



County of Santa Cruz Health Services Agency
Environmental Health Division

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<https://www.scceh.org/>

Drinking Water Regulatory Program

▶ Regulates Small Water Systems

▶ 38 State Small Water Systems:

▶ 5-14 residential connections

▶ Small Public water systems:

▶ 33 Community systems

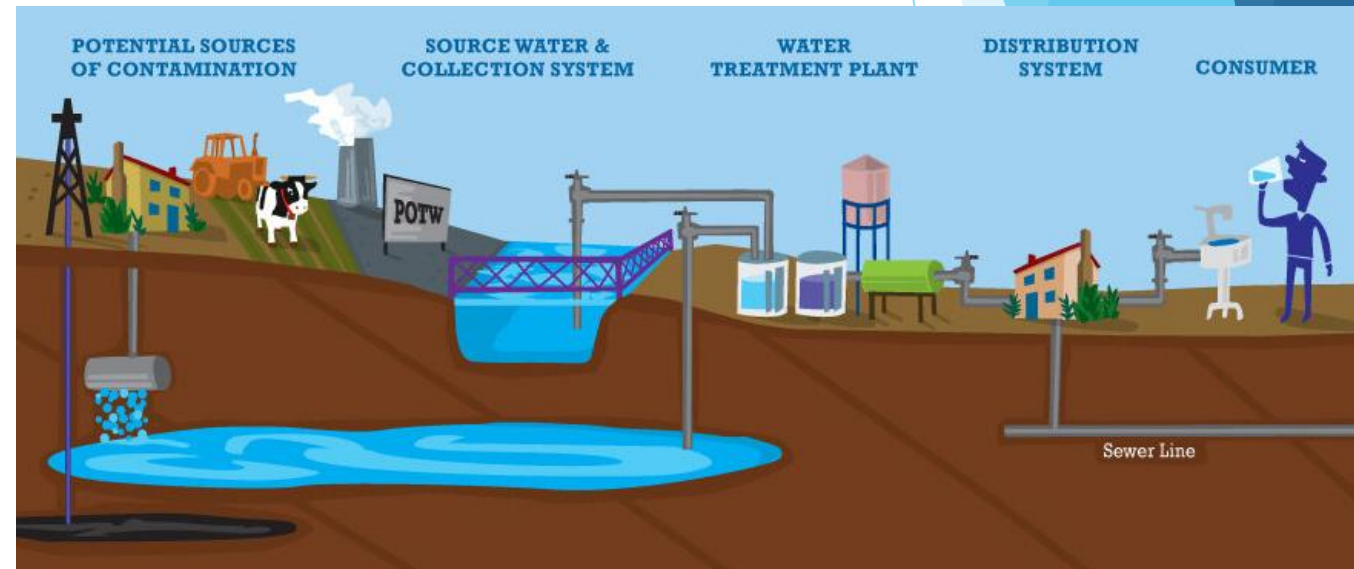
- ▶ 15+ residential connections or
- ▶ 25+ residents

▶ 12 Non-transient non-community systems

- ▶ Same people, do not live on-site, e.g.:
 - ▶ Schools
 - ▶ Office buildings

▶ 23 Transient non-community systems

- ▶ Different people on-site each day, e.g.:
 - ▶ Campgrounds
 - ▶ Retail stores



Source: Texas Commission on Environmental Quality www.swaptexas.org/learnmore

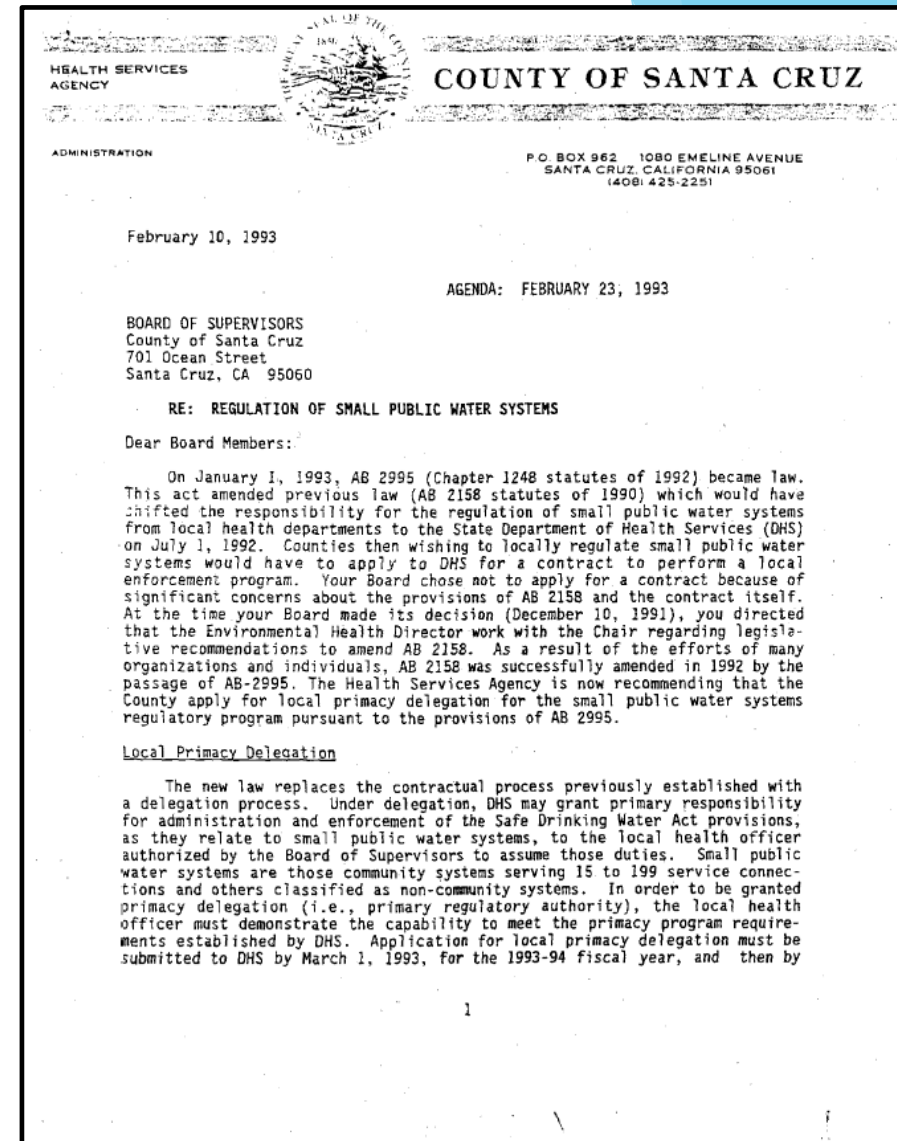
▶ Local Primacy Agency

- EPA is the primary agency tasked with enforcement of public water system regulations- it has “primacy”
- EPA has delegated this authority to most states to establish their own drinking water programs
 - Must include federal requirements
 - California Division of Drinking Water (DDW)
 - Under the State Water Resources Control Board (previously under CDPH)



▶ Local Primacy Agency

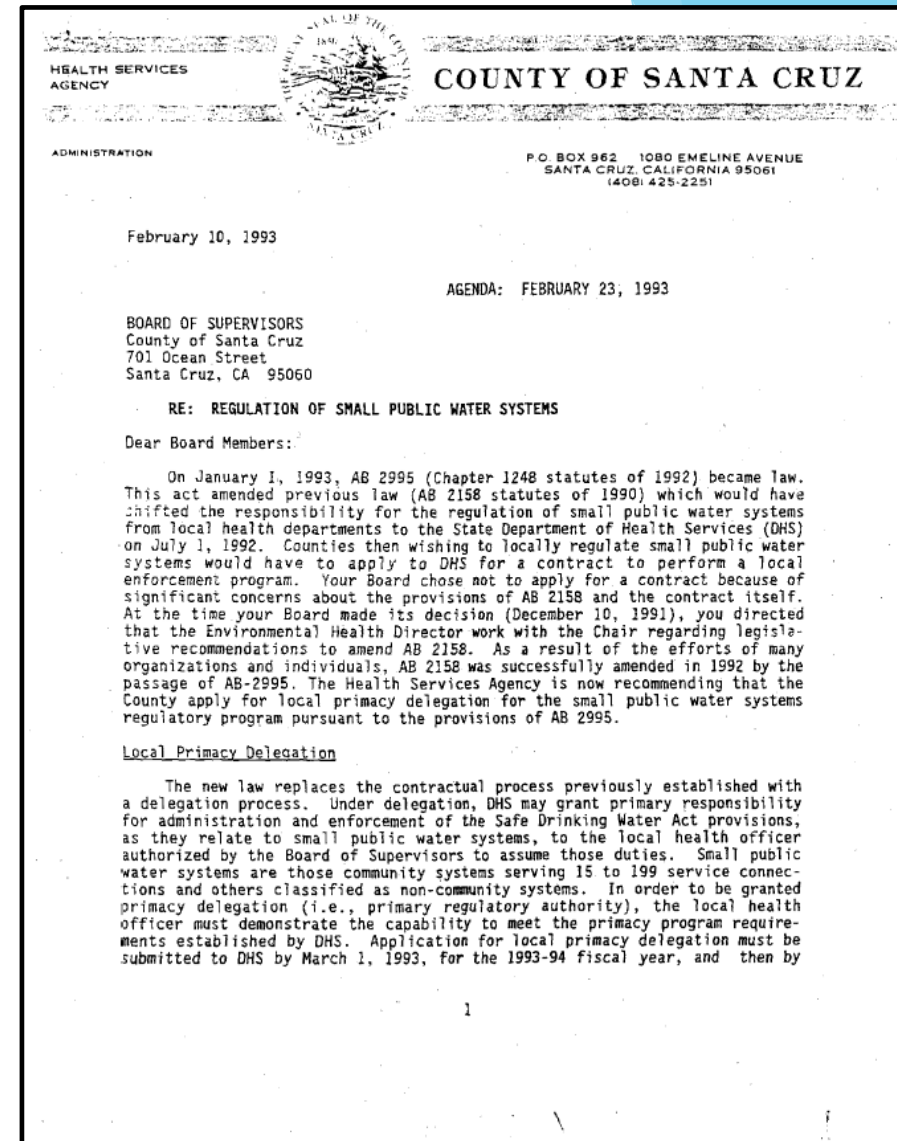
- 25 Counties have delegated authority from the State Water Board's Division of Drinking Water
- Historically (pre-1990), counties had oversight over small public water systems
- 1990-1992: Legislation set state as primacy agency, established primacy delegation system for counties



1993 Board Memo Recommending Application for Local Primacy

▶ Local Primacy Agency

- In 1994: \$514-\$837 annual permit fee
 - Adjusted for inflation (2025): \$1,139-\$1,855
 - Current permit fee range: \$1,151-\$3,543
- Rationale for local primacy included ability to provide small water systems with local oversight and improved cooperation with other County departments
 - Closest state office at the time was in Berkeley (California Department of Health Services)



1993 Board Memo Recommending Application for Local Primacy

▶ Water Quality Sampling Requirements

- Vary greatly by system type
- Minimum standards:
 - Safe level of Nitrate (acute contaminant)
 - Possible sources: agricultural contamination incl. fertilizer, septic systems and wastewater
 - Free from bacteria (Total Coliforms and *E.coli*)
- Quarterly or monthly test for bacteria
- Annual Nitrate sample (public water systems only)



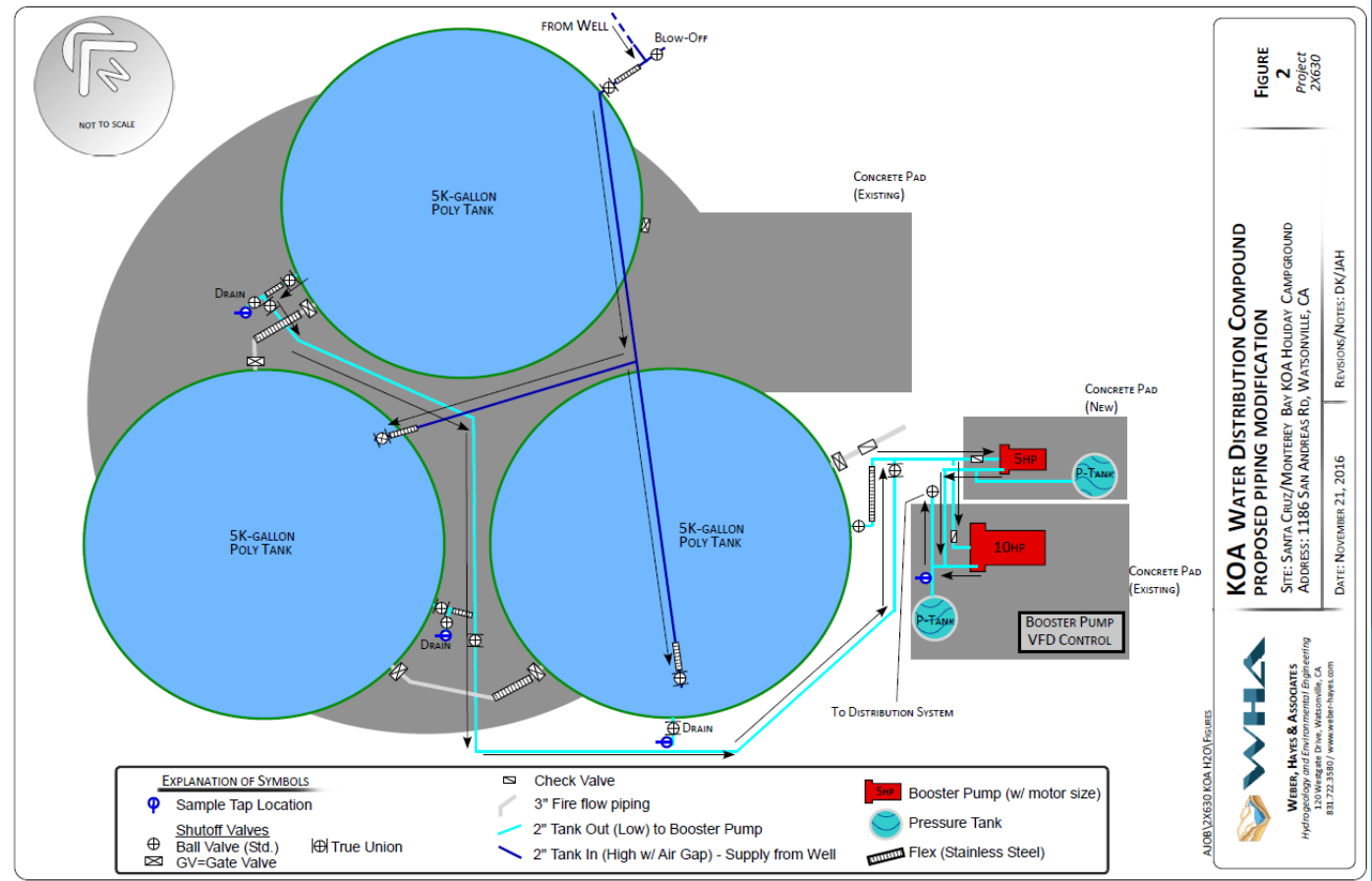
► Other Types of Required Sampling

- Inorganic Chemicals
- Organic Chemicals
 - Volatile Organics
 - Synthetic Organics
- Lead and Copper (Distribution System)
- General/Physical, e.g.:
 - pH
 - Conductivity
- Disinfection Byproducts
- Radiological- Radium, Gross Alpha Particle Activity



Plan Review

- Review plans and schematics related to water system construction projects to ensure compliance with requirements and avoid common pitfalls:
 - Water Works Standards (state regulations)
 - Materials used (pipe, valves, tanks, etc.)
 - Plumbing configuration-avoid potential water quality issues related to inadequate water turnover in storage, backflow concerns, and other factors
 - Structural stability



► Inspections

- Sanitary Surveys, including a site visit, are required on a regular basis for public water systems (every 3 or 5 years), and must include the following elements:
 - Water Sources
 - Treatment
 - Distribution system
 - Water Storage
 - Pumps and controls
 - Monitoring and reporting
 - System management and operation
 - Operator compliance
 - Resiliency & Preparedness (Community systems only)



► Enforcement

- As the Local Primacy Agency (LPA), the County is tasked with enforcement of federal, state, and local drinking water requirements
- Violations include failure comply with water quality standards, sampling and operational requirements, or reporting requirements
- Progressive enforcement approach- work with systems to resolve compliance issues and identify obstacles

Compliance Order No. [Compliance Order Number]

COIUNTY OF SANTA CRUZ
HEALTH SERVICES AGENCY
ENVIRONMENTAL HEALTH DIVISION

Name of Public Water System: [System Name]

Water System No: [System Number]

Attention: [Name, Title]

[Address]

[City, State Zip]

Issued: [Date-Issue]

COMPLIANCE ORDER FOR NONCOMPLIANCE
CALIFORNIA HEALTH AND SAFETY CODE, SECTION 116555 AND
CALIFORNIA CODE OF REGULATIONS, TITLE 22, SECTION 64431

NITRATE MAXIMUM CONTAMINANT LEVEL VIOLATION
[COMPLIANCE PERIOD YEAR]

► Upcoming and New Requirements

- Chromium-6
- Emerging Contaminants:
 - Perfluorinated compounds (PFAS)
 - Consumer products (nonstick cookware, waterproofing products)
 - Some firefighting foams
 - Very persistent in the environment
 - Manganese (as a health concern rather than an aesthetic contaminant)
 - Harmful Algal Blooms (HABs)



► CZU Fire

- Coordination with other agencies- Cal Fire, County Public Works, Water Districts, State Water Board, State Office of Emergency Services, and many others
- Impact to water systems:
 - Damaged/destroyed infrastructure
 - Contamination issues
 - Fire debris
 - Benzene, volatile chemicals



Thank You!