488	TRICHLOROFLUOROMETHANE	11/22/2011	< .0000	150.0000	5.0000	5.0000	UG/L
34488	TRICHLOROFLUOROMETHANE	02/28/2012	< .0000	150.0000	5.0000	5.0000	UG/L
34488	TRICHLOROFLUOROMETHANE	09/17/2012	< 5.0000 *	150.0000	5.0000	5.0000	UG/L
39175	VINYL CHLORIDE	01/14/2011	< .5000 *	.5000	.5000	.5000	UG/L
39175	VINYL CHLORIDE	11/22/2011	< .0000	.5000	.5000	.5000	UG/L
39175	VINYL CHLORIDE	02/28/2012	< .0000	.5000	.5000	.5000	UG/L
39175	VINYL CHLORIDE	09/17/2012	< .5000 *	.5000	.5000	.5000	UG/L
81551	XYLENES (TOTAL)	01/14/2011	< 1.0000	1,750.0000	-----	1,750.0000	UG/L
81551	XYLENES (TOTAL)	11/22/2011	< .0000	1,750.0000	-----	1,750.0000	UG/L
81551	XYLENES (TOTAL)	02/28/2012	< .0000	1,750.0000	-----	1,750.0000	UG/L
81551	XYLENES (TOTAL)	09/17/2012	< .5000	1,750.0000	-----	1,750.0000	UG/L
34496	1,1-DICHLOROETHANE	01/14/2011	< .5000 *	5.0000	.5000	.5000	UG/L
34496	1,1-DICHLOROETHANE	11/22/2011	< .0000	5.0000	.5000	.5000	UG/L
34496	1,1-DICHLOROETHANE	02/28/2012	< .0000	5.0000	.5000	.5000	UG/L
34496	1,1-DICHLOROETHANE	09/17/2012	< .5000 *	5.0000	.5000	.5000	UG/L
34501	1,1-DICHLOROETHYLENE	01/14/2011	< .5000 *	6.0000	.5000	.5000	UG/L
34501	1,1-DICHLOROETHYLENE	11/22/2011	< .0000	6.0000	.5000	.5000	UG/L
34501	1,1-DICHLOROETHYLENE	02/28/2012	< .0000	6.0000	.5000	.5000	UG/L
34501	1,1-DICHLOROETHYLENE	09/17/2012	< .5000 *	6.0000	.5000	.5000	UG/L
34506	1,1,1-TRICHLOROETHANE	01/14/2011	< .5000 *	200.0000	.5000	.5000	UG/L
34506	1,1,1-TRICHLOROETHANE	11/22/2011	< .0000	200.0000	.5000	.5000	UG/L

Sample ID	Chemical Name	Date	Result	Trigger	MCL	DLR	Unit
34506	1,1,1-TRICHLOROETHANE	02/28/2012	< .0000	200.0000	.5000	.5000	UG/L
34506	1,1,1-TRICHLOROETHANE	09/17/2012	< .5000 *	200.0000	.5000	.5000	UG/L
81611	1,1,2-TRICHLORO-1,2,2-TRIFLUOROETHANE	01/14/2011	< 10.0000 *	1,200.0000	10.0000	10.0000	UG/L
81611	1,1,2-TRICHLORO-1,2,2-TRIFLUOROETHANE	11/22/2011	< .0000	1,200.0000	10.0000	10.0000	UG/L

NOTE1: * = RESULT IS EQUAL TO OR GREATER THAN TRIGGER
 NOTE2: .000 = RESULT WAS REPORTED AS NON-DETECTED EXCEPT FOR RAD

1

DATE: 03/01/13
 REPORT: R-040/2-3

STATE OF CALIFORNIA
 DRINKING WATER PROGRAM

PAGE: 3

DRINKING WATER ANALYSES RESULTS REPORT
 ALL SAMPLES FOR SELECTED CHAPTER 15 GROUPS - ALL RESULTS
 FOR SAMPLE DATE RANGE OF 20100101 THRU 20130301
 REPORT OF COUNTY: 19 LOS ANGELES

SYSTEM NO: 1910213 NAME: TORRANCE-CITY, WATER DEPT.
 SOURCE NO: 016 NAME: WELL 09

COUNTY: LOS ANGELES
 PSCODE: 1910213-016

CLASS: LGLJ STATUS: AR

GROUP IDENTIFICATION	CONSTITUENT IDENTIFICATION	SAMPLE DATE	RESULT *	MCL	DLR	TRIGGER	UNIT
81611	1,1,2-TRICHLORO-1,2,2-TRIFLUOROETHANE	02/28/2012	< .0000	1,200.0000	10.0000	10.0000	UG/L
81611	1,1,2-TRICHLORO-1,2,2-TRIFLUOROETHANE	09/17/2012	< 10.0000 *	1,200.0000	10.0000	10.0000	UG/L
34511	1,1,2-TRICHLOROETHANE	01/14/2011	< .5000 *	5.0000	.5000	.5000	UG/L
34511	1,1,2-TRICHLOROETHANE	11/22/2011	< .0000	5.0000	.5000	.5000	UG/L
34511	1,1,2-TRICHLOROETHANE	02/28/2012	< .0000	5.0000	.5000	.5000	UG/L
34511	1,1,2-TRICHLOROETHANE	09/17/2012	< .5000 *	5.0000	.5000	.5000	UG/L
34516	1,1,2,2-TETRACHLOROETHANE	01/14/2011	< .5000 *	1.0000	.5000	.5000	UG/L
34516	1,1,2,2-TETRACHLOROETHANE	11/22/2011	< .0000	1.0000	.5000	.5000	UG/L
34516	1,1,2,2-TETRACHLOROETHANE	02/28/2012	< .0000	1.0000	.5000	.5000	UG/L
34516	1,1,2,2-TETRACHLOROETHANE	09/17/2012	< .5000 *	1.0000	.5000	.5000	UG/L
34536	1,2-DICHLOROBENZENE	01/14/2011	< .5000 *	600.0000	.5000	.5000	UG/L
34536	1,2-DICHLOROBENZENE	11/22/2011	< .0000	600.0000	.5000	.5000	UG/L
34536	1,2-DICHLOROBENZENE	02/28/2012	< .0000	600.0000	.5000	.5000	UG/L
34536	1,2-DICHLOROBENZENE	09/17/2012	< .5000 *	600.0000	.5000	.5000	UG/L
34531	1,2-DICHLOROETHANE	01/14/2011	< .5000 *	.5000	.5000	.5000	UG/L
34531	1,2-DICHLOROETHANE	11/22/2011	< .0000	.5000	.5000	.5000	UG/L
34531	1,2-DICHLOROETHANE	02/28/2012	< .0000	.5000	.5000	.5000	UG/L
34531	1,2-DICHLOROETHANE	09/17/2012	< .5000 *	.5000	.5000	.5000	UG/L
34541	1,2-DICHLOROPROPANE	01/14/2011	< .5000 *	5.0000	.5000	.5000	UG/L
34541	1,2-DICHLOROPROPANE	11/22/2011	< .0000	5.0000	.5000	.5000	UG/L
34541	1,2-DICHLOROPROPANE	02/28/2012	< .0000	5.0000	.5000	.5000	UG/L
34541	1,2-DICHLOROPROPANE	09/17/2012	< .5000 *	5.0000	.5000	.5000	UG/L
34551	1,2,4-TRICHLOROBENZENE	01/14/2011	< .5000	5.0000	.5000	5.0000	UG/L
34551	1,2,4-TRICHLOROBENZENE	11/22/2011	< .0000	5.0000	.5000	5.0000	UG/L
34551	1,2,4-TRICHLOROBENZENE	02/28/2012	< .0000	5.0000	.5000	5.0000	UG/L
34551	1,2,4-TRICHLOROBENZENE	09/17/2012	< .5000	5.0000	.5000	5.0000	UG/L
34561	1,3-DICHLOROPROPENE (TOTAL)	01/14/2011	< .5000 *	.5000	.5000	.5000	UG/L
34561	1,3-DICHLOROPROPENE (TOTAL)	11/22/2011	< .0000	.5000	.5000	.5000	UG/L
34561	1,3-DICHLOROPROPENE (TOTAL)	02/28/2012	< .0000	.5000	.5000	.5000	UG/L
34561	1,3-DICHLOROPROPENE (TOTAL)	09/17/2012	< .5000 *	.5000	.5000	.5000	UG/L
34571	1,4-DICHLOROBENZENE	01/14/2011	< .5000 *	5.0000	.5000	.5000	UG/L
34571	1,4-DICHLOROBENZENE	11/22/2011	< .0000	5.0000	.5000	.5000	UG/L
34571	1,4-DICHLOROBENZENE	02/28/2012	< .0000	5.0000	.5000	.5000	UG/L
34571	1,4-DICHLOROBENZENE	09/17/2012	< .5000 *	5.0000	.5000	.5000	UG/L

NOTE1: * = RESULT IS EQUAL TO OR GREATER THAN TRIGGER
 NOTE2: .000 = RESULT WAS REPORTED AS NON-DETECTED EXCEPT FOR RAD

Email from the City dated February 25 , 2013

Li, Lei (CDPH-DDWEM)

From: Berndt, Alan <ABERNDT@TorranceCA.gov>
Sent: Monday, February 25, 2013 10:43 AM
To: Orr, Shu-Fang (CDPH-DDWEM); Li, Lei (CDPH-DDWEM)
Subject: FW: XI0000023.xls
Attachments: XI0000023.xls

Shu-Fang

Below is the chain of events that took place for the missed sample for VOC. Also attached is a calendar we received from West Basin (Cheryl Ross) showing that the sample for November was completed.

Based on these chain of events we are looking into bringing the samples for well head monitoring in house or contracting with the Water Replenishment District to perform this service. Either way we will not be contracting with West Basin to perform any sampling for the us.

We are asking for your consideration to extend the violation monitoring due date to December 1st which will give us 4 quarters of sampling to bring us in compliance.

Alan Berndt

Senior Water Service Supervisor | Public Works
City of Torrance | 20500 Madrona Avenue | Torrance CA 90503 | 310.781.6900 phone | 310.781.6902 fax |
aberndt@TorranceCA.Gov | www.TorranceCA.Gov

From: Molina, Fred
Sent: Thursday, February 21, 2013 4:26 PM
To: Berndt, Alan
Cc: Aguiar, John
Subject: XI0000023.xls

Alan this is the schedule that shows well 9 was sampled fro VOC's in November of 2012.

Events leading up to the discovery of the failure to sample/test VOC's for four consecutive quarters of a new well, (well 9).

2-20-13: 9:00am You asked for Well 9 VOC results for 2012, for public notification.

2-20-13: 9:15am I contacted Cheryl Ross by telephone that it seemed that Well 9 was not sampled for VOC's even though it was scheduled for sampling. She said she would contact the lab (Eaton Analytical) to see if it in fact was not sampled for VOC's. She called me back and confirmed that Well 9 was not sampled for VOC's. She explained that the Lab was at fault for sample omission as it was on the schedule. She also stated that around this time MWH had become Eaton Analytical and there were issues in the changeover that may have caused this glaring mistake. My belief is that the problem was in fact due to the Lab not processing the correct bottle order.

2-20-13: 11:00am I met with you in your office with Chuck Schaich present, to explain what Cheryl Ross had told me regarding the failure to sample for quarterly VOC's. At which time you called Shu Fang.

2-21-13: 8:30am I called Cheryl Ross to ask her if she could send me an e-mail or some kind of document explaining why samples were not collected for VOC's, and what would be done so as this will not happen again in the future.

In closing this is a rough estimate as to how and when we discovered the VOC sample omission for November. Dates are accurate, times are estimated. Any other questions contact me and hopefully I can answer them. We are currently waiting for a response from Cheryl Ross as to why this occurred, What happened, and what will be done in the future to assure us that this can never happen again.

Regards Fred Molina

Tier 3 Public Notification Template

Instructions for Tier 3 Monitoring Violations Annual Notice Template

Template Attached

Since most monitoring violations are included in Tier 3, you must provide public notice to persons served within one year after you learn of the violation [California Code of Regulations, Title 22, Chapter 15, Section 64463.7(b)]. Multiple monitoring violations can be serious. **Each water system required to give public notice must submit the notice to the Department for approval prior to distribution or posting, unless otherwise directed by the Department [64463(b)].**

Notification Methods

You must use the methods summarized in the table below to deliver the notice to consumers. If you mail, post, or hand deliver, print your notice on letterhead, if available.

<i>If You Are a...</i>	<i>You Must Notify Consumers by...</i>	<i>...and By One or More of the Following Methods to Reach Persons Not Likely to be Reached by the Previous Method...</i>
Community Water System [64463.7(c)(1)]	Mail or direct delivery ^(a)	Publication in a local newspaper
		Posting ^(b) in conspicuous public places served by the water system or on the Internet
		Delivery to community organizations
Non-Community Water System [64463.7(c)(2)]	Posting in conspicuous locations throughout the area served by the water system ^(b)	Publication in a local newspaper or newsletter distributed to customers
		Email message to employees or students
		Posting ^(b) on the Internet or intranet
		Direct delivery to each customer

(a) Notice must be distributed to each customer receiving a bill including those that provide their drinking water to others (e.g., schools or school systems, apartment building owners, or large private employers), and other service connections to which water is delivered by the water system.

(b) Notice must be posted in place for as long as the violation or occurrence continues, but in no case less than seven days.

The notice attached is appropriate for the methods described above, insertion in an annual notice, or included in the Consumer Confidence Report¹. However, you may wish to modify it before using it for posting. If you do, you must still include all the required elements and leave the standard language for monitoring and testing procedure violations and notification language in italics unchanged. This language is mandatory [64465].

¹ CCR may be used as long as public notification timing and delivery requirements are met [64463.7(d)].

You may need to modify the template for a notice for individual monitoring violations. The template presents violations in a table; however, you may write out an explanation for each violation if you wish. For any monitoring violation for volatile organic compounds (VOCs) or other groups, you may list the group name in the table, but you must provide the name of every chemical in the group on the notice (e.g., in a footnote). An example is shown in the table below.

<i>Contaminant</i>	<i>Required Sampling Frequency</i>	<i>Number of Samples Taken</i>	<i>When All Samples Should Have Been Taken</i>	<i>When Samples Were or Will Be Taken</i>
VOCs ^(a)	1 sample every 3 years	None	2002 – 2005	February 2006

(a) Benzene; Carbon Tetrachloride; 1,2-Dichlorobenzene; 1,4-Dichlorobenzene; 1,1-Dichloroethane; 1,2-Dichloroethane; 1,1-Dichloroethylene; cis-1,2-Dichloroethylene; trans-1,2-Dichloroethylene; Dichloromethane; 1,2-Dichloropropane; 1,3-Dichloropropene; Ethylbenzene; Methyl-*tert*-butyl ether; Monochlorobenzene; Styrene; 1,1,2,2-Tetrachloroethane; Tetrachloroethylene; Toluene; 1,2,4-Trichlorobenzene; 1,1,1-Trichloroethane; 1,1,2-Trichloroethane; Trichloroethylene; Trichlorofluoromethane; 1,1,2-Trichloro-1,2,2-Trifluoroethane; Vinyl Chloride; and Xylenes.

You may need to modify the notice if you had any monitoring violations for which monitoring later showed a maximum contaminant level or other violation. In such cases, you should refer to the public notice you issued at that time.

Multilingual Requirement

Spanish. Each public notice must contain information in Spanish regarding (1) the importance of the notice or (2) contain a telephone number or address where Spanish-speaking residents may contact the water system to obtain a translated copy of the public notice or assistance in Spanish.

Non-English Speaking Groups Other than Spanish-Speaking. For each group that exceeds 1,000 residents or 10% of the residents in the community served, whichever is less, the public notice must (1) contain information in the appropriate language(s) regarding the importance of the notice or (2) contain a telephone number or address where such residents may contact the water system to obtain a translated copy of the notice or assistance in the appropriate language.

Population Served

Make sure it is clear who is served by your water system -- you may need to list the areas you serve.

Corrective Actions

In your notice, describe corrective actions you took or are taking. Listed below are some steps commonly taken by water systems with monitoring violations. Choose the appropriate language, or develop your own:

- “We have since taken the required samples, as described in the last column of the table above. The samples showed we are meeting drinking water standards.”
- “We have since taken the required samples, as described in the last column of the table above. The sample for [contaminant] exceeded the limit. [Describe corrective action; use information from public notice prepared for violating the limit.]”
- “We plan to take the required samples soon, as described in the last column of the table above.”

After Issuing the Notice

Send a copy of each type of notice and a certification that you have met all the public notice requirements to the Department within ten days after you issue the notice [64469(d)]. You should also issue a follow-up notice in addition to meeting any repeat notice requirements the Department sets.

It is recommended that you notify health professionals in the area of the violation. People may call their doctors with questions about how the violation may affect their health, and the doctors should have the information they need to respond appropriately.

It is a good idea to issue a “problem corrected” notice when the violation is resolved.

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.

**Monitoring Requirements Not Met for
[System]**

Our water system failed to monitor as required for drinking water standards during the past year and, therefore, was in violation of the regulations. Even though this failure 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 are required to monitor your drinking water for specific contaminants on a regular basis. Results of regular monitoring are an indicator of whether or not our drinking water meets health standards. During [compliance period dates], we [‘did not monitor or test’ or ‘did not complete all monitoring or testing’] for [contaminant(s)] and therefore, cannot be sure of the quality of our drinking water during that time.

What should I do?

- There is nothing you need to do at this time.
- The table below lists the contaminant(s) we did not properly test for during the last year, how many samples we are required to take and how often, how many samples we took, when samples should have been taken, and the date on which follow-up samples were (or will be) taken.

<i>Contaminant</i>	<i>Required Sampling Frequency</i>	<i>Number of Samples Taken</i>	<i>When All Samples Should Have Been Taken</i>	<i>When Samples Were or Will Be Taken</i>
	[number] sample every [number][time interval]			

- If you have 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 [system].

State Water System ID#: _____. Date distributed: _____.

Proof of Public Notification

PROOF OF NOTIFICATION

Name of Water System: City of Torrance

System Number: 1910213

**Certification of Notification for
Initial Volatile Organic Chemicals (VOCs) Monitoring Violation**

As required by *California Code of Regulations*, Title 22, Section 64463.7, I notified the users of the water supplied by the City of Torrance of the violation of Section 64445, Title 22, *CCR*. I complied with the requirement to conduct public notification as indicated below:

<u>Required Action (indicate all that were used)</u>	<u>Date Completed</u>
Public Notification – Hand Delivery	<input type="text"/>
Public Notification - Mail Delivery	<input type="text"/>
Public Notification – Continuous Posting	<input type="text"/>
Public Notification - Consumer Confidence Report	<input type="text"/>
Public Notification - Other method Specify other method used: _____	<input type="text"/>

Signature of Water System Representative

Date

ATTACH A COPY OF THE NOTICE USED.

THIS FORM MUST BE COMPLETED AND RETURNED TO THE DEPARTMENT