



REGION 9

SAN FRANCISCO, CA 94105

August 6, 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: Recent Water Outages at Havasu Water Company

Dear Jennifer Hodges,

In the past two weeks, EPA has become aware of several incidents that have resulted in disruption to Havasu Water Company's (HWC) water service and planned contaminant sampling. EPA is providing you a summary of the incidents as well as required follow up for these situations going forward.

Summary of Incidents

July 19, 2024: On the morning of July 19, 2024, EPA was informed by customers of that they had no water service as of 8 AM. A customer reported seeing the fire hydrants being flushed and water pouring onto the streets while driving around the Havasu Landing area. Customers reported that water service was restored sometime before noon. EPA was not notified of the outage by HWC, but when EPA inquired into the situation, HWC stated the cause of the outage was a large air bubble in the distribution lines, but this could not be confirmed.

This day, July 19, 2024, was the scheduled date for the quarterly disinfectant byproduct (DBP) sampling, which is essential to monitor HWC's ongoing Total Trihalomethane (TTHMs) Maximum Contaminant Level (MCL) exceedance. During this visit, the sampler was able to confirm with HWC the location of the sampling site at 12300 Malamedia Road, which the system has contested several times after the EPA letter of May 17, 2024 (Enclosure 1).

However, because of the flushing of the system and lack of water pressure in the system before

the sample was taken, the samples taken that day are not considered valid for compliance as they do not represent the quality of water on a typical day. The extensive flushing would have decreased DBP levels significantly, leading to an underestimate of the typical levels in the water. While EPA is supportive of flushing as a method of controlling DBPs, flushing the day of a planned sample is not appropriate because it does not represent normal operating conditions of the system. EPA informed the system and lab that the samples would not be accepted for compliance prior to analysis to save the system the costs of analysis, however, we understand that HWC requested the lab process the samples for their own use. The resulting report shows that despite the extensive flushing, TTHM levels remained relatively high (above 70 ug/L). In the Administrative Order to the HWC issued on May 28, 2024, and in accordance with 40 C.F.R. § 141.625(c), HWC is required to maintain less than or equal to 60 ug/L TTHM for the locational running annual average (LRAA) for the system to be “consistently below the MCL” after it achieves initial compliance with the MCL by the end of the year.

The sampler is scheduled to visit again on August 9, 2024, to take another set of DBP samples.

July 30, 2024: HWC informed EPA it had a line break at Malamedia Road on the morning of July 30, 2024. EPA instructed HWC to distribute a precautionary Boil Water Notice (BWN) to all customers within 24 hours of the start of the outage. Customers informed EPA at around 5 PM that the water was back on, however no notices had been distributed to them. HWC responded to EPA on the following day, over 24 hours since the outage began, that the line was fixed and it was going to distribute notices. As it had been over 24 hours since the outage and service had already been restored, EPA deemed that distributing notices was too late and would possibly cause confusions for customers.

August 3, 2024: EPA received calls from customers on the morning of August 3, 2024 that HWC had a line break at Malamedia Road again. Customers reported that HWC did not shut the water off this time, and water flowed for over a day before a repair was made. EPA did not receive communication from HWC regarding this outage or the repair so EPA contacted HWC directly after receiving customer complaints.

Required Follow-Up for DBP Sampling

HWC must not take DBP samples for compliance until at least **5 days** have passed from the last flushing event. EPA requests the following information:

- Confirmation for the August 9th sampling event that no flushing has occurred since August 4th, 2024.
- HWC’s flushing plan and schedule for EPA review.

Required Follow-Up for Loss of Pressure

HWC must be prepared to distribute notices immediately in the event of another water line break or loss of pressure, and follow the below guidelines, in accordance with 40 CFR § 141.202.

- If there is a water line break or a loss of pressure (pressure <20 psi) in the distribution system, contact EPA immediately but no later than 24 hours after the incident.
 - If you can't get in touch with EPA in that time, issue a precautionary BWN immediately.
- Once you talk to EPA, if EPA requires a BWN to be issued, it must be distributed as soon as possible, but no later than 24 hours after the incident occurred (e.g. distribution must be completed within 24 hours of the line break).
- The BWN will remain in place until lifted by EPA. In order to have the BWN lifted, HWC will need to collect coliform results from multiple locations throughout the affected area as directed by EPA. All the samples must come back negative for total coliform bacteria for the BWN to be lifted.

HWC has not consistently contacted EPA when there is a loss of pressure or water line break and has not acted swiftly to distribute precautionary BWNs. These failures are violations of the regulatory requirements for public notice that can result in serious impacts to public health. If these incidents occur in the future, EPA expects HWC to follow the above protocol in a timely manner.

If you have questions you can reach me at (415) 972-3458 or via email at ho.karly@epa.gov or Annie Wan, at (415) 972-3845 or at wan.annie@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.alex@epa.gov.

Sincerely,

KARLY

FAUCONNIER-BANK

Karly Ho, Manager

Tribal Drinking Water Section

Digitally signed by KARLY
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Date: 2024.08.06 16:00:41
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Enclosures:

1. EPA letter to HWC re. DBP sites, dated May 17, 2024

cc:

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Sean Chapin, Utility Manager

Pat Hoban, Operator