

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

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

**IN RE:** City of Beverly Hills Water System  
Public Works & Transportation  
345 Foothill Road  
Beverly Hills, CA 90210-4876

**TO:** Mr. Kevin Watson, Water Operations Manager  
City of Beverly Hills

**CITATION FOR NONCOMPLIANCE - WATER SYSTEM NO. 1910156**

**CITATION NO. 04-22-13C-004**

**Issued on March 14, 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 Beverly Hills (hereinafter, City) (mailing address: 345 Foothill Road, Beverly Hills, CA 90210) for failure to comply with Sections 64423.1(c)(3), 64426, 64426.1 and 64463.4 of Title 22, California Code of Regulations.



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

**APPLICABLE AUTHORITIES**

Section 116650 of H&S Code provides:

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*

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 3 Primary Standard – Bacteriological  
5           Quality, Sections 64423.1, 64426 and 64426.1 state in relevant parts:

6  
7           64423.1. Sample Analysis and Reporting of Results.

8  
9           (c) *Analytical results of all required samples collected for a system in a calendar*  
10           *month shall be reported to the Department not later than the tenth day of the*  
11           *following month, as follows:*

12           (1) *The water supplier shall submit a monthly summary of the bacteriological*  
13           *monitoring results to the Department.*

14           (2) *For systems serving fewer than 10,000 service connections or 33,000*  
15           *persons, the water supplier shall require the laboratory to submit copies of*  
16           *all required bacteriological monitoring results directly to the Department.*

17           (3) *For systems serving more than 10,000 service connections, or 33,000*  
18           *persons, the water supplier shall require the laboratory to submit copies of*  
19           *bacteriological monitoring results for all positive routine samples and all*  
20           *repeat samples directly to the Department.*

21  
22           64426. Significant Rise in Bacterial Count.

23  
24           (a) *Any of the following criteria shall indicate a possible significant rise in bacterial*  
25           *count:*



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

- (1) A system collecting at least 40 samples per month has a total coliform-positive routine sample followed by two total coliform-positive repeat samples in the repeat sample set;
- (2) A system has a sample which is positive for fecal coliform or *E. coli*; or
- (3) A system fails the total coliform Maximum Contaminant Level (MCL) as defined in Section 64426.1.

(b) When the coliform levels specified in subsection (a) are reached or exceeded, the water supplier shall:

- (1) Contact the Department by the end of the day on which the system is notified of the test result or the system determines that it has exceeded the MCL, unless the notification or determination occurs after the Department office is closed, in which case the supplier shall notify the Department within 24 hours; and
- (2) Submit to the Department information on the current status of physical works and operating procedures which may have caused the elevated bacteriological findings, or any information on community illness suspected of being waterborne. This shall include, but not be limited to:
  - (A) Current operating procedures that are or could potentially be related to the increase in bacterial count;
  - (B) Any interruptions in the treatment process;
  - (C) System pressure loss to less than 5 psi;
  - (D) Vandalism and/or unauthorized access to facilities;
  - (E) Physical evidence indicating bacteriological contamination of facilities;
  - (F) Analytical results of any additional samples collected, including source samples;
  - (G) Community illness suspected of being waterborne; and



1 (H) Records of the investigation and any action taken.  
2

3 (c) Upon receiving notification from the Department of a significant rise in bacterial  
4 count, the water supplier shall implement the emergency notification plan  
5 required by Section 116460, Health and Safety Code.  
6

7 64426.1. Total Coliform Maximum Contaminant Level (MCL).  
8

9 (a) Results of all samples collected in a calendar month pursuant to Sections 64423,  
10 64424, and 64425 that are not invalidated by the Department or the laboratory  
11 shall be included in determining compliance with the total coliform MCL. Special  
12 purpose samples such as those listed in Section 64421(b) and samples collected  
13 by the water supplier during special investigations shall not be used to determine  
14 compliance with the total coliform MCL.

15 (b) A public water system is in violation of the total coliform MCL when any of the  
16 following occurs:

17 (1) For a public water system which collects at least 40 samples per month, more  
18 than 5.0 percent of the samples collected during any month are total coliform-  
19 positive; or

20 (2) For a public water system which collects fewer than 40 samples per month,  
21 more than one sample collected during any month is total coliform-positive; or

22 (3) Any repeat sample is fecal coliform-positive or *E. coli*-positive; or

23 (4) Any repeat sample following a fecal coliform-positive or *E. coli*-positive routine  
24 sample is total coliform-positive.

25 (c) If a public water system is not in compliance with paragraphs (b)(1) through (4),  
26 during any month in which it supplies water to the public, the water supplier shall  
27 notify the Department by the end of the business day on which this is



1 determined, unless the determination occurs after the Department office is  
2 closed, in which case the supplier shall notify the Department within 24 hours of  
3 the determination. The water supplier shall also notify the consumers served by  
4 the water system. A Tier 2 Public Notice shall be given for violations of  
5 paragraphs (b)(1) or (2), pursuant to Section 64463.4. A Tier 1 Public Notice  
6 shall be given for violations of paragraphs (b)(3) or (4), pursuant to Section  
7 64463.1.

8  
9 64463.4. Tier 2 Public Notice.

10 (a) A water system shall give public notice pursuant to this section if any of the  
11 following occurs:

12 (1) Any violation of the MCL, MRDL, and treatment technique requirements,  
13 except:

14 (A) Where a Tier 1 public notice is required under Section 64463.1; or

15 (B) Where the Department determines that a Tier 1 public notice is  
16 required, based on potential health impacts and persistence of the  
17 violations...

18  
19 (b) A water system shall give the notice as soon as possible within 30 days after it  
20 learns of a violation or occurrence specified in subsection (a), except that the  
21 system may request an extension of up to 60 days for providing the notice. This  
22 extension would be subject to the Department's written approval based on the  
23 violation or occurrence having been resolved and the Department's determination  
24 that public health and welfare would in no way be adversely affected.

25  
26 (1) Maintain posted notices in place for as long as the violation or  
27 occurrence continues, but in no case less than seven days;



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) Repeat the notice every three months as long as the violation or occurrence continues. Subject to the Department's written approval based on its determination that public health would in no way be adversely affected, the water system may be allowed to notice less frequently but in no case less than once per year. No allowance for reduced frequency of notice shall be given in the case of a total coliform MCL violation or violation of a Chapter 17 treatment technique requirement; and

(3) For turbidity violations pursuant to Sections 64652.5(c)(2) and 64653(c), (d) and (f), as applicable, a water system shall consult with the Department as soon as possible within 24 hours after the water system learns of the violation to determine whether a Tier 1 public notice is required. If consultation does not take place within 24 hours, the water system shall give Tier 1 public notice within 48 hours after learning of the violation.

(c) A water system shall deliver the notice, in a manner designed to reach persons served, within the required time period as follows:

(1) Unless otherwise directed by the Department in writing based on its assessment of the violation or occurrence and the potential for adverse effects on public health and welfare, community water systems shall give public notice by;

(A) Mail or direct delivery 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



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

employers), and other service connections to which water is delivered by the water system; and

(B) Use of 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 water system, or on the Internet; or
3. Delivery to community organizations.

Conditions 22 and 25 of Permit Amendment 1910156PA-003 issued to the City on January 4, 2011 provide:

Condition 22

The City shall maintain at least 1.25 mg/L of free chlorine residuals at the free chlorine sampling point at all times.

Condition 25

If the minimum disinfectant residual of 1.25 mg/L could not be maintained at the free chlorine sampling point for more than 4 hours, the City shall provide Tier 2 public notification within 30 days.



1       **STATEMENT OF FACTS**

2

3       Background

4

5       The City is located in the middle of Los Angeles County, surrounded by the cities of  
6       Los Angeles, West Hollywood, Santa Monica and Culver City. It encompasses an  
7       area of about 5.69 square miles. It is bounded on the north by Sunset Boulevard, on  
8       the south by Whitworth Boulevard, on the west by Whittier Drive and on the east by La  
9       Cienega Boulevard. The City's water system provides water to customers in the City  
10      of Beverly Hills and a portion of the City of West Hollywood. It currently serves an  
11      estimated permanent population of 44,290 people and daytime population of about  
12      200,000 people. The City serves a total of 11,046 active service connections. Out of  
13      the 11,046 connections, 8,908 are residential connections, 2,129 are commercial  
14      connections, 1 industrial connection and 8 are irrigation connections. 160 of these  
15      connections are in the City of West Hollywood.

16

17      The City currently operates the water system under a domestic water supply permit  
18      issued by the Department on April 14, 2003 and three permit amendments issued on  
19      March 15, 2010, November 24, 2010 and January 4, 2011.

20

21      The City has four active groundwater wells, two active connections with the  
22      Metropolitan Water District of Southern California (MWDSC), and two emergency  
23      connections with the Los Angeles Department of Water and Power. The City also has  
24      9 active storage tanks that provide about 42.62 MG of water storage for the 15  
25      pressure zones in the distribution system.

26

27



1 Water produced by the City's four active groundwater wells is treated at the City's RO  
2 Water Treatment Plant, to remove/reduce TDS, hardness, manganese and hydrogen  
3 sulfide. Since June 2008, the City has been implementing interim arsenic blending  
4 treatment to reduce arsenic level in the RO Water Treatment Plant effluent. The City  
5 also provides 4-log virus inactivation treatment, chloramination and fluoridation  
6 treatment to the well water. From the treatment plant, the water travels through  
7 approximately 7,100 feet of 16-inch diameter pipe to the Sunset Reservoir, where  
8 treated surface water purchased from MWDSC is introduced. MWDSC water is  
9 fluoridated.

10  
11 The City's Bacteriological Sample Siting Plan (BSSP) dated June 2004 specifies the  
12 collection of 14 routine samples every Mondays, rotating among 19 approved routine  
13 sample sites. All repeat sample locations for each routine sample site are listed in the  
14 approved BSSP. The City contracts the Truesdail Laboratories, Inc. (Truesdail  
15 Laboratory) for coliform bacteria analyses. The City also measures chlorine residuals  
16 at the same time while collecting the routine bacteriological samples from the  
17 distribution system. Instead of conducting triggered source monitoring whenever a  
18 routine total coliform-positive sample is detected in the distribution system, the City  
19 provides 4-log virus inactivation treatment to its groundwater source to comply with the  
20 Ground Water Rule.

21  
22 **Summary of Events**

23  
24 **Tuesday, November 13, 2012**

25 According to the City's letter dated January 7, 2013 (Attachment 1), the RO Water  
26 Treatment Plant had been removed from service at 15:00 pm.



1 Monday, December 3, 2012

2 Mr. Joseph Renzacci, the City's certified T2 operator collected 14 routine total coliform  
3 samples and conducted total chlorine residual tests at the same time. Total chlorine  
4 residuals in the distribution system ranged from 1.05 mg/L at 410 Walker Drive to 2.04  
5 mg/L at 1022 Woodland Drive. One of the routine samples was collected at 969  
6 Larrabee Drive at 2:33 am. Total chlorine residual at this site was 1.73 mg/L. The  
7 samples were relinquished by Mr. David Hillyer, the City's certified T3 operator, and  
8 received by Mr. Rafael Davila of Truesdail Laboratory at 7:30 am.

9  
10 Mr. Renzacci also collected nitrite samples at all reservoirs in operation and  
11 conducted total chlorine residual tests at the MWD connections (BH-1 and BH-2),  
12 Sunset Reservoir (where MWD water blended with the RO Water Treatment Plant  
13 effluent) and seven other reservoirs (Woodland Reservoir, Coldwater Reservoir,  
14 Reservoir 3A, Greystone Reservoir, Reservoir 4B, Reservoir 5 and Reservoir 6). BH-1  
15 and BH-2 had 2.04 mg/L and 2.01 mg/L of total chlorine residuals, respectively.  
16 Sunset Reservoir had 1.78 mg/L of total chlorine residual. Total chlorine residuals in  
17 the remaining reservoirs ranged from 1.21 mg/L (Reservoir 6) to 2.06 mg/L (Woodland  
18 Reservoir).

19  
20 Tuesday, December 4, 2012

21 Around 9:00 am, Truesdail Laboratory completed the analysis of samples collected by  
22 the City on December 3, 2012. According to the Laboratory Report No. 805091, the  
23 routine sample collected on December 3, 2012 at 969 Larrabee Drive was positive for  
24 total coliform, but negative for *E. coli*. Mr. Hillyer collected the repeat sample at 969  
25 Larrabee Drive at 11:02 am. The upstream and downstream repeat samples were  
26 collected at 11:35 am and 11.18 am at 949 Larrabee Drive and 976 Larrabee Drive,  
27



1 respectively. Total chlorine residuals were 1.49 mg/L, 1.59 mg/L and 1.13 mg/L,  
2 respectively, at 969 Larrabee Drive, 949 Larrabee Drive and 976 Larrabee Drive.  
3

4 The City reported in the monthly report for the RO Water Treatment Plant that  
5 samples had been collected from Well 2, Well 5, and Well 6 for bacteriological  
6 analysis on December 4, 2012. The sample collected from Well 5 was positive for  
7 total coliform, negative for *E. Coli*.  
8

9 Wednesday, December 5, 2012

10 Truesdail Laboratory completed the analysis of the three repeat samples and reported  
11 the results to the City. The Laboratory Report No. 805144 indicated the absence of  
12 total coliform bacteria in the samples collected from the original coliform-positive site  
13 and the upstream and downstream repeat sample sites on December 4, 2012. Total  
14 chlorine residual in these three samples ranged from 1.13 mg/L to 1.59 mg/L.  
15

16 Monday, December 10, 2012

17 Mr. Renzacci collected 14 routine total coliform samples and conducted total chlorine  
18 residual tests at the same time. Chlorine residuals in the distribution system ranged  
19 from 0.79 mg/L at 410 Walker Drive to 2.03 mg/L at 1022 Woodland Drive.  
20

21 Mr. Renzacci also collected nitrite samples at all reservoirs in operation and  
22 conducted total chlorine residual tests at the MWD connections (BH-1 and BH-2),  
23 Sunset Reservoir and seven other reservoirs in operation. BH-1 and BH-2 had 2.1  
24 mg/L and 2.04 mg/L of total chlorine residuals, respectively. Sunset Reservoir had  
25 1.94 mg/L of total chlorine residual. Total chlorine residual in the remaining reservoirs  
26 ranged from 0.99 mg/L (Reservoir 6) to 2.11 mg/L (Woodland Reservoir).  
27



1 Tuesday, December 11, 2012

2 Truesdail Laboratory completed the analysis of the 14 routine samples collected on  
3 December 10, 2012 and reported the results to the City. Laboratory Report No.  
4 805262 indicated the absence of total coliform bacteria in all 14 routine samples.  
5

6 Friday, December 14, 2012

7 According to the City's letter dated January 7, 2013, the RO Water Treatment Plant  
8 had been placed back into service at 11:30 am.  
9

10 Monday, December 17, 2012

11 Mr. Renzacci collected 14 routine total coliform samples and conducted total chlorine  
12 residual tests at the same time. Chlorine residual in the distribution system ranged  
13 from 0.21 mg/L at 465 Martin Lane to 2.08 mg/L at 610 Canon Drive. Bacteriological  
14 samples were also collected from Well 4 and at RO effluent (before blending and 4-  
15 log virus inactivation treatment) as well as RO Water Treatment Plant effluent (after  
16 blending and 4-log virus inactivation treatment).  
17

18 Mr. Renzacci also collected nitrite samples at all reservoirs in operation and  
19 conducted total chlorine residual tests at the MWD connections (BH-1 and BH-2),  
20 Sunset Reservoir and seven other reservoirs in operation. BH-1 and BH-2 had 1.97  
21 mg/L and 1.95 mg/L of total chlorine residuals, respectively. Sunset Reservoir had  
22 1.78 mg/L of total chlorine residual. Because chloramine is less powerful than free  
23 chlorine, a range of 1-2 mg/L, measured as total chlorine at the entry point to the  
24 distribution system and greater than 1 mg/L at the system extremities, are typically  
25 practiced/recommended by the water industry. Two of the operating reservoirs had  
26 lower than 1 mg/L of total chlorine residual (0.25 mg/L in Reservoir 6 and 0.87 mg/L in  
27 Reservoir 4B).



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

Tuesday, December 18, 2012

The City's monthly 4-log virus inactivation compliance report indicated the lowest chlorine residual of the day had been 1.24 mg/L. Condition 22 of the Permit Amendment 1910156 PA-003 directs the City to maintain at least 1.25 mg/L of free chlorine residuals at the free chlorine sampling point at all times. Condition 25 of the same Permit Amendment also directs the City to provide Tier 2 public notification within 30 days if the minimum disinfectant residual of 1.25 mg/L could not be maintained at the free chlorine sampling point for more than 4 hours. The City did not report the duration of this low residual incident.

Truesdail Laboratory completed the analysis of the 14 routine samples collected on December 17, 2012 and reported the results to the City. Laboratory Report No. 805390 indicated the absence of total coliform bacteria in all 14 routine samples.

Wednesday, December 19, 2012

Truesdail Laboratory completed the analysis of the samples collected from Well 4, RO Effluent and RO Water Treatment Plant effluent collected on December 17, 2012 and reported the results to the City. Laboratory Report No. 805389 indicated the absence of total coliform bacteria in RO Water Treatment Plant effluent, but presence of total coliform bacteria in the water collected from Well 4 and RO effluent. The plate count results were 670 cfu/mL, 380 cfu/mL and 14 cfu/mL for the samples collected from Well 4, RO effluent and RO Water Treatment Plant effluent, respectively.

1 Saturday, December 22, 2012

2 According to the City's letter dated January 7, 2013, the RO Water Treatment Plant  
3 had been removed from service at 6:45 am.

4  
5 Monday, December 24, 2012

6 Mr. Renzacci collected 14 routine total coliform samples. Total chlorine residuals  
7 ranged from 0.58 mg/L at 410 Walker Drive to 1.95 mg/L at 124 S. Maple Drive. Five  
8 of the routine samples were collected at 969 Larrabee Drive, 1715 Green Acres Drive,  
9 1112 Tower Road, 410 Walker Drive and 124 S. Maple Drive at 3:07 am, 1:24 am,  
10 1:35 am, 3:42 am and 2:48 am, respectively. These samples were relinquished by Mr.  
11 Renzacci and received by Mr. Davila of Truesdail Laboratory at 8:30 am.

12  
13 Mr. Renzacci also collected nitrite samples at all reservoirs in operation and  
14 conducted total chlorine residual tests at the MWD connections (BH-1 and BH-2),  
15 Sunset Reservoir and seven other reservoirs in operation. BH-1 and BH-2 had 2.1  
16 mg/L and 2.02 mg/L of total chlorine residuals, respectively. Sunset Reservoir had  
17 1.99 mg/L of total chlorine residual. Four of the operating reservoirs had lower than 1  
18 mg/L of total chlorine residuals (0.56 mg/L in Woodland Reservoir, 0.37 mg/L in  
19 Reservoir 4B, 0.64 mg/L in Reservoir 5 and 0.84 mg/L in Reservoir 6).

20  
21 Wednesday, December 26, 2012

22 Around 2:00 pm, Truesdail Laboratory completed the analysis of total coliform  
23 samples collected by the City on December 24, 2012. According to Truesdail  
24 Laboratory Report No. 805489, the routine samples collected at 969 Larrabee Drive,  
25 1715 Green Acres Drive, 1112 Tower Road, 410 Walker Drive and 124 S. Maple Drive  
26 had been tested positive for total coliform, but absence of *E. coli*. Upon notification by  
27 the laboratory, Mr. Hillyer collected the repeat samples between 4:00 pm and 6:10 pm.



1 The repeat sample sites included 969 Larrabee St., 949 Larrabee St., 976 Larrabee  
2 St., 124 S. Maple Drive, 120 S. Maple Drive, 140 S. Maple Drive, 1715 Green Acres  
3 Drive, 1112 Tower Road, 410 Walker Drive, 415 Walker Dive., 1950 Carla Ridge,  
4 1725 Green Acres Drive, 1705 Green Acres Drive, 1100 Tower Road, and 1118  
5 Tower Road. Total chlorine residuals at these sites ranged from 0.49 mg/L at 410  
6 Walker Drive to 2.02 mg/L at 124 S. Maple Drive. Even though 5 out of 14 samples  
7 collected on December 24, 2012 tested positive for total coliform and half of the  
8 reservoirs in service had lower than 1 mg/L of total chlorine residuals on December  
9 24, 2012, the City did not flush the affected areas and did not report this event to the  
10 Department. It is not clear if the City has conducted any investigation to verify the  
11 integrity of its source, treatment works and storage reservoirs and distribution system  
12 or has collected any special samples after receiving the notification of five total  
13 coliform positive routine samples from the laboratory.

14  
15 Thursday, December 27, 2012

16 Around 3:30 pm, Truesdail Laboratory completed the coliform test analysis for the 15  
17 repeat samples collected by the City on December 26, 2012. Truesdail's Laboratory  
18 Report No. 805510 indicated the absence of total coliform bacteria in the 15 repeat  
19 samples.

20  
21 Friday, December 28, 2012

22 According to the City's letter dated January 7, 2013, the RO Water Treatment Plant  
23 had been replaced back into service at 7:30 pm.



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

Saturday, December 29, 2012

The City's monthly 4-log Virus Inactivation Compliance Report indicated the lowest chlorine residual of the day had been 1.15 mg/L. In the report, Mr. Stanley Vielma, the City's acting Water Quality Specialist indicated the low residual episode had lasted for 2 minutes.

Monday, December 31, 2012

Again, the lowest chlorine residual of the day (1.04 mg/L) was below the minimum residual of 1.25 mg/L specified in the permit amendment for the 4-log virus inactivation treatment. In the 4-log Virus Inactivation Compliance Report, Mr. Vielma indicated the low residual episode had lasted for 20 minutes.

Mr. Renzacci collected 14 routine total coliform samples. Total chlorine residuals ranged from 0.78 mg/L at 1114 Wallace Drive to 1.68 mg/L at 124 S. Maple Drive.

Mr. Renzacci also collected nitrite samples at all reservoirs in operation and conducted total chlorine residual tests at the MWD connections (BH-1 and BH-2), Sunset Reservoir and six other reservoirs in operation (Woodland Reservoir was out of service). BH-1 and BH-2 had 2.17 mg/L and 2.07 mg/L of total chlorine residuals, respectively. Sunset Reservoir had 1.53 mg/L of total chlorine residual. Reservoir 4B still had total chlorine residual lower than 1 mg/L (0.76 m/L).



1 Wednesday, January 2, 2013

2 Around 9:15 am, Truesdail Laboratory completed the coliform test analysis for the 14  
3 samples collected by the City on December 31, 2012. Truesdail's Laboratory Report  
4 No. 805516 indicated the absence of total coliform bacteria in all 14 routine samples.  
5

6 Monday, January 7, 2013

7 Mr. Vielma submitted to the Department via e-mail the December 2012 Compliance  
8 Reports Package. The package included the Quarterly Report for Disinfectant  
9 Residuals, Monthly Summary of Distribution System Coliform Monitoring, Monthly  
10 Summary of Monitoring for Surface Water Treatment Regulations (SWTR), Truesdail's  
11 reports for distribution system general physical analysis and distribution reservoir  
12 nitrite monitoring, weekly routine distribution bacteriological analysis and repeat  
13 bacteriological sample analysis sheet for the repeat samples collected on December  
14 26, 2012, and Reverse Osmosis Water Treatment Plant Operations and Monitoring  
15 Report, including 4-log Virus Inactivation Report and Fluoridation Report.  
16

17 Mr. Vielma reported in the Monthly Summary of Distribution System Coliform  
18 Monitoring (Attachment 2) that the City had collected a total of 122 samples, including  
19 104 routine samples and 18 repeat samples in December 2012. Out of the 122  
20 samples, 6 of them were tested positive for total coliform bacteria (4.91 percent). Mr.  
21 Vielma indicated the City was in compliance with both the total coliform MCL and *E.*  
22 *Coli* MCL in December 2012.  
23

24 In a cover letter dated January 7, 2013 (Attachment 3), Mr. Vielma stated "We had 6  
25 positive Bac-T samples during our weekly distribution collection. All were collected on  
26 the same day during a windy and rainy night." In reality, positive total coliform  
27 samples were collected in two different days.



1 Wednesday, January 9, 2013

2 The Department received the hard copies of the reports e-mailed to the Department  
3 on January 7, 2012.

4  
5 Wednesday, January 16, 2013

6 After completing the review of the documents submitted by the City on January 7 and  
7 9, 2012, Ms. Naira Ghukasyan, an Environmental Scientist with the Department sent  
8 an e-mail to Mr. Vielma and requested clarification and submittal of missing reports  
9 (Attachment 4). Among the issues were the following:

- 10 • Mr. Vielma reported 104 routine samples had been collected in December  
11 2012. However, the laboratory reports showed that only 70 routine samples  
12 had been analyzed in December 2012. In the Summary of Monitoring for  
13 SWTR and Disinfectant Residuals Compliance Report, Mr. Vielma also  
14 indicated 104 samples had been collected (Attachment 5).
- 15 • Mr. Vielma reported there had been 18 repeat samples collected in December  
16 2012. However, Mr. Vielma only reported the monitoring results for 15 repeat  
17 samples in the Monthly Summary of Distribution System Coliform Monitoring.  
18 Mr. Vielma also did not provide the laboratory report for the repeat samples  
19 collected on December 4, 2012 to the Department.
- 20 • Mr. Vielma did not submit the laboratory reports for the bacteriological samples  
21 collected at the City's four groundwater wells.
- 22 • The Stage 2 Disinfection By-Product Rule Summary Report was missing in the  
23 package.

24  
25 Tuesday, January 22, 2013

26 The Department did not receive a response from Mr. Vielma to the e-mail sent by Ms.  
27 Ghukasyan on January 16, 2012. Around 9:04 am, Ms. Ofelia Oracion, a Sanitary



1 Engineer with the Department, sent an e-mail to Mr. Vielma to follow-up. Mr. Vielma  
2 sent an e-mail response at 9:14 am, indicating he was finishing up and getting the  
3 documents ready for re-submission (Attachment 6).

4  
5 Thursday, January 24, 2013

6 Mr. Vielma submitted via e-mail the revised Monthly Summary of Distribution System  
7 Coliform Monitoring and Monthly Summary of Monitoring for SWTR (Attachment 7).  
8 Except for the updated Disinfectant Residuals Compliance Report, all other  
9 documents requested were included in the submittal.

10  
11 According to the revised Monthly Summary of Distribution System Coliform Monitoring,  
12 the City had collected a total of 71 routine bacteriological samples, instead of 104  
13 samples as had been reported originally. Out of the 71 routine samples, 6 were  
14 coliform positive. A total of 18 repeat samples were collected. Mr. Vielma reported  
15 the percent of samples that were total coliform positive in December 2012 had been  
16 6.70 percent and the City had violated the total coliform MCL. This report showed that  
17 the City had realized the December 2012 total coliform MCL violation on January 24,  
18 2013 or earlier. Mr. Vielma did not call the Department personnel or highlighted in his  
19 e-mail of the December 2012 Total Coliform MCL exceedance.

20  
21 Tuesday, January 29, 2013

22 Ms. Ghukasyan completed the review of the documents submitted on January 24,  
23 2013 by the City. The laboratory reports submitted by Mr. Vielma showed that 14  
24 routine samples per week had been collected during the weeks of December 3,  
25 December 10, December 17, December 24 and December 31, 2013. Therefore, the  
26 total number of routine samples collected by the City should have been 70, and not  
27 71. Additionally, Mr. Vielma still did not include all 18 repeat samples collected in



1 December 2012 in the Monthly Summary of Distribution System Coliform Monitoring.  
2 Mr. Vielma did not update the Monthly SWTR Summary Form and did not resubmit  
3 the Disinfection Residuals Compliance Form. Ms. Ghukasyan sent a follow-up e-mail  
4 to Mr. Vielma (Attachment 8).

5  
6 Wednesday, February 6, 2013

7 Mr. Vielma responded to Ms. Ghukasyan's e-mail of January 29, 2013. He insisted  
8 that the number of routine samples collected in December 2012 had been 71  
9 (Attachment 9) and the total number of bacteriological samples collected in December  
10 2012, including the 18 repeat samples, had been 89. The Disinfection Residuals  
11 Compliance Form resubmitted by Mr. Vielma indicated chlorine residuals had been  
12 measured at 89 routine and repeat sample sites.

13  
14 Wednesday, March 6, 2013

15 Ms. Oracion was not aware that the City had violated the total coliform MCL until she  
16 reviewed the City's December 2012 Compliance Reports, including all documents  
17 submitted by the City from January 7, 2013 through February 6, 2013. She  
18 immediately brought this issue to the attention of Ms. Shu-Fang Orr, the District  
19 Engineer of Angeles District.

20  
21 Ms. Orr called Mr. Kevin Watson, the City's Water Production Manager right away and  
22 left a message. Mr. Watson called back around 4:02 pm. Ms. Orr inquired Mr.  
23 Watson if he was aware of the total coliform MCL violation in December 2012. Mr.  
24 Watson indicated he thought the positive samples were invalidated when all repeat  
25 samples had come back negative for total coliform. Mr. Watson also stated the City  
26 had indicated in the monthly summary that the positive samples had been collected on  
27 a windy and rainy day. Ms. Orr told Mr. Watson sampling error was not a reason for



1 invalidation, and the invalidation must be approved by the Department, not the water  
2 system.

3  
4 Ms. Orr asked Mr. Watson if the City had conducted any follow up investigation. Mr.  
5 Watson indicated the City had done so. Ms. Orr then requested Mr. Watson to  
6 provide a written investigation report. Ms. Orr also advised the City to conduct the Tier  
7 2 public notification as soon as possible, since the 30 days deadline had passed  
8 (February 24, 2013, assuming the City had made the determination on January 24,  
9 2013, not earlier). Mr. Watson agreed to work on the Tier 2 public notification right  
10 away.

11  
12 Thursday, March 7, 2013

13 Mr. Vielma finally agreed that the total number of routine samples collected in  
14 December 2012 had been 88, consisting of 70 routine sample sites and 18 repeat  
15 sample sites. He corrected the Monthly Summary of Distribution System Coliform  
16 Monitoring to reflect this figure (Attachment 10). Mr. Watson submitted the first draft  
17 public notice to the Department. Mr. Watson also informed the Department that the  
18 City would conduct a press release, in addition to mail the notice to the customers and  
19 post the notice on the City's website. Mr. Watson agreed to notify the Department  
20 before the press release went out.

21  
22 Mr. Watson indicated in the public notice that the positive total coliform results had  
23 most likely been caused by sample contamination due to the bad weather conditions  
24 during sampling. The Department approved the first draft notice after Mr. Watson had  
25 incorporated the Department's comments. Ms. Orr informed Mr. Watson that the  
26 Department had not made the final determination regarding the cause of the  
27



1 December 2012 total coliform MCL violation. The Department would draw the final  
2 conclusion after receiving the City's investigation report.  
3

4 Friday, March 8, 2013

5 Mr. Watson called Ms. Orr and requested for a 60-day extension to complete the Tier  
6 2 public notification. Ms. Orr informed Mr. Watson that the City had already failed the  
7 30-day deadline to conduct the Tier 2 public notification and no extension could be  
8 granted after the deadline. Although the Department had approved the public notice  
9 language, Mr. Watson modified the language again and submitted two more versions  
10 of the public notice for review.  
11

12 The City conducted a press release regarding the December 2012 total coliform MCL  
13 violation. A copy of the press release is attached (Attachment 11).  
14

15 Monday, March 11, 2013

16 Mr. Watson submitted the latest version of the public notice and requested for  
17 approval. Mr. Watson indicated the City would post these documents on-line on the  
18 same day and mail these documents out on March 13, 2013. Since Mr. Watson did  
19 not mention when the City would conduct the press release, Ms. Oracion called Mr.  
20 Watson. Mr. Watson told Ms. Oracion over the phone that the press release would be  
21 conducted soon. After that conversation, Mr. Watson sent an e-mail to inform the  
22 Department the City had conducted the press release on March 8, 2013.  
23  
24  
25  
26  
27



1 Tuesday, March 12, 2013

2 The City had yet to provide a written investigation report to the Department. Ms. Orr  
3 completed the review of all the documents submitted by the City and realized that  
4 there were issues with the treatment work and the City had trouble in maintaining  
5 stable and adequate level of total chlorine residual in the distribution systems. The  
6 summaries of the results for all bacteriological quality samples and nitrite samples  
7 collected in December 2012 and chlorine residual measurement results are attached  
8 (Attachment 12). Ms. Orr contacted Mr. Chris Theisen, P.E., the Assistant Director of  
9 the City's Public Works & Transportation and requested for a meeting.

10  
11 **DETERMINATIONS**

12  
13 The Department has determined that the City is in violation of Section 64423.1(c)(3),  
14 Section 64426, Section 64426.1 and Section 64463.4 of Title 22, California Code of  
15 Regulations due to: 1) The City did not require the laboratory to submit copies of  
16 bacteriological monitoring results for all positive routine samples and all repeat  
17 samples directly to the Department. The City did not provide the Department with all  
18 the laboratory reports for positive routine and repeat samples in December 2012 until  
19 January 24, 2013; 2) The City did not provided the Department with information on the  
20 status of physical works and operating procedures which may have caused the  
21 elevated bacteriological findings, or any information on community illness suspected of  
22 being waterborne on December 26, 2012, when the City should have realized that the  
23 total number of positive samples would have caused the City to be out of compliance  
24 with the total coliform MCL. Thus, the Department had no opportunity to determine if  
25 a water quality emergency notification is necessary to protect public health. Up to  
26 date, the City still has not provided an investigation report to the Department; 3) More  
27 than 5 percent of samples collected in December 2012 were positive for total coliform.



1 The City failed to comply with the total coliform MCL in December 2012; and 4) The  
2 City realized it had violated the total coliform MCL on January 24, 2013 or earlier.  
3 However, the City did not conduct the Tier 2 public notice within the 30-day time  
4 frame.

5  
6 **DIRECTIVES**

7  
8 The City of Beverly Hills is hereby directed to take the following actions:

- 9  
10 1. The City shall conduct a detailed investigation of the cause of the total coliform  
11 MCL violation in December 2012 and submit the investigation report to the  
12 Department by **March 29, 2013**. The report shall be prepared in accordance with  
13 the requirements of Section 64426 (b) (2), Title 22, California Code of Regulations.  
14 The report shall also document any corrective actions taken to minimize future total  
15 coliform MCL failure.
- 16  
17 2. The City shall immediately instruct its contracted laboratory to submit copies of  
18 bacteriological monitoring results for all positive routine total coliform samples and  
19 all repeat samples directly to the Department. By **March 29, 2013**, the City shall  
20 submit documentation to the Department, demonstrating such an instruction has  
21 been given to the laboratory.
- 22  
23 3. The City's management staff shall review all the monthly compliance reports  
24 prepared by the Water Quality Specialist, to ensure the information contained in  
25 these reports is complete and accurate. Starting April 1, 2013, all the monthly  
26 compliance reports submitted to the Department shall bear the signatures of the  
27 management staff and a certified operator.



1 4. The City's staff responsible for overseeing the compliance with Title 22 monitoring  
2 and reporting requirements and staff responsible for collecting the samples shall  
3 be fully trained to carry out their duties. By **July 31, 2013**, the City shall submit a  
4 letter listing the names of the trainees, contents of the training sections (courses),  
5 and dates and locations of these training sections provided. If in-house training is  
6 used, information regarding the experiences and qualifications of the instructors  
7 shall also be provided. The training courses must be related to water quality  
8 monitoring, reporting and notification regulations.

9  
10 5. By **March 29, 2013**, the City shall submit a copy of the on-line chlorine residual  
11 analyzer measurement records for December 18, 29 and 31, 2012 and for all the  
12 days with the lowest chlorine residual below 1.25 mg/L in January and February  
13 2013.

14  
15 6. By **March 15, 2013**, the City shall complete the notification of persons served by  
16 the City of the December 2012 total coliform MCL violation. A copy of the  
17 notification shall be submitted to the Department within 10 days of issuance, along  
18 with the enclosed proof of notification form (Attachment 13).

19  
20 The Department reserves the right to make modifications to this Citation, as it may  
21 deem necessary to protect public health and safety. Such modifications may be  
22 issued as amendments to this Citation and shall be effective upon issuance.

23  
24 Nothing in this Citation relieves the City of Beverly Hills of its obligation to meet the  
25 requirements of H&S Code, Division 104, Part 12, Chapter 4 (California Safe Drinking  
26 Water Act), or any regulation, permit, standard or order issued or adopted thereunder.

27



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

3  
4  
5  
6  
7  
8  
9

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

10 **PARTIES BOUND**

11

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

14

15 **SEVERABILITY**

16

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

20

21 **FURTHER ENFORCEMENT ACTION**

22

23 Division 104, Part 12, Chapter 4, (commencing with Section 116270) of the H&S Code  
24 authorizes the Department to issue additional citations with assessment of penalties if  
25 a public water system continues to fail to correct a violation identified in a citation; take  
26 action to suspend or revoke a permit that has been issued to a public water system if  
27 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.

March 14, 2013

Date

Shu-Fang Orr

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



BY CERTIFIED MAIL NO. 7008 3230 0001 6331 1884

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

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

## Attachments (13):

1. The City's Letter dated January 7, 2013 re. RO Water Treatment Plant Fluoridation Treatment
2. December 2012 Monthly Summary of Distribution System Coliform Monitoring dated January 7, 2013
3. The City's Letter dated January 7, 2013 re. December 2012 Distribution System Bacteriological Monitoring
4. January 16, 2013 E-Mail to the City
5. December 2012 Summary of Monitoring for SWTR and Disinfectant Residuals Compliance Report dated January 7, 2013
6. E-mail from the City dated January 22, 2013
7. Revised Monthly Summary of Distribution System Coliform Monitoring and Monthly Summary of Monitoring for SWTR dated January 24, 2013
8. January 29, 2013 E-Mail to the City
9. E-Mail from the City dated February 6, 2013
10. Revised Monthly Summary of Distribution System Coliform Monitoring dated March 7, 2013
11. Press Release by the City dated March 8, 2013
12. The Summaries of the Results for all Bacteriological Quality Samples and Nitrite Samples Collected in December 2012 and Chlorine Residual Measurement Results
13. Proof of Public Notification Form



**The City's Letter dated January 7, 2013 re. RO Water Treatment Plant  
Fluoridation Treatment**

Stan Vielma, Water System Worker III

Public Works & Transportation

January 7, 2013

State of California

Department of Public Health

Southern California Branch

Drinking Water Field Operations

500 N. Central Ave. Suite 500

Glendale, CA 91203

Attn: Ofelia Oracion and Naira Ghukasyan:

Received

JAN - 9 2013

CDPH-DWFOB-Los Angeles

Dear Ms. Ofelia Oracion and Ms. Naira Ghukasyan:

Enclosed is the December 2012 monthly fluoridation report. The RO-Plant did not fluoridate from November 13<sup>th</sup> 2012 at 1500 through December 14<sup>th</sup> at 1130. The WTP was shut down again on December 22<sup>nd</sup> at 0645 due to a planned shutdown for maintenance and restarted December 28<sup>th</sup> at 1430.

If you have any further questions or require further information, please feel free to contact me at 310-285-2498 or my email [svielma@beverlyhills.org](mailto:svielma@beverlyhills.org).

Affirmation:

All analyses were conducted at a laboratory certified for such analyses by the department of Health Services or approved by the Executive Officer and in accordance with current EPA guideline procedures or as specified in this monitoring program.

Ms. Ofelia Oracion &  
Ms. Naira Ghukasyan

Declaration:

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted.

Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of a fine and imprisonment for knowing violations.

Executed on the 7<sup>th</sup> day of January 2013 at The City of Beverly Hills, California.

Sincerely,

A handwritten signature in black ink, appearing to read 'Stan Vielma', with a large, stylized flourish at the end.

Stan Vielma

Water System Worker III

**December 2012 Monthly Summary of Distribution System Coliform  
Monitoring dated January 7, 2013**

**MONTHLY SUMMARY OF DISTRIBUTION SYSTEM  
COLIFORM MONITORING**

System Name <b>City of Beverly Hills</b>	System Number <b>1910156</b>
Sampling Period <b>December</b>	Year <b>2012</b>

	Number Required	Number Collected	Number Total Coliform Positives	Number Fecal/ E.coli Positives
1. Routine Samples (see note 1)	<del>48</del>	<u>104</u>	<u>6</u>	<u>0</u>
2. Repeat Samples Following Samples Which are Total Coliform Positive and Fecal/E.coli <i>Negative</i> (see notes 5 and 6)	60	<u>18</u>	<u>0</u>	<span style="border: 1px solid black; padding: 2px;">0</span>
3. Repeat Samples Following Routine Samples Which are Total Coliform <i>Positive</i> and Fecal/E.coli Positive (see notes 5 and 6)		<u>0</u>	<span style="border: 1px solid black; padding: 2px;">0</span>	<span style="border: 1px solid black; padding: 2px;">0</span>
4. MCL Computation For Total Coliform Positive Samples				
a. Totals (sum of columns)	<del>48</del>	<u>122</u>	<u>0</u>	
b. If 40 or more samples collected in month, determine percent of samples that are total coliform positive [(total number positive/total number collected) x 100]		60		
c. Is system in compliance. ...with fecal/E. coli MCL? (see notes 2 and 3)		<u>4.91%</u>		
...with monthly MCL? (see note 4)		<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	

Received

JAN - 9 2013

COPY TO: [unclear]

5. Invalidated Samples

(Note what samples, if any, were invalidated; who authorized the invalidation; and when replacement samples were collected. Attach additional sheets, if necessary.)

6. Summary Completed By:

Signature 	Water System Worker III	Date <b>01/07/13</b>
---------------	-------------------------	-------------------------

NOTES AND INSTRUCTIONS:

1. Routine samples include:
    - a. Samples required pursuant to 22 CCR Section 64423, and any additional samples required by an approved routine sample siting plan established pursuant to 22 CCR Section 64422.
    - b. Extra samples required for systems collecting less than five routine samples per month that had one or more total coliform positives in previous month;
    - c. Extra samples for systems with high source water turbidities that are using surface water or groundwater under direct influence of surface water and do not practice filtration in compliance with regulations;
  2. Note: For a repeat sample following a total coliform positive sample, any fecal/E.coli positive repeat (boxed entry) constitutes an MCL violation and requires immediate notification to the department (22, CCR, Section 64426.1).
  3. Note: For repeat sample following a fecal/E.coli positive sample, any total coliform positive repeat (boxed entry) constitutes an MCL violation and requires immediate notification to the department (22, CCR, Section 64426.1).
  4. Total coliform MCL (Notify Department within 24 hours of MCL violation):
    - a. For systems collecting less than 40 samples, if two or more samples are total coliform positive, then the MCL is violated.
    - b. For systems collecting 40 or more samples, if more than 5.0 percent of samples collected are total coliform positive, then the MCL is violated.
  5. Positive results and their associated repeat samples must be tracked on the worksheet on the other side.
  6. For systems collecting more than one routine sample per month, three repeat samples must be collected for each total coliform positive sample. Repeat samples must be collected within 24 hours of being notified of the positive results.
  7. For systems collecting one or less routine samples per month, four repeat samples must be collected for each total coliform positive sample.
- DHS 8477 (10/2004)



**The City's Letter dated January 7, 2013 re. December 2012 Distribution  
System Bacteriological Monitoring**

Stan Vielma, Water System Worker III  
Public Works & Transportation

January 7, 2013

State of California  
Department of Public Health  
Southern California Branch  
Drinking Water Field Operations  
500 N. Central Ave. Suite 500  
Glendale, CA 91203  
Attn: Ofelia Oracion and Naira Ghukasyan:

Received

JAN - 9 2013

CDPH-DWFOB-Los Angeles

Dear Ms. Ofelia Oracion and Naira Ghukasyan:

Enclosed is the City of Beverly Hills' Distribution Monthly Report for December 2012. Enclosed are the laboratory results as well. We had 6 positive Bac-T samples during our weekly distribution collection. All were collected on the same day during a windy and rainy night. We resampled at the original location as well as upstream and downstream. All 18 Bac-T resamples came back absent.

If you have any questions or require further information, please feel free to contact me at 310 285-2498 or email me at [svielma@beverlyhills.org](mailto:svielma@beverlyhills.org).

**Affirmation:**

All analyses were conducted at a laboratory certified for such analyses by the department of Health Services or approved by the Executive Officer and in accordance with current EPA guideline procedures or as specified in this monitoring program.

**Declaration:**

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted.

Ms. Ofelia Oracion and  
Ms. Naira Ghukasyan  
Page 2

Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of a fine and imprisonment for knowing violations.

Executed on the 7th day of January, 2013 at The City of Beverly Hills, California.

Sincerely,

A handwritten signature in black ink, appearing to read 'Stan Vielma', written over a horizontal line.

Stan Vielma  
Water System Worker III

**January 16, 2013 E-Mail to the City**

**Ghukasyan, Naira (CDPH-PS-DDWEM)**

---

**From:** Ghukasyan, Naira (CDPH-PS-DDWEM)  
**Sent:** Wednesday, January 16, 2013 1:00 PM  
**To:** 'Stanley Vielma II'; Oracion, Ofelia (CDPH-DDWEM)  
**Cc:** Gehovanny Herrera; Kevin Watson  
**Subject:** RE: December 2012 Monthly Reports for Beverly Hills - CDPH

**Importance:** High

Hi Stanley,

There are a few issues that I noticed while reviewing water quality report for December submitted by Beverly Hills. I'd like to have a chance to discuss them with you:

- Did you collect repeat samples after TC + at 969 Larrabee St on 12/03/12? If yes, please send us copy of the Lab reports;
- How many routine samples were collected during December? There were 5 Mondays in December, so the total is  $14 \times 5 = 70$  not 104, isn't it?  
Then number of repeat samples supposed to be 18, but lab results show only 15?
- Please verify all numbers and revise accordingly the *TCR summary form (both pages)*, *SWTR summary form* and *Disinfectant Residuals Compliance form*;
- The lab reports for all four Wells were not included in the monthly RO WTP reports package;
- The 4<sup>th</sup> q. DBPR report also was not included.

Would you, please follow up on these issues and submit missing/revised reports ASAP?  
Thank you.

***Naira Ghukasyan***

Environmental Scientist  
California Department of Public Health  
500 North Central Avenue, Suite 500  
Glendale, CA 91203  
Phone: (818) 551-2021/Fax: (818) 551-2054  
Email: [Naira.Ghukasyan@cdph.ca.gov](mailto:Naira.Ghukasyan@cdph.ca.gov)



---

**From:** Stanley Vielma II [<mailto:svielma@beverlyhills.org>]  
**Sent:** Monday, January 07, 2013 1:27 PM  
**To:** Ghukasyan, Naira (CDPH-PS-DDWEM); Oracion, Ofelia (CDPH-DDWEM)

**Cc:** Gehovanny Herrera; Kevin Watson

**Subject:** December 2012 Monthly Reports for Beverly Hills - CDPH

If you have any questions, please don't hesitate to call. Thank you.

Stan Vielma  
Water Worker III  
City of Beverly Hills  
O: (310) 285-2498  
F: (310) 288-2857  
[svielma@beverlyhills.org](mailto:svielma@beverlyhills.org)

**December 2012 Summary of Monitoring for SWTR and Disinfectant  
Residuals Compliance Report dated January 7, 2013**



### Quarterly Report for Disinfectant Residuals Compliance For Systems Using Chlorine or Chloramines

System Name: City of Beverly Hills

System No.: 1910156

Calendar Year: 2012

Quarter: 4th

1st Quarter			
Month	Number of Samples Taken	Monthly Ave. Chlorine Level (mg/L)	
Previous Year	April	1.60	
	May	1.50	
	June	1.35	
	July	1.57	
	August	1.59	
	September	1.59	
	October	1.62	
	November	1.48	
	December	1.62	
	Current Year	January	70
		February	56
		March	56
Running Annual Average (RAA):		1.61	
Meets standard? (i.e. RAA ≤ MRDL of 4.0 mg/L as Cl <sub>2</sub> )		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

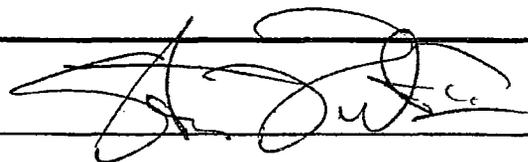
2nd Quarter			
Month	Number of Samples Taken	Monthly Ave. Chlorine Level (mg/L)	
Previous Year	July	1.57	
	August	1.59	
	September	1.59	
	October	1.62	
	November	1.48	
	December	1.62	
	Current Year	January	1.79
		February	1.81
		March	1.79
		April	70
		May	56
		June	59
Running Annual Average (RAA):		1.71	
Meets standard? (i.e. RAA ≤ MRDL of 4.0 mg/L as Cl <sub>2</sub> )		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

3rd Quarter		
Month	Number of Samples Taken	Monthly Ave. Chlorine Level (mg/L)
Previous Yr	October	1.62
	November	1.48
	December	1.62
Current Year	January	1.79
	February	1.81
	March	1.79
	April	1.89
	May	1.90
	June	1.83
	July	70
	August	56
	September	56
Running Annual Average (RAA):		1.76
Meets standard? (i.e. RAA ≤ MRDL of 4.0 mg/L as Cl <sub>2</sub> )		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

4th Quarter		
Month	Number of Samples Taken	Monthly Ave. Chlorine Level (mg/L)
Current Year	January	1.79
	February	1.81
	March	1.79
	April	1.89
	May	1.90
	June	1.83
	July	1.84
	August	1.81
	September	1.79
	October	70
	November	80
	December	104
Running Annual Average (RAA):		1.76
Meets standard? (i.e. RAA ≤ MRDL of 4.0 mg/L as Cl <sub>2</sub> )		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

Comments:

Signature: \_\_\_\_\_



Date: 1/7/2013

**E-mail from the City dated January 22, 2013**

Ghukasyan, Naira (CDPH-PS-DDWEM)

---

**From:** Oracion, Ofelia (CDPH-DDWEM)  
**Sent:** Tuesday, January 22, 2013 11:37 AM  
**To:** Stanley Vielma II  
**Cc:** Gehovanny Herrera; Ghukasyan, Naira (CDPH-PS-DDWEM)  
**Subject:** RE: December 2012 Monthly Reports for Beverly Hills - CDPH

Thanks! Please do not hesitate to call us if you need any assistance.

---

**From:** Stanley Vielma II [mailto:svielma@beverlyhills.org]  
**Sent:** Tuesday, January 22, 2013 9:14 AM  
**To:** Oracion, Ofelia (CDPH-DDWEM)  
**Cc:** Gehovanny Herrera  
**Subject:** RE: December 2012 Monthly Reports for Beverly Hills - CDPH

Hello. Sorry for the delay. I am finishing up on getting the documentation to resubmit. We were out for training and I was and still under the weather since last week.

---

**From:** Oracion, Ofelia (CDPH-DDWEM) [mailto:Ofelia.Oracion@cdph.ca.gov]  
**Sent:** Tuesday, January 22, 2013 9:04 AM  
**To:** Stanley Vielma II  
**Cc:** Kevin Watson; Gehovanny Herrera; Ghukasyan, Naira (CDPH-PS-DDWEM)  
**Subject:** FW: December 2012 Monthly Reports for Beverly Hills - CDPH  
**Importance:** High

This is a follow-up to the email sent to you on January 16, 2013. Please respond as soon as possible.

Thanks,

Ofelia A. Oracion, Sanitary Engineer  
Drinking Water Program  
California Department of Public Health  
500 North Central Avenue, Suite 500  
Glendale, CA 91203  
Tel (818) 551-2020  
Fax (818) 551-2054  
email: [Ofelia.Oracion@cdph.ca.gov](mailto:Ofelia.Oracion@cdph.ca.gov)

---

**From:** Ghukasyan, Naira (CDPH-PS-DDWEM)  
**Sent:** Wednesday, January 16, 2013 1:00 PM  
**To:** Stanley Vielma II; Oracion, Ofelia (CDPH-DDWEM)  
**Cc:** Gehovanny Herrera; Kevin Watson  
**Subject:** RE: December 2012 Monthly Reports for Beverly Hills - CDPH  
**Importance:** High

Hi Stanley,

There are a few issues that I noticed while reviewing water quality report for December submitted by Beverly Hills. I'd like to have a chance to discuss them with you:

• Did you collect repeat samples after TC + at 969 Larrabee St on 12/03/12? If yes, please send us copy of the Lab reports;

• How many routine samples were collected during December? There were 5 Mondays in December, so the total is  $14 \times 5 = 70$  not 104, isn't it?

Then number of repeat samples supposed to be 18, but lab results show only 15?

• Please verify all numbers and revise accordingly the *TCR summary form (both pages)*, *SWTR summary form* and *Disinfectant Residuals Compliance form*;

• The lab reports for all four Wells were not included in the monthly RO WTP reports package;

• The 4<sup>th</sup> q. DBPR report also was not included.

Would you, please follow up on these issues and submit missing/revised reports ASAP?

Thank you.

*Naira Ghukasyan*

Environmental Scientist

California Department of Public Health

500 North Central Avenue, Suite 500

Glendale, CA 91203

Phone: (818) 551-2021/ Fax: (818) 551-2054

Email: [Naira.Ghukasyan@cdph.ca.gov](mailto:Naira.Ghukasyan@cdph.ca.gov)



---

**From:** Stanley Vielma II [<mailto:svielma@beverlyhills.org>]

**Sent:** Monday, January 07, 2013 1:27 PM

**To:** Ghukasyan, Naira (CDPH-PS-DDWEM); Oracion, Ofelia (CDPH-DDWEM)

**Cc:** Gehovanny Herrera; Kevin Watson

**Subject:** December 2012 Monthly Reports for Beverly Hills - CDPH

If you have any questions, please don't hesitate to call. Thank you.

Stan Vielma

Water Worker III

City of Beverly Hills

O: (310) 285-2498

F: (310) 288-2857

[svielma@beverlyhills.org](mailto:svielma@beverlyhills.org)

**Revised Monthly Summary of Distribution System Coliform Monitoring and  
Monthly Summary of Monitoring for SWTR dated January 24, 2013**

**MONTHLY SUMMARY OF DISTRIBUTION SYSTEM  
COLIFORM MONITORING**

System Name <b>City of Beverly Hills</b>	System Number <b>1910156</b>
Sampling Period <b>December</b>	Year <b>2012</b>

	Number Required	Number Collected	Number Total Coliform Positives	Number Fecal/ E.coli Positives
1. Routine Samples (see note 1)	<u>48</u>	<u>71</u>	<u>6</u>	<u>0</u>
2. Repeat Samples Following Samples Which are Total Coliform Positive and Fecal/E.coli <i>Negative</i> (see notes 5 and 6)		<u>18</u>	<u>0</u>	<u>0</u>
3. Repeat Samples Following Routine Samples Which are Total Coliform <i>Positive</i> and Fecal/E.coli Positive (see notes 5 and 6)		<u>0</u>	<u>0</u>	<u>0</u>
4. MCL Computation For Total Coliform Positive Samples				
a. Totals (sum of columns)	<u>48</u>	<u>89</u>	<u>6</u>	
b. If 40 or more samples collected in month, determine percent of samples that are total coliform positive [(total number positive/total number collected) x 100]		<u>6.70%</u>		
c. Is system in compliance, ...with fecal/E. coli MCL? (see notes 2 and 3)	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No		
...with monthly MCL? (see note 4)	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No		

*Revised*

5. Invalidated Samples  
(Note what samples, if any, were invalidated; who authorized the invalidation; and when replacement samples were collected. Attach additional sheets, if necessary.)

6. Summary Completed By:

Signature 	Water System Worker III	Date <b>01/24/13</b>
---------------	-------------------------	-------------------------

- NOTES AND INSTRUCTIONS:**
1. Routine samples include:
    - a. Samples required pursuant to 22 CCR Section 64423, and any additional samples required by an approved routine sample siting plan established pursuant to 22 CCR Section 64422.
    - b. Extra samples required for systems collecting less than five routine samples per month that had one or more total coliform positives in previous month;
    - c. Extra samples for systems with high source water turbidities that are using surface water or groundwater under direct influence of surface water and do not practice filtration in compliance with regulations;
  2. Note: For a repeat sample following a total coliform positive sample, any fecal/E.coli positive repeat (boxed entry) constitutes an MCL violation and requires immediate notification to the department (22, CCR, Section 64426.1).
  3. Note: For repeat sample following a fecal/E.coli positive sample, any total coliform positive repeat (boxed entry) constitutes an MCL violation and requires immediate notification to the department (22, CCR, Section 64426.1).
  4. Total coliform MCL (Notify Department within 24 hours of MCL violation):
    - a. For systems collecting less than 40 samples, if two or more samples are total coliform positive, then the MCL is violated.
    - b. For systems collecting 40 or more samples, if more than 5.0 percent of samples collected are total coliform positive, then the MCL is violated.
  5. Positive results and their associated repeat samples must be tracked on the worksheet on the other side.
  6. For systems collecting more than one routine sample per month, three repeat samples must be collected for each total coliform positive sample. Repeat samples must be collected within 24 hours of being notified of the positive results.
  7. For systems collecting one or less routine samples per month, four repeat samples must be collected for each total coliform positive sample.
- DHS 8477 (10/2004)





**January 29, 2013 E-Mail to the City**

Ghukasyan, Naira (CDPH-PS-DDWEM)

---

**From:** Ghukasyan, Naira (CDPH-PS-DDWEM)  
**Sent:** Tuesday, January 29, 2013 9:37 AM  
**To:** 'Stanley Vielma II'  
**Cc:** Gehovanny Herrera; Kevin Watson  
**Subject:** RE: December 2012 Monthly Reports for Beverly Hills - CDPH

**Importance:** High

Hi Stanley,  
Please, see my comments in red in the email below.  
Thanks,

*Naira Ghukasyan*

Environmental Scientist  
California Department of Public Health  
500 North Central Avenue, Suite 500  
Glendale, CA 91203  
Phone: (818) 551-2021/ Fax: (818) 551-2054  
Email: [Naira.Ghukasyan@cdph.ca.gov](mailto:Naira.Ghukasyan@cdph.ca.gov)

---

**From:** Stanley Vielma II [mailto:[svielma@beverlyhills.org](mailto:svielma@beverlyhills.org)]  
**Sent:** Thursday, January 24, 2013 3:35 PM  
**To:** Ghukasyan, Naira (CDPH-PS-DDWEM); Oracion, Ofelia (CDPH-DDWEM)  
**Cc:** Gehovanny Herrera; Kevin Watson  
**Subject:** RE: December 2012 Monthly Reports for Beverly Hills - CDPH

Thank you for your patience in this matter. I have included the requested information.

1. Yes, we collected repeat samples after the TC+ at 969 Larrabee 12/03/12. They were collected 12/04/12 all 3 came back absent. The copy of the report is being included with this letter.
2. I did a recount on the routine samples for December 2012 and got 71, not 104 as originally reported.

According to lab reports 14 routine samples were collected on 12/03, 12/10, 12/17, 12/24 and 12/31/12. So, the total number of routine samples should be  $14 \times 5 = 70$ , not 71.

3. The number of repeat samples is correct at 18, the 12/04/12 resample report was not included with the original submission of my report.
4. The TCR summary form (both pages), SWTR summary form and Disinfectant Residuals Compliance form have been updated.

2<sup>nd</sup> page of the TCR summary form supposed to have all (18) repeat samples on it

Total of distribution system residual samples on the SWTR summary form should be  $70+18= 88$

The updated Disinfectant Residuals Compliance form was not included in the email.

5. I have all included all four well lab reports.

6. The 4th quarter DBPR report is included.

---

**From:** Ghukasyan, Naira (CDPH-PS-DDWEM) [mailto:Naira.Ghukasyan@cdph.ca.gov]  
**Sent:** Wednesday, January 16, 2013 1:00 PM  
**To:** Stanley Vielma II; Oracion, Ofelia (CDPH-DDWEM)  
**Cc:** Gehovanny Herrera; Kevin Watson  
**Subject:** RE: December 2012 Monthly Reports for Beverly Hills - CDPH  
**Importance:** High

Hi Stanley,

There are a few issues that I noticed while reviewing water quality report for December submitted by Beverly Hills. I'd like to have a chance to discuss them with you:

- Did you collect repeat samples after TC + at 969 Larrabee St on 12/03/12? If yes, please send us copy of the Lab reports;
- How many routine samples were collected during December? There were 5 Mondays in December, so the total is  $14 \times 5 = 70$  not 104, isn't it?  
Then number of repeat samples supposed to be 18, but lab results show only 15?
- Please verify all numbers and revise accordingly the *TCR summary form (both pages)*, *SWTR summary form* and *Disinfectant Residuals Compliance form*;
- The lab reports for all four Wells were not included in the monthly RO WTP reports package;
- The 4<sup>th</sup> q. DBPR report also was not included.

Would you, please follow up on these issues and submit missing/revised reports ASAP?  
Thank you.

*Naira Ghukasyan*

Environmental Scientist  
California Department of Public Health  
500 North Central Avenue, Suite 500  
Glendale, CA 91203  
Phone: (818) 551-2021/ Fax: (818) 551-2054  
Email: [Naira.Ghukasyan@cdph.ca.gov](mailto:Naira.Ghukasyan@cdph.ca.gov)



---

**From:** Stanley Vielma II [<mailto:svielma@beverlyhills.org>]

**Sent:** Monday, January 07, 2013 1:27 PM

**To:** Ghukasyan, Naira (CDPH-PS-DDWEM); Oracion, Ofelia (CDPH-DDWEM)

**Cc:** Gehovanny Herrera; Kevin Watson

**Subject:** December 2012 Monthly Reports for Beverly Hills - CDPH

If you have any questions, please don't hesitate to call. Thank you.

Stan Vielma  
Water Worker III  
City of Beverly Hills  
O: (310) 285-2498  
F: (310) 288-2857  
[svielma@beverlyhills.org](mailto:svielma@beverlyhills.org)

**E-Mail from the City dated February 6, 2013**

**From:** Stanley Vielma II <svielma@beverlyhills.org>  
**Sent:** Wednesday, February 06, 2013 8:27 AM  
**To:** Ghukasyan, Naira (CDPH-PS-DDWEM)  
**Cc:** Gehovanny Herrera; Kevin Watson  
**Subject:** RE: 2nd resubmission of December 2012 Monthly Reports for Beverly Hills - CDPH  
**Attachments:** 2nd resubmission of 1212 CDPH report.pdf

02/06/13

Hello, this is a follow up explanation in regards to the December 2012 SWTR summary form and TCR summary. On the Disinfectant Residual Compliance form I have 89 samples collected, which is the total amount we collected that includes the 71 routine samples + the 18 resamples. The TCR summary and SWTR summary remained the same. The 2<sup>nd</sup> page for the TCR summary has been updated to reflect the 18 resamples.

Here is the breakdown on the routine samples as reported:

- 12/03/12 we sampled 15 sites.
  
- 12/10/12 we sampled 14 sites.
  
- 12/17/12 we sampled 14 sites.
  
- 12/24/12 we sampled 15 sites.
  
- 12/31/12 we sampled 13 sites.
  
- $15 + 14 + 14 + 15 + 13 = \underline{71}$

The TCR summary:

- 71 routine samples
  
- 18 repeat samples
  
- $71 + 18 = \underline{89}$

Thank you for your patience in this matter,  
Stan Vielma

---

**From:** Ghukasyan, Naira (CDPH-PS-DDWEM) [mailto:Naira.Ghukasyan@cdph.ca.gov]  
**Sent:** Tuesday, January 29, 2013 9:37 AM  
**To:** Stanley Vielma II  
**Cc:** Gehovanny Herrera; Kevin Watson  
**Subject:** RE: December 2012 Monthly Reports for Beverly Hills - CDPH  
**Importance:** High

Hi Stanley,  
Please, see my comments in red in the email below.  
Thanks,

*Naira Ghukasyan*

**Revised Monthly Summary of Distribution System Coliform Monitoring  
dated March 7, 2013**

## Oracion, Ofelia (CDPH-DDWEM)

---

**From:** Stanley Vielma II <[svielma@beverlyhills.org](mailto:svielma@beverlyhills.org)>  
**Sent:** Thursday, March 07, 2013 9:57 AM  
**To:** Oracion, Ofelia (CDPH-DDWEM)  
**Cc:** Kevin Watson; Gehovanny Herrera  
**Subject:** Updated Dec12 distribution coliform monitoring  
**Attachments:** Dec12 Resubmission Dist Coliform Monitoring.pdf

The corrected number of samples is 88, this includes 70 routine + 18 repeat samples for the month. Thank you for your patience in this matter.

Stan Vielma  
Water Worker III  
City of Beverly Hills  
O: (310) 285-2498  
F: (310) 288-2857  
[svielma@beverlyhills.org](mailto:svielma@beverlyhills.org)

**MONTHLY SUMMARY OF DISTRIBUTION SYSTEM  
COLIFORM MONITORING**

System Name <b>City of Beverly Hills</b>	System Number <b>1910156</b>
Sampling Period <b>December</b>	Year <b>2012</b>

	Number Required	Number Collected	Number Total Coliform Positives	Number Fecal/ E.coli Positives
1. Routine Samples (see note 1)	<u>70</u>	<u>70</u>	<u>6</u>	<u>0</u>
2. Repeat Samples Following Samples Which are Total Coliform Positive and Fecal/E.coli <i>Negative</i> (see notes 5 and 6)		<u>18</u>	<u>0</u>	<u>0</u>
3. Repeat Samples Following Routine Samples Which are Total Coliform <i>Positive</i> and Fecal/E.coli Positive (see notes 5 and 6)		<u>0</u>	<u>0</u>	<u>0</u>
4. MCL Computation For Total Coliform Positive Samples				
a. Totals (sum of columns)	<u>70</u>	<u>88</u>	<u>6</u>	
b. If 40 or more samples collected in month, determine percent of samples that are total coliform positive [(total number positive/total number collected) x 100]	<u>6.80%</u>			
c. Is system in compliance. ...with fecal/E. coli MCL? (see notes 2 and 3)	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No		
...with monthly MCL? (see note 4)	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No		

5. Invalidated Samples  
(Note what samples, if any, were invalidated; who authorized the invalidation; and when replacement samples were collected. Attach additional sheets, if necessary.)

6. Summary Completed By:

Signature 	Water System Worker III	Date <b>03-07-13</b>
---------------	-------------------------	-------------------------

**NOTES AND INSTRUCTIONS:**

1. Routine samples include:
    - a. Samples required pursuant to 22 CCR Section 64423, and any additional samples required by an approved routine sample siting plan established pursuant to 22 CCR Section 64422.
    - b. Extra samples required for systems collecting less than five routine samples per month that had one or more total coliform positives in previous month;
    - c. Extra samples for systems with high source water turbidities that are using surface water or groundwater under direct influence of surface water and do not practice filtration in compliance with regulations;
  2. Note: For a repeat sample following a total coliform positive sample, any fecal/E.coli positive repeat (boxed entry) constitutes an MCL violation and requires immediate notification to the department (22, CCR, Section 64426.1).
  3. Note: For repeat sample following a fecal/E.coli positive sample, any total coliform positive repeat (boxed entry) constitutes an MCL violation and requires immediate notification to the department (22, CCR, Section 64426.1).
  4. Total coliform MCL (Notify Department within 24 hours of MCL violation):
    - a. For systems collecting less than 40 samples, if two or more samples are total coliform positive, then the MCL is violated.
    - b. For systems collecting 40 or more samples, if more than 5.0 percent of samples collected are total coliform positive, then the MCL is violated.
  5. Positive results and their associated repeat samples must be tracked on the worksheet on the other side.
  6. For systems collecting more than one routine sample per month, three repeat samples must be collected for each total coliform positive sample. Repeat samples must be collected within 24 hours of being notified of the positive results.
  7. For systems collecting one or less routine samples per month, four repeat samples must be collected for each total coliform positive sample.
- DHS 8477 (10/2004)

Press Release by the City dated March 8, 2013



Office of Communications  
City of Beverly Hills  
455 N. Rexford Dr.  
Beverly Hills, CA 90210-4817  
[www.beverlyhills.org](http://www.beverlyhills.org)

For Immediate Release  
March 8, 2013  
Contact: Therese Kosterman  
(310) 285-2456

### **City Informs Residents of Traces of Non-Harmful Coliform Bacteria in Beverly Hills Drinking Water**

Beverly Hills, CA – Samples of Beverly Hills drinking water taken in December showed the presence of the common, generally non-harmful coliform bacteria that registered slightly above state of California standards. Weekly testing since December has shown the City's water supply to be safe and well within state standards.

The California standard is that no more than 5% of water samples may contain coliform bacteria. In December 2012, 6.82% of samples showed the presence of the bacteria.

Coliform bacteria are very common in the environment and are generally not harmful. However, people with severely compromised immune systems, infants, and some elderly people who may have been exposed are encouraged to talk to their health care providers about possible risks.

Testing for coliform is conducted because its presence may indicate a problem with the water delivery system, which might introduce more harmful bacteria such as *E. coli*. Further testing was immediately conducted after the coliform bacteria samples were discovered. The additional testing came back negative for both coliform and any other type of bacteria.

Anytime water samples containing coliform bacteria exceed standards, by state law all water customers must be notified. However, City staff was unaware of the noticing requirement until March 6, 2013. Water customers are now being notified through the media, on **the City's** website and through the mail.

The City is confident that the Beverly Hills water supply is very safe and the coliform most likely was introduced into the water samples because of stormy weather conditions during the testing. Procedures to ensure the integrity of the testing process and have since been introduced. In addition, future test results will be double-checked by staff.

##

**The Summaries of the Results for all Bacteriological Quality Samples and  
Nitrite Samples Collected in December 2012 and Chlorine Residual  
Measurement Results**

Summary of Bacteriological Quality Samples  
 City of Beverly Hills  
 Dec-12

		12/3/2012	12/4/2012	12/10/2012	12/17/2012	12/24/2012	12/26/2012	12/28/2012	12/31/2012
Wells	Well 2		A						
	Well 4				P				
	Well 5		P						
	Well 6		A						
Treatment Plant	RO Effluent				P			P	A
	Plant Effluent				A			A	A
MWD Connection	BH-1								
MWD Connection	BH-2								
Entry Point	Sunset Reservoir								
Reservoirs	Woodland Reservoir								
	Coldwater Reservoir								
	3A Reservoir								
	Greystone Reservoir								
	4B Reservoir								
	Reservoir #5								
Reservoir #6									
Distribution System	231 S. Gale Dr.	A		A	A	A			A
	530 N. La Cienega Bl.	A		A	A	A			A
	969 Larrabee St.	P	A			P	A		
	949 Larrabee Dr.		A				A		
	976 Lamabee Dr.		A				A		
	618 N. Sierra Dr.	A		A	A	A			A
	1022 Woodland Dr.	A		A	A	A			A
	725 N. Roxbury Dr.	A		A	A	A			A
	915 N. Roxbury Dr.			A					A
	1242 Lago Vista Dr.				A				
	1023 Hillcrest Rd.				A				
	465 Martin Ln.				A				
	1715 Green Acres Dr.	A				P	A		
	1725 Green Acres Dr.						A		
	1705 Grren Acres Dr.						A		
	1112 Tower Rd.	A				P	A		
	1100 Tower Rd.						A		
	1118 Tower Rd.						A		
	1114 Wallace Ridge			A					A
	435 Trousdale PL			A					A
	410 Walker Dr.	A		A	A	P			A
	415 Walker Dr.								
	1950 Carla Ridge						A		
	610 Canon Dr.	A		A	A	A			A
	124 S. Maple Dr.	A		A	A	P	A		
	120 S. Maple Dr.						A		
	140 S. Maple Dr.						A		
	437 S. Doheny Dr.	A		A	A	A			A
9561 Olympic Blvd.	A		A	A	A			A	
255 Lasky Dr.	A		A	A	A			A	

## Summary of Chlorine Residual Measurements Results

City of Beverly Hills

Dec-12

		12/3/2012	12/4/2012	12/10/2012	12/17/2012	12/24/2012	12/26/2012	12/31/2012
MWD Connection	BH-1	2.04		2.1	1.97	2.1		2.17
MWD Connection	BH-2	2.01		2.04	1.95	2.02		2.07
Entry Point	Sunset Reservoir	1.78		1.94	1.78	1.99		1.53
Reservoirs	Woodland Reservoir	2.06		2.11	1.43	0.56		O/S
	Coldwater Reservoir	1.79		1.78	1.43	1.64		2.04
	3A Reservoir	1.93		1.74	1.77	1.34		1.74
	Greystone Reservoir	1.66		1.5	1.93	1.35		1.05
	4B Reservoir	1.63		1.4	0.87	0.37		0.76
	Reservoir #5	1.59		1.38	1.26	0.64		1.23
	Reservoir #6	1.21		0.99	0.25	0.84		1.33
Distribution System	231 S. Gale Dr.	1.61		1.61	1.5	1.41		1.51
	530 N. La Cienega Bl.	1.53		1.4	1.36	1.01		1.53
	969 Larrabee St.	1.73	1.49			1.12	1.38	
	949 Larrabee Dr.		1.59				1.31	
	976 Lamabee Dr.		1.13				1.37	
	618 N. Sierra Dr.	1.5		1.03	1.45	0.82		1.54
	1022 Woodland Dr.	2.04		2.03	1.97	1.53		1.12
	725 N. Roxbury Dr.	1.43		1.09	1.3	1.2		1.59
	915 N. Roxbury Dr.			1.22				1.33
	1242 Lago Vista Dr.				1.23			
	1023 Hillcrest Rd.				1.86			
	465 Martin Ln.				0.21			
	1715 Green Acres Dr.	1.06			0.22	1.3	0.72	
	1725 Green Acres Dr.						1.01	
	1705 Green Acres Dr.						0.88	
	1112 Tower Rd.	1.29				1.76	1	
	1100 Tower Rd.						1.41	
	1118 Tower Rd.						0.96	
	1114 Wallace Ridge			1.72				0.78
	425 Trousdale PL			1.88				1.23
	410 Walker Dr.	1.05		0.79		0.58	0.49	1
	415 Walker Dr.						1.54	
	1950 Carla Ridge						1.19	
	610 Canon Dr.	1.97		2.01	2.08	1.22		1.56
	124 S. Maple Dr.	1.82		1.96	1.74	1.95	2.02	1.68
	120 S. Maple Dr.						1.95	
	140 S. Maple Dr.						1.94	
437 S. Doheny Dr.	1.31		1.41	1.17	1.38		1.21	
9561 Olympic Blvd.	1.49		1.61	1.39	1.42		1.31	
255 Lasky Dr.	1.58		1.22	1.49	1.18		1.26	

Repeat Sample Site

Total Chlorine Residual &lt; 1 mg/L

Summary of Nitrite Measurements Results  
 City of Beverly Hills  
 Dec-12

	Sunset Reservoir	Woodland Reservoir	Coldwater Reservoir	3A Reservoir	Greystone Reservoir	4B Reservoir	Reservoir #5	Reservoir #6	
12/3/2012	ND	ND	ND	ND	ND	0.0057	ND	0.0172	
12/10/2012	ND	ND		0.0106	0.0105	0.0255	0.024	0.0105	0.0253
12/17/2012	ND		0.0265	0.0246	0.0124	0.0068	0.0897	0.0084	ND
12/24/2012	ND		0.0894	0.0293	0.0123	0.0219	0.006	ND	ND
12/31/2012	ND	NA		0.0066	0.0112	0.0558	ND	ND	ND

**Proof of Public Notification Form**

**PROOF OF NOTIFICATION**

Name of Water System: **City of Beverly Hills**

System Number: 1910156

**Certification of Notification for  
Total Coliform MCL Violation**

As required by *California Code of Regulations*, Title 22, Section 64463.4, *Tier 2 Public Notice*, I notified the users of the water supplied by the City of Beverly Hills of the violation of Section 64426.1, Title 22, *California Code of Regulations*. 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	<input type="text"/>
Specify            other            method            used:	
_____	

\_\_\_\_\_  
Signature of Water System Representative

\_\_\_\_\_  
Date

**ATTACH A COPY OF THE NOTICE USED.**

**THIS FORM MUST BE COMPLETED AND RETURNED TO THE DEPARTMENT**