

State Water Resources Control Board

Division of Drinking Water

SUSPENSION OF FIELDS OF ACCREDITATION TOTAL COLIFORM P/A, E. COLI P/A, TOTAL COLIFORM (ENUMERATION), AND E. COLI (ENUMERATION) PER STANDARD METHOD 9223 B COLILERT ELAP CERTIFICATE NO. 1952

VIA CERTIFIED MAIL, U.S. MAIL, AND EMAIL

October 8, 2025

Certificate No. 1952

Michael Torres, Laboratory Supervisor
City of Vacaville Water Quality Laboratory
6040 Vaca Station Road
Elmira, CA 95625

Dear Michael Torres:

By letter dated September 17, 2025, the State Water Resources Control Board (State Water Board) Environmental Laboratory Accreditation Program (ELAP) informed the City of Vacaville Water Quality Laboratory (Laboratory) of its intent to suspend Fields of Accreditation Total Coliform P/A, E. coli P/A, Total Coliform (Enumeration), and E. coli (Enumeration) per Standard Method 9223 B Colilert – ELAP Certificate No. 1952. (Appendix 1.) The letter notified the Laboratory that it had 20 days from the date on which the letter was received to request a hearing. Our records indicate that the Laboratory received the Notice of Suspension letter via electronic mail on September 17, 2025. The Laboratory's deadline for requesting a hearing pursuant to Health and Safety Code section 100910 has expired. **Accordingly, ELAP hereby suspends the following Fields of Accreditation (FOA) based on its determination that the Laboratory violated California Code of Regulations, title 22, section 64802.05, subdivision (a) by deviating from TNI Standards for SM 9223 B Colilert:**

Subgroup Code	Analyte Code	Analyte	Method
101.050	001	Total Coliform P/A	SM 9223 B Colilert
101.050	002	E. coli P/A	SM 9223 B Colilert
101.050	003	Total Coliform (Enumeration)	SM 9223 B Colilert
101.050	004	E. coli (Enumeration)	SM 9223 B Colilert

Attached as Appendix 2 is an updated Scope of Accreditation reflecting this suspension.

Effective immediately, the Laboratory must (1) cease all reporting of results for regulatory purposes for the suspended FOAs and (2) notify all clients of the suspension within three days of receiving this notice. Notification must be made by registered mail, email with return receipt, or electronic signature document. (Cal. Code Regs., tit. 22, § 64816.10, subd. (c).)

The Environmental Laboratory Accreditation Act (ELAA) authorizes ELAP to issue an order or citation with assessment of administrative penalties for violation or continued violation of the requirements of the ELAA or any regulation or order issued or adopted pursuant to the ELAA. ELAP does not waive any further enforcement action by issuing this notice pursuant to Health and Safety Code section 100910.

Should you have any technical questions or require further assistance, please contact Leann Castle at leann.castle@waterboards.ca.gov. For any legal inquiries or clarifications, please contact Samantha Ramadan, Attorney with the Office of Enforcement, at samantha.ramadan@waterboards.ca.gov.

Sincerely,



Christine Sotelo, Program Manager
Environmental Laboratory Accreditation Program
Division of Drinking Water
State Water Resources Control Board

Attachment(s):

Appendix 1 – Notice of Suspension Letter Dated September 17, 2025

Appendix 2 – Scope of Accreditation for ELAP Certificate No. 1952

cc:

Michael Head, ELAP, SWRCB
Laura Mooney, Office of Enforcement, SWRCB
Kim Niemeyer, Office of Chief Counsel SWRCB
Emily Roberts, Office of Chief Counsel, SWRCB
Robert Brownwood, Division of Drinking Water, SWRCB
Darrin Polhemus, Division of Drinking Water, SWRCB
Dan Newton, Division of Drinking Water, SWRCB
Stefan Cajina, Division of Drinking Water, SWRCB
Marco Pacheco, Division of Drinking Water, SWRCB
Alla Lilichenko, Division of Drinking Water, SWRCB
Cynthia Holman, US EPA Region 9
Luis Garcia-Bakarich, US EPA Region 9
Chris Cagurangan, US EPA Region 9
Christopher Chen, US EPA Region 9
Lawrence Torres, US EPA Region 9
Mindy Boele, City of Vacaville
Justen Cole, City of Vacaville
Savita Chaudhary, City of Vacaville

Appendix 1

Notice of Suspension Letter Dated September 17, 2025



State Water Resources Control Board

Division of Drinking Water

NOTICE OF SUSPENSION

September 17, 2025

Michael Torres, Laboratory Supervisor
City of Vacaville Water Quality Laboratory
6040 Vaca Station Road
Elmira, CA 95625

Certificate No. 1952

Dear Michael Torres:

On July 29, 2025, the State Water Resources Control Board (State Water Board) Environmental Laboratory Accreditation Program (ELAP) staff conducted an on-site investigation of City of Vacaville Water Quality Laboratory (the Laboratory) and documented the following violations:

- (1) The Laboratory failed to comply with the technical specifications of Standard Method 9223 B Colilert (SM B Colilert), which requires that samples be incubated for at least 24 hours and no more than 28 hours. The Laboratory's logbook for treated wells (Laboratory Book ID: pLOG_WellsDaily_1.1_25.01) documents instances where the Laboratory incubated samples run under SM B Colilert for less than 24 hours. Failure to comply with the technical specifications of SM B Colilert is a violation of TNI Volume 1, Module 2, Section 5.4.1¹ and California Code of Regulations, title 22, section 64802.05, subdivision (a).
- (2) The Laboratory failed to document deviations from SM B Colilert on final reports. Failure to include information on method deviation in laboratory reports

¹ TNI Volume 1, Module 2, Section 5.4.1 states, "The laboratory shall use appropriate methods and procedures for all tests and/or calibrations within its scope...Deviation from test and calibration methods shall occur only if the deviation has been documented, technically justified, authorized, and accepted by the customer."

is a violation of TNI Volume 1, Module 2, Sections 5.10.1² and 5.10.3.1³ and California Code of Regulations, title 22, section 64802.05, subdivision (a).

- (3) The Laboratory deviated from its standard operating procedures (SOPs). The Laboratory's SOPs for SM B Colilert (Standard Operating Procedure for Total Coliforms and Escherichia coli Detection and Enumeration by IDEXX Colilert 24 and Quanti-Tray 2000) states that incubation must occur for 24 hours. Failure to comply with the Laboratory's SOPs is a violation of TNI Volume 1, Module 2, Section 4.2.8.5⁴ and California Code of Regulations, title 22, section 64802.05, subdivision (a).
- (4) The Laboratory conducted procedures that deviate from the method to which the laboratory is certified without controlling the nonconforming work. Mr. Torres, who serves as the Laboratory's Director, Technical Manager, and Quality Manager, confirmed with ELAP staff that he approved incubation termination at intervals outside the SM B Colilert range of 24 to 28 hours. The Laboratory failed to identify and document nonconforming testing when it occurred. Failure to identify and document nonconforming laboratory work is a violation of TNI Volume 1, Module 2, Section 4.9.1⁵ and California Code of Regulations, title 22, section 64802.05, subdivision (a).

The Laboratory's failure to comply with the Environmental Laboratory Accreditation Act (ELAA) (Health and Safety Code section 100825, *et seq.*), regulations adopted under the ELAA, and standards regarding incubation periods can have several serious consequences, including false negatives and inaccurate monitoring and reporting. Observing correct incubation periods is fundamental to producing data of known, consistent, and documented quality.

Accordingly, ELAP hereby provides notice to the Laboratory of its intent to suspend the following Fields of Accreditation pursuant to Health and Safety Code sections 100905

² TNI Volume 1, Module 2, Section 5.10.1 states, "The results of each test, calibration, or series of tests or calibrations carried out by the laboratory shall be reported accurately, clearly, unambiguously and objectively, and in accordance with any specific instructions in the test or calibration methods."

³ TNI Volume 1, Module 2, Section 5.10.3.1 states, "[T]est reports shall, where necessary for the interpretation of the test results, include the following: a) deviations from, additions to, or exclusions from the test method, and information on specific test conditions; b) where relevant, a statement of compliance/non-compliance with requirements and/or specifications..."

⁴ TNI Volume 1, Module 2, Section 4.2.8.5 states, "Laboratories shall maintain SOPs that accurately reflect all phases of current laboratory activities, such as assessing data integrity, corrective actions, handling customer complaints, and all methods."

⁵ TNI Volume 1, Module 2, Section 4.9.1 states, "The laboratory shall have a policy and procedures that shall be implemented when any aspect of its testing and/or calibration work, or the results of this work, do not conform to its own procedures or the agreed requirements of the customer."

and 100910 and California Code of Regulations, title 22, section 64816.10, subdivisions (a)(2) and (a)(16):

Subgroup Code	Analyte Code	Analyte	Method
101.050	001	Total Coliform P/A	SM 9223 B Colilert
101.050	002	E. coli P/A	SM 9223 B Colilert
101.050	003	Total Coliform (Enumeration)	SM 9223 B Colilert
101.050	004	E.coli (Enumeration)	SM 9223 B Colilert

A process exists by which the owner of City of Vacaville Water Quality Laboratory may request a hearing regarding this notice of intent to suspend Fields of Accreditation Total Coliform P/A, E. coli P/A, Total Coliform (Enumeration), and E. coli (Enumeration) per Standard Method 9223 B Colilert – ELAP Certificate 1952. The owner of the laboratory must submit the request for a hearing not later than 20 days from the date on which this notice is received. If the owner submits a timely request for a hearing, the hearing shall be before the State Water Board or a member of the State Water Board, in accordance with Section 183 of the Water Code and the rules for adjudicative proceedings adopted under Section 185 of the Water Code. If the owner does not submit a timely request for a hearing, the Fields of Accreditation will be suspended without a hearing. (Health & Saf. Code, § 100910, subd. (a).)

To reinstate suspended Fields of Accreditation, the Laboratory shall submit an amendment application to ELAP in accordance with California Code of Regulations, title 22, section 64808.15, subdivision (h).

The ELAA authorizes ELAP to issue an order or citation with assessment of administrative penalties for violation or continued violation of the requirements of the ELAA or any regulation or order issued or adopted pursuant to the ELAA. ELAP does not waive any further enforcement action by issuing this notice pursuant to Health and Safety Code section 100910.

Should you have any technical questions or require further assistance, please contact Leann Castle at leann.castle@waterboards.ca.gov. For any legal inquiries or clarifications, please contact Samantha Ramadan, Attorney with the Office of Enforcement, at samantha.ramadan@waterboards.ca.gov.

Sincerely,



Christine Sotelo, Program Manager
Environmental Laboratory Accreditation Program
Division of Drinking Water
State Water Resources Control Board

cc:

Michael Head, ELAP, SWRCB
Laura Mooney, Office of Enforcement, SWRCB
Kim Niemeyer, Office of Chief Counsel SWRCB
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Darrin Polhemus, Division of Drinking Water, SWRCB
Dan Newton, Division of Drinking Water, SWRCB
Stefan Cajina, Division of Drinking Water, SWRCB
Marco Pacheco, Division of Drinking Water, SWRCB
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Mindy Boele, City of Vacaville
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Savita Chaudhary, City of Vacaville

Appendix 2

Scope of Accreditation for ELAP Certificate No. 1952



CALIFORNIA STATE
ENVIRONMENTAL LABORATORY ACCREDITATION PROGRAM
Fields of Accreditation



City of Vacaville Water Quality Laboratory

Utilities
6040 Vaca Station Road
Elmira, CA 95625
Phone: 7074696439

Certificate Number: 1952
Expiration Date: 12/31/2026

Field of Accreditation:101 - Microbiology of Drinking Water

101.010	002	Heterotrophic Bacteria	SimPlate
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Field of Accreditation:102 - Inorganic Chemistry of Drinking Water

102.095	001	Turbidity	SM 2130 B-2001
102.100	001	Alkalinity	SM 2320 B-1997
102.121	001	Hardness	SM 2340 C-1997
102.130	001	Specific Conductance	SM 2510 B-1997
102.140	001	Residue, Filterable TDS	SM 2540 C-1997
102.175	001	Chlorine, Free	SM 4500-Cl G-2000
102.175	002	Chlorine, Total Residual	SM 4500-Cl G-2000
102.200	001	Fluoride	SM 4500-F C-1997
102.203	001	Hydrogen Ion (pH)	SM 4500-H+ B-2000

Field of Accreditation:107 - Microbiological Methods for Non-Potable Water and Sewage Sludge

107.050	001	Total Coliform (Enumeration)	SM 9221 B-2014
107.068	001	E. coli (Enumeration)	SM 9223 B-2016 Colilert

Field of Accreditation:108 - Inorganic Constituents in Non-Potable Water

108.059	001	Turbidity	SM 2130 B-2011
108.063	001	Alkalinity	SM 2320 B-2011
108.067	001	Hardness	SM 2340 C-2011
108.069	001	Specific Conductance	SM 2510 B-2011
108.070	001	Residue, Total	SM 2540 B-2015
108.072	001	Residue, Filterable TDS	SM 2540 C-2015
108.074	001	Residue, Non-filterable TSS	SM 2540 D-2015
108.080	001	Temperature	SM 2550 B-2010
108.105	001	Chlorine, Total Residual	SM 4500-Cl C-2011
108.114	001	Chlorine, Total Residual	SM 4500-Cl G-2011
108.137	001	Hydrogen Ion (pH)	SM 4500-H+ B-2011
108.139	001	Ammonia (as N)	SM 4500-NH3 C-2011
108.206	001	Biochemical Oxygen Demand	SM 5210 B-2016