GUAM ENVIRONMENTAL PROTECTION AGENCY • *AHENSIAN PRUTEKSIÓN LINA'LA' GUÅHAN*
LOURDES A. LEON GUERRERO • GOVERNOR OF GUAM | JOSHUA F. TENORIO • LIEUTENANT GOVERNOR OF GUAM
WALTER S. LEON GUERRERO • ADMINISTRATOR | MICHELLE C. R. LASTIMOZA • DEPUTY ADMINISTRATOR

Date: JUN 16 2022

Mr. Miguel C. Bordallo, P.E.
General Manager
Guam Waterworks Authority
Gloria B. Nelson Public Service Building
Mangilao, Guam 96913

RE: Compliance Order Achieved of the Guam EPA Safe Drinking Water Regulations
Guam Waterworks Authority (GWA) Central Water System
PWS ID# GU0000003

Hafa Adai Mr. Bordallo:

Pursuant to 10 Guam Code Annotated (GCA) Chapter 53, known as the Safe Drinking Water Act (SDWA), Guam Environmental Protection Agency is authorized to perform any and all acts necessary to fulfill the functions and requirements of the Act in order to promulgate and enforce the Guam Safe Drinking Water Regulations (GSDWR) covered under Guam Public Law No. 35-115 that shall apply to each Public Water Systems (PWSs) in Guam including those owned and operated by the Government of Guam and Federal Agencies.

Guam Environmental Protection Agency (Guam EPA) received GWA Central Water System's response letter to the Notice of Violation/Compliance Order dated May 27, 2022 of the following:

1. GWA Central Water System's Notice of Defense Form admitting to the accusation in whole received on May 27, 2022.
2. GWA Central Water System's Tier 1 notification that GWA notified its affected customers within 24 hours from the time and date of the MCL violation received on April 28, 2022.
3. GWA Central Water System's Tier 1 certification that GWA provided a copy of the notice to Guam EPA no later than 24 hours after providing the notification received on April 28, 2022.
4. GWA Central Water System's Level 2 Assessment Form and associated corrective actions within 30 days from the time and date of the MCL violation received on May 27, 2022.
5. GWA Central Water System's Level 2 Assessor Certification Application Form for Mr. Paul Kemp and Mr. Vincent Pangelinan received on May 27, 2022.

This submittal shall satisfy the Notice of Violation/Compliance Order that was issued to GWA Central Water System for E.coli MCL. Guam EPA Safe Drinking Water Program has determined

that GWA Central Water System has achieved the NOV/Compliance Order and has returned to compliance effective June 07, 2022.

If you have any questions regarding this letter, please contact Ms. Juliana Mendoza, Environmental Health Specialist II at (671) 300-9026 or our Chief Engineer CAPT. Brian Bearden, PE. BCEE at (671) 300-4779.

Si Yu'us Ma'ase,

WALTER S. LEON GUERRERO
Administrator

Cc: Ms. Corine Li, USEPA Region 9
Mr. Jacob Jenzen, USEPA Region 9
Mr. Everett Pringle, USEPA Region 9 Enforcement and Compliance Assurance Division
Attorney General Office

22-0861
received
5/29/22 3:19

GUAM WATERWORKS AUTHORITY

"Better Water. Better Lives."
Gloria B. Nelson Public Service Building | 688 Route 15, Mangilao, Guam 96913
P.O. Box 3010, Hagatna, Guam 96932

May 27, 2022

Memorandum

To: Administrator, Guam Environmental Protection Agency (GEPA)

Via: Chief Engineer, Guam Environmental Protection Agency (GEPA)

From: General Manager, Guam Waterworks Authority (GWA)

Subject: Notice of Violation/Compliance Order
Guam Waterworks Authority Central System
PWS ID#: GU0000003

Hafa Adai Mr. Leon Guerrero:

On April 29, 2022, GWA received the Notice of Violation/Compliance Order as a result of a positive E. coli (EC) MCL Violation for Agat-GHURA Southwest Site Base Office. GWA is transmitting herein in response to the NOV the Revised Total Coliform Rule (RTCR) Level 2 Assessment Form, Notice of Defense, and the RTCR Level 2 Assessor Certification Application signed by the O&M Manger for Water Distribution as well as the Assistant General Manager for Compliance and Safety. The following is GWA's understanding of the general chronology of events regarding the matter.

On April 27, GWA Lab routine distribution system sampling resulted in four TC positive samples, two of which tested EC positive, in Agat. GEPA was promptly notified and resamples were taken from each positive site, including the upstream and downstream locations.

On April 28, GWA promptly informed GEPA of one positive TC result from the resampling of Agat- GHURA Southwest Site Base Office, which was one of two E. coli positive on the routine sampling. As required, GWA issued a Boil Water Notice (BWN) on April 28, 2022 to the affected area and posted at the Agat Mayor's Office. GEPA team joined GWA team on another resampling at this TC positive site, along with the upstream and downstream locations.

On April 29, 2022, the resample resulted negative for TC and a BWN cancellation was issued, but the posted BWN remained for 7 days. GWA continued to conduct in-dept assessment to identify the potential sources of contamination from April 28 to May 13, 2022.

GWA assessment included inspection of customers who recorded any reverse flow, lack a backflow preventer on agricultural meter, and areas where customers made complaints of smelling foul odor. Although there were some customers that did not have a backflow preventer (BFF) installed, the level of hazard was not deemed high, however a Notice to Comply was issued and the customers were instructed to install a BFF as soon as possible. GWA did not observe anything of significance that can be identified as the cause of the contamination.

After reviewing a chronology of events that occurred prior to and after the positive results and the review of the water distribution system in the service area, GWA has concluded that the potential cause of the positive results was due to a main water line break that occurred which caused fluctuation in the pressure in the system in the Sinifa service area that has the capacity to flow into the Agat service area and introduce contaminants in the system.

GWA reacted responsively to this event. Preventative measures and corrective action were taken immediately to include repeat sampling, increase flushing of the Agat area, distribution of the Boil Water Notice to Mayor's office and affected residents, and subsequent sampling to confirm the system was clear.

To mitigate this situation from occurring in the future, GWA will increase the amount of flushing in the area after a main waterline break, issue a precautionary BWN to affected areas, make efforts to keep the pressure above the minimum requirements of above 20 psi, and continue pipe replacement and other critical water system upgrades.

If you have any questions or comments, please feel free to contact Mr. Vince Pangelinan at vpangelinan@guamwaterworks.org or Mr. Thomas Cruz at thomas@guamwaterworks.org.

Sincerely,

Thomas A. Cruz, P.E.
Acting - General Manager

Cc: Paul Kemp, AGM Compliance and Safety
Vincent Pangelinan, O&M Manger Water Distribution
Ray Quintanilla, O&M Manager Water Production
Jennifer Cruz, GWA Laboratory Administrator

Attachments:
Notice of Defense
Revise Total Coliform Rule (RTCR) Level 2 Assessment Form
RTCR Level 2 Assessor Certification Application – Vince Pangelinan
RTCR Level 2 Assessor Certification Application – Paul Kemp

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GUAM EPA CASE#_____

NOTICE OF DEFENSE

I, MIGUEL C. BORDALLO, GWA GENERAL MANAGER, have received your Notice of Violations and/or Order of Compliance, dated April 29, 2022, charging me for violations, and I wish to:

(Please check appropriate sections)

[ ] A. Request for a hearing and

[ ] 1. Object to the accusation on the ground that it does not state acts or omissions upon which the Agency can proceed.

[ ] 2. Object to the form of accusation on the ground that it is so indefinite or ambiguous that I cannot identify the infraction or prepare my defense.

[ ] 3. Wish to prepare new matter in my defense.

[ ] 4. Admit to the accusation in part.

[x] B. Admit the accusation in whole.

My mailing address is: PO BOX 3010, HAGATNA, GU 96932

Signature: [signature]

Date: 5-27-2022

GUAM ENVIRONMENTAL PROTECTION AGENCY

Revised Total Coliform Rule (RTCR) Level 2 Assessment Form

PWS ID#: GU0000003 PWS Name: Central System

Primary Operator (print name): Vincent Pangelinan
Assessment trigger date: 4/28/2022
SEASONAL: YES ☐ NO ☒

Phone: 671-300-6343
Date Assessment Completed: 5/27/2022
Reason for Assessment: NOV/Compliance Order

Assessment Elements	Issues? Y	N	N/A	Issue Description	Corrective Action Taken or Planned to be Taken and Date
1. Review of the sample sites				**Indicate Element number being described.**	
1.1 Was the sample taken at the routine coliform site?	X				
1.2 Was the tap area unsanitary at the time of sampling?		X			
1.3 Was this sample taken from an outside faucet?	X				
1.4 Was the sample taken from a swivel tap?		X			
1.5 Did the tap have a point of use treatment device on it?		X			
1.6 Does the building where the sample was taken have a point of entry device?		X			
1.7 Has this location undergone any plumbing replacements or repairs?			X		
1.8 Are there any possible cross connections around the sample site (including yard hydrants and stock tanks)?		X			
1.9 Is this location near a storage tank or dead end?	X			1.9 Location is at a dead end	
1.10. Any other sample site issues not previously mentioned?		X			
2. Review of sample protocol					
2.1 Is the sampler a regular, trained sampler?	X				
2.2 Was a laboratory-provided TC sample bottle used?	X				
2.3 Was the aerator removed?			X		
2.4 Was the water tap flushed for at least 5 minutes?	X				
2.5 Was the tap disinfected or flamed?	X				
2.6 Did the sample get too warm prior to being placed on ice?		X			
2.7 Was there other sampler error? Describe		X			
2.8 If it is a seasonal system, were there any problems during the most recent start-up procedure?			X		
2.9 Any other sample protocol issues not previously mentioned?		X			
3. Review of the distribution system.					
3.1 Have any mains been recently replaced or service lines recently added?					
3.2 Have fire hydrants or blow offs been recently flushed?					

GUAM ENVIRONMENTAL PROTECTION AGENCY

Revised Total Coliform Rule (RTCR) Level 2 Assessment Form

Assessment Elements	Issues? Y	Issues? N	Issues? N/A	Issue Description	Corrective Action Taken or Planned to be Taken and Date
3.3 Have valves been recently exercised to direct flow?	☐	☐	☐	3.4 4/21/22 Joaquin Perez Road – Repairs made on the service lateral off of the main line. Water outage was required. 4/22/22 Chalan Kindo St. – 2" line leak repaired, crew installed a 2" valve under pressure and replaced fittings downstream of valve. Only the houses on that street were affected.	
3.4 Any leaks or main breaks noted?	☒	☐	☐		
3.5 Are all of the backflow prevention devices operational and maintained?	☐	☐	☐		
3.6 Was there a total loss of pressure, low pressure (<20 psi) or changes in water pressure? If yes, when?	☒	☐	☐	3.5 Pressure during water outage was below 20 psi.	
3.7 Any areas of the distribution with low disinfectant levels (<0.2 mg/L)?	☐	☐	☐		
3.8 Any recent pump station failures or repairs?	☐	☐	☐		
3.9 Air relief valve leaking?	☐	☐	☐	3.10 Standing water in altitude valve vault	
3.10 Standing water or debris in valve vault?	☐	☐	☐		
3.11 Any recent power loss?	☐	☐	☐		
3.12 Any unprotected cross connections (including yard hydrants and stock tanks)?	☐	☐	☐		
3.13 Any other distribution issue not previously mentioned?	☐	☐	☐		
4. Review of storage tank(s) (Note the specific facility if any issues are found)					
4.1 Is there a presence of animals or insects in the tank(s)?	☐	☐	☐		
4.2 Are there breaches or holes of any sort into tank(s)?	☐	☐	☐	4.2 Santa Rita Springs - gap is located between roof and wall where metal beams sit on.	4.2 Cover installed between the gap and the wall.
4.3 Is there any presence of animal droppings around openings, vents or overflows?	☐	☐	☐		
4.4 Is there sediment buildup and floating debris in tank(s)?	☐	☐	☐		
4.5 Have the tank(s) been cleaned within the last 5 years? If not, list when it was last cleaned.	☐	☐	☐	4.5 Santa Rita Springs was last cleaned in 2018 when the cover was replaced.	
4.6 Is there a #24 mesh screen installed on vents and overflows?	☐	☐	☐		
4.7 Is the #24 mesh screen damaged or not properly installed?	☐	☐	☐	4.7 Santa Rita Springs installation of #24 mesh screen completed.	
4.8 Is the overflow pipe directly connected to a tank drain, sanitary sewer or storm drain?	☐	☐	☐		
4.9 Does the hatch have a solid, water proof, shoebox type lid that is properly sealed?	☐	☐	☐	4.9 Santa Rita Springs has properly sealed hatch.	
4.10 Was the hatch locked or secured?	☐	☐	☐	4.10 Hatch at Santa Rita Springs was secured.	
4.11 Has the tank been accidently drained?	☐	☐	☐		
4.12 Have there been high flows through the tank?	☐	☐	☐		
4.13 Was there high water age in the tank (infrequent water use)?	☐	☐	☐		
4.14 Was the sample taken when the tank was at the low level mark?	☐	☐	☐		

GUAM ENVIRONMENTAL PROTECTION AGENCY

Revised Total Coliform Rule (RTCR) Level 2 Assessment Form

Assessment Elements	Issues? Y	Issues? N	Issues? N/A	Issue Description	Corrective Action Taken or Planned to be Taken and Date
4.15 Failure or improper operation on tank telemetry/altitude valves/controls?	☐	☐	☐		
4.16 Any recent repairs on the tank(s)?	☐	☐	☐		
4.17 Was there any power loss?	☐	☐	☐		
4.18 Was the tank vandalized or subject to tampering?	☐	☐	☐		
4.19 Any other storage tank issues not previously mentioned above?	☒	☐	☐	4.19 4/26/ 22 .Santa Ann area outage during the replacement valve at the Santa Ana tank.	4.19 During restoration fire hydrants were open to bleed and flush the lines .
5. Review of treatment process (If applicable)					
5.1 Has the treatment been bypassed altogether at any time or have individual processes been interrupted by power outages or other causes? If yes, provide details on when, which processes and for how long?	☐	☐	☒		
5.2 Have there been any new treatment processes added or new equipment installed?	☐	☒	☐		
5.3 Have there been any recent repairs of major unit processes or treatment equipment?	☐	☒	☐		
5.4 Have there been any changes in the operational procedures used for treating the water such as, changes in chemical dosages or changes in coagulant chemicals used? If yes, provide details of the change and when it occurred.	☐	☒	☐		
5.5 Has a coagulant been added at all times the plant has been filtering water?	☐	☐	☒		
5.6 Have there been changes in raw water quality?	☐	☒	☐		
5.7 Was the finished water turbidity increasing?	☐	☒	☐		
5.8 Have filter clogging algae caused more frequent backwashing?	☐	☐	☒		
5.9 Has a disinfectant been added at all times or have there been any failures in adding disinfectant for any length of time?	☐	☒	☐		
5.10 Has there been any vandalism or tampering at the plant?	☐	☒	☐		
5.11 Any other treatment plant issues not previously mentioned above?					
6. Sources – Well(s) (Note the specific facility if any issues are found)					
6.1 Is the sanitary seal intact?	☐	☐	☒		
6.2 Is the well cap defective or damaged or not water tight?	☐	☐	☒		
6.3 Does the vent have a #24 mesh screen?	☐	☐	☒		
6.4 Is the vent screen damaged or not installed properly?	☐	☐	☒		

GUAM ENVIRONMENTAL PROTECTION AGENCY

Revised Total Coliform Rule (RTCR) Level 2 Assessment Form

Assessment Elements	Issues? Y	Issues? N	Issues? N/A	Issue Description	Corrective Action Taken or Planned to be Taken and Date
6.5 Does the vent and pump to waste terminate in an air gap of at least three pipe diameters above the ground?	☐	☐	☒		
6.6 How is the well used? (Circle if applicable)	☐	☐		Primary Backup Emergency	
6.7 Are there any unprotected cross connections at the wellhead? Are there any unprotected openings in the pump or pump assembly?	☐	☐	☒		
6.8 Is the pitless adapter damaged?	☐	☐	☒		
6.9 Is there a missing or damaged grout seal?	☐	☐	☒		
6.10 Has there been any recent work performed on the pump?	☐	☐	☒		
6.11 Is the wellhead secured to prevent unauthorized access?	☐	☐	☒		
6.12 Have there been any sewer spills, source water spills or other disturbances near the well?	☐	☐	☒		
6.13 Is the well pit in standing water or evidence of flooding?	☐	☐	☒		
6.14 Any other well issues not previously mentioned above?	☐	☐	☒		
Sources- Spring(s) (Note the specific facility if any issues are found)					
6.15 Is there evidence of flooding or infiltration of surface water runoff around the spring?	☐	☒	☐		
6.16 Is the spring box improperly developed or poorly maintained?	☐	☒	☐		
6.17 Are there dead animals near the spring?	☐	☒	☐		
6.18 Any other issues about springs not previously mentioned above?	☐	☒	☐		
Sources-purchased water					
6.19 Water quality issues with supplier?	☐	☒	☐		
6.20 Low disinfectant residual from supplier (typically ≤0.02 mg/L)?	☐	☒	☐		
6.21 Any other purchased water issues not previously mentioned above?	☐	☒	☐		
Applicable to all sources					
6.22 Has an unapproved source been used?	☐	☒	☐		
6.23 Has there been a change in sources?	☐	☒	☐		
6.24 Has there been recent rapid snowmelt, heavy rainfall or flooding?	☐	☒	☐		
6.25 Any evidence of animals near the source?	☐	☒	☐		
6.26 Have there been algae blooms?	☐	☒	☐		

GUAM ENVIRONMENTAL PROTECTION AGENCY

Revised Total Coliform Rule (RTCR) Level 2 Assessment Form

Assessment Elements	Issues? Y	N	N/A	Issue Description	Corrective Action Taken or Planned to be Taken and Date
6.27 Is the source water sample for ground water systems E. coli positive? This may indicate that the positive sample is originating from the source and may be a continuous source of contamination.	☐	☒	☐		
6.28 Any other source issues not previously mentioned above?	☐	☒	☐		
7. Significant Deficiencies					
7.1 Are there any unaddressed significant deficiencies? This may indicate that the problem is known and is in the process of being remedied. Include approved corrective action date and status of each corrective action.	☐	☐	☐	7.1 item 4.2 gap between roof and concrete wall.	7.1 Gap between cover and wall completed 5-26-22.

Additional Comments:
GWA conducted field inspection and assessment from April 28 to May 13, 2022 to determine the potential cause of the positive TC/ E.coli results. GWA conducted inspection of customers who recorded any reverse flow, lack a backflow preventers on agricultural meter, and areas where customers made complaints of smelling foul odor. GWA did not observe anything of significance that can be identified as the cause of the contamination. After reviewing a chronology of events that occurred prior to and after the positive results and the review of the water distribution system in the service area, GWA has concluded that the potential cause of the positive result was due to a main water line break that occurred which caused fluctuation to the pressure in the system in the Sinifa service area which has the capacity to flow into the Agat service area and introduce contaminates into the system. Preventative and corrective action were taken immediately to included repeat sampling, increase flushing of the Agat area, distribution of the Boil Water Notice to Mayor's office and affected residents, and subsequent sampling to confirm that the system was clear. To ensure this does not happen again, GWA will increase the amount of flushing in the area after a main waterline break, issue a precautionary BWN to affected areas, make efforts to keep the pressure above the minimum requirements of above 20 psi, continue pipe replacement and other critical water system upgrades and ensure agricultural customers have backflow preventers installed.

Name of Assessor completing the form (PRINTED): VINCENT E.C. PANGELINAN
Signature: [signature] **Date:** 5/27/22
Water system responsible party (PRINTED): VINCENT E.C. PANGELINAN
Signature: [signature] **Date:** 5/27/22

Reserved for GUAM EPA Review

	Yes	No	Comments
1. Has assessment been successfully completed?	☐	☐	
2. Likely reason for EC+ occurrence has been found.	☐	☐	
3. System has corrected the problem.	☐	☐	
4. Corrective Action Approved?	☐	☐	

GUAM ENVIRONMENTAL PROTECTION AGENCY
RTCR LEVEL 2 ASSESSOR CERTIFICATION APPLICATION (V.1 DEC 2021)

Applicant Information			
Last Name:	Pangelinan	First Name:	Vincent
Address:	Suite 200, 688 Rt.15, Mangilao, GU 96913-6203		
Water Purveyor:	Guam Waterworks Authority	PWS ID: GU 0000003	
Water System Name:	Central Distribution		
Certification Type:	WD IV	Expiration date:	February 6, 2023
Certification Type:		Expiration date:	
Certification Type:		Expiration date:	
Certification Type:		Expiration date:	

Work Experience Summary				
Water Purveyor	Job Title	From (month/year)	To (month/year)	Duration (yrs/months)
GWA	O&M Manager	September 2015	Present	6 years 8 months

If you have worked on more than one system, list the systems. Each job listed in the summary requires a separate Work Experience Record. If you need additional Work Experience Record sheets, please duplicate the 2nd page. Resumes or job descriptions will be considered optional information and will not substitute for the Work Experience Record.

Work Experience Record

Work Experience (summarize your experience in your own words):

Oversee and manage daily operations for the central distribution system. Assign task and assignments to maintenance teams and operators. Ensure all facilities and distribution system are working properly. Address any issues that affect the distribution system and make necessary adjustments to continue delivery of service.

Water System Description (indicate type of treatments, for example, chlorination, granular activated carbon filtration): .

Water distribution system.

X	I understand the objectives and structure of the RTCR.
X	I understand the nature of coliforms and E. coli, and bacteriological sampling.
X	I have a working knowledge of water system operation.
X	I have a working knowledge of treatment operations.
X	I have a working knowledge of distribution system operations.

Certification: I certify that I am the person authorized to fill out this form, and the information contained herein is true, accurate and complete to the best of my knowledge and belief.

Print Name:	Vincent Pangelinan	Title:	O&M Manager
Signature:		Date:	5-13-22
Phone #:	671-898-4851	Email:	vpangelinan@guamwaterworks.org

Work Experience Record				
Water Purveyor	Job Title	From (month/year)	To (month/year)	Duration (yrs/months)
Work Experience (summarize your experience in your own words):				
Water System Description (indicate type of treatments, for example, chlorination, granular activated carbon filtration):				

Work Experience Record				
Water Purveyor	Job Title	From (month/year)	To (month/year)	Duration (yrs/months)
Work Experience (summarize your experience in your own words):				
Water System Description (indicate type of treatments, for example, chlorination, granular activated carbon filtration):				

Please return this form to the SDWP at:

Guam Environmental Protection Agency
3304 Mariner Avenue #17, Barrigada, Guam 96913

For additional questions, please contact the SDWP at 671-300-4751/4752.

GUAM ENVIRONMENTAL PROTECTION AGENCY
RTCR LEVEL 2 ASSESSOR CERTIFICATION APPLICATION (V.1 DEC 2021)

Applicant Information			
Last Name:	Kemp	First Name:	Paul
Address:	Suite 200, 688 Rt.15, Mangilao, GU 96913-6203		
Water Purveyor:	GWA	PWS ID:	GU0000003
Water System Name:	Central System		
Certification Type:	WWT-4 (S4-519)	Expiration date:	12/20/2023
Certification Type:	WD-4 (D4-540)	Expiration date:	12/20/2023
Certification Type:	WT4(T4-552)	Expiration date:	05/07/2023
Certification Type:	WWC-4 (C4-556)	Expiration date:	06/14/2024

Work Experience Summary

Water Purveyor	Job Title	From (month/year)	To (month/year)	Duration (yrs/months)
Deep Springs College	Water Treatment plant Operator	09/01/1960	08/31/2062	2/0
Guam Waterwpeks Authority	AGM-C&S	03/01/2023	Current	18/10

If you have worked on more than one system, list the systems. Each job listed in the summary requires a separate Work Experience Record. If you need additional Work Experience Record sheets, please duplicate the 2nd page. Resumes or job descriptions will be considered optional information and will not substitute for the Work Experience Record.

Work Experience Record

Work Experience (summarize your experience in your own words):

61 years of water quality, water analysis and water treatment experience. Experience in industrial, as well as Potable water as well as in wastewater.

Water System Description (indicate type of treatments, for example, chlorination, granular activated carbon filtration):

GWA Central System, (GU0000003) is a blended water system using purchased water from the Navy's Fena Surface water system and ground water from the GWA Northern System (GU0000006). Both sources are disinfected with chlorine. The Navy system is certified to meet the LT2ESWTR.

X	I understand the objectives and structure of the RTCR.
X	I understand the nature of coliforms and E. coli, and bacteriological sampling.
X	I have a working knowledge of water system operation.
X	I have a working knowledge of treatment operations.
X	I have a working knowledge of distribution system operations.

Certification: I certify that I am the person authorized to fill out this form, and the information contained herein is true, accurate and complete to the best of my knowledge and belief.

Print Name:	Paul J. Kemp	Title:	Assistant General Manager - Compliance and Safety
Signature:		Date:	05/26/2022
Phone #:	671 300 6995	Email:	paulkemp@guamwaterworks.org

Work Experience Record				
Water Purveyor	Job Title	From (month/year)	To (month/year)	Duration (yrs/months)
GWA	AGM-C&S	03/01/2003	Current	18/10

Work Experience (summarize your experience in your own words):

Primary oversight of all GWA water quality; managing compliance with the SDWA, CWA and CAA; including the oversight of the GWA Ugum SWTP meeting LT2ESWTR. Continuous management adjustment as the federal and Guam regulations evolve. Working closely with the Guam EPA to optimize communiation and adjust compliance to keep up with new knowledge/rules.

Water System Description (indicate type of treatments, for example, chlorination, granular activated carbon filtration):

GWA has 3 potable water systems:
Northern (GU0000006) deep well water, disinfected with chlorine at every point of entry.
Central (GU0000003) a blend of GWA Northern deepwell water and Navy Fena Surface Water, both disinfected with chlorine, Fena water certified to SDWA LT2ESWTR quality.
Southern (GU0000001) fed by the Ugum Surface Water Treatment Plant a continuous microfiltration (CMF) Memcor plant with preconditioning of the water before the membranes to control TOC for DBP reduction, and final disinfection with chlorine.

Work Experience Record				
Water Purveyor	Job Title	From (month/year)	To (month/year)	Duration (yrs/months)

Work Experience (summarize your experience in your own words):

Water System Description (indicate type of treatments, for example, chlorination, granular activated carbon filtration):

Please return this form to the SDWP at:

Guam Environmental Protection Agency
3304 Mariner Avenue #17, Barrigada, Guam 96913

For additional questions, please contact the SDWP at 671-300-4751/4752.

GUAM ENVIRONMENTAL PROTECTION AGENCY

Revised Total Coliform Rule (RTCR) Level 2 Assessment Form

PWS ID#: GU0000003 PWS Name: Central System

Primary Operator (print name): Vincent Pangelinan
Assessment trigger date: 4/28/2022
SEASONAL: YES ☐ NO ☒

Phone: 671-300-6343
Date Assessment Completed: 5/27/2022
Reason for Assessment: NOV/Compliance Order

Assessment Elements	Issues? Y	N	N/A	Issue Description	Corrective Action Taken or Planned to be Taken and Date
1. Review of the sample sites				**Indicate Element number being described.**	
1.1 Was the sample taken at the routine coliform site?	X				
1.2 Was the tap area unsanitary at the time of sampling?		X			
1.3 Was this sample taken from an outside faucet?	X				
1.4 Was the sample taken from a swivel tap?		X			
1.5 Did the tap have a point of use treatment device on it?		X			
1.6 Does the building where the sample was taken have a point of entry device?		X			
1.7 Has this location undergone any plumbing replacements or repairs?			X		
1.8 Are there any possible cross connections around the sample site (including yard hydrants and stock tanks)?		X			
1.9 Is this location near a storage tank or dead end?	X			1.9 Location is at a dead end	
1.10. Any other sample site issues not previously mentioned?		X			
2. Review of sample protocol					
2.1 Is the sampler a regular, trained sampler?	X				
2.2 Was a laboratory-provided TC sample bottle used?	X				
2.3 Was the aerator removed?			X		
2.4 Was the water tap flushed for at least 5 minutes?	X				
2.5 Was the tap disinfected or flamed?	X				
2.6 Did the sample get too warm prior to being placed on ice?		X			
2.7 Was there other sampler error? Describe		X			
2.8 If it is a seasonal system, were there any problems during the most recent start-up procedure?			X		
2.9 Any other sample protocol issues not previously mentioned?		X			
3. Review of the distribution system.					
3.1 Have any mains been recently replaced or service lines recently added?		X			
3.2 Have fire hydrants or blow offs been recently flushed?		X			

GUAM ENVIRONMENTAL PROTECTION AGENCY

Revised Total Coliform Rule (RTCR) Level 2 Assessment Form

Assessment Elements	Issues? Y	Issues? N	Issues? N/A	Issue Description	Corrective Action Taken or Planned to be Taken and Date
3.3 Have valves been recently exercised to direct flow?		X		3.4 On 4/21/22 , leak repair was conducted at Joaquin Perez Road – repairs made on the service lateral off of the main line. Water outage was required to repair the leak. On 4/22/22 leak repair was conducted on Chalan Kindo St. – 2" line leak repaired. Only houses on the Chalan Kindo St. were afffected.	3.4 Upon completion of repair of Joaquin Perez Road, water line was flushed.
3.4 Any leaks or main breaks noted?	X				
3.5 Are all of the backflow prevention devices operational and maintained?			X		Chalan Kindo repair consisted of 2" valve was repaired under pressures and fittings downstream of the valve was replaced.
3.6 Was there a total loss of pressure, low pressure (<20 psi) or changes in water pressure? If yes, when?	X				
3.7 Any areas of the distribution with low disinfectant levels (<0.2 mg/L)?		X		3.6 4-21-22 Loss of water pressure occurred during water outage at Joaquin Perez Road. Pressure during water outage was below 20 psi from 11:16 am to 2:00 pm on 4/21/2022.	3.6 When leak was repaired and lines were flushed, the pressure in the line was measured to be above 20 psi.
3.8 Any recent pump station failures or repairs?		X			
3.9 Air relief valve leaking?		X			
3.10 Standing water or debris in valve vault?	X			3.10 Standing water in the altitude valve vault	3.10. Water in altitude valve vault was drained.
3.11 Any recent power loss?		X			
3.12 Any unprotected cross connections (including yard hydrants and stock tanks)?			X		
3.13 Any other distribution issue not previously mentioned?		X			
4. Review of storage tank(s) **(Note the specific facility if any issues are found)**					
4.1 Is there a presence of animals or insects in the tank(s)?		X			
4.2 Are there breaches or holes of any sort into tank(s)?	X			4.2 Santa Rita Springs - gap is located between roof and wall where metal beams sit on.	4.2 Cover was installed at the Santa Rita Springs between the gap and the wall.
4.3 Is there any presence of animal droppings around openings, vents or overflows?		X			
4.4 Is there sediment buildup and floating debris in tank(s)?		X			
4.5 Have the tank(s) been cleaned within the last 5 years? If not, list when it was last cleaned.	X			4.5 Santa Rita Springs was last cleaned in 2018 when the cover was replaced.	
4.6 Is there a #24 mesh screen installed on vents and overflows?		X		4.6 Santa Rita Springs - #24 mesh screen on vents and overflow were found to be missing.	4.6 Installation of Vent and Overflow mesh screen at Santa Rita Springs were completed on 5-26-2022.
4.7 Is the #24 mesh screen damaged or not properly installed?		X		4.7 Santa Rita Springs #24 mesh screen was missing.	4.7 Santa Rita Springs #24 mesh screen on vent and overflow were installed on 5-26-2022
4.8 Is the overflow pipe directly connected to a tank drain, sanitary sewer or storm drain?		X			
4.9 Does the hatch have a solid, water proof, shoebox type lid that is properly sealed?	X				
4.10 Was the hatch locked or secured?	X				
4.11 Has the tank been accidently drained?		X			
4.12 Have there been high flows through the tank?		X			
4.13 Was there high water age in the tank (infrequent water use)?		X			
4.14 Was the sample taken when the tank was at the low level mark?		X			

GUAM ENVIRONMENTAL PROTECTION AGENCY

Revised Total Coliform Rule (RTCR) Level 2 Assessment Form

Assessment Elements	Issues? Y	Issues? N	Issues? N/A	Issue Description	Corrective Action Taken or Planned to be Taken and Date
4.15 Failure or improper operation on tank telemetry/altitude valves/controls?	☐	☒	☐		
4.16 Any recent repairs on the tank(s)?	☐	☒	☐		
4.17 Was there any power loss?	☐	☒	☐		
4.18 Was the tank vandalized or subject to tampering?	☐	☒	☐		
4.19 Any other storage tank issues not previously mentioned above?	☒	☐	☐	4.19 4/26/ 22 .Santa Ann area had water outage during the replacement valve at the Santa Ana tank.	4.19 During restoration fire hydrants were open to bleed and flush the lines .
5. Review of treatment process (if applicable)					
5.1 Has the treatment been bypassed altogether at any time or have individual processes been interrupted by power outages or other causes? If yes, provide details on when, which processes and for how long?	☐	☐	☒		
5.2 Have there been any new treatment processes added or new equipment installed?	☐	☒	☐		
5.3 Have there been any recent repairs of major unit processes or treatment equipment?	☐	☒	☐		
5.4 Have there been any changes in the operational procedures used for treating the water such as, changes in chemical dosages or changes in coagulant chemicals used? If yes, provide details of the change and when it occurred.	☐	☒	☐		
5.5 Has a coagulant been added at all times the plant has been filtering water?	☐	☐	☒		
5.6 Have there been changes in raw water quality?	☐	☒	☐		
5.7 Was the finished water turbidity increasing?	☐	☒	☐		
5.8 Have filter clogging algae caused more frequent backwashing?	☐	☐	☒		
5.9 Has a disinfectant been added at all times or have there been any failures in adding disinfectant for any length of time?	☐	☒	☐		
5.10 Has there been any vandalism or tampering at the plant?	☐	☒	☐		
5.11 Any other treatment plant issues not previously mentioned above?					
6. Sources – Well(s) (Note the specific facility if any issues are found)					
6.1 Is the sanitary seal intact?	☐	☐	☒		
6.2 Is the well cap defective or damaged or not water tight?	☐	☐	☒		
6.3 Does the vent have a #24 mesh screen?	☐	☐	☒		
6.4 Is the vent screen damaged or not installed properly?	☐	☐	☒		

GUAM ENVIRONMENTAL PROTECTION AGENCY

Revised Total Coliform Rule (RTCR) Level 2 Assessment Form

Assessment Elements	Issues? Y	Issues? N	Issues? N/A	Issue Description	Corrective Action Taken or Planned to be Taken and Date
6.5 Does the vent and pump to waste terminate in an air gap of at least three pipe diameters above the ground?	☐	☐	☒		
6.6 How is the well used? (Circle if applicable)	☐	☐		Primary Backup Emergency	
6.7 Are there any unprotected cross connections at the wellhead? Are there any unprotected openings in the pump or pump assembly?	☐	☐	☒		
6.8 Is the pitless adapter damaged?	☐	☐	☒		
6.9 Is there a missing or damaged grout seal?	☐	☐	☒		
6.10 Has there been any recent work performed on the pump?	☐	☐	☒		
6.11 Is the wellhead secured to prevent unauthorized access?	☐	☐	☒		
6.12 Have there been any sewer spills, source water spills or other disturbances near the well?	☐	☐	☒		
6.13 Is the well pit in standing water or evidence of flooding?	☐	☐	☒		
6.14 Any other well issues not previously mentioned above?	☐	☐	☒		
Sources- Spring(s) **(Note the specific facility if any issues are found)**					
6.15 Is there evidence of flooding or infiltration of surface water runoff around the spring?	☐	☒	☐		
6.16 Is the spring box improperly developed or poorly maintained?	☐	☒	☐		
6.17 Are there dead animals near the spring?	☐	☒	☐		
6.18 Any other issues about springs not previously mentioned above?	☐	☒	☐		
Sources-purchased water					
6.19 Water quality issues with supplier?	☐	☒	☐		
6.20 Low disinfectant residual from supplier (typically $\leq$0.02 mg/L)?	☐	☒	☐		
6.21 Any other purchased water issues not previously mentioned above?	☐	☒	☐		
Applicable to all sources					
6.22 Has an unapproved source been used?	☐	☒	☐		
6.23 Has there been a change in sources?	☐	☒	☐		
6.24 Has there been recent rapid snowmelt, heavy rainfall or flooding?	☐	☒	☐		
6.25 Any evidence of animals near the source?	☐	☒	☐		
6.26 Have there been algae blooms?	☐	☒	☐		

GUAM ENVIRONMENTAL PROTECTION AGENCY

Revised Total Coliform Rule (RTCR) Level 2 Assessment Form

Assessment Elements	Issues? Y	N	N/A	Issue Description	Corrective Action Taken or Planned to be Taken and Date
6.27 Is the source water sample for ground water systems E. coli positive? This may indicate that the positive sample is originating from the source and may be a continuous source of contamination.	☐	☒	☐		
6.28 Any other source issues not previously mentioned above?	☐	☒	☐		
7. Significant Deficiencies					
7.1 Are there any unaddressed significant deficiencies? This may indicate that the problem is known and is in the process of being remedied. Include approved corrective action date and status of each corrective action.	☒	☐	☐	7.1 Gap between roof and wall where metal beams sits at Santa Rita Springs was identified as a significant deficiency at the last sanitary survey inspection.	7.1 Santa Rita Springs - cover was constructed for gap between roof and wall was completed 5-26-22.

Additional Comments:
GWA conducted field inspection and assessment from April 28 to May 13, 2022 to determine the potential cause of the positive TC/ E.coli results. GWA conducted inspection of customers who recorded any reverse flow, lack a backflow preventers on agricultural meter, and areas where customers made complaints of smelling foul odor. GWA did not observe anything of significance that can be identified as the cause of the contamination. After reviewing a chronology of events that occurred prior to and after the positive results and the review of the water distribution system in the service area, GWA has concluded that the potential cause of the positive result was due to a main water line break that occurred which caused fluctuation to the pressure in the system in the Sinifa service area which has the capacity to flow into the Agat service area and introduce contaminates into the system. Preventative and corrective action were taken immediately to included repeat sampling, increase flushing of the Agat area, distribution of the Boil Water Notice to Mayor's office and affected residents, and subsequent sampling to confirm that the system was clear. To ensure this does not happen again, GWA will increase the amount of flushing in the area after a main waterline break, issue a precautionary BWN to affected areas, make efforts to keep the pressure above the minimum requirements of above 20 psi, continue pipe replacement and other critical water system upgrades and ensure agricultural customers have backflow preventers installed.

Name of Assessor completing the form (PRINTED): Vincent E.C. Pangelinan

Signature: [signature] **Date:** 5-27-22

Water system responsible party (PRINTED):

Signature: M.C. BORDALLO [signature] **Date:** 6·3·2022

Reserved for GUAM EPA Review

	Yes	No	Comments
1. Has assessment been successfully completed?	☑	☐	
2. Likely reason for EC+ occurrence has been found.	☑	☐	
3. System has corrected the problem.	☑	☐	
4. Corrective Action Approved?	☑	☐	

RCD/RVD BY: JULIANA MENDOZA [signature]

DATE : JUNE 07, 2022

Gmail

Julie Mendoza <julie.mendoza@epa.guam.gov>

RE: GWA submittal to GEPA RTCR Level 2 Assessment -signed version

3 messages

vangie@guamwaterworks.org <vangie@guamwaterworks.org> Fri, Jun 3, 2022 at 4:39 PM
To: Julie Mendoza <julie.mendoza@epa.guam.gov>
Cc: "Miguel Bordallo (GWA)" <mcbordallo@guamwaterworks.org>, thomas@guamwaterworks.org, "Paul J. Kemp" <paulkemp@guamwaterworks.org>, Vincent Pangelinan <vpangelinan@guamwaterworks.org>, Ray Quintanilla <rayq@guamwaterworks.org>, "Jennifer O. Cruz" <jocruz@guamwaterworks.org>, Brian Bearden <brian.bearden@epa.guam.gov>, "Walter S. Leon Guerrero" <walter.leonguerrero@epa.guam.gov>, "Ann D. Borja-Gallardes" <aborjagallardes@guamwaterworks.org>, lizg@guamwaterworks.org, Jerry Aquino - GEPA <jerry.aquino@epa.guam.gov>, Sierra Bettis <sierra.bettis@epa.guam.gov>

Hafa Adai,

Attached is the signed version of the Level 2 Assessment form. Please let us know if there is anything else you needed. Thank you

Vangie

From: Julie Mendoza <julie.mendoza@epa.guam.gov>
Sent: Wednesday, June 1, 2022 2:16 PM
To: Vangie Lujan <vangie@guamwaterworks.org>
Cc: Miguel Bordallo (GWA) <mcbordallo@guamwaterworks.org>; thomas@guamwaterworks.org; Paul J. Kemp <paulkemp@guamwaterworks.org>; Vincent Pangelinan <vpangelinan@guamwaterworks.org>; Ray Quintanilla <rayq@guamwaterworks.org>; Jennifer O. Cruz <jocruz@guamwaterworks.org>; Brian Bearden <brian.bearden@epa.guam.gov>; Walter S. Leon Guerrero <walter.leonguerrero@epa.guam.gov>; Ann D. Borja-Gallardes <aborjagallardes@guamwaterworks.org>; lizg@guamwaterworks.org; Jerry Aquino - GEPA <jerry.aquino@epa.guam.gov>; Sierra Bettis <sierra.bettis@epa.guam.gov>
Subject: Re: GWA submittal to GEPA RTCR Level 2 Assessment

Hafa Adai:

On Page 2 item 3.4 - Please give a description of the issue for 4/21/2022 under the column "Issue Desciption". The corrective response for the issue should be described and noted under the column "Corrective Action Taken".

On Page 2 item 3.6 - Please change your response under Issue Description to 3.6 not 3.5 and indicate a date of when the water pressure was below 20 psi and what was the corrective action taken on the next column.

On Page 2 item 4.6 - Please indicate the facility name of the storage tank. Describe the issue for example "no #24 non-corrosive mesh screen on vents and overflow" and on the next column describe the corrective action taken, for example "installed #24 non-corrosive mesh screen on vents and overflow." You must indicated a date of when the mesh screen will be installed at the overflow pipe.

On Page 2 item 4.7 and 4.9 - Please describe the issues and findings for these items under the column Issue Descirption and on the next column describe corrective actions taken.

On Page 2 item 4.10 - remove response. Only describe if there are issues.

On Page 5 item 7.1 - Please indicate the name of the facility with the deficiency. Describe what the corrective actions taken.

On Page 5, either Miguel Bordallo or Tom Cruz (as acting GM) needs to sign as the Water System Responsible Party.

For now these are my comments that needs to be corrected and addressed. Please re-submit the corrections.

Please let me know if you have any questions or concerns.

Si Yu'us Ma'ase and Thank You!

JULIANA DLR. MENDOZA | Environmental Health Specialist II |

Safe Drinking Water Information System (SDWIS) Administrator

Safe Drinking Water Program | Guam Environmental Protection Agency

3304 Mariner Avenue #17, Barrigada, Guam 96913

Telephone: 671-300-9026/4751/4752

Guam EPA Website: epa.guam.gov | email: julie.mendoza@epa.guam.gov

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On Wed, Jun 1, 2022 at 12:56 PM Julie Mendoza <julie.mendoza@epa.guam.gov> wrote:

> Hafa Adai Vangie:
>
> Thank you so much for your quick response. The Level 2 Assessment form is now showing that all questions have been answered.

If I have any questions or concerns, I will let you know.

Si Yu'us Ma'ase and Thank You!

JULIANA DLR. MENDOZA | Environmental Health Specialist II |

Safe Drinking Water Information System (SDWIS) Administrator

Safe Drinking Water Program | Guam Environmental Protection Agency

3304 Mariner Avenue #17, Barrigada, Guam 96913

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On Wed, Jun 1, 2022 at 12:53 PM <vangie@guamwaterworks.org> wrote:

Julie

The attached is the Level 2 Assessment form with all the questions answered. I am so very sorry, I apologize . It seems that it was not correctly printed. Sorry for the inconvenient. It was responded to in the digital file but something happened in the printed version. Please let me know if there is anything else.

Vangie

From: Julie Mendoza <julie.mendoza@epa.guam.gov>
Sent: Wednesday, June 1, 2022 12:35 PM
To: Vangie Lujan <vangie@guamwaterworks.org>
Cc: Miguel Bordallo (GWA) <mcbordallo@guamwaterworks.org>; thomas@guamwaterworks.org; Paul J. Kemp <paulkemp@guamwaterworks.org>; Vincent Pangelinan <vpangelinan@guamwaterworks.org>; Ray Quintanilla <rayq@guamwaterworks.org>; Jennifer O. Cruz <jocruz@guamwaterworks.org>; Brian Bearden <brian.bearden@epa.guam.gov>; Walter S. Leon Guerrero <walter.leonguerrero@epa.guam.gov>; aborjagallardes@guamwaterworks.org; lizg@guamwaterworks.org; Jerry Aquino - GEPA

<jerry.aquino@epa.guam.gov>; Sierra Bettis <sierra.bettis@epa.guam.gov>
Subject: Re: GWA submittal to GEPA RTCR Level 2 Assessment

Hafa Adai Vangie:

I reviewing GWA South's Level 2 Assessment form that you submitted to GEPA on May 27, 2022. After reviewing the Level II Assessment, it is not complete. Please review the questions in the form and a response is needed for each question either YES or NO or NA.

Please re-submit and an electronic copy is acceptable.

Si Yu'us Ma'ase and Thank You!

JULIANA DLR. MENDOZA | Environmental Health Specialist II |

Safe Drinking Water Information System (SDWIS) Administrator

Safe Drinking Water Program | Guam Environmental Protection Agency

3304 Mariner Avenue #17, Barrigada, Guam 96913

Telephone: 671-300-9026/4751/4752

Guam EPA Website: epa.guam.gov | email: julie.mendoza@epa.guam.gov

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On Fri, May 27, 2022 at 4:47 PM <vangie@guamwaterworks.org> wrote:

Hafa adai

Attached please find the signed documents.

Si Yu' us Ma'ase'

Evangeline Lujan

Senior Regulatory Analyst

1-671-300-6887

GEPA rtcr_level_2_assessment_form-Final corrected MCB Signed.pdf
1067K

Julie Mendoza <julie.mendoza@epa.guam.gov> Fri, Jun 3, 2022 at 4:44 PM
To: Vangie Lujan <vangie@guamwaterworks.org>
Cc: "Miguel Bordallo (GWA)" <mcbordallo@guamwaterworks.org>, "thomas@guamwaterworks.org" <thomas@guamwaterworks.org>, "Paul J. Kemp" <paulkemp@guamwaterworks.org>, Vincent Pangelinan <vpangelinan@guamwaterworks.org>, Ray Quintanilla <rayq@guamwaterworks.org>, "Jennifer O. Cruz" <jocruz@guamwaterworks.org>, Brian Bearden <brian.bearden@epa.guam.gov>, "Walter S. Leon Guerrero" <walter.leonguerrero@epa.guam.gov>, "Ann D. Borja-Gallardes" <aborjagallardes@guamwaterworks.org>, "lizg@guamwaterworks.org" <lizg@guamwaterworks.org>, Jerry Aquino - GEPA <jerry.aquino@epa.guam.gov>, Sierra Bettis <sierra.bettis@epa.guam.gov>

Thank you. I will review it and get back to you if I have any questions.

Juliana Mendoza
[Quoted text hidden]

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vangie@guamwaterworks.org <vangie@guamwaterworks.org> Fri, Jun 3, 2022 at 4:53 PM
To: Julie Mendoza <julie.mendoza@epa.guam.gov>
Cc: "Miguel Bordallo (GWA)" <mcbordallo@guamwaterworks.org>, thomas@guamwaterworks.org, "Paul J. Kemp" <paulkemp@guamwaterworks.org>, Vincent Pangelinan <vpangelinan@guamwaterworks.org>, Ray Quintanilla <rayq@guamwaterworks.org>, "Jennifer O. Cruz" <jocruz@guamwaterworks.org>, Brian Bearden <brian.bearden@epa.guam.gov>, "Walter S. Leon Guerrero" <walter.leonguerrero@epa.guam.gov>, "Ann D. Borja-Gallardes" <aborjagallardes@guamwaterworks.org>, lizg@guamwaterworks.org, Jerry Aquino - GEPA <jerry.aquino@epa.guam.gov>, Sierra Bettis <sierra.bettis@epa.guam.gov>

Thank you

vangie

[Quoted text hidden]