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GOVERNOR



MATTHEW RODRIGUEZ
SECRETARY FOR
ENVIRONMENTAL PROTECTION

State Water Resources Control Board
Division of Drinking Water

February 25, 2015

System No.: 1010007

Honorable Ashley Swearingin, Mayor
City of Fresno
2600 Fresno Street
Fresno CA 93721

RE: City of Fresno Groundwater Contamination Issues

Dear Honorable Mayor:

This is a follow up to our letter of November 7, 2014, regarding the City of Fresno's (City) proposed water plan to address groundwater contamination conditions that currently exist in the City's domestic water supply system.

The State Water Resources Control Board's (SWRCB) Division of Drinking Water (Division) is the lead agency in the State of California (State) dedicated to ensuring the supply, production and delivery of clean, potable water that complies with all of the applicable drinking water standards to the citizens of California. To monitor compliance with applicable drinking water regulations, the Division requires ongoing water quality monitoring and treatment at locations that don't produce water that complies with the drinking water standards. Regrettably, the City has a proliferation of contamination plumes in the City that compromises the City's groundwater pumping system and thereby threatens the public health and safety of the community. Ongoing water quality monitoring has revealed that the City has approximately 32 wells that exceed one or more drinking water standards. The City has installed wellhead treatment at 32 locations to remove the contamination from the water prior to it being delivered to the customers. The City submits monthly groundwater treatment plant reports for each of the treatment systems.

As we communicated in a letter dated November 7, 2014, the Division is working on the development of a regulation package which will include the proposal for a maximum contaminant level (MCL) to be established for 1,2,3-trichloropropane (1,2,3-TCP). Many of the City's groundwater wells produce water with a range of detections for 1,2,3-TCP. The Division has not published a draft MCL for 1,2,3-TCP but as many as 44 of the City's wells could be impacted by the adoption of an MCL for 1,2,3-TCP. Many of the wells that will be impacted are located in the southeast portion of the City. Wellhead treatment or replacement wells will have to be provided once an MCL is adopted. The City will be required to conduct initial monitoring for 1,2,3-TCP and a compliance determination will be made. The City will be issued a compliance order for any

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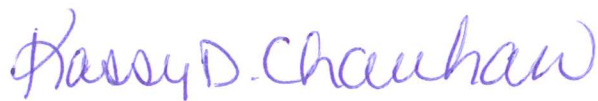
source that exceeds the MCL for 1,2,3-TCP, which will require a plan and time schedule for getting into compliance with the drinking water standard. The Division typically requires that the system be back in compliance within a three year period. It is anticipated that an MCL will be proposed and adopted before the end of 2015.

The Division is concerned about the City's ability to be able to meet domestic water supply demands in the southeast portion of the City given the number of wells that could be deemed to be out of compliance with the established MCL for 1,2,3-TCP. Fortunately, the City is in a unique position in that it has the ability to replace contaminated groundwater with surface water from the Sierra Nevada Mountains. This conjunctive use water resource management strategy will allow the City to remove wells from service that don't comply with all of the applicable drinking water standards and take efforts to either mitigate the contamination in the groundwater or plan accordingly for wellhead treatment.

We fully expect the City to continue its exemplary efforts to deliver clean, potable water to the community, despite the stressed groundwater conditions that exist. However, if the City fails to act to address any public health and safety risks that exist, such as providing water that doesn't comply with the drinking water standards, the Division will have to use their enforcement authority to ensure that corrective action is taken to protect the public health and safety of the community.

Please feel free to contact me at 559-447-3316, if you have any questions regarding the contents of this letter.

Sincerely,



Kassy D. Chauhan, P.E.
Senior Sanitary Engineer
Merced District
Central California Section
SOUTHERN CALIFORNIA BRANCH
DRINKING WATER FIELD OPERATIONS

cc: Fresno County Division of Environmental Health – Mr. Wayne Fox