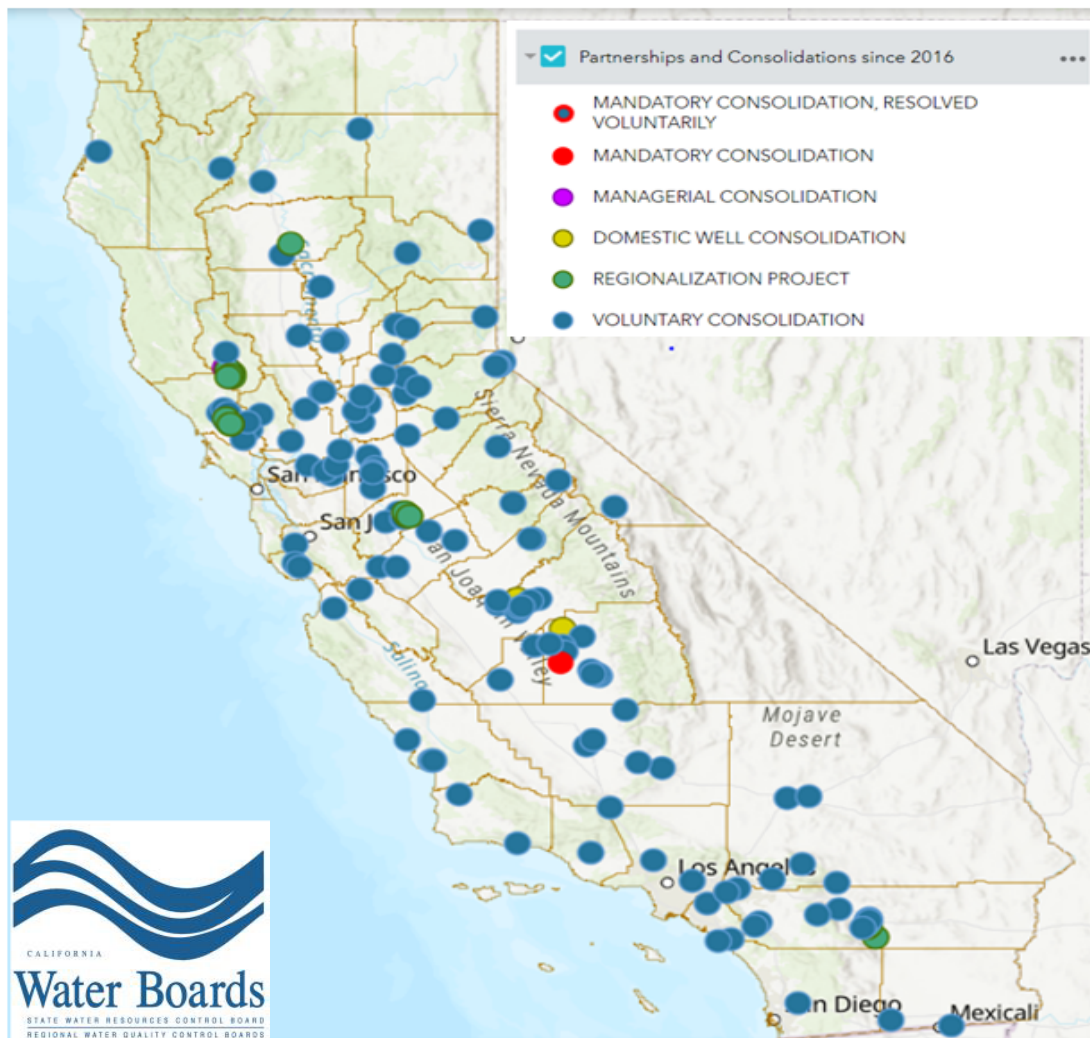


STATE OF CALIFORNIA

ANNUAL COMPLIANCE REPORT 2020



Consolidation Project:
Double L Mobile Ranch Park,
City of Kerman, County of
Fresno.
Funding awarded to the City in
2016. This water system was
tied into the city's distribution
system and began to receive
city water in 2020.



COVER PHOTO: Water Partnership Success Stories

On September 12, 2012, Governor Edmund G. Brown Jr. signed Assembly Bill (AB) 685, making California the first state in the nation to legislatively recognize the human right to water. The Division of Drinking Water maintains the [Human Right to Water Portal](#) providing a snapshot of HR2W statuses for all systems in California.



In an effort to improve access to clean, reliable, and affordable water supplies for communities, the State Water Resources Control Board has redoubled its efforts to support water partnerships, consolidations and regional projects. California has about 7,400 public water systems, of which approximately 90 percent serve less than 1,000 connections. Small public water systems are often less resilient to natural disasters, such as drought and fire, have more difficulty adjusting to regulatory changes, and may struggle to fund infrastructure maintenance and replacement due to poor economies of scale and lack of staff. As a result, the State Water Resources Control Board (State Water Board) supports water partnerships whenever feasible, a component of the new Safe and Affordable Fund for Equity and Resilience (SAFER) program. Water partnerships can take many forms, including local resource sharing, physical consolidation, managerial consolidation, and full regionalization. For more information please check our [SAFER Engagement website](#).

Message from the Drinking Water Program Manager

The Division of Drinking Water (DDW) is pleased to present the 2020 Annual Compliance Report, which summarizes the state of compliance of California's public water systems with the federal Safe Drinking Water Act (SDWA) as well as California's SDWA, for calendar year 2020.

How to get information on the compliance status of California public water systems:

2020 Annual Compliance Report: A copy of this report and the associated data tables will be available to the public by contacting DDW at (916) 449-5577, or through the State Water Board website at:

https://www.waterboards.ca.gov/drinking_water/certlic/drinkingwater/Publications.html

Human Right to Water Portal: DDW maintains a public webpage on the compliance status of public water systems, as part of its implementation of the State Water Board's resolution on the human right to water

https://www.waterboards.ca.gov/water_issues/programs/hr2w/

Drinking Water Watch: DDW maintains a public webpage on the inventory of public water systems, including violations and enforcement actions, at:

<https://sdwis.waterboards.ca.gov/PDWW/>



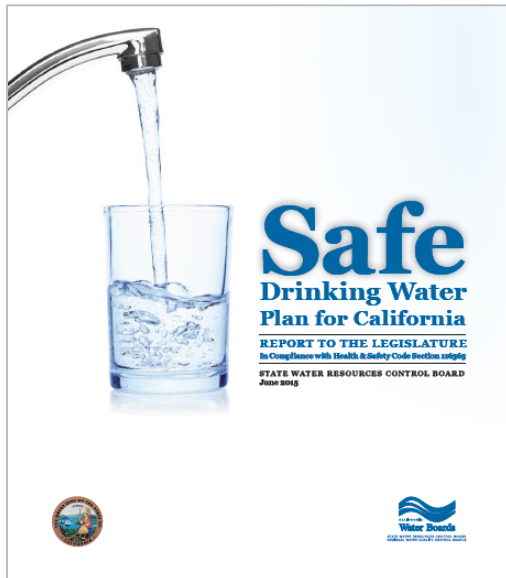
Darrin Polhemus

*Deputy Director, Division of Drinking Water
State Water Resources Control Board*

The violations data for 2020 shows that 97% of public water systems, serving more than 99% of Californians, complied with maximum contaminant levels (MCLs) and treatment techniques (TT) contained in federal rules established under the SDWA.

Our records show that 248 public water systems (PWS), out of a total of 7,367 active public water systems, had one or more violations of an MCL or TT in 2020. Of these, over 92% are the smaller public water systems - including noncommunity water systems and community water systems having less than 500 service connections. DDW takes appropriate progressive enforcement to ensure that these public

water systems are on a path to compliance with the SDWA.



The State Water Board, through programs such as the Drinking Water State Revolving Fund, the Safe and Affordable Drinking Water Fund, and funding from state bonds, helps to provide financing through loans or grants for planning or construction projects to address water quality problems to provide an adequate and affordable supply of safe drinking water.

In 2016, DDW gained authority to mandate water system consolidation as a strategy to reduce the number of PWS that are consistently unable to provide safe drinking water. Fifteen (15) PWS are currently in the process of mandatory consolidation, with nine of

these electing to do so voluntarily. For more information about the status of consolidation projects, please visit our website

https://www.waterboards.ca.gov/drinking_water/programs/compliance/index.html

DDW provides assistance and resources to PWS to help ensure that they maintain long-term sustainability and capacity to maintain compliance with drinking water laws and regulations. Information about DDW's technical, managerial, and financial capacity development program, is available at our website

https://www.waterboards.ca.gov/drinking_water/certlic/drinkingwater/TMF.html.

DDW is working on updating the Safe Drinking Water Plan for California, which provides the State Water Board's strategy for ensuring that all Californians have access to safe affordable drinking water. For more information about the Safe Drinking Water Plan, please visit our website https://www.waterboards.ca.gov/drinking_water/safedrinkingwaterplan/.

DDW continues to work with all public water systems to ensure that they achieve compliance with the SDWA and provide water that is pure, wholesome and potable to their customers.

Executive Summary

The State Water Resources Control Board (State Water Board) Division of Drinking Water (DDW) is the primacy agency responsible for the administration and enforcement of the federal Safe Drinking Water Act (SDWA) requirements in California. The State Water Board has adopted statutes and regulations to implement the requirements of the SDWA. The State Water Boards' regulatory responsibility over public water systems includes (1) issuance of operating permits, (2) conducting inspections and sanitary surveys, (3) monitoring for compliance with regulations, and (4) taking enforcement action to compel compliance when violations are identified.

Throughout the year and as part of DDW's regulatory oversight responsibilities, Drinking Water Program staff from DDW's 24 District offices and 29 County health departments (delegated by the State Water Board to undertake regulatory oversight on behalf of DDW) document and record violations incurred by public water systems. Enforcement actions are issued by the Drinking Water Program to address these violations. The data is compiled and submitted to the United States Environmental Protection Agency (USEPA) on a quarterly basis.

This report presents an accounting of the violations record for the calendar year 2020. USEPA requires states to issue this Annual Compliance Report by July 1st of each year and make the report available to the public. USEPA requires that the Annual Compliance Report summarize the compliance status for the following rules from the National Primary Drinking Water Regulations:

- Chemical (Phase II/V) Rule:
 - Inorganic contaminants (IOC)
 - Synthetic organics (SOC)
 - Volatile organics (VOC)
- Radionuclide Rule (RAD)
- Total Coliform Rules (RTCR)
 - Total Coliform Rule (TCR)
 - Revised TCR (rTCR)
- Disinfectants and Disinfection By-Products Rule (DBPR)
 - Stage 1 DBPR
 - Stage 2 DBPR
- Surface Water Treatment Rules (SWTR)
 - Surface Water Treatment Rule
 - Filter Backwash Rule (FBR)
 - Interim Enhanced SWTR (IESWTR)
 - Long Term 1 Enhanced SWTR (LT1)
 - Long Term 2 Enhanced SWTR (LT2)
- Groundwater Rule (GWR)
- Lead and Copper Rule (LCR)
- Public Notification Rule (PN)
- Consumer Confidence Report Rule (CCR)
- Variances and exemptions (V/E)

The following types of violations are included in this report:

- ✓ Maximum contaminant level (MCL) violations
- ✓ Maximum residual disinfectant level (MRDL) violations
- ✓ Treatment technique requirement (TT) violations
- ✓ Significant monitoring and/or reporting requirements (M/R) violations
- ✓ Variances and exemption violations
- ✓ Recordkeeping violations
- ✓ Significant public notification requirement violations
- ✓ Significant consumer confidence report (CCR) notification violations

This report also presents an account of violations of state-regulated chemicals and other state SDWA requirements that are recorded by DDW; these are summarized separately in the report as required by USEPA guidelines. The discussion, figures and summaries provided herein refer to the National Primary Drinking Water Regulations unless stated otherwise.

In 2020, a total of 1,590 violations of the National Primary Drinking Water Regulations were incurred by public water systems. Of these violations, 812 were MCL/TT violations and 778 were M/R violations. Figure ES-1 summarizes the number of violations recorded in 2020 per rule.

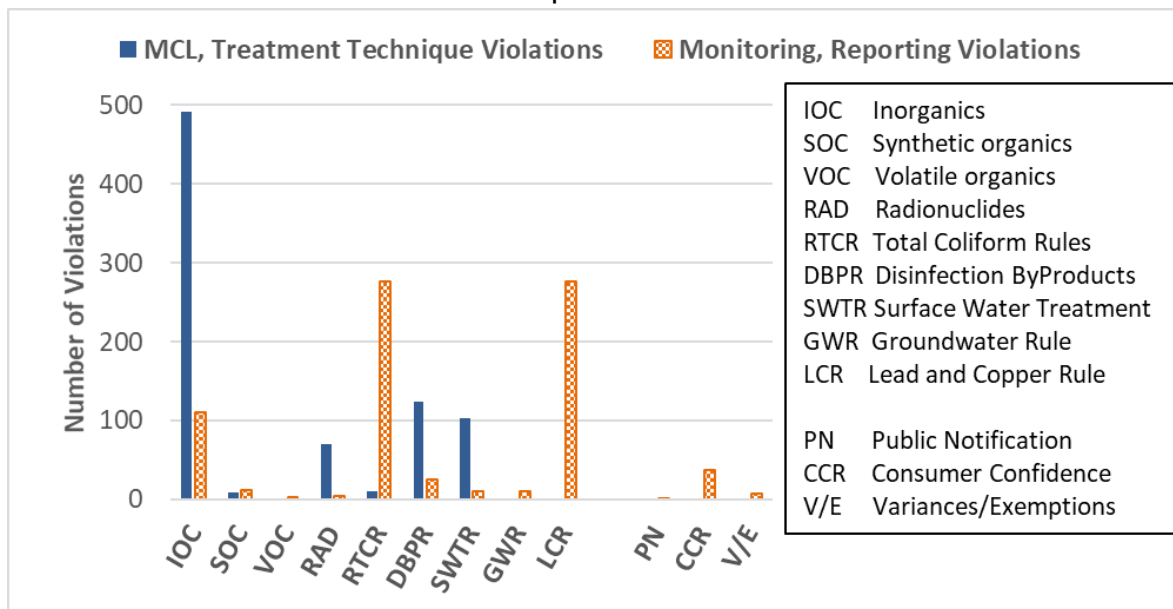


Figure ES-1 Federal Violations Incurred by Public Water Systems in 2020

PWS incurred the largest number of MCL/TT violations for inorganic contaminants (nitrate and arsenic were the major ones), followed by violations of standards for Disinfection Byproduct Rules, Surface Water Treatment Rule and Radionuclides. They incurred the largest number of monitoring/reporting violations for the Total Coliform Rule and Lead and Copper Rule.

Figure ES-2 below summarizes the number of PWS that incurred violations of each rule for federal drinking water standards in 2020. Please note that a PWS may have incurred violations of more than one rule.

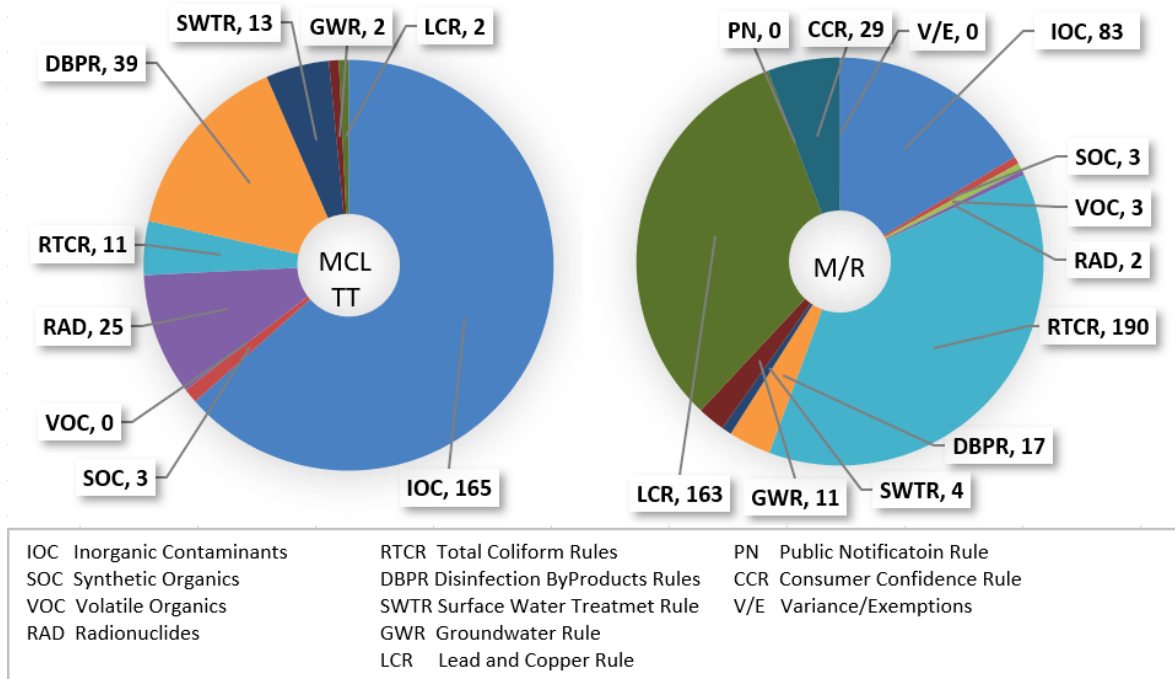


Figure ES-2 Number of public water systems with federal violations in 2020 of the MCL or treatment technique (left), and of the monitoring or reporting requirements (right)

Figure ES-3 shows the classification and sizes of PWS (as represented by the number of service connections) that incurred one or more MCL/TT violations in 2020. Community water systems (CWS) that incurred at least one MCL/TT violation in 2020 represented about 5% of the total number of active CWS in the state. About 92% of the MCL/TT violations were incurred by CWS that serve fewer than 500 service connections, nontransient noncommunity water systems (NTNC) such as schools, or transient noncommunity water systems (TNC) such as campgrounds.

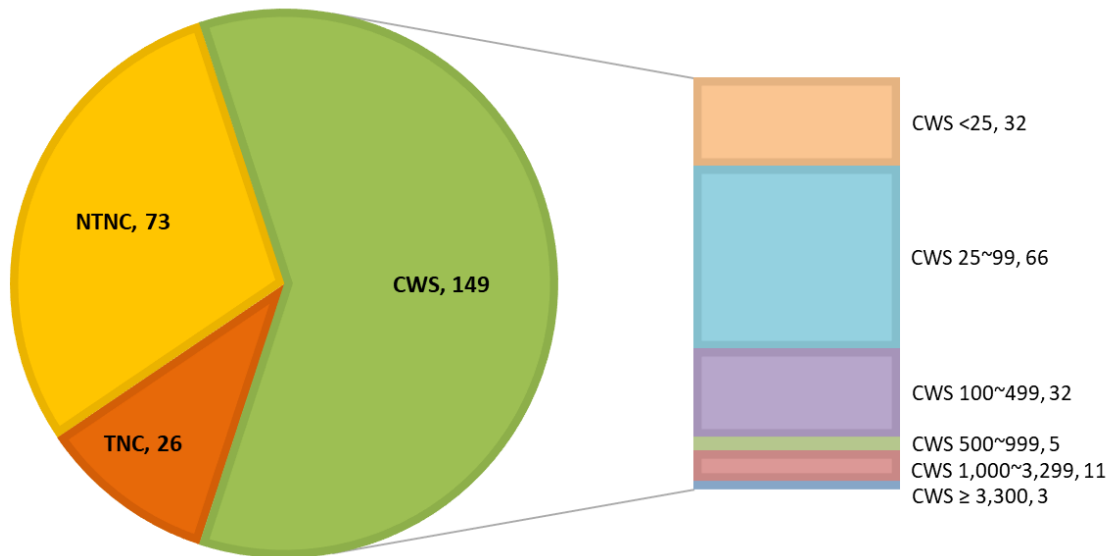


Figure ES-3 Number of PWS by classification and size (as service connections) with MCL or TT violations in 2020. CWS = Community Water System; TNC = Transient Noncommunity Water System; NTNC = Nontransient Noncommunity Water System. See Section 1.3 for definitions of these different types of public water systems.

Table ES-1 summarizes the number of MCL and TT violations of the federal SDWA that have been documented and reported for calendar year 2020 and compares the 2020 numbers with the previous year's numbers. An estimate of the population served by PWS that failed an MCL or TT standard in 2020 is provided, based on the total estimated population-served reported by PWS. Please note that the population estimates of water systems is not intended to represent the number of people impacted by the violation since some violations may impact only a portion of a very large system.

Table ES-1 Violations of Maximum Contaminant Levels (MCLs) or Treatment Techniques (TT), Comparison between 2019 and 2020

Category	Year 2019 MCL/TT Violations	Year 2019 Estimated Population	Year 2020 MCL/TT Violations	Year 2020 Estimated Population	Change in Number of Violations
Inorganic Contaminants	656	99,770	491	59,965	-165
Synthetic Organic Contaminants	5	530	9	630	4
Volatile Organic Contaminants	0	0	0	0	0
Radionuclide Rule	117	14,621	70	9,121	-47
Revised Total Coliform Rule	48	24,927	11	2,000	-37
Disinfection By-Products Rule	149	137,569	124	138,711	-25
Surface Water Treatment Rules	136	9,049	103	1,229	-33
Groundwater Rule	7	259,791	2	769	-5
Lead and Copper Rule	8	9,857	2	350	-6
Totals (a)	1,126	547,361	812	201,487	-314

(a) The total estimated population is less than the sum of the populations for each violation category, since a PWS may have one or more violations in one or more violation category

Table ES-2 below summarizes the number of violations of the federal SDWA rules for other violation reporting categories for calendar year 2020, including violations of public notification and Consumer Confidence Report (CCR) requirements, the number of public water systems that incurred the violation, as well as a comparison to the previous year's numbers.

Table ES-2 Other Violation Reporting Categories

Violation Category	<u>Year 2019</u> Number of Violations	Year 2019 Number of PWS	<u>Year 2020</u> Number of Violations	Year 2020 Number of PWS	Change in Number of Violations
Public Notification Rule	9	5	1	1	-8
Consumer Confidence Report Notification	74	61	38	29	-36
Variations and Exemptions	0	0	7	4	7

Table ES-3 below summarizes the number of MCL violations of California-specific regulated chemicals, and the estimated population served by the PWS incurring the violations. California initiated implementation of the MCL for 1,2,3-trichloropropane (123TCP) in 2018, and PWS began to conduct initial quarterly monitoring. The large number of SOC MCL violations shown in Table ES-3 was due to implementation of the 123TCP state drinking water standard.

California’s Total Coliform Rule (TCR) regulations had not yet been updated to reflect the federal Revised Total Coliform Rule (rTCR) in 2020, so the Drinking Water Program staff are tracking violations for both the rTCR and TCR. The summary of violations of the rTCR is presented in Table ES-1, and the violations of California’s TCR Total Coliform MCL (non-acute) is presented in Table ES-3 below. The number of TCR Total Coliform MCL violations for 2020 is fewer than those incurred by PWS in previous years.

Table ES-3 Violations of California-specific Maimum Contaminant Levels (MCL) and Treatment Techniques (TT)

MCL Violation Category	Year 2019 MCL & TT Violations	Year 2019 Estimated Population	Year 2020 MCL & TT Violations	Year 2020 Estimated Population	Change in Number of Violations
Primary Inorganic Contaminants	8	231	4	200	-4
Synthetic Organic Contaminants (SOCs)	452 (b)	494,261	301 (b)	366,880	-151
Volatile Organic Contaminants (VOCs)	0	0	0	0	0
Secondary Standards	22	1,081	25	6,139	3
CA Total Coliform Rule (TCR) – Total Coliform MCL	315	408,241	102	54,055	-213
Totals (a)	797	902,935	432	426,470	-365

(b) The total estimated population is less than the sum of the populations of each violation category, since a PWS may have violations in more than one category.

(c) Due to violations of 1,2,3-trichloropropane (123TCP) MCL. See Section 3.13.

In 2020, the Drinking Water Program issued approximately 1,900 enforcement actions to public water systems for failing to comply with either federal or state drinking water regulations. An enforcement action addresses one or more violations, and prescribes public notification requirements as necessary, corrective actions, and deadlines that the public water system must meet in order to be considered “returned to compliance” (RTC).

Figure ES-4 shows the number of public water systems that have returned to compliance for a federal rule for each water system category/size, compared with the number of public water systems that had incurred one or more MCL/TT violations in 2020. The systems that had an RTC during 2020 may have had the initial violation in 2019 or in prior years. Public water systems are required to provide routine (typically quarterly) public notification of MCL/TT violations that are on-going and are not resolved.

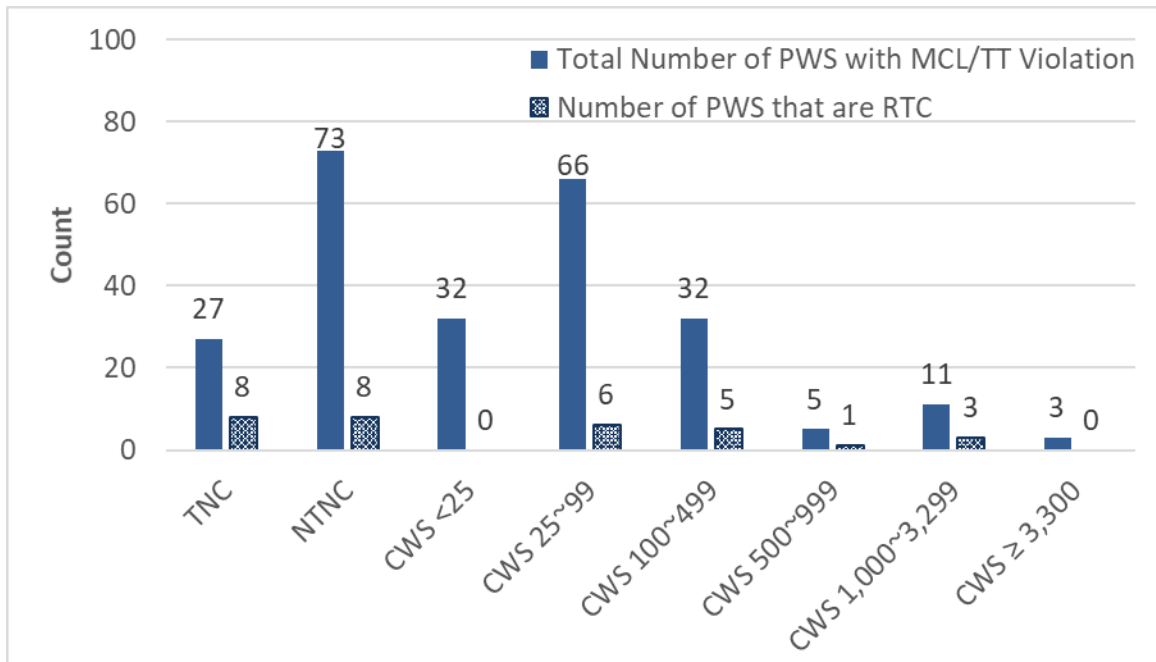


Figure ES-4 Number of public water systems that have returned to compliance for an MCL/TT violation incurred in 2020. PWS are categorized by type/CWS size (number of service connections)

Overall, 12% (down from 20% last year) of public water systems have returned to compliance for an MCL or TT violation incurred in 2020 or in prior years. DDW continues to monitor the compliance status of public water systems, working to identify and track public water systems that do not meet drinking water standards and provide technical assistance as well as take appropriate and effective enforcement measures and other addressing actions, to ensure that these public water systems are working towards a path of compliance with the SDWA.

This report also includes data on violations of the California SDWA for calendar year 2020, which includes the regulation of several chemicals such as perchlorate and 123TCP, as well as other state requirements such as certification of distribution system and treatment operators, which are not included in federal regulations. Violations of state drinking water standards are discussed and accounted for separately in Section 3.4 and 3.5.

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Chapter 1. Overview of the Drinking Water Program

1.1. Federal Program

The USEPA established the Public Water System Supervision (PWS) Program under the authority of the 1974 Safe Drinking Water Act (SDWA). Under the SDWA and the 1986 Amendments, USEPA sets national limits on contaminant levels in drinking water to ensure that the water is safe for human consumption. These limits are known as Maximum Contaminant Levels (MCLs) and Maximum Residual Disinfectant Levels (MRDLs). For some regulations, USEPA establishes Treatment Techniques (TT) in lieu of an MCL to control unacceptable levels of contaminants in water. The USEPA also regulates how often public water systems (PWS) monitor their water for contaminants and report the monitoring results to the states or USEPA. Generally, the larger the population served by a water system, the more extensive and frequent are the monitoring and reporting (M/R) requirements. In addition, USEPA requires selected community and nontransient noncommunity water systems to monitor for unregulated contaminants to provide data for future regulatory development. Finally, USEPA requires PWS to notify their consumers when they have violated these regulations. The 1996 Amendments to the SDWA among other things require consumer notification to include a clear and understandable explanation of the nature of the violation, its potential adverse health effects, steps that the PWS is undertaking to correct the violation and the possibility of alternative water supplies during the violation.



The SDWA allows states, tribes and territories to seek USEPA approval to administer their own PWS Supervision Programs. The authority to run a PWS Supervision Program is called **primacy**. For a state to receive primacy, USEPA must determine that the state meets certain requirements laid out in the SDWA and the federal regulations, including the adoption of drinking water regulations that are at least as stringent as the federal regulations and a demonstration that they can enforce the program requirements.

1.2. California Program

California's Drinking Water Program was created in 1915, when the California Bureau of Sanitary Engineering was established by the California State Board of Health. The bureau's primary duty at that time was to prevent and eliminate water-borne diseases.

Two years after the 1974 federal SDWA was passed, the state adopted the California Safe Drinking Water Act. The state's SDWA has two main goals: to continue the state's Drinking Water Program, and to be delegated primacy by USEPA with authority for enforcement of the federal SDWA. California was first granted primacy for implementation of the federal SDWA on June 2, 1978.

The Drinking Water Program was transferred in its entirety from the California Department of Public Health to the State Water Resources Control Board (State Water Board) on July 1, 2014. The State Water Board Division of Drinking Water (DDW) oversees implementation of the SDWA over public water systems within California. The State Water Board has further delegated regulatory authority through a delegation agreement with County Environmental Health Departments. Currently, 29 counties in California have retained primacy as a Local Primacy Agency (LPA) under delegation agreements issued and signed in 2014 and amended in 2017. These LPAs oversee SDWA compliance of small PWS that serve fewer than 200 service connections within their county jurisdictions.

Figure 1 shows the geographic distribution of DDW's 24 District Offices under the Field Operations Branch located throughout the state that oversee SDWA compliance of PWS as well as the 29 LPAs (underlined).

State Water Resources Control Board
Division of Drinking Water

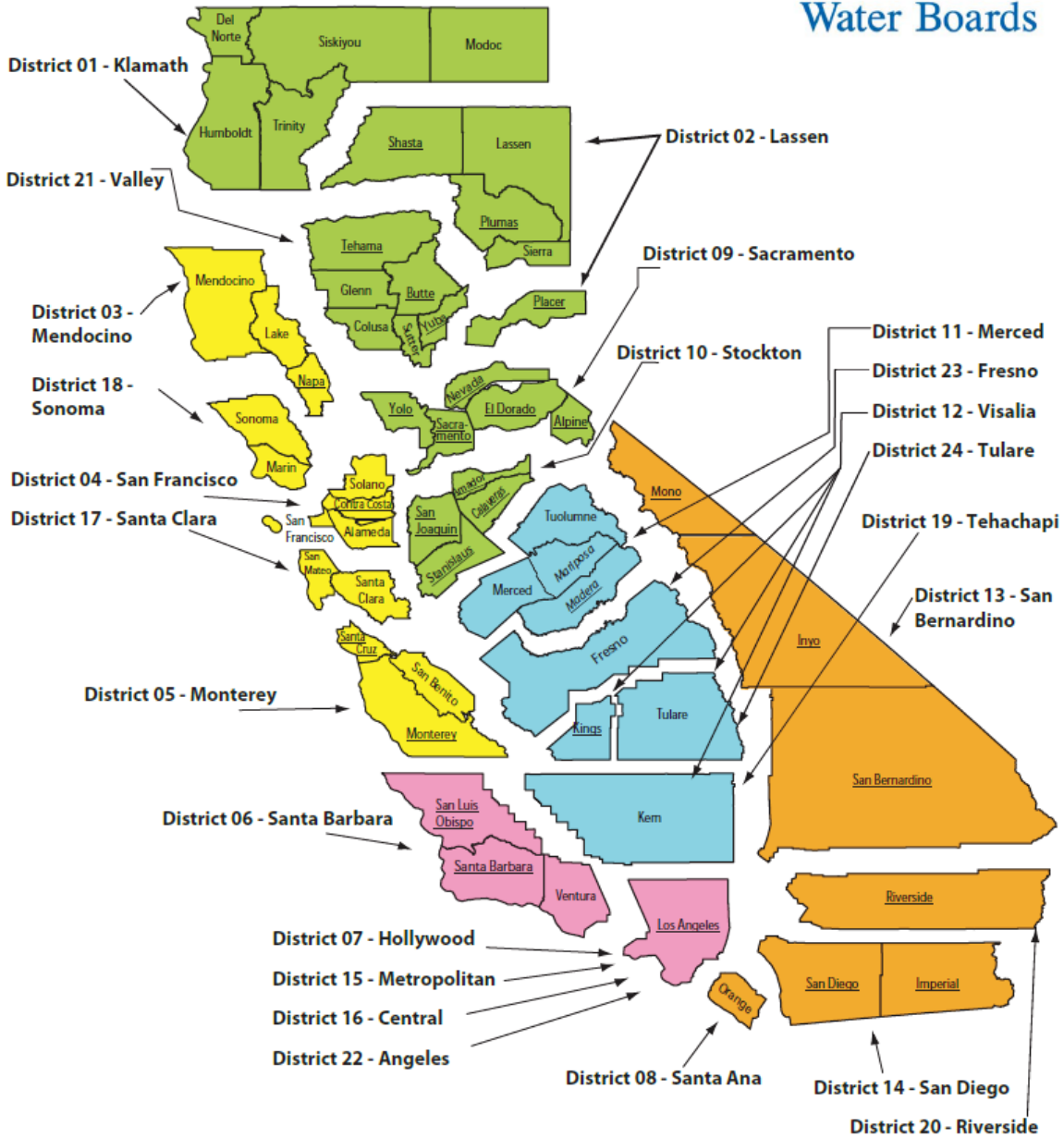


Figure 1 Division of Drinking Water (DDW) Field Operations Branch District Offices. Counties that are Local Primacy Agencies are underlined

1.3. Public Water Systems

A public water system (PWS) is defined as a system for the provision of water for human consumption through pipes or other constructed conveyances that has 15 or more service connections, or regularly serves at least 25 individuals daily for at least 60 days out of the year.

PWS are divided into three principle classifications: community water systems (CWS), nontransient noncommunity water systems (NTNC), and transient noncommunity water systems (TNC). Wholesale water systems are also regulated as public water systems although they may not serve water directly to individual customers or service connections.

Community water systems serve cities, towns and other areas with at least 15 service connections or 25 yearlong residents. Examples include water districts, cities, mutual water companies, mobile home parks and farm labor housing.

Nontransient noncommunity water systems are systems that provide water to the same non-residential users daily for at least 180 days out of the year but not to at least 25 year-long residents. Examples include day cares, schools, and places of employment.

Transient noncommunity water systems are systems that provide water for a population that is transient in nature, serving 25 or more people per day for at least 60 days per year. Examples include campgrounds, parks, ski resorts, roadside rest areas, churches, gas stations and motels.

A **wholesale water system** means an entity that supplies water to one or more public water systems for resale. These wholesale water systems are regulated as community water systems.

DDW and LPAs together regulate a total of 7,367 PWS in California (as of May 2021). LPAs are responsible for regulatory oversight of approximately 3,744 small PWS in 29 counties. This regulatory responsibility includes tasks such as issuance of operating permits, conducting sanitary surveys, monitoring for compliance with regulations, and taking enforcement actions to compel compliance when violations are identified, and reporting on those actions taken.

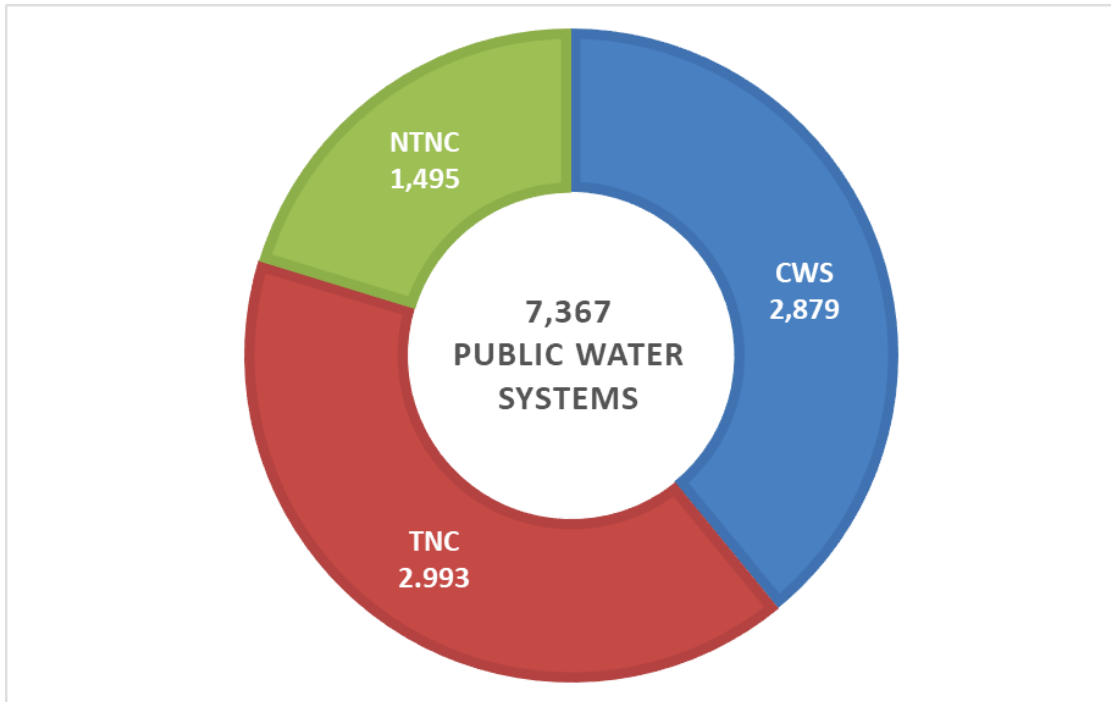


Figure 2 Number of public water systems by system classification (as of May 2021)

Figure 2 shows the number of public water systems in each of the classifications described. Community water systems are further classified by size. Regulations sometimes specify different requirements, such as monitoring requirements, for different sizes and types of water systems.

Table 1 shows how many water systems are in each size range, categorized by the number of connections served by the water system, and the total population that is served by water systems of that size range. Population figures are based on information submitted by public water systems. Public water systems use a variety of methods to estimate the population served that are not always derived from census counts (especially for the smaller water systems). Wholesale water systems are public water systems that deliver some or all of its finished drinking water to another public water system. Some wholesale water systems also directly serve finished drinking water to customers through a small number of service connections. The population directly served by these wholesale water systems is reflected in Table 1 under each service connection category.

Table 1 Number of Community Water Systems Statewide (as of May 2021)

Number of Service Connections	Typical Population Served	Number of Water Systems	Total of Population Served
3,300 or more	10,000 or more	659	38,654,001
1,000 to 3,299	3,000 to 10,000	279	525,832
500 to 999	1,500 to 3,000	216	151,760
100 to 499	300 to 1,500	928	208,575
25 to 99	75 to 300	743	42,141
Fewer than 25	25 to 75	37	163
Wholesale Water Systems	various	51	423,471(a)
Total		2,879	40,005,943 (b)

The population listed for wholesale water systems is the count of direct customers not the entire retail population served by those wholesale water systems.

The total population listed here is the number served by public water systems statewide

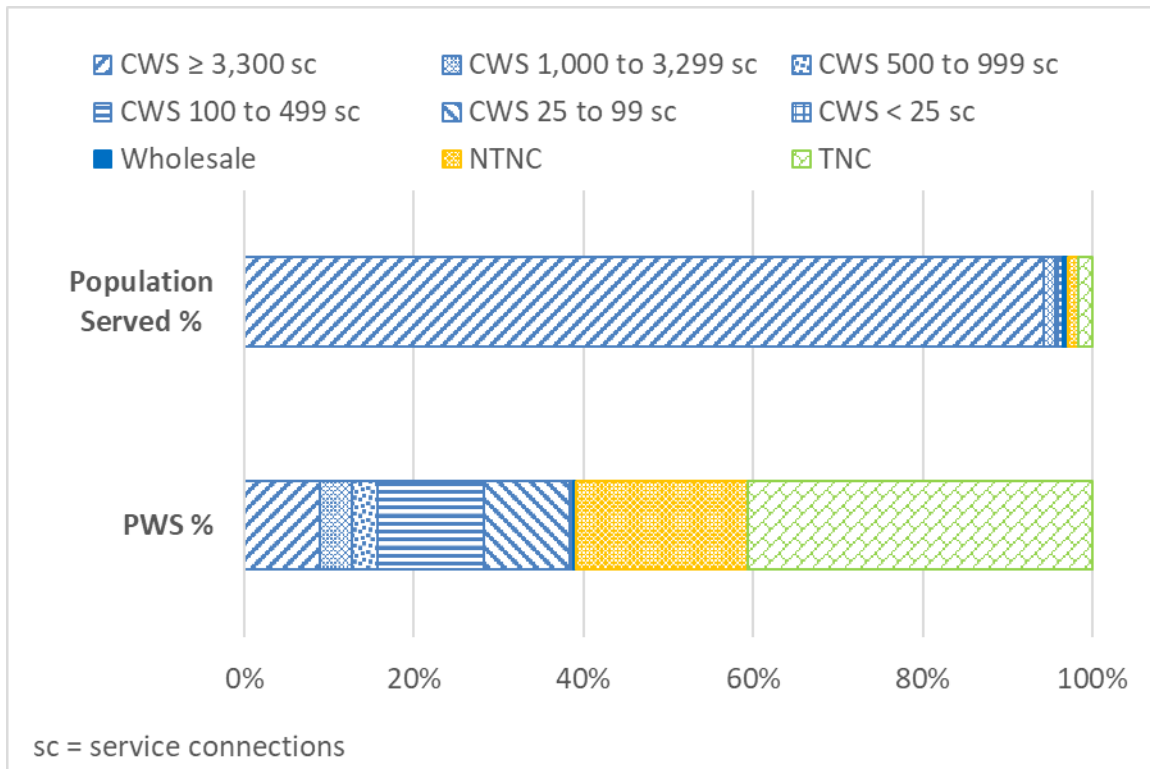


Figure 3 Categories of public water systems by size (number of service connections) and population served (as of May 2020)

Figure 3 shows that while community water systems serving 3,300 or more service connections make up about 9% of the total number of PWS, they provide water to 94% of the population served by PWS.

1.4. Sources of Drinking Water

Figure 4 shows the primary types of water sources that public water systems use to supply drinking water to their customers. Some regulations are applied differently for surface water and groundwater sources, and there are specific regulations in place that pertain to the treatment of surface water.

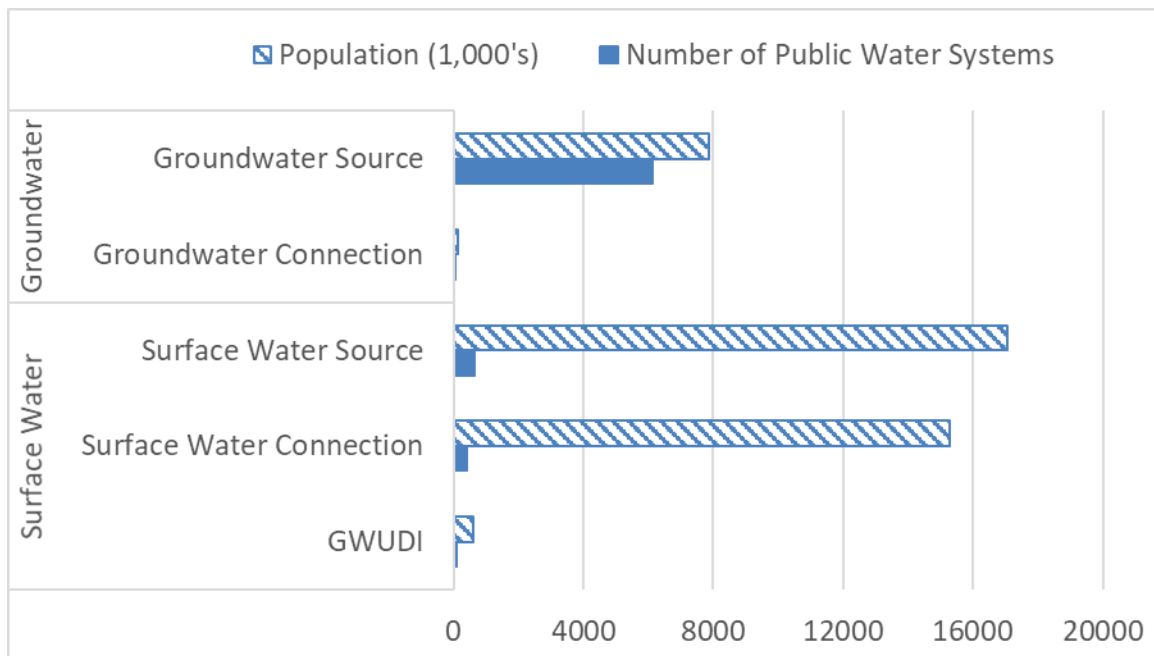


Figure 4 Primary sources of drinking water used by public water systems (as of May 2020)

Most public water systems in California use groundwater as their primary source of supply, but those that use surface water serve most of the population. Public water systems that use both groundwater sources and surface water sources are categorized as surface water systems by convention. GWUDI sources are groundwater under the direct influence of surface water and are categorized as surface water per regulations. Many public water systems do not operate their own sources and rely on interconnections with neighboring public water systems

to supply potable drinking water to their customers and are classified as consecutive systems with a source type matching the wholesale provider.

Although about 84% of public water systems use only groundwater as their primary source of water, these water systems serve less than 20% of the population. Sixteen percent (16%) of public water systems use surface water sources or a combination of surface water and groundwater, and these public water systems supply 80% of the population.

1.5. Safe Drinking Water Act

Under the 1974 federal SDWA and subsequent reauthorizations in 1986 and 1996, USEPA sets national limits on contaminant levels in drinking water for human consumption to protect the health of consumers. These limits are known as maximum contaminant levels (MCL) and maximum residual disinfectant levels (MRDL). For some regulations, treatment techniques (TT) or action levels (AL) have been established in lieu of an MCL as a means to control levels of specific contaminants in drinking water. Water systems are also regulated as to the frequency of monitoring and the reporting (M/R) of water quality or rule compliance. Systems can incur a violation for failure to collect required samples during a monitoring period (monitoring violations) or failure to report sample results or rule compliance in the required manner (reporting violations).

The SDWA requires PWS to notify their consumers when a drinking water standard has been violated, including MCL, TT, AL and M/R requirements. This notification is required to include:

- A clear and understandable explanation of the nature of the violation
- The potential adverse health effects from the violation
- The steps that the water system is undertaking to correct the violation
- The possible use of alternative water supplies available during the violation

There are three basic types of violations that a water system can incur:

- Violation of a Maximum Contaminant Level (MCL): Primary drinking water standards have been adopted by the State Water Board for contaminants that may be found in drinking water supplies in California. These limits are known as

MCLs and are necessary to protect the public from acute and chronic health risks associated with consuming water containing these contaminants.

- Violation of a Treatment Technique (TT): Treatment techniques and performance standards have been adopted as means to provide safe drinking water in instances where adoption of a specific MCL may be impractical or impossible. Treatment techniques are a proven means to reduce the risk from various contaminants by closely controlling the treatment processes.
- Violation of a Monitoring and/or Reporting Requirement (M/R): A water system is required to monitor and verify that the levels of contaminants present in the drinking water supplies do not exceed an MCL, MRDL or TT. A monitoring violation occurs when a water system fails to have its water tested as required within the required time frame. A reporting violation occurs when a water system fails to report test results in a timely manner to the regulatory agency or fails to provide certification that mandated information was provided to the public, such as through the issuance of a public notice or the annual Consumer Confidence Report. A water system that fails to perform required monitoring for a group of chemicals (such as synthetic organic chemicals or volatile organic chemicals) would incur a monitoring violation for each of the individual chemicals within the group.

1.6. Annual Compliance Report

Section 1414(c)(3) of the federal Safe Drinking Water Act requires states to provide USEPA and the public with an annual report of violations of the federally adopted primary drinking water standards. This report provides the numbers of violations in each of six categories: MCLs, MRDLs, treatment techniques, variances and exemptions, significant monitoring and/or reporting violations, and significant public or consumer notification violations. Significant monitoring and/or reporting violations occur when no samples are taken, or no results are reported during a compliance period. A significant public notification or CCR notification violation occurs when a public water system completely fails to provide the required notification to its customers or to the public.

California adopted more stringent MCLs than the federally adopted primary drinking water standards for several contaminants, summarized in Table 2. Reported MCL violations for contaminants listed in this table are violations of the more stringent California standards.

Table 2 Regulated Contaminants Where California MCLs Are More Stringent Than Federal MCLs

	<i>CA MCL</i>	<i>Federal MCL</i>	<i>Units</i>
<i>Inorganic Contaminants:</i>			
• Barium	1	2	mg/L
• Chromium	50	100	ug/L
• Cyanide	150	200	ug/L
• Fluoride	2	4	mg/L
<i>Synthetic Organic Contaminants</i>			
• Atrazine	1	3	ug/L
• Carbofuran	18	40	ug/L
• Chlordane	0.1	2	ug/L
• Di (2-ethylhexyl) phthalate	4	6	ug/L
• Heptachlor	0.01	0.4	ug/L
• Heptachlor Epoxide	0.01	0.2	ug/L
• Methoxychlor	30	40	ug/L
• Oxamyl	50	200	ug/L
<i>Volatile Organic Contaminants</i>			
• Benzene	1	5	ug/L
• Carbon Tetrachloride	0.5	5	ug/L
• 1,4-Dichlorobenzene	5	75	ug/L
• 1,2-Dichloroethane	0.5	5	ug/L
• 1,1-Dichloroethylene	6	7	ug/L
• cis-1,2-Dichloroethylene	6	70	ug/L
• trans-1,2-Dichloroethylene	10	100	ug/L
• Ethylbenzene	300	700	ug/L
• Monochlorobenzene	70	100	ug/L
• Toluene	150	1000	ug/L
• 1,2,4 Trichlorobenzene	5	70	ug/L
• Vinyl Chloride	0.5	2	ug/L
• Xylenes	1,750	10,000	ug/L

This report does not address private domestic wells serving individual homes and facilities that are not public water systems, including state small water systems (water systems having between 5 and 14 service connections) that are regulated under the California SDWA.

1.7. Data Presented in This Report

The data presented in this Annual Compliance Report is from the state's Safe Drinking Water Information System (SDWIS-State), the database of record for the inventory and compliance data required to support California's Drinking Water Program and reporting to USEPA. In past years, DDW used data downloaded from USEPA (SDWIS/FED) that in turn was previously uploaded by DDW to USEPA. Because of the complex data handling process between DDW and USEPA, DDW has found inaccuracies in the information retrieved from SDWIS/FED. Additionally, recent increases in staffing of DDW's Data Management Unit allowed for improved technical support for reporting and data cleanup activities. While DDW continues efforts to improve the quality of the data reported to USEPA to ensure data extractions from USEPA provide accurate and useful information, DDW has determined that data retrieved from SDWIS-State is the most accurate dataset to use as the basis of this and future Annual Compliance Reports.

DDW continues to upload data each quarter from SDWIS-State to USEPA. The data submitted include, but are not limited to, PWS inventory information; information on MCL, MRDL, monitoring and reporting, and treatment technique violations for regulated contaminants; violations concerning public and consumer notification; information on enforcement activities related to these violations; and data associated with the Lead and Copper Rule. The USEPA Regional offices also report federal enforcement actions taken against state-regulated public water systems.

The 2020 Annual Compliance Report lists federal violations by the following categories:

1. Inorganic Contaminants (IOC)
2. Synthetic Organic Contaminants (SOC)
3. Volatile Organic Contaminants (VOC)
4. Radionuclide Contaminants (RAD)
5. Revised Total Coliform Rule (rTCR)
6. Disinfectants and Disinfection By-Products Rule (DBPR), including Stage 1 DBPR and Stage 2 DBPR
7. Surface Water Treatment Rule (SWTR), including the Filter Backwash Rule, Interim Enhanced SWTR, Long Term 1 Enhanced SWTR, and Long Term 2 Enhanced SWTR

8. Groundwater Rule (GWR)
9. Lead and Copper Rule (LCR)
10. Public Notification Rule (PN)
11. Consumer Confidence Report Rule (CCR)
12. Variances and exemptions (V/E)

1.8. California-Specific Drinking Water Standards

This report provides a separate summary and accounting of violations of state-regulated contaminants that are not federally regulated. A list of these California-specific regulated contaminants is presented in Table 3. Discussion of California-specific violations is provided in Section 3.4 and 3.5.

Table 3 Contaminants Additionally Regulated Under the California SDWA

<p><i>Inorganic Contaminants</i></p> <ul style="list-style-type: none"> • Perchlorate • Aluminum • Nickel <p><i>Synthetic Organic Contaminants</i></p> <ul style="list-style-type: none"> • Bentazon • Molinate • Thiobencarb • 1,2,3-Trichloropropane <p><i>Volatile Organic Contaminants</i></p> <ul style="list-style-type: none"> • Methyl tert-butyl ether (MTBE) • 1,1-Dichloroethane • 1,3-Dichloropropene • 1,1,2,2-Tetrachloroethane • Trichlorofluoromethane • 1,1,2-Trichloro-1,2,2-trifluoroethane

Additionally, DDW maintains violation records of California-specific drinking water standards, including the following:

1. CA TCR - California's TCR regulations are slightly different than the federal TCR regulations, such as requirements for weekly coliform monitoring. Additionally, the state TCR regulations have not yet been updated to reflect the federal Revised Total Coliform Rule (rTCR), so the Drinking Water Program staff is tracking violations for both the rTCR and state TCR.

2. Secondary Standards - California regulates the contaminants or water quality constituents in the following table for aesthetic effects, including taste, odor, and appearance. All CWS must monitor for these contaminants on a regular basis to determine compliance with Secondary MCLs, which are also called “consumer acceptance contaminant levels” (or “consumer acceptance contaminant level ranges” for certain constituents).

Contaminants with Secondary MCLs:

- | | |
|----------------------------------|--------------------------|
| • Aluminum | • Silver |
| • Color | • Thiobencarb |
| • Copper | • Turbidity |
| • Foaming Agents (MBAS) | • Zinc |
| • Iron | • Total Dissolved Solids |
| • Manganese | • Specific Conductance |
| • Methyl-tert-butyl ether (MTBE) | • Chloride |
| • Odor | • Sulfate |

3. The Drinking Water Program collects violation information for the following state requirements:
- Operator Certification (OP) – failure of a PWS to have an operator certified by the state at the appropriate certification level.
 - Waterworks Standards (WW) – failure to comply with the California Waterworks Standards
 - Permit (PT/PP) – operating a water system without a permit, or violation of a permit provision
 - Annual Report (AR) – failure to submit an annual report to the Drinking Water Program
 - Cross-Connection Control (CC) – failure to comply with the Cross-Connection Control Regulations
 - Treatment Technique (T1) – failure to provide treatment as specified in the operating permit
 - Reporting Requirement (RR) – failure to submit a compliance report to the Drinking Water Program, including those related to the school lead sampling program or PFAS (California Health and Safety Code (CHSC) section 116277).
 - Lead Service Line Inventory (LSL)– failure to comply with the requirements of CHSC section 116885

Chapter 2. Review of 2020 Violation Data

Public water systems must conduct monitoring on a routine basis for regulated contaminants and to satisfy treatment technique requirements to document that the water provided meets the drinking water standards. PWS must submit the data and compliance information to DDW and LPAs as the results are received and must summarize and report the compliance status on a regular basis as prescribed by the regulations. DDW and LPAs track the violations incurred by PWS in DDW's SDWIS-State database. A summary of the major violations described below are summarized in this section. Detailed tables of violations are included in the Appendix of the report.

- Maximum contaminant level (MCL) violations
- Maximum residual disinfectant level (MRDL) violations
- Treatment technique requirement (TT) violations
- Significant monitoring and/or reporting requirements (M/R) violations
- Variances and exemptions violations
- Recordkeeping violations
- Significant public notification requirement violations
- Significant consumer confidence report (CCR) notification requirement violations.

2.1. Overview of Violations for Calendar Year 2020

In 2020, 1,590 violations for federally regulated contaminants or rules were incurred by public water systems, with 812 violations for failing to meet an MCL/TT and 778 violations for failing to meet a monitoring and/or reporting (M/R) requirement. Table 4 shows the number of violations by category for MCL/TT and M/R requirements occurred in 2018, 2019 and 2020. There is significant reduction overall in MCL/TT violations over the past three reporting years as a result of DDW's continuous effort to provide safe drinking water to Californians, such as increased funding towards those water systems to support projects addressing ongoing violations and prioritization for support under the Safe Affordable Funding for Equity and Resilience (SAFER) program.. The highest number of MCL/TT violations incurred in 2020 is for violation of an inorganic contaminant MCL, followed by violation of a DBPR and SWTR requirement. The high number of MCL violations for inorganic contaminants were primarily due to nitrate and arsenic. The highest number of M/R violations were for the Lead and Copper Rule and the Revised Total Coliform Rule.

Table 4 Number of Federal Violations by Rule Category for Maximum Contaminant Levels / Treatment Techniques (MCL/TT) and Monitoring / Reporting Requirements (M/R)

No	Category	2018 MCL/TT	2018 M/R	2019 MCL/TT	2019 M/R	2020 MCL/TT	2020 M/R
1	Inorganic Contaminants	742	116	656	174	491	111
2	Synthetic Organic Contaminants	5	3	5	0	9	12
3	Volatile Organic Contaminants	0	3	0	2	0	3
4	Radionuclide Contaminants	134	7	117	6	70	5
5	Revised Total Coliform Rule	30	434	48	421	11	277
6	Disinfection By-Products Rule	202	54	149	57	124	26
7	Surface Water Treatment Rules	176	11	136	6	103	10
8	Groundwater Rule	3	18	7	12	2	11
9	Lead and Copper Rule	8	599	8	422	2	277
10	Public Notification Rule	---	30	---	9	---	1
11	Consumer Confidence Report Rule	---	175	---	74	---	38
12	Variances and Exemptions	---	2	---	0	---	7

In 2020, about 802 violations of California-specific drinking water standards were incurred by public water systems, with 444 violations for failing to meet an MCL/TT, 272 violations for failing to meet a monitoring or reporting requirement, and 86 violations of other California SDWA requirements that are currently being tracked in SDWIS-State. Table 5 shows the number of violations by category for MCL/TT, M/R, and other requirements. The highest number of MCL/TT violations were for violations of the MCL for 1,2,3 trichloropropane (123TCP), followed by the TCR. The violations of rTCR is presented in Table 4, and the violations of California's TCR is presented in Table 5. The number of TCR violations for 2020 is fewer than those incurred by public water systems in previous years.

Table 4 Number of California-specific violations by category for MCLs/TTs, M/R and other requirements

No	Category	2019 MCL/TT	2019 M/R	2019 Other	2020 MCL/TT	2020 M/R	2020 Other
1	Primary Inorganic Contaminants & TT	8	0	---	4	0	---
2	Synthetic Organic Contaminants (SOCs)	452	45	---	301	35	---
3	Volatile Organic Contaminants (VOCs)	0	0	---	0	0	---
5	Secondary Standards	22	22	---	25	11	---
6	CA Total Coliform Rule (TCR)	315	69	---	102	50	---
7	Operator Certification - Failure to have an operator at the appropriate certification level	---	---	26	---	---	16
8	Waterworks Standards - Failure to comply with a Waterworks Standard	---	---	17	---	---	22
9	Permits - Violation of a permit provision	---	---	28	---	---	39
10	Permits - Operating without a permit	---	---	11	---	---	5
11	Annual Report - Failure to submit an Annual Report to DDW	---	---	43	---	---	164
12	Cross-Connection Control	---	---	2	---	---	4
13	Treatment Technique	---	---	14	---	---	12
14	Reporting Requirement	---	---	5	---	---	12
15	Lead Service Line Inventory	---	---	8	---	---	0

2.2. Overview of Public Water System Compliance for Calendar Year 2020

In 2020, 686 public water systems violated at least one federal drinking water standard described in Section 1.7, with 248 public water systems violating one or more MCL/TTs, 465 public water systems violating one or more M/R requirements, and 27 public water systems violating both MCL/TTs and M/R requirements.

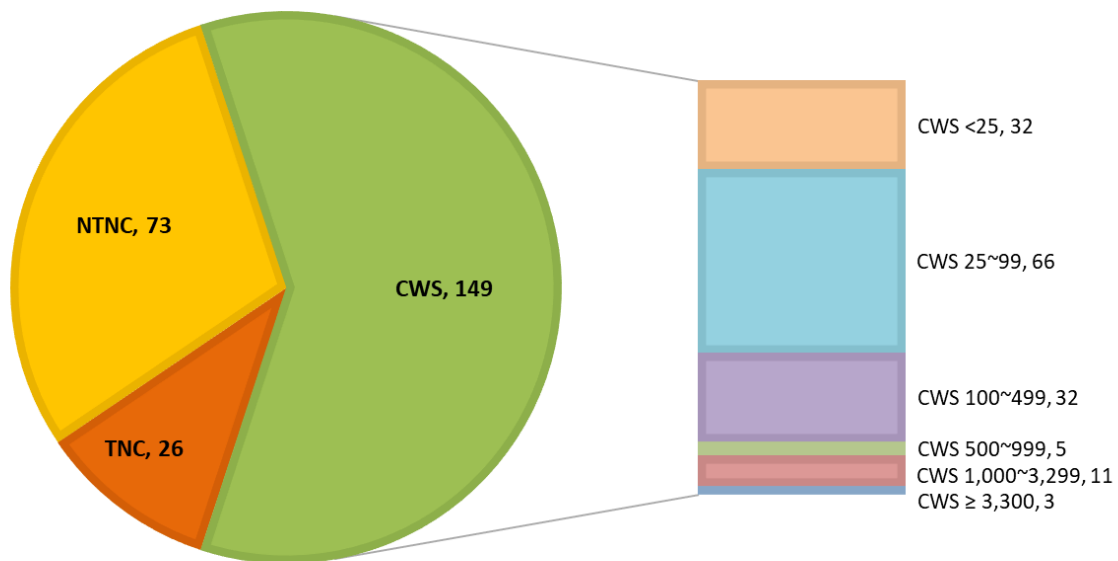


Figure 5 Number of PWS with one or more federal regulated MCL/TT violations in 2020

Figure 5 shows that more than 90% of the MCL or TT violations were incurred by NTNC, TNC, and CWS serving less than 500 service connections. About 60% of PWS that incurred an MCL or TT violation in 2020 were CWS. A breakdown by size of the CWS, categorized by the number of service connections served by the CWS (greater than 3,300 service connections, between 1000 and 3,300 service connections, etc.), is shown in the bar graph in Figure 5, along with the number of CWS in the size range with one or more violations. A similar trend is seen for the public water systems that incurred monitoring and reporting violations in 2020, as shown in Figure 6.

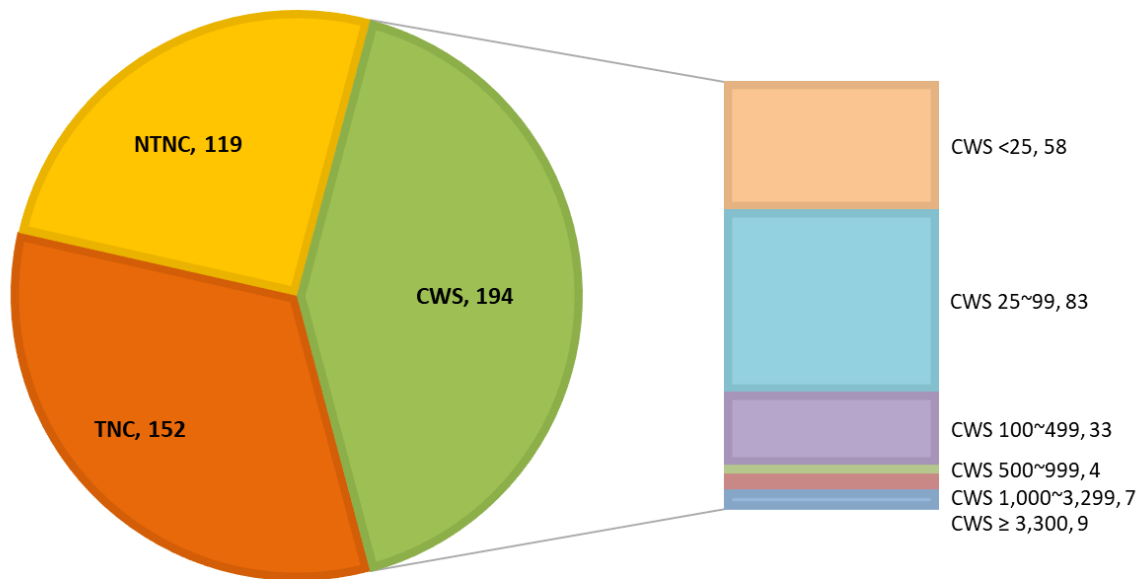


Figure 6 Number of PWS with one or more federal regulated monitoring and reporting violations in 2020

Table 6 summarizes the number and population of water systems with violations of maximum contaminant levels, maximum residual disinfectant levels and treatment techniques for the past three years. Federal Revised Total Coliform Rule (rTCR) changed how violations are accounted for federal reporting. As noted previously, California is still tracking compliance with the TCR until it adopts state regulations for the rTCR in July 1, 2021. Under the TCR, an exceedance of the Total Coliform MCL is a violation. Under rTCR, a “corrective action” process must be followed if a Total Coliform MCL is exceeded; and failure to complete the corrective action is also a violation.

Table 5 Number and Population of Water Systems with Violations of Maximum Contaminant Level (MCL), Maximum Residual Disinfection Level (MRDL), and/or Treatment Technique (TT)

No	Category	2018 # PWS	2018 Population	2019 # PWS	2019 Populatio n	2020 # PWS	2020 Population
1	Inorganic Contaminants	224	147,446	219	99,770	165	59,965
2	Synthetic Organic Contaminants	3	3,613	2	530	3	630
3	Volatile Organic Contaminants	0	0	0	0	0	0
4	Radionuclide Contaminants	38	16,517	41	14,621	25	9,121
5	Revised Total Coliform Rule	28	126,206	43	24,927	12	2,064
6	Disinfection By-Products Rule	54	294,748	51	137,569	39	138,711
7	Surface Water Treatment Rules (SWTR)	35	4,089,627 (a)	23	9,049	13	1,229
8	Groundwater Rule	2	257,561	5	259,791	2	769
9	Lead and Copper Rule	8	10,331	7	9,857	2	350

(a) A SWTR TT violation at Los Angeles Department of Water and Power in January 2018 – a 9-hour lapse in surface water disinfection where the 4-log virus inactivation requirement was not achieved.

Table 7 summarizes the number and population of water systems with violations of monitoring and reporting requirements for the last three years.

In addition to the rules and violations required to be reported in the Annual Compliance Report, 474 public water systems violated at least one California-specific drinking water standard described in Section 1.8, with 172 public water systems violating one or more MCL/TTs, 250 public water systems violating one or more M/R requirements, and 11 public water systems violating both MCL/TTs and M/R requirements for state-regulated contaminants. 74 PWS violated other requirements specific to California’s drinking water regulations, such as permit provision requirements. These are further discussed in Section 3.13.

The following additional data summary tables are included in the appendix to this report. These tables list public water system that have incurred violations of MCLs of three compounds of interest, sorted by county and water system number. The table also provides the population served by these water systems.

- Appendix A – exceedance of arsenic MCL.
- Appendix B – exceedance of the nitrate, nitrite, or combined nitrate-nitrite MCLs.
- Appendix C – exceedance of the 1,2,3-trichloropropane MCL.

Table 6 Number and Population of Water Systems with Federal Violations of Monitoring and Reporting Requirements (M/R)

No	Category	<u>2018</u> # of PWS	<u>2018</u> Popu- lation	<u>2019</u> # of PWS	<u>2019</u> Popu- lation	<u>2020</u> # of PWS	<u>2020</u> Popu- lation
1	Inorganic Contaminants	108	118,525	170	92,037	83	22,631
2	Synthetic Organic Contaminants	3	89,489	0	0	3	580
3	Volatile Organic Contaminants	3	157,418	2	499,276	3	365
4	Radionuclide Contaminants	4	88,982	3	1,007,594	2	101
5	Revised Total Coliform Rule	315	81,945	308	146,159	190	1,948,015 (a)
6	Disinfectant and Disinfection By-Products Rule	34	404,433	35	206,937	17	29,693
7	Surface Water Treatment Rules	5	703	4	2,230	4	7,413
8	Groundwater Rule	16	80,006	12	32,282	11	87,504
9	Lead and Copper Rule	496	803,835	363	492,790	163	88,216
10	Public Notification Rule	13	54,148	5	14,884	1	77
11	Consumer Confidence Report Rule	136	31,003	61	19,309	29	11,353
12	Variances and exemptions	2	400	0	0	4	547

(a) One RTCR monitoring violation occurred at City of San Diego (population served 1,394,515) from December 2019 to April 2020 and the system has returned to compliance in May 2020. Another RTCR monitoring violation occurred at Irvine Ranch Water District (population served 422,000) in September 2020 and the system has returned to compliance in October 2020.

Chapter 3. Discussion of Violations

This section contains summary information on violations of MCLs and TTs. More specific information on the quality of water provided by a public water system can be obtained by requesting a copy of the Consumer Confidence Report (CCR) that all CWS and NTNC are required to issue to their customers annually. To obtain a copy of a CCR, customers may contact the public water system serving the area. Many public water systems also post their CCR online. The State Water Board provides access to the CCRs received from PWS on the CA Drinking Water Watch webpage at <https://sdwis.waterboards.ca.gov/PDWWW/>. The CA Drinking Water Watch webpage also provides access to public water system contact information, water quality data, and violation and enforcement information. When a public water system has violated a drinking water standard, the public water system is required to provide a public notice to their consumers and make copies of the notice available upon request to others.

Sections 3.1 of this report discuss violations of federal primary MCLs and TT requirements, Section 3.2 discuss violations of federal monitoring and reporting requirements, Section 3.3 discuss variance and exemption violations, Section 3.4 reports violations of California-specific drinking water MCL standards and Section 3.5 reports violations of California-specific monitoring, reporting and other standards.

3.1. Federal MCL and Treatment Technique Violations

3.1.1. Inorganic Contaminants

All CWS and NTNC are required to meet primary drinking water standards for 18 inorganic contaminants. TNC must monitor and comply with the MCLs for nitrate and nitrite. A total of 491 violations of inorganic contaminant MCLs were recorded for the year, as summarized in Table 8.

Figure 7 below shows that of the 165 PWS that incurred one or more inorganic contaminant MCL violations of in 2020, 98% were non-community water systems and CWS with less than 500 service connections.

Table 8 Summary of Inorganic Contaminates MCL Violations and PWS Counts

Contaminant	Violation Category	# of Violations	# of PWS
Arsenic	MCL	208	70
Cadmium	MCL	4	1
Fluoride	MCL	34	12
Mercury	MCL	4	1
Nitrate	MCL	238	86
Total Nitrate + Nitrite	MCL	2	1
Selenium	MCL	1	1
Total		491	165 (a)

(d) The total number of PWS is less than the sum of the PWS of each contaminant listed, since a PWS may have violations of more than one contaminant

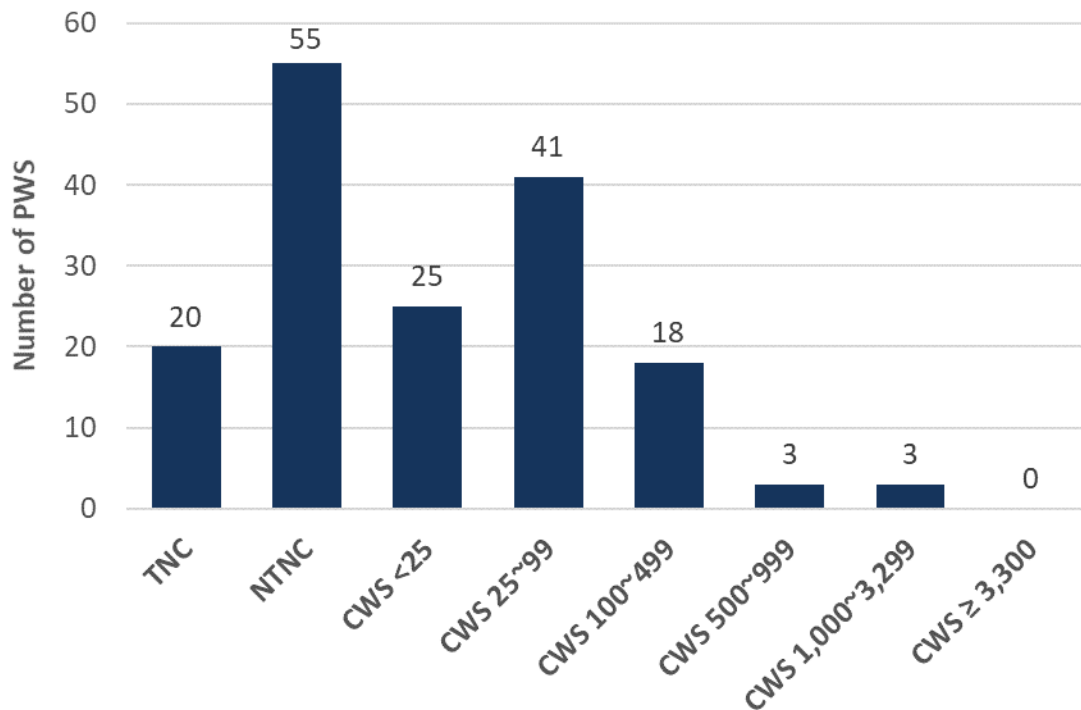


Figure 7 Number of PWS with Inorganic Contaminant MCL Violations, by water system type/CWS size (# of service connections).

Arsenic In 2020, 70 PWS incurred 208 arsenic MCL violations. Arsenic violations accounted for about 42% of all inorganic chemical MCL violations in 2020. The arsenic MCL is 0.010 mg/L, and compliance with the arsenic MCL is determined based on a running annual average. When a PWS exceeds the

The major sources of arsenic in drinking water are from erosion of natural deposits. Other sources of arsenic may include runoff from orchards, and wastes from glass and electronics production. Some people who drink water containing arsenic in excess of the MCL for many years could experience skin damage or problems with their circulatory system and may have an increased risk for cancer.

Figure 9 shows the types of PWS that incurred arsenic MCL violations in 2020. Noncommunity water systems and CWS serving less than 500 connections account for 94% of the total number of PWS that incurred an arsenic MCL violation in 2020.

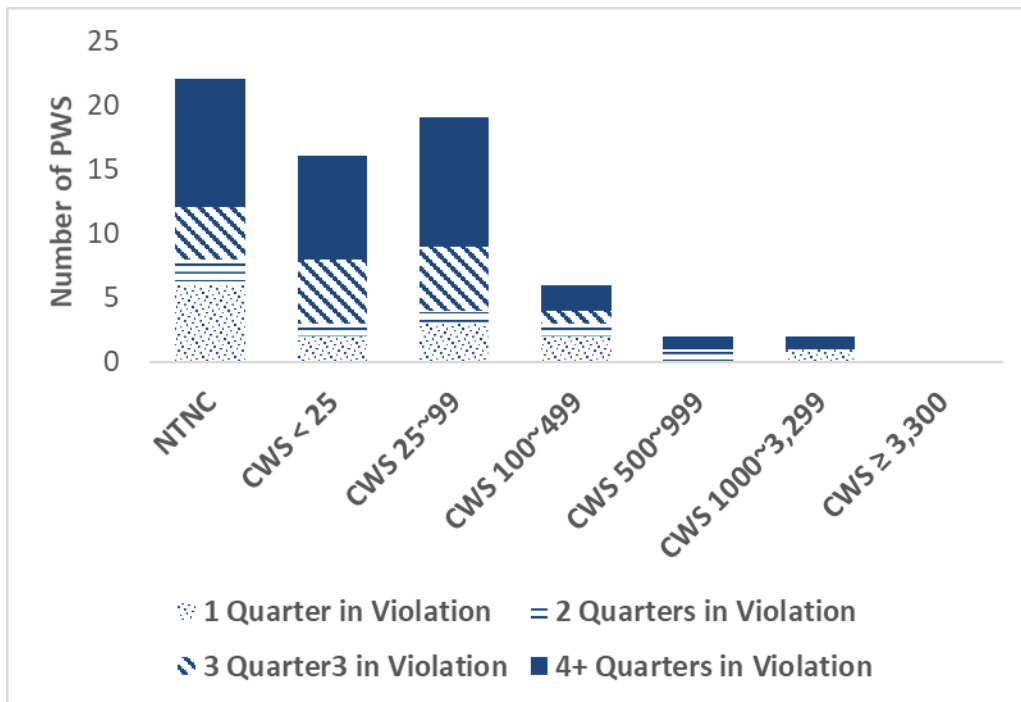


Figure 9 Number of PWS with arsenic MCL violations for each PWS type/CWS size and duration of the violation

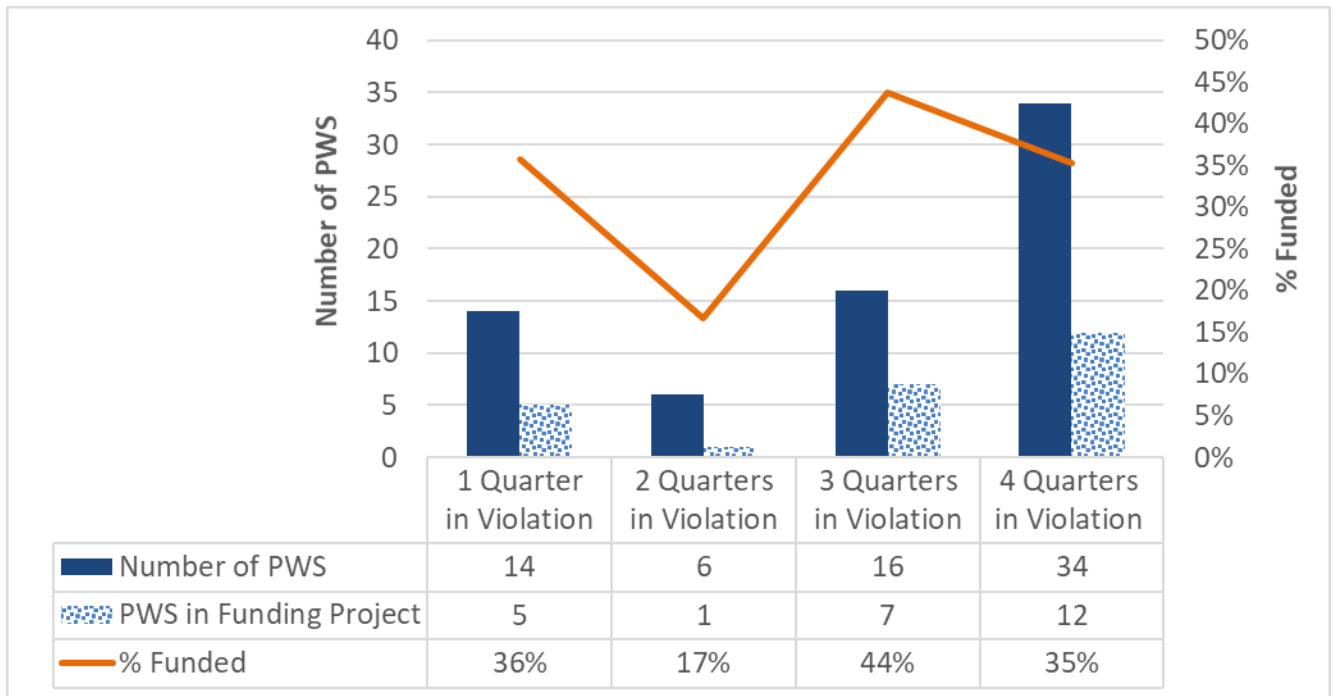


Figure 10 Number of PWS with arsenic MCL violations and % of the PWS with funding projects for different durations of the violation.

Figure 10 shows the duration of arsenic violations recorded in 2020. 34 PWS incurred arsenic MCL violations in all four quarters of 2020, indicating persistent non-compliance with the arsenic MCL for these systems. A total of 25 PWS (~36% of the PWS with arsenic MCL violations) are currently receiving funding through the State Water Board to address the arsenic violations.

Cadmium In 2020, one PWS incurred four cadmium MCL violations. This PWS is in Monterey County. The major sources of cadmium in drinking water is internal corrosion of galvanized pipes; erosion of natural deposits; discharge from electroplating, industrial chemical factories, and metal refineries; runoff from waste batteries and paints. Some people who drink water containing cadmium in excess of the MCL over many years may experience kidney damage.

Fluoride in 2020, 12 PWS incurred 34 fluoride violations against the California fluoride MCL. Sixteen (16) of those violations also violated the higher federal fluoride MCL. The MCL for fluoride in California is 2 mg/L, which is lower than the 4 mg/L federal MCL. These PWS are in Inyo, Kern, Madera, Monterey, San Benito, San Bernardino, San Diego and Tulare County. The major source of naturally occurring fluoride in drinking water is erosion of natural deposits.

Sources of fluoride associated with human activities include discharges from fertilizer and aluminum processing facilities. Some people who drink water containing fluoride in excess of the federal MCL of 4 mg/L over many years may get bone disease, including pain and tenderness of the bones. Children under nine years of age who drink water containing fluoride in excess of the California MCL may get mottled teeth (a brownish staining of the teeth called “dental fluorosis”).

Because fluoride also has a beneficial effect in preventing dental caries (tooth decay), some communities may add fluoride to their drinking water (fluoridation). Where fluoridation is practiced, fluoride concentrations are maintained at the optimal level for reduction of dental caries which is well below the state MCL.

Mercury In 2020, one PWS exceeded the mercury MCL of 2 ug/L in all four quarters of 2020. This PWS is in Stanislaus County. In the United States, mercury compounds are manufactured in small amounts for specialty uses, such as chemical and pharmaceutical applications. Mercury may also be present from erosion of natural deposits or runoff from landfills and cropland. Mercury in groundwater may be due to leakage from some submersible pumps. Mercury exposure at levels above the MCL in drinking water over many years may result in mental disturbances, or impaired physical coordination, speech and hearing.

Nitrate (including nitrite and nitrate+nitrite combined) In 2020, 86 PWS incurred 238 nitrate MCL violations while one PWS incurred 2 nitrate+nitrite combined MCL violations, accounting for 48% of all inorganic chemical MCL violations in 2020. Nitrate and nitrite are commonly found in fertilizers used in farming and gardening. Nitrates are also found in sewage and waste from humans, animals, and some industrial processes, and may be a result of erosion of natural deposits. Contamination from nitrate and nitrite is usually the result of human activities. There are few mineral deposits containing naturally occurring nitrate or nitrite in California.

Excessive levels of nitrate and nitrite in drinking water can cause serious illness and, in rare cases, even death in infants less than six months of age. This is a result of interference with the oxygen carrying capacity of the infant’s blood, called “blue baby syndrome” or “methemoglobinemia.” This is an acute disease in that symptoms can develop rapidly. Symptoms of nitrate exposure in infants include shortness of breath and a marked blueness of the skin. As infants mature, changes in the digestive system naturally occur that stops the conversion of nitrates to nitrites, hence reducing the risk of health effects.

High nitrate levels may also affect the oxygen-carrying ability of the blood of pregnant women. Expert medical advice and an alternate source of drinking water are recommended if one suspects nitrate levels may be a cause for concern. Local and state health authorities are the best sources for information concerning alternate sources of drinking water. The State Water Board has set the drinking water standard at 10 mg/L nitrate (measured as nitrogen, or 'N'), 1 mg/L for nitrite (measured as N), and 10 mg/L nitrate+nitrite (sum as N) to protect against the risk of these adverse effects. Drinking water that meets the drinking water standard is associated with little to no risk for nitrate or nitrite toxicity and is considered safe with respect to those compounds.

Due to the acute health effects of nitrate and nitrite, an MCL violation is incurred if the average of a sample result and the confirmation sample result exceeds the MCL. The confirmation sample must be collected within 24 hours of notification by the laboratory that a sample exceeded the MCL. If a confirmation sample is not collected within 24 hours of notification, the PWS is immediately in violation of the MCL, and must therefore issue a public notice to its customers as soon as possible within 24 hours, informing the public of the violation, including key information such as the potential health impacts, what the PWS is doing to correct the problem, and what the public can do to protect their health in the interim.

Figure 11 shows the areas in the state where PWS have incurred nitrate or nitrite MCL violations in 2020.

Figure 12 shows the categories of PWS that incurred nitrate or nitrite MCL violations in 2020. Noncommunity water systems and CWS serving less than 500 connections account for 99% of the total number of PWS that incurred a nitrate MCL violation in 2020. TNC accounted for 23% while NTNC accounted for 38% of PWS with nitrate/nitrite violations, and CWS serving less than 500 connections accounted for 38% of the PWS with nitrate/nitrite violations.

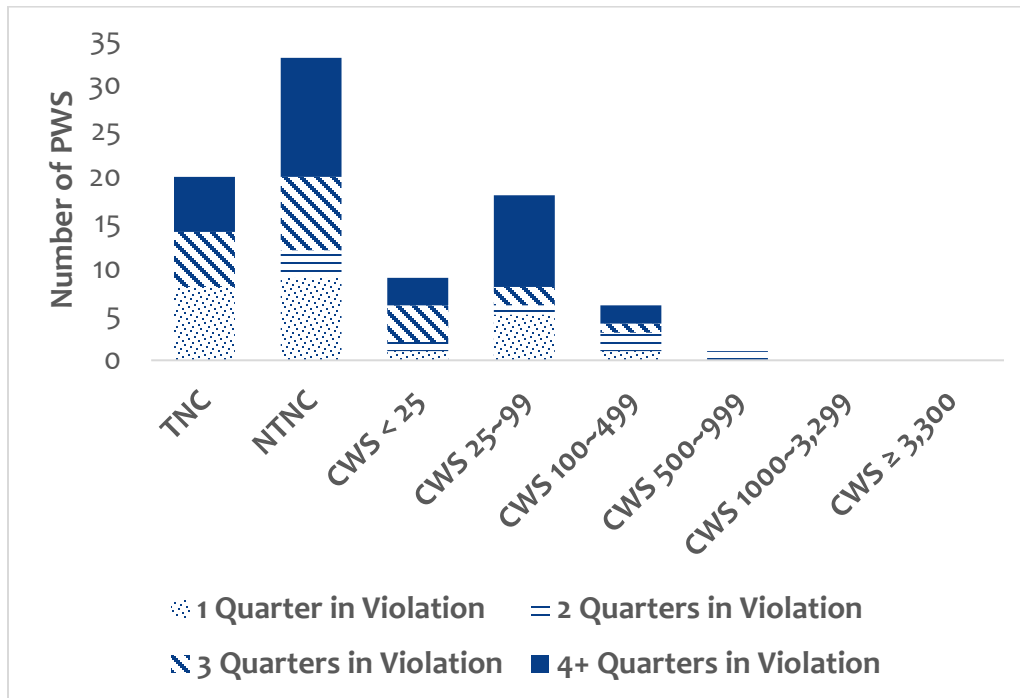


Figure 12 Number of PWS with nitrate or nitrite MCL violations for each PWS type/CWS size and duration of violation

Figure 13 below shows the duration of nitrate/nitrite violations recorded in 2020. A total of 87 PWS incurred nitrate or nitrite MCL violation, 24 PWS for a duration of 1 quarter (3 months or less), 8 PWS for 2 quarters, 21 PWS for 3 quarters and 34 PWS for four quarters. Records show that 23 of these PWS (~26% of the PWS with nitrate/nitrite MCL violations) are currently receiving funding through a State Water Board funding program, such as the Drinking Water State Revolving Fund, to address the MCL violation.

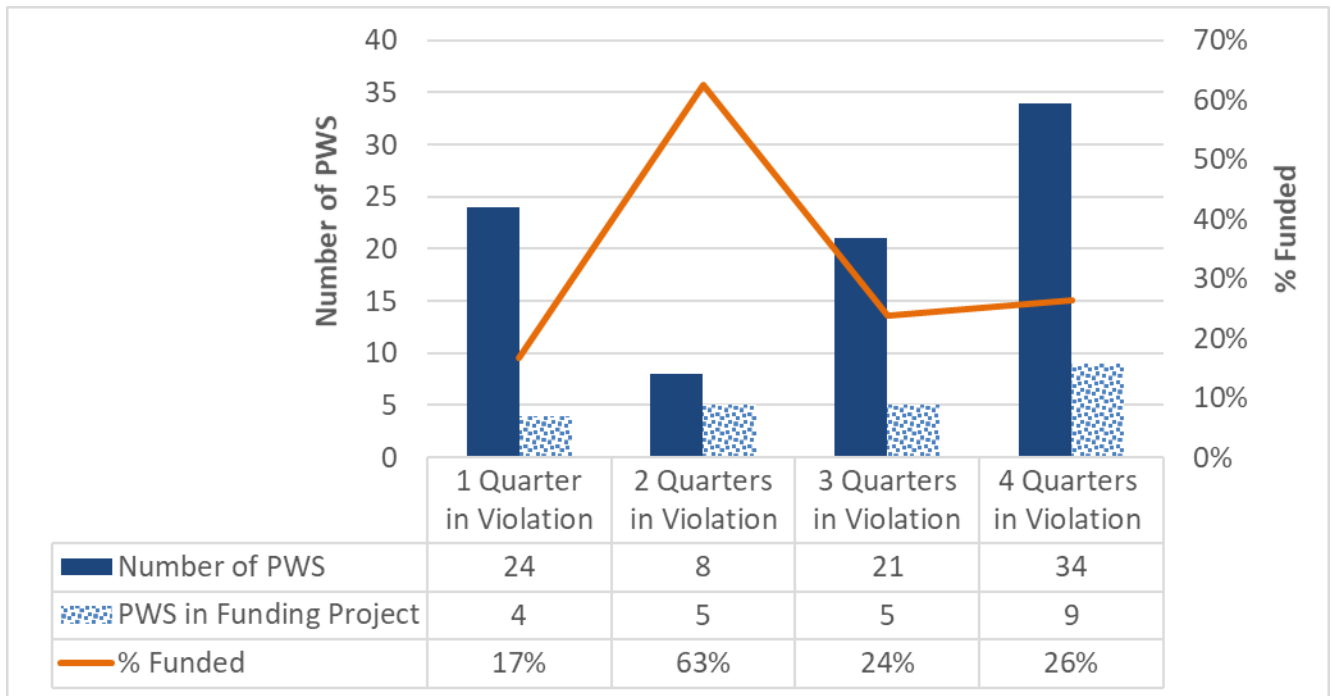


Figure 13 Number of PWS with nitrate or nitrite MCL violations and % of the PWS with funding projects for different durations of the violation.

Selenium In 2020, one PWS violated the selenium MCL of 50 ug/L. This PWS is in San Luis Obispo County. Selenium is an essential nutrient. However, some people who drink water containing selenium in excess of the MCL over many years may experience hair or fingernail losses, numbness in fingers or toes, circulation system problems and may have an increased risk of getting cancer. Sources of selenium are discharge from petroleum, glass, and metal refineries; erosion of natural deposits; discharge from mines and chemical manufacturers; runoff from livestock lots (feed additive).

3.1.2. Synthetic Organic Contaminants

CWS and NTNC are required to meet primary drinking water standards for up to 33 synthetic organic contaminants (SOCs). Waivers from monitoring can be granted. Of the 33 SOCs, 3 are California-specific (not federally regulated); violations for the California-specific SOCs are discussed in Section 3.4.

Table 9 Summary of Synthetic Organic Contaminates MCL Violations and PWS Counts

Contaminant	Violation Category	# of Violations	# of PWS
DBCP	MCL	9	3

During 2020, there were nine violations of the 1,2-Dibromo 3-Chloropropane (DBCP) MCL of 0.2 ug/L. The violations were incurred by two NTNC water systems (one in Fresno County and one in Tulare County) and one CWS (in Tulare County). DBCP is a banned nematicide that may still be present in soils due to runoff/leaching from former use on soybeans, cotton, vineyards, tomatoes, and tree fruit. Some people who use water containing DBCP in excess of the MCL over many years may experience reproductive difficulties and may have an increased risk of getting cancer.

3.1.3. Volatile Organic Contaminants (VOCs)

CWS and NTNC are required to comply with primary drinking water standards for 27 volatile organic contaminants (VOCs). In 2020, no MCL violations were reported for VOCs.

3.1.4. Radionuclide Rule

CWS and NTNC are required to meet primary drinking water standards for six alpha-emitting radionuclide contaminants regulated under the Radionuclide Rule. Monitoring for beta particle and photon radioactivity is required only if the Drinking Water Program determines that a source of water supply is vulnerable based on proximity to a nuclear facility. During 2020, there were 70 violations of radionuclide MCLs by 25 public water systems. All radionuclide MCL violations were for combined uranium.

Table 10 Summary of Radionuclide MCL Violations and PWS Counts

Contaminant	Violation Category	# of Violations	# of PWS
Combined Uranium	MCL	70	25

The major source of uranium in drinking water is from erosion of natural deposits. Some people who drink water containing uranium in excess of the MCL over many years may have kidney problems or an increased risk of getting cancer. The State Water Board has set the drinking water standard for uranium at 20 pCi/L to protect against the risk of these adverse health effects. USEPA has set a federal drinking water standard for uranium at 30 ug/L, which is equivalent to the state MCL.

3.1.5. Total Coliform Rule (TCR) and the Revised TCR (rTCR)

All public water systems are required to comply with the Total Coliform Rule (TCR), which specifies monitoring of the water in the distribution system for the presence of coliform bacteria. Coliforms are bacteria that are naturally present in the environment and are used as an indicator that other, potentially harmful bacteria may be present or that a potential pathway exists through which contamination may enter the drinking water distribution system.

CWS are required to collect samples ranging from one sample per month to 120 samples per week in the water distribution system, depending on the size of the PWS. NTNC and TNC systems are generally on a monthly or quarterly sampling frequency. Whenever samples are total coliform-positive, repeat samples must be collected at that location and in surrounding areas and analyzed for fecal coliform or *E. coli* bacteria. Fecal coliform and *E. coli* are bacteria whose presence indicates that the water may be contaminated with human or animal waste. Microbes in these wastes can cause short-term effects, such as diarrhea, cramps, nausea, headaches, or other symptoms. They may pose a special health risk for infants, young children, some of the elderly, and people with severely compromised immune systems.

A public water system is in violation of the TCR Total Coliform MCL when any of the following occurs:

- Monthly Total Coliform MCL (non-acute)
 - For a public water system which collects at least 40 samples per month, more than 5.0% of the samples collected during any month are total coliform-positive; or

- For a public water system which collects fewer than 40 samples per month, more than one sample collected during any month is total coliform-positive; or
- Acute Total Coliform MCL
 - Any repeat sample is fecal coliform-positive or *E. coli*-positive; or
 - Any repeat sample following a fecal coliform-positive or *E. coli*-positive routine sample is total coliform-positive.

The federal Revised Total Coliform Rule (rTCR) became effective on April 1, 2016, which replaced the TCR Monthly Total Coliform MCL with new Coliform Treatment Technique requirements and added a new *E. coli* MCL. The rTCR establishes a “find and fix” approach for investigating and correcting causes of coliform problems within water distribution systems. Since California had not revised the state’s TCR regulation to incorporate rTCR in 2020, DDW is regulating both the rTCR and the state TCR concurrently. Because violation of the monthly Total Coliform MCL is no longer reportable to USEPA, DDW tracks these as state violations. A summary of the TCR Monthly Total Coliform MCL violations is presented in Section 3.4.

A PWS is in violation of the rTCR *E. coli* MCL or Coliform Treatment Technique requirements when any of the following occurs:

- *E. coli* MCL (acute)
 - Same criteria as the existing Acute Total Coliform MCL conditions
- Coliform Treatment Technique
 - Failure to complete the required corrective action(s) within the specified timeframe after identifying a sanitary defect in a Level 1 or Level 2 assessment.
 - Failure to conduct the required assessment within 30 days after exceeding a treatment technique trigger.
 - Failure of a seasonal system to complete the drinking water primacy agency-approved start-up procedure prior to serving water to the public.

The federally reported rTCR MCL/TT violations for 2020 are summarized in the table below.

Table 11 Summary of Revised Total Coliform Rule Violations and PWS Counts

Rule	Violation Category	# of Violations	# of PWS
Revised TCR	<i>E. coli</i> MCL Violation	7	7
Revised TCR	TT – Level 1 Assessment	2	2
Revised TCR	TT – Level 2 Assessment	2	2
Revised TCR	TT – Failure to complete a seasonal start-up procedure	1	1
Total		12	12

Figure 14 shows that of the 12 PWS that incurred one or more rTCR MCL/TT violations in 2020, 67% of them were non-community water systems.

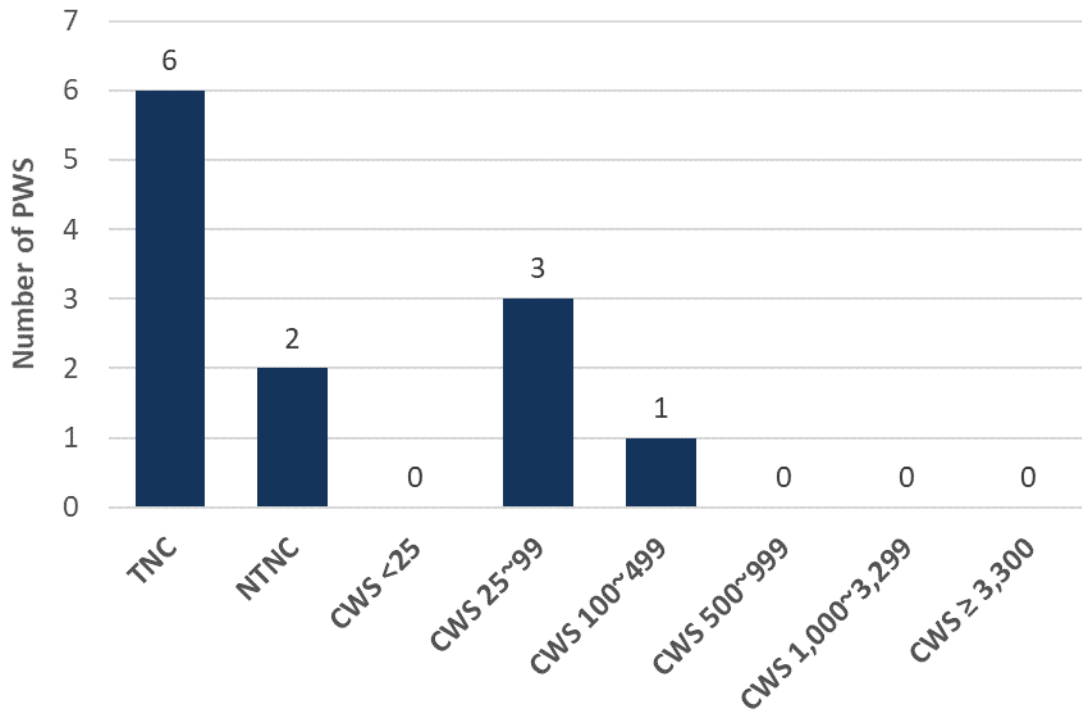


Figure 14 Number of PWS with rTCR MCL violations for each PWS type/CWS size

3.1.6. Disinfectants and Disinfection By-Products Rule (DBPR)

All CWS and NTNC that provide disinfected drinking water are required to comply with the Stage 1 and Stage 2 Disinfectants and Disinfection By-Products Rule (DBPR). Additionally, TNC that use chlorine dioxide are required to comply with the requirements for chlorine dioxide. The DBPR established MCLs for four by-products of drinking water disinfection - total trihalomethanes (TTHMs), haloacetic acids (HAA5), bromate, and chlorite; maximum residual disinfectant levels (MRDLs) for three disinfectants – chlorine, chloramine, and chlorine dioxide; TT requirements for the control of total organic carbon (TOC), a disinfection byproduct precursor in surface water sources using conventional surface water treatment; TT requirements for minimum disinfectant residual levels and TT requirements for certified treatment operators.

TTHMs and HAA5s are found primarily in some treated surface water systems but have been found to develop in some disinfected groundwater systems as well. Some people who drink water containing TTHMs in excess of the MCL over many years may experience liver, kidney or nervous system problems and may have an increased risk of getting cancer. HAA5 also present a cancer risk to some people who drink water containing concentrations in excess of the MCL over many years. Some infants and young children who drink water containing chlorite in excess of the MCL could experience nervous system effects. Similar effects may occur in fetuses of pregnant women who drink water containing chlorite in excess of the MCL. Some people may experience anemia if drinking water containing excess chlorite.

The DBPR MCL and TT violations are summarized in the Table 12 below. In 2020, 50 PWS incurred MCL and TT violations, including 118 MCL/MRDL violations and 6 TT violations. Seven PWS violated both TTHM and HAA5 MCLs in 2020.

TTHM and HAA5 MCL violations occur when the locational running annual average exceeds the MCL. The determination of a chlorite MCL violation is complex and can occur under a combination of the following scenarios: whether an entry point sample exceeded the MCL, whether a routine or triggered distribution system sample exceeded the MCL, whether confirmation samples were collected or whether they confirmed the original sample result, and whether consecutive entry point samples exceeded the MCL.

Table 12 Summary of Disinfection By-Products Rule Violations and PWS Counts

Rule	Violation Category	# of Violations	# of PWS
DBPR	MCL – Haloacetic Acids (HAA5)	50	22
DBPR	MCL – Total Trihalomethanes (TTHM)	67	24
DBPR	MCL - Chlorite	1	1
DBPR	TT – Inadequate Precursor Removal, Total Organic Carbon	3	1
DBPR	TT – Qualified Operator Failure	3	2
Total		124	38 (a)

(a) The total number of PWS is less than the sum of the PWS of each contaminant/rule listed, since a PWS may have violations of more than one violation category.

As a requirement of the DBPR, California is required to maintain a water treatment operator certification program for PWS using a surface water source or a groundwater source under the direct influence of surface water. There were three violations of these operator certification requirements in 2020. California additionally requires certified water treatment operators for PWS that provide groundwater treatment and requires all CWS and NTNC to be operated by certified distribution operators. California maintains a distribution operator certification program in addition to a treatment operator certification program.

Figure 15 shows that NTNC and CWS serving less than 500 connections accounted for 68% of the total number of PWS that had DBPR MCL/TT violations in 2020.

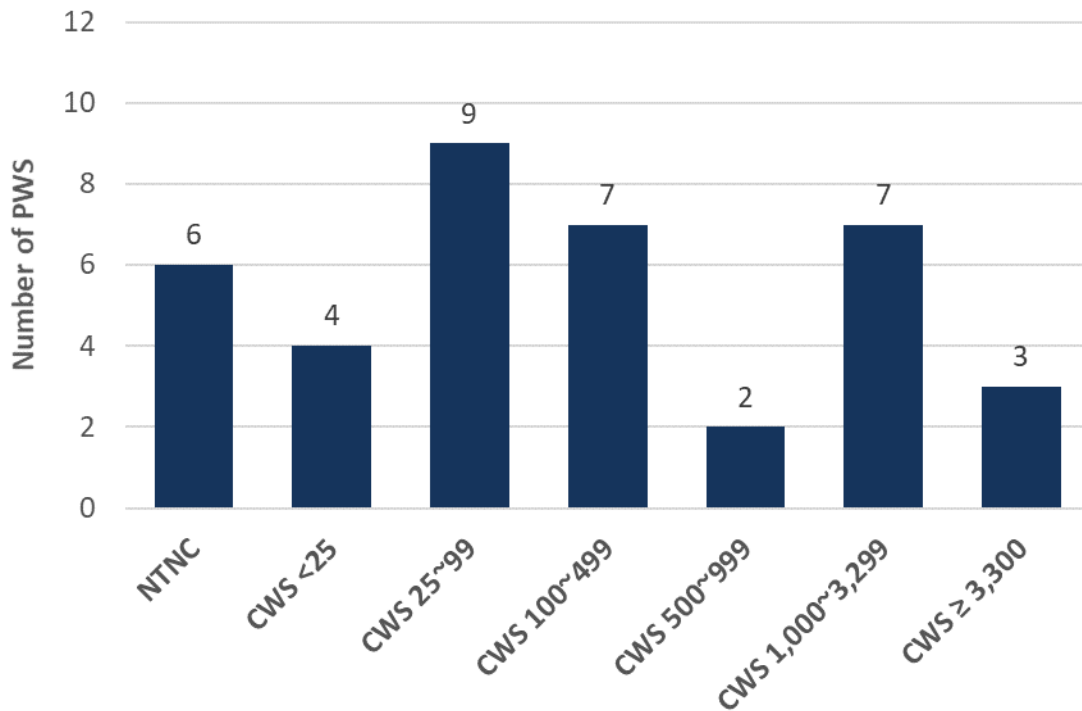


Figure 15 Number of PWS with DBPR MCL/MRDL/TT violations for each PWS type/CWS size

3.1.7. Surface Water Treatment Rules

The surface water treatment rules include the Surface Water Treatment Rule (SWTR), Interim Enhanced Surface Water Treatment Rule (IESWTR), Long-term 1 Enhanced Surface Water Treatment Rule (LT1ESWTR), Long-term 2 Enhanced Surface Water Treatment Rule (LT2ESWTR), and the Filter Backwash Rule. These rules establish monitoring and reporting requirements, treatment techniques, performance standards, and turbidity standards to be met by public water systems using surface water as a drinking water source. As used in this report, the term “surface water” also includes groundwater that has been determined to be under the direct influence of surface water (GWUDI).

Treatment techniques and performance standards are used to establish water quality objectives instead of MCLs for microbiological contaminants that may be found in surface waters, including *Giardia lamblia*, *Cryptosporidium parvum*, Legionella, heterotrophic plate count bacteria, and viruses. Public water systems that use surface water are required to provide multiple levels of treatment

(termed ‘multi-barrier’ treatment) to protect against adverse health effects from microbiological contaminants. All multi-barrier treatment systems must include the use of an approved filtration technology as a first barrier, and a reliable disinfection system as a second barrier. Some PWS can avoid filtration by meeting special requirements including rigorous standards on their source water quality and watershed controls. These PWS must still disinfect their water.

The following table summarizes the TT violations of the surface water treatment rules. In 2020, 13 PWS incurred 103 treatment technique violations of the surface water treatment rules, such as failure to meet the turbidity requirements for filtration or failure to provide the required level of disinfection treatment.

Table 13 Summary of Surface Water Treatment Rules Violations and PWS Counts

Rule	Violation Category	# of Violations	# of PWS
SWTR	TT - Failure to install filtration	101	11
LT2ESWTR	TT –Failure to provide LT2 treatment	1	1
IESWTR	TT- Uncovered storage facility	1	1
Total		103	13

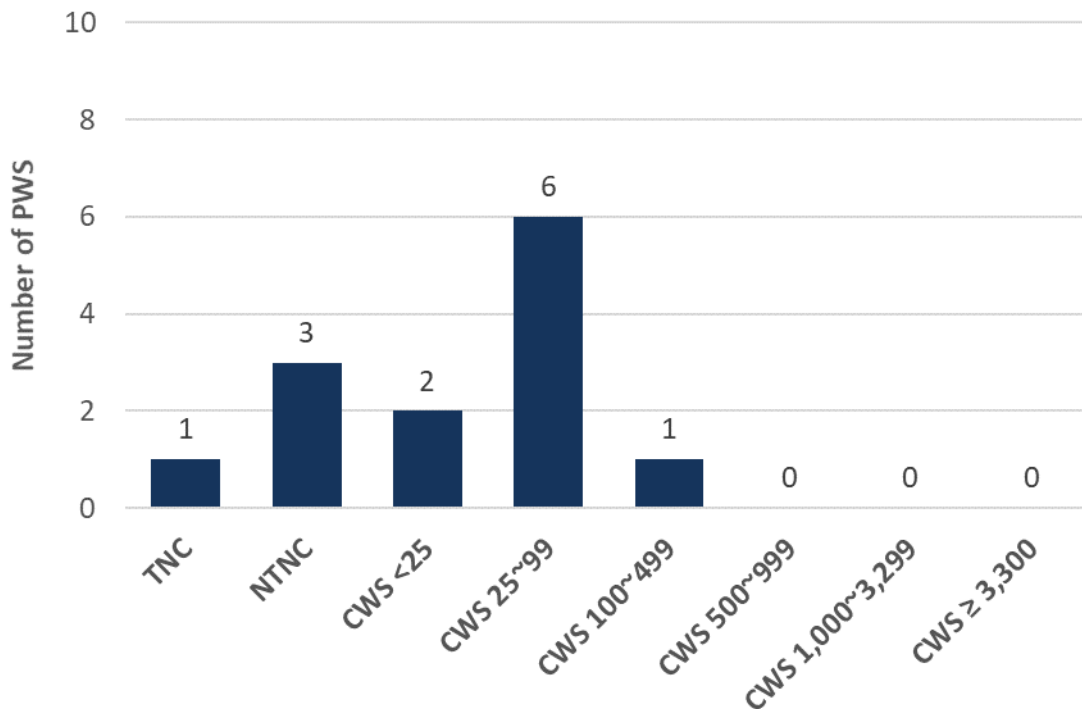


Figure 16 Number of PWS with SWTR TT violations for each PWS type/CWS size

Figure 16 shows that 100% of PWS that incurred SWTR TT violations in 2020 were noncommunity water systems and CWS serving less than 500 connections.

3.1.8. Groundwater Rule

All public water systems that use groundwater, such as wells or springs, must comply with the Groundwater Rule (GWR) to reduce the occurrence of disease associated with microorganisms in drinking water derived from groundwater. The GWR establishes a risk-based approach to target groundwater systems that are vulnerable to fecal contamination. Groundwater systems that are identified as being at risk of fecal contamination must take corrective action to reduce potential illness from exposure to microbial pathogens.

Special monitoring of the groundwater source for a fecal indicator microorganism must be conducted whenever a sample collected in the water distribution system pursuant to the rTCR is positive for total coliform (triggered source monitoring). California has chosen to use *E. coli* monitoring as the indicator of fecal contamination. A summary of MCL and TT violations of the GWR, such as failure to provide the required level of virus inactivation treatment, is provided below:

Table 14 Summary of Groundwater Rule Violations and PWS Counts

Rule	Violation Category	# of Violations	# of PWS
Groundwater Rule	TT – Failure to provide treatment	1	1
Groundwater Rule	TT - Failure to address deficiency	1	1
Total		2	2

3.1.9. Lead and Copper Rule

All CWS and NTNC must comply with the Lead and Copper Rule (LCR). The LCR requires that “first draw” tap samples be collected for lead and copper analysis from sites (typically single family homes or multi-family residences for CWS) that are at risk of containing lead pipes or copper pipe with lead solder, or which may be served by a lead service line. Samples are often collected by the occupants who live at the residences prioritized for sampling. PWS are required to collect the samples from sites that meet the site selection criteria, send the samples to a certified laboratory for analysis, and report the results to DDW and the occupant of each residence sampled.

The action level for lead is 0.015 mg/L, and copper has an action level of 1.3 mg/L, based on the 90th percentile concentration in all samples collected during a sampling period. For each monitoring compliance period, PWS must determine the 90th percentile lead and copper concentration calculated based on the results of all samples collected and determine whether the action levels for lead and copper are met. A finding that the 90th percentile lead or copper level is at a concentration above their respective action levels is not in itself a violation, but it triggers actions that PWS must take - the PWS must take specified steps to evaluate the need for corrosion control treatment, including conducting an optimal corrosion control treatment (OCCT) study and/or a source water treatment (SOWT) study, and implementation of study recommendations. A PWS must replace lead service lines if it fails to install treatment or if the treatment fails to control lead levels. For lead action level exceedances, PWS must conduct public education on the effects of lead and the ways that the public can reduce lead exposure.

The following table summarizes the LCR TT violations recorded for 2020. The two PWS with lead violations in 2020 are both community water systems with less than 500 service connections.

Table 15 Summary of Lead and Copper Rule Violations and PWS Counts

Rule	Violation Category	# of Violations	# of PWS
LCR	TT – Failure to install or demonstrate Optimal Corrosion Control (OCCT) or Source Optimal Water Treatment (SOWT)	2	2

Lead is generally present in drinking water as a result of internal corrosion of household plumbing or from lead service lines. It may also be present in source waters due to discharges from industrial manufacturers or erosion of natural deposits. Infants and children who drink water containing lead at concentrations above the action level may experience delays in their physical or mental development. Children may show slight deficits in attention span and learning abilities. Adults who drink water with lead above the action level over many years may develop kidney problems or high blood pressure.

The major sources of copper in drinking water are from internal corrosion of household plumbing systems, erosion of natural deposits, and leaching from wood preservatives. Copper is an essential nutrient, but some people who drink water containing copper in excess of the action level over a relatively short amount of time may experience gastrointestinal distress. Some people who drink water containing copper in excess of the action level over many years may suffer liver or kidney damage. People with Wilson’s Disease should consult their personal doctor.

Figure 17 below shows that LCR TT violations were incurred by PWS across the type and size ranges in 2020.

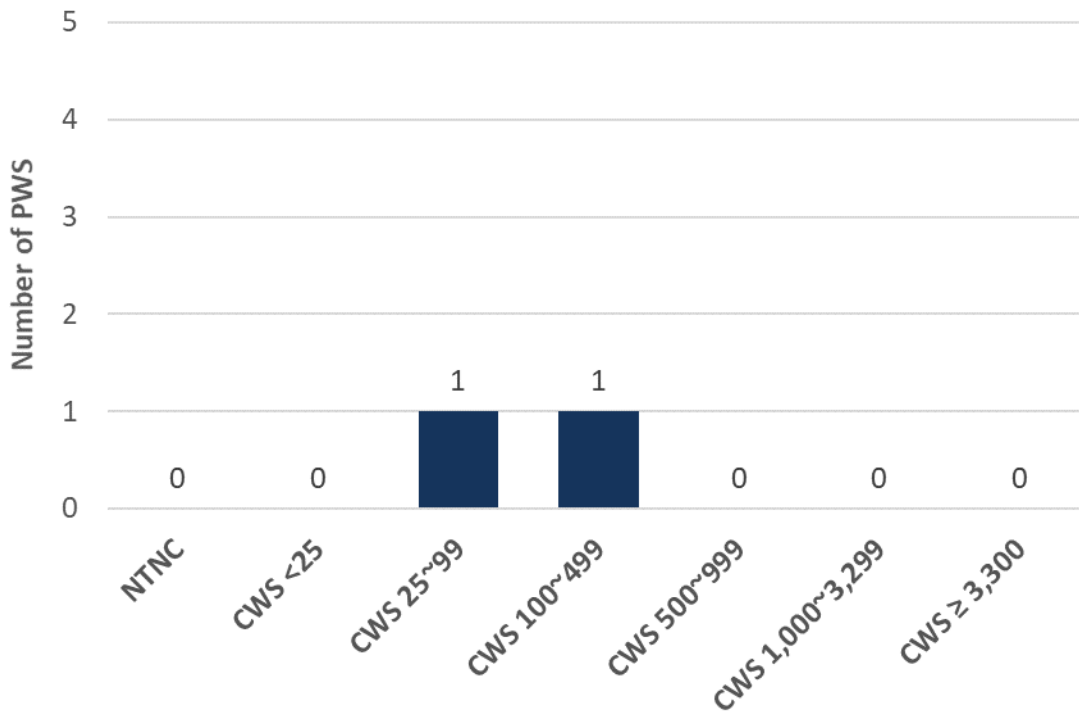


Figure 17 Number of PWS with LCR TT violations for each PWS type/CWS size

3.2. Federal Public Notification, Consumer Confidence Report, Monitoring, and/or Reporting Violations

3.2.1. Public Notification

Public water systems are required to notify the people that are served by the water system whenever a violation of a drinking water standard occurs. Public notices are required to be issued immediately, usually within 24 hours, for violations of MCLs for contaminants with acute (short term) health effects. Examples of these include violation of the *E. Coli* MCL, violation of the nitrate, nitrite, or combined nitrate and nitrite MCL, or violation of the perchlorate MCL. Public notices are issued for violations of drinking water standards for contaminants with chronic (long term) health effects, as soon as possible, usually within 30 days. Examples of these include violations of MCLs for arsenic, radioactivity or organic chemicals. A violation occurs when there is a failure to

provide the required notice to the public within the required time frame. There was one violation for failure to provide the required notice to the public in 2020.

3.2.2. Consumer Confidence Report Violations

CWS and NTNC are required to provide to their customers a report each year of the quality of the water served by their water system during the prior calendar year. Each year’s Consumer Confidence Report (CCR) must also include information on the source(s) of drinking water, the levels of any detected contaminants, and compliance with drinking water regulations. Public water systems must describe any violations of the water quality standards in the CCR.

In 2020, 29 public water systems incurred violations for failure to prepare and distribute its CCR to its customers.

Table 16 Summary of Consumer Confidence Report Violations and PWS Counts

Rule	Violation Category	# of Violations	# of PWS
CCR	Failure to prepare and deliver a CCR	38	29

Figure 18 below shows that 97% of CCR violations were incurred by NTNC and CWS serving less than 500 connections.

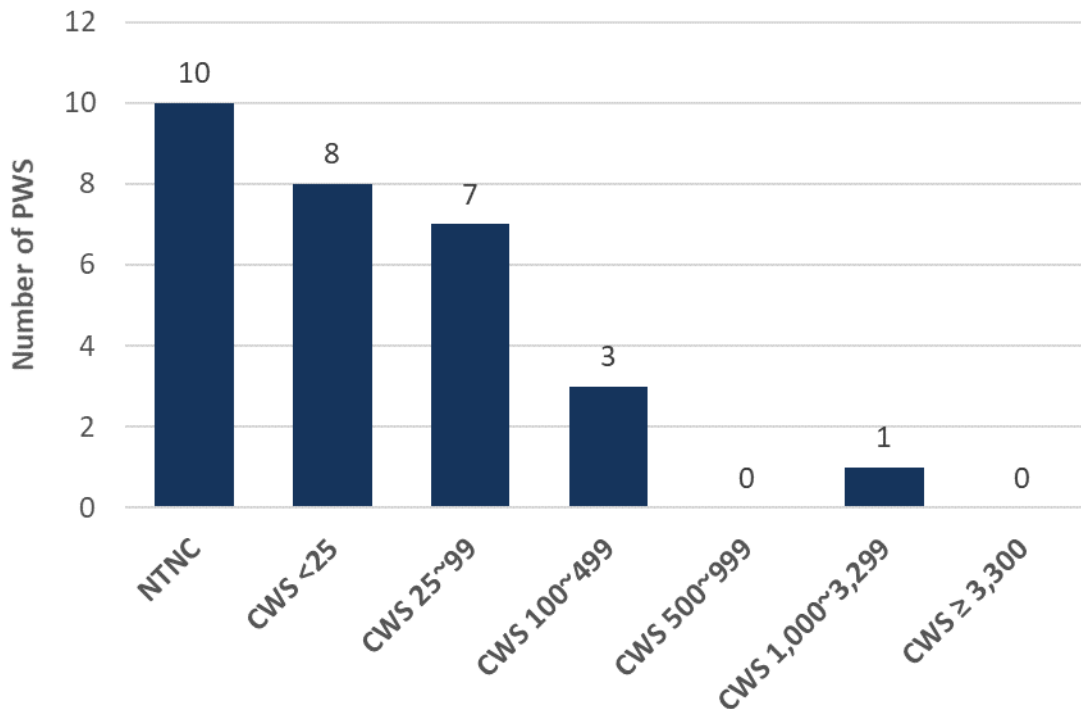


Figure 188 Number of PWS with CCR violations for each PWS type and CWS size

3.2.3. Monitoring and/or Reporting Violations

The PWS are required to monitor the water for specified contaminants at required frequency and report the results to the State. Generally, the larger the population served by a water system, the more extensive and frequent are the monitoring and reporting (M/R) requirements. Finally, the State requires PWS to notify their consumers when they have violated these regulations. The 1996 Amendments to the SDWA among other items require consumer notification to include a clear and understandable explanation of the nature of the violation, its potential adverse health effects, steps that the PWS is undertaking to correct the violation and the possibility of alternative water supplies during the violation.

In 2020, 465 PWS incurred federal monitoring and/or reporting violations as shown in Table 17.

Table 17 Summary of Monitoring and/or Reporting Violations and PWS Counts by Rule

Rule	Violation Category	# of Violations	# of PWS
DBPR	MON	26	17
GWR	MON/RPT	11	11
IOC	MON	111	84
LCR	RPT	275	161
RAD	MON	5	2
RTCR	MON/RPT	277	190
SOC	MON	12	3
SWTR	MON	10	4
VOC	MON	3	3
Total		730	465 (a)

(e) The total number of PWS is less than the sum of the PWS of each rule listed, since a PWS may have violations of more than one contaminant

3.3. Variance and Exemption Violations

The State Water Board is authorized under the federal SDWA to issue variances and exemptions from meeting drinking water standards to PWS under special circumstances. Four PWS incurred a violation of a variance or exemption in 2020 as shown in Table 18.

Table 18 Summary of Variance and Exemption Violations and PWS Counts

Violation Category	# of Violations	# of PWS
V/E	7	4

3.4. California-Specific MCL Violations

All CWS and NTNC are required comply with primary drinking water standards contained in Title 22 California Code of Regulations. Contaminants with primary MCLs regulated by California but not regulated by USEPA include the following:

Inorganic Contaminants:

- Perchlorate
- Aluminum
- Nickel

Synthetic Organic Contaminants

- Bentazon
- Molinate
- Thiobencarb
- 1,2,3-Trichloropropane

Volatile Organic Contaminants

- Methyl tert-butyl Ether (MTBE)
- 1,1-Dichloroethane
- 1,3-Dichloropropene
- 1,1,2,2-Tetrachloroethane
- Trichlorofluoromethane
- 1,1,2-Trichloro-1,2,2-trifluoroethane

In 2020, about 432 violations were incurred by public water systems for failing to meet an MCL of a California-regulated contaminant. The table below summarizes the violations of a primary MCL or secondary MCL for California regulated contaminants (see section 1.8 for list of the contaminants).

Table 19 Summary of California-Specific MCL Standards Violations and PWS Counts

Contaminant/Rule	Violation Category	# of Violations	# of PWS
1,2,3-TCP	Primary MCL	301	70
CA TCR	Monthly Total Coliform MCL	102	87
Perchlorate	Primary MCL	4	1
Iron	Secondary MCL	5	3
Manganese	Secondary MCL	20	6
Total		432	164 (a)

(a) The total number of PWS is less than the sum of the PWS of each contaminant/rule listed, since a PWS may have violations of more than one violation category

1,2,3-Trichloropropane (123TCP) The State Water Board established an MCL for 123TCP of 0.005 ppt (ug/L) on December 14, 2017. All CWS and NTNC must comply with the new 123TCP drinking water standards. These water systems started conducting initial monitoring of their sources in first quarter 2018.

123TCP is used as an industrial solvent, paint and varnish remover, and cleaning and degreasing agent. It is also a byproduct of the production of pesticides and other compounds and was an impurity and inactive ingredient of soil fumigant pesticides historically used in California. The major sources of 123TCP in drinking water include runoff/leaching of soil fumigant pesticides applied on agricultural lands and leaching from hazardous waste sites. Some people who drink water containing 123TCP in excess of the MCL over many years may have an increased risk of getting cancer.

In 2020, 70 PWS incurred 301 violations of the 123TCP MCL. Figure 19 summarizes the number of CWS and NTNC that incurred one or more MCL violations for 123TCP in 2020. It shows that 86% of PWS that incurred MCL violations were NTNC or small CWS serving less than 500 connections.

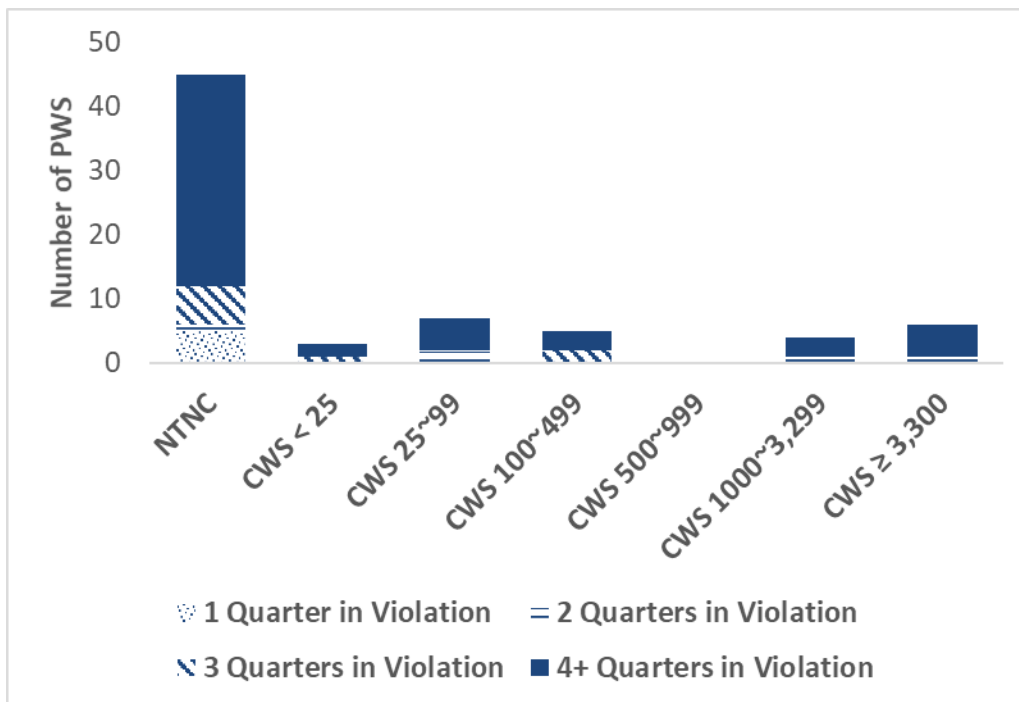


Figure 19 Number of PWS with 123TCP MCL violations per type/CWS size

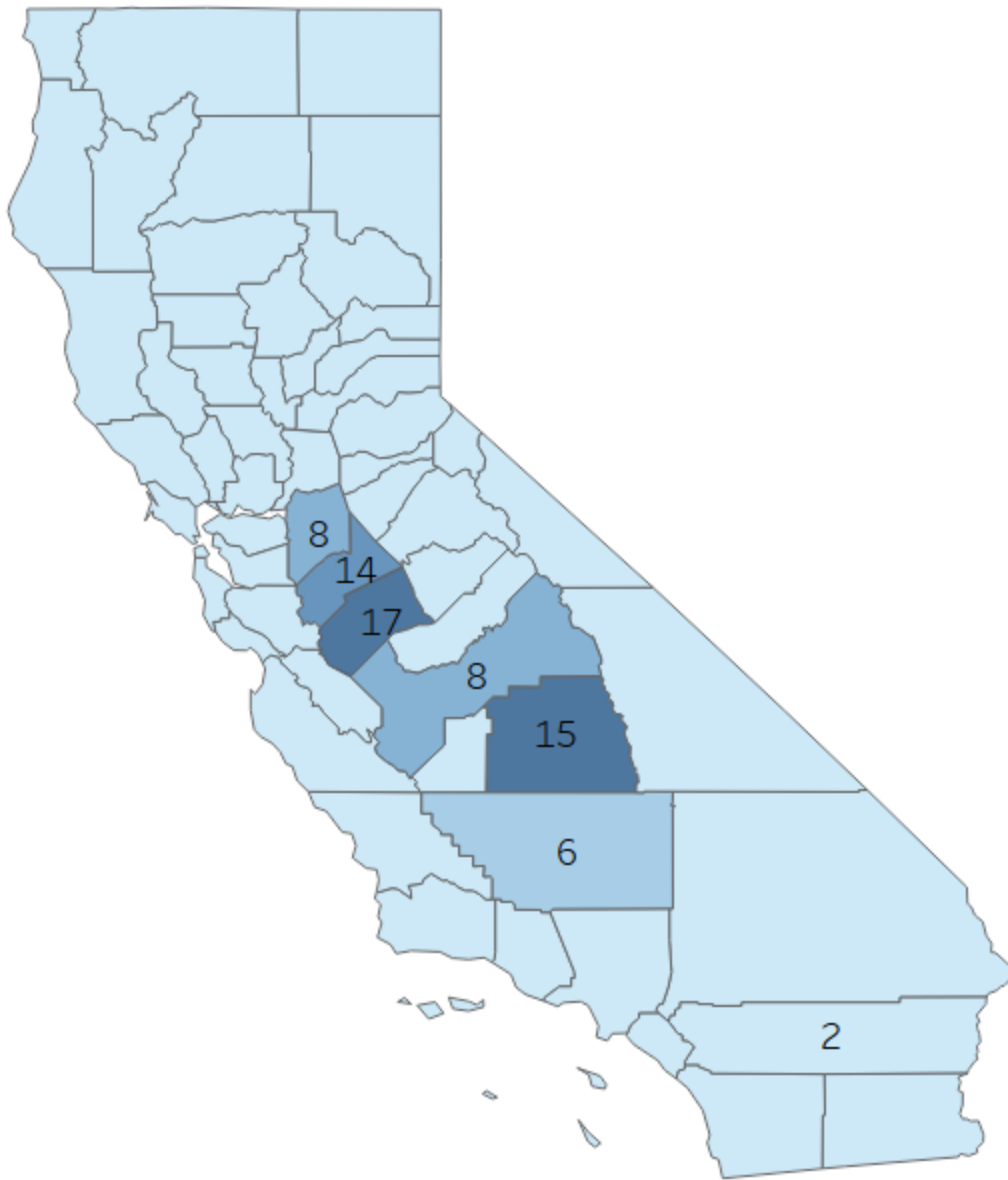


Figure 20 The number of PWS with 123TCP MCL violations in each county

Figure 20 shows a map of all counties with the number of PWS in each county that exceeded the 123TCP MCL in 2020.

Figure 21 shows the duration of 123TCP violations recorded in 2020. Fifty-one (51) PWS incurred 123TCP MCL violations in every quarter in 2020, down from 95 PWS in 2019. Nineteen (19) PWS incurred 123 TCP MCL violations in less

than four quarters in 2020. Fourteen (14) of these PWS are participating in funding projects with the State Water Board to address the 123TCP problem.

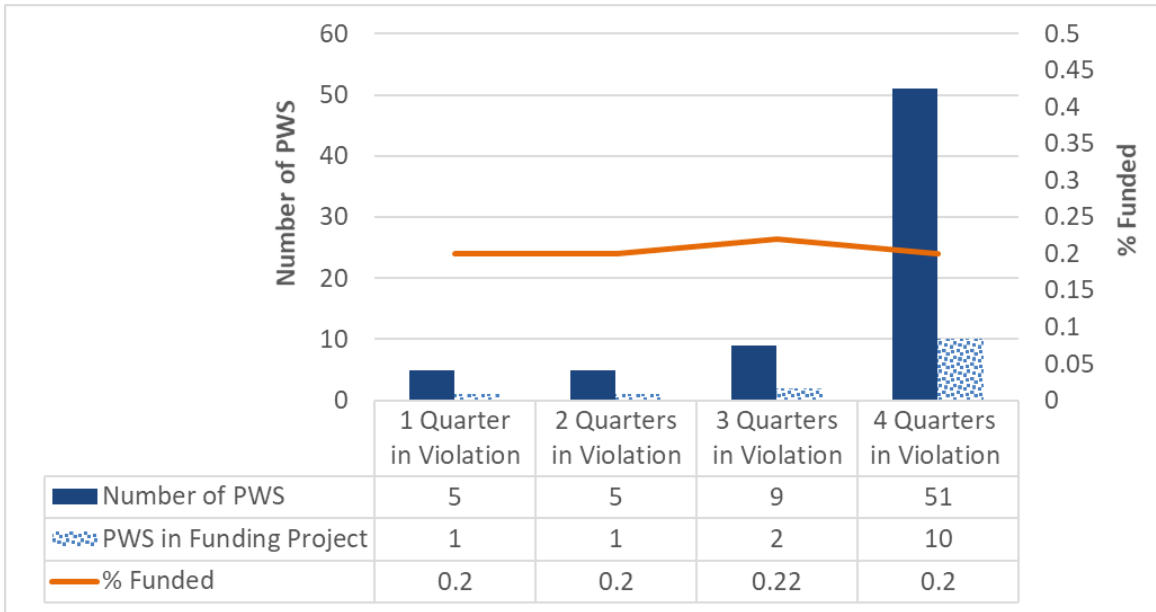


Figure 21 Number of PWS with 123TCP MCL violations and the duration of the violation.

CA TCR As discussed in Section 2.1 and Section 3.1.5, the Drinking Water Program tracked violations for both the rTCR and TCR because California’s TCR regulations have not yet been updated to reflect the rTCR. Violations of the monthly Total Coliform MCL are no longer reported to USEPA, so DDW tracks these as state violations. 102 monthly TCR MCL violations were incurred by 87 PWS in 2020.

Perchlorate –In 2020, one PWS incurred violation of Perchlorate MCL for all four quarters. This PWS is an NTNC in Tulare County; it also violated the perchlorate MCL for all four quarters in 2019 and 2018.

The major sources of perchlorate in drinking water are solid rocket propellants, fireworks, explosives, flares, matches, and a variety of industries. Perchlorate usually gets into drinking water as a result of environmental contamination from historic aerospace or other industrial operations that use, store, or dispose of perchlorate and its salts. Perchlorate's interference with iodide uptake by the thyroid gland can decrease production of thyroid hormone, which is needed for prenatal and postnatal growth and development, as well as for normal metabolism and mental function in the adult.

3.5. State-Specific Monitoring and/or Reporting and Other Violations

There are 370 violations of California-specific monitoring, reporting and other violations in 2020, as listed in Table 20.

Table 20 Summary of California-Specific Monitoring and/or Reporting and Other Violations by Rule

Rule	Violation Category	# of Violations	# of PWS
Secondary Standards	MON	11	2
California Total Coliform Rule (TCR)	MON	50	48
Volatile Organic Contaminants (VOC)	MON	35	35
Cross-Connection Control (CC)	OTHR	4	4
Annual Report (AR)	OTHR	164	156
Permit, operating without a permit (PT)	OTHR	5	5
Operator Certification (OP)	OTHR	16	16
Reporting Requirement (RR)	OTHR	12	12
Treatment Technique (T1)	TT	12	8
Permit, violation of provision (PP)	OTHR	39	31
Waterworks Standards (WW)	OTHR	22	19
Total		370	320 (a)

(a) The total number of PWS is less than the sum of the PWS of each rule listed, since a PWS may have violations of more than one violation category.

Chapter 4. Enforcement Activities

DDW and LPAs take enforcement actions when a PWS violates an MCL or treatment technique or fails to conduct the required monitoring and reporting activities.

Enforcement action is an essential element of the DDW's regulatory program to bring all public water systems into full compliance with drinking water standards and regulations to ensure that the public receives a safe and reliable supply of drinking water. Carrying out an enforcement program is a requirement of the primacy delegation from USEPA. DDW may take a variety of enforcement actions depending on the type of violation and recurrence of a violation that includes both formal and informal enforcement actions. Issuance of progressively more stringent enforcement actions is the means used to bring a non-responsive water system into compliance with drinking water standards.

DDW's enforcement strategy for public water systems that violate a primary drinking water MCL includes issuance of formal enforcement actions in a timely manner. The California Health and Safety Code (CHSC) section 116655(a) specifies that whenever the State Water Board determines that any person has violated or is violating the California SDWA or any permit, regulation, or standard issued or adopted pursuant to the California SDWA, the director may issue an order doing any of the following:

- (1) Directing compliance forthwith;
- (2) Directing compliance in accordance with a time schedule set by the State Water Board;
- (3) Directing that appropriate preventive action be taken in the case of a threatened violation.

Per CHSC section 116655(b), an order that DDW issues may include, but not be limited to, the following requirements:

- (1) That the existing plant, works, or system be repaired, altered or added to;
- (2) That purification or treatment works be installed;
- (3) That the source of water supply be changed;

- (4) That no additional service connection be made to the system;
- (5) That the water supply, the plant, or the system be monitored;
- (6) That a report on the condition and operation of the plant, works, system, or water supply be submitted to the State Water Board.

Formal enforcement actions available to DDW include citations, compliance orders, permit amendments, and revocation or suspension of an existing operating permit. The CHSC also authorizes assessing civil penalties up to \$25,000 per day for each day a drinking water standard violation occurs or placing a water system into receivership. DDW has implemented an enforcement strategy that includes the requirement for the PWS to submit a compliance plan within a short time frame that achieves compliance within a specified time period. Failure to achieve compliance within that time period may result in escalated enforcement, including issuance of civil penalties.

4.1. Enforcement Actions Taken

In 2020, the Drinking Water Program issued 1,884 enforcement actions to public water systems for failing to comply with regulations. An enforcement action can be a notice of violation, a citation, or a compliance order. An enforcement action can address one or more violations, and prescribe public notification requirements as necessary, corrective actions and deadlines that the public water system must meet, in order to return to compliance (RTC).

Figure 22 and 23 show the number of federal and state violations, respectively, that were addressed by an enforcement action. Of the 2,393 violations (combined federal and state violations) that occurred in 2020, records show that over 78% were addressed with an enforcement action. Most of the unaddressed violations are associated with the state regulated 1,2,3-TCP and the federal regulated Lead and Copper Rule.

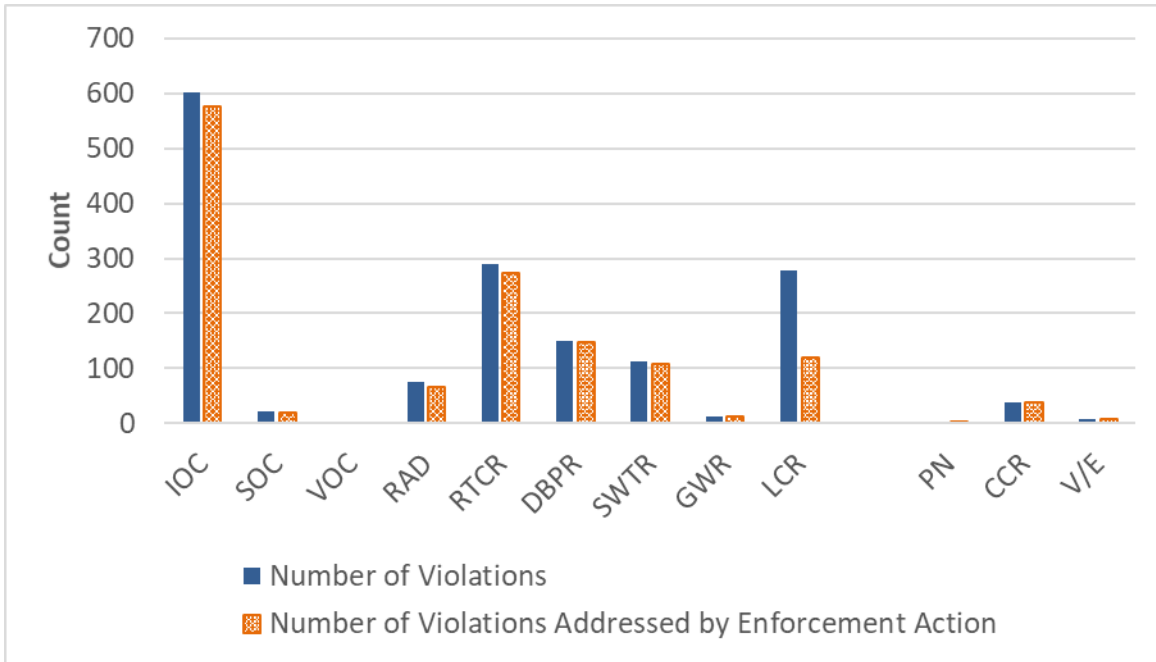


Figure 22 Number of federal violations that were addressed with an enforcement action

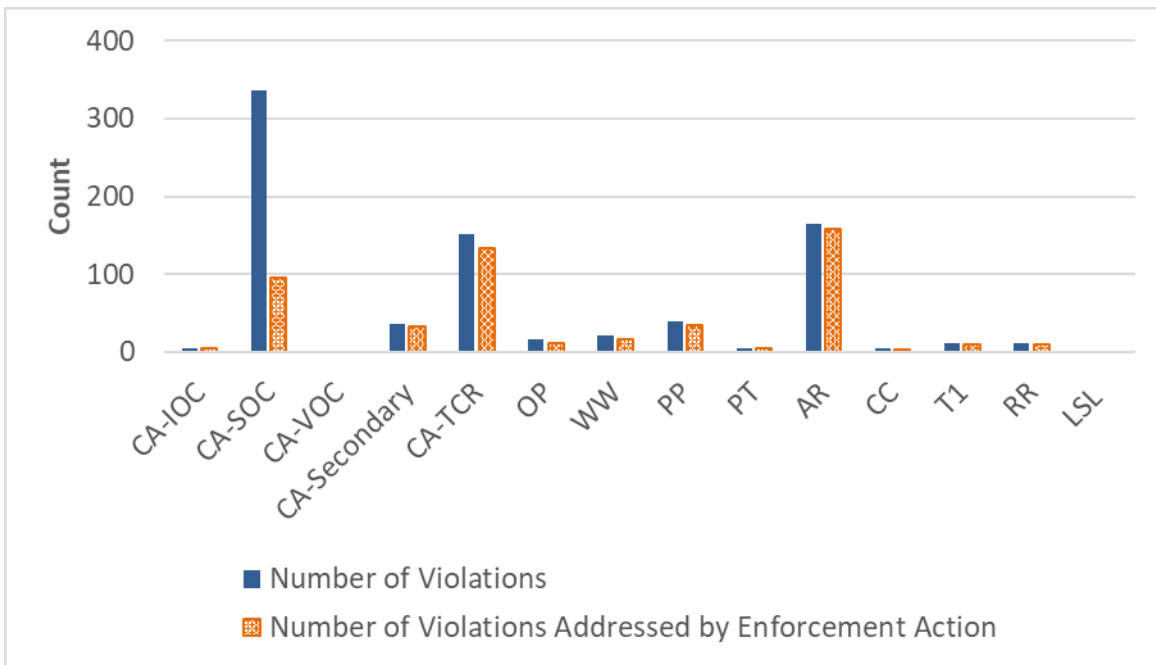


Figure 23 Number of state violations that were addressed with an enforcement action

4.2. Enforcement Targeting Tool (ETT)

In 2009, USEPA implemented a new approach designed to identify public water systems that are in significant non-compliance. An Enforcement Targeting Tool (ETT) was developed to prioritize public water systems that have incurred health-based violations and those that show a history of violations across multiple rules. An ETT score is calculated based on points assigned to the various types of violations, the severity of the violation (e.g., higher points are assigned for violations of drinking water standards associated with acute health effects than those associated with chronic health effects) and the duration of the violation. Public water systems with an ETT score of 11 or greater are prioritized for evaluation of enforcement strategy and resources required to ensure a return to compliance.

DDW coordinates with USEPA to track the ETT scores and has reduced the number of PWS that are identified as significant non-compliers. It was found that many violation records were not routinely updated after a PWS has returned to compliance, and this contributed to high ETT scores. DDW continues to work to ensure accurate and timely updates of inventory data for violations and enforcement actions, so that the ETT score accurately reflects the PWS that are significant non-compliers.

4.3. Return to Compliance

When a PWS exceeds a drinking water standard, the Drinking Water Program issues enforcement actions that prescribe what must be done in order for the PWS to return to compliance (RTC). The criteria for when RTC is achieved may depend on the rule, type of violation, and contaminant. As an example, for an MCL violation of a chemical with chronic health effects, RTC is achieved when the PWS stops providing water that exceeds the MCL, issues the public notification, and submits the information required in the enforcement action, such as a corrective action plan. PWS may inactivate the source that exceeds the MCL, provide an alternate source of water that complies with drinking water standards, or provide reliable treatment such that the treated source of supply complies with the MCL. Depending on factors such as the technical, managerial, and financial capacity (TMF) and resiliency of the public water system, the MCL violation can be resolved in a manner of days or it can take years. PWS that remain out of compliance with the MCL are typically required to provide regular

public notification and conduct increased monitoring until such time that the PWS returns to compliance with the MCL. Failures to conduct monitoring and public notification resulting from an MCL violation are also considered violations. Many violations on record are not consistently updated in the database even though the violations may have been resolved. DDW continues to work on ways to efficiently conduct data maintenance activities.

Figure 24 shows the number of PWS of each classification and CWS system size that have returned to compliance in 2020 following an MCL/TT violation that was incurred in 2020 or prior years. Overall, 12% of PWS that incurred an MCL/TT violation returned to compliance in 2020.

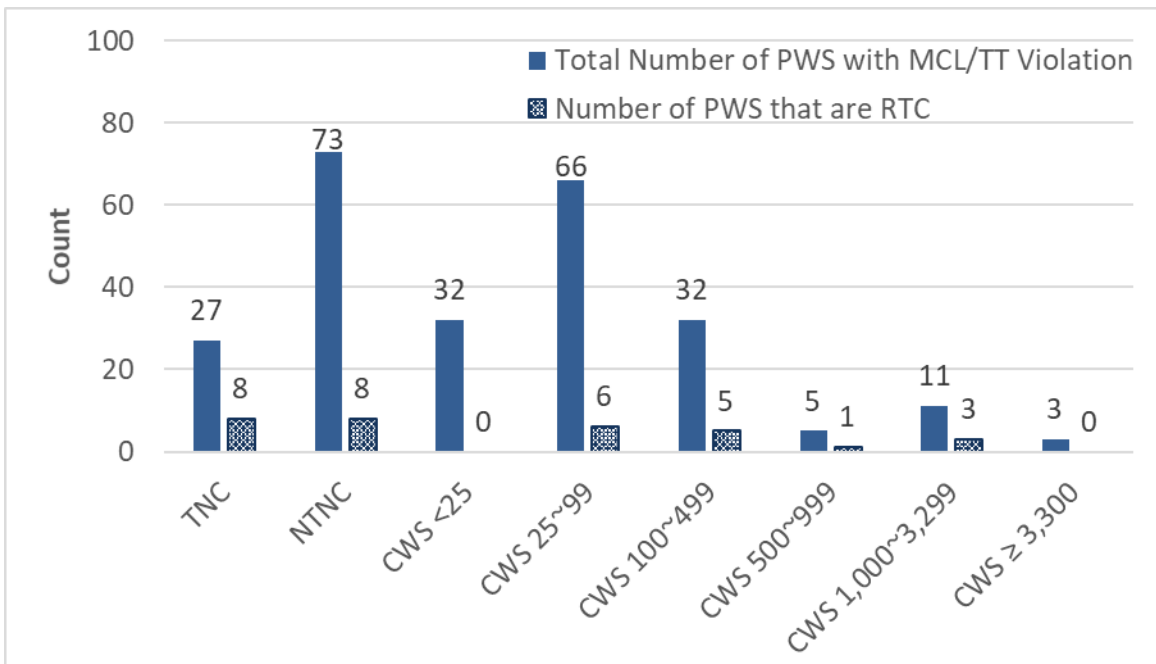


Figure 19 Number of PWS that returned to compliance in 2019 for an MCL/TT violation

For monitoring and reporting violations, the criteria for when RTC is achieved is generally when the delinquent samples are collected, when the report is submitted, or when the results reported to the State Water Board. Depending on the rule, RTC can be achieved within a month; for rules such as the Lead and

Copper Rule, where sampling must occur in specific periods of the year, delinquent samples may not be collected for several months.

Figure 25 below shows the number of PWS of each classification and CWS system size that have returned to compliance in 2020 following a monitoring or reporting violation that was incurred in 2020 or prior years. Overall, 35% of PWS that incurred a monitoring/reporting violation returned to compliance in 2020.

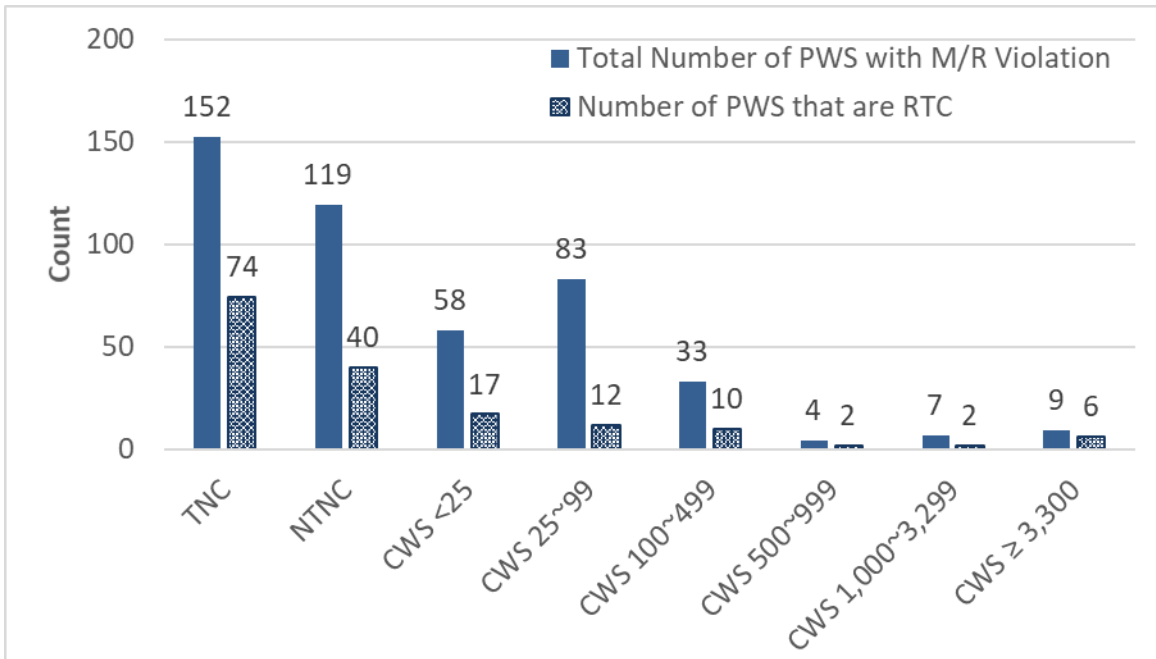


Figure 20 Number of PWS that returned to compliance in 2019 for M/R violations

The rate of RTC is generally higher for monitoring and reporting violations than MCL/TT violations. Often the SDWIS-State records are not regularly updated to reflect when a PWS has returned to compliance for a monitoring violation. DDW recently resumed a limited process to correct data validation errors and update inventory records, including violations records in SDWIS-State, to ensure that the compliance status of PWS as recorded in SDWIS-State is consistent with the compliance status determined by the local DDW and LPA staff. DDW continues to work to improve data procedures and data systems in order to ensure timely reporting of accurate compliance information for PWS in SDWIS-State.

Chapter 5. Conclusion

The State Water Board is the primacy agency responsible for the administration and enforcement of the SDWA requirements in California. The implementation of the program includes a range of activities and authorities including issuing operating permits, conducting inspections, monitoring for compliance with regulations, and taking enforcement action to compel compliance when violations are identified.

Overall, water systems in California have a high rate of compliance with drinking water standards. However, many public water systems continue to incur water quality violations as a result of contamination of drinking water sources. Arsenic and nitrate continue to impact communities in the state.

The State Water Board continues to track compliance, take enforcement actions to address violations, provide technical assistance to public water systems to address violations, provide funding assistance to public water systems that are capable of undertaking planning or construction projects in order to address violations, and compel public water systems that do not have adequate technical, managerial, and financial capacity to provide reliable and safe drinking water to its customers to consolidate with other public water systems that are able to provide safe drinking water.

5.1. Drinking Water Program Compliance Activities for 2020

DDW has planned a number of activities and projects that will ultimately improve the reporting of violations and enforcement actions, improve data quality, as well as assist in returning PWS to compliance after a violation has occurred.

DDW began updating the 2020 Safe Drinking Water Plan in 2018 and released the draft 2020 Safe Drinking Water Plan for public comment and held multiple public workshops in 2021. The 2020 Safe Drinking Water Plan was revised based on the comments received and will be going to the Board for approval in September 2021. The Safe Drinking Water Plan is a comprehensive assessment of drinking water in California which covers the quality and safety, types of problems that need to be addressed, overall health risks, current and projected costs, and current regulatory programs. The plan will contain specific

recommendations to address issues identified and improve the overall quality and safety of California's drinking water.

DDW implemented new initiatives to address unsustainable public water systems, including mandatory water system consolidations and preventative measures to stop the establishment of unsustainable PWS. The State Water Board established the new Safe and Affordable Funding for Equity and Resilience (SAFER) Section under the Resiliency and Data Branch, a Safe and Affordable Drinking Water Section under the Division of Financial Assistance (DFA) Office of Sustainable Water Solutions, and one under DFA's Grants/Op-Cert/Administration Branch, for a total of more than 75 new positions in the State Water Board to meet the goals of safe, accessible, and affordable drinking water for all Californians. Information about SAFER is available on the webpage here <https://www.waterboards.ca.gov/safer/>.

DDW's Quality Assurance Section (QAS) was moved under the DDW Resiliency and Data Branch and continues to improve the quality of data that DDW receives from laboratories and PWS, and the quality of the inventory data that DDW maintains in SDWIS-State. The Data Management Unit within QAS continues to develop tools to increase efficiency in routine data cleanup activities to ensure data quality. The Program Liaison Unit within QAS continues to coordinate with LPAs to ensure accurate and timely reporting of compliance data, and data cleanup.

DDW continues to work on a multi-year project to modernize the SDWA compliance data management system and integrate a multitude of compliance tracking tools into a single system.

5.2. Obtaining a Copy of the Report

A copy of this Annual Compliance Report is available from DDW's webpage at https://www.waterboards.ca.gov/drinking_water/certlic/drinkingwater/Publications.html. You may also contact DDW at (916) 449-5577 to obtain a copy of the report.

5.3. Human Right to Water Portal

The State Water Board assesses water systems that fail to meet the goals of the Human Right to Water and maintains a list and map of these systems on its website

(https://www.waterboards.ca.gov/safer/dw_systems_violations_tool.html).

Systems that are on the Human Right to Water list (HR2W list) are those that are out of compliance or consistently fail to meet primary drinking water standards. Systems that are assessed for meeting the HR2W list criteria include Community Water Systems (CWSs) and Non-Community Water Systems (NCWSs) that serve schools and daycares. The Human Right to Water Portal provides tools for the public to find out if their public water system is in compliance with the drinking water standards, and how to get in contact with their water system.

Glossary of Terms

Term	Description
Public Water System (PWS)	A system that provides water via piping or other constructed conveyances for human consumption to at least 15 service connections or serves at least 25 people for at least 60 days each year.
Community water system (CWS)	A water system serving facilities such as cities, towns, mobile home parks.
Nontransient noncommunity water system (NTNC)	A water system serving facilities such as schools, factories or other facilities that serve the same group of non-resident users at least 180 days out of the year.
Transient noncommunity water system (TNC)	A water system serving facilities such as restaurants, parks, rest stops, campgrounds and other facilities that serve a transient population for at least 60 days out of the year.
Primary Drinking Water Standards	MCLs and MRDLs for contaminants that affect health along with their monitoring and reporting requirements, and water treatment requirements.
Maximum Contaminant Level (MCL)	The highest level of a contaminant that is allowed in drinking water. Primary MCLs are set as close to the PHGs (or MCLGs) as is economically and technologically feasible. Secondary MCLs are set to protect the odor, taste, and appearance of drinking water.
Maximum Residual Disinfectant Level (MRDL)	The highest level of a disinfectant allowed in drinking water. There is convincing evidence that addition of a disinfectant is necessary for control of microbial contaminants.
Treatment Techniques (TT)	A required process intended to reduce the level of a contaminant in drinking water in lieu of an MCL. For example, treatment techniques have been established for the treatment of surface waters in order to control the levels of viruses, bacteria, and other pathogens.
Variations and Exemptions	State Water Board permission to exceed an MCL or not comply with a TT under certain conditions.
Monitoring and Reporting (M/R)	A water system is required to monitor and verify that the levels of contaminants present in the water do not exceed the MCL. A monitoring violation occurs when a

Term	Description
	water system fails to have its water tested as required or fails to report test results correctly to the regulatory agency.
Secondary Drinking Water Standards	MCLs for contaminants for aesthetics effects, to protect the odor, taste, and appearance of drinking water. Contaminants with secondary MCLs (SMCL) are not considered to present a risk to human health at the SMCL.
Significant Monitoring or Reporting Violations	For this report, significant monitoring or reporting violations are defined as when no samples were taken, or no results were reported
Public Notification	The Public Notification Rule requires all PWS to notify their consumers any time a PWS violated a national primary drinking water regulation or has a situation posing a risk to public health. The time period that a PWS must notify the public depends upon the risk posed by the violation or situation. Notices must be provided to persons served (not just billing consumers).
Significant Public Notification Violations	For this report, a significant public notification violation occurs when a PWS completely fails to notify its consumers that the PWS violated a national primary drinking water regulation or had a situation posing a risk to public health.
Consumer Confidence Report (CCR)	All community water systems and nontransient noncommunity water systems are required to deliver to their customers an annual CCR, summarizing water quality data collected during the year. The report is to include educational material, provide information on the source water(s), levels of any detected contaminants, and any compliance issues with the drinking water regulations.
Significant Consumer Notification Violations	For this report, a significant consumer notification violation is incurred if a community or nontransient noncommunity water system completely fails to provide its customers the required annual CCR.
pCi/L	Picocuries per liter, a measure of radioactivity
ppm	Parts per million, equivalent to about 32 seconds out of a year. Same as milligrams per liter (mg/L)
ppb	Parts per billion, equivalent to about three seconds out of a century. Same as micrograms per liter (ug/L)

Appendix A: Summary of MCL Violations for Arsenic by County

County	Contaminant	PWS ID	PWS Name	Population Served	Number of Violations
COLUSA	Arsenic	CA0600008	COLUSA CO. WWD #1 - GRIMES	381	4
CONTRA COSTA	Arsenic	CA0707573	DELTA MUTUAL WATER COMPANY	225	4
EL DORADO	Arsenic	CA0900102	GOLD BEACH PARK	100	1
FRESNO	Arsenic	CA1010039	CARUTHERS COMM SERV DIST	2503	4
INYO	Arsenic	CA1400036	KEELER COMMUNITY SERVICE DISTRICT	50	4
INYO	Arsenic	CA1400526	EASTERN SIERRA COLLEGE CENTER - BISHOP	280	1
KERN	Arsenic	CA1500424	LANDS OF PROMISE MWC	174	3
KERN	Arsenic	CA1500436	HUNGRY GULCH MWC	74	3
KERN	Arsenic	CA1500442	SUNSET APARTMENTS WS	37	3
KERN	Arsenic	CA1500455	WILLIAM FISHER MEMORIAL WATER COMPANY	56	3
KERN	Arsenic	CA1500458	R.S. MUTUAL WATER COMPANY	67	3
KERN	Arsenic	CA1500461	FOUNTAIN TRAILER PARK WATER	68	3
KERN	Arsenic	CA1500525	LAKEVIEW RANCHOS MUTUAL WATER COMPANY	120	3
KERN	Arsenic	CA1500571	KERN MOBILE ESTATES LLC	73	3

County	Contaminant	PWS ID	PWS Name	Population Served	Number of Violations
KERN	Arsenic	CA1502231	ROSAMOND SCHOOL WATER SYSTEM	940	3
KERN	Arsenic	CA1502569	FIRST MUTUAL WATER SYSTEM	35	3
KERN	Arsenic	CA1502744	60TH STREET ASSOC. WATER SYSTEM	39	2
KERN	Arsenic	CA1510016	RAND COMMUNITIES WATER DISTRICT	303	3
KERN	Arsenic	CA1510052	NORTH EDWARDS WD	944	2
KINGS	Arsenic	CA1600050	CENTRAL VALLEY MEAT CO INC	525	4
KINGS	Arsenic	CA1600605	BAKER COMMODITIES INC.	47	3
KINGS	Arsenic	CA1600609	NETTO AG INC.	50	1
LOS ANGELES	Arsenic	CA1900038	LANCASTER PARK MOBILE HOME PARK	61	4
LOS ANGELES	Arsenic	CA1900100	METTLER VALLEY MUTUAL	135	4
LOS ANGELES	Arsenic	CA1900520	THE VILLAGE MOBILE HOME PARK	50	4
LOS ANGELES	Arsenic	CA1900785	MITCHELL'S AVENUE E MOBILE HOME PARK	24	4
LOS ANGELES	Arsenic	CA1900961	WINTERHAVEN MOBILE ESTATES	56	4
LOS ANGELES	Arsenic	CA1910246	LAND PROJECTS MUTUAL WATER CO.	1500	2
MADERA	Arsenic	CA2000551	MD 07 MARINA VIEW HEIGHTS	200	1
MERCED	Arsenic	CA2400335	OLIVARES FARMS WATER SYSTEM	30	3
MERCED	Arsenic	CA2400342	CALIFORNIA FRESH FARMS	60	4

County	Contaminant	PWS ID	PWS Name	Population Served	Number of Violations
MERCED	Arsenic	CA2400345	JS WEST MILLING CO HILMAR RANCH	68	3
MONO	Arsenic	CA2600622	SIERRA EAST HOA	84	6
MONTEREY	Arsenic	CA2700536	CORRAL DE TIERRA ESTATES WC	45	4
MONTEREY	Arsenic	CA2700612	LAGUNA SECA WC	162	4
MONTEREY	Arsenic	CA2701221	WASHINGTON SCHOOL WS	250	4
MONTEREY	Arsenic	CA2701926	MORO RD WS #09	210	4
MONTEREY	Arsenic	CA2702009	LAGUNA SECA RECREATION WS	500	5
MONTEREY	Arsenic	CA2702550	GRANGE HALL WS	25	4
NEVADA	Arsenic	CA2900508	KINGVALE PROPERTY OWNERS & WATER USERS	180	1
RIVERSIDE	Arsenic	CA3301380	SAINT ANTHONY TRAILER PARK	340	4
SAN BENITO	Arsenic	CA3500810	WHISPERING PINES INN	38	1
SAN BENITO	Arsenic	CA3500823	BEST ROAD MWC	133	1
SAN BERNARDINO	Arsenic	CA3600025	BAR-LEN MWC	124	4
SAN BERNARDINO	Arsenic	CA3600504	KNOLL ENTERPRISES	500	4
SAN BERNARDINO	Arsenic	CA3601015	IRONWOOD CAMP	1000	2
SAN DIEGO	Arsenic	CA3701010	WARNER UNIFIED SCHOOL DISTRICT	250	4
SAN DIEGO	Arsenic	CA3701793	TWIN LAKES RESORT	200	3
SAN JOAQUIN	Arsenic	CA3900579	CENTURY MOBILE HOME PARK	50	3

County	Contaminant	PWS ID	PWS Name	Population Served	Number of Violations
SAN JOAQUIN	Arsenic	CA3901169	MUSD-NILE GARDEN SCHOOL	804	4
SAN JOAQUIN	Arsenic	CA3901176	PHILLIPS FARMS	330	2
SAN JOAQUIN	Arsenic	CA3901213	SUNNY ROAD WATER SYSTEM	30	4
SAN JOAQUIN	Arsenic	CA3901418	AUSTIN INDUSTRIAL PARK WATER SYSTEM	25	4
SAN JOAQUIN	Arsenic	CA3902189	GICO MANAGEMENT	60	2
SAN LUIS OBISPO	Arsenic	CA4000631	ALMIRA WATER ASSOCIATION	40	1
STANISLAUS	Arsenic	CA5000033	COBLES CORNER	50	4
STANISLAUS	Arsenic	CA5000218	COUNTRY VILLA APTS	60	4
STANISLAUS	Arsenic	CA5000255	MOUNTAIN VIEW ELEMENTARY SCHOOL	364	4
STANISLAUS	Arsenic	CA5000316	HAKAM MISSON	45	1
STANISLAUS	Arsenic	CA5000465	DUARTE NURSERY INC WATER SYSTEM	75	1
STANISLAUS	Arsenic	CA5000498	GOLDEN STATE PFT PROPERTIES LLC	35	4
STANISLAUS	Arsenic	CA5000499	RATTO BROS, INC	100	4
STANISLAUS	Arsenic	CA5010008	HUGHSON, CITY OF	6082	4
STANISLAUS	Arsenic	CA5010009	KEYES COMMUNITY SERVICES DIST.	5939	1
SUTTER	Arsenic	CA5100107	SUTTER CO. WWD#1 (ROBBINS)	339	1
SUTTER	Arsenic	CA5100145	WINSHIP ELEMENTARY SCHOOL	38	1
SUTTER	Arsenic	CA5100149	BARRY ELEMENTARY SCHOOL	650	1
TEHAMA	Arsenic	CA5210003	LOS MOLINOS COMM. SERVICES DIST.	1450	1

County	Contaminant	PWS ID	PWS Name	Population Served	Number of Violations
TULARE	Arsenic	CA5400544	ALLENSWORTH CSD	521	2
TULARE	Arsenic	CA5402036	R-RANCH IN THE SEQUOIAS	330	4

Appendix B: Summary of MCL Violations for Nitrate and Combined Nitrate-Nitrite by County

County	Contaminant	PWS ID	PWS Name	Population Served	Number of Violations
FRESNO	Nitrate	CA1000057	DEL ORO WATER CO - METROPOLITAN DISTRICT	96	4
KERN	Nitrate	CA1500393	RAINBIRD VALLEY MUTUAL WATER COMPANY	238	3
KERN	Nitrate	CA1500401	METTLER COUNTY WATER DISTRICT	157	1
KERN	Nitrate	CA1500409	BROCK MUTUAL WATER COMPANY	462	2
KERN	Nitrate	CA1500458	R.S. MUTUAL WATER COMPANY	67	3
KERN	Nitrate	CA1500464	LAKE ISABELLA KOA CAMPGROUND	280	3
KERN	Nitrate	CA1500566	SPRING MOUNTAIN MUTUAL WATER COMPANY	26	3
KERN	Nitrate	CA1500575	SAN JOAQUIN ESTATES MUTUAL WATER COMPANY	165	2
KERN	Nitrate	CA1500588	SON SHINE PROPERTIES	438	2
KERN	Nitrate	CA1502012	HECK CELLARS WATER SYSTEM	47	3
KERN	Nitrate	CA1502229	RIO BRAVO GREELEY SCHOOL WATER SYSTEM	887	1

County	Contaminant	PWS ID	PWS Name	Population Served	Number of Violations
KERN	Nitrate	CA1502699	EAST WILSON ROAD WATER COMPANY	35	2
KERN	Nitrate	CA1503688	GRIMMWAY FARMS - DAVID ROAD	114	3
KERN	Nitrate	CA1504003	KERN RIDGE GROWERS	95	2
KERN	Nitrate	CA1510023	LAKE OF THE WOODS MWC	1103	1
MERCED	Nitrate	CA2400335	OLIVARES FARMS WATER SYSTEM	30	1
MONTEREY	Nitrate	CA2700738	SAN MIGUEL WS #01	100	1
MONTEREY	Nitrate	CA2700771	SPRINGFIELD WATER COMPANY	200	4
MONTEREY	Nitrate	CA2700772	STRUVE RD WS #02	166	1
MONTEREY	Nitrate	CA2701036	APPLE AVE WS #03	60	3
MONTEREY	Nitrate	CA2701063	RIVER RD WS #25	65	4
MONTEREY	Nitrate	CA2701241	ENCINAL RD WS #01	41	1
MONTEREY	Nitrate	CA2702409	EL CAMINO WC INC	90	4
RIVERSIDE	Nitrate	CA3301330	INDIAN OAKS TRAILER PARK	90	4
RIVERSIDE	Nitrate	CA3301529	RAMONA WATER COMPANY	250	3
RIVERSIDE	Nitrate	CA3301644	STAGECOACH INN	303	1
SAN BENITO	Nitrate	CA3500903	SAN JUAN OAKS GOLF CLUB	450	2
SAN BENITO	Nitrate-Nitrite	CA3500927	ENZA ZADEN RESEARCH	65	2
SAN BERNARDINO	Nitrate	CA3600027	BAR "H" MWC	260	1
SAN BERNARDINO	Nitrate	CA3600391	HILLCREST MOBILE ESTATES	900	4
SAN BERNARDINO	Nitrate	CA3600768	INSTITUTE OF MENTAL PHYSICS	100	1

County	Contaminant	PWS ID	PWS Name	Population Served	Number of Violations
SAN BERNARDINO	Nitrate	CA3601137	LIZZE ENTERPRISES	25	1
SAN DIEGO	Nitrate	CA3700018	CAMPO ELEMENTARY SCHOOL	300	4
SAN DIEGO	Nitrate	CA3700065	SOUTH BAY ROD & GUN CLUB INC.	200	3
SAN DIEGO	Nitrate	CA3700924	LAKE MORENA VIEWS MWC	360	3
SAN DIEGO	Nitrate	CA3700934	PAUMA VALLEY WATER COMPANY	193	4
SAN DIEGO	Nitrate	CA3701341	QUIET OAKS MOBILE HOME PARK	120	4
SAN DIEGO	Nitrate	CA3701476	INDIAN HILLS CAMP	400	1
SAN DIEGO	Nitrate	CA3702364	CLOVER FLAT ELEMENTARY SCHOOL	160	1
SAN DIEGO	Nitrate	CA3702706	BOULEVARD PINES MOBILE HOME AND RV PARK	25	3
SAN JOAQUIN	Nitrate	CA3901164	SUBTERA WATER SYSTEM	150	4
SAN JOAQUIN	Nitrate	CA3901387	STOCKTON BAPTIST CHURCH	25	4
SANTA BARBARA	Nitrate	CA4200842	SAINT MARIE MOBILE HOME PARK	250	1
SANTA BARBARA	Nitrate	CA4200867	RAY WATER COMPANY	40	1
SANTA BARBARA	Nitrate	CA4200907	HEALTH SANITATION SERVICES RECYCLING CTR	75	1
STANISLAUS	Nitrate	CA5000295	SHILOH SCHOOL DISTRICT	105	2
STANISLAUS	Nitrate	CA5000372	STORER TRANSPORTATION	40	4
STANISLAUS	Nitrate	CA5000402	OUR LADY OF ASSUMPTION CHURCH	26	1

County	Contaminant	PWS ID	PWS Name	Population Served	Number of Violations
STANISLAUS	Nitrate	CA5000426	LIBERTY BAPTIST CHURCH	65	3
STANISLAUS	Nitrate	CA5000435	BLOOMINGCAMP WATER SYSTEM	25	4
STANISLAUS	Nitrate	CA5000457	ONE STOP WS	50	1
STANISLAUS	Nitrate	CA5000462	BEST WESTERN-ORCHARD INN	26	4
STANISLAUS	Nitrate	CA5000465	DUARTE NURSERY INC WATER SYSTEM	75	1
STANISLAUS	Nitrate	CA5000600	MID VALLEY NUT CO	60	1
TULARE	Nitrate	CA5400541	PORTERVILLE CITRUS RAYO	100	4
TULARE	Nitrate	CA5400558	SAUCELITO ELEMENTARY SCHOOL	91	4
TULARE	Nitrate	CA5400616	LEMON COVE WATER CO	109	4
TULARE	Nitrate	CA5400636	OROSI HIGH SCHOOL	1200	3
TULARE	Nitrate	CA5400666	DEL ORO GRANDVIEW GARDENS DISTRICT	327	1
TULARE	Nitrate	CA5400670	TRIPLE R MUTUAL WATER CO	408	4
TULARE	Nitrate	CA5400709	SEQUOIA UNION ELEMENTARY SCHOOL	400	3
TULARE	Nitrate	CA5400735	RODRIGUEZ LABOR CAMP	110	4
TULARE	Nitrate	CA5400795	WAUKENA ELEMENTARY SCHOOL	255	4
TULARE	Nitrate	CA5400964	SIERRA VISTA ASSN	44	4
TULARE	Nitrate	CA5400987	OLD STAGE SALOON AT FOUNTAIN SPRINGS	25	1
TULARE	Nitrate	CA5400994	HOPE ELEMENTARY SCHOOL	275	4
TULARE	Nitrate	CA5402013	SUN PACIFIC SHIPPERS LP - EXETER	200	4

County	Contaminant	PWS ID	PWS Name	Population Served	Number of Violations
TULARE	Nitrate	CA5402030	WAUKENA MARKET	100	3
TULARE	Nitrate	CA5402041	BIG B TRAVEL CENTER 2	27	1
TULARE	Nitrate	CA5402046	WATERMAN VALVE, LLC	157	3
TULARE	Nitrate	CA5403022	APTCO LLC	150	4
TULARE	Nitrate	CA5403041	FAMILY TREE FARMS	30	3
TULARE	Nitrate	CA5403046	VISALIA CITRUS PACKING GROUP-ORANGE COVE	78	4
TULARE	Nitrate	CA5403048	J.D. HEISKELL & CO.	60	3
TULARE	Nitrate	CA5403081	PETERS FRUIT FARMS, INC	125	4
TULARE	Nitrate	CA5403105	THE BARN	200	4
TULARE	Nitrate	CA5403106	EXETER-IVANHOE CITRUS ASSOCIATION	106	4
TULARE	Nitrate	CA5403110	SIERRA MUTUAL WATER CO	43	3
TULARE	Nitrate	CA5403122	PC'S FOOD MART	500	3
TULARE	Nitrate	CA5403151	ARCO AM PM - PIXLEY	1000	4
TULARE	Nitrate	CA5403211	BOOTH RANCHES LLC	150	4
TULARE	Nitrate	CA5403215	FRESH SELECT, LLC	30	4
TULARE	Nitrate	CA5410024	RICHGROVE COMMUNITY SERVICES DISTRICT	1617	2
YOLO	Nitrate	CA5700537	HARRIS MORAN SEED COMPANY - WATER	25	6
YOLO	Nitrate	CA5700623	DAVIS JUSD - FAIRFIELD SCHOOL	65	3
YOLO	Nitrate	CA5700761	CLARK PACIFIC - CR 18C	320	2
YOLO	Nitrate	CA5700788	NORTH DAVIS MEADOWS	314	4

Appendix C: Summary of MCL Violations for 1,2,3-TCP by County

County	Contaminant	PWS ID	PWS Name	Population Served	Number of Violations
FRESNO	1,2,3-Trichloropropane	CA1000004	BELMONT WATER CORPORATION	264	4
FRESNO	1,2,3-Trichloropropane	CA1000023	FCSA #14/BELMONT MANOR	115	4
FRESNO	1,2,3-Trichloropropane	CA1000180	ALTA ELEMENTARY SCHOOL	384	4
FRESNO	1,2,3-Trichloropropane	CA1000196	RIVERVIEW SCHOOL	469	4
FRESNO	1,2,3-Trichloropropane	CA1000204	AMERICAN UNION SCHOOL	250	1
FRESNO	1,2,3-Trichloropropane	CA1000473	BELMONT COUNTRY CLUB	150	1
FRESNO	1,2,3-Trichloropropane	CA1000566	FOSTER FARMS - CEDAR HATCHERY	35	4
FRESNO	1,2,3-Trichloropropane	CA1000604	JOHANN DAIRY	50	3
KERN	1,2,3-Trichloropropane	CA1500401	METTLER COUNTY WATER DISTRICT	157	2
KERN	1,2,3-Trichloropropane	CA1500597	GRIMMWAY FARMS- FROZEN FOODS	300	3
KERN	1,2,3-Trichloropropane	CA1502012	HECK CELLARS WATER SYSTEM	47	3
KERN	1,2,3-Trichloropropane	CA1503093	GRIMMWAY ENTERPRISES- MALAGA WATER SYSTEM	1200	3
KERN	1,2,3-Trichloropropane	CA1503688	GRIMMWAY FARMS - DAVID ROAD	114	3
KERN	1,2,3-Trichloropropane	CA1510019	SHAFTER, CITY OF	20500	2

County	Contaminant	PWS ID	PWS Name	Population Served	Number of Violations
MERCED	1,2,3-Trichloropropane	CA2400011	DOLE ATWATER PLANT	1500	8
MERCED	1,2,3-Trichloropropane	CA2400013	SENSIENT NATURAL INGREDIENTS LLC	400	4
MERCED	1,2,3-Trichloropropane	CA2400065	PLAINSBURG ELEMENTARY SCHOOL	126	1
MERCED	1,2,3-Trichloropropane	CA2400079	MCSWAIN ELEMENTARY SCHOOL	950	8
MERCED	1,2,3-Trichloropropane	CA2400084	EVERGREEN MOBILE HOME PARK	36	4
MERCED	1,2,3-Trichloropropane	CA2400097	CRESSEY SCHOOL	155	4
MERCED	1,2,3-Trichloropropane	CA2400099	GRACE MENNONITE SCHOOL	100	4
MERCED	1,2,3-Trichloropropane	CA2400162	HUGHSON NUT INC. - LIVINGSTON	120	4
MERCED	1,2,3-Trichloropropane	CA2400167	BALLICO CSD	238	4
MERCED	1,2,3-Trichloropropane	CA2400218	FOSTER FARMS FERTILIZER PLANT	40	4
MERCED	1,2,3-Trichloropropane	CA2400232	AV THOMAS PRODUCE, INC.	206	4
MERCED	1,2,3-Trichloropropane	CA2400331	QUAIL H FARMS WATER SYSTEM	30	4
MERCED	1,2,3-Trichloropropane	CA2400333	YAGI BROTHERS PRODUCE INC.	46	1
MERCED	1,2,3-Trichloropropane	CA2400343	GEMPERLE EGG RANCH	55	2
MERCED	1,2,3-Trichloropropane	CA2410001	CITY OF ATWATER	29479	24
MERCED	1,2,3-Trichloropropane	CA2410004	CITY OF LIVINGSTON	14894	26
MERCED	1,2,3-Trichloropropane	CA2410010	WINTON WATER & SANITARY DIST	9500	8

County	Contaminant	PWS ID	PWS Name	Population Served	Number of Violations
RIVERSIDE	1,2,3-Trichloropropane	CA3301577	CSA 62	700	4
RIVERSIDE	1,2,3-Trichloropropane	CA3301939	JEWEL DATE CO. INC.	88	1
SAN JOAQUIN	1,2,3-Trichloropropane	CA3900624	IL VINETO	160	2
SAN JOAQUIN	1,2,3-Trichloropropane	CA3900978	SJ COUNTY-REDWOOD SCHOOL	83	4
SAN JOAQUIN	1,2,3-Trichloropropane	CA3900983	CHERRY LANE TRAILER PARK	100	4
SAN JOAQUIN	1,2,3-Trichloropropane	CA3901169	MUSD-NILE GARDEN SCHOOL	804	4
SAN JOAQUIN	1,2,3-Trichloropropane	CA3901414	MCLAUGHLIN WASTE EQUIPMENT INC	25	4
SAN JOAQUIN	1,2,3-Trichloropropane	CA3901425	MORADA PRODUCE	25	4
SAN JOAQUIN	1,2,3-Trichloropropane	CA3910005	MANTECA, CITY OF	83028	4
SAN JOAQUIN	1,2,3-Trichloropropane	CA3910014	SAN JOAQUIN COUNTY-RAYMUS VILLAGE	2234	3
STANISLAUS	1,2,3-Trichloropropane	CA5000033	COBLES CORNER	50	5
STANISLAUS	1,2,3-Trichloropropane	CA5000249	STANISLAUS UNION SCHOOL DIST	390	4
STANISLAUS	1,2,3-Trichloropropane	CA5000273	GRATTON SCHOOL	110	4
STANISLAUS	1,2,3-Trichloropropane	CA5000411	MCHENRY BUSINESS PARK	27	4

County	Contaminant	PWS ID	PWS Name	Population Served	Number of Violations
STANISLA US	1,2,3-Trichloropropane	CA5000465	DUARTE NURSERY INC WATER SYSTEM	75	4
STANISLA US	1,2,3-Trichloropropane	CA5000552	KIERNAN BUSINESS CENTER	120	4
STANISLA US	1,2,3-Trichloropropane	CA5000554	HUGHSON NUT #2	25	4
STANISLA US	1,2,3-Trichloropropane	CA5000563	ELKS LODGE 1282	25	4
STANISLA US	1,2,3-Trichloropropane	CA5000565	STERLING INDUSTRIAL	35	4
STANISLA US	1,2,3-Trichloropropane	CA5000600	MID VALLEY NUT CO	60	4
STANISLA US	1,2,3-Trichloropropane	CA5010007	HILLSVIEW HOMES	887	4
STANISLA US	1,2,3-Trichloropropane	CA5010008	HUGHSON, CITY OF	6082	4
STANISLA US	1,2,3-Trichloropropane	CA5010009	KEYES COMMUNITY SERVICES DIST.	5939	4
STANISLA US	1,2,3-Trichloropropane	CA5010028	CERES, CITY OF	48697	4
TULARE	1,2,3-Trichloropropane	CA5400558	SAUCELITO ELEMENTARY SCHOOL	91	3
TULARE	1,2,3-Trichloropropane	CA5400641	TEVISTON CSD	343	3
TULARE	1,2,3-Trichloropropane	CA5400711	SIERRA VIEW JR ACADEMY	104	4
TULARE	1,2,3-Trichloropropane	CA5400735	RODRIGUEZ LABOR CAMP	110	4
TULARE	1,2,3-Trichloropropane	CA5400792	WOODVILLE FARM LABOR CENTER	650	4
TULARE	1,2,3-Trichloropropane	CA5400844	ELBOW CREEK SCHOOL	530	4

County	Contaminant	PWS ID	PWS Name	Population Served	Number of Violations
TULARE	1,2,3-Trichloropropane	CA5400964	SIERRA VISTA ASSN	44	3
TULARE	1,2,3-Trichloropropane	CA5401076	GOLDEN STATE VINTNERS CUTLER	46	4
TULARE	1,2,3-Trichloropropane	CA5403041	FAMILY TREE FARMS	30	4
TULARE	1,2,3-Trichloropropane	CA5403080	LEGACY PACKING	125	4
TULARE	1,2,3-Trichloropropane	CA5403081	PETERS FRUIT FARMS, INC	125	4
TULARE	1,2,3-Trichloropropane	CA5403140	MONARCH NUT CO	400	4
TULARE	1,2,3-Trichloropropane	CA5403211	BOOTH RANCHES LLC	150	4
TULARE	1,2,3-Trichloropropane	CA5410015	TULARE, CITY OF	65982	4
TULARE	1,2,3-Trichloropropane	CA5410021	EARLIMART PUD	8800	2