



CITY OF BEVERLY HILLS
PUBLIC WORKS SERVICES DEPARTMENT
MEMORANDUM

TO: PUBLIC WORKS COMMISSION
FROM: Trish Rhay, Assistant Director of Public Works Services
DATE: July 7, 2014
SUBJECT: WATER OPERATIONS COMPLIANCE PLAN

On June 5, 2014, during our first quarterly meeting with the California Department of Public Health (CADPH), they notified us of two further unresolved violations. The following details these newly discovered violations.

2011-2013 – Citation Received 6/16/14. Staff failed to collect federally mandated Synthetic Organic Compounds (SOC) samples for the 2011-2013 monitoring cycle. This sampling is for untreated groundwater characterization purposes. The federal government identifies and tracks specific compounds in our groundwater to better forecast current or future water quality issues. CAPHD and the federal government have identified two SOC compounds in Beverly Hills groundwater that require monitoring. This is an every three-year-cycle requirement to take two consecutive quarter samples for these compounds at each well site. The required 2011-2013 samples were not collected.

Moving forward, the first quarter samples for the 2013-2015 cycle have already been collected and staff scheduled the second quarter sample to occur next month (July 2014). These two samples will reestablish our compliance with the requirements.

February 2012 – Citation. During routine well sampling in August 2011, the City reported an exceedance of the color water quality standard in Well #5 to CADPH. In response to this exceedance, the CADPH verbally requested quarterly color samples be collected at Well #5 beginning in September 2011. In December of 2012, the City of Beverly Hills received a Notice of Violation for failure to collect the quarterly samples as requested in August 2011. Subsequent to the Notice of Violation (NOV), staff again failed to comply with the sampling requirements.

Moving forward, staff initiated quarterly color sampling on Well #5 beginning in June 2014. Staff will continue to collect quarterly samples until further notified by CADPH.

Both of these violations require a Tier 3 public notification response and will be included in the 2013 Consumer Confidence Report (CCR). The required notification details are located in the CCR on TABLE 2: VIOLATION OF MONITORING AND REPORTING REQUIREMENT, Item #3 and #4. In isolation, these two violations should be considered serious. Combined with the prior violations the City has received, they validate my concern of a pervasive and critical management failure in our Water Division.

Significant and expedient action is required to break the cycle of non-compliance and send a strong message to our regulators and staff that our standard of operations must and will change.

Corrective Actions are detailed below:

A. Management Changes for Water Division

1. 06/19/2014: Current Chief Operator left City employment
2. 06/20/2014: Assign Water Quality Specialist as Distribution Chief Operator
3. 06/20/2014: Shut Treatment Plant until Interim Chief Operator can be hired
4. 06/20/2014: Initiate a recruitment for a permanent new Chief Operator
5. 07/03/2014: Complete review of all written communication with CADPH from 2010 to verify all commitments have been completed.
6. 07/03/2014: Hire an interim Chief Operator for coverage during hiring process
7. 07/14/2014: Hire third party Water Operations Expert to conduct audit
8. 09/01/2104: Implement recommendations from the third party audit

B. CADPH Requirements

1. 07/15/14: Submit Investigation Report
2. 10/15/14: Submit Comprehensive Water Quality Sampling Plan
3. 12/15/14: Complete and submit report on staff training on proper sampling compliance procedures