



State of California—Health and Human Services Agency  
California Department of Public Health



RON CHAPMAN, MD, MPH  
Director & State Health Officer

EDMUND G. BROWN JR.  
Governor

January 31, 2013

Ms. Wendy Dailey  
Vice President of Buildings and Properties  
YMCA of the East Bay  
2330 Broadway  
Oakland, CA 94612

Dear Ms. Dailey:

**CITATION NO. 02-17-13C-002  
DISINFECTION BYPRODUCTS MAXIMUM CONTAMINANT LEVEL VIOLATION  
CAMP LOMA MAR, WATER SYSTEM NO. 4100529**

Enclosed is a citation issued to Camp Loma Mar (hereafter, Water System or CLM). The citation is issued as the Water System failed to comply with Section 64533 of the Disinfectants and Disinfection Byproducts Rule (D/DBPR), Chapter 15.5, Title 22, California Code of Regulations (CCR). The drinking water provided by the Water System to its users exceeded the maximum contaminant levels for both total trihalomethanes (TTHM) and haloacetic acids (five) (HAA5) in the third and fourth quarters of 2012.

The attached citation consists of four sections: Violation, Background, Directives, and Civil Penalties. The Violation and Background sections describe the events leading up to the issuance of the citation. The Directives section specifies what CLM needs to do to return to compliance. The Civil Penalty section describes fees to be assessed for failure to comply with the citation. No civil penalty is levied with the current citation.

If you have any questions regarding this letter, please contact Jose P. Lozano IV, P.E. at (510) 620-3459 or me at (510) 620-3453.

Sincerely,

Eric Lacy, P.E.  
District Engineer  
Santa Clara District  
Drinking Water Field Operations Branch

Ms. Wendy Dailey  
January 31, 2013  
Page 2

Enclosures: Sample Notice (Attachment A)  
Proof of Notification form (Attachment B)

Certified Mail 7007 0710 0000 5917 2125

cc: San Mateo County Environmental Health Department (w/ encl.)

Ms. Wendy Dailey  
January 31, 2013  
Page 2

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Proof of Notification form (Attachment B)

Certified Mail 7007 0710 0000 5917 2125

cc: San Mateo County Environmental Health Department (w/ encl.)

bcc: E. Pelen, Fileserver: 4100529\Enforcement\2012 TTHM and HAA5 MCL vio.Cit (w/  
encl.)  
W4100529/130129.cit.ltr

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**STATE OF CALIFORNIA  
DEPARTMENT OF PUBLIC HEALTH**

RE: Water System No. 4100529  
Camp Loma Mar  
9900 Pescadero Creek Road  
Loma Mar, CA 94021

TO: Ms. Wendy Dailey  
Vice President of Buildings and Properties  
YMCA of the East Bay  
2330 Broadway  
Oakland, CA 94612

**CITATION FOR NONCOMPLIANCE  
Total Trihalomethanes and Haloacetic Acids (Five) Maximum Contaminant  
Levels  
Third and Fourth Quarters of 2012**

Section 116650, Chapter 4 of Part 12 of Division 104 of the California Health and Safety Code (CHSC), authorizes the issuance of a citation for failure to comply with a requirement of Chapter 4 (California Safe Drinking Water Act), or any regulation, permit, standard, or order issued there under.

Violation

The Drinking Water Field Operations Branch of the California Department of Public Health (hereinafter, Department) hereby issues a citation to Camp Loma Mar (hereinafter, Water System or CLM) (Mailing address: 9900 Pescadero Creek Road, Loma Mar, CA) for failure to comply with the maximum contaminant levels (MCL) for Total Trihalomethanes (TTHM) and Haloacetic Acids (Five)

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3 (HAA5), as specified in Section 64533 of the Disinfectants and Disinfection  
4 Byproducts Rule (D/DBPR), Chapter 15.5, Title 22, California Code of  
5 Regulations (CCR), in the third and fourth quarters of 2012. A public water  
6 system shall not exceed 0.080 milligrams per liter (mg/L) for TTHM or 0.060 mg/L  
7 for HAA5 in the drinking water supplied to the public based on a running annual  
8 arithmetic average (RAA), calculated at a location in the distribution system  
9 representing maximum residence time, of quarterly averages covering any  
10 consecutive four-quarter period. In the third and fourth quarters of 2012, the  
11 drinking water supplied by CLM, as collected from its monitoring location  
12 representing maximum residence time (Faucet #8), had a RAA for the TTHM of  
13 0.105 mg/L and 0.147 mg/L, respectively. Also, the HAA5 RAA values for the  
14 third and fourth quarters of 2012 were 0.096 mg/L and 0.111 mg/L, respectively.  
15

16  
17 In accordance with Section 116650(e), CHSC, this violation is classified as a  
18 continuing violation.  
19

20 Background

21 CLM is a community water system, located at 9900 Pescadero Creek Road,  
22 Loma Mar, CA, that serves an all-ages camp for the YMCA and its community  
23 partners, Exploring New Horizons and Youth Enrichment Strategies. CLM was  
24 previously classified as a transient non-community water system because of the  
25 transient population the camp receives during the high season, but was  
26 determined to be a community water system, based on the residential population.  
27

CLM was consequently instructed to comply with the source and distribution



system water quality requirements for community water systems (CWSs) under Chapter 15, Title 22, CCR. The Department directed CLM to conduct, in the first quarter of 2012, initial Disinfection Byproducts (DBP) monitoring (specifically for Total Trihalomethanes (TTHM) and Haloacetic Acids (Five) (HAA5)) in the distribution system at a location representing maximum residence time.

CLM conducted the initial DBP monitoring at a location in the distribution system representing maximum residence time – Faucet #8 - on February 16, 2012 (the second month of the first quarter of 2012). The TTHM and HAA5 results were 0.165 mg/L and 0.185 mg/L, respectively, which are both above the MCLs of 0.080 mg/L and 0.060 mg/L, respectively. Therefore, the Department, in accordance with Section 64534.2(a), Title 22, CCR, required CLM to conduct monitoring of TTHM and HAA5 in the distribution system on a quarterly basis in the second month of each quarter. The results of CLM's quarterly TTHM and HAA5 monitoring are as follows:

Quarter	TTHM Concentration [mg/L]	TTHM Running Annual Average [mg/L]	HAA5 Concentration [mg/L]	HAA5 Running Annual Average [mg/L]
2012, First Quarter	0.165		0.185	
2012, Second Quarter	0.080		0.060	
2012, Third Quarter	0.174	0.105	0.137	0.096
2012, Fourth Quarter	0.170	0.147	0.060	0.111

The RAA for both TTHM and HAA5 have exceeded the MCLs and this has



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3 resulted in a violation of the D/DBPR, Chapter 15.5, Title 22, CCR for the third  
4 and fourth quarters of 2012.

5 Directives

6  
7 The Water System is hereby directed to take the following actions:

- 8  
9 1. Immediately cease and desist from failing to comply with Section 64533,  
10 Chapter 15.5, Title 22, CCR.  
11 2. Conduct public notification for the TTHM and HAA5 MCL violation in  
12 conformance with Section 64463.4, Chapter 15.5, Title 22, CCR within  
13 thirty (30) days upon receipt of this citation. The notification shall be  
14 completed in accordance with each of the following methods:  
15 a. Continuous posting in conspicuous locations throughout the area  
16 served by the water system; and  
17 b. Direct delivery to each employee.  
18

19 A sample copy of public notification for your use in notifying the public  
20 and your employees is enclosed for your reference and use (Attachment  
21 A). Complete Attachment B (Proof of Notification form) and return it to the  
22 Department by March 9, 2013. A copy of the notice used shall be  
23 attached to the Proof of Notification form.  
24

25 Public notification, by continuous posting and by hand-delivery to persons  
26 employed by the Water System or living at the facility shall be repeated  
27 every three months until the TTHM and HAA5 MCL exceedance problem  
is resolved. A completed Proof of Notification form, together with a copy



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of the notice used, shall be provided to the Department each time the notice is re-issued.

3. Submit a corrective action plan (CAP) and time schedule to the Department, by March 9, 2013 that describes how CLM will return to compliance with the maximum contaminant levels for both TTHMs and HAA5. The CAP shall include all steps that will be followed, with deadlines for completion, leading up to full compliance with the disinfection byproducts standards. Compliance shall be achieved as soon as possible and no later than September 9, 2013.

4. Begin performing monthly monitoring in February 2013 for TTHM and HAA5 at Faucet #8. The results of the TTHM and HAA5 monitoring shall be submitted to the Department no later than the tenth day of the month following the monitoring.

All submittals to the Department are to be addressed to:

Mr. Eric Lacy, P.E.  
District Engineer  
Santa Clara District  
Department of Public Health  
Drinking Water Field Operations Branch  
850 Marina Bay Parkway  
Building P, 2<sup>nd</sup> Floor  
Richmond, CA 94804-6403



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Civil Penalty

Sections 116650(d) and 116650(e), CHSC allow for the assessment of a civil penalty for failure to comply with the requirements of Chapter 4. Failure to comply with any provision of this citation will result in the Department imposing a civil penalty not to exceed one thousand dollars (\$1000) per day as of the date of violation of any provision of this citation.

January 31, 2013  
Date

  
Eric Lacy, P.E.  
District Engineer  
Santa Clara District  
Drinking Water Field Operations Branch

Attachments

CERTIFIED MAIL # 7007 0710 0000 5917 2125

cc: San Mateo County Environmental Health Department (w/ attachments)



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Eric Lacy, P.E.  
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cc: San Mateo County Environmental Health Department (w/ attachments)

bcc: Fileserver – 4100529\Enforcement\2012 TTHM and HAA5 MCL vio.Cit  
W4100529\120123.cit.doc



**IMPORTANT INFORMATION ABOUT YOUR DRINKING WATER**

**Total Trihalomethanes (TTHM) and Haloacetic Acid 5 (HAA5) MCL Violations at Camp Loma Mar.**

Our water system recently violated a drinking water standard. Although this incident was not an emergency, as our customers, you have a right to know what happened and what we did (are doing) to correct this situation.

We routinely monitor for the presence of drinking water contaminants. Average testing results from February 2012 to November 2012 show that our system exceeded the maximum contaminant level (MCL) for TTHM and HAA5 in the third and fourth quarters of 2012. The MCL for TTHM is 0.080 mg/L, while the MCL for HAA5 is 0.060 mg/L. It is determined by calculating the running annual average (RAA) of quarterly averages covering any consecutive four-quarter period at a location in the distribution system representing maximum residence time. In the third quarter of 2012, the RAA TTHM and HAA5 concentrations, collected from our designated monitoring location, were 0.105 mg/L and 0.096 mg/L, respectively. In the fourth quarter of 2012, the RAA TTHM and HAA5 concentrations, collected from our designated monitoring location, were 0.147 mg/L and 0.111 mg/L, respectively.

**What should I do?**

- There is nothing you need to do. You do not need to boil your water or take other corrective actions. If a situation arises where the water is no longer safe to drink, you will be notified within 24 hours.
- If you have a severely compromised immune system, have an infant, are pregnant, or are elderly, you may be at increased risk and should seek advice from your health care providers about drinking this water.

**What does this mean?**

This is not an emergency. If it had been an emergency, you would have been notified within 24 hours.

The California Department of Public Health (CDPH) sets drinking water maximum contaminant levels and requires the disinfection of drinking water. However, when used in the treatment of drinking water, disinfectants react with naturally-occurring organic and inorganic matter present in water to form chemicals called disinfection byproducts (DBPs). CDPH has determined that a number of DBPs are a health concern at certain levels of exposure. Some people who drink water containing total trihalomethanes and haloacetic acids in excess of the respective MCLs over many years may have an increased risk of getting cancer.

**What is being done?**

[Describe corrective action.] We anticipate resolving the problem within [estimated time frame].

For more information, please contact [name of contact person] at [Phone number]

*\*Please share this information with all the other people who drink this water, especially those who may not have received this notice directly. You can do this by posting this notice in a public place or distributing copies by hand or mail.\**

This notice is being sent to you by Camp Loma Mar, State Water System ID#: 4100529.

Date distributed: \_\_\_\_\_.

**PROOF OF NOTIFICATION**

**Citation Number 02-17-13C-002**

Camp Loma Mar  
System Number: 4100529

As required by Section 116450 of the California Health and Safety Code, I notified the users of the water supplied by Camp Loma Mar of the violations of Title 22, California Code of Regulations (CCR) for the third and fourth quarters of 2012. I complied with the directives of this citation as indicated below:

Required Action

Date Completed

Conduct Public Notification – (Attach copy of the notice.)

Submit Corrective Action Plan and Schedule


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

\_\_\_\_\_  
Date

**THIS FORM MUST BE COMPLETED AND RETURNED TO THE DEPARTMENT. A COPY OF THE POSTED NOTICE MUST BE ATTACHED TO THIS FORM.**

**Disclosure:** Be advised that Section 116725 and 116730 of the California Health and Safety Code states that any person who knowingly makes any false statement on any report or document submitted for the purpose of compliance with the attached citation may be liable for a civil penalty not to exceed five thousand dollars (\$5,000) for each separate violation for each day that violation continues. In addition, the violators may be prosecuted in criminal court and upon conviction, be punished by a fine of not more than \$25,000 for each day of violation, or be imprisoned in county jail not to exceed one year, or by both the fine and imprisonment.