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**State Water Resources Control Board  
Division of Drinking Water**

December 7, 2021

Marie Woodin, Director  
Sacramento County Environmental Management Department  
10590 Armstrong Avenue, Suite A  
Sacramento, CA 95655

**Subject: Fiscal Year 2020-2021 Local Primacy Agency Annual Evaluation**

Dear Ms. Woodin:

The State Water Resources Control Board-Division of Drinking Water (Division) finds the Local Primacy Agency (LPA) - Sacramento County **is in compliance** with all requirements of the current Local Primacy Delegation Agreement (LPDA). In addition, the LPA has met the program activities approved in the fiscal year (FY) 2020-2021 workplan.

On October 29, 2021, the Division conducted an annual evaluation<sup>1</sup> of the LPA program for Sacramento County of FY 2020-2021. The Division representatives conducting the evaluation were Wendy Killou – Senior Environmental Scientist, Ali Rezvani – District Engineer, and Brendan O’Sullivan – Environmental Scientist and the LPA representatives were Megan Floyd – Environmental Specialist, Tim McPherson – Senior Accounting Manager, and Ross McCarthy – Accounting Manager. The purpose of the evaluation was to determine the LPA program’s compliance status with respect to the activities set forth in the LPA workplan for FY 2020-2021, LPA Delegation Agreement and California Code of Regulations (CCR) Title 22, sections 64253 through 64260.

The findings of this evaluation are detailed in Attachments A and B. Upon completion of the evaluation, Division representatives find the items listed below are required to be addressed or considered by Sacramento County LPA program. Please submit a written response demonstrating willingness to comply with the items below by **December 21, 2021**.

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<sup>1</sup> California Health & Safety (HSC), section 116330(d) requires the Board to evaluate the drinking water program of each local primacy agency at least annually.

**DIRECTIVES**

1. By **February 1, 2022**, the LPA must update and maintain all required legal entity elements in the Division's SDWIS database. The information shall include a minimum of an administrative contact for each water system in the LPA's inventory. (LPDA 2.05 (b))
2. Beginning **February 1, 2022**, the LPA must submit to the Division, in PDF format, a copy of each citation and compliance order issued by the LPA. Guidance regarding how to submit enforcement actions may be found on the Division's FTP website. (LPDA-section 2.05 (c))

**RECOMMENDATIONS**

1. The Division highly recommends the LPA develop, and follow, a plan to use the 2013 grant funding by the end of June 30, 2024.
2. The Division recommends the LPA to check the Division's Water Quality Inquiry Database (WQI) or modified Drinking Water (mDWW) to ensure that a laboratory has submitted all water systems required chemical and radiological water quality data at a specified frequency. If a laboratory fails to submit the chemical and radiological water quality results, it is the responsibility of the water system to ensure that all required chemical and radiological water quality data are submitted to WQI in a timely matter as stated in CCR Title 22, section 64469 (c).

The Division would like to acknowledge the following accomplishments Sacramento County did above the minimum requirements of the LPA Delegation Agreement and workplan during the FY:

1. The LPA assisted their regulated water systems with completing the Source Locational Data Project.
2. The LPA assisted their regulated water systems with completing the Electronic Annual Report to the Division and achieved high reporting compliance.
3. The LPA was able to complete the majority of the activities and reporting requirements listed in the FY 2020-2021 workplan during the extenuating circumstances of the COVID-19 pandemic, which resulted in an increase of local activities outside of the LPA program.
4. The LPA staff, Megan Floyd, has been very active with water use groups, sitting on the CCDH Water Use Committee and the Water Well TAC.
5. Sacramento County LPA staff work collaboratively with State and local partners, small public water system operators, and owners to ensure compliance by promoting and maintaining communication that protects and enhances public health.

The Division looks forward to our continued partnership in the oversight of small public water systems in Sacramento County.

If you have any questions regarding this letter, please contact Wendy Killou – Program Liaison Unit at 916-449-5158.

Sincerely,

Wendy Killou  
Senior Environmental Scientist (Supervisor)  
Program Liaison Unit

Cc: Sacramento County Board of Supervisors, via email at  
[boardclerk@sacounty.net](mailto:boardclerk@sacounty.net)

Ali Rezvani, P.E., Sacramento District Engineer, via email at  
[Ali.Rezvani@Waterboards.ca.gov](mailto:Ali.Rezvani@Waterboards.ca.gov)

Attachment A - Local Primacy Agency Annual Evaluation Form

Attachment B – Summary of Data Reporting to the SWRCB - Division of Drinking Water

County: SACRAMENTO  
 Conducted By: Brendan O'Sullivan  
 Date: 10/29/2021

Compliance Level to Address	Timeline Guidance
High	30-60 days
Medium	60-90 days
Low	90-180 days

Permitting (LPDA 2.01) <sup>1</sup>	Y	N	N/A	Directive	Recommendation	Based on File Review
A. Did the LPA meet the workplan goal for permit activities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
B. TMF assessments for new and change of ownership water supply permits that were issued?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>
C. Does the LPA receive, review and issue water supply permits applicable per HSC and CCR Title 22 sections?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>
i. Preliminary technical report for proposed new PWS submitted	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>
ii. Applications submitted by PWS	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>
iii. DE has reviewed and concurred with the issuance of each permit for a proposed new PWS	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>
iv. CEQA completed for new sources, storage, and treatment	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>
v. Tech report or detailed sanitary survey included	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>
vi. Design & specs included	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>
vii. Well completion report for new sources	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>
viii. 50' well site control zone source identified ( <i>New Sources</i> )	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>
D. Does the LPA reference the permit guide?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	
E. Does the LPA track water supply permits that are accessible to all applicable staff?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	
F. Did the LPA receive any petitions for reconsideration (i.e. appeals) from public water system?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>			<input type="checkbox"/>
G. If yes, did the LPA report the petition to the DDW within 5 days?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		

<sup>1</sup> Refer to Attachment B-Table 1  
 8/4/2020-wkk

H. Does the LPA include the appeal language in all cover letters for water supply permits issued?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
<b>Annual Workplan (LPDA 2.02)</b>	<b>Y</b>	<b>N</b>	<b>N/A</b>	<b>Directive</b>	<b>Recommendation</b>	<b>Based on File Review</b>
A. Did the LPA submit a completed workplan for approval by the established or extended deadline? <b>08/09/2021</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
<b>Sanitary Surveys (LPDA 2.03)<sup>2</sup></b>	<b>Y</b>	<b>N</b>	<b>N/A</b>	<b>Directive</b>	<b>Recommendation</b>	<b>Based on File Review</b>
A. Did the LPA meet the workplan goal of sanitary surveys to be completed?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
B. Does the LPA conduct a file review prior to each sanitary survey?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	
C. Does each sanitary survey include the required eight (8) elements and for CWS only the resiliency and preparedness element?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>
D. Does the LPA provide written notice to the water system identifying the deficiencies found during the sanitary survey and outline a corrective action plan within 60 days of the sanitary survey?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>
E. Does the LPA provide the water systems with a complete sanitary survey report within 90 days of the sanitary survey?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>
F. If <u>significant</u> deficiencies were not corrected in a timely manner, did the LPA issue an enforcement action to the water system?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>
<b>Sampling and Monitoring (LPDA 2.04)</b>	<b>Y</b>	<b>N</b>	<b>N/A</b>	<b>Directive</b>	<b>Recommendation</b>	<b>Based on File Review</b>
A. Does the LPA provide the water quality monitoring and reporting requirements to their water systems in writing?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>
B. Does the LPA confirm that the water quality results were successfully submitted to the State's water quality (WQM) database and is water quality data reviewed at a minimum of monthly (except for TCR/rTCR)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		<input checked="" type="checkbox"/>	

<sup>2</sup> Refer to Attachment B-Table 2  
8/4/2020-wkk

C. Does the LPA receive, review, and track monthly SWTR reports?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>
D. For groundwater treated systems, including mandatory disinfection, does the LPA receive, review and track compliance of monthly operation reports?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>
E. Does each public water system have a current (<10 yrs.) and complete Bacteriological Sample Siting Plan (BSSP) on file?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>
F. Does the BSSP comply with the Ground Water Rule?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>
G. Is the LPA reviewing and monitoring CCR submissions by CWS and NTNC water systems?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>
H. Is the LPA monitoring submission of the CCR verification forms?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>
I. Has the LPA issued any water quality monitoring waivers, exemptions, or variances that differ from what is allowed in the CCR-Title 22 during applicable the fiscal year? (i.e. Sec. 64445(d))	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>
J. Does the applicable LPA staff have a mDWW account and refer to it?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	
K. In the event of failed monitoring, or not reporting water quality sampling, did the LPA issue appropriate enforcement (i.e., NOVs and citations) to water system(s) (i.e., nitrate, arsenic, DBP, radiological, etc.)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
<b>Data Management and Reporting (LPDA 2.05)<sup>3</sup></b>	<b>Y</b>	<b>N</b>	<b>N/A</b>	<b>Directive</b>	<b>Recommendation</b>	<b>Based on File Review</b>
A. Is the LPA using SDWIS to maintain and report all required data elements (i-viii)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>				
i. Water System Inventory	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
ii. Water System Contact Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>		
iii. Violations	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
iv. Enforcement Actions	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
v. Lead and Copper Rule	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
vi. Sanitary Surveys	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		

<sup>3</sup> Refer to Attachment B-Tables 2-6  
8/4/2020-wkk

vii. <i>Permits Issued (no current intake system)</i>			<input checked="" type="checkbox"/>			
viii. Source Class Codes	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
ix. Facility Lat/Long Coordinates	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
B. Did the LPA address errors identified in the SDWIS clean-up reports posted on WQI and mDWW?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
C. Is the LPA reporting data into SDWIS on or before 30 days after the last day of quarter?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
D. Does the LPA submit a PDF formatted copy of each citation or compliance order to the Board's IT Department for posting on the Board's website?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>		
E. Does the LPA comply with the Board's guidance regarding issuance of unsafe water notifications (4/2020)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>Additional Reporting Requirements (LPDA 2.06)<sup>4</sup></b>	<b>Y</b>	<b>N</b>	<b>N/A</b>	<b>Directive</b>	<b>Recommendation</b>	<b>Based on File Review</b>
A. Did the LPA meet the task deadlines for the Electronic Annual Report (EAR)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>				
i. Written notice to water system	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>
ii. Review and accept EARs	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
iii. Issue reminders to delinquent water systems	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
iv. Issue enforcement against delinquent water systems	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
B. Is the LPA reporting rTCR Level 1/2 Assessment activities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
<b>Enforcement (LPDA 2.07)<sup>5</sup></b>	<b>Y</b>	<b>N</b>	<b>N/A</b>	<b>Directive</b>	<b>Recommendation</b>	<b>Based on File Review</b>
A. Does the LPA issue enforcement actions that meet the formal action criteria?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>
B. Is the LPA using the template website for issuing enforcement actions?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
C. Is the LPA following up with directives listed in the enforcement actions?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
D. Does the LPA track the receipt of public notifications issued by the water systems?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

<sup>4</sup> Refer to Attachment B-Tables 7-8

<sup>5</sup> Refer to Attachment B-Tables 5

E. Did the LPA issue administrative or civil penalties to a water system when necessary to achieve compliance?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	
F. Are enforcement actions issued in a timely manner?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>
G. Does the LPA include the appeal language in all cover letters for enforcement actions issued?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			<input type="checkbox"/>
H. Did the LPA receive any pleadings initiating a civil or criminal action that the County has filed or referred for filing against a public water system?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
I. If yes, did the LPA report to the DDW within 30 days of the date of the filing of the pleading or the date of receipt by the County of the pleading.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
J. Did the LPA receive any petitions for reconsideration (i.e. appeals) from public water system?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
K. If yes, did the LPA report the petition to the DDW within 5 days?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
<b>Program Management (LPDA 3.01-3.09)<sup>6</sup></b>	<b>Y</b>	<b>N</b>	<b>N/A</b>	<b>Directive</b>	<b>Recommendation</b>	<b>Based on File Review</b>
A. Based on the level of adequate staff stated in the workplan, was the LPA able to maintain an adequate staffing level during the fiscal year?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
B. Does the LPA have a time accounting system in place as required in CCR section 64259 (b)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
C. Does the LPA have a file management system that meets CCR section 64259 (b)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>
D. Does the LPA refer to the Division's FTP site for information and guidance documents relating to SDWIS and Program requirements?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	
<b>Other Items</b>	<b>Y</b>	<b>N</b>	<b>N/A</b>	<b>Directive</b>	<b>Recommendation</b>	<b>Based on File Review</b>
A. Has the LPA addressed all past fiscal year evaluations directives?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
B. Does the LPA attend the DDW trainings and/or read the monthly news?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	

<sup>6</sup> Refer to Attachment B-Tables 9-10  
8/4/2020-wkk



C. Does the LPA have any 2013 grant funding available?  
If yes, amount: **\$63,805.05**



# Attachment B – Summary of Data Reporting to the SWRCB - Division of Drinking Water

**Table 1: Summary of Permit Issuance**

Type of Permit Issued	Number of Permits Issued Listed in Workplan	Number of Permits Issued <u>Not</u> Listed in Workplan	Number of Pending Permits Listed in Workplan	Workplan Goal Number
New Permit (Unpermitted, SB1263, or Change of Ownership)	0	0	0	0
Amended Permit (Treatment or Other)	1	0	0	1
Full or Amended Permit* 10-Year Review	6	0	0	6
<b>TOTAL NUMBER PERMITS ISSUED</b>	<b>7</b>	<b>0</b>		

\*if necessary

<b>NUMBER OF PUBLIC WATER SYSTEMS CURRENTLY <u>WITHOUT</u> A WATER SUPPLY PERMIT</b>	<b>5</b>
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## Attachment B – Summary of Data Reporting to the SWRCB - Division of Drinking Water

**Table 2: Summary of Sanitary Surveys Conducted**

Type of Water System	Number of Sanitary Surveys Conducted Listed in Workplan	Number of Sanitary Surveys Conducted <u>Not</u> Listed in Workplan	Workplan Goal Number
<b>Community Water System</b>	9	3	10
<b>Non-community Water System</b>	17	13	18
<b>TOTAL NUMBER SANITARY SURVEYS ISSUED</b>	<b>26</b>	<b>16</b>	28

1-Sanitary survey required frequency is every 3 years  
 2-Sanitary survey required frequency is every 5 years

# Attachment B – Summary of Data Reporting to the SWRCB - Division of Drinking Water

**Table 3: Summary of Water System Inventory**

Water System Source Type	Community Water Systems	Non-Transient Non-Community Water Systems	Transient Non-Community Water Systems
Groundwater (Untreated/Treated)	31	30	72
Groundwater-Purchased	1	0	0
Surface Water (includes Groundwater Under Direct Influence of Surface Water)	0	0	0
Surface Water-Purchased	0	2	0
<b>TOTAL</b>	<b>32</b>	<b>32</b>	<b>72</b>

Water System Type	Number of Water Systems
State Small *	6

\* For Informational Use Only, Not Evaluated

## Attachment B – Summary of Data Reporting to the SWRCB - Division of Drinking Water

**Table 4: Summary of Violations**

<b>Violation Category Type</b>	<b>Number of Violations</b>
<b>Monitoring (MON)</b>	2
<b>Reporting (RPT)</b>	0
<b>Maximum Contaminate Level (MCL)</b>	1
<b>Treatment Technique (TT)</b>	0
<b>Public Notification (PN)</b>	0
<b>Variance/Exemption (V/E)</b>	0
<b>Sanitary Survey (SS)</b>	0
<b>Other</b>	0
<b>TOTAL NUMBER OF VIOLATIONS</b>	<b>3</b>

<b>TOTAL NUMBER OF VIOLATIONS THAT NEED AN ENFORCEMENT ACTION ISSUED?</b>	<b>3</b>
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## Attachment B – Summary of Data Reporting to the SWRCB - Division of Drinking Water

**Table 5: Summary of Enforcement Actions Issued**

<b>Enforcement Action Type</b>	<b>Number of Enforcement Actions Issued</b>
<b>Formal Enforcement Actions (Compliance Order and Citations)</b>	<b>1</b>
<b>Informal Enforcement Actions (Notice of Violation or Enforcement Letter)</b>	<b>0</b>
<b>Other Enforcement Actions</b>	<b>0</b>
<b>Return to Compliance Actions</b>	<b>3</b>
<b>Formal/Informal Enforcement Actions (For State Violations Only)</b>	<b>0</b>
<b>TOTAL NUMBER OF ENFORCEMENT ACTIONS ISSUED</b>	<b>4</b>

## Attachment B – Summary of Data Reporting to the SWRCB - Division of Drinking Water

**Table 6: Lead and Copper (LCR) 90% Percentile Sampling Water System Summary**

Sampling Period	Total Number of Water Systems
3Q2020 (7/1-9/30)	9
4Q2020 (10/1-12/31)	0
1Q2021 (1/1-3/31)	0
2Q2021 (4/1-6/30)	0

**Table 7: rTCR ASSESSMENTS**

	Level 1 Assessment	Level 2 Assessment
<b>TOTAL NUMBER OF RTCR ASSESSMENTS CONDUCTED</b>	<b>2</b>	<b>2</b>

## Attachment B – Summary of Data Reporting to the SWRCB - Division of Drinking Water

**Table 8: Summary of Electronic Annual Report Submission & Acceptance**

Water System Type	Not Started (%)	Needs Revision (%)	In Process (%)	Submitted (%)	Completed (%)
Community Water System	0%	0%	0%	0%	100%
Non-community Non-transient Water System	0%	0%	9%	0%	91%
Transient Non-community Water System	32%	0%	4%	0%	64%
					79%

**Table 9: Fiscal Year Staff Time Allocation to LPA Program**

Position Title	Time allocated to program (direct cost hours only*)
Environmental Health Specialist IV	350
Environmental Health Specialist III	950
Environmental Health Technician	100
<b>TOTAL HOURS</b>	1400

\*Direct cost hours=time spent on core activities listed in the LPDA (i.e. sanitary surveys, inspections, permitting, compliance, enforcement activities, and reporting activities). Does not include vacation, sick leave, holiday hours.



# Attachment B – Summary of Data Reporting to the SWRCB - Division of Drinking Water

**Table 10: LPA Water System Annual Operating Permit Fees**

<b>Fee Description</b>	<b>Current Fee</b>
<b>Community Water Systems</b>	<b>\$1,545-\$3,743</b>
<b>Non-Transient Non-Community Water Systems</b>	<b>\$1,382-\$3,393</b>
<b>Transient Non-Community Water Systems</b>	<b>\$1,029-\$1,909</b>
<b>Enforcement (Hourly Rate)</b>	<b>\$213</b>