



EDMUND G. BROWN JR.
GOVERNOR

MATTHEW RODRIGUEZ
SECRETARY FOR
ENVIRONMENTAL PROTECTION

State Water Resources Control Board

Division of Drinking Water

May 26, 2016

Ms. Sophie James
Director of Water Quality
California Water Service Company
1720 N. 1st Street
San Jose, CA 95112

SYSTEM NO. 1910050: 2015 SANITARY SURVEY

Dear Ms. James:

This letter is to advise the California Water Service Company (CWSC) of the findings during the 2015 Sanitary Survey of the City of Commerce (City) water system. The sanitary survey consists of the review of water system files and water quality monitoring records, and a field inspection.

On March 13, 2015, Ms. Ofelia Oracion, a sanitary engineer with our office met with Mr. Daniel Armendariz, Jr., CWSC-East Los Angeles (ELA) District Manager, Mr. James Crawford, CWSC-ELA District General Superintendent, Mr. Richard Shephard, CWSC-ELA District Water Production Superintendent, and Ms. Jackie Takeda, CWSC Water Quality Project Manager. Issues related to water quality monitoring and operation and maintenance of the water system including customer complaint records, facility maintenance and cleaning records, cross-connection survey and backflow assembly annual test records, and regulatory compliance records, among others, were discussed. Ms. Oracion was accompanied by Mr. Armendariz, Mr. Crawford, Mr. Shephard and Ms. Takeda on her field inspection of the sources (groundwater wells and the MWD connections), treatment facilities (disinfection, GAC, and manganese greensand), pumping/booster stations, tanks/reservoirs and sampling stations.

Overall, the Division of Drinking Water (Division) of California State Water Resources Control Board finds that the City's water system is being operated and maintained satisfactorily. However, there are a few deficiencies that need to be addressed. The following paragraphs summarize issues/deficiencies noted during the survey which require your attention:

Water System Facility

1. Well 3E has been inactive for more than 19 years. Because the City has no plan to reactivate this well, the City should properly destroy the well as soon as possible. Please note that this deficiency had been identified during the 2012 Sanitary Survey.

Water Quality Monitoring

2. Perchlorate monitoring is annually for Wells 4-01 and 7-01, unless detected. Perchlorate samples were last collected in May 2015 and June 2015 from Wells 4-01 and Well 7-01, respectively. Perchlorate was not detected in both samples. The next perchlorate sampling for Well 4-01 and Well 7-01 is due in May 2016 and June 2016, respectively.
3. The City's water system is classified as a Schedule 1 system under Stage 2 Disinfectant/Disinfection By-Product Rule (DBPR). The City is part of the combined distribution system of MWDSC, which is serving more than 100,000 people. Per the approved Stage 2 DBPR Monitoring Plan, the City is required to collect dual samples (one for TTHM and one for HAA5) from the two approved sites (5800 Todd Avenue and 7000 Bandini Blvd.) every 90 days during the second week of January, April, July and October each year, starting in April 2012. However, the review of the monitoring data indicated the City had deviated from the approved monitoring schedule. As such, the City is in violation of the Stage 2 DBPR monitoring requirements. A warning letter has been mailed to the City on May 25, 2016. The following table summarizing the monitoring results:

Table 1: Stage 2 DBPR Monitoring Results (2012 -2015)

Year	Dates	Locational Quarterly Result, Range (µg/L)		Locational Running Annual Average, Range (µg/L)		Operational Evaluation Level	
		TTHM	HAA5	TTHM	HAA5	TTHM	HAA5
2012	4/10	2.2 – 9.8	0.0 – 1.8	–	–	-	-
	7/10	2.3 – 6.3	0.0 – 1.2	–	–	-	-
	10/9	10.5 – 11.6	2.0 – 2.4	–	-	-	-
2013	1/15 ¹	8.6 – 9.9	1.5 – 1.8	6.2 – 9.1	1.1 – 1.6	7.8 – 9.2	1.5 – 1.6
	4/9	5.9 – 6.5	1.1 – 1.2	7.1 – 8.3	1.3 – 1.5	8.0 – 8.4	1.5 – 1.6
	7/12	6.4 – 25.2	1.5 – 11.3	8.3 – 12.8	1.6 – 4.2	7.3 – 16.2	1.4 – 6.4
	10/8	11.2 – 12.0	3.2 – 3.3	8.5 – 12.9	1.9 – 4.4	8.8 – 13.8	2.3 – 4.8
2014	1/13 ¹	11.0 – 11.5	1.4 – 1.5	8.9 – 13.5	1.9 – 4.3	10.2 – 14.8	1.9 – 4.4
	4/15 ¹	9.4 – 9.4	0.0 – 1.7	9.6 – 14.4	1.6 – 4.4	10.4 – 10.5	1.2 – 2.3
	7/15 ¹	9.5 – 38.6	3.2 – 22.0	10.5 – 17.7	2.4 – 6.7	9.9 – 24.5	2.4 – 11.4
	10/14 ¹	8.1 – 19.0	0.0 – 6.8	9.5 – 19.6	1.6 – 7.6	8.8 – 21.5	1.2 – 8.9
2015	1/12	9.3 – 9.9	0.0 – 0.0	9.1 – 19.2	1.2 – 7.2	9.1 – 19.4	0.8 – 7.2
	4/15 ¹	2.2 – 10.2	0.0 – 0.0	7.3 – 19.4	0.8 – 7.2	5.5 – 12.3	0.0 – 1.7
	7/14 ¹	43.6 – 44.2	20.0 – 22.0	16.0 – 20.7	5.0 – 7.2	25.0 – 26.8	10.0 – 11.0
	11/03 ²	43.6 – 44.2	20.0 – 22.0	16.0 – 20.7	5.0 – 7.2	25.0 – 26.8	10.0 – 11.0

¹ Samples were collected not in accordance with the approved monitoring plan. The City collected the samples on the third week instead of the second week.

² Sample collected in the wrong month.

Operation and Maintenance

4. Reportedly, the City drains, cleans and inspects the interior of the tanks for structural integrity and interior coating condition once every five years. Station 4, Tank 1 was last inspected and

cleaned in May 2010. Station 7, Tank 1 was last inspected and cleaned in March 2011. Station 4, Tank 1 and Station 7, Tank 1 have past due for inspection and cleaning.

5. The City will use polyaluminum hydroxychlorosulfate to aid in settling the particulate matter in the reclaim tank at Station 7. The chemical is not maintained on site. The OM&M Plan for Station 7 Greensand Filtration System does not describe the dosage determination and application method. The City must revise the plan and include the discussion on this chemical. The revised plan must be submitted to the Division by July 31, 2016.
6. The Division has no record on file of the City's initial and follow-up cross-connection surveys. According to CWSC, the records for cross-connection preventers in the City are incomplete. CWSC conducted an internal audit of the cross-connection program in the past and discovered that the City's water system had incomplete records. For this reason, CWSC had elected not to enter the last survey dates on their Annual Report to the Drinking Water Program (ARDWP). Reportedly, CWSC is conducting an ongoing survey for the City. When the survey is completed, the City should contact the Division to schedule a follow-up site visit and make the records available for inspection. Please note that this deficiency had been identified in the 2012 Sanitary Survey findings. Please inform the Division the status of the survey and the timeline for completing the initial surveys.
7. The City has 984 valves in the distribution system with sizes ranging from 0.75 to 16 inches. According to CWSC's valve exercising program, the goal is to exercise each valve every five years. However, based on the ARDWPs on file with the Division, none of these valves was exercised during the past five years from 2011 through 2015. Ideally, valves should be exercised annually. The City must schedule to exercise the valves as soon as possible. By July 31, 2016, the City must submit to the Division the target schedule to complete exercising all valves.
8. The City has 54 dead-ends in the distribution system. Out of the 54 dead-ends, 16 are equipped with either blow-off valves or fire hydrants. According to CWSC's flushing program, the goal is to flush each dead-end a minimum of every five years, and more frequent when needed. However, based on the ARDWP on file with the Division, none of these dead-ends was flushed in the past five years from 2011 through 2015. Ideally, dead-ends must be flushed annually and more frequent on areas with water quality issues. CWSC indicates due to the current drought, the customers of the City do not want to see them waste the water. It was discovered during the sanitary survey that the City did not have a distribution system general physical monitoring program. Consequently, the City initialed the general physical monitoring program in December 2015. The City must continuously monitor the physical water quality in the distributions system, and based upon the results flush the system when needed.

*drought
mandated.*

We would like to take this opportunity to update you the status of the full permit revision for the City's water system. The domestic water supply permit for the City's water system (April 21, 1978) is more than 38 years old. An engineering report supporting the full permit revision has been drafted and is under review currently. The revised full permit will be issued in the near future.

The courtesy extended to Ms. Oracion during her field visits is greatly appreciated. Please indicate your intention in addressing the above issues in writing within 15 days of receipt of this letter. If you have any questions, please contact Ms. Ofelia Oracion at (818) 551-2020.

Sincerely,



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

cc: Mr. Daniel Armendariz, Jr., District Manager
California Water Service
2000 S. Tubeway Ave.
Commerce, CA 90040

Mr. James Crawford, General Superintendent
California Water Service
5243 East Sheila Street
Commerce, CA 90040

Mr. Richard Shephard, Water Production Superintendent
California Water Service
5243 East Sheila Street
Commerce, CA 90040

Ms. Dipti Shah, Water Quality Project Manager
California Water Service
2632 W. 237th Street
Torrance, CA 90505-5272