

# Enforcing the Law in California



Individuals or companies who supply drinking water to 25 or more people for at least 60 days a year must meet federal standards of water quality. For years, EPA's San Francisco Office of Drinking Water Compliance and Enforcement has taken pains to make sure that small drinking water systems meet the standards. During the past year, the office focused on migrant labor camps' drinking water systems in California. Officials knew that migrant farm workers were especially vulnerable to environmental hazards, and they were concerned that the camps shared many, if not more, of the problems they'd found with small systems throughout California.

From a list provided by the state of more than 1,000 labor camps, EPA sorted out over 300 that might be operating drinking water systems as defined by the Safe Drinking Water Act. They were spread throughout 41 of California's 58 counties. Some of these camps, it was discovered, were no longer in existence; a few were served by larger, regulated public water systems.

Further investigation of the camps that were operating water systems meeting the definition of a small public water system revealed 191 to be in violation of the law. They served more than 8,500 people in 20 counties. Of the 191 systems in violation, EPA found that 141 were not recognized by the state as public water systems and,

as a result, weren't tracked or monitored for any potential violations.

EPA found that most of these systems were not sampling their water sufficiently for contaminants. Some had often exceeded limits for coliform bacteria, and some exceeded limits for nitrates. The presence of coliform bacteria in drinking water indicates that organisms may be present that can cause diseases such as typhoid, cholera, infectious hepatitis, and dysentery. Coliform bacteria also can indicate that parasites are present. Nitrate, which derives from sewage, fertilizers, and feedlots, poses a threat of "blue baby syndrome," a potentially life-threatening anemic condition in babies up to six months of age.

More than one county contact warned that strict enforcement of the

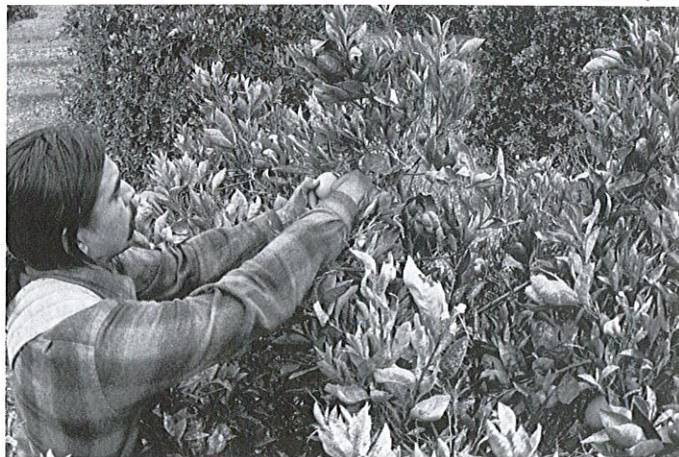
drinking water regulations might result in the closure of many labor camps, creating additional housing, welfare, and social burdens for county administrators, taxpayers, and camp residents. According to these contacts, labor camp owners have often chosen to close their camps rather than comply with regulations.

On September 6, 1991, EPA issued notices of violation to the 191 labor camp owners and the California Department of Health Services, Office of Drinking Water. The notices warned the owners either to come into compliance with the Safe Drinking Water Act or to face further enforcement action and penalties. The maximum civil penalty is \$25,000 per day per violation for each day a system is in violation.

With full cooperation from the state and counties, 49 systems are now reported to be in full compliance. Another 79 are in the process of permit application and/or conducting the required sampling under supervision from their counties. Nine labor camps have stopped operating, eight of them permanently, since September 1991. It is not clear how many of the closures were related to EPA's enforcement. The remaining systems were not actually public water systems due to misinformation, originally received from the counties, regarding numbers of people housed or length of occupancy.

EPA will continue to work with the state Office of Drinking Water and the affected counties to identify and ensure that all applicable migrant labor camp water systems are inventoried and monitored for compliance with the Safe Drinking Water Act. □

USDA photo.



*Migrant farm workers are especially vulnerable to environmental hazards.*