
State Water Resources Control Board

Division of Drinking Water

December 27, 2024

Megan Floyd, Environmental Specialist Supervisor
Sacramento County Environmental Management Department
11080 White Rock Road Suite 200
Rancho Cordova, CA 95670

Subject: Fiscal Year 2023-2024 Local Primacy Agency Annual Evaluation

Dear Ms. Floyd:

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 that were approved in the fiscal year (FY) 2023-2024 workplan.

On November 21, 2024, the Division conducted an annual evaluation¹ of the LPA program for Sacramento County for FY 2023-2024. The Division representatives conducting the evaluation were Brendan O'Sullivan – Environmental Scientist, Austin Peterson – Sacramento District Engineer, and Michael Tolin – Water Resources Control Engineer and the LPA representatives were Megan Floyd – Environmental Specialist Supervisor, Jenny Choi – EH Specialist, Jennea Monasterio – Director of Environmental Management, Robert Duncan – Division Chief, and Jim Van Buren – Section Chief. The purpose of the evaluation is to determine the LPA program's compliance status with respect to the activities set forth in the LPA workplan for FY 2023-2024, 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 that 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 **January 31, 2025**.

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

RECOMMENDATIONS

1. The Division recognizes that the LPA has been making successful permit progress and recommends that the LPA should continue to strive towards meeting Workplan goals for issuing water supply permits, continuing to prioritize issuing full water supply permits to systems operating without a full water system permit or systems with outstanding unaddressed MCL issues. (HSC section 116525 and LPDA section 2.01)
2. The Division recommends that LPA should seek to expand staffing support for the program to ensure adequate level of staffing is maintained during the next fiscal year to support the program and to continue to high quality work the program has accomplished thus far. (LPDA, section 3.02)

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

1. The LPA closely assisted their regulated water systems with completing the Electronic Annual Report to the Division and achieved more than 90% reporting compliance.
2. The LPA was able to complete 100% of their planned sanitary surveys.
3. The LPA has provided significant direct assistance to the water systems in their inventory for electronic reporting (e.g., eAR, CCR, etc.).
4. 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 me at (559) 447-3307 or chad.fischer@waterboards.ca.gov.

Sincerely,



Chad Fischer
Supervising Water Resources Control Engineer
SAFER Drinking Water Section

Cc: Sacramento County Board of Supervisors, via email at
boardclerk@sacounty.net

Austin Peterson, P.E., Sacramento District Engineer
austin.peterson@waterboards.ca.gov

Attachment A - Local Primacy Agency Annual Evaluation Form
Attachment B - Summary of Data Reporting to the SWRCB - Division of Drinking Water
Attachment C – File Review Forms

Attachment A-Evaluation Checklist

County: Sacramento

Conducted By: Brendan O'Sullivan

Date: November 21, 2024

LPA/DE Staff in Attendance		
☒ Megan Floyd	☐ Nancy Lee	☒ Austin Peterson
☒ Jenny Choi	☒ Jim Van Buren	☐
☐	☒ Robert Duncan	☐
☐	☐	☐

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

Permitting (LPDA 2.01) ¹	Y	N	N/A	Directive	Recommendation	Based on File Review
A. Did the LPA meet the workplan goal for permit activities?	☐	☒	☐	☐	☒	
B. Does the LPA require TMF assessments for new and change of ownership water supply permits?	☒	☐	☐	☐		☐
C. LPA receives, reviews and issues water supply permits applicable per HSC and CCR Title 22 sections listed below?	☒	☐				
i. Preliminary technical report for proposed new PWS submitted	☒	☐	☐	☐		☐
ii. Applications submitted by PWS	☒	☐	☐	☐		☐
iii. DE has reviewed and concurred with the issuance of each permit for a proposed new PWS	☒	☐	☐	☐		☐
iv. CEQA completed for new sources, storage, and treatment	☒	☐	☐	☐		☐
v. Detailed sanitary survey or Tech Report included	☒	☐	☐	☐		☐
vi. Design & specs included	☒	☐	☐	☐		☐
vii. Well completion report for new sources	☒	☐	☐	☐		☐

¹ Refer to Attachment B-Table 1

Last Updated: 9/3/2024

Attachment A-Evaluation Checklist

viii. 50' well site control zone source identified (<i>New Sources</i>)	☒	☐	☐	☐		☐
D. Does the LPA reference the permit guide?	☒	☐	☐		☐	
E. Does the LPA track water supply permits that are accessible to all applicable staff?	☒	☐	☐		☐	
F. Did the LPA receive any petitions for reconsideration (i.e. appeals) from public water system?	☐	☒	☐			☐
G. If yes, did the LPA report the petition to the DDW within 5 days?	☐	☐	☒	☐		
H. Does the LPA include the appeal language in all cover letters for full water supply permits issued (applies only to new permits)?	☒	☐	☐	☐		
Annual Workplan (LPDA 2.02)	Y	N	N/A	Directive	Recommendation	Based on File Review
A. Did the LPA submit a completed workplan for approval by the established or extended deadline? 7/24/2023	☒	☐	☐	☐		
Sanitary Surveys (LPDA 2.03)²	Y	N	N/A	Directive	Recommendation	Based on File Review
A. Did the LPA meet the workplan goal of sanitary surveys to be completed?	☒	☐	☐	☐	☐	
B. Does the LPA conduct a file review prior to each sanitary survey?	☒	☐	☐		☐	
C. Does each sanitary survey include the required eight (8) elements and for CWS only the resiliency and preparedness element?	☒	☐	☐	☐		☐
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?	☒	☐	☐	☐		☐
E. Does the LPA provide the water systems with a complete sanitary	☒	☐	☐	☐		☐

² Refer to Attachment B-Table 2
Last Updated: 9/3/2024

Attachment A-Evaluation Checklist

survey report within 90 days of the sanitary survey?						
F. If significant deficiencies were not within 30 days, did the LPA issue an enforcement action to the water system?	☒	☐	☐	☐		☐
Sampling and Monitoring (LPDA 2.04)	Y	N	N/A	Directive	Recommendation	Based on File Review
A. Does the LPA provide the water quality monitoring and reporting requirements to their water systems in writing?	☒	☐	☐	☐		☐
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 annually (except for RTCR)?	☒	☐	☐		☐	
C. Does the LPA receive, review, and track monthly SWTR reports?	☒	☐	☐	☐		☐
D. For groundwater treated systems, including precautionary and mandatory disinfection, does the LPA receive, review and track compliance of monthly operation reports?	☒	☐	☐	☐		☐
E. Does each public water system have a current (<10 yrs.) and complete Bacteriological Sample Siting Plan (BSSP) on file?	☒	☐	☐	☐		☐
F. Does the BSSP comply with the Ground Water Rule and RTCR?	☒	☐	☐	☐		☐
G. Is the LPA reviewing and monitoring CCR submissions by CWS and NTNC water systems?	☒	☐	☐	☐		☐
H. Is the LPA monitoring submission of the CCR verification forms?	☒	☐	☐	☐		☐
I. Has the LPA issued any water quality monitoring waivers, exemptions, or variances that <u>differ</u> from what is allowed in the CCR-Title 22 during applicable the fiscal year? (i.e. Sec. 64445(d))	☐	☐	☒	☐		☐
J. Do the applicable LPA staff have an mDWW account and refer to it?	☒	☐	☐		☐	

Attachment A-Evaluation Checklist

K. If a water system was found to be in violation of a monitoring and reporting water quality sampling requirement, would the LPA issue appropriate enforcement (i.e. NOVs and citations) (i.e. nitrate, arsenic, DBP, radiological, etc.)?	☒	☐	☐	☐		
L. Does the LPA reference the Analysis Reports in WQIR?	☒	☐	☐	☐		
Data Management and Reporting (LPDA 2.05)³	Y	N	N/A	Directive	Recommendation	Based on File Review
A. Is the LPA entering unsafe water notices into the Unsafe Water Notice Toolbox? (Applicable for FY2023/2024 evaluation)	☒	☐	☐			
B. Is the LPA using SDWIS to maintain and report all required data elements (i-viii)?	☒	☐				
i. Water System Inventory	☒	☐	☐	☐		
ii. Water System Contact Information	☒	☐	☐	☐		
iii. Violations	☒	☐	☐	☐		
iv. Enforcement Actions	☒	☐	☐	☐		
v. Lead and Copper Rule	☒	☐	☐	☐		
vi. Sanitary Surveys	☒	☐	☐	☐		
vii. Permits Issued (no current intake system)			☒			
viii. Source Class Codes	☒	☐	☐	☐		
ix. Facility Lat/Long Coordinates	☒	☐	☐	☐		
C. Did the LPA address errors identified in the SDWIS clean-up reports posted on WQI?	☒	☐	☐	☐	☐	
D. Is the LPA reporting data into SDWIS on or before 30 days after the last day of quarter?	☒	☐	☐	☐		
E. Does the LPA submit a PDF formatted copy of each citation or compliance order to the CEU General Inbox	☒	☐	☐	☐		
F. Does the LPA comply with the Board's guidance regarding issuance of unsafe water notifications (4/2020)?	☒	☐	☐	☐	☐	☐

³ Refer to Attachment B-Tables 2-6
Last Updated: 9/3/2024

Attachment A-Evaluation Checklist

Additional Reporting Requirements (LPDA 2.06)⁴	Y	N	N/A	Directive	Recommendation	Based on File Review
A. Did the LPA meet the task deadlines for the Electronic Annual Report (EAR)?	☒	☐				
i. Written notice to water system	☒	☐	☐	☐		☐
ii. Review and accept EARs	☒	☐	☐	☐		
iii. Issue reminders to delinquent water systems	☒	☐	☐	☐		
iv. Issue enforcement against delinquent water systems	☒	☐	☐	☐		
B. Is the LPA reporting RTCR Level 1/2 Assessment activities?	☒	☐	☐	☐		
Enforcement (LPDA 2.07)⁵	Y	N	N/A	Directive	Recommendation	Based on File Review
A. Does the LPA issue enforcement actions that meet the formal action criteria?	☒	☐	☐	☐		☐
B. Is the LPA using the template website for issuing enforcement actions?	☒	☐	☐		☐	☐
C. Is the LPA following up with directives listed in the enforcement actions?	☒	☐	☐		☐	☐
D. Does the LPA review, approve, and track the receipt of public notifications issued by the water systems?	☒	☐	☐	☐	☐	
E. Are enforcement actions issued in a timely manner?	☒	☐	☐	☐		☐
F. Does the LPA include the appeal language in all cover letters for enforcement actions issued?	☒	☐	☐			☐
G. Does the LPA have a process in place to issue administrative or civil penalties to a water system when necessary to achieve compliance?	☒	☐	☐	☐		
H. 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.	☐	☐	☒	☐		
I. Did the LPA issue administrative or civil penalties to a water	☒	☐	☐	☐		

⁴ Refer to Attachment B-Tables 7-8

⁵ Refer to Attachment B-Tables 5

Last Updated: 9/3/2024

Attachment A-Evaluation Checklist

system when necessary to achieve compliance?						
J. Did the LPA receive any petitions for reconsideration (i.e. appeals) from public water system?	☐	☒	☐	☐		
K. If yes, did the LPA report the petition to the DDW within 5 days?	☐	☐	☐	☐		
Program Management (LPDA 3.01-3.09)⁶	Y	N	N/A	Directive	Recommendation	Based on File Review
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?	☐	☒	☐	☐	☒	
B. Does the LPA have a time accounting system in place as required in CCR section 64259 (b)?	☒	☐	☐	☐		
C. Does the LPA have a file management system that meets CCR section 64259 (b)?	☒	☐	☐	☐		☐
D. Does the LPA refer to the Division's Tech Hub for information and guidance documents relating to SDWIS and Program requirements?	☒	☐	☐		☐	
Other Items	Y	N	N/A	Directive	Recommendation	Based on File Review
A. Has the LPA addressed all past fiscal year evaluations directives?	☒	☐	☐	☐		
B. Does the LPA attend the DDW trainings and/or read the monthly news?	☒	☐	☐		☐	
C. Does the LPA have any 2013 grant funding available? If yes, amount: \$0	☐	☒	☐		☐	

⁶ Refer to Attachment B-Tables 9-10
Last Updated: 9/3/2024

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

County Name: Sacramento

Date: 11/21/2024

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)	Sheldon Acres Dev Center (C/O) (new name Moore Learning) Brannan's Island (C/O) (new name Brothers Island Marina) The Wrangler Bar Dillard Store	River's Edge (C/O) San Andreas MHP (C/O) Wilton Chevron (C/O)	McClellan (waiting app & TMF) Riverboat Marina (waiting app & TMF) Perry's Boat/Delta Paradise (waiting app & TMF)	6 7 (added Riverboat Marina from 10 Yr review to C/O)
Amended Permit (Treatment or Other)	Walnut Grove Marina (replaced tank)	Holiday Mobile Village (replaced tanks)	Freeport Marina (Mn treatment)	2

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

	Edgewater MHP			
Full or Amended Permit¹ 10-Year Review	Franklin ES Hood Water System Slavic Missionary Church STS Subway Sandwich			7-5 Note: removed Willow Berm (did not need permit update, same owner); Moved Riverboat Marina to C/O column
TOTAL NUMBER PERMITS ISSUED	11	4		

¹ - if necessary

* Any "not permitted" were not ready for completion of permitting process [Note: Due to Division approved situations including, but not limited to: system not active, permitting process not completed, system consolidation, previously issued permit remains valid. LPA to include brief note with system identification and why not permitted.]

NUMBER OF PUBLIC WATER SYSTEMS CURRENTLY <u>WITHOUT</u> A WATER SUPPLY PERMIT	0
--	----------

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*
Community Water System	12		12
Non-transient Non-community Water System	2		2
Non-community Water System	4	5 (Bert's Diner, Circle K, River's Edge, Twin Palms, Wilton Chevron)	4
TOTAL NUMBER SANITARY SURVEYS ISSUED	18	5	18

1-Sanitary survey required frequency is every 3 years

2-Sanitary survey required frequency is every 5 years

* Any "not completed" were not required during fiscal year [Note: Due to Division approved situations including, but not limited to: system not active, not due for SNSV, completed in prior fiscal year, system consolidation. LPA to include brief explanation with system identification and why not inspected.]

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)	30	29	70
Groundwater-Purchased	1		
Surface Water (includes Groundwater Under Direct Influence of Surface Water)			
Surface Water-Purchased		2	
TOTAL	31	31	70

Water System Type	Number of Water Systems
State Small *	7

* For Informational Use Only, Not Evaluated

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

Table 4: Summary of Violations

Violation Category Type	Number of Violations
Monitoring (MON)	2 MON
Reporting (RPT)	2 RPT 14 EAR
Maximum Contaminant Level (MCL)	6 MRDL (maximum residual disinfectant level) 1. Lighthouse Marina July 23 2. Bert's Diner Feb 24 3. Delta Paradise May 24 4. Delta Paradise July 24 5. CRIA March 24 6. Wilton Chevron Feb 24 5 E.coli MCL (Bert's Diner, Bradshaw Christian School, River's Edge, Wilton Bible, Wilton Chevron)

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

Treatment Technique (TT)	32 TT
	July 23 (Sac Valley Truck Stop, Teichert Perkins) August 23 (Rancho Seco NGS, San Andreas) September 23 (Church of LDS, Dillard ES, Rancho Seco NGS, Village Bradshaw) October 23 (Happy Harbor) November 23 (Gibson Ranch, Matsuda's) December 23 (Grand Island Mansion, RSP, Valley Hi) January 24 (Bert's Diner, Eddo's, Grand Island, Wilton Bible Church) February 24 (Circle K) March 24 (Apro 1966, Brookside, Matsuda's, Sloughhouse) April 24 (B&W, Bradshaw Christian School, Dillard Store, Matsuda's, Village Bradshaw) May 24 (Sloughhouse) June 24 (RSNGS, Sheldon Liquor, Sherman Lake Marina)

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

Violation Category Type	Number of Violations
Public Notification (PN)	7 Boil water 1 Do not use 1 Failure to meet bact monitoring (Rancho Seco Park 4 th Q)
Variance/Exemption (V/E)	
Sanitary Survey (SS)	
Operator Certification (SSRS)	
Permit Condition (PC)	
Other	
TOTAL NUMBER OF VIOLATIONS	68

TOTAL NUMBER OF VIOLATIONS THAT NEED AN ENFORCMENT ACTION ISSUED?	0
--	----------

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

Table 5: Summary of Enforcement Actions Issued

Enforcement Action Type	Number of Enforcement Actions Issued
Formal Enforcement Actions (Compliance Order and Citations)	25 Citations & 1 CO (Tokay)
Informal Enforcement Actions (Notice of Violation or Enforcement Letter)	32 NOV
Other Enforcement Actions	5
Return to Compliance Actions	35
TOTAL NUMBER OF ENFORCEMENT ACTIONS ISSUED	63

SFJ- Formal, SFO- Informal, SOX- In Compliance

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
3Q2023 (7/1-9/30)	15
4Q2023 (10/1-12/31)	
1Q2024 (1/1-3/31)	
2Q2024 (4/1-6/30)	1

Table 7: rTCR ASSESSMENTS

	Level 1 Assessment	Level 2 Assessment
TOTAL NUMBER OF RTCR ASSESSMENTS CONDUCTED	11	7 (Bert's Diner, River's Edge, RSNGS, Wilton Chevron, Wilton Bible Church, Circle K, Gibson Ranch (due to 2nd level 1 TT)

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 (%)	Need Revision (%)	In Process (%)	Submitted (%)	Completed (%)
Community Water System	3%		3%		94%
Non-community Non-transient Water System	3%		3%	3%	91%
Transient Non-community Water System	11%		1%		88%
Total					90%

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

Table 9: Fiscal Year Staff Time Allocation to LPA Program

Position Title	Time allocated to program (direct cost hours only*)
Environmental Health Specialist IV	313
Environmental Health Specialist III	1209
TOTAL HOURS	1522

*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.

Table 10: LPA Water System Annual Operating Permit Fees

Fee Description	Current Fee
Community Water Systems	\$2446 - \$4165
Non-Transient Non-Community Water Systems	\$1803 - \$3515
Transient Non-Community Water Systems	\$1144 - \$1978
Enforcement (Hourly Rate)	\$232

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

ADDITIONAL QUESTIONS:

Attachment A- Permitting Section E:

What is the process for LPA staff to track water supply permits? How are permits and tracking made accessible to LPA staff?

LPA Response: Printed permits are saved in our internal database, accessible to all authorized users. HS can generate a full list of small water systems and filter the list by permit issue dates.

Attachment A-Sampling and Monitoring Section C:

Walk us through the process for receiving/reviewing/ and tracking monthly SWTR reports?

LPA Response: SCWA sends me monthly treatment operations reports for SIA and Metro Air Park, which I review and save in EMD W Drive.

Attachment A-Sampling and Monitoring Section E:

What is the established approval process for a BSSP that is greater than 10 years old?

LPA Response: BSSP > 10 yr must be renewed. Sanitary surveys inspections are a main review point for BSSPs.

**State Water Resource Control Board-County Engagement Unit
LPA File Review Form**

County Name: SACRAMENTO

Water System Name: SAC CITY MOBILE HOME COMMUNITY LP

Water System Number: CA3700296

Water System Classification: ☒ Community ☐ NTNC ☐ Transient ☐ Other:

System Physical Location Address: 6025 DIAS AVE, SACRAMENTO, CA 95824

Minimum Required Operator Level ☒ D1 ☐ D2 ☐ D3 ☐ D4 ☐ D5 ☐ T1 ☐ T2 ☐ T3 ☐ T4 ☐ T5

File Review Conducted By: Brendan O'Sullivan

File Review Date: November 21, 2024

Permit Information	Y	N	N/A	Directive	Recommendation	Notes
A. Is Permit formatted using the templates on provided in the Water Supply Permit Guide?	☒	☐	☐	☐	☐	
B. Is Permit > 10 years old & reflect current PWS	☒	☐	☐	☐	☐	3/8/18
C. Application	☒	☐	☐	☐	☐	
D. Tech. Report/Sanitary Survey	☒	☐	☐	☐	☐	
E. New PWS only – Prelim. Tech. Report	☐	☐	☒	☐	☐	
F. New PWS only – DE concurrence	☐	☐	☒	☐	☐	
G. TMF Assessment (new and change of ownership only)	☐	☐	☒	☐	☐	
H. Design & specs	☒	☐	☐	☐	☐	
I. New sources – Well completion report	☐	☐	☒	☐	☐	
J. New sources – 50' well site control zone source identified	☐	☐	☒	☐	☐	
Sanitary Survey	Y	N	N/A	Directive	Recommendation	Notes
A. Most recent sanitary survey includes detailed information on:						3/18/2024
i. Source(s)	☒	☐	☐	☐	☐	
ii. Distribution	☒	☐	☐	☐	☐	

**State Water Resource Control Board-County Engagement Unit
LPA File Review Form**

iii. Treatment	☒	☐	☐	☐	☐	
iv. Storage	☒	☐	☐	☐	☐	
v. Pump Facilities	☒	☐	☐	☐	☐	
vi. Monitoring/Reporting/ Data Verification	☒	☐	☐	☐	☐	
vii. Management/Operation	☒	☐	☐	☐	☐	
viii. Operator Certification	☒	☐	☐	☐	☐	
B. Cross-connection control program information						
C. For community PWSs only- evaluates resiliency and preparedness	☒	☐	☐	☐	☐	
D. Did the DE approve the sanitary survey report template?	☒	☐	☐	☐	☐	
E. Past due based on PWS classification (3 or-5-years)	☐	☒	☐	☐	☐	
F. Deficiencies and corrective plan provided to PWS w/in 60 days	☒	☐	☐	☐	☐	
G. Written report provided to PWS w/in 90 days	☒	☐	☐	☐	☐	
H. Sanitary survey in SDWIS	☒	☐	☐	☐	☐	
Source Information	Y	N	N/A	Directive	Recommendation	Notes
A. Source information is clearly defined, including source type and number of sources.	☒	☐	☐	☐	☐	
B. Has treated sources (i.e. Cl ₂ , GAC, POU/POE, etc.)	☒	☐	☐	☐	☐	Continuous chlorination
C. Cl ₂ Required or Optional (Precautionary)	☒	☐	☐	☐	☐	
D. Bottle water provided	☐	☐	☒	☐	☐	Emergency tie-in to CalAM
E. Active sources in SDWIS	☒	☐	☐	☐	☐	

**State Water Resource Control Board-County Engagement Unit
LPA File Review Form**

Operation Plans	Y	N	N/A	Directive	Recommendation	Notes
A. Current Bacteriological Sample Siting Plan (BSSP)	☒	☐	☐	☐	☐	
B. Is BSSP >10 years old?	☐	☒	☐	☐	☐	2021
C. BSSP includes:	☒	☐	☐	☐	☐	
i. PWS Information	☒	☐	☐	☐	☐	
ii. Sample Collection Information	☒	☐	☐	☐	☐	
iii. Distribution Sampling Frequency	☒	☐	☐	☐	☐	
iv. Raw Sampling Triggered / Compliance	☒	☐	☐	☐	☐	
v. Consecutive PWS Info. (if applicable)	☐	☐	☒	☐	☐	
vi. Wholesale PWS Info. (if applicable)	☐	☐	☒	☐	☐	
vii. PWS Map	☒	☐	☐	☐	☐	
viii. GWR compliant	☒	☐	☐	☐	☐	
ix. Sampling Location/Frequency/Descriptions	☒	☐	☐	☐	☐	
x. Preparer Information, Date, and Signature	☒	☐	☐	☐	☐	
D. BSSP approved by LPA	☒	☐	☐	☐	☐	
E. BSSP needs to be updated and submitted to LPA?	☐	☒	☐	☐	☐	
F. Current Emergency Notification Plan (ENP)	☒	☐	☐	☐	☐	
G. ENP template approved by DE						
H. ENP needs to be updated and submitted to LPA?	☒	☐	☐	☐	☐	
I. Treatment operations plan(s)	☒	☐	☐	☐	☐	

**State Water Resource Control Board-County Engagement Unit
LPA File Review Form**

Water Quality Monitoring	Y	N	N/A	Directive	Recommendation	Notes
A. Bacteriological MCL/TT and/or M&R issues	☐	☐	☐	☐	☐	
i. 3 or more MCL w/in 12 month period	☐	☐	☐	☐	☐	If yes, continuous Cl ₂ is advised.
ii. L1 assessment after L1 trtmnt trigger						
iii. L2 assessment after L2 trtmnt trigger						
B. In compliance with source/distribution WQ Sampling:						
i. Inorganic Chemicals (IOC)	☒	☐	☐	☐	☐	
ii. Volatile Organic Chemicals (VOC)	☒	☐	☐	☐	☐	
iii. Synthetic Organic Chemicals (SOC)	☐	☐	☒	☐	☐	SOC N/A
iv. Radiological Chemicals	☒	☐	☐	☐	☐	
v. Nitrate/Nitrite Chemicals :	☒	☐	☐	☐	☐	
vi. Lead and Copper Rule	☒	☐	☐	☐	☐	
vii. DBPR Chemicals	☒	☐	☐	☐	☐	
C. Unaddressed MCL and/or M&R issues	☐	☒	☐	☐	☐	
D. Samples EDT to the State WQ database (CLIP)	☒	☐	☐	☐	☐	
Consumer Confidence Reports (CWS and NTNC only)	Y	N	N/A	Directive	Recommendation	Notes
A. Copy of previous year CCR	☒	☐	☐	☐	☐	
B. CCR meets the reporting requirements	☒	☐	☐	☐	☐	
C. Is LPA using templates from DDW website?	☒	☐	☐	☐	☐	

**State Water Resource Control Board-County Engagement Unit
LPA File Review Form**

D. If no, has LPA addressed the deficiencies with PWS?	☐	☐	☒	☐	☐	
E. Verification form	☒	☐	☐	☐	☐	
Enforcement Actions	Y	N	N/A	Directive	Recommendation	Notes
A. Enforcement actions issued are appropriate for the type of violation(s) (i.e., informal vs. formal EA)	☒	☐	☐	☐	☐	
B. Tier 1/Tier 2 PN only – copy of public notification notices included	☒	☐	☐	☐	☐	
C. Public notification notices have deficiencies/mistakes	☒	☐	☐	☐	☐	
Operational Reports	Y	N	N/A	Directive	Recommendation	Notes
A. Monthly SWTR monitoring reports	☐	☐	☒	☐	☐	
B. SWTR reports use the State template	☐	☐	☒	☐	☐	
C. Quarterly TOC monitoring reports (conventional treatment only)	☒	☐	☐	☐	☐	
D. TOC reports use the State template	☒	☐	☐	☐	☐	
E. DBPR monitoring plan (Chlorinated CWS and NTNC only)	☒	☐	☐	☐	☐	

**State Water Resource Control Board-County Engagement Unit
LPA File Review Form**

County Name: SACRAMENTO

Water System Name: FRANKLIN ELEMENTARY SCHOOL

Water System Number: CA3400248

Water System Classification: ☐ Community ☒ NTNC ☐ Transient ☐ Other:

System Physical Location Address: 4011 HOOD FRANKLIN RD, EL GROVE, CA 95757

Minimum Required Operator Level ☒ D1 ☐ D2 ☐ D3 ☐ D4 ☐ D5 ☐ T1 ☒ T2 ☐ T3 ☐ T4 ☐ T5

File Review Conducted By: Brendan O'Sullivan

File Review Date: November 21, 2024

Permit Information	Y	N	N/A	Directive	Recommendation	Notes
A. Is Permit formatted using the templates on provided in the Water Supply Permit Guide?	☒	☐	☐	☐	☐	Campus closed in 2021 -> reopened July 1 2024 just to district staff not students (new facility for students) Permit reissue June 27, 2024
B. Is Permit > 10 years old & reflect current PWS	☐	☐	☒	☐	☐	2024
C. Application	☒	☐	☐	☐	☐	
D. Tech. Report/Sanitary Survey	☒	☐	☐	☐	☐	
E. New PWS only – Prelim. Tech. Report	☐	☐	☒	☐	☐	
F. New PWS only – DE concurrence	☒	☐	☐	☐	☐	
G. TMF Assessment (new and change of ownership only)	☒	☐	☐	☐	☐	
H. Design & specs	☒	☐	☐	☐	☐	
I. New sources – Well completion report	☐	☐	☒	☐	☐	
J. New sources – 50' well site control zone source identified	☐	☐	☒	☐	☐	
Sanitary Survey	Y	N	N/A	Directive	Recommendation	Notes
A. Most recent sanitary survey includes detailed information on:						1/22/2019
i. Source(s)	☒	☐	☐	☐	☐	

**State Water Resource Control Board-County Engagement Unit
LPA File Review Form**

ii. Distribution	☒	☐	☐	☐	☐	
iii. Treatment	☒	☐	☐	☐	☐	
iv. Storage	☒	☐	☐	☐	☐	
v. Pump Facilities	☒	☐	☐	☐	☐	
vi. Monitoring/Reporting/ Data Verification	☒	☐	☐	☐	☐	
vii. Management/Operation	☒	☐	☐	☐	☐	
viii. Operator Certification	☒	☐	☐	☐	☐	
B. Cross-connection control program information						
C. For community PWSs only- evaluates resiliency and preparedness	☐	☐	☒	☐	☐	
D. Did the DE approve the sanitary survey report template?	☒	☐	☐	☐	☐	
E. Past due based on PWS classification (3 or-5-years)	☐	☒	☐	☐	☐	1/22/2024
F. Deficiencies and corrective plan provided to PWS w/in 60 days	☒	☐	☐	☐	☐	
G. Written report provided to PWS w/in 90 days	☒	☐	☐	☐	☐	
H. Sanitary survey in SDWIS	☒	☐	☐	☐	☐	
Source Information	Y	N	N/A	Directive	Recommendation	Notes
A. Source information is clearly defined, including source type and number of sources.	☒	☐	☐	☐	☐	
B. Has treated sources (i.e. Cl ₂ , GAC, POU/POE, etc.)	☒	☐	☐	☐	☐	Oxidation/filtration
C. Cl ₂ Required or Optional (Precautionary)	☒	☐	☐	☐	☐	
D. Bottle water provided	☒	☐	☐	☐	☐	Students are no longer at facility, only school admin staff; jugs available
E. Active sources in SDWIS	☒	☐	☐	☐	☐	

**State Water Resource Control Board-County Engagement Unit
LPA File Review Form**

Operation Plans	Y	N	N/A	Directive	Recommendation	Notes
A. Current Bacteriological Sample Siting Plan (BSSP)	☒	☐	☐	☐	☐	
B. Is BSSP >10 years old?	☒	☐	☐	☐	☐	6/1/2022
C. BSSP includes:	☐	☐	☐	☐	☐	
i. PWS Information	☒	☐	☐	☐	☐	
ii. Sample Collection Information	☒	☐	☐	☐	☐	
iii. Distribution Sampling Frequency	☒	☐	☐	☐	☐	
iv. Raw Sampling Triggered / Compliance	☒	☐	☐	☐	☐	
v. Consecutive PWS Info. (if applicable)	☐	☐	☒	☐	☐	
vi. Wholesale PWS Info. (if applicable)	☐	☐	☒	☐	☐	
vii. PWS Map	☒	☐	☐	☐	☐	
viii. GWR compliant	☒	☐	☐	☐	☐	
ix. Sampling Location/Frequency/Descriptions	☒	☐	☐	☐	☐	
x. Preparer Information, Date, and Signature	☒	☐	☐	☐	☐	
D. BSSP approved by LPA	☒	☐	☐	☐	☐	
E. BSSP needs to be updated and submitted to LPA?	☐	☒	☐	☐	☐	
F. Current Emergency Notification Plan (ENP)	☒	☐	☐	☐	☐	2022
G. ENP template approved by DE	☒	☐	☐	☐	☐	
H. ENP needs to be updated and submitted to LPA?	☐	☒	☐	☐	☐	
I. Treatment operations plan(s)	☒	☐	☐	☐	☐	

**State Water Resource Control Board-County Engagement Unit
LPA File Review Form**

Water Quality Monitoring	Y	N	N/A	Directive	Recommendation	Notes
A. Bacteriological MCL/TT and/or M&R issues	☐	☐	☐	☐	☐	
i. 3 or more MCL w/in 12 month period	☐	☐	☐	☐	☐	If yes, continuous Cl ₂ is advised.
ii. L1 assessment after L1 trtmnt trigger						
iii. L2 assessment after L2 trtmnt trigger						
B. In compliance with source/distribution WQ Sampling:						
i. Inorganic Chemicals (IOC)	☒	☐	☐	☐	☐	Iron is a little high but LPA is aware are working with LPA
ii. Volatile Organic Chemicals (VOC)	☒	☐	☐	☐	☐	
iii. Synthetic Organic Chemicals (SOC)	☒	☐	☐	☐	☐	
iv. Radiological Chemicals	☒	☐	☐	☐	☐	
v. Nitrate/Nitrite Chemicals :	☒	☐	☐	☐	☐	
vi. Lead and Copper Rule	☒	☐	☐	☐	☐	Due this year -> sampled pending upload
vii. DBPR Chemicals	☒	☐	☐	☐	☐	
C. Unaddressed MCL and/or M&R issues	☐	☒	☐	☐	☐	
D. Samples EDT to the State WQ database (CLIP)	☒	☐	☐	☐	☐	
Consumer Confidence Reports (CWS and NTNC only)	Y	N	N/A	Directive	Recommendation	Notes
A. Copy of previous year CCR	☒	☐	☐	☐	☐	
B. CCR meets the reporting requirements	☒	☐	☐	☐	☐	
C. Is LPA using templates from DDW website?	☒	☐	☐	☐	☐	

**State Water Resource Control Board-County Engagement Unit
LPA File Review Form**

D. If no, has LPA addressed the deficiencies with PWS?	☐	☐	☒	☐	☐	
E. Verification form	☒	☐	☐	☐	☐	
Enforcement Actions	Y	N	N/A	Directive	Recommendation	Notes
A. Enforcement actions issued are appropriate for the type of violation(s) (i.e., informal vs. formal EA)	☒	☐	☐	☐	☐	
B. Tier 1/Tier 2 PN only – copy of public notification notices included	☒	☐	☐	☐	☐	
C. Public notification notices have deficiencies/mistakes	☐	☒	☐	☐	☐	
Operational Reports	Y	N	N/A	Directive	Recommendation	Notes
A. Monthly SWTR monitoring reports	☐	☐	☒	☐	☐	No SW systems
B. SWTR reports use the State template	☐	☐	☒	☐	☐	
C. Quarterly TOC monitoring reports (conventional treatment only)	☒	☐	☐	☐	☐	
D. TOC reports use the State template	☒	☐	☐	☐	☐	
E. DBPR monitoring plan (Chlorinated CWS and NTNC only)	☒	☐	☐	☐	☐	