

# SANITARY DEFICIENCY LIST

Pala Band of Mission Indians - Pala Annual Water Quality Report 2022  
Pala North PWS# 09-0605153  
Pala South PWS# 09-0600144



## **Significant Deficiencies**

*Sanitary deficiencies are defects in a water system's infrastructure, design, operation, maintenance, or management that cause, or may cause interruptions to the "multiple barrier" protection system and adversely affect the system's ability to produce safe and reliable drinking water in adequate quantities.*

*The following is a listing of significant deficiencies that had yet to be corrected by the end of 2022. Your public water system is still working to correct these deficiencies and interim milestones are shown, as applicable.*

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### **Lack of an Entry Point Sampling Tap**

Date Identified: 7/26/2022    Overall Due Date: 6/30/2023  
System: South

**Deficiency Description:** There is no entry point sampling tap at the Lilac Wells Plant building for sampling in accordance with the Monitor Schedule. Entry point samples are required for inorganics, nitrate, pesticides and SOCs, radionuclides, sodium, and VOCs. Failure to collect entry point samples at an appropriate entry point sample tap will result in monitoring violations.

**Corrective Action:** Install a smooth nose sample tap at a point on the header after treatment and before entering the distribution system. **CORRECTED**.

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### **Lack of Raw Water Sampling Tap**

Date Identified: 7/26/2022    Overall Due Date: 6/30/2023  
System: South

**Deficiency Description:** There is no raw water sampling tap on the well. A raw water sampling tap is required to comply with the requirements of the Ground Water Rule.

**Corrective Action:** A raw water sample tap (smooth-nosed) should be installed at or near the wellhead prior to any treatment. Under the Ground Water Rule (GWR), any total coliform positive sample in routine distribution sampling triggers raw water sampling to help determine if contamination is source related. Failure to collect a raw water sample after a routine coliform positive will result in a monitoring violation of the GWR. **CORRECTED**.

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### **Improper Backflow Prevention Assembly at Casino Service Connection**

Date Identified: 7/26/2022    Overall Due Date: 6/30/2023  
System: North

**Deficiency Description:** The existing 10-inch Double Check (DC) Backflow Prevention Assembly is not rated to protect against potential health hazard contaminants that exist at the Casino such as restaurants with soda carbonation at fountains, landscape irrigation, chillers and water conditioners. Additionally, the 1st port of the DC is being used as an irrigation hose connection, which compromises the integrity of the device.

**Corrective Action:** The DC should be replaced with a Reduced Pressure Principle (RP) Backflow Assembly. According to the Utility Manager, an RP has been ordered and will be scheduled for installation upon receipt. Prior to replacement of the DC, disconnect the garden hose from the assembly test port.

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### Lack of a Cross Connection Control Program (CCCP)

Date Identified: 7/26/2022 Overall Due Date: 6/30/2023

System: North

**Deficiency Description:** The PWS lacks a CCCP to monitor and manage the Casino backflow assemblies, the WWTP connection (with its Air Gap connection), water loading station and unprotected hose bibs at well houses.

**Corrective Action:** Develop and implement a CCCP to include surveying all potential cross connections, assessing the degree of hazards that exist, determining the appropriate backflow protection, maintaining a list of all devices, annual testing and a protocol for enforcing the program. A survey should be conducted by a certified cross connection control specialist in the development of the program. The Diagram and Attachment tab of this report has a list of existing backflow assemblies/locations provided by the Utility Manager which could be a start of planning the CCCP. **CORRECTED**.