



REGION 9

SAN FRANCISCO, CA 94105

May 3, 2024

SENT VIA EMAIL ONLY

Jennifer Hodges
President, Havasu Water Company, Inc.
P.O. Box 1690
Havasu Lake, CA 92363
Email: havasuwater@outlook.com

Subject: Loss of Pressure at Havasu Water Company

Dear Jennifer Hodges,

On the morning of April 29, 2024, EPA became aware of a power outage that occurred at Havasu Landing last week on April 26, 2024, at roughly 3 PM PST. As a result of the outage, Havasu Water Company's (HWC) distribution system lost pressure and water service, and low pressure was also reported by customers once the water returned later that evening. HWC did not notify EPA of this incident, which is a serious concern because of the possible health implications of the loss of pressure. Please refer to the attached document titled "General Guide for Operators-Communicating with EPA", for a list of scenarios that require immediate notification to EPA (Enclosure 1).

Following a loss of pressure from a line break or power outage, backflow or backsiphonage may introduce contaminants into a water system. In cases where the pressure becomes very low or is lost completely, a Boil Water Notice must be distributed immediately and stay in effect until the system has flushed its lines and can verify there is no coliform bacteria in its distribution by sampling at all routine coliform sites, or other required steps as required by EPA. EPA has provided a BWN for HWC's use to circulate to customers if such a situation arises in the future (Enclosure 2).

In light of the recent loss of pressure incident and in preparation for the upcoming sanitary survey, scheduled for May 8, 2024, EPA reviewed the HWC's current coliform sampling plan. HWC currently takes its monthly routine coliform sample at only one site, the H.E.S Intake Valve, which is an inadequate representation of the distribution for monitoring considering the size of the system. It is advised that water systems have multiple routine coliform sites and

cycle through different ones each month to capture a holistic view of the distribution system. Per 40 C.F.R. § 141.853(a)(i), all systems must develop a written site sampling plan that identifies sampling sites and a sample collection schedule that is representative of the distribution system. Both the sampling plan and schedule are subject to EPA review and revision. Currently, HWC does not have a site sampling plan that is approved by the EPA. It is critical to create a revised site sample plan that rotates between 3-4 sites to not only assess the full system on a regular basis, but also if HWC were to have another outage, there will be established sites in place to conduct comprehensive coliform sampling.

It is also concerning that a loss of pressure and loss of water service occurred following a power outage of such short duration. Water systems must have a backup source of power available in case of emergencies to maintain an uninterrupted quality of water service. This is even more important for surface water systems, which are more vulnerable to contamination.

We hope that HWC will take seriously the risks of the recent low pressure and water outage event outlined in this letter alongside the outstanding significant deficiencies that were identified in EPA's January 30, 2024, letter (Enclosure 3) and fully address them as soon as possible to safeguard the health and safety of its customers.

If you have questions you can reach me at (415) 972-3969 or via email at rapicavoli.emmanuelle@epa.gov or Annie Wan, at (415) 972-3845 or at wan.hong@epa.gov. If you and your counsel have legal questions, please contact Alexa Engelman of our Office of Regional Counsel at (415) 972-3884 or at engelman.alexa@epa.gov.

Sincerely,

**EMMANUELLE
RAPICAVOLI**

Emmanuelle Rapicavoli, Manager
Tribal Drinking Water Section

Digitally signed by
EMMANUELLE RAPICAVOLI
Date: 2024.05.03 17:27:27 -0700'

Enclosures:

1. General Guide for Operators-Communicating with EPA
2. Loss of Pressure BWN Template
3. EPA letter to HWC 1.30.24

cc: SENT VIA EMAIL ONLY
Patrick Webb, Webb & Carey APC
Sean Chapin, Operator
Terence Shia, Director, Water Division, California Public Utilities Commission