



CITY of NAPA

www.cityofnapa.org

September 8, 2015

Sheri Miller, P.E.
Mendocino District Engineer
State Water Resources Control Board
Division of Drinking Water
50 D Street, Suite 200
Santa Rosa, CA 95404

EDWARD I. BARWICK
JAMIESON CANYON WATER TREATMENT PLANT
PUBLIC WORKS DEPARTMENT
270 Kirkland Ranch Road
P.O. Box 660
Mailing Address:
P.O. Box 660
Napa, California 94559-0660
Phone: 707-253-0822
Fax: 707-253-1225
TTY: (707) 257-9506

RE: City of Napa, July 2015 Citation #: 02-03-15C002; Certification of Compliance for Public Notification(s) and OEL Completion

Dear Ms. Miller,

This letter confirms the City of Napa has completed the Public Notifications and Completed OEL Forms for the July 2015 Citation #: 02-03-15C002 as specified in the Certification of Compliance Appendix 3 for 770 Jackson Street, 2442 Allegheny Drive and 4152 Browns Valley Road. A copy of the updated Certification of Compliance is included for your reference. As approved, the City of Napa has completed the limited scope of OE Reporting forms for 770 Jackson Street, 2442 Allegheny Drive, 3278 Stonebridge Court, and 1072 Darms Lane.

The City finalized the installation of the aerator/blower system in the Hennessey Finished Tank on Friday, August 21, 2015 and we look forward to future water quality information. We are currently working on the same installation for our "A" Tank located within the distribution system and hope to have it completed by the October 2015 sample session.

We appreciate your review of the attached materials and if you have any questions or concerns, please call (707) 253-0822.

Respectfully submitted,

Erin Kebbas
Water Quality Manager

Attachments:

1. Certification of Compliance, Appendix 3
2. Copy of Public Notification as Mailed via USPS
3. Screen Shot of City of Napa Webpage Link for Public Notification for Residents
4. City of Napa OE Reporting Forms
5. Limited OE Scope Approval

Cc (via email): Joy Eldredge, Water General Manager
Bob Janowski, Water Treatment Manager
Amy Little, SWRCB Associate Sanitary Engineer

CERTIFICATION OF COMPLIANCE

Citation Number 02-03-15C002

Name of Water System: **City of Napa**

System Number: **2810003**

Certification

As required by Section 64463.4 of the California Code of Regulations, I certify that the identified users of the water supplied by the **City of Napa** were notified of the violations of Title 22, California Code of Regulations (CCR) for the compliance period ending in the 1st Quarter 2015. In addition, I certify that the City of Napa has complied with the directives of this citation as indicated below:

Required Action	Date Completed
Public Notification – Mail or Hand Delivery by 9/21/2015*	09-08-15
Public Notification – Newspaper or Internet by 9/21/2015*	08-31-15

Erin Kehlas
 Signature of Water System Representative

09-08-15
 Date

**Attach a copy of the notice delivered to customers and a copy of the notice published in the newspaper or internet.*

**THIS FORM MUST BE COMPLETED AND RETURNED TO THE DEPARTMENT BY
 September 31, 2015**

Disclosure: Be advised that Section 116725 and 116730 of the California Health and Safety Code states that any person who knowingly makes any false statement on any report or document submitted for the purpose of compliance with the attached order may be liable for a civil penalty not to exceed five thousand dollars (\$5,000) for each separate violation for each day that violation continues. In addition, the violators may be prosecuted in criminal court and upon conviction, be punished by a fine of not more than \$25,000 for each day of violation, or be imprisoned in county jail not to exceed one year, or by both the fine and imprisonment.

02-03-15C002



IMPORTANT INFORMATION ABOUT YOUR DRINKING WATER in accordance with the Drinking Water Disinfection Byproduct Rule – Stage II

Este informe contiene información muy importante sobre su agua potable.
Para información en español sobre este artículo, por favor llame al 707-258-7899 y oprima
extensión #7743 en cuanto escuche la grabación

City of Napa Has Detected Levels of Disinfection Byproducts Above Drinking Water Standards

As a follow up to the notification letter you received regarding our January 2015 sampling event for disinfection byproducts, our recent round of quarterly compliance sampling in your area took place on July 21st. The annual average of trihalomethanes in your area is 81.35 *ug/L* which is above the target level of 80 *ug/L*, and we are required to notify you of this information. As our customers, we want you to know what happened, what you should do, and what we are doing to correct this situation.

What happened?

To protect drinking water from disease-causing organisms, or pathogens, chlorine is added to drinking water as a disinfectant. However, disinfection byproducts can form when organic-rich water, is disinfected. A major challenge for the City of Napa and all municipal water systems is how to control and limit risks from pathogens and simultaneously minimize disinfection byproduct formation. Disinfection byproducts form when naturally-occurring organic matter that is present in our surface water supplies reacts with chlorine in the water system. In northern California, winter rains wash leaves and debris into the creeks and streams that make up our surface water supplies. During winter rains the levels of organic matter are highest, especially after extended drought periods when the matter has accumulated in the watersheds over a longer period of time.

We routinely monitor for the presence of drinking water contaminants throughout the entire water system. As of October 2012, the standard that applies to the City of Napa's system for disinfection byproducts changed significantly. The maximum limit for the annual average of trihalomethanes at each location is 80 micrograms per liter (*ug/L*). The July 2015 result for trihalomethanes in your area of 85.0 *ug/L* makes the running annual average 81.35 *ug/L* which is above the target limit, therefore requiring this notification.



What should I do?

No specific corrective actions are needed. You do not need to boil your water. However, if you have specific health concerns, consult your doctor.

What does this mean?

This is not an emergency. If it had been, we would have notified you immediately. The scientific study that is the basis for this regulation showed that some people who drink 2 liters (more than a half-gallon) of water every day containing disinfection byproducts in excess of the maximum limit over a 70-year period may experience liver, kidney, or central nervous system problems, and may have an increased risk of getting cancer. These diseases, however, are not caused solely by chemicals in drinking water, but result from many other factors. Scientists continue to study disinfection byproducts to better understand potential health effects.

What is being done?

We continually work to protect the watersheds and our source water quality with the goal of minimizing organic content in the water. We are working to reduce the detention time in the water system before it reaches your tap so that there is less time for the byproducts to form. This is more challenging during drought years since people are using less water due to the state mandate. Meanwhile it is important that we have ample water stored in our tanks to provide water for emergency fire-flow purposes or to maintain water supply in case a major pipeline needs to be repaired. We have modified our system operations to make sure that all tank levels are drawn down and refilled every day to insure the water does not age. We have also installed mixers in our tanks to keep the water moving.

In the short term we are adding aerators in several of our tanks to help volatilize disinfection byproducts out of the water. The aerators have already been designed and are being manufactured. One has recently been installed in the Hennessey finished water tank and the other will be installed prior to the October sampling event.

In the long term we are working to develop sufficient funds to upgrade our water treatment process which may include granular activated carbon (GAC) however it is very costly upfront and has high ongoing costs (over a million dollars per year) for regeneration of the media. Our current water rates cannot support that cost and we will continue to explore all options to reduce trihalomethanes and carefully weigh the costs and benefits. We will continue to inform you on a quarterly basis if the problem persists.

For more information, please call (707) 253-0822 and ask to speak with Erin Kebbas Water Quality Manager for the City of Napa. The mailing address is PO Box 660, Napa, CA 94559-0660 or visit www.cityofnapa.org/water for more information and FAQs.



This notice is being sent to you by the City of Napa.

State Water System ID#: 2810003

Date distributed: August 31, 2015



Potentially Affected Area

Secondary Notification Requirements

Please share this information with all the other people who drink this water, especially those who may not have received this public notice directly (for example, people in apartments, nursing homes, schools, and businesses).



IMPORTANT INFORMATION ABOUT YOUR DRINKING WATER in accordance with the Drinking Water Disinfection Byproduct Rule – Stage II

Este informe contiene información muy importante sobre su agua potable.
Para información en español sobre este artículo, por favor llame al 707-258-7899 y oprima
extensión #7743 en cuanto escuche la grabación

City of Napa Has Detected Levels of Disinfection Byproducts Above Drinking Water Standards

Our water system recently exceeded a new drinking water standard for trihalomethanes in the vicinity of your service meter. As our customers, you have a right to know what happened, what you should do, and what we are doing to correct this situation.

What happened?

To protect drinking water from disease-causing organisms, or pathogens, chlorine is added to drinking water as a disinfectant. However, disinfection byproducts can form when organic-rich water, is disinfected. A major challenge for the City of Napa and all municipal water systems is how to control and limit risks from pathogens and simultaneously minimize disinfection byproduct formation. Disinfection byproducts form when naturally-occurring organic matter that is present in our surface water supplies reacts with chlorine in the water system. In northern California, winter rains wash leaves and debris into the creeks and streams that make up our surface water supplies. During winter rains the levels of organic matter are highest, especially after extended drought periods when the matter has accumulated in the watersheds over a longer period of time.

We routinely monitor for the presence of drinking water contaminants throughout the entire water system. As of October 2012, the standard that applies to the City of Napa's system for disinfection byproducts changed significantly. Samples are taken quarterly or every three months and averaged over a year to determine if they are in compliance. The maximum limit for the annual average of trihalomethanes at each location is 80 micrograms per liter (ug/L). The annual average including the recent July 2015 results for trihalomethanes in your area was *80.65 ug/L* and therefore requires this notification.

What should I do?

No specific corrective actions are needed. You do not need to boil your water. However, if you have specific health concerns, consult your doctor.



What does this mean?

This is not an emergency. If it had been, we would have notified you immediately. The scientific study that is the basis for this regulation showed that some people who drink 2 liters (more than a half-gallon) of water every day containing disinfection byproducts in excess of the maximum limit over a 70-year period may experience liver, kidney, or central nervous system problems, and may have an increased risk of getting cancer. These diseases, however, are not caused solely by chemicals in drinking water, but result from many other factors. Scientists continue to study disinfection byproducts to better understand potential health effects.

What is being done?

We continually work to protect the watersheds and our source water quality with the goal of minimizing organic content in the water. We are working to reduce the detention time in the water system before it reaches your tap so that there is less time for the byproducts to form. This is more challenging during drought years since people are using less water due to the state mandate. Meanwhile it is important that we have ample water stored in our tanks to provide water for emergency fire-flow purposes or to maintain water supply in case a major pipeline needs to be repaired. We have modified our system operations to make sure that all tank levels are drawn down and refilled every day to insure the water does not age. We have also installed mixers in our tanks to keep the water moving.

In the short term we are adding aerators in several of our tanks including the Alston Park Tank and the Lake Hennessey treated water tank to help volatilize disinfection byproducts out of the water. The aerators have already been designed and are being manufactured. They will be installed prior to the October sampling event.

In the long term we are working to develop sufficient funds to upgrade our water treatment process which may include granular activated carbon (GAC) however it is very costly upfront and has high ongoing costs (over a million dollars per year) for regeneration of the media. Our current water rates cannot support that cost and we will continue to explore all options to reduce trihalomethanes and carefully weigh the costs and benefits. We will continue to inform you on a quarterly basis if the problem persists.

For more information, please call (707) 253-0822 and ask to speak with Erin Kebbas Water Quality Manager for the City of Napa. The mailing address is PO Box 660, Napa, CA 94559-0660 or visit www.cityofnapa.org/water for more information and FAQs.

This notice is being sent to you by the City of Napa.



IMPORTANT INFORMATION ABOUT YOUR DRINKING WATER in accordance with the Drinking Water Disinfection Byproduct Rule – Stage II

Este informe contiene información muy importante sobre su agua potable.
Para información en español sobre este artículo, por favor llame al 707-258-7899 y oprima
extensión #7743 en cuanto escuche la grabación

City of Napa Has Detected Levels of Disinfection Byproducts Above Drinking Water Standards when considering an entire year

As a follow up to the notification letter you received regarding our April sampling event for disinfection byproducts, our recent round of quarterly compliance sampling in your area took place on July 21st. The level of trihalomethanes was 50.0 *ug/L* which is below the target level of 80 *ug/L*. However, compliance is based on four quarters of data sampled over a year (annual average) and that figure is 86.73 *ug/L*. As our customers, we want you to know what happened, what you should do, and what we are doing to correct this situation.

What happened?

To protect drinking water from disease-causing organisms, or pathogens, chlorine is added to drinking water as a disinfectant. However, disinfection byproducts can form when organic-rich water, is disinfected. A major challenge for the City of Napa and all municipal water systems is how to control and limit risks from pathogens and simultaneously minimize disinfection byproduct formation. Disinfection byproducts form when naturally-occurring organic matter that is present in our surface water supplies reacts with chlorine in the water system. In northern California, winter rains wash leaves and debris into the creeks and streams that make up our surface water supplies. During winter rains the levels of organic matter are highest, especially after extended drought periods when the matter has accumulated in the watersheds over a longer period of time.

In late 2014, we experienced levels of disinfection byproducts that were higher than we have seen in the past. Two major contributing factors are the drought and the high number of water main breaks we experienced for not only weeks, but for six months after the August earthquake. When sections of pipe need to be isolated to facilitate repairs, water is forced to flow in different directions. This reversal of flow can not only stir up organic matter in the pipes, but increase the age of the water due to the changed flow patterns thereby increasing the potential for disinfection byproduct formation.



We routinely monitor for the presence of drinking water contaminants throughout the entire water system. As of October 2012, the standard that applies to the City of Napa's system for disinfection byproducts changed significantly. The maximum limit for the annual average of trihalomethanes at each location is 80 micrograms per liter (ug/L). As previously mentioned, the July 2015 results for trihalomethanes in your area were 50.0 ug/L which is below the target level. The April 2015 data was also below the target, however since the annual average exceeds 80 ug/L you are receiving this notification. It should be noted that the annual average still includes the unusually high result of 129.1 ug/L from the third quarter last year just after the August 2014 earthquake.

What should I do?

No specific corrective actions are needed. You do not need to boil your water. However, if you have specific health concerns, consult your doctor.

What does this mean?

This is not an emergency. If it had been, we would have notified you immediately. The scientific study that is the basis for this regulation showed that some people who drink 2 liters (more than a half-gallon) of water every day containing disinfection byproducts in excess of the maximum limit over a 70-year period may experience liver, kidney, or central nervous system problems, and may have an increased risk of getting cancer. These diseases, however, are not caused solely by chemicals in drinking water, but result from many other factors. Scientists continue to study disinfection byproducts to better understand potential health effects.

What is being done?

We continually work to protect the watersheds and our source water quality with the goal of minimizing organic content in the water. We are working to reduce the detention time in the water system before it reaches your tap so that there is less time for the byproducts to form. This is more challenging during drought years since people are using less water due to the state mandate. Meanwhile it is important that we have ample water stored in our tanks to provide water for emergency fire-flow purposes or to maintain water supply in case a major pipeline needs to be repaired. We have modified our system operations to make sure that all tank levels are drawn down and refilled every day to insure the water does not age. We have also installed mixers in our tanks to keep the water moving.

In the short term we are adding aerators in several of our tanks to help volatilize disinfection byproducts out of the water. The aerators have already been designed and



are being manufactured. One has recently been installed in the Hennessey finished water tank and the other will be installed prior to the October sampling event.

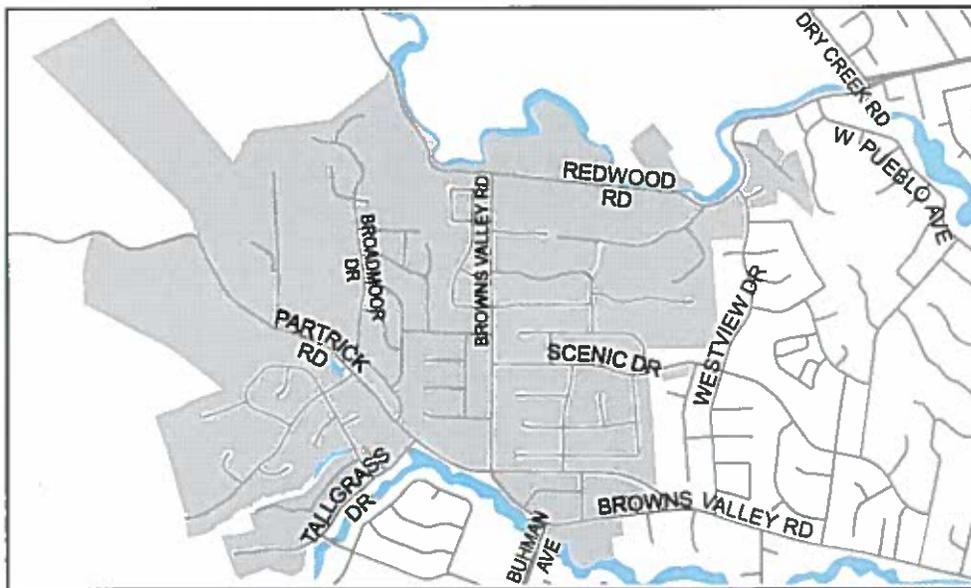
In the long term we are working to develop sufficient funds to upgrade our water treatment process which may include granular activated carbon (GAC) however it is very costly upfront and has high ongoing costs (over a million dollars per year) for regeneration of the media. Our current water rates cannot support that cost and we will continue to explore all options to reduce trihalomethanes and carefully weigh the costs and benefits. We will continue to inform you on a quarterly basis if the problem persists.

For more information, please call (707) 253-0822 and ask to speak with Erin Kebbas Water Quality Manager for the City of Napa. The mailing address is PO Box 660, Napa, CA 94559-0660 or visit www.cityofnapa.org/water for more information and FAQs.

This notice is being sent to you by the City of Napa Public Works Water Division.

State Water System ID#: 2810003

Date distributed: **August 31, 2015**



Potentially Affected Area

Secondary Notification Requirements

Please share this information with all the other people who drink this water, especially those who may not have received this public notice directly (for example, people in apartments, nursing homes, schools, and businesses).



Water Division

The Water Division is responsible for the operation, maintenance, and improvement of the municipal water system serving more than 86,000 people in the City of Napa and adjacent areas. The Division is dedicated to providing a safe and reliable supply of high quality drinking water for its residential, commercial, industrial, and institutional customers.

A comprehensive review of the City's water system is contained in the Urban Water Management Plan. The Plan describes and evaluates water supply sources, projected demand, water conservation and water shortage contingency programs, and overall water service reliability through 2035.

SPECIAL NOTICE:

Informational letters have been issued to water customers in three areas of the City regarding **Disinfection Byproducts in Drinking Water**, including **Browns Valley**, **Northwest Napa/Akston Park vicinity**, and **Jackson Street/Downtown**. These challenging new regulatory standards were thoroughly reviewed in a public meeting held on May 6. [Click to view recording.](#)

Quick Links

- Agendas and Minutes
- Boards, Commissions & Committees
- Calendars
- City Compensation Information
- Citizens Academy
- CleanGreenNapa
- Doing Business with the City
- Downtown Napa Post Office
- Downtown Specific Plan
- Drought Information
- Emergency Information
- Film & Photo Permits
- Five-Way Intersection Project
- Hands Only CPR Initiative
- Homeless Issues
- Job Opportunities
- Municipal Code & City Charter
- New Flood Maps
- Nextdoor Network

THE DROUGHT:

Save Our Water
HELP NAPA SAVE 20% The Governor first declared a Drought State of Emergency in January 2014, encouraging all Californians to take personal actions to reduce water demand. Napa responded with its lowest annual water usage since 1995. With record low snowpack in the Sierra Nevada mountains, the Governor issued an Executive Order on April 1, 2015, seeking a 25% statewide reduction in urban water use. Because of previous conservation achieved, the City of Napa is required to reduce its water consumption by 20% for the period of June 2015 through February 2016 (compared to 2013). Together, we can meet this goal. Please visit our [Water Conservation](#) section for local water-saving ideas, including generous rebate programs, and get some great tips from the [Save Our Water](#) campaign. Customers are urged to limit lawn watering this summer and strictly adhere to all [water waste prohibitions](#). The State Water Board has adopted [statewide](#) emergency regulations to increase water conservation and the City is enforcing mandatory local prohibitions on water waste.

EMERGENCY DROUGHT REGULATIONS

REPORT WATER WASTE: Call 707-257-9521 or Email

CURRENT NEWS:

Napa beats its 20% conservation target through July, with nearly 30% water savings so far this summer.

Operational Evaluation Reporting Form

I. GENERAL INFORMATION

A. Facility Information

Facility Name: City of Napa PWSID: CA2810003
 Facility Address: PO Box 660
 City: Napa State: CA Zip: 94559

B. Report Prepared by:

(Print): Erin Kebbas Date prepared: 09-03-15
 (Signature): *Erin Kebbas*
 Contact Telephone Number: (707) 253-0822

II. MONITORING RESULTS

A. Provide the Compliance Monitoring Site(s) where the OEL was Exceeded.

770 Jackson Street (2810003-008)

Note: The site name or number should correspond to a site in your Stage 2 DBPR compliance monitoring plan.

B. Monitoring Results for the Site(s) Identified in II.A (include duplicate pages if there was more than one exceedance)

1. Check TTHM or HAA5 to indicate which result caused the OEL exceedance. TTHM HAA5

2. Enter your results for TTHM or HAA5 (whichever you checked above).

	Quarter			Operational Evaluation Value
	Results from Two Quarters Ago	Prior Quarter's Results	Current Quarter	
	A	B	C	
Date sample was collected	01-07-15	04-01-15	07-21-15	$D = (A+B+(2*C))/4$
TTHM (mg/L)	98.5	77.7	85.0	86.55
HAA5 (mg/L)	2.6	14.0	26.0	17.15

Note: The operational evaluation value is calculated by summing the two previous quarters of TTHM or HAA5 values plus twice the current quarter value, divided by four. If the value exceeds 0.080 mg/L for TTHM or 0.060 mg/L for HAA5, an OEL exceedance has occurred.

C. Has an OEL exceedance occurred at this location in the past? Yes No

If NO, proceed to item D. If YES, when did exceedance occur? January 2015

Was the cause determined for the previous exceedance(s)? Yes No

Are the previous evaluations/determinations applicable to the current OEL exceedance? Yes No

III. OPERATIONAL EVALUATION FINDINGS

A. Did the State allow you to limit the scope of the operational evaluation? Yes No
 If NO, proceed to item B. If YES, attach written correspondence from the State.

B. Did the distribution system cause or contribute to your OEL exceedance(s)? Yes No
 Possibly

If NO, proceed to item C. If YES or POSSIBLY, explain (attach additional pages if necessary):

NBA source water quality helped contribute to the seasonally high results. Sample is collected in high demand area and will be evaluated for adequate representation based on hydraulic modeling and additional Stage 2 sample location in same zone with significantly lower THM values.

C. Did the treatment system cause or contribute to your OEL exceedance(s)? Yes No
 Possibly

If NO, proceed to item D. If YES or POSSIBLY, explain (attach additional pages if necessary):

D. Did source water quality cause or contribute to your OEL exceedance(s)? Yes No
 Possibly

If NO, proceed to item E. If YES or POSSIBLY, explain (attach additional pages if necessary):

Due to continuing, potential drought conditions, NBA water was maximized so as to preserve local reservoirs in addition to public conservation efforts. The NBA source water quality is organic-rich with above average TOC, UV and chlorine demand values with low seasonal distribution demands.

E. Attach all supporting operational or other data that support the determination of the cause(s) of your OEL exceedance(s).

F. If you are unable to determine the cause(s) of the OEL exceedance(s), list the steps that you can use to better identify the cause(s) in the future (attach additional pages if necessary):

We are continually comparing our hydraulic model and water quality data for verification.

G. List steps that could be considered to minimize future OEL exceedances (attach additional pages if necessary)

We are currently working to minimize future OEL exceedances through hydraulic modeling, additional water quality testing, storage tank improvements and treatment plant operations.

H. Total Number of Pages Submitted, Including Attachments and Checklists: _____

Operational Evaluation Reporting Form

I. GENERAL INFORMATION

A. Facility Information

Facility Name: City of Napa PWSID: CA2810003
 Facility Address: PO Box 660
 City: Napa State: CA Zip: 94559

B. Report Prepared by:

(Print): Erin Kebbas Date prepared: 09-03-15
 (Signature): *Erin Kebbas*
 Contact Telephone Number: (707) 253-0822

II. MONITORING RESULTS

A. Provide the Compliance Monitoring Site(s) where the OEL was Exceeded.

2442 Allegheny Drive (2810003-011)

Note: The site name or number should correspond to a site in your Stage 2 DBPR compliance monitoring plan.

B. Monitoring Results for the Site(s) Identified in II.A (include duplicate pages if there was more than one exceedance)

1. Check TTHM or HAA5 to indicate which result caused the OEL exceedance. TTHM HAA5

2. Enter your results for TTHM or HAA5 (whichever you checked above).

	Quarter			Operational Evaluation Value
	Results from Two Quarters Ago	Prior Quarter's Results	Current Quarter	
	A	B	C	$D = (A+B+(2*C))/4$
Date sample was collected	07-09-14	10-01-14	01-07-15	
TTHM (mg/L)	106.6	81.5	83.0	88.53
HAA5 (mg/L)	45.0	7.3	19.0	22.58

Note: The operational evaluation value is calculated by summing the two previous quarters of TTHM or HAA5 values plus twice the current quarter value, divided by four. If the value exceeds 0.080 mg/L for TTHM or 0.060 mg/L for HAA5, an OEL exceedance has occurred.

C. Has an OEL exceedance occurred at this location in the past? Yes No

If NO, proceed to item D. If YES, when did exceedance occur?

Was the cause determined for the previous exceedance(s)? Yes No

Are the previous evaluations/determinations applicable to the current OEL exceedance? Yes No

III. OPERATIONAL EVALUATION FINDINGS

A. Did the State allow you to limit the scope of the operational evaluation? Yes No
 If NO, proceed to item B. If YES, attach written correspondence from the State.

B. Did the distribution system cause or contribute to your OEL exceedance(s)? Yes No
 Possibly
 If NO, proceed to item C. If YES or POSSIBLY, explain (attach additional pages if necessary):
System hydraulic modeling indicates average residence times with detectable chlorine residuals surrounding location. The NBA source water quality helped contribute to the seasonally high result for January 2015. The quarter will remain through the next compliance reporting.

C. Did the treatment system cause or contribute to your OEL exceedance(s)? Yes No
 Possibly
 If NO, proceed to item D. If YES or POSSIBLY, explain (attach additional pages if necessary):

D. Did source water quality cause or contribute to your OEL exceedance(s)? Yes No
 Possibly
 If NO, proceed to item E. If YES or POSSIBLY, explain (attach additional pages if necessary):
Due to continuing, potential drought conditions, NBA water was maximized so as to preserve local reservoirs in addition to public conservation efforts. The NBA source water quality is organic-rich with above average TOC, UV and chlorine demand values with low seasonal distribution demands.

E. Attach all supporting operational or other data that support the determination of the cause(s) of your OEL exceedance(s).

F. If you are unable to determine the cause(s) of the OEL exceedance(s), list the steps that you can use to better identify the cause(s) in the future (attach additional pages if necessary):
We are currently comparing our hydraulic model and water quality data for verification.

G. List steps that could be considered to minimize future OEL exceedances (attach additional pages if necessary)

We are currently working to minimize future OEL exceedances through hydraulic modeling, additional water quality testing, storage tank improvements and treatment plant operations.

H. Total Number of Pages Submitted, Including Attachments and Checklists: _____

Operational Evaluation Reporting Form

ATTACHMENT B

I. GENERAL INFORMATION (Report is due within 90 days of OEL exceedance)

A. Facility Information

Facility Name: City of Napa PWSID: CA2810003
 Facility Address: PO Box 660
 City: Napa State: CA Zip: 94559

B. Report Prepared by:

(Print): Erin Kebbas Date prepared: 09-03-15
 (Signature): *Erin Kebbas*
 Contact Telephone Number: (707) 253-0822

II. MONITORING RESULTS

A. Provide the Compliance Monitoring Site(s) where the OEL was Exceeded.

3278 Stonebridge Court (2810003-012)

Note: The site name or number should correspond to a site in your Stage 2 DBPR compliance monitoring plan.

B. Monitoring Results for the Site(s) Identified in II.A (include duplicate pages if there was more than one exceedance)

1. Check TTHM or HAA5 to indicate which result caused the OEL exceedance. TTHM HAA5

2. Enter your results for TTHM or HAA5 (whichever you checked above).

	Quarter			Operational Evaluation Value
	Results from Two Quarters Ago	Prior Quarter's Results	Current Quarter	
	A	B	C	$D = (A+B+(2*C))/4$
Date sample was collected	01-07-15	04-01-15	07-21-15	
TTHM (mg/L)	105.3	77.5	80.0	85.70
HAA5 (mg/L)	59.0	14.0	38.0	37.25

Note: The operational evaluation value is calculated by summing the two previous quarters of TTHM or HAA5 values plus twice the current quarter value, divided by four. If the value exceeds 0.080 mg/L for TTHM or 0.060 mg/L for HAA5, an OEL exceedance has occurred.

C. Has an OEL exceedance occurred at this location in the past? Yes No

If NO, proceed to item D. If YES, when did exceedance occur? January 2014

Was the cause determined for the previous exceedance(s)? Yes No

Are the previous evaluations/determinations applicable to the current OEL exceedance? Yes No

III. OPERATIONAL EVALUATION FINDINGS

A. Did the State allow you to limit the scope of the operational evaluation? Yes No
 If NO, proceed to item B. If YES, attach written correspondence from the State.

B. Did the distribution system cause or contribute to your OEL exceedance(s)? Yes No
 Possibly
 If NO, proceed to item C. If YES or POSSIBLY, explain (attach additional pages if necessary):
System hydraulic modeling indicates high residence times with low chlorine residual surrounding location. The NBA source water quality helped contribute to the seasonally high result for January 2015. The quarter will remain through the next compliance reporting.

C. Did the treatment system cause or contribute to your OEL exceedance(s)? Yes No
 Possibly
 If NO, proceed to item D. If YES or POSSIBLY, explain (attach additional pages if necessary):

D. Did source water quality cause or contribute to your OEL exceedance(s)? Yes No
 Possibly
 If NO, proceed to item E. If YES or POSSIBLY, explain (attach additional pages if necessary):
Due to continuing, potential drought conditions, NBA water was maximized so as to preserve local reservoirs in addition to public conservation efforts. The NBA source water quality is organic-rich with above average TOC, UV and chlorine demand values with low seasonal distribution demands.

E. Attach all supporting operational or other data that support the determination of the cause(s) of your OEL exceedance(s).

F. If you are unable to determine the cause(s) of the OEL exceedance(s), list the steps that you can use to better identify the cause(s) in the future (attach additional pages if necessary):

We are continually comparing our hydraulic model and water quality data for verification.

G. List steps that could be considered to minimize future OEL exceedances (attach additional pages if necessary) and describe the timeline for these steps to be implemented.

We are currently working to minimize future OEL exceedances through hydraulic modeling, Additional water quality testing, storage tank improvements and treatment plant operations.

H. Total Number of Pages Submitted, Including Attachments and Checklists: _____

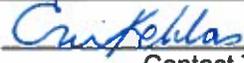
Operational Evaluation Reporting Form

I. GENERAL INFORMATION

A. Facility Information

Facility Name: City of Napa PWSID: CA2810003
 Facility Address: PO Box 660
 City: Napa State: CA Zip: 94559

B. Report Prepared by:

(Print): Erin Kebbas Date prepared: 09-03-15
 (Signature): 
 Contact Telephone Number: (707) 253-0822

II. MONITORING RESULTS

A. Provide the Compliance Monitoring Site(s) where the OEL was Exceeded.

1072 Darms Lane (2810003-024)

Note: The site name or number should correspond to a site in your Stage 2 DBPR compliance monitoring plan.

B. Monitoring Results for the Site(s) Identified in II.A (include duplicate pages if there was more than one exceedance)

1. Check TTHM or HAA5 to indicate which result caused the OEL exceedance. TTHM HAA5

2. Enter your results for TTHM or HAA5 (whichever you checked above).

	Quarter			Operational Evaluation Value
	Results from Two Quarters Ago	Prior Quarter's Results	Current Quarter	
	A	B	C	
Date sample was collected	01-07-15	04-01-15	07-21-15	$D = (A+B+(2*C))/4$
TTHM (mg/L)	104.6	93.7	90.0	94.58
HAA5 (mg/L)	52.0	9.7	20.0	25.43

Note: The operational evaluation value is calculated by summing the two previous quarters of TTHM or HAA5 values plus twice the current quarter value, divided by four. If the value exceeds 0.080 mg/L for TTHM or 0.060 mg/L for HAA5, an OEL exceedance has occurred.

C. Has an OEL exceedance occurred at this location in the past? Yes No

If NO, proceed to item D. If YES, when did exceedance occur? April 2105

Was the cause determined for the previous exceedance(s)? *potentially* Yes No

Are the previous evaluations/determinations applicable to the current OEL exceedance? Yes No

III. OPERATIONAL EVALUATION FINDINGS

A. Did the State allow you to limit the scope of the operational evaluation? Yes No
 If NO, proceed to item B. If YES, attach written correspondence from the State.

B. Did the distribution system cause or contribute to your OEL exceedance(s)? Yes No
 Possibly
 If NO, proceed to item C. If YES or POSSIBLY, explain (attach additional pages if necessary):
System hydraulic modeling indicates abnormally high residence times with detectable chlorine residuals surrounding location. Source water(s) are historically organic-rich, coupled with high residence times at a dead end location.

C. Did the treatment system cause or contribute to your OEL exceedance(s)? Yes No
 Possibly
 If NO, proceed to item D. If YES or POSSIBLY, explain (attach additional pages if necessary):

D. Did source water quality cause or contribute to your OEL exceedance(s)? Yes No
 Possibly
 If NO, proceed to item E. If YES or POSSIBLY, explain (attach additional pages if necessary):
Due to continuing, potential drought conditions, NBA water was maximized so as to preserve local reservoirs in addition to public conservation efforts. The NBA source water quality is organic-rich with above average TOC, UV and chlorine demand values with low seasonal distribution demands.

E. Attach all supporting operational or other data that support the determination of the cause(s) of your OEL exceedance(s).

F. If you are unable to determine the cause(s) of the OEL exceedance(s), list the steps that you can use to better identify the cause(s) in the future (attach additional pages if necessary):
We are continually comparing our hydraulic model and water quality data for verification.

G. List steps that could be considered to minimize future OEL exceedances (attach additional pages if necessary)
We are currently working to minimize future OEL exceedances through hydraulic modeling, additional water quality testing, storage tank improvements and treatment plant operations.

H. Total Number of Pages Submitted, including Attachments and Checklists: _____

Kebbas, Erin

From: Little, Amy@Waterboards <Amy.Little@waterboards.ca.gov>
Sent: Thursday, September 03, 2015 11:55 AM
To: Kebbas, Erin; Miller, Sheri@Waterboards
Cc: Eldredge, Joy; Janowski, Robert
Subject: RE: City of Napa Request for Limited OE Scope

Hi Erin,

We have considered your request and consider it approved for all four sites.

Sincerely,

Amy

Amy Little | Associate Sanitary Engineer | DDW - Mendocino District
State Water Resources Control Board | P: 707.576.2147 | F: 707.576.2722
50 D Street, Suite 200, Santa Rosa, CA 95404
Compliance. Assistance. Solutions.

From: Kebbas, Erin [<mailto:EKebbas@cityofnapa.org>]
Sent: Thursday, September 03, 2015 11:44 AM
To: Miller, Sheri@Waterboards
Cc: Little, Amy@Waterboards; Eldredge, Joy; Janowski, Robert
Subject: RE: City of Napa Request for Limited OE Scope

Sheri,

In compiling our July 2015 citation response, I realized I requested a limited scope of operational evaluation (OE) for the three sites in violation when the sites exceeding the OEL are: 770 Jackson Street, 2442 Allegheny Drive, 3278 Stonebridge Court and 1072 Darms Lane. I would like our request for a limited scope of OE to reflect the 4 sites in question. Please know 770 Jackson Street, 3278 Stonebridge Court and 1072 Darms Lane have previously submitted OEs.

I apologize for the error and thank you for your consideration.

Erin

Erin Kebbas

Water Quality Manager

Public Works Department, City of Napa

EIB Jamieson Canyon Water Treatment Plant

270 Kirkland Ranch Road, Napa, CA 94558

Mailing Address: PO Box 660, Napa, CA 94559-0660

Phone (707) 253-0822

Email ekebbas@cityofnapa.org

Website www.cityofnapa.org

Social www.facebook.com/CityOfNapa · <https://twitter.com/CityofNapa>



Visit our website for
up-to-date details on the drought
and ideas on how you can save water.

From: Kebbas, Erin
Sent: Monday, August 31, 2015 9:59 AM
To: 'Miller, Sheri@Waterboards'
Cc: 'Amy Little'; Eldredge, Joy; Janowski, Robert
Subject: City of Napa Request for Limited OE Scope

Sheri,

For the July 2015 sampling 770 Jackson Street (2810003-008), 2442 Alegheny Drive (2810003-011), and 4152 Browns Valley Road (2810003-028), exceeded the OEL. As there have been no changes to the distribution system, treatment plant or source water quality, the City of Napa would like to request a limited scope of the operational evaluation as stated in the Operational Evaluation Reporting Form, Part III. Operational Evaluation Findings, Section A.

Thank you for your consideration.

Erin

Erin Kebbas

Water Quality Manager

Public Works Department, City of Napa
EIB Jamieson Canyon Water Treatment Plant
270 Kirkland Ranch Road, Napa, CA 94558
Mailing Address: PO Box 660, Napa, CA 94559-0660
Phone (707) 253-0822
Email ekebbas@cityofnapa.org
Website www.cityofnapa.org
Social www.facebook.com/CityOfNapa · <https://twitter.com/CityofNapa>



Visit our website for
up-to-date details on the drought
and ideas on how you can save water.