CIM 2013 to Present

Lack of Compliance with Legal and Regulatory Requirements

Although the United States Environmental Protection Agency (USEPA) is responsible for enforcing water quality laws and regulations, it is allowed to delegate primary responsibility for such enforcement to state agencies. California is one of the states that has been delegated that responsibility. California's regulations are in Title 22 which parallels the Federal regulations, frequently word for word. Primary states are permitted to strengthen the Federal requirements but are not permitted to weaken them. The state agency empowered with enforcement is the Division of Drinking Water (DDW) which is a division of the State Water Resources Control Board (SWRCB).

The California Institution for Men (CIM) in Chino, CA has its own water system which provides water from onsite wells. CIM has a Water Treatment Plant (WTP) which operates under a DDW permit to treat the well water to make it potable. CIM does not have access to municipal water from the City of Chino. For over a decade CIM has been failing to test the water provided to inmates, staff and visitors according to requirements and has been falsifying required reports to hide their failures.

The DDW maintains databases which contain test results provided by laboratories – the Safe Drinking Water Information System (SDWIS). It supports a public portal allowing access to this data called the California Drinking Water Watch. The CIM data in SDWIS can be accessed at:

https://sdwis.waterboards.ca.gov/PDWW/JSP/WaterSystemDetail.jsp?tinwsys_is_number=3862&tinwsys_st_code=CA&wsnumber=CA3610850

Regulations require an annual report be made to a water system's consumers. Title 22 § 64481 contains the requirements for the contents of this annual report - the Consumer Confidence Report (CCR). The Federal equivalent of these requirements are In 40 CFR 141 Subpart O—Consumer Confidence Reports beginning at § 141.151.

Title 22 § 64481(c) states "If any of the following are detected, information for each pursuant to subsection (d) shall be included in the Consumer Confidence Report." Essentially, this means that CIM is required to report the results of detected contaminants-constituents in the CCR if they have tested for them regardless of whether the testing is required or not. There are multiple examples below of CIM's failure to report detected contaminants-constituents in CCRs, violating the referenced section. Further, Title 22 § 64481(d) (2) D states "the sample result(s) collected at compliance monitoring sampling points … shall be reported …" See the discussions below with respect to the failure of CIM to report trichloropropane (TCP) detections at Granular Activated Carbon (GAC) vessel effluent ports. These samples are required to be collected by the terms of their permit.

Title 22 § 64483 requires CIM, within 3 months of the distribution of the CCR, provide "a certification that the report has been distributed to customers, and **that the information is correct** and **consistent** with the compliance monitoring data previously submitted to the State

Board." [Emphasis added] The Federal equivalent of this requirement is in 40 CFR § 141.155 'Report delivery and recordkeeping" paragraph (c).

The California Health and Safety Code (HSC) § 116730 addresses the act of "knowingly" making "any false statement or representation in any application, record, report, or other document submitted, maintained, or used for the purposes of compliance with this chapter." The Federal equivalent to this section is 18 USC 1001.

A CDCR Public Record ACT (PRA) request (I013405-111423) that included the 216 weekly (Wednesday) Distribution System laboratory reports for samples collected on November 13, 2013 through December 27, 2017 was made on November 14, 2023. It is "In Progress". These reports have a minimum 10-year retention requirement. Title 22 § 64470, with respect to record retention, requires at (b) (1) "Records of … chemical analyses from at least the most recent 10 years" be retained. CIM initially reported "water staff are currently confirming if we still have records at our archive connex area. Should we find that records have not been purged you will be notified via the PRA Portal." No records have been provided. The willful destruction (purge) of any record required to be maintained by the California Health and Safety Code is a violation of that code. See HSC § 116730 (a) (3) and the penalties (PLURAL) for the second and subsequent violations are in HSC § 116730 (b). If and when the requested reports are provided, the number of unreported detected contaminants is likely to increase.

Sodium and Hardness Reporting Errors

CIM's WTP treats Hardness by permit using sodium chloride. Additionally, the Anion Exchange process to reduce Nitrate levels (also by permit) introduces sodium chloride in that treatment process. Both sodium and hardness levels are required by title 22 § 64481(4) to be included in the system's CCR. Title 22 § 64449 (b) requires that the monitoring for sodium and hardness be at the "distribution system entry points" that are "representative of the effluent of source treatment." (It is permissible to provide pre-treatment results for treated constituents as long as the post-treatment numbers are provided, and the pre-treatment numbers are clearly identified and separate from the post-treatment information. Title 22 § 64481 (d) states "… Any additional monitoring results that a water system chooses to include in its Consumer Confidence Report shall be displayed separately." Throughout the CCR discussions below, both sodium and hardness data is incorrectly derived from source well result data and not the treated effluent and/or distribution system results.

CIM's reporting failures are:

A) In 2013, CIM failed to comply with the reporting requirements in Title 22 **§** 64423.1 (c).

Firstly, In the CIM July 2013 "Monthly Summary of Distribution System Coliform Monitoring" report, dated August 6, 2013, with respect to the Total Coliform (TC) Maximum Contaminant Level (MCL), CIM falsely reported in 4 (c) that the system was "in compliance with monthly MCL" despite reporting 2 TC positive samples (of 16) and where that form states "if two or more samples are total coliform positive, then the MCL is violated." CIM was issued a violation on August 8, 2014, for the July 2013 TC MCL event.

Secondly. Truesdail Laboratories, Inc., a Certified Laboratory, replaced Excelchem Environmental Labs effective August 1, 2013. Title 22 **§** 64423.1 (c) (2) states "the water supplier shall require the laboratory to submit copies of all required bacteriological monitoring

results directly to the State Board" by the tenth day of the following month for water systems serving less than 33,000 people. CIM violated § 64423.1 (c) (2) by not informing Truesdail that **§** 64423.1 (c) (2) applied to CIM's reports.

Thirdly, TC was present in 2 0f 16 samples collected August 28, 2013, another MCL violation. Truesdail reported the TC MCL violation to CIM on August 30 when it requested confirmation samples to be collected. To conceal the TC MCL violation, and in violation of § 64423.1 (c**)**, CIM deliberately did not submit their own August monthly report (due on or before September 10 per Title 22 **§** 64423.1 (c)) to the SWRCB. CIM supplied the August report only after the SWRCB noticed, during a year-end audit, that CIM had not provided the August report. CIM faxed the August report on Saturday December 21, 2013, at 4:52 am 3 months and 11 days after the required date. In that report, CIM falsely reported (again) in 4 (c) that the system was "in compliance with monthly MCL" despite reporting 2 TC positive samples and where that form states "if two or more samples are total coliform positive, then the MCL is violated." CIM was issued a violation on January 3, 2014, for the August 2013 TC MCL event. The TC MCL violations are referenced at this SWRCB site:

https://sdwis.waterboards.ca.gov/PDWW/JSP/Violations.jsp?tinwsys_is_number=3862&tinwsys_st_code=CA

B) Title 22 § 64481 (d) (2) (D) 1 A specifies the range reporting requirements for CCRs. Based on comparisons of SDWIS1 data with the 2014 CCR, the following contaminants have incorrect range data (low, high or both) in the 2014 CCR. The table below and similar tables for subsequent years have the CCR's range data with the CCR value that conflicts with the laboratory result **bolded**, the units (e.g. parts per million), a sample collection date, that sample's laboratory result, the location where that sample was collected and the name of the State Certified Laboratory that performed the analysis. Just one sample result is shown for each contaminant where that result is outside the CCR range. Many of the listed contaminants have additional sample results that are also outside of the CCR range:

	CCR Range	Unit	Sampled	Result	Location	Lab
Hardness	**284.50**-333.57	ppm	11/03/14	73	WTP T/E	ALS Global USA

The section above "**Sodium and Hardness Reporting Errors**" applies to the 2014 CCR.

Haloacetic Acids	1.71 – **1.71**	ppb	01/02/14	4.31	DBPR Sample	ALS Global USA
Nitrate (As NO3)	**69.87** – 79.74	ppb	03/24/14	11.8	WTP T/E	ALS Global USA
PCE	0.91 – **1.82**	ppb	11/19/14	2.82	WTP T/E	ALS Global USA
Sulfate	**65** – 74	ppm	04/02/14	17	WTP T/E	ALS Global USA
Tot. Dissol Solids	451 – **495**	ppm	04/10/14	710	Well 11A	ALS Global USA

C) Title 22 § 64481 specifies the content of the CCR. The 2015 CCR violated this section by failing to include the table for bacteria which had been in all prior and all subsequent CCRs. This table was named Table 1 – Sampling Results Showing the Detection of Coliform and Bacteria. The 2015 CCR renumbered the remaining tables to "hide" the fact that the table was missing.

Based on comparisons of SDWIS2 data and just one of the 52 Distribution System reports with the 2015 CCR, the following contaminants-constituents have incorrect range data (low, high or both) in the 2015 CCR (Again, only one sample result shown for each):

	CCR Range	Unit	Sampled	Result	Location	Lab
Sodium	27.32 – **29.83**	ppm	10/07/15	76	Facility B	TestAmerica
Hardness	**261.67** – 300	ppm	03/30/15	25	WTP T/E	ALS Global USA

The section above "**Sodium and Hardness Reporting Errors**" applies to the 2015 CCR.

Arsenic	ND – **1.67**	ppb	10/15/15	3.1	Well 03	Eurofins Calscience
Barium	**.00011**-.00012	ppm	04/01/15	ND	Reservoir	ALS Global USA
Beryllium	ND – **0.4**	ppb	04/01/15	ND*	Reservoir	ALS Global USA
Cadmium	ND – **1.12**	ppb	04/01/15	ND*	Reservoir	ALS Global USA
Chromium	ND – **7.80**	ppb	07/08/15	15	Well 01A	Eurofins Calscience
Chlorine	0.91 – **1.42**	ppm	10/07/15	1.58	Facility C	TestAmerica
Cyanide	ND – **25**	ppb	04/01/15	ND*	Reservoir	ALS Global USA
Fluoride	0.11 – **0.19**	ppm	04/01/15	0.279	Well 03	ALS Global USA
Nitrate (as N)	4.22 – **6.84**	ppm	04/13/15	8.475	WTP T/E	ALS Global USA
Selenium	5.68 – **6.93**	ppb	07/08/15	12	Well 01A	Eurofins Calscience
PCE	1.27 – **3.31**	ppb	09/16/15	3.4	WTP T/E	Eurofins Calscience
TCE	**0.50 – 0.85**	ppb	01/07/15	ND*	Reservoir	ALS Global USA

* All SDWIS2 results for all sample locations are ND

Aluminum	10 – **38.17**	ppb	10/07/15	160	Well 11A	Eurofins Calscience
Chloride	52.10 – **54.78**	ppm	10/07/15	120	Reservoir	Eurofins Calscience
Iron	50 – **140**	ppb	04/01/15	1270	Well 11A	ALS Global USA
Manganese	1.63 – **7.13**	ppb	10/07/15	36	Well 11A	Eurofins Calscience
Specific cond.	**695** – 772	uS/cm	04/01/15	616	Reservoir	ALS Global USA
Sulfate	**64.68** – 68.21	ppm	09/16/15	3.5	WTP T/E	Eurofins Calscience
Tot. Dissol Solids	**467** – 511	ppm	04/01/15	352	Reservoir	ALS Global USA
Turbidity	0.20 – **1.0**	Units	10/07/15	5.2	Well 11A	Eurofins Calscience
Zinc	**0.01** – 0.03	ppm	10/07/15	ND	Facility B	TestAmerica

CIM failed to report the following in the 2015 CCR:

Copper (free), a secondary contaminant, was detected at 36 µg/L (ppb) at Facility B in a sample from October 7 and reported by TestAmerica in report 440-123522.

D) Based on comparisons of SDWIS2 data and data from extracted pages from14 of the 52 Distribution System reports (Chlorine only) with the 2016 CCR, the following contaminants-constituents have incorrect range data (low, high or both) in the 2016 CCR (Again, one 2016 sample result shown for each):

	CCR Range	Unit	Sampled	Result	Location	Lab
Sodium	25.20 – **30.00**	ppm	10/05/16	97	Reservoir	Eurofins Calscience
Hardness	**288.33** – 318	ppm	03/16/16	26	WTP T/E	Eurofins Calscience

The section above "**Sodium and Hardness Reporting Errors**" applies to the 2016 CCR.

Arsenic	1.08 – **1.83**	ppb	07/06/16	3.9	Well 03	Eurofins Calscience

Barium	**112.33**-117.80	ppm	01/06/16	ND	WTP T/E	Eurofins Calscience
Beryllium	**0.50** – **0.50**	ppb	01/06/16	ND*	WTP T/E	Eurofins Calscience
Cadmium	**1.00** – **1.00**	ppb	01/06/16	ND*	WTP T/E	Eurofins Calscience
Chromium	6.82 – **7.78**	ppb	10/05/16	11	Well 16	Eurofins Calscience
Chlorine	1.11 – **1.68**	ppm	03/23/16	2.20	Facility A	TestAmerica
Cyanide	**5.00** – **25.00**	ppb	01/06/16	ND*	WTP T/E	Eurofins Calscience
Fluoride	0.16 – **0.17**	ppm	10/05/16	0.22	Reservoir	Eurofins Calscience
Nitrate (as N)	3.47 – **4.22**	ppm	11/14/16	8.6	Reservoir	Eurofins Calscience
Selenium	5.92 – **6.53**	ppb	01/06/16	11	Well 01A	Eurofins Calscience
PCE	**0.74** – 1.24	ppb	01/06/16	ND	WTP T/E	Eurofins Calscience
TCE	**0.50** – **0.50**	ppb	01/06/16	ND*	WTP T/E	Eurofins Calscience

* All SDWIS2 results for all sample locations are ND; All 3 TCE Distribution System results are ND

Aluminum	**12.00** – 28.33	ppb	01/06/16	ND	WTP T/E	Eurofins Calscience
Chloride	45.60 – **51.60**	ppm	04/06/16	130	Reservoir	Eurofins Calscience
Color	**1.0** - 3.50	units	01/06/16	ND	WTP T/E	Eurofins Calscience
Iron	**0.04** – 0.25	ppb	01/06/16	ND	WTP T/E	Eurofins Calscience
Manganese	**3.24** – 8.82	ppb	01/06/16	ND	WTP T/E	Eurofins Calscience
Specific cond.	**651.67**-726.00	uS/cm	10/05/16	610	Reservoir	Eurofins Calscience
Sulfate	**64.60** – 77.00	ppm	05/30/16	7.2	WTP T/E	Eurofins Calscience
Tot. Dissol Solids	**456.67**-498.00	ppm	08/10/16	350	Reservoir	Eurofins Calscience
Turbidity	0.32 – **0.59**	units	06/22/16	0.62	Facility D	TestAmerica
Zinc	**20.00** – 20.00	ppm	01/06/16	ND	WTP T/E	Eurofins Calscience

The 2016 CCR's Table 2 – Sampling Results Showing the Detection of Lead and Copper documented the failure of CIM to follow the testing regulations for lead tap samples per Title 22 § 64673 (e) (2). Because of the exceedance reported in the previous test cycle in 2013, CIM was required to "resume standard tap sampling" (40 sites) instead of using the reduced site list (20 sites). CIM only collected 20 samples in 2016. Additionally, CIM falsely reported 1 Action Level exceedance when there were 2.

CIM failed to report the following in the 2016 CCR:

Mercury, a primary contaminant, was detected at 1.7 µg/L (ppb) at the reservoir. The sample was collected on April 6 and analyzed by EUROFINS CALSCIENCE. The result is documented in SDWIS2. Mercury's DLR is 1 µg/L and its MCL is 2 ug/L.

Nitrite, a primary contaminant, was detected at 0.85 mg/L (ppm) in the treatment plant's treated effluent. The sample was collected on January 5 and analyzed by EUROFINS CALSCIENCE. The result is documented in SDWIS2. Nitrite's DLR is 0.4 mg/L and its MCL is 1 mg/L. Also on January 6, a sample was collected at Facility A which was analyzed by TestAmerica with an identical nitrite result of 0.85 mg/L. That result is documented in TestAmerica's report with the ID of 440-160730.

Copper (free), a secondary contaminant, was detected at 22 µg/L (ppb) at Facility B in a sample from October 10 and reported by TestAmerica in report 440-160730.

Foaming Agents (Surfactants), a secondary contaminant, were detected at 0.12 mg/L (ppm) at the reservoir in a sample from July 6 and reported by EUROFINS CALSCIENCE. The

result is documented in SDWIS2.

E) Based on comparisons of SDWIS2 data and CIM's 2018 first Quarterly Report for Disinfectant Residuals Compliance (Chorine) (April to December 2017 data) with the 2017 CCR, the following contaminants-constituents have incorrect range data (low, high or both) in the 2017 CCR (Again, one 2017 sample result shown for each):

	CCR Range	Unit	Sampled	Result	Location	Lab
Sodium	27.33 – **27.48**	ppm	04/05/17	110	Reservoir	Eurofins Calscience
Hardness	**271.67**-295.00	ppm	01/06/17	46	WTP T/E	Eurofins Calscience

The section above "**Sodium and Hardness Reporting Errors**" applies to the 2017 CCR.

Arsenic	1.18 – **1.44**	ppb	07/05/17	3.87	Well 03	ALS Global USA
Barium	0.08 – **0.11**	ppm	04/05/17	0.18	Well 15	Eurofins Calscience
Beryllium	**0.5** – **1.0**	ppb	01/04/17	ND*	Reservoir	Eurofins Calscience
Cadmium	**1.00** – **1.00**	ppb	01/04/17	ND*	WTP T/E	Eurofins Calscience
Chromium	7.35 – **8.53**	ppb	01/04/17	12	Well 1	Eurofins Calscience
Chlorine	**1.02** – 1.33	ppm	09/xx/17	0.91	Monthly Avg.	CIM Report
Cyanide	**0.01** – **5.00**	ppb	01/04/17	ND*	WTP T/E	Eurofins Calscience
Fluoride	0.13 – **0.16**	ppm	04/05/17	0.2	Reservoir	Eurofins Calscience
Nitrate (as N)	3.4 – **4.0**	ppm	07/17/17	8.5	WTP T/E	ALS Global USA
Selenium	5.75 – **6.38**	(ppb)	07/05/17	10.9	Well 01A	ALS Global USA
PCE	0.61 – **1.39**	ppb	03/01/17	2.1	Reservoir	Eurofins Calscience
TCE	**0.50** – **1.00**	ppb	01/04/17	ND*	Reservoir	Eurofins Calscience

* All SDWIS2 results for all sample locations are ND

Aluminum	0.05 – **22.83**	ppb	04/05/17	140	Well 11A	Eurofins Calscience
Chloride	41.50 – **55.90**	ppm	10/04/17	130	Reservoir	ALS Global USA
Color	1.20 – **1.75**	units	01/04/17	5	WTP T/E	Eurofins Calscience
Iron (**MCL 300**)	0.02 – **0.06**	ppb	04/05/17	**450**	Well 11A	Eurofins Calscience
Manganese	**1.14** – **1.90**	ppb	01/04/17	ND*	Reservoir	Eurofins Calscience
Specific cond.	**681.67**-732.20	uS/cm	04/05/17	620	Reservoir	Eurofins Calscience
Sulfate	**61.83** – 73.08	ppm	04/05/17	7.2	Reservoir	Eurofins Calscience
Tot. Dissol Solids	**430.00**-502.00	ppm	04/05/17	350	Reservoir	Eurofins Calscience
Turbidity	0.13 – **0.14**	units	05/03/17	0.38	WTP T/E	Eurofins Calscience
Zinc (MCL 5)	0.02 – **20.00**	ppm	04/05/17	0.11	Well 15	Eurofins Calscience

CIM failed to report the following in the 2017 CCR:

Copper (free), a secondary contaminant, was detected at 2.87 µg/L (ppb) at the reservoir in a sample from October 4 and reported by ALS Global USA. The result is documented in SDWIS2.

F) The 2018 CCR had 3 versions. V1 was published on or about June 10, 2019, dated "6/2019".

On 6/30/2019, the SWRCB/DDW "Professional Engineer" (PE) who supervised CIM was told by letter of multiple range errors in V1 based solely on Truesdail Laboratory reports for April 2018 through July 2018 and the 5/30/2018 CIM Nitrate "Problem Corrected" notice. SDWIS2

data and the full set of weekly/Wednesday Distribution System reports were not available at the time of the 6/30/2019 letter was written. That letter reported:

Table 1 contradicts the e.coli statements on page 9.

Table 2 repeats the [2016] false number of lead exceedances - only 1 vs actual 2.

Table 3	CCR Range	Lab Range
Sodium Lab low date and location: 7/11 Fac C Lab High date and location: 4/11 Fac D	26.0 - 31.95	74.1 - 80.7
Hardness Lab low date and location: 6/13 Fac A Lab High date and location: 7/18 Fac A	205 – 282	125 – 342

Table 4	CCR Range	Lab Range
Arsenic Lab dates and locations: 4/11 Fac D & 7/11 Fac C	1.32 - 2 .31	ND
Barium Lab low date and location: 7/11 Fac C Lab High date and location: 4/11 Fac D	.000100-.000111	48.3 - 64.9
Beryllium Lab dates and locations: 4/11 Fac D & 7/11 Fac C	1 – 1	ND
Cadmium Lab dates and locations: 4/11 Fac D & 7/11 Fac C	1 – 1	ND
Chromium Lab low date and location: 4/11 Fac D Lab High date and location: 7/11 Fac C	5.98 - 7.06	ND - 2.16
Chlorine Lab low date and location: 5/16 Fac A Lab High date and location: 6/13 Fac C	0.99 - 1.05	0.77 – 1.62
Cyanide Lab dates and locations: 4/11 Fac D & 7/11 Fac C	0.01 - 0.01	ND
Fluoride Lab low date and location: 4/11 Fac D Lab High date and location: 7/11 Fac C	0.11 - 0.19	0.114 - 0.133

Nitrate (as N)	12.6 - 17.87	3.27 - 47
Lab low date and location: 5/09 Fac A		
Lab High date and location: 5/14 WTP T/E		
Selenium	5.1 - 6.53	ND
Lab dates and locations: 4/11 Fac D & 7/11 Fac C		
PCE	0.83 - 1.39	ND
Lab dates and locations: 4/11 Fac D & 7/11 Fac C		
TCE	0.5 - 0.5	ND
Lab dates and locations: 4/11 Fac D & 7/11 Fac C		

No laboratory data was available on 6/30/2019 for HAAs, TTHMs, and Trichloropropane.

In the second week of July 2019, V2 was published backdated to 6/25/2019. The only change was the deletion of page 9 of 9 and the change to the header on pages 2 through 8 replacing “Page n of 9” with ”Page n of 8.” None of the range data errors listed above and reported in the 6/30/2019 letter were corrected.

After more than a month without further action, on 8/18/2019, a follow-up letter was sent to the same SWRCB/DDW PE. That letter summarized the reporting errors in V2 of the CIM 2018 CCR. A blind copy was sent to Mr. Jared Blumenfeld, the California Secretary of Environmental Protection. The only action by the SWRCB was the reassignment of the supervising PE to other duties. During the fall of 2019, a series of letters was exchanged with the US EPA about the range reporting errors. On 12/2/2019, the US EPA agreed that there were “reporting errors” by CIM. The US EPA stated that the SWRCB had agreed to issue a violation to CIM for the reporting errors and **require reissuance** of the 2018 CCR with corrections.

Based on comparisons of SDWIS2 data and all 53 weekly/Wednesday laboratory reports (1/3/2018 – 12/26/2018) with the 2018 CCR, the following contaminants-constituents had incorrect range data (low, high or both) in V2 of the 2018 CCR (Again, one 2018 sample result shown for each):

	CCR Range	Unit	Sampled	Result	Location	Lab
Sodium	26.0 – **31.95**	ppm	10/03/18	99.8	Reservoir	ALS Global USA
Hardness	**205** – 282	ppm	06/20/18	54	Reservoir	ALS Global USA

The section above “**Sodium and Hardness Reporting Errors**” applies to V1 and V2 of the 2019 CCR.

Arsenic	**1.32** – 2.31	ppb	07/11/18	ND	Well 01A	ALS Global USA
Barium	.000100-.**000111**	ppm	01/10/18	0.161	Well 15	ALS Global USA
Beryllium	**1** – **1**	ppb	04/04/18	ND*	Reservoir	ALS Global USA
Cadmium	**1** – **1**	ppb	04/04/18	ND*	Reservoir	ALS Global USA

Chromium**	**5.98** – 7.06	ppb	07/11/18	ND	Well 01A	ALS Global USA
Chlorine	.99 – **1.05**	ppm	09/05/18	1.92	Facility B	Truesdail Laboratories
Cyanide	**0.01** – **0.01**	ppb	04/04/18	ND*	Reservoir	ALS Global USA
Fluoride	0.11 – **0.19**	ppm	01/10/18	0.268	Well 15	ALS Global USA
HAAs	4.7 – **20.95**	ppb	08/08/18	23.4	DBPR Sample	ALS Global USA
Nitrate (as N)	12.6 – **17.87**	ppm	05/16/18	43.5	WTP T/E	ALS Global USA
Selenium	**5.1** – 6.53	(ppb)	07/11/18	ND	Well 03	ALS Global USA
PCE	**0.83** – 1.39	ppb	02/07/18	ND	WTP T/E	ALS Global USA
TCE	**0.5** – **0.5**	ppb	01/24/18	ND*	Reservoir	ALS Global USA
TTHMs	**3.28** – **7.2**	ppb	08/08/18	2.65	DBPR Sample	ALS Global USA
TCP***	0.03 – **0.038**	ppb	01/28/18	0.040	WTP T/E	Truesdail Laboratories

* All SDWIS2 results for all sample locations are ND
** All results for Chromium were below DLR and it should not have been listed.
*** See Section IV - Paragraph 8 - Treatment Plant Shut Down for extensive details about this MCL Violation

Aluminum	**0.02** – **0.03**	ppb	01/10/18	ND*	Well 01A	ALS Global USA
Chloride	44.43 – **46.5**	ppm	04/04/18	150	Reservoir	ALS Global USA
Color	1.0 – **1.06**	units	01/31/18	8	Facility D	Truesdail Laboratories
Iron	0.01 – **0.01**	ppb	04/11/18	24.7	Facility D	Truesdail Laboratories
Manganese	1.0 – **1.13**	ppb	04/11/18	4.13	Facility D	Truesdail Laboratories
Specific cond.	585.02-**681.75**	uS/cm	07/11/18	882	Well 15	ALS Global USA
Sulfate	**62.83** – 71.05	ppm	10/03/18	10.6	WTP T/E	ALS Global USA
Tot. Dissol Solids	424.67-**470.79**	ppm	01/10/18	648	Well 15	ALS Global USA
Turbidity	0.10 – **0.12**	units	01/31/18	0.801	Facility D	Truesdail Laboratories
Zinc	**0.01** – 0.02	ppm	04/04/18	ND	Reservoir	ALS Global US

* All SDWIS2 results for all sample locations are ND

V3 was published on 12/31/2019 ostensibly to correct the “reporting errors” in V2. The violation issued by the SWRCB for the “reporting errors” DID NOT ADDRESS the multiple range errors in the 2018 CCR. Instead, it admonished CIM for calculating the “level detected” incorrectly for some contaminants by computing that level as the average of all samples rather than the average of the location averages. V3 of the 2018 CCR is available at:

https://ear.waterboards.ca.gov/Home/ViewCCR?PwsID=CA3610850&Year=2018&isCert=false

V3 of the 2018 CCR changed range data for the following 11 contaminants-constituents. Where V3’s new range data (4 of the 11) no longer conflicted with the referenced laboratory data, the CCR Range shown without bolding. Revised but still incorrect CCR values are **bolded**. The laboratory results from the V2 comparison above are included here (unchanged):

	CCR Range	Unit	Sampled	Result	Location	Lab
Sodium	23.5- – **33.10**	ppm	10/03/18	99.8	Reservoir	ALS Global USA
Hardness	**150** – 360	ppm	06/20/18	54	Reservoir	ALS Global USA

The section above "**Sodium and Hardness Reporting Errors**" applies to V3 of the 2016 CCR.

Arsenic	**1.00** – 3.66	ppb	07/11/18	ND	Well 01A	ALS Global USA
Barium	.000061-.**000161**	ppm	01/10/18	0.161	Well 15	ALS Global USA
Chromium**	5.14 – 8.73	ppb	01/10/18	8.73	Well 1	ALS Global USA
Chlorine	1.08 – **1.29**	ppm	09/05/18	1.92	Facility B	Truesdail Laboratories
Fluoride	0.10 – 0.27	ppm	01/10/18	0.268	Well 15	ALS Global USA
Nitrate (as N)	3.25 – 43.5	ppm	05/16/18	43.5	WTP T/E	ALS Global USA
Selenium	**2.0** – 11.50	(ppb)	07/11/18	ND	Well 03	ALS Global USA
PCE	0 – 1.2	ppb	02/07/18	ND	WTP T/E	ALS Global USA
TCP	0.00 – **0.038**	ppb	01/28/18	0.040	WTP T/E	Truesdail Laboratories

** All results for Chromium were below DLR and it should not have been listed.

V3 of the 2018 CCR did not change the range data for the following contaminants. None should have been listed as they were Not Detected. The laboratory results from the V2 comparison above are included here (unchanged):

Beryllium	**1** – **1**	ppb	04/04/18	ND*	Reservoir	ALS Global USA
Cadmium	**1** – **1**	ppb	04/04/18	ND*	Reservoir	ALS Global USA
Cyanide	**0.01** – **0.01**	ppb	04/04/18	ND*	Reservoir	ALS Global USA
TCE	**0.5** – **0.5**	ppb	01/24/18	ND*	Reservoir	ALS Global USA

* All SDWIS2 results for all sample locations are ND

V3 of the 2018 CCR did not change the range data for the following contaminants-constituents. The range data remained incorrect. The laboratory results from the V2 comparison above are included here (unchanged):

HAAs	4.7 – **20.95**	ppb	08/08/18	23.4	DBPR Sample	ALS Global USA
TTHMs	**3.28** – **7.2**	ppb	08/08/18	2.65	DBPR Sample	ALS Global USA

V3 of the 2018 CCR changed range data for the following secondary contaminants-constituents. V3's new range data for Specific Conductance no longer conflicted with the laboratory data, and its CCR Range is no longer bolded. Revised but still incorrect CCR values are **bolded**. The laboratory results from the V2 comparison above are included here (unchanged):

Aluminum	**0.02** – **0.05**	ppb	01/10/18	ND*	Well 01A	ALS Global USA
Chloride	19.30 – **75.40**	ppm	04/04/18	150	Reservoir	ALS Global USA
Color	1.0 – **2.00**	units	01/31/18	8	Facility D	Truesdail Laboratories
Iron	0.01 – **0.02**	ppb	04/11/18	24.7	Facility D	Truesdail Laboratories

Manganese	1.0 – **2.63**	ppb	04/11/18	4.13	Facility D	Truesdail Laboratories
Specific cond.	441 – 882	uS/cm	07/11/18	882	Well 15	ALS Global USA
Sulfate	**30.60** – 103.00	ppm	10/03/18			10.6 WTP T/E ALS Global USA
Tot. Dissol Solids	424.67-**470.79**	ppm	01/10/18	648	Well 15	ALS Global USA
Turbidity	0.10 – **0.25**	units	01/31/18	0.801	Facility D	Truesdail Laboratories

* All 15 SDWIS2 and the 4 Quarterly (Wednesday) Aluminum results for all sample locations are ND. Aluminum should not have been listed.

V3 of the 2018 CCR did not change the range data for Zinc, a secondary contaminant. The range data remained incorrect**.** The laboratory result from the V2 comparison above are included here (unchanged):

Zinc	**0.01** – 0.02	ppm	04/04/18	ND	Reservoir	ALS Global US

V3 of the 2018 CCR partially corrected the false 2016 lead tap sample results which were in Table 2. The number of sites with an Action Level exceedance was corrected (from 1 to 2) but the "2" was required to have an asterisk (it did not) and "additional information" should have been placed in the Summary Information Table since the 2016 CCR stated "NONE" in that table.

CIM failed to report the following in all 3 versions of the 2018 CCR:

Copper (free), a secondary contaminant, was detected at 44.4 µg/L (ppb) at Facility B in a sample from October 3 and reported by Truesdail Laboratories in their report 18J0004. The 2018 CCR should have this as the Secondary Table entry for copper (free)**:**

Sample Date: 1/10/2018 – 10/3/2018
Level Detected: 15.7 ppb
Range of Detections: ND – 44.4

One of the mandatory requirements relating to CCRs is in Title 22 § 64483 (c). That section requires that the Water System, within 3 months of publication of the CCR, certify 3 facts**:** that the CCR has been (1) distributed to customers, and that the information is (2) correct **and (3) consistent** with the compliance monitoring data previously submitted to the State Board. The certification of the 2018 V2 CCR was submitted to the SWRCB on or after 6/27/2019 which is the date next to Chief Engineer Isaac Morales' signature. The fact that CIM reissued the 2018 CCR with extensive changes is an admission that V2 was not correct and that the V2 certification was false. In addition, the data contained in the document "2018 4th Quarterly Report for Disinfectant Residuals Compliance" conflicted with the chlorine data in the V2 CCR. That compliance report was signed by Gregory Torres on 1/10/2019 and submitted to the SWRCB. The CCR was dated 6/25/2019. The Disinfectant Residuals Compliance document is, therefore, "compliance monitoring data previously submitted to the State Board." The certification of the 2018 CCR V3 was signed on 1/10/2020 by Robert Stockwell. Because there are extensive falsifications in V3 and because the chlorine data in V3 conflicts with the data in

the Disinfectant Residuals Compliance document, Stockwell's certification is false. Stockwell's signed 2018 V3 certification document is available at:

https://ear.waterboards.ca.gov/Home/ViewCCR?PwsID=CA3610850&Year=2018&isCert=true

G) The 2019 CCR fabrications and omissions are documented below. 2019's reporting failures received greater attention than the prior years due to ongoing litigation. The 2019 CIM CCR is available at:

https://ear.waterboards.ca.gov/Home/ViewCCR?PwsID=CA3610850&Year=2019&isCert=false

The **false certification by Stockwell** on July 1, 2020, that the 2019 CCR was "correct" is at

https://ear.waterboards.ca.gov/Home/ViewCCR?PwsID=CA3610850&Year=2019&isCert=true

The 2019 CCR had:

A) multiple inaccurate entries,

B) entries that should not have been included,

C) the absence of required entries in Table 4, Primary Contaminants,

D) the absence of required entries in Table 5, Secondary Contaminants,

E) the ABSENCE of Table 6, Unregulated Contaminants and

F) a missing entry in the Summary Information table on page 6.

All these inaccuracies reflect the failure of CIM to follow the regulations that specified the content of the CCR.

2019 CCR Contents Discussion in CCR Table order

Table 1 – Bacteria

Biological monitoring is part of the weekly/Wednesday Distribution System sample analysis for samples collected at the perimeter fences of Facilities A, B, C, and D (or at the "High Tank" adjacent to Facility D). See the file "Testing Regimen at CIM.docx".

No laboratory results from any of the 2019 weekly/Wednesday Distribution System tests are in the SDWIS3 database because their sampling points were NOT defined at the time the reports were uploaded to SDWIS by the State certified testing laboratory.

The file "2019 Distribution System Bacteriological Monitoring Summary.pdf" was provided by the SWRCB's Division of Drinking Water (DDW) in response to a Public Record Act (PRA) request for the 2019 weekly/Wednesday Distribution System testing results. That file's name is misleading as it contains the laboratory results for all contaminants/constituents tested for as part of the weekly/Wednesday Distribution System regimen. The pdf file has no results for Wednesday January 2, for all 5 Wednesdays in May, and for Wednesday August 14. There are January 2 sample results in the file, but they were for disinfectant byproducts analysis instead of the usual weekly/Wednesday Distribution System requests. The August 14 testing was devoted to extensive lead and copper tap sample collection and no weekly/Wednesday Distribution

System samples were collected. It is unknown why the DDW failed to include the 5 weeks of May test reports in the PRA response. A supplemental PRA request provided the January 2 and the 5 missing May reports. (Samples were collected on Tuesday 11/26 and Friday 12/27 instead of on Wednesday due to Thanksgiving and Christmas holidays.)

Both the DDW pdf file and the supplemental PRA response and the 2019 CCR show no detections of biological contaminants and the CCR is likely correct.

Table 2 – Lead and Copper Tap Sampling

2019 Lead and Copper Rule (LCR) samples were collected on 8/14/2019. Enthalpy Analytical, LLC performed the analysis. The 2019 CCR includes required language on page 3 of 6 "Any violation of an AL, MCL, MRDL, or TT is asterisked. Additional information regarding the violation is provided later in this report." In Table 2 – Sampling Results Showing the Detection of Lead and Copper, also on page 3, the "No. Sites Exceeding AL**"** for lead was listed as 2 but WITHOUT an asterisk. Page 6 of 6 has a table titled "Summary Information for Violation of a MCL, MRDL, AL, TT, or Monitoring and Reporting Requirement". That table does not mention the 2 lead AL exceedances.

Both the asterisk on the AL exceedance count and "additional information" were required by regulation but were improperly omitted. Title 22 § 64481 (d) (2) (D) (3) states "The table(s) shall clearly identify any data indicating violations of MCLs, regulatory action levels, MRDLs, or treatment techniques and the Consumer Confidence Report shall give information on each violation including the length of the violation, potential adverse health effects (PDWS only), and actions taken by the system to address the violation." (PDWS stands for Primary Drinking Water Standard.) The omitted information should have included the time frame for the exceedances which was "Since November 2013", information about the health risks to adults associated with lead exposure, and a description of the implementation of Corrosion Control to address the Action Level Exceedance.

Table 3 – Sodium and Hardness

Sodium was tested for downstream from the Water Treatment Plant quarterly as part of the weekly/Wednesday Distribution System testing regimen. There is no sodium data in SDWIS3 as the sampling points for the weekly/Wednesday Distribution System tests were not predefined in 2019. The most recent SDWIS data for sodium prior to 2019 was on 10/3/2018 in SDWIS2 where results from wells 01, 01A, 03, 15 and 16 and the reservoir (post-treatment) were documented. Ranges from 2018 for all 12 well samples were from 24.5 to 33.1 ppm with a location average of 28.8 ppm. The 3 reservoir samples from 2018 ranged from 74.0 to 99.8 ppm with an average of 86.4 ppm, a much higher level than the well concurrent data due to the introduction of sodium during treatment.

The 2019 CCR provided this sodium data:
Sample Date: 1/2019 – 10/2019
Level Detected: 30.99 ppm
Range of Detections: 24.90 – 37.10 ppm

The January 9, 2019 Distribution System sample result from Facility A was105 ppm as reported by ALS – Truesdail Laboratories (Work Order No: 19A0005). The April 3, 2019 Distribution System sample result from Facility D was102 ppm as reported by ALS – Truesdail Laboratories (Work Order No: 19D0015). The average of these results is 103.5 ppm. Both reports are in the

DDW provided PRA response file “2019 Distribution System Bacteriological Monitoring Summary.pdf”. Due to the change in testing laboratories to Enthalpy Analytical, LLC. effective July 1, 2019, there is NO DATA for sodium in the Enthalpy July 3 and October 2, 2019 quarterly reports – Lab Requests 416914 and 419935 respectively. (See the regimen change discussion in “Testing Regimen at CIM,docx”.)

The 2019 CCR sodium data is inaccurate. If it is based on unpublished data in the possession of CIM, it’s source can only be assumed to be PRE-TREATMENT and is inappropriate for the CCR. It is also possible that the data is COMPLETELY FABRICATED. The 2019 CCR should have provided this sodium data:

Sample Date: 1/9/2019 – 4/3/2019
Level Detected: 103.5
Range of Detections: 102 – 105

Hardness was tested for downstream from the Water Treatment Plant weekly as part of the weekly/Wednesday Distribution System testing regimen. As noted above in the bacteria discussion, there is no weekly/Wednesday Distribution System data for August 14. There is no hardness data in SDWIS3 for any weekly/Wednesday Distribution System dates as the sampling points were not defined in 2019. There is data in the DDW supplied PRA response containing the weekly/Wednesday Distribution System and the supplemental PRA response data for the other 51 weeks for each of the 4 Distribution System sample points.

SDWIS3 has post-treatment, blended input, and source well results for hardness. There are 58 results each from the sample points “TREATMENT PLANT – TREATED” and “RESERVOIR BLEND – DISTRIBUTION – TREATED”. There are 58 results for “TREATMENT PLANT – RAW” which is the pre-treatment, blended plant input and 29 results from samples obtained from 5 wells.

The 2019 CCR provided this hardness data:
Sample Date: 1/2019 – 10/2019
Level Detected: 295.81ppm
Range of Detections: 143.00 – 437.00 ppm

The 2019 CCR hardness data is inaccurate. It appears to be partly based on PRE-TREATMENT results. Hardness is treated for by permit using sodium chloride. Additionally, the Anion Exchange process to reduce Nitrate levels (also by permit) introduces sodium chloride in that treatment process. Both sodium and hardness levels are required by title 22 § 64481(4) to be included in the CCR. Title 22 § 64449 (g) requires that the monitoring for sodium and hardness be at the “distribution system entry points” that are “representative of the effluent of source treatment.” (It is permissible to provide pre-treatment results for treated constituents as long as the post-treatment numbers are provided, and the pre-treatment numbers are clearly identified and separate from the post-treatment information. Title 22 § 64481 (d) states “… Any additional monitoring results that a water system chooses to include in its Consumer Confidence Report shall be displayed separately. “) Note, there is NO RESULT in SDWIS3 with a value of 143 ppm, the 2019 CCR’s low. SDWIS3 shows the high pre-treatment result was 437.00 ppm from a sample collected at well 15 on July 3, 2019, at 10:00 am and reported by Enthalpy Analytical, Inc. How the CCR’s “Level Detected” of 295.81ppm was calculated is a mystery.

The correct hardness data based on the 116 post-treatment (58+58) WTP T/E and Reservoir samples and the 204 (51x4) weekly/Wednesday Distribution System results is:

Sample Date: 1/9/2019 – 12/30/2019
Level Detected: 123.59 ppm
Range of Detections: 71.00 – 260.00 ppm

The low of 71.00 was from Facility B from a weekly/Wednesday Distribution System sample collected on 1/30/2019 as reported by ALS – Truesdail Laboratories (Work Order No: 19A0589). The high of 260.00 was from the Water Treatment Plant treated effluent port (T/E) from a sample collected on 12/30/2019 at 9:05 am as reported by Enthalpy Analytical, Inc. in SDWIS3. (See "2019 Monthly Coliform Monitoring Report CONTENTS summary with CL and HARDNESS data.xlsx" and "2019 SDWIS3 Hardness Results.xlsx".)

Table 4 – Primary Contaminants

Arsenic is a primary contaminant with a DLR of 2 and an MCL of 10 ppb. It is NOT treated for by the CIM WTP. The 2019 CCR provided this arsenic data:

Sample Date: 1/2019 – 10/2019
Level Detected: 1.78 ppb
Range of Detections: 0.00 – 4.76 ppb

Arsenic was tested for downstream from the Water Treatment Plant **quarterly** as part of the weekly/Wednesday Distribution System testing regimen. The January 9 (Facility A) and April 3, 2019 (Facility D) weekly/Wednesday Distribution System samples were the input for the first quarter (Work Order No: 19A0005) and second quarter (Work Order No: 19D0015) reports from ALS – Truesdail Laboratories. (As discussed above in the bacteria discussion, there were no third and fourth quarter results.) Additionally, 4 wells (01A, 03, 15 and 16) were tested for arsenic on July 3, 2019, with the results from Enthalpy Analytical, Inc. uploaded to SDWIS3. Both weekly/Wednesday Distribution System sample results were "ND" (Not Detected) i.e. below DLR. The 4 well results ranged from 2.02 to 2.48 ppb. The location average of these 6 samples is 1.50 ppb which should be reported as ND since it is below the DLR. The Sample Dates are inaccurate. The 2019 CCR should have provided this arsenic data:

Sample Date: 1/9/2019 – 7/3/2019
Level Detected: ND
Range of Detections: ND – 2.48 ppb

The basis for the CCR's high of 4.76 ppb is unknown and is likely a FABRICATION.

Barium is a primary contaminant with a DLR of 0.1 and an MCL of 1 ppm. It is NOT treated for by CIM's WTP. The 2019 CCR provided this barium data:

Sample Date: 1/2019 – 10/2019
Level Detected: 0.000105 ppm
Range of Detections: 0.00059.1 – 0.000160 ppm

Note that there are 2 distinct decimal points in the range low making that value incomprehensible.

Barium was tested for downstream from the Water Treatment Plant **quarterly** as part of the weekly/Wednesday Distribution System testing regimen. The January 9 (Facility A) and April 3, 2019 (Facility D) weekly/Wednesday Distribution System samples were the input for the first quarter (Work Order No: 19A0005) and second quarter (Work Order No: 19D0015) reports from ALS – Truesdail Laboratories. (As discussed above in the bacteria discussion, there were no third and fourth quarter results.) Additionally, 4 wells (01A, 03, 15 and 16) were tested for barium on July 3, 2019, with the results from Enthalpy Analytical, Inc. uploaded to SDWIS3. Result units for these 6 samples were expressed by the reporting laboratories in either mg/L (ppm) or ug/L (ppb). Since the CCR properly used ppm, the barium results below will be shown as reported but ppb values are converted to ppm for consistency.

January 9 Facility A		0.0193 ppm (ND)
April 3 Facility D	30.4 ppb	0.0304 ppm (ND)
July 3 Well 03	0 ppb (ND)	ND
July 3 Well 01A	109 ppb	0.109 ppm
July 3 Well 16	133 ppb	0.133 ppm
July 3 Well 15	160 ppb	0.160 ppm

The average of these 6 results is 0.067 ppm. That value is below the DLR and therefore the "Level Detected" should be ND. The Sample Dates repeat the inaccurate dates in other table entries. The 2019 CCR should have provided this barium data:

Sample Date: 1/9/2019 – 7/3/2019
Level Detected: ND
Range of Detections: ND – 0.160 ppm

Chromium is a primary contaminant with a DLR of 10 and an MCL of 50 ppb. It is NOT treated for by CIM's WTP.

The January 9 (Facility A) and April 3, 2019 (Facility D) weekly/Wednesday Distribution System samples were the input for the first quarter (Work Order No: 19A0005) and second quarter (Work Order No: 19D0015) reports from ALS – Truesdail Laboratories. (As discussed above in the bacteria discussion, there were no third and fourth quarter results.) Additionally, 4 wells (01A, 03, 15 and 16) were tested for chromium on July 3, 2019, with the results from Enthalpy Analytical, Inc. uploaded to SDWIS3. All 4 well samples were reported as ND. The January 9 sample was also ND. The April 3 sample result was 1.58 ppb. Since that value was below the DLR, **ALL 6 results are ND**.

The 2019 CCR provided this chromium data:
Sample Date: 1/2019 – 10/2019
Level Detected: 7.4 ppb
Range of Detections: 4.67 – 13.10 ppb

These results are a total FABRICATION. The "Level Detected" (7.4 ppb) is below DLR and if accurate should have been reported as ND. The low (4.67 ppb) is also below DLR and if accurate should have been reported as ND. The basis for the high (13.10 ppb) is unknown. The Sample Dates repeat the inaccurate dates in other table entries. Chromium should NOT have been listed in the CCR primary table.

Fluoride is a primary contaminant with a DLR of 0.1 and an MCL of 2 ppm. It is NOT treated for by CIM's WTP.

Fluoride was tested for downstream from the Water Treatment Plant quarterly as part of the weekly/Wednesday Distribution System testing regimen. The January 9 (Facility A) and April 3, 2019 (Facility D) weekly/Wednesday Distribution System samples were the input for the first quarter (Work Order No: 19A0005) and second quarter (Work Order No: 19D0015) reports from ALS – Truesdail Laboratories. (As discussed above in the 2019 bacteria discussion, there were no third and fourth quarter results.) The treatment plant's blended (RAW) input was tested for fluoride on June 19, 2019, and 4 wells (01A, 03, 15 and 16) were tested for fluoride on July 3, 2019, with these 5 results from Enthalpy Analytical, Inc. uploaded to SDWIS3. The 2019 CCR provided this fluoride data:

Sample Date: 1/2019 – 10/2019
Level Detected: 0.16 ppm
Range of Detections: 0.0 – 0.31 ppm

A total of 7 samples were tested for fluoride: 2 by ALS – Truesdail Laboratories and 5 by Enthalpy Analytical, Inc. All 7 samples had results above DLR. The CCR Sample Date field repeats the inaccurate dates in other table entries. The 2019 CCR should have provided this fluoride data:

Sample Date: 1/9/2019 – 7/3/2019
Level Detected: 0.152 ppm
Range of Detections: 0.136 – 0.180 ppm

The basis for the CCR's level and range values is unknown, but they are likely a FABRICATION.

Nitrate (as Nitrogen) is a primary contaminant with a DLR of 0.4 and an MCL of 10 ppm. It is treated for by CIM by permit using Anion Exchange. Nitrate is sampled post-treatment at the Water Treatment Plant's Treated Effluent port (T/E), the Reservoir, and downstream at each Facility as part of the weekly/Wednesday Distribution System testing regimen. There is no nitrate data in SDWIS3 for the weekly/Wednesday Distribution System tests as the sampling points were not predefined in 2019. There is data in the DDW supplied PRA response containing the weekly/Wednesday Distribution System data for 45 weeks for each of the 4 Distribution System sample points and the supplemental PRA response provided data for 6 additional weeks. Again, as noted above in the 2010 bacteria discussion, there is no data for August 14. The 2019 CCR provided this nitrate data:

Sample Date: 2/25/2019 – 12/30/2019
Level Detected: 5.88 ppm
Range of Detections: 3.71 – 9.18 ppm

This CCR data is based solely on the 59 T/E samples in SDWIS3. The 59 Reservoir sample results in SDWIS3 and 204 Distribution System Facility sample results in the DDW PRA and supplemental PRA responses were ignored when preparing the CCR – a clear violation of the regulations. Title 22 § 64481 (d) (2) (D) 1 C states "For multiple sampling points, one or more of which has been sampled more than once and for which data is being summarized together on the Consumer Confidence Report: the average of the individual sampling point averages and

range of all the sample results." The Sample Dates are inaccurate. The following nitrate data includes the missing 263 (59 + 204) results:

Sample Date: 1/9/2019 – 12/30/2019
Level Detected: 5.30 ppm
Range of Detections: 2.78 – 9.18 ppm

Selenium is a primary contaminant with a DLR of 5 and an MCL of 50 ppb. It is NOT treated for by CIM's WTP. 4 wells (01A, 03, 15 and 16) were tested for selenium on July 3, 2019, with the results from Enthalpy Analytical, Inc. uploaded to SDWIS3. The 2019 CCR provided this selenium data:

Sample Date: 1/2019 – 10/2019
Level Detected: 6.27 ppb
Range of Detections: 0.0 – 12.0 ppm

The laboratory results for the 4 wells were 9.68, ND, 12.6 and 8.2 ug/L (ppb) respectively. The average for these results is 7.62 ppb. The Sample Dates repeat the inaccurate dates in other table entries. The 2019 CCR should have provided this selenium data:

Sample Date: 7/3/2019
Level Detected: 7.62 ppb
Range of Detections: ND – 12.6 ppm

1,2,3 TRICHLOROPROPANE (TCP) is a primary contaminant with a DLR and MCL of 0.000005 mg/L (ppm). It is treated for by CIM's WTP by permit using Granular Activated Carbon (GAC). Because of MCL violations in 2018, CIM was required to conduct bimonthly tests beginning July 1, 2019, for TCP at multiple sampling ports on the GAC vessels as an early warning process to detect a "breakthrough" of TCP - when the carbon media becomes saturated and is no longer able to sequester TCP. (CIM sampled these ports periodically during the first 6 months of 2019.) CIM has 6 GAC vessels. 3 are in use at any given time (the lead vessels) and 3 are backup (the lag vessels). The permit requires CIM to swap out ALL lead vessels when any bimonthly result from the effluent port of any lead vessel shows TCP is detected. The vessels removed from service were to have their carbon media replaced with ANSI certified "virgin" carbon. (i.e. not refurbished) The 3 sample points on each GAC vessel are NOT defined in SDWIS. This means that ALL laboratory results for the bimonthly GAC vessel samples were NOT entered into the SDWIS3 database when the reports were submitted electronically by the laboratory. The 2019 CCR provided this TCP data:

Sample Date: 1/2019 – 12/2019
Level Detected: 0.002 ppb
Range of Detections: 0.00 – 0.005 ppb
MCL: 0.005 ppb

Title 22 § 64481 (d) (2) (A) states "For detected regulated contaminants referenced … the table(s) shall include … the MCL expressed as a number equal to or greater than 1.0".

Title 22 § 64481 (d) (2) (D) requires that "… sample result(s) collected at compliance monitoring sampling points shall be reported in the same units as the MCL…."

These 2 regulation citations mean that the MCL should have been expressed as 5 ppt not 0.005 ppb and that the level and range values should have been converted from ppb to ppt. Restating the CCR data to comply with the cited regulation sections yields:

Level Detected: 2 ppt
Range of Detections: 0.0 – 5 ppt
MCL: 5 ppt

The only post-treatment TCP results in SDWIS3 are from the T/E port and all are ND. That sampling point is physically close to the effluent ports of the GAC vessels and the T/E results are INCONSISTENT with the GAC effluent port results for samples taken concurrently. E.g. on 7/8/2019 the average of the 3 lead GAC vessel effluent ports was 11.13 ppt and on 7/26/2019 the average was 12.33 ppt. On both of these dates, the concurrent T/E sample result was ND. Requests to DDW to explain how this is possible have been ignored.

The 2019 CCR TCP range high is not possible. There is no SDWIS3 T/E result at 5 ppt.

Because of the testing requirements in the CIM WTP Permit, each effluent port of each lead GAC vessel is a “compliance monitoring sampling point” and therefore, GAC effluent port results are to be included in the level calculations and range data in the CCR’s Primary Contaminant table. During 2019, the GAC effluent port results with detections in ppt were:

Date	GAC	Result	Action
3/6	6	6.2	
4/3	6	8.0	
7/8	1	6.6	None – violation of permit requirements
7/8	3	5.8	None – violation of permit requirements
7/8	5	21	None – violation of permit requirements
7/26	1	12	Swapped out
7/26	3	11	Swapped out
7/26	5	14	Swapped out
10/30	2	6.8	Swapped out
10/30	4	ND	Swapped out
10/30	6	ND	Swapped out

The above compliance monitoring sampling point results are required to be included in the CCR data. The 21 ppt result from GAC vessel 5 on 7/8/2019 is the high. The “Level Detected” is required to be calculated as the average of the location averages. There are a total of 7 locations: the T/E port and the 6 GAC vessel effluent ports. The average results in ppt for each of these locations is:

T/E	GAC1	GAC2	GAC3	GAC4	GAC5	GAC6
0	2.07	0.62	1.87	0.00	5.83	1.42

The average of these 7 locations is 1.69 ppt which would be ND. The 2019 CCR should have provided the following as the TCP Table 4 data:

Sample Date: 1/9/2019 – 12/27/2019
Level Detected: ND
Range of Detections: ND – 21 ppt
MCL: 5 ppt

Table 5 – Secondary Contaminants

Chloride is a secondary contaminant with a recommended MCL of 250 ppm. It is not treated for by CIM's WTP. It is tested for quarterly as part of the weekly/Wednesday Distribution System testing regimen. The January 9 (Facility A) and April 3, 2019 (Facility D) weekly/Wednesday Distribution System samples were the input for the first quarter (Work Order No: 19A0005) and second quarter (Work Order No: 19D0015) reports from ALS – Truesdail Laboratories. (As discussed above in the bacteria discussion, there were no third and fourth quarter results.) There are no SDWIS3 entries for chloride samples taken at any sampling points. The 2019 CCR provided the following information for chloride:

Sample Date: 1/2019 – 10/2019
Level Detected: 46.39
Range of Detections: 18.4 – 84.20

Because only one sample point is selected for the additional testing each quarter, and only the first and second quarters had results, there are ONLY 2 samples to report on in the 2019 CCR: Facility A on 1/9 and Facility D on 4/3. Those results were 142 and 143 ppm respectively. The Sample Dates repeat the inaccurate dates in other table entries. The 2019 CCR data is FABRICATED. The 2019 CCR should have listed the chloride secondary entry as:

Sample Date: 1/9/2019 – 4/3/2019
Level Detected: 142.5
Range of Detections: 142 – 143

Color is a secondary contaminant with an MCL of 15 units. It is not treated for by CIM's WTP. It was tested for weekly at one site as part of the weekly/Wednesday Distribution System testing regimen. Again, as noted above in the bacteria discussion, there is no data for August 14. Therefore, there are 51 Distribution System sample results for color. There are also 5 source well results in SDWIS3 from samples taken on 12/4/2019 all of which had a ND result. The 2019 CCR provided the following information for color:

Sample Date: 1/2019 – 10/2019
Level Detected: 0.25
Range of Detections: 0.0 – 1.0

This CCR data is FABRICATED. The 51 weekly/Wednesday Distribution System results included 5 results that were greater than 1.0, including a result of 9 units on March 9, 2019, from the Facility B sample. See the ALS – Truesdail Laboratories work order No. 19C0344 in the pdf file "2019 Distribution System Bacteriological Monitoring Summary.pdf". The color result values from that pdf file and the supplemental PRA response are summarized in the file "2019 Color and Turbidity.xlsx". The Sample Dates repeat the inaccurate dates in other table entries. The 2019 CCR should have listed the color secondary table entry as:

Sample Date: 1/9/2019 – 12/27/2019
Level Detected: 0.18
Range of Detections: ND – 9

Iron is a secondary contaminant with an MCL of 0.3 ppm. It is not treated for by CIM's WTP. It is tested for quarterly as part of the weekly/Wednesday Distribution System testing regimen.

The January 9 (Facility A) and April 3, 2019 (Facility D) weekly/Wednesday Distribution System samples were the input for the first quarter (Work Order No: 19A0005) and second quarter (Work Order No: 19D0015) reports from ALS – Truesdail Laboratories. (As discussed above in the bacteria discussion, there were no third and fourth quarter results.) There are no SDWIS3 iron entries for samples taken at any sampling points. The 2019 CCR provided the following information for iron:

Sample Date: 1/2019 – 10/2019
Level Detected: 0.03
Range of Detections: 0.00 – 0.18
MCL: 0.3 ppm

Title 22 § 64481 (d) (2) (A) states "For detected regulated contaminants referenced … the table(s) shall include … the MCL expressed as a number equal to or greater than 1.0".

Title 22 § 64481 (d) (2) (D) requires that "… sample result(s) collected at compliance monitoring sampling points shall be reported in the same units as the MCL…."

These 2 regulation citations mean that the MCL should have been expressed as 300 ppb not 0.3 ppm and that the level and range values should have been converted from ppm to ppb. Restating the CCR's result data to comply with the cited regulation sections yields:

Level Detected: 30
Range of Detections: 0.00 – 180
MCL: 300 ppb

Because only one sample point is selected for the additional testing each quarter, and only the first and second quarters had results, there are ONLY 2 samples to report on in the 2019 CCR: Facility A on 1/9 and Facility D on 4/3. Those results were 0.0106 and 0.0394 ppm respectively (10.6 and 39.4 ppb). Therefore, the 2019 CCR data is FABRICATED. The Sample Dates repeat the inaccurate dates in other table entries. The CCR should have listed the iron secondary entry as:

Sample Date: 1/9/2019 – 4/3/2019
Level Detected: 25.0
Range of Detections: 10.6 – 39.4
MCL: 300 ppb

Manganese is a secondary contaminant with an MCL of 0.05 ppm (50 ppb). It is not treated for by CIM's WTP. It is tested for quarterly as part of the weekly/Wednesday Distribution System testing regimen. The January 9 (Facility A) and April 3, 2019 (Facility D) weekly/Wednesday Distribution System samples were the input for the first quarter (Work Order No: 19A0005) and second quarter (Work Order No: 19D0015) reports from ALS – Truesdail Laboratories. (As discussed above in the bacteria discussion, there were no third and fourth quarter results.) There are no SDWIS3 manganese entries for samples taken at any sampling points**.** The 2019 CCR provided the following information for manganese in ppb:

Sample Date: 1/2019 – 10/2019
Level Detected: 1.94
Range of Detections: 0.0 – 23.3

Both of the referenced quarterly results were ND. The 2019 CCR table entry for manganese is a total FABRICATION. In order to compute a level detected of 1.94 where one value is 23.3, there must be a minimum of at least 11 more locations (making 12 in all) each with ND as a result. Manganese should not have been listed in the CCR secondary table.

Specific Conductance is a secondary constituent with a recommended MCL of 900 µS/cm. It is not treated for by CIM's WTP. It is tested for quarterly as part of the weekly/Wednesday Distribution System testing regimen. The January 9 (Facility A) and April 3, 2019 (Facility D) weekly/Wednesday Distribution System samples were the input for the first quarter (Work Order No: 19A0005) and second quarter (Work Order No: 19D0015) reports from ALS – Truesdail Laboratories. (As discussed above in the bacteria discussion, there were no third and fourth quarter results.) CIM chose to use the "upper range" MCL of 1600 µS/cm (instead of 900). The 2019 CCR provided the following information for specific conductance in µS/cm:

Sample Date: 1/2019 – 10/2019
Level Detected: 656.63
Range of Detections: 437 – 841
MCL: 1600

There are no SDWIS3 specific conductance entries for samples taken at any sampling points. Because only one sample point is selected for the additional testing each quarter, and only the first and second quarters had results, there are ONLY 2 samples to report on in the 2019 CCR: Facility A on 1/9 and Facility D on 4/3. Those results were 676 and 681 µS/cm respectively. Therefore, the 2019 CCR data is FABRICATED. The Sample Dates repeat the inaccurate dates in other table entries. The 2019 CCR should have listed the specific conductance secondary entry as:

Sample Date: 1/9/2019 – 4/3/2019
Level Detected: 678.5
Range of Detections: 676 – 681

Sulfate is a secondary contaminant with a recommended MCL of 250 ppm. It is not treated for by CIM's WTP. It is tested for quarterly as part of the weekly/Wednesday Distribution System testing regimen. The January 9 (Facility A) and April 3, 2019 (Facility D) weekly/Wednesday Distribution System samples were the input for the first quarter (Work Order No: 19A0005) and second quarter (Work Order No: 19D0015) reports from ALS – Truesdail Laboratories. (As discussed above in the bacteria discussion, there were no third and fourth quarter results.) There are 88 sample results in SDWIS3 from 6 separate sampling points – the WTP Raw (blended) input and 5 wells. The 2019 CCR provided the following information for sulfate:

Sample Date: 1/2019 – 10/2019
Level Detected: 67.96
Range of Detections: 29.4 – 106

There are 4 sulfate results in SDWIS3 that are lower than the 2019 CCR's low of 29.4. The quarterly samples (not in SDWIS3) were 16.6 (Facility A) and 14.2 (Facility D) making a total of 6 samples lower than the 2019 CCR low. There is no sample in SDWIS3 with a result of 29.4**.** There is no sample in SDWIS3 with a result of 106. The CCR entry for sulphate is a total

FABRICATION. See the file “2019 Sulfate.xlsx” for a summary of the 90 laboratory results. The CCR Sample Dates repeat the inaccurate dates in other table entries. The 2019 CCR secondary table entry for sulfate should have read:

Sample Date: 1/9/2019 – 12/30/2019
Level Detected: 55.15
Range of Detections: 12.0 – 102

Total Dissolved Solids is a secondary contaminant with a recommended MCL of 500 ppm. It is not treated for by CIM’s WTP. It is tested for quarterly as part of the weekly/Wednesday Distribution System testing regimen. The January 9 (Facility A) and April 3, 2019 (Facility D) weekly/Wednesday Distribution System samples were the input for the first quarter (Work Order No: 19A0005) and second quarter (Work Order No: 19D0015) reports from ALS – Truesdail Laboratories. (As discussed above in the bacteria discussion, there were no third and fourth quarter results.) The 2019 CCR provided the following information for total dissolved solids:

Sample Date: 1/2019 – 10/2019
Level Detected: 438.9
Range of Detections: 232 – 568
MCL: 1000

CIM chose to use the “upper range” MCL of 1000 ppm (instead of 500). There are no SDWIS3 total dissolved solids entries for samples taken at any sampling points. Because only one sample point is selected for the additional testing each quarter, and only the first and second quarters had results, there are ONLY 2 samples to report on in the CCR: Facility A on 1/9 and Facility D on 4/3. Those results were 389 and 413 ppm respectively. Therefore**,** the CCR data is FABRICATED. The Sample Dates repeat the inaccurate dates in other table entries. The 2019 CCR should have listed the total dissolved solids secondary table entry as:

Sample Date: 1/9/2019 – 4/3/2019
Level Detected: 401
Range of Detections: 389 – 413

Turbidity is a secondary constituent with an MCL of 5 units. It is not treated for by CIM’s WTP. It is tested for weekly at one site as part of the weekly/Wednesday Distribution System testing regimen. Again, as noted above in the bacteria discussion, there is no data for August 14. In addition, for the weeks of July 10, July 17, and August 7, 2019, Enthalpy Analytical failed to provide results for turbidity in its laboratory report. Therefore, there are only 49 weekly/Wednesday Distribution System sample results for turbidity. There are also 5 source well results in SDWIS3 from samples taken on 12/4/2019 all of which had non-zero results. The 2019 CCR provided the following information for turbidity:

Sample Date: 1/2019 – 10/2019
Level Detected: 0.3
Range of Detections: 0.0 – 2.2

This 2019 CCR Turbidity data is FABRICATED. The source well results included a result of 4.7 units from the well 11A sample as documented in SDWIS3. The 54 turbidity result values (49 + 5) are summarized in the file “2019 Color and Turbidity.xlsx”. The CCR’s Sample Dates repeat

the inaccurate dates in other table entries. The CCR should have listed the turbidity secondary table entry as:

Sample Date: 1/9/2019 – 12/27/2019
Level Detected: 0.86
Range of Detections: ND – 4.7

Zinc is a secondary contaminant with an MCL of 5 ppm. It is not treated for by CIM's WTP. It is tested for quarterly as part of the weekly/Wednesday Distribution System testing regimen. The January 9 (Facility A) and April 3, 2019 (Facility D) weekly/Wednesday Distribution System samples were the input for the first quarter (Work Order No: 19A0005) and second quarter (Work Order No: 19D0015) reports from ALS – Truesdail Laboratories. (As discussed above in the bacteria discussion, there were no third and fourth quarter results.) There are no SDWIS3 zinc entries for samples taken at any sampling points. The 2019 CCR provided the following information for zinc:

Sample Date: 1/2019 – 10/2019
Level Detected: 0.34
Range of Detections: 0.0 – 5.41

Because only one sample point is selected for the additional testing each quarter, and only the first and second quarters had results, there are ONLY 2 samples to report on in the 2019 CCR: Facility A on 1/9 and Facility D on 4/3. Those results were ND and 0.0714 ppm respectively. Therefore, **the** CCR Zinc data is FABRICATED. In order to compute a level detected of 0.34 where one value is 5.41, there must be a minimum of at least 15 more locations (making 16 in all) each with ND as a result. The Sample Dates repeat the inaccurate dates in other table entries. The 2019 CCR should have listed the zinc secondary table entry as:

Sample Date: 1/9/2019 – 4/3/2019
Level Detected: 0.0357
Range of Detections: ND – 0.0714

Required data that was Omitted from the 2019 CCR

CIM's 2019 CCR did not list **Chlorine** test results, violating the requirements in Title 22 § 64481 which requires, in (c) (1), reporting the Maximum Residual Disinfectant Levels per § 64533.5. In response to a PRA request, DDW provided a pdf titled "2019 Distribution System Bacteriological Monitoring Summary.pdf" which contained the chlorine test results for each week of 2019 except for January 2, March 20, 5 weeks in May, August 14 and October 30. A supplemental PRA request provided the data for January 2, all 5 weeks in May and October 30. The chlorine low was at Facility D on 1/9/2019. The high was at Facility B on 12/27/2019. The Running Annual Average Chlorine level for 2019 was 1.02 ppm and is documented in the report "2019 4th Quarterly Report for Disinfectant Residuals Compliance.pdf". The 2019 CCR should have provided this as the data for chlorine:

Sample Date: 1/9/2019 – 12/27/2019
Level Detected: 1.02 ppm
Range of Detections: 0.63 – 1.75

CIM's 2019 CCR did not list **Total Trihalomethanes (TTHMS)** in the Primary Contaminant Table. TTHMS are a Disinfection Byproduct that is required to be included in the CCR. There is no DLR for TTHMS. The MCL is 80 ppb. All 4 samples collected at the perimeter fence of each Facility on 4/3/2019 detected TTHMS with values from 2.11 to 2.81 ppb. The analysis was done ALS Global USA, Corp. (2 samples collected on 8/5/2019 were “not detected.”) The level detected for TTHMs is defined by Title 22 § 64481 (d) (2) (D) 2 B. The Primary Contaminant Table should have included this as the TTHMs entry:

Sample Date: 4/3/2019 – 8/5/2019
Level Detected: 2.81 ppb
Range of Detections: ND – 2.81

CIM's 2019 CCR did not list **“free” Copper** in the Secondary Contaminant Table. It was detected at 65.7 ppb in a sample collected at Facility B on 8/14/2019 at 9:50:00 AM and analyzed by Enthalpy Analytical, Inc. The 2019 CCR’s Secondary Contaminant Table should have included this as the Copper (free) entry:

Sample Date: 8/14/2019
Level Detected: 16.425 ppb
Range of Detections: ND – 65.7

Hexavalent Chromium became a Regulated Primary Contaminant on July 1, 2014, but was removed effective May 31, 2017 (ordered by the Sacramento County Superior Court; Case No.: 34-2014-80001850). Hexavalent Chromium remains on the list of chemicals known to the state to cause cancer where it has been listed since February 27, 1987. (See Title 27 § 27001 (b).) CIM tested for and detected Hexavalent Chromium at wells 01A (8.8 ppb), 03 (8.4 ppb), 15 (6.1 ppb), and 16 (8.0 ppb) on 7/3/2019. For comparison purposes, the average Hexavalent Chromium levels in Hinkley, CA (think Erin Brockovich) were recorded as 1.19 ppb. CIM failed to mention Hexavalent Chromium anywhere in the 2019 CCR despite the fact that well 01A tested at more than 7 times the Hinkley average level. Unregulated contaminants are one of the 4 categories that are required to be included in the CCR but the 2019 CCR did NOT have the REQUIRED Unregulated Contaminant table. All CCRs from 2012 through 2018 had a “Table 6 – Detection of Unregulated Contaminants.” The 2012 CCR Table 6 listed Hexavalent Chromium as one of its 2 entries at 8.1 ppb. The 2013 CCR Table 6 listed Hexavalent Chromium as one of its 5 entries at 1.9 ppb. The 2014 through 2016 CCRs listed Hexavalent Chromium in Table 4 – Primary Contaminants at 6.49 ppb. (2015 and 2016 repeated the 2014 test results.) There was no testing for Hexavalent Chromium in 2017 or 2018. (On April 17, 2024, the SWRCB approved the reinstatement of Hexavalent Chromium as a Primary Contaminant restoring its prior MCL and DLR. For the largest water systems with 10,000 or more service connections, compliance monitoring will begin in two years. Smaller systems will have 3 years to comply.) The missing Unregulated Contaminant table should have had this as the Hexavalent Chromium entry:

Sample Date: 7/3/2019
Level Detected: 7.825 ppb
Range of Detections: 6.1 – 8.4

H) Robert Stockwell did not comply with the Federal reporting requirement relating to Lead and Copper Rule (LCR) tap sample testing for 2019. There is a SWRCB/DDW reporting compliance form titled "Lead and Copper Tap Sample Results Reporting Form." (LCR form).

The 2019 LCR samples were collected on August 14, 2019. The 7 LCR laboratory reports were dated 8/21/2019. Mr. Stockwell signed the 2019 LCR form and both dated his signature and stated the Result Notification date as 1/7/**2019**. It is likely that he meant 1/7/2020.as **2020** is the date in the report pdf name.

Page 3 of the 2019 LCR form says:

"Notification of Results
As required by *40 Code of Federal Regulations Section 141.BS(d),* within 30 days of learning of the tap monitoring results, I notified the participants, by mailing or by another method approved by the State, of the lead sample results from their individual taps, provided an explanation of the health effects of lead, listed steps the consumer could take to reduce exposure to lead, provided contact information for the water utility, the maximum contaminant level goal for lead, action level for lead, and any definitions.

Notification was done on _____1/7/2019 ____ by Other (please specify below)
Email

SIGNATURE: **DATE:** 1/7/2019
NAME (Print): Robert Stockwell **TITLE**: Chief Plant Operator"

The referenced email notification(s) (assuming 1/7/**2020**) was 4 months and 17 days after the laboratory report date. Stockwell acknowledged that he was required to report the results within 30 days of receiving the results, and since he waited an additional 3 ½ months, he did not follow the Federal notification requirements. A PRA request (I016140-042824) for a copy of the emails has been responded to indicating that the email notification could not be located.

I) Based on comparisons of SDWIS3 data and Nitrate data from 36 of 53 weekly (Wednesday) Distribution System laboratory reports with the 2020 CCR, the following contaminants-constituents have incorrect range data (low, high or both) in the 2020 CCR (Again, one 2020 sample result shown for each):

	CCR Range	Unit	Sampled	Result	Location	Lab
Hardness	**170** – 400	ppm	07/13/20	41	WTP T/E	Enthalpy Analytical

The section above "**Sodium and Hardness Reporting Errors**" applies to the 2020 CCR.

Barium	60.80 – **140.00**	ppb	02/05/20		148	Well 15
	Enthalpy Analytical					
Chromium	**4.90** – 11.10	ppb	01/08/20	ND	Well 15	Enthalpy Analytical
Nitrate (as N)	1.30 – **4.80**	ppm	07/08/20	13	Facility D	Enthalpy Analytical
Selenium	1.48 – **10.00**	ppb	02/05/20	11.8	Well 15	Enthalpy Analytical
Aluminum	0.00 – **3.79**	ppb	02/05/20	2150	Well 11A	Enthalpy Analytical
Iron	0.00 – **690**	ppb	02/05/20	2940	Well 11A	Enthalpy Analytical
Manganese	0.00 – **0.02**	ppb	07/01/20	ND	Well 1A	Enthalpy Analytical
Specific cond.	**500** – 1000	uS/cm	02/05/20	457	Well 03	Enthalpy Analytical

Tot. Dissol Solids	290 – **560**	ppm	02/05/20	600	Well 15	Enthalpy Analytical
Turbidity	0.09 – **3.40**	units	9/2/2020	17	Well 11A	Enthalpy Analytical

There was no sodium testing of post treatment samples in 2020. The last post treatment sample tested was collected on April 3, 2019, at Facility D at 9:30 am and analyzed by Truesdail Laboratories. The 2020 CCR falsely reported sodium results which are partly based on 14 well sample**s** collected on January 8, February 5, and July 1, 2020. The actual well low was 28 ppm (not 26) and came from a Well 16 sample collected July 1, 2020. Based on SDWIS3 data, the level detected for those 14 samples was 34.92 (not 32.84). The 2020 CCR should have provided the following for Sodium:

Sample Date: 1/9/2019 – 4/3/2019
Level Detected: 103.5
Range of Detections: 102 – 105

The 2020 CCR does not list any Primary Table data for **Aluminum** test results. The CCR is required to provide information for "Contaminants subject to an MCL". See Title 22 § 64481. Content of the Consumer Confidence Report subsection (c) (1) and the reference to § 64431 (Maximum Contaminant Levels--Inorganic Chemicals). Aluminum is one of only 2 contaminants that is both a primary and secondary contaminant. (The other is Thiobencarb, a Synthetic Organic Chemical.) The Primary MCL for aluminum is 1 mg/L (1 ppm or 1000 ppb). The DLR is 0.05 mg/L (0.05 ppm or 50 ppb). The Secondary MCL is 0.2 mg/L (0.2 ppm or 200 ppb). There are 14 test results in SDWIS3, all from well samples. The February 5 result was 2150 ppb (more than twice the Primary MCL) and is both a Primary MCL Violation and a Secondary MCL violation. The entry in the secondary table did not have the required asterisk to flag the entry as a secondary MCL violation. The 2020 CCR did not provide a table with "Summary Information for Violation of a MCL, MRDL, AL, TT, or Monitoring and Reporting Requirement" which should have had an entry for each of the aluminum MCL violations. The February 5 aluminum sample was collected from Well 11A. The 2020 CCR was required to provide this Aluminum data in the Primary Table:

Sample Date: 1/15/2020 – 7/1/2020
Level Detected: 223.5 ppb
Range of Detections: ND – 2150*****

The 2020 CCR iron result error (documented above) was a secondary MCL violation**.** Iron's secondary MCL is 300 ppb. The result, 2940 ppb, as reported by Enthalpy Analytical, is in SDWIS3 for the sample collected on February 5 from Well 11A. The missing Summary Table was required to have an entry for iron.

The 2020 CCR **Turbidity** result error (documented above) was a secondary MCL violation**.** Turbidity's secondary MCL is 5 units. The result, 17 units, as reported by Enthalpy Analytical, is in SDWIS3 for the sample collected on September 2 from Well 11A. The missing Summary Table was required to have an entry for turbidity.

The 2020 CCR does not list any results for **Chlorine** testing. The CCR is required to provide information for "Maximum Residual Disinfectant Levels". See Title 22 § 64481. Content of the Consumer Confidence Report subsection (c) (1) and the reference to §64533.5. (Maximum Residual Disinfectant Levels). 47 laboratory reports and the 4th quarter Report for

Disinfectant Residuals Compliance provided the following Chlorine data. The Level Detected is the 2020 RAA. The minimum was from February 26 at Facility D. The maximum was from December 21 at Facility B. There was no chlorine data collected for Wednesday of January 1, January 8, April 15, June 10, July 1, and December 28, 2020. The 2020 CCR was required to provide this Chlorine data:

Sample Date: 1/15/2020 – 12/21/2020
Level Detected: 1.15 ppm
Range of Detections: 0.73 – 1.70

The 2020 CCR misreported **chloride** levels. Chloride is a secondary contaminant and is added to the water during the hardness treatment process. There were no 2020 post treatment chloride results. The last WTP/Reservoir sample tested for chloride was taken October 3, 2018. CIM stopped the Wednesday distribution system testing (quarterly) for chloride beginning in July 2019. Substituting lower well results for higher post treatment results is improper. The 2020 CCR should have listed the chloride secondary entry as:

Sample Date: 1/9/2019 – 4/3/2019
Level Detected: 142.5
Range of Detections: 142 – 143

CIM failed to report the following in the 2020 CCR:

TCE, a primary contaminant, was detected at 0.52 µg/L (ppb) at the WTP T/E. The sample was collected on May 6 and analyzed by Enthalpy Analytical. The result is documented in SDWIS3. TCE's DLR is 0.5 µg/L and its MCL is 5 ug/L. The 2020 CCR should have this as the Primary Table entry for TCE**:**

Sample Date: 3/11/2020 – 10/7/2020
Level Detected: ND
Range of Detections: ND – 0.52
Units: ppb

TCP, a primary contaminant, was detected at 9.9 ng/L (ppt) at the GAC vessel 6 Effluent port. The sample was collected on September 2 and analyzed by Enthalpy Analytical. The result is documented in the laboratory report with Lab Job # 433086. The TCP DLR is 5 ng/L and its MCL is also 5 ng/L. The 2020 CCR should have this as the Primary Table entry for TCP**:**

Sample Date: 1/10/2020 – 12/23/2020
Level Detected: ND
Range of Detections: ND – 9.9
Units: ppt

Sulfate, a secondary contaminant, was detected in 3 of 6 post treatment samples analyzed by Enthalpy Analytical and reported in SDWIS3. The high was from a sample collected on February 3 at the WTP's T/E port. The 2020 CCR should have this as the Secondary Table entry for Sulfate**:**

Sample Date: 2/3/2020 – 8/5/2020
Level Detected: 0.49
Range of Detections: ND – 0.968
Units: ppm

The 2020 CCR is available at:

https://ear.waterboards.ca.gov/Home/ViewCCR?PwsID=CA3610850&Year=2020&isCert=false

The **false certification by Stockwell** on July 4, 2021, that the 2020 CCR was "correct" is at:

https://ear.waterboards.ca.gov/Home/ViewCCR?PwsID=CA3610850&Year=2020&isCert=true

J) Based on comparisons of SDWIS3 data and the data from 51 of 52 weekly Wednesday distribution system reports with the 2021 CCR, the following contaminants-constituents have incorrect range data (low, high or both) in the 2021 CCR (Again, one 2021 sample result shown for each):

	CCR Range	Unit	Sampled	Result	Location	Lab
Hardness	**170** – 350	ppm	12/01/21	41	WTP T/E	E.S. Babcock & Sons

The section above "**Sodium and Hardness Reporting Errors**" applies to the 2021 CCR.

Barium	**63.00** – 130.00	ppb	03/24/21			ND Well 01A Enthalpy Analytical
Nitrate	2.80 – **4.20**	ppm	08/18/21	4.6	WTP T/E	E.S. Babcock & Sons
Selenium	**1.40** – 8.70	ppb	04/07/21	ND	Well 16	Enthalpy Analytical

Aluminum	0.00 – **0.25**	ppb	03/24/21	250	Well 11A	Enthalpy Analytical
Iron	0.00 – **59.00**	ppb	04/07/21	690	Well 11A	Enthalpy Analytical
Manganese	0.00 – **3.10**	ppb	03/24/21	ND*	Well 01A	Enthalpy Analytical

* All SDWIS3 results for all sample locations are ND

The 2021 CCR does not list any Primary Table data for **Aluminum** test results. (See the information above in the 2020 CCR discussion.) There are 17 test results in SDWIS3, all from well samples. The (primary) DLR for Aluminum is 50 ppb. The March 24 Well 11A result was 250 ppb and is both a primary "detection" and a **Secondary MCL violation**. The entry in the secondary table did not have the required asterisk to flag the entry as a secondary MCL violation. The 2021 CCR did not provide a table with "Summary Information for Violation of a MCL, MRDL, AL, TT, or Monitoring and Reporting Requirement" which should have had an entry for the aluminum secondary MCL violation. The 2021 CCR was required to provide this Aluminum data in the Primary Table:

Sample Date: 3/24/2021 – 10/6/2021
Level Detected: ND
Range of Detections: ND – 250
Units: ppb

The 2021 CCR misreported **chloride** levels. Chloride is a secondary contaminant and is added to the water during the hardness treatment process. There were no 2021 post treatment chloride results. The last WTP/Reservoir sample tested for chloride was taken October 3, 2018. CIM stopped the Wednesday distribution system testing (quarterly) for chloride beginning in July 2019. Substituting lower well results for higher post treatment results is improper. The 2021 CCR should have listed the chloride secondary entry as:

Sample Date: 1/9/2019 – 4/3/2019
Level Detected: 142.5
Range of Detections: 142 – 143

CIM failed to report the following in the 2021 CCR:

Chlorine. The CCR is required to provide information for "Maximum Residual Disinfectant Levels". See Title 22 § 64481. Content of the Consumer Confidence Report subsection (c) (1) and the reference to §64533.5. (Maximum Residual Disinfectant Levels). 49 laboratory reports and the 4th quarter Report for Disinfectant Residuals Compliance provided the following Chlorine data. The level is the 2021 RAA. The minimum was from August 18 at Facility A. The maximum was from October 20 at Facility B. There was no chlorine data collected for Wednesday March 3, June 2, and September 1, 2021. The 2021 CCR was required to provide this Chlorine data:

Sample Date: 1/6/2021 – 12/29/2021
Level Detected: 1.13 ppm
Range of Detections: 0.64 – 1.89

Perchlorate is a primary contaminate. The DLR for perchlorate was changed effective 7/1/2021 from 4 ppb to 2 ppb. The MCL was unchanged at 6 ppb. There are 8 source well sample results in SDWIS3 prior to the change – 4 on March 24 and 4 on April 7. All 8 are ND. There are 9 sample results post change – 4 on July 7 and 5 on October 6. Perchlorate was detected at Well 01A on both second half dates. These detected levels were 2.7 and 2.3 ppb. For Wells 11A, 15 and 16, the sample results were ND for both post change dates as was the single result for Well 03 (3A?) on October 6. The location average for the 5 locations is 0.417 ppb which is below DLR. The 2021 CCR should have this as the Primary Table entry for Perchlorate:

Sample Date: 3/24/2021 – 10/6/2021
Level Detected: ND
Range of Detections: ND – 2.7
Units: ppb

TCP, a primary contaminant, was detected at 0.0081 ug/L (ppb), which is 8.1 ng/L (ppt), at the GAC vessel 4 Effluent port. The sample was collected on August 5 and analyzed by Babcock Laboratories. The result is documented in the laboratory report with Work Order Number C1H1014. The TCP DLR is 5 ng/L and its MCL is also 5 ng/L. The 2021 CCR should have this as the Primary Table entry for TCP**:**

Sample Date: 1/6/2021 – 12/8/2021
Level Detected: ND
Range of Detections: ND – 8.1
Units: ppt

Total Trihalomethanes (TTHMs) is a primary contaminant. There are 2 SDWIS3 result entries for TTHMs – one each at Facility C and Facility D – both from August 5. The level detected for TTHMs is defined by Title 22 § 64481 (d) (2) (D) 2 B. The 2021 CCR should have this as the Primary Table entry for TTHMs:

Sample Date: 8/5/2021
Level Detected: 0.61 ppb
Range of Detections: ND – 0.61

Hexavalent Chromium (aka Chromium 6), an unregulated contaminant, was detected in all 8 source well samples collected in 2021. Samples were collected on March 24 and again 2 weeks later on April 7 at Wells 01A, 11A, 15 and 16. The low detection was at Well 11A on April 7. The high was at Well 16, also on April 7. (See the Hexavalent Chromium discussion in Section II - Paragraph 9 - The 2019 CCR's Accuracy.) The 2021 CCR failed to include an unregulated contaminant table. That missing unregulated table should have included this Hexavalent Chromium information:

Sample Date: 3/24/2021 – 4/7/2021
Level Detected: 6.69 ppb
Range of Detections: 3.5 – 8.3

The 2021 CCR is available at:

https://ear.waterboards.ca.gov/Home/ViewCCR?PwsID=CA3610850&Year=2021&isCert=false

The **false certification by Stockwell** on July 5, 2022, that the 2021 CCR was "correct" is at:

https://ear.waterboards.ca.gov/Home/ViewCCR?PwsID=CA3610850&Year=2021&isCert=true

K) Based on comparisons of SDWIS3 data with the 2022 CCR, the following contaminants-constituents have incorrect range data (low, high or both) in the 2022 CCR (Again, one 2022 sample result shown for each):

	CCR Range	Unit	Sampled	Result	Location	Lab
Hardness	**140** – 380	ppm	03/03/23	41	WTP T/E	E.S. Babcock & Sons

The section above "**Sodium and Hardness Reporting Errors**" applies to the 2022 CCR.

Barium	**63.00** – 130.00	ppb	07/06/22		ND	Well 01A
	E.S. Babcock & Sons					
Chromium	**6.20** – 9.20	ppb	07/06/22	ND	Well 01A	E.S. Babcock & Sons
Fluoride	**0.00** – 0.27	ppm	04/06/22	0.13	Well 01A	E.S. Babcock & Sons

Cadmium	0.00 – **0.13**	ppb	01/05/22	ND*	Well 01A	E.S. Babcock & Sons
Nitrate	**2.40** – 5.40	ppm	02/22/22	2.2	Reservoir	E.S. Babcock & Sons
Iron	0.00 – **59.00**	ppb	10/05/22	840	Well 11A	E.S. Babcock & Sons

* All SDWIS3 results for all sample locations are ND

The 2022 CCR misreported **chloride levels**. Chloride is a secondary contaminant and is added to the water during the hardness treatment process. There were no 2022 post treatment chloride results. The last WTP/Reservoir sample tested for chloride was taken October 3, 2018. CIM stopped the Wednesday distribution system testing (quarterly) for chloride beginning in July 2019. Substituting lower well results for higher post treatment results is improper. The 2022 CCR should have listed the chloride secondary entry as:

Sample Date: 1/9/2019 – 4/3/2019
Level Detected: 142.5
Range of Detections: 142 – 143

CIM failed to report the following in the 2022 CCR:

Chlorine. The CCR is required to provide information for "Maximum Residual Disinfectant Levels". See Title 22 § 64481. Content of the Consumer Confidence Report subsection (c) (1) and the reference to §64533.5. (Maximum Residual Disinfectant Levels). 50 laboratory reports and the 4th quarter Report for Disinfectant Residuals Compliance provided the following Chlorine data. The level is the 2022 RAA. The minimum was from October 19 at Facility A. The maximum was from March 9 at Facility C. There was no chlorine data collected for either Wednesday May 4 or May 18, 2022. Additionally, there was no chlorine data for Facility D on March 2. The 2022 CCR was required to provide this Chlorine data:

Sample Date: 1/4/2021 – 12/28/2022
Level Detected: 0.99 ppm
Range of Detections: 0.52 – 1.52

Copper, free (not LCR samples) was detected above DLR (50 ppb) once. The location listed in SDWIS3 is generic (DBPR Sample) and the correct/exact location is to be determined. (It will likely be either C or D yard's perimeter fence sample.) The 2022 CCR should have this as the Primary Table entry for Copper, (free)**:**

Sample Date: 1/5/2022 – 12/7/2022
Level Detected: ND
Range of Detections: ND – 130
Units: ppb

Perchlorate is a primary contaminate. There are 20 source well sample results in SDWIS3. Perchlorate was detected at 2 wells on July 6. Well 16's result was 2.0 ug/L (ppb) and Well 01A's result was 2.4 ug/L. The location average for the 5 locations is 0.22 ppb which is below DLR. The 2022 CCR should have this as the Primary Table entry for Perchlorate:

Sample Date: 1/5/2022 – 10/5/2022
Level Detected: ND
Range of Detections: ND – 2.4
Units: ppb

TCP, a primary contaminant, was detected at 0.014 ug/L (ppb), which is 14 ng/L (ppt), at the GAC vessel 5 Effluent port. The sample was collected on August 17 and analyzed by Babcock Laboratories. The result is documented in the laboratory report with Work Order Number C2H2502. The TCP DLR is 5 ng/L and its MCL is also 5 ng/L. (There were 7 TCP detections above the DLR/MCL at GAC vessel effluent ports during 2022.) The 2022 CCR should have this as the Primary Table entry for TCP**:**

Sample Date: 1/7/2022 – 12/21/2022
Level Detected: ND
Range of Detections: ND – 14
Units: ppt

Color, a secondary contaminant, was measured at each of 5 wells quarterly. It was also measured weekly at 1 of 4 distribution system locations as part of the weekly/Wednesday tests. (Facility D's results did not get entered into SDWIS3, likely because of an undefined station code.) E. S. Babcock & Sons used an RDL of 3 which likely masked some non-zero results. Historically, laboratories used by CIM, if they employed an RDL/RL, used 1. Recently, laboratories have migrated to color RDL/RLs of 3 or 5. There were 3 test results of 5 units, one at Well 11A on July 6 and two distribution system results: Facility A on June 15 and Facility D on September 21. The 2022 CCR should have this as the Secondary Table entry for Color:

Sample Date: 1/5/2022 – 12/28/2022
Level Detected: 0.23 units
Range of Detections: ND – 5

Additional Reporting Issues and Errors in the 2022 CCR

Aluminum is listed in the Secondary Table with an MCL of 0.2 mg/L (ppm). Title 22 § 64481 (d) (2) (A) requires MCLs to be a number equal to or greater than 1.0. That would require this contaminant to use ppb with a secondary MCL of 200. CCRs for the years 2012 through 2018, 2020 and 2021 used the correct MCL. (2019 did not report aluminum detections.) Converting the mg/L data in the CCR to ppb, the level would be 4.6 and the range would be 0.0 – 27.0. However, the 20 results in the SDWIS3 database are All ND, that is, below the primary DLR of 50 ppb. The laboratory reports are needed to confirm that the results, without interference from primary DLR constraints, have non-zero data.

Chloride results are from source well samples and are not valid for this contaminant due to the introduction of chloride as part of the Treatment Plant operations. Chloride was measured quarterly in the past (Wet Chemistry) using the weekly/Wednesday distribution system samples. See the discussion for Sodium & Hardness above. Post treatment levels for chloride have historically been greater than 100 ppm. The range in the CCR is 18.00 – 91.00 ppm.

Iron's range in the CCR is 0.00 – 59.00 ppb but with a level of 59.2. Note that the (average) level is greater than the high. On 10/5/2022 the result for the Well 11A sample was 840 ug/L (ppb). The secondary MCL for iron is 300 ppb. This Well 11A result is a secondary MCL violation. That 840 in the Secondary Table range should have an asterisk and there should be an entry in the (missing) Summary Table for Iron. The range and level values need to be verified using the laboratory reports because the laboratory used 3 different RLs during the year – 25, 50, and 100 ppb and the result values in the SDWIS database may have been obscured by the RL.

Manganese's range in the CCR is 0.00 – 12.00 ppb. The (average) level is 1.11. There was one non-zero entry in SDWIS – 12 ug/L on 10/5/2022 at Well 11A. The range and level values need to be verified using the laboratory reports because the laboratory used 3 different RLs during the year – 5, 10, and 20 ppb and the result values in the database may have been obscured by the RL. Strangely, the laboratory used an RL of 5 for the 10/5/2022 result for Well 11A but used 10 for the other 4 well samples from that date.

Sulfate's secondary table range is 29.00 – 110.00 mg/L with a level of 62.65. Sulfate levels are affected by the Anion Exchange process that reduces nitrate levels. Since at least the 2012 CCR, CIM has improperly reported sulfate by using pre-treatment (source well and/or the blended raw input) test results in the CCRs. There has been some post treatment testing in the past including quarterly (4 results per year) as a part of the weekly/Wednesday distribution system testing. These tests are no longer performed. There has been sporadic WTP T/E (total of 26) and Reservoir (total of 24) testing over the last decade. T/E samples per year are: 2015 6; 2016 5; 2017 4; 2018 1; 2020 5; 2021 5. There are no T/E test results in SDWIS for 2011 through 2014, 2019, and 2022. The range for the 26 historical T/E tests is ND – 29 mg/L with an average of 8.58. The samples taken at the reservoir are similar in number and results to the T/E results: 2015 7; 2016 8; 2017 5; 2018 3; 2020 1, with no reservoir samples in 2011 – 2014, 2019, 2021, and 2022. These 24 reservoir tests have a range of 0.667 – 24 with an average of 14.17.

Turbidity's secondary table range is 0.00 – 7.10 units with a level of 0.66 units. The 7.10 high is a secondary MCL violation. (The secondary MCL is 5 units.) This range high entry was not flagged with an asterisk and there is no Summary Table in the CCR to provide "additional information." There are 59 turbidity sample results in SDWIS for 8 separate locations. The SDWIS range is ND – 7.1. The average of the 8 locations is 0.46 units. All turbidity results from Facility D are missing from SDWIS3, 8 with non-zero values and 4 ND.

The laboratory processing the well samples for **Zinc**, E. S. Babcock & Sons, used 3 different RLs during the year: 10, 20, and 50 ug/L. The sole reported non-zero result, 15 ppb on 10/5/22, was the only sample that was reported using the RL of 10. All other results in the SDWIS database are potentially obscured by the RL. Curiously, the other 4 wells also measured on 10/5 used an RL of 20. Examination of the reports, instead of relying on the database, would be necessary to determine the correct secondary range and level results.

CIM failed to conduct required testing.

A) The results of the **2013** Lead and Copper Rule (LCR) testing required CIM and the SWRCB to take steps to address a lead Action Level exceedance. Title 22 § 64673 (c) lists those steps which included "(1) Monitor WQPs beginning with the first period after the exceedance…" as the first step toward the introduction of Corrosion Control. (WQP is the acronym for Water Quality Parameter.) Instead of doing so, CIM elected, contrary to regulation to change their testing frequency to triennial from annual. Title 22 § 64675.5. "Tap Sampling Frequency" only provides for a change to triennial under 2 circumstances, neither of which applied to CIM. Because of the unauthorized switch to triennial, CIM failed to conduct required LCR testing in 2014, 2015, 2017, and 2018. The steps required both CIM and the SWRCB to perform specific actions. A PRA to the SWRCB for documentation of these actions is still outstanding. Had those steps been taken, the results of the 2013 LCR testing would have also required CIM to revert to their 40-site "standard" list for subsequent testing instead of continuing to use the 20-site reduced list. This change was required by Title 22 § 64673 (c) (2). When CIM next conducted LCR testing in 2016, CIM failed to use the required 40-site list. Instead, the 20-site reduced list was used. In 2019, the SWRCB eventually required CIM to initiate the WQP steps, install corrosion control, and use the 40-site list – actions that should have been taken in 2014. This belated enforcement was prompted by multiple Action Level exceedances in 2016 which had been under reported by CIM originally, but eventually "corrected" after intervention by the US EPA.

B) In 2015, CIM did not test for the presence of Disinfectant Byproducts (DBP) as required by Title 22 § 64534.2. "Disinfection Byproducts Monitoring." A **"**Major" violation was issued by the SWRCB on November 1, 2018, for this failure. The DBP violation is referenced at this SWRCB site:

https://sdwis.waterboards.ca.gov/PDWW/JSP/Violations.jsp?tinwsys_is_number=3862&tinwsys_st_code=CA

C) In 2016, CIM did not test for the presence of Disinfectant Byproducts (DBP) as required by Title 22 § 64534.2. "Disinfection Byproducts Monitoring." A "Major" violation was also issued by the SWRCB on November 1, 2018, for this failure. This DBP violation is also referenced at the SWRCB site at the link provided above.

D) Title 22 § 64442 has the requirements for testing for Gross Alpha Particle Activity, Radium-226, Radium-228, and Uranium. The frequency of testing is dependent on prior results, including results from initial monitoring. § 64442 (b) (1) requires that CIM shall "conduct all monitoring at the same sample site(s) unless a change is approved by the State Board, based on a review of the system and its historical water quality data." If prior results were below the DLR, the system is to collect and analyze samples every 9 years per § 64442 (d) (4) (A). For prior results above DLR but below ½ the MCL, the frequency is every 6 years per § 64442 (d) (4) (B). When the prior result is above ½ the MCL, the frequency is every 3 years per § 64442 (d) (4) (C).

For Radium 226 and 228, the sum of the individual results is to be used to calculate a combined result level per § 64442 (d) (2). There was comprehensive monitoring with samples collected on July 10, 2007, and October 9, 2007. Samples were collected from 8 sampling points: 7 wells

(01, 01A, 3A, 11A, 14, 15, and 16) and the reservoir. The requirement for 4 quarterly samples was apparently waived by the SWRCB after 2 quarterly sample collections. As all results were below DLR, the next monitoring was to be prior to October 9, 2016, at each of the sampling sites. § 64442 (f) (1) allows the substitution of Gross Alpha results for the radium monitoring requirement. On 9/8/2015, CIM collected samples from 6 wells (01, 01A, 03, 11A, 15, and 16) and analyzed them for Gross Alpha. There were no Goss Alpha samples collected from the reservoir at any time, or Well 14 in 2015. (The last Well 14 sample which was tested for Gross Alpha was collected on August 2, 2005.) Well 14 was listed as a source well in the 2015 and 2016 CCRs and should have been included in the sample list. Because Well 14 and the reservoir were not included in the Gross Alpha monitoring and no radium testing as performed at either site, CIM failed to comply with the monitoring regulations with respect to radium. (CIM's permit lists Well 03 as a permitted potable source. There is also a well named 3A. CIM frequently labels samples collected at a well with 3 in its name as coming from 3A. It is unclear whether the samples tested for radium in 2007 and Gross Alpha in 2015 came from Well 03 (the permitted well) or Well 03A. Tests for radium 226 on June 6, 2000, included samples collected from sites with primary station codes of 3610850-003 and 3610850-011. The primary station code 3610850-003 is currently described as "WELL 03" and 3610850-011 is "WELL 03 - INACTIVE (DUP)". Which one is the real Well 3 and which is Well 3A is unknown.)

Gross Alpha testing is also allowed to be substituted for uranium testing per § 64442 (f) (1). The discussion above re the substitution of Gross Alpha testing for radium testing also applies to uranium. Because of this, CIM failed to comply with the monitoring regulations with respect to uranium because the reservoir and Well 14 were both excluded from the Gross Alpha/uranium testing. (The confusion as to whether the Well 3 samples came from the permitted Well 03 or from Well 3A also applies to the uranium test discussion.)