

State Water Resources Control Board

Division of Drinking Water

November 4, 2020

PWS# 3210011

Plumas Eureka CSD
200 Lundy Lane
Blairdsen, CA 96103

Attention: John Rowden, General Manager

Subject: Iron and Manganese Secondary MCL Waiver Approval

During the Sanitary Survey conducted on September 25, 2019, by Division of Drinking Water (DDW) Staff, it was noted that Plumas Eureka CSD (CSD) provides water which exceeds the iron and manganese secondary maximum contaminant levels (MCL) of 300-µg/L and 50-µg/L, respectively. The following table shows the running annual average (RAA) results for the past five years:

Year	Well 1B		Well 2	
	Iron RAA (µg/L)	Manganese RAA (µg/L)	Iron RAA (µg/L)	Manganese RAA (µg/L)
2020	453	95	440	89
2019	393	99	825	104
2018	428	98	553	104
2017	483	95	255	89
2016	438	102	653	119

California Code of Regulations, Article 16, §64449.2 provides a process by which the CSD could be granted a waiver from complying with the secondary MCLs for iron and manganese. To be eligible to apply for such a waiver, the average of four consecutive quarters of iron and manganese sample results cannot be greater than three times the secondary MCL, or greater than the State Notification Level. Based on the results above, the CSD is eligible to apply for such a waiver for both wells.

On September 18, 2020, the CSD formally submitted a secondary MCL waiver request and a Customer Acceptance Study, which included a complaint log, engineering report, customer survey, and public hearing report, all in accordance with the requirements of §64449.2(b).

Farr West Engineering prepared a report for the CSD on March 2, 2020, that used applicable data and information from previously conducted reports on the feasibility of installing arsenic treatment at each of the CSD wells, including a system rate study. As part of the *Arsenic Mitigation Feasibility Study* from June 2017 that Farr West completed, options considered in project alternatives included some which would also remove iron and manganese. The preferred alternative design was then expanded in the June 2018 document entitled *PECSD WTP- Final Technical Design Report* which included construction drawings along with construction and

operation and maintenance cost estimates. Using the estimates from the design report in April 2018 Farr West completed a rate study. The 2018 rate study was subsequently updated in March 2020 to reflect the removal of only iron and manganese and increases in construction costs from 2018. Customers were sent the engineering report and information on the potential increased monthly cost as part of the customer survey completed September 2020.

DDW approved a customer survey for distribution in February 2020; the survey questions satisfied the four required queries listed in §64449.2(b) through (f). All 592 billed customers were sent a survey along with the engineering report in August 2020. The CSD received a response rate of 77.8%, above the 50% required in §64449.2(d), and a majority of customers, 60.3%, preferred no treatment of any form and to accept the current water quality. Furthermore, §64449.2(e) states that treatment be the required course of action should the combined number of billed customers with no response and of those respondents who prefer treatment exceeds 50%; the combined no response rate and treatment preference rate was 39.7%.

The regularly scheduled CSD Board meeting held September 9, 2020, included presentation of the engineering report and tabulated customer survey results. This was followed by time allotted for public comment at which two members of the public voiced preference for pursuing treatment at this time due to increased future construction costs, and the possibility of regulations becoming more stringent. At this meeting, the CSD Board voted to apply for the waiver from the secondary MCLs. A copy of the advertised board meeting agenda and minutes were submitted.

Based on the CSD's submitted waiver request and Customer Acceptance Study, a nine-year waiver from the secondary MCLs for iron and manganese has been granted for Well 1B and Well 2. This waiver issuance date is October 1, 2020 and will apply until September 30, 2029. Quarterly monitoring for iron and manganese will continue to be required from both sources. Please note that the waiver only applies to the existing Well 1B and Well 2, and should a new well be developed within the time span of the waiver, the waiver will not be applied to the new well.

To apply for renewal of a waiver for a subsequent nine years, the system shall request approval from DDW at least six months prior to the end of the current waiver period. The renewal request shall include all monitoring and treatment operations data related to iron and manganese, and any related customer complaints submitted to the water system. Based on our review of the data and customer complaints, we may require the water system to conduct another customer survey pursuant to section 64449.2 before making a determination on the waiver renewal.

If you have any questions, please contact Nick McGann at (530) 224-3269 or by email at nick.mcgann@waterboards.ca.gov, or me at (530) 224-4800.



Stephen W. Watson, P.E.
Lassen District Engineer
Drinking Water Field Operations Branch

cc: Plumas County Environmental Health Department

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