



DIANA M. BONTÁ, R.N., Dr. P.H.
Director

State of California—Health and Human Services Agency
DEPARTMENT OF HEALTH SERVICES

Division of Drinking Water and Environmental Management
415 Knollcrest Drive, Suite 110
Redding, CA 96002
(530) 224-4800 FAX (530) 224-4844
Internet Address: www.dhs.ca.gov



GRAY DAVIS
Governor

resent 11-7-03
November 3, 2003

Pla-Vada Community Association
P. O. Box 1035
Soda Springs, CA 95728-1035

Attention: Board of Directors

Subject: Public Water System #2910011-Annual System Inspection

On October 10, 2003, I met with Chic Brenneman and Brian Silsby, to make an annual inspection of the Pla-Vada Community Association's (PVCA's) public water supply system. The assistance and cordial reception provided by Chic and Brian was very much appreciated.

Enclosed for your information is my memorandum report on the inspection. Also enclosed is our water system deficiency record, showing the defects that were noted during the inspection. I have summarized the major defects below. Please feel free to call me at any time you have questions about the report or the nature of the deficiencies.

The overall operation of the PVCA's water system was found to be satisfactory. The operator, Brian Silsby, has done a commendable job in maintaining important system operational records and keeping the system facilities in good condition. We also commend the Association for abandoning a number of springs and infiltration wells that were of generally shallow construction and very susceptible to contamination. Eliminating these facilities has definitely improved the sanitary reliability of the water system. There are, however, some serious system deficiencies and long overdue requirements still to be addressed.

The PVCA needs to aggressively pursue compliance with the state and federal regulations and address the following issues:

1) Adequate Source Capacity

The current system source capacity does not meet minimum Water Works Standards. PVCA recognizes the need to develop additional source capacity and is currently pursuing negotiations for an additional 11 gallons per minute (gpm). We fully support this effort, however, an additional 11 gpm will not be enough to meet the needed source capacity. PVCA must develop a plan and time line for providing source and storage capacity in compliance with the Water Works Standards. The plan and time line needs to be submitted by no later than **December 31, 2003**. The Department may consider imposing a service moratorium if the source and storage issue is not addressed in a timely manner. (*Section 64562, Title 22, California Code of Regulations, specifically states that*



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"Sufficient water shall be available from the water sources and distribution reservoirs to supply adequately, dependably and safely the total requirements of all users under maximum demand conditions before agreement is made to permit additional service connections to a system.")

2) Meters

The existing services are not metered. State law mandates that all new domestic water services be outfitted with meters. The PVCA needs to start implementing the meter requirements and proceed with metering all new services. Metered water usage is generally considerably less than "flat rate" water consumption and could be an important factor in the Association's pursuit of additional source and storage capacity.

3) Cross-Connection Control Program

State regulations require that all public water systems develop an approved cross-connection control program and have procedures in place that allow the utility to enforce all provisions of the cross-connection control program. This requirement was a condition of the water supply permit issued to PVCA in 1988. The PVCA needs to act in a timely manner to comply with this permit provision. By **December 31, 2003**, the PVCA must submit in writing, a plan and time line for adopting and implementing an approved cross-connection control program rule, which includes all the elements outlined in the enclosed copy titled "Elements of a Cross-Connection Control Program".

4) Chemical and UCMR Monitoring

In reviewing our database, we find that the PVCA chemical and Unregulated Chemical monitoring and reporting is not in compliance with the Water Quality and Monitoring Regulations. I am enclosing a summary of the existing chemical analyses in our database. Also enclosed is a summary of the chemical and unregulated chemical monitoring requirements now due. If you have information that shows data, which is not included in our database, you need to submit it as soon as possible, but no later than **December 31, 2003**. We will update our database with any information that you submit.

5) Radiological Monitoring

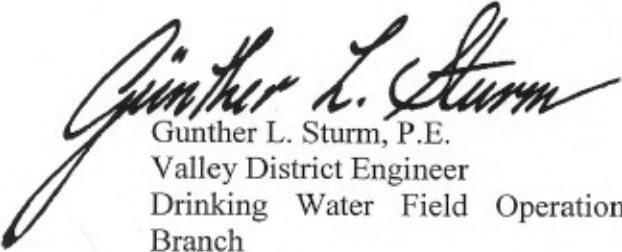
The water supply permit issued to PVCA in 1988 also had a condition that required the PVCA to collect four quarters of radiological analyses from each source. Our database does not show any radiological water quality analyses from Well #3 and Well #4. If you have the data that shows the analyses were taken, please submit the data. If no analyses were made, you are required to initiate the 1st calendar quarter analyses by taking a radiological water quality sample from each of the wells (Well #3 and Well #4) prior to **December 31, 2003**, and arrange with your laboratory to collect the remaining three calendar quarter analyses in January-March, April-June and July-September 2004.

During my inspection on October 10, 2003, I reviewed your existing sample siting plan (BSSP). I made some suggestions for adding and deleting routine sampling stations. Please update the

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enclosed copy of your BSSP to reflect the changes, and return a copy of the revised/updated plan to this office.

Again, I want to express my appreciation to Chik Brenneman and Brian Silsby, for accompanying me on the inspection. If you have questions on any of the issues discussed above or any other matter pertaining to your water system, please call me.



Gunther L. Sturm, P.E.
Valley District Engineer
Drinking Water Field Operations
Branch

Enclosures

cc: Nevada County Department of Environmental Health

GLS