

Park Royal Mutual Water Company

May 21, 2021

Dear Park Royal Mutual Water Company Member,

You are receiving this notice as a member of the Park Royal Mutual Water Company. The California State Water Resources Control Board has notified the Park Royal Mutual Water Company Board of Directors of a water quality violation, Compliance Order Number 02_18_21R_006. A copy of the citation is included with this letter. The violation is for exceeding the maximum contaminant level of arsenic in the Park Royal Mutual Water Company wells. The Board of Directors will be working with our water servicer, Weeks Drilling & Pump to develop the plan to evaluate the water supply and research options to correct the problem. In collaboration with Weeks Drilling & Pump the Board of Directors will create the remedy action plan as directed in the compliance order.

This notice is being delivered electronically via email, via printed copy (USPS) and will be posted on the water company website (prmw.com). A copy of this notice has been sent to the Sonoma County Environmental Health & Safety: Public Health Division. This notice is being published in English and Spanish.

Sincerely,
Erin Fender
Kristen Tantarelli
Keith Roark

Park Royal Mutual Water Company Board of Directors

The following service addresses in the state of California, County of Sonoma are receiving this notice:

103 Coronation	4445 Hall ***
107 Park Royal	4453 Drury
109 Coronation	4455 Hall
110 Coronation	4457 Drury
115 Coronation	4457 Regent
127 Coronation	4458 Regent
135 Park Royal	4459 Abbey
139 Coronation	4460 Crown
142 Coronation	4461 Abbey
145 Coronation	4461 Drury
149 Park Royal	4461 Regent
151 Coronation	4470 Drury
153 Park Royal	4475 Hall
157 Park Royal	

*** Service address is different than mailing address

Park Royal Mutual Water Company

21 de mayo, 2021

Estimados Miembro de la Park Royal Mutual Water Company,

Esta recibiendo este aviso como miembro de Park Royal Mutual Water Company. La Junta de Control de Recursos Hídricos del Estado de California ha notificado a la Junta Directiva de Park Royal Mutual Water Company sobre una violación de la calidad del agua, Orden de Cumplimiento Número 02_18_21R_006. Se incluye una copia de la cita con esta carta. La violación es por exceder el nivel máximo de contaminante de arsénico en los pozos de Park Royal Mutual Water Company. La Junta Directiva trabajará con nuestro administrador de agua, Weeks Drilling & Pump para desarrollar el plan para evaluar el suministro de agua y las opciones de investigación para corregir el problema. En colaboración con Weeks Drilling & Pump, la Junta Directiva creará el plan de acción de reparación como se indica en la orden de cumplimiento.

Este aviso se envía electrónicamente por correo electrónico, a través de una copia impresa (USPS) y se publicará en el sitio del internet de la compañía de agua (prmwc.weebly.com). Se ha enviado una copia de este aviso a la División de Salud Pública y Salud Ambiental del Condado de Sonoma. Este aviso se publica en inglés y español.

Sinceramente,

Erin Fender

Kristen Tantarelli

Keith Roark

Junta Directiva de Park Royal Mutual Water Company

Las siguientes direcciones de servicio en el estado de California, condado de Sonoma están recibiendo este aviso:

103 Coronation	4445 Hall ***
107 Park Royal	4453 Drury
109 Coronation	4455 Hall
110 Coronation	4457 Drury
115 Coronation	4457 Regent
127 Coronation	4458 Regent
135 Park Royal	4459 Abbey
139 Coronation	4460 Crown
142 Coronation	4461 Abbey
145 Coronation	4461 Drury
149 Park Royal	4461 Regent
151 Coronation	4470 Drury
153 Park Royal	4475 Hall
157 Park Royal	

*** La dirección del servicio es diferente a la dirección postal

2 STATE OF CALIFORNIA

3 STATE WATER RESOURCES CONTROL BOARD

4 DIVISION OF DRINKING WATER

5
6 **Name of Public Water System:** Park Royal Mutual Water Company

7 **Water System No:** 4900553

8
9 **Attention:** Erin Fender, Board President

10 4660 Abbey Lane

11 Santa Rosa, CA 95401

12
13 **Issued:** May 14, 2021

14
15 **COMPLIANCE ORDER FOR NONCOMPLIANCE**

16 **CALIFORNIA HEALTH AND SAFETY CODE, SECTION 116555 AND**

17 **CALIFORNIA CODE OF REGULATIONS, TITLE 22, SECTIONS 64431**

18
19 **ARSENIC MAXIMUM CONTAMINANT LEVEL VIOLATION**

20 **FIRST QUARTER 2021**

21
22 The California Health and Safety Code (hereinafter "CHSC"), Section 116655
23 authorizes the State Water Resources Control Board (hereinafter "State Water Board"),
24 to issue a compliance order to a public water system when the State Water Board
25 determines that the public water system has violated or is violating the California Safe
26 Drinking Water Act (hereinafter "California SDWA"), (CHSC, Division 104, Part 12,
27 Chapter 4, commencing with Section 116270), or any regulation, standard, permit, or
28 order issued or adopted thereunder.

1 The State Water Board, acting by and through its Division of Drinking Water (hereinafter
2 “Division”), and the Deputy Director for the Division, hereby issues Compliance Order
3 No. 02_18_21R_006 (hereinafter “Order”), pursuant to Section 116655 of the CHSC to
4 the Park Royal Mutual Water Company (hereinafter “System”), for violation of CHSC,
5 Section 116555(a)(1) and California Code of Regulations (hereinafter “CCR”), Title 22,
6 Section 64431, Maximum Contaminant Levels (hereinafter “MCL”) – Inorganic
7 Chemicals.

8
9 **STATEMENT OF FACTS**

10 The System is classified as a community public water system with a population of 75
11 persons served through 27 service connections. The System operates under Domestic
12 Water Supply Permit No. 02-18-13P-4900553 issued by the State Water Board on
13 February 14, 2013 with one (1) amendment issued on June 12, 2015. The System is
14 using two groundwater sources to supply potable water to the distribution system.

15
16 CHSC, Section 116555(a)(1) requires all public water systems to comply with primary
17 drinking water standards as defined in CHSC, Section 116275(c). Primary drinking
18 water standards include maximum levels of contaminants, specific treatment standards,
19 and monitoring and reporting requirements as specified in regulations adopted by the
20 State Water Board.

21
22 CCR, Title 22, Section 64431 states that public water systems shall comply with the
23 primary MCLs established in Table 64431-A. The MCL for arsenic is 0.010 milligrams
24 per liter (hereinafter “mg/L”).

25
26 CCR, Title 22, Section 64432 (i) states that if any one sample would cause the running
27 annual average to exceed the MCL, the system is immediately in violation. If a system
28 takes more than one sample in a quarter, the average of all the results for that quarter

1 shall be used when calculating the running annual average. If a system fails to complete
 2 four consecutive quarters of monitoring, the running annual average shall be based on
 3 an average of the available data.

4
 5 The State Water Board received laboratory results for five arsenic samples collected on
 6 February 2, 2021 and March 3, 2021 from Well 01 (PS CODE 4900553-001). The
 7 February sample showed an arsenic concentration of 0.052 and the March samples
 8 showed an arsenic concentration of 0.068, 0.012, 0.0076, and 0.0071 mg/L. The first
 9 two results of 0.052 mg/L and 0.068 mg/L were sampled immediately after turning the
 10 well on. The remaining three samples were collected after 5, 10, and 15 minutes
 11 respectively. CCR, Title 22, Section 64432(i) defines compliance with the arsenic MCL
 12 as determined by the running annual average. The System was required to begin
 13 monitoring arsenic at Well 01 on a quarterly basis during the fourth quarter of 2020
 14 (October – December). The running annual average for arsenic at Well 01 is calculated
 15 to be 0.016 mg/L. A summary of the System’s most recent arsenic monitoring results
 16 from Well 01 is presented in Table 1 below:

Table 1 – Well 01 Arsenic Sample Results (mg/L)
(Arsenic MCL is 0.010 mg/L)

Compliance Period	Sample Date	Result	Average
2020 Quarter 3	September 09, 2020	0.011	0.011
2020 Quarter 4	November 11, 2020	0.0075	0.0075
2021 Quarter 1	February 03, 2021	0.052	0.029
2021 Quarter 1	March 03, 2021	0.068	
2021 Quarter 1	March 03, 2021	0.012	
2021 Quarter 1	March 03, 2021	0.0076	
2021 Quarter 1	March 03, 2021	0.0071	
Running Annual Average (RAA)			0.016

* If any one sample or average of monthly samples would cause the annual average to exceed the MCL, the water system is immediately in violation.

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1 The State Water Board received laboratory results for five arsenic samples collected on
 2 January 11, 2021 and March 3, 2021 from Well 02 (PS CODE 4900553-004). The
 3 January sample showed an arsenic concentration of 0.012 and the March samples
 4 showed an arsenic concentration of 0.011, 0.0097, 0.012, and 0.012 mg/L. The first two
 5 results of 0.012 mg/L and 0.011 mg/L were sampled immediately after turning the well
 6 on. The remaining three samples were collected after 5, 10, and 15 minutes of pumping,
 7 respectively. CCR, Title 22, Section 64432(i) defines compliance with the arsenic MCL
 8 as determined by the running annual average. The System was required to begin
 9 monitoring arsenic at Well 02 on a quarterly basis during the fourth quarter of 2020
 10 (October – December). The running annual average for arsenic at Well 02 is calculated
 11 to be 0.010 mg/L. A summary of the System’s most recent arsenic monitoring results
 12 from Well 02 is presented in Table 1 below:

13
 14 **Table 1 – Well 02 Arsenic Sample Results (mg/L)**
(Arsenic MCL is 0.010 mg/L)

Compliance Period	Sample Date	Result	Average
2020 Quarter 3	August 10, 2020	0.010	0.0105
2020 Quarter 3	August 26, 2020	0.011	
2020 Quarter 4	October 12, 2020	0.0091	0.0091
2021 Quarter 1	January 11, 2021	0.012	0.0113
2021 Quarter 1	March 03, 2021	0.011	
2021 Quarter 1	2021 Quarter 1	0.0097	
2021 Quarter 1	2021 Quarter 1	0.012	
2021 Quarter 1	2021 Quarter 1	0.012	
Running Annual Average (RAA)			0.010*

15 * If any one sample or average of monthly samples would cause the annual average to exceed the MCL,
 16 the water system is immediately in violation.

17
 18 Given that the current running annual average at Well 01 is 0.016 mg/L and that at
 19 minimum a non-detect result at Well 01 during the next sampling period (second quarter
 20 of 2021) would result in a running annual average of 0.012 mg/L, which exceeds the
 21 MCL, the State Water Board has determined that the System is not in compliance with

1 primary drinking water standards pursuant to CHSC, Section 116555 and the arsenic
2 MCL pursuant to CCR, Title 22, Section 64431 at Well 01.

3
4 Based on the current data Well 02 has not yet exceeded the MCL for arsenic. However,
5 given that the current RAA is 0.010 mg/L, the Division recommends that the System
6 also develop a plan to mitigate the arsenic values at Well 02.

7
8 **DETERMINATION**

9 The State Water Board has determined that the System has failed to comply with
10 primary drinking water standards pursuant to CHSC, Section 116555 and the arsenic
11 MCL pursuant to CCR, Title 22, Section 64431.

12
13 **DIRECTIVES**

14 The System is hereby directed to take the following actions:

- 15
- 16 1. By **May 14, 2022** comply with CCR, Title 22, Section 64431.
 - 17
 - 18 2. The System must continue monitoring Well 01 and Well 02 for arsenic on a
19 quarterly basis.
 - 20
 - 21 3. By **June 11, 2021** notify all persons served by the System of the violation of
22 CCR, Title 22, Section 64431, in conformance with Sections 64463.4 and 64465.
23 Appendix 1: Notification Template must be used to fulfill this directive, unless
24 otherwise approved by the State Water Board. **The System must edit the**
25 **wording of the public notice as necessary.** The public notice must be
26 completed in accordance with the following:
 - 27 • By mail or direct delivery of the public notice to each customer served by the
28 water system and;

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- By one of the following secondary methods to reach persons not likely to be reached by mail or direct delivery;
 - By publication in a local newspaper, by delivery to community organizations or by posting in conspicuous public places served by the water system or on the internet. If the water system opts to issue the notice via internet website, the public notice must remain posted for a minimum of seven (7) consecutive days.

- 4. By **June 11, 2021**, complete Appendix 2: Certification of Completion of Public Notification Form. Submit it together with a copy of the public notice required by Directive 2 to the State Water Board within 10 days following each public notification.

- 5. Prepare a Corrective Action Plan for State Water Board approval, identifying improvements to the water system designed to correct the arsenic MCL exceedance and ensure that the System delivers water to consumers that meets primary drinking water standards. The plan must include a time schedule for completion of each of the phases of the project, such as design, construction, and startup, and a date as of which the System will be in compliance with the arsenic MCL, which date must be no later than **May 14, 2022**.

- 6. By **August 13, 2021**, submit the Corrective Action Plan required under Directive No. 4 above electronically to the State Water Board at dwpdist18@waterboards.ca.gov.

- 7. Carry out the State Water Board-approved Corrective Action Plan, and each element of said plan, according to the time schedule set forth therein.

1 8. By **June 10, 2022** demonstrate to the State Water Board that the water delivered
2 by the System complies with the arsenic MCL.
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4
5 9. By **June 11, 2021** complete and return to the State Water Board the “Notification
6 of Receipt” form attached to this Order as Appendix 4. Completion of this form
7 confirms that the System has received this Order and understands that it
8 contains legally enforceable directives with due dates.
9

10 All submittals required by this Order, unless otherwise specified in the directives above,
11 must be electronically submitted to the State Water Board at the following address. The
12 subject line for all electronic submittals corresponding to this Order must include the
13 following information: Water System name and number, Order number and title of the
14 document being submitted.
15

16 Janice M. Oakley, P.E., Sonoma District Engineer
17 Dwpdist18@waterboards.ca.gov
18

19 The State Water Board reserves the right to make modifications to this Order as it may
20 deem necessary to protect public health and safety. Such modifications may be issued
21 as amendments to this Order and shall be effective upon issuance.
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23 Nothing in this Order relieves the System of its obligation to meet the requirements of
24 the California SDWA (CHSC, Division 104, Part 12, Chapter 4, commencing with
25 Section 116270), or any regulation, standard, permit or order issued or adopted
26 thereunder.
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PARTIES BOUND

This Order shall apply to and be binding upon the System, its owners, shareholders, officers, directors, agents, employees, contractors, successors, and assignees.

SEVERABILITY

The directives of this Order are severable, and the System must comply with each and every provision thereof notwithstanding the effectiveness of any provision.

FURTHER ENFORCEMENT ACTION

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The California SDWA authorizes the State Water Board to: issue a citation or order with assessment of administrative penalties to a public water system for violation or continued violation of the requirements of the California SDWA or any regulation, permit, standard, citation, or order issued or adopted thereunder including, but not limited to, failure to correct a violation identified in a citation or compliance order. The California SDWA also authorizes the State Water Board to take action to suspend or revoke a permit that has been issued to a public water system if the public water system has violated applicable law or regulations or has failed to comply with an order of the State Water Board, and to petition the superior court to take various enforcement measures against a public water system that has failed to comply with an order of the State Water Board. The State Water Board does not waive any further enforcement action by issuance of this Order.

Stefan Cajina, P.E., Chief
North Coastal Section
State Water Resources Control Board
Division of Drinking Water

May 14, 2021
Date

Appendices (3):

- 1. Notification Template
- 2. Certification of Completion of Public Notification
- 3. Notification of Receipt

Certified Mail No. 7017 3040 0000 9798 1136