



WATER SYSTEMS - OFFICIAL INSPECTION REPORT

FACILITY NAME CADIZ INC				REINSPECTION DATE Next Routine	INSPECTOR Belinda Huy	DATE 1/30/2018
LOCATION 96726 E HWY 66, CADIZ, CA 92304				PERMIT EXPIRATION 5/31/2016	IDENTIFIER: None	
TIME IN 10:28 AM	TIME OUT 11:39 AM	FACILITY ID FA0003199	RELATED ID 3601070	PE 4635	SERVICE: 001 - INSPECTION - ROUTINE RESULT: 03 - CORRECTIVE ACTION / NO FOLLOW UP RE ACTION: 01 - NO FURTHER ACTION REQUIRED	

WATER SYSTEMS - Transient-noncommunity Sys - Tier 1 Sgl Well

Based on an inspection this day, the items marked below identify the violation(s) in operation or facilities which must be corrected. Failure to correct listed violation(s) prior to the designated compliance date may necessitate an additional inspection to be billed at the hourly rate as provided in the San Bernardino County Code, [Schedule of Fees](#).

Administrative Order to Show Cause (OSC): The Permittee has the right to a hearing if requested in writing within 15 calendar days of receipt of this notice, to show cause why the permit to operate should not be suspended or revoked; otherwise the right to a hearing shall be deemed waived.

Introduction

Cadiz Inc. (hereinafter "Water System") is a public water system classified as a transient system as defined by the California Health and Safety Code Section 116275 (o). The Water System has one service connection: a labor camp consisting of 12 trailers and a kitchen. During harvesting season, the labor camp is occupied by transient farm workers. For the past year, the Water System has not been occupied as new crops were replanted and are not yet producing. The Water System is currently in the process of replacing old leaky water mains and plans on refitting the 12 trailers as well. The Water System is required to notify the Division of Environmental Health Services (DEHS) and submit a Seasonal System Shutdown Notification and Start-Up Certification Form when the system temporarily halts activity as well as prior to returning to usual operations.

The 2018 Sanitary Survey was conducted with Lesley Thornburg, the manager.

Management

The Water System is maintained and managed by Lesley Thornburg. There is no designated certified operator and is not required for transient water systems.

An outdated Emergency Notification Form (2000) and Emergency Response Plan (2000) are on file with DEHS.

A Bacteriological Sample Siting Plan (2017) is on file.

Distribution

Water flows from the Labor Camp Well and into two polyethylene storage tanks. Two booster pumps will then supply water to the 12 trailers and kitchen through one-inch steel pipes and six bladder tanks provide pressure to the distribution system at approximately 45-pounds per square inch (psi) of pressure. Replacement water mains shall meet Title 22 California Code of Regulations 64570 standards.

There are no known backflow prevention devices installed for this facility. If backflow devices are installed, all devices shall be tested at least annually pursuant to Title 22 California Code of Regulations Section 7605 (c).

Sources



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The source of supply is a single vertical well, the Labor Camp Well (permit number: 04148604), drilled in 1986 to a finished depth of 400-feet. The source is surface sealed and has a 70-foot annular seal. The well is equipped with a submersible pump producing 20-gallons per minute (gpm) and is constructed according to the California Well Standards Bulletin 74-81 and 74-90; the well head terminates a minimum of 18-inches above the finished grade. A sampling tap is installed at the well head but a flow meter was not observed at the time of inspection. This source is housed in its own individual outbuilding but is unsecured from access by unauthorized persons and from tampering, vandalism, or other threats. A Well Permit and Water Well Drillers Report are on file with DEHS.

An additional source, the Dormitory Well, located on the facility was observed at the time of inspection. This well serves a lavatory with toilets and showers adjacent to a dormitory building. Potable water is not supplied to the dormitory building. During one month of the year for pruning efforts, the lavatory serves approximately 15 transient farm workers. This source is not regulated by DEHS based on the duration and number of people served. DEHS does not have any information regarding this source. The Water System must notify DEHS if this source serves more than 25 people per day at least 60 days per year.

A Drinking Water Source Assessment and Protection (DWSAP) Program was not completed. The Water System may contact Cian Reger of the California Rural Water Association for assistance in completing a DWSAP Program at 626-722-7490 or at creger@calruralwater.org.

Storage

The Water System has two 3,800-gallon polyethylene storage tanks approximately 10-feet in height and six 26.0-gallon pressure tanks. The storage tanks appear to be in good condition. The east storage tank is equipped with an extended and screen overflow device and a tank base support. The west storage tank is equipped with a screened overflow outlet with no extension device and a tank base support. At the time of inspection, there was no attached ladder. The pressure tanks and storage tanks are enclosed in a chain link enclosure not adequately secured.

Pumps

There are two booster pumps, one 15-horsepower (hp) and one five-hp, installed for this facility. The booster pumps are located by the Labor Camp Well.

Treatment

The water is not treated at this facility.

Water Quality

Cadiz Inc. has submitted water analysis results for general mineral and general physical constituents, inorganic chemicals, volatile organic compounds (VOCs), synthetic organic chemicals (SOCs), radiological constituents, lead and copper, and total coliform bacteria. The Water System adheres to the sample requirements for a transient water system set forth by Title 22 California Code of Regulations. During normal operating seasons, the Water System shall monitor the water quarterly at a minimum for total coliform bacteria or as required by DEHS. The water shall also be analyzed for nitrate annually and nitrite once every three years.

In the past year, total coliform bacteria was not collected and analyzed from the groundwater source during the third quarter of 2017. Citation number 05_66_18C_01_3601070_23 was issued and the Water System returned to compliance on 01/09/18.

Water samples are analyzed by Eurofins Eaton Analytical, Inc. laboratory under the client identification name "West Yost Labor Camp."

Appraisal

The system is in need of many repairs. At the time of inspection, the Labor Camp Well lacked a flow meter and a vent at the well head was not properly protected from entry of foreign matter. Additionally, the well site was not sufficiently secured from access by unauthorized persons and from tampering, vandalism, or other threats. Water mains were reported to be deteriorating per the manager.

See the following pages for the code sections and general requirements that correspond to each violation listed below.



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46K980 Inspection - Eight (8) Elements

Compliance Date: Not Specified

Not In Compliance

Reference -

Inspector Comments: Six of the eight sanitary elements were found to be non-deficient at the time of inspection. The source and the system's monitoring, reporting, and data verification were deficient.

Description: All eight sanitary elements which include the source, treatment, distribution system, finished water storage, pump; their facilities and controls, system management and operation, operator certification, cross connection controls, and the system's monitoring, reporting, and data verification were surveyed during this inspection.

46W110 Source - Flow Meter

Comply by: 6/30/2018

Not In Compliance

Reference - CCR 22 - 64561(a)

Inspector Comments: Observed missing flow meter at the Labor Camp Well well head. Install a flow meter at a location between each water source and the entry point to the distribution system, submit photos as proof of compliance on or before June 30, 2018.

Title 22 California Code of Regulations Section 64561 (a): except for inactive sources, each water system shall install a flow meter at a location between each water source and the entry point to the distribution system and (b) Meter the quantity of water flow from each source, and record the total monthly production each month.

Description: Each source shall be equipped with a flow meter and totalizer, located between the source and entry point to the distribution/storage system, to record total source production monthly. The flow meter shall be maintained in good repair.

46W130 Source - Well Head Casing Vent

Comply by: 3/31/2018

Not In Compliance

Reference - CCR 22 - 64576

Inspector Comments: Observed vent at well head improperly protected from foreign matter. Seal and protect opening and submit photos as proof of compliance on or before March 31, 2018.

California Well Standards Bulletin 74-81 and 74-90, Part II., Section 10 (A): openings (holes, crevices, cracks, etc.) shall be sealed and protected against entrance of surface waters or foreign matter.

Description: The well head shall be equipped with down turned screened casing vent to prevent a partial vacuum during pumping allowing contaminants to enter the well.

46W140 Source - Well Head Security

Comply by: 3/31/2018

Not In Compliance

Reference - CCR 22 - 64560(a)(2)

Inspector Comments: Properly secure outbuilding for the Labor Camp Well in addition to the chain link enclosure encompassing the well site, storage and pressure tanks, and booster pumps, to protect access from unauthorized persons and from vandalism, tampering, or other threats. Submit photos as proof of compliance on or before March 31, 2018.

Title 22 California Code of Regulations Section 64560 (a)(2): the water system shall provide documentation demonstrating that a well site control zone with a 50-foot radius around the site can be established for protecting the source from vandalism, tampering, or other threats at the site by water system ownership, easement, zoning, lease, or an alternative approach approved by the State Board based on its potential effectiveness in providing protection of the source from contamination.

Section 64585 (b)(7): each distribution reservoir shall be equipped to prevent access by unauthorized persons.

Description: The well head shall be enclosed in a structure or fenced area that prevents unauthorized access.

46W320 Distribution System - Exercise Valves

Compliance Date: Not Specified

Not In Compliance

Reference - CCR 22 - 64600

Inspector Comments: It is recommended that valves be exercised at least annually unless they have not been exercised for an extended time. In such cases, replacement valves should be readily available in the event the valve needs to be operated and fails.

Additionally, ensure replacement water mains meet Title 22 California Code of Regulations Section 64570 standards. Prior to installation, submit proof of compliance to DEHS in the form of product descriptions or receipts. Section 64570 was emailed to the manager.

Title 22 California Code of Regulations Section 64570: (a) All newly installed water mains shall comply with the materials and installation standards of the American Water Works Association pursuant to tables 64570-A and 64570-B. (b) Water mains shall:

- (1) Be installed below the frost line or be otherwise protected to prevent freezing; and
- (2) Be protected against crushing under loads that could pass above the installation.

Description: It is recommended that valves be exercised at least annually unless they have not been exercised for an extended time. In such cases, replacement valves should be readily available in the event the valve needs to be operated and fails.



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46W610 Monitoring, Reporting and Data Verification - EDT Upload

Comply by: 3/31/2018

Not In Compliance

Reference - CCR 22 - 64469

Inspector Comments: Instruct the laboratory to upload all chemical data via electronic data transfer (EDT) using the following primary station (PS) codes. Submit a signed and completed EDT Authorization Form on or before March 31, 2018. Form emailed to the manager.

Labor Camp Well – PS code: 3601070-001

Title 22 California Code of Regulations Section 64469 (a) and (c): Analytical results of all sample analyses completed in a calendar month shall be reported no later than the tenth day of the following month and shall be reported electronically.

Description: All chemical water sample results shall be submitted via EDT by the 10th day of the following month.

46W812 Operator Compliance with State Requirements - Emergency Notification Plan

Comply by: 3/31/2018

Not In Compliance

Reference - HSC - 116460

Inspector Comments: An Emergency Notification Form (ENF) and an Emergency Response Plan (ERP) need to be updated. Submit an updated ENF and ERP to DEHS to assist in monitoring possible events that may cause water service disruptions. Emailed templates to the manager. Complete and submit to DEHS on or before March 31, 2018.

Section 116460 of the California Health and Safety Code requires a copy of the current emergency notification plan. No person shall operate a public water system without an emergency notification plan that has been submitted to and approved by the department. The emergency notification plan shall provide for immediate notice to the customers of the public water system of any significant rise in the bacterial count of water or other failure to comply with any primary drinking water standard that represents an imminent danger to the health of the water users. No permit, variance, or exemption may be issued or amended under this chapter until an emergency notification plan has been approved by the department.

Description: The water system shall have a current Emergency Notification Plan(ENP) on file with DEHS. The plan shall be updated annually.

46W816 Operator Compliance with State Requirements - Seasonal Water Systems

Comply by: 3/31/2018

Not In Compliance

Reference - CCR 22 - 64600

Inspector Comments: Submit a Seasonal System Shutdown Notification and Start-Up Certification Form on or before March 31, 2018. Ensure a Seasonal Certification Form is submitted to DEHS when the system temporarily halts activity as well as prior to returning to usual operations. Form emailed to manager.

Description: The water system operates seasonally and shall have written procedures for the start-up (including disinfection) and shut-down of the system.

Overall Inspection Comments



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On going:

During normal operating seasons, continue to analyze the water on a quarterly basis at a minimum for total coliform bacteria from the distribution system (last analysis: 12/06/17), nitrate as nitrogen (NO₃-N) from the groundwater source (last analysis: 06/22/17), and nitrite as nitrogen (NO₂-N) from each groundwater source (last analysis: 06/22/17).

Instruct an Environmental Laboratory Accreditation Program (ELAP)-accredited laboratory to upload all chemical analyses results via electronic data transfer (EDT) using the following primary station (PS) codes:

Labor Camp Well - PS code = 3601070-001

Additionally, instruct the laboratory to submit all laboratory reports to the DEHS drinking water email account at sbcwater123@gmail.com

The Electronic Annual Report (EAR) is due on an annual basis by April 1st online at the DRINC Portal, which may be found at the following website link: <http://drinc.ca.gov/ear/>

The DDW has extended the 2017 EAR due date to June 1, 2018.

Title 22 California Code of Regulations Section 7584: the water supplier shall protect the public water supply from contamination by implementation of a cross-connection control program.

Title 22 of the California Code of Regulations Section 64561 (a): except for inactive sources, each water system shall install a flow meter at a location between each water source and the entry point to the distribution system and (b) Meter the quantity of water flow from each source, and record the total monthly production each month.

FAILURE TO COMPLY WITH THE ESTABLISHED DEADLINES WILL RESULT IN A CITATION WITH FINANCIAL PENALTY.

Total # of Images: 0