



# Mecchi Water Company LLC

1367 Tofts Drive San Jose, CA 95131

June 30, 2022

Advice Letter No. 28A-W

TO THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Mecchi Water Company (MECCHI) hereby transmits for filing one original and one copy of this advice letter (AL) and the following tariff sheets which are enclosed:

<u>NEW SHEET #</u>	<u>TITLE</u>	<u>CANCELLING SHEET #</u>
274-W	Schedule No. 1, General Metered Service	260-W
275-W	Schedule No. 2, Flat Rate Service	261-W
276-W	Table of Contents	273-W

## REQUEST

By AL No. 28A-W MECCHI seeks to recover costs charged to the Water Quality Balancing Account (WQBA). The recorded costs in the balancing account were incurred to address the issues raised in the State Water Resources Control Board Division of Drinking Water (SWRCB) Citation #02\_ 17\_20C\_013. The SWRCB ordered MECCHI to engage an engineering firm to study and create a plan to replace the user lines that do not meet materials and standards required by the State. As of October 15, 2021, the total amount to be recovered is \$16,375.75. MECCHI requests that the WQBA balance be amortized with a surcharge of \$15.16 to each customer's bill for 36 months. This annualized amount is 15.0% of gross annual revenues (\$36,377) adopted for the most recent general rate case, test year 2013, Resolution W-4887, December 1, 2011, and 16.5% of MECCHI'S present rates (\$32,995.09). MECCHI'S present rates became effective June 22, 2012, through Advice Letter No. 21-W CPI offset.

## BACKGROUND

On July 8, 2020, the SRWCB directed MECCHI to engage and work with an engineering consulting firm to develop a plan to investigate and determine the material of the user service lines. The plan must be submitted to the SRWCB by

# Mecchi Water Company LLC

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August 8, 2020. As a minimum, MECCHI must pothole at the connection between the water main and certain user service lines to determine their materials and content. MECCHI engaged the services of Bracewell Engineering to comply with the SRWCB order.

MECCHI has 28 user service lines whose content cannot be determined in its distribution system. In response to the citation, MECCHI submitted a replacement plan on October 8, 2020. However, the October 8, 2020, plan was not approved by the SRWCB as the proposal did not adequately address all unknown user service line material. In addition, the plan did not include a schedule to replace lead pipe material, if found during the investigation. MECCHI was required to submit a revise plan by November 18, 2020.

On September 16, 2020, Citation #02\_17\_20C\_013 was issued to MECCHI for failure to comply with California Health and Safety Code, Section 116885 which requires the utility to compile an inventory of user service lines of unknown material and provide a timeline to the SRWCB by July 1, 2020, for replacement of those user service lines. On November 4, 2020, the SRWCB reviewed the proposal and found that plans for Phase 1 acceptable but not Phase 2. Under Phase 2, all unknown service lateral material must be identified through potholing regardless of the age of the home. The proposal did not include a schedule to replace lead pipe material if found during the investigation. The proposal did not satisfy the requirements of Section 116885 and therefore not acceptable. By November 18, 2020, MECCHI was ordered to submit a proposal that identifies the material of all user service lines and a schedule to replace any lead pipe material.

On November 16, 2020, a plan was submitted by MECCHI that proposed to identify the user service line material in two phases. Phase 1 includes mapping and inventorying the MECCHI distribution system using a pipe detector instrument that detects steel pipe material, such as galvanized steel. Water main and service lines that cannot be detected will be investigated in Phase 2. Under Phase 2, all service laterals of unknown pipe material will be potholed, and the pipe material determined. If any lead was found after potholing the service lateral, the lead pipe material will be replaced with pipe materials meeting NSF/ANSI 61 standards. The utility anticipates additional expenses related to this replacement of service lines project.

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## TIER DESIGNATION AND REQUESTED EFFECTIVE DATE

This AL and enclosed tariff sheets are submitted pursuant to General Order (GO.) 96-B. AL 28A-W is designated as a Tier 1 filing. This advice letter will become effective upon filing.<sup>1</sup>

## NOTICE

A copy of this AL has been served to all parties listed on the service list<sup>2</sup> of AL 28A-W. This filing will not cause withdrawal of service nor conflict with any other schedule or rule.

## RESPONSE OR PROTEST<sup>3</sup>

Anyone may respond to or protest this advice letter. A response supports the filing and may contain information that proves useful to the Commission in evaluating the advice letter. A protest objects to the advice letter in whole or in part and must set forth the specific grounds on which it is based. These grounds are:

1. The utility did not properly serve or give notice of the advice letter;
2. The relief requested in the advice letter would violate statute or Commission order, or is not authorized by statute or Commission order on which the utility relies;
3. The analysis, calculations, or data in the advice letter contain material error or omissions;
4. The relief requested in the advice letter is pending before the Commission in a formal proceeding; or
5. The relief requested in the advice letter requires consideration in a formal hearing, or is otherwise inappropriate for the advice letter process; or
6. The relief requested in the advice letter is unjust, unreasonable, or discriminatory (provided that such a protest may not be made where it would require relitigating a Prior order of the Commission).

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<sup>1</sup> GO. 96-B, Water Industry Rule 7.3.

<sup>2</sup>GO. 96-B, Water Industry Rule 4.2

<sup>3</sup> GO. 96-B, General Rule 7.4.1

# Mecchi Water Company LLC

1367 Tofts Drive San Jose, CA 95131

A protest may not rely on policy objections to an AL where the relief requested in the AL follows rules or directions established by statute or Commission order applicable to the utility.

A protest shall provide citations or proofs where available to allow staff to properly consider the protest. The WD must receive a response or protest via email (**or** postal mail) within 20 days of the date the AL is filed. The addresses for submitting a response or protest are:

**Mailing Address:**

Tariff Unit  
Water Division, 3rd Floor  
California Public Utilities  
Commission  
505 Van Ness Avenue  
San Francisco, CA 94102

**Email Address:**

[Water.Division@cpuc.ca.gov](mailto:Water.Division@cpuc.ca.gov)

On the same day the response or protest is submitted to WD, the respondent or protestant shall send a copy of the protest to MECCHI at:

**Mailing Address:**

MECCHI Water Company  
Attn: Gary Ledesma  
1367 Tofts Drive  
San Jose, CA 95131

**Email Address:**

[garyled7@aol.com](mailto:garyled7@aol.com)

Cities and counties that need Board of Supervisors or Board of Commissioners approval to protest should inform WD, within the 20-day protest period, so that a late filed protest can be entertained. The informing document should include an estimate of the date the proposed protest might be voted on.

## **REPLIES**

The utility shall reply to each protest and may reply to any response. Each reply must be received by WD within five business days after the end of the protest

# Mecchi Water Company LLC

1367 Tofts Drive San Jose, CA 95131

period and shall be served on the same day to the person who filed the protest or response.<sup>4</sup>

## CERTIFICATE OF SERVICE

I hereby certify that the service list from Advice Letter #28A-W has been served a copy of this AL on June 30, 2022.

Executed in San Jose, California on June 30, 2022.

MECCHI Water  
Company LLC

By: /s/GARY LEDESMA

Gary Ledesma  
Owner

Enclosures

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<sup>4</sup>GO. 96-B, General Rule 7.4.3

# Mecchi Water Company LLC

1367 Tofts Drive San Jose, CA 95131

## Advice Letter #28A-W

### Service List

Bracewell Engineering  
Christopher Hauge  
[chris@bracewellengineering.com](mailto:chris@bracewellengineering.com)

Santa Clara Valley Water District  
Susan O'Neal  
[soneal@valleywater.org](mailto:soneal@valleywater.org)

California Department of Health Services  
Jose Lozano  
[Jose.Lozano@cdph.ca.gov](mailto:Jose.Lozano@cdph.ca.gov)

California Department of Health Services  
Eric Lacy  
[ericlacy@cdph.ca.gov](mailto:ericlacy@cdph.ca.gov)

Gary M. Ledesma  
[garyled7@aol.com](mailto:garyled7@aol.com)

Schedule No. 1

GENERAL METERED SERVICE

APPLICABILITY

Applicable to all metered water service.

TERRITORY

Crowner Subdivision, Tract No. 224. and vicinity, located 3/4 mile of San Martin, Santa Clara County.

RATES

Quantity Rate:

For all water, per 100 cu. ft. .... \$1.05

Service Charge:

		<u>Per Meter</u>	
		<u>Per Month</u>	
For	5/8 x 3/4-inch meter	.....	\$52.74

The Service Charge is a readiness-to-serve charge which is applicable to all metered service and to which is added the charge for water used computed at the Quantity Rate.

SPECIAL CONDITIONS:

1. All bills are subject to the reimbursement fee set forth in Schedule No. UF.

(D)

2. A \$15.16 bill surcharge shall be applied to each customer's monthly water bill to amortize the Water Quality Balancing Account of \$16,375.75. The surcharge shall be separately identified on each bill and in place for a period of 36 months, or until the full amount has been collected, from the effective date of this filing.

(N)

(N)

(To be inserted by utility)

Advice Letter No. 28A-W

Decision No. \_\_\_\_\_

Issued By

**Gary M. Ledesma**

**Owner**

(To be inserted by P.U.C.)

Date Filed \_\_\_\_\_

Effective \_\_\_\_\_

Resolution No. W-4698



Schedule No. 2

RESIDENTIAL FLAT RATE SERVICE

APPLICABILITY

Applicable to all flat water service furnished on a flat rate basis.

TERRITORY

Crowner Subdivision, Tract No. 224. and vicinity, located 3/4 mile of San Martin, Santa Clara County.

RATE

	Per Month
For each residence located on a single lot but irrigation of lawns and gardens Restricted to 300 square feet	\$76.95
For each additional residence on same lot	\$51.30

**SPECIAL CONDITIONS**

1. The above residential rates apply to a service connection not larger than one inch in diameter.
2. For service covered by the above classifications, if the utility elects a meter shall be installed and service provided under Schedule No. 1, General Metered Service, effective as of the first day of the following calendar month.
3. All bills are subject to the reimbursement fee for set forth in Schedule UF. (D)
4. **A \$15.16 bill surcharge shall be applied to each customer's monthly water bill to amortize the Water Quality Balancing Account of \$16,375.75. The surcharge shall be separately identified on each bill and in place for a period of 36 months, or until the full amount has been collected, from the effective date of this filing** (N)  
|  
|  
(N)

(To be inserted by utility)

Issued By

(To be inserted by P.U.C.)

Advice Letter No. 28A-W

**Gary M. Ledesma**

Date Filed \_\_\_\_\_

Decision No. \_\_\_\_\_

**Owner**

Effective \_\_\_\_\_

Resolution No. W-4698

**TABLE OF CONTENTS**

The following listed tariff sheets contain all effective rates and rules affecting the charges and services of the utility, together with other pertinent information.

<u>SUBJECT MATTER OF SHEET</u>	<u>P.U.C. SHEET NO.</u>	
Title Page	259-W	
Table of Contents	<b>276-W</b> , 257-W	(T)
Preliminary Statements	23-W, 24-W, 227-W, 228-W,	
Service Area Map	None	
<b>Rate Schedules:</b>		
Schedule No. 1 –General Metered Service	<b>274-W</b>	(N)
Schedule No. 2 – Residential Flat Rate Service	<b>275-W</b>	(N)
Schedule No. UF – Surcharge to Fund PUC Reimbursement Fee	269-W	
Schedule LC, Late Payment Charge	265-W	
<b>Rules:</b>		
No. 1 – Definitions	112-W, 113-W	
No. 2 – Description of Service	27-W	
No. 3 – Application for Service	245-W	
No. 4 – Contracts	29-W	
No. 5 – Special Information Required on Forms	246-W to 248-W	
No. 6 – Establishment and Re-establishment of Credit	32-W	
No. 7 – Deposits	249-W, 250-W	
No. 8 – Notices	251-W, 252-W	
No. 9 – Rendering and Payment of Bills	216-W, 217-W	
No. 10 – Disputed Bills	253-W 254-W	
No. 11 – Discontinuance and Restoration of Service	218-W - 225-W	
No. 12 – Information Available to Public	43-W, 44-W	
No. 13 – Temporary Service	45-W, 46-W	
No. 14 – Continuity of Service	47-W	
No. 15 – Main Extensions	188-W – 200-W	
No. 16 – Service Connections, Meters, & Customer’s Facilities	201-W – 207-W	
No. 17 – Standards for Measurements of Service	143-W	
No. 18 – Meter Tests & Adjustment of Bills for Meter Error	66-W - 68-W	
No. 19 – Service to Separate Premises & Multiple Units and Resale of Water	144-W - 145-W	
No. 20 – Water Conservation	208-W	
No.21 – Fire Protection	209-W	

(continued)

(To be inserted by utility)

Advice Letter No. 28A-W

Decision No. \_\_\_\_\_

*Issued By*

**Gary M. Ledesma**

**Owner**

(To be inserted by P.U.C.)

Date Filed \_\_\_\_\_

Effective \_\_\_\_\_

Resolution No. W-4698

**MECCHI WATER COMPANY  
AL #28A-W**

**WATER QUALITY BALANCING ACCOUNT SURCHARGE**

WQBA balance as of 10-15-21	\$ 16,375.75
No. of Service Connections	30 flat rates
Amount of Monthly Surcharge	\$ <b>15.16</b> per month for 36 months
Monthly Total	\$ 454.88

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WQBA balance as of 10-15-21	\$ 16,375.75
Adopted Gross Revenue per Res. W-4887	\$ 36,377.00
WQBA balance greater than 2%	45%
Percent increase in rates each year for 2 years	15.01%
Present Rates	\$ 32,995.09
Annualized surcharge to present rates	16.54%

# Mecchi Water Company

Advice Letter #28-W

3/7/2022

## Water Quality Balancing Account

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	Date	Invoice #	Name	Memo	Amount
1	09/20/2020	20-593	BRACEWELL ENGINEERING, INC	Lead and copper survey	770.00
2	10/31/2020	20-652	BRACEWELL ENGINEERING, INC	Lead and copper survey Extra Serices	904.00
3	11/30/2020	20-720	BRACEWELL ENGINEERING, INC	Extra Services and Materials	1,557.00
4	2/28/2021	21-194	BRACEWELL ENGINEERING, INC	Extra Services and Materials	1,138.00
5	3/31/2021	21-242	BRACEWELL ENGINEERING, INC	Extra Services and Materials	2,277.75
6	4/1/2021		ANDRES COLLI	Locating underground pipes and water delivery	980.00
7	4/30/2021	21-254	BRACEWELL ENGINEERING, INC	Consulting - Lead Service Line Replacement	2,586.00
8	5/31/2021	21-353	BRACEWELL ENGINEERING, INC	Consulting - Lead Service Line Replacement	2,531.00
9	8/31/2021	21-498	BRACEWELL ENGINEERING, INC	Consulting - Lead Service Line Replacement	847.50
10	9/30/2021	21-550	BRACEWELL ENGINEERING, INC	Consulting - Lead Service Line Replacement	1,934.50
11	3/30/2022	Mar-22	Frank B & Associates	Preparation and Filing WQBA	850.00
				<b>Total</b>	<b>16,375.75</b>

**Andres Colli  
626 11<sup>TH</sup>. Street  
Richmond Ca. 94801**

**April 1, 2021**

Receipt for works carried out in Morgan Hill, Ca. on November 24, 2020, for the location of pipes that are underground and that carry drinking water to the houses, according to a list that was provided by Mr. Lloyd Bracewell, which below is a list of those that were located and what the owners commented on the matter.

Labor of two people, plus the expenses incurred to carry out the work.

**T O T A L   \$ 980.00  
(Nine Hundred and Eighty Dollars)**

**14428**

This address is a large house and the water closing valve is in front of the house, we could see that it has copper pipes and is surrounded by a concrete floor, which the metal detector stays sounding but we are not sure if it is of metal pipe or are the rods that the concrete has.

**14456**

In this house we find galvanized pipe in the shut-off valve entering the house and it is surrounded by concrete the floor, the metal detector keeps making noise and we don't know if it is galvanized pipe or concrete rod.

**14470**

The shut-off valve in this house is made of copper and according to the owner, who was talking with us they have installed copper pipe from the house to the street.

**14484**

We could not find the water shut off valve in this house but we were able to talk with the owner and she told us that on one occasion they had to close the water from the street, we tried to find it on the street but couldn't see it because it is covered with gravel.

**14489**

In this house we couldn't enter, because it has a padlock the gate but we could see a box similar to the one used for water meters in the city and we cleaned it being able to see that it has a galvanized pipe about an inch thick.

**14500**

In this house the water shut off valve is made of copper but we couldn't tell what kind of pipe runs to the street and it has pavers all around.

**14514**

The water shut off valve in this house is  $\frac{3}{4}$  thick galvanized and the owner told us that the pipe that runs to the street is also galvanized.



**BRACEWELL ENGINEERING, INC**

155 MAST ST., UNIT 114, MORGAN HILL, CA 95037  
 [669] 258-5820 FAX [408] 498-7045  
 www.bracewellengineering.com

**Invoice**

<b>BILL TO</b>
Gary Ledesma Mecchi Water Company 1367 Tofts Dr. San Jose, CA 95131

<b>DATE</b>	<b>INVOICE #</b>
9/30/2020	20-593

<b>P.O. NO.</b>	<b>TERMS</b>	<b>DUE DATE</b>
	Due on receipt	10/21/2020

DESCRIPTION	QUANTITY	RATE	AMOUNT
<b>MECCHI WATER COMPANY WATER SYSTEM</b>			
<b>EXTRA SERVICES</b>			
September 2020			
Lead & Copper Survey			
Principal Engineer: Lead service line survey plan & Emails to/from DDW & GL	0.5	214.00	107.00
Principal Engineer: preparing water service line study using potholing for DDW approval	0.5	214.00	107.00
Principal Engineer: research pipe finder/metal detector as part of service line investigation plan	0.5	214.00	107.00
Principal Engineer: review water service line investigation w/RC & change plan to rely on pipe finder	0.5	214.00	107.00
Principal Engineer: email service lateral issues & options to DDW asking for guidance	0.5	214.00	107.00
Operations Manager: Call with DDW, Van & Eric about pipe identification	0.5	128.00	64.00
Operations Manager: Review Lead and Copper Service Line Survey Plan with DDW	0.5	128.00	64.00
Principal Engineer: conference call w/EL, VT, CH & RC about how to conduct service lateral survey	0.5	214.00	107.00
A service charge of 0.83% per month will be assessed on all past due balances exceeding 60 days. Please remit to above address.	<b>Total</b>		\$770.00





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**Invoice**

<b>BILL TO</b>
Gary Ledesma Mecchi Water Company 1367 Tofts Dr. San Jose, CA 95131

<b>DATE</b>	<b>INVOICE #</b>
10/31/2020	20-652

DESCRIPTION	P.O. NO.	TERMS	DUE DATE
		Due on receipt	11/15/2020
DESCRIPTION	QUANTITY	RATE	AMOUNT
<b>MECCHI WATER COMPANY WATER SYSTEM</b>			
<b>EXTRA SERVICES</b>			
October 2020			
Lead & Copper Survey			
Principal Engineer: Revise service lateral investigation plan & email GL to call to discuss	0.5	214.00	107.00
Principal Engineer: Review w/GL details of service lateral survey plan approved by DDW	0.5	214.00	107.00
Principal Engineer: Drafting user service line inventory plan for DDW approval	1	214.00	214.00
Principal Engineer: Finish service lateral inventory & Pb pipe replacement plan to submit to DDW	1.5	214.00	321.00
Subtotal			749.00
Friday 10/16/2020			
Ace Hardware - Materials to Fix Door on Well 2		33.00	33.00
Operator I: Fix well door	2	61.00	122.00
Subtotal			155.00
A service charge of 0.83% per month will be assessed on all past due balances exceeding 60 days. Please remit to above address.	<b>Total</b>		\$904.00



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**Invoice**

<b>BILL TO</b>
Gary Ledesma Mecchi Water Company 1367 Tofts Dr. San Jose, CA 95131

<b>DATE</b>	<b>INVOICE #</b>
11/30/2020	20-720

	P.O. NO.	TERMS	DUE DATE
		Due on receipt	12/15/2020
DESCRIPTION	QUANTITY	RATE	AMOUNT
<b>MECCHI WATER COMPANY WATER SYSTEM</b>			
<b>EXTRA SERVICES</b>			
November 2020			
Materials			
A Tool Shed - Rental of Pipe Locator for LSLR Plan		151.00	151.00
Subtotal			151.00
MBAS: Well #2 Asbestos (extra tests required by DDW)	1	275.00	275.00
MBAS: Well #2 Glyphosate (extra tests required by DDW)	1	188.50	188.50
Principal Engineer: LSLR: Review DDW response to service lateral survey plan & discuss with Gary Ledesma	0.5	214.00	107.00
Principal Engineer: LSLR: Revise water service lateral pipe materials survey plan for DDW	0.5	214.00	107.00
Office Assistant: LSLR: Edit parameters and generate extra asbestos COCs	0.25	65.00	16.25
Principal Engineer: LSLR: review service lateral field survey guidelines w/AC	0.5	218.00	109.00
Principal Engineer: LSLR: create maps & logsheet for AC to use in field survey & call GL to coordinate	0.5	218.00	109.00
Office Assistant: LSLR: Talk w/ LB re Pipe Locator, vest, etc. Call A Tool Shed to inquire about renting Pipe Locator, Ace/Home Deport purchase safety vests for surveyors.	1.25	65.00	81.25
Office Assistant: LSLR: Proof, edit & print LSLR Inventory Notices, Follow up w/ A Tool Shed re: Pipe Locator rental	0.5	65.00	32.50
Principal Engineer: LSLR: coordinate survey w/GL, JB & AC & prepare service line survey notification	0.5	218.00	109.00
Office Assistant: LSLR: Go to A Tool Shed with Andre to pick up pipe locator rental	0.5	65.00	32.50
Principal Engineer: LSLR: coordinate water pipe survey w/AC & GL & call rental place if have right detector	0.5	218.00	109.00
<b>Total</b>			



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<b>DATE</b>	<b>INVOICE #</b>
11/30/2020	20-720

<b>P.O. NO.</b>	<b>TERMS</b>	<b>DUE DATE</b>
	Due on receipt	12/15/2020

DESCRIPTION	QUANTITY	RATE	AMOUNT
Operator I: LSLR: Returning Pipe Locator Equipment Rental	2	65.00	130.00
<b>Total</b>			<b>\$1,557.00</b>

A service charge of 0.83% per month will be assessed on all past due balances exceeding 60 days. Please remit to above address.



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<b>BILL TO</b>
Gary Ledesma Mecchi Water Company 1367 Tofts Dr. San Jose, CA 95131

<b>DATE</b>	<b>INVOICE #</b>
2/28/2021	21-194

DESCRIPTION	P.O. NO.	TERMS	DUE DATE
		Due on receipt	3/15/2021
DESCRIPTION	QUANTITY	RATE	AMOUNT
<b>MECCHI WATER COMPANY WATER SYSTEM</b>			
<b>EXTRA SERVICES</b>			
February 2021			
Materials			
Home Depot - Fire Extinguisher for Plant		28.00	28.00
Subtotal			28.00
Consulting - Lead Service Line Replacement			
Principal Engineer: Review Failed Geophones Pipeline Location Results with Operator & Email Status to DDW	0.5	218.00	109.00
Principal Engineer: Call Jack Ledesma for Advice on Locating Water Line Valve Boxes He Had Worked On	0.5	218.00	109.00
Principal Engineer: Coordinate Water System Inspection to Locate Valve Boxes with Client & BEI Staff	0.5	218.00	109.00
Operations Manager: Provide Guidance to Operator in Search for Valve Boxes with Metal Detector	1	131.00	131.00
Operator I: Search for Meter Boxes Using Metal Detector & Mark Locations	2.5	65.00	162.50
Principal Engineer: Review Valve Box Findings with BEI Staff & Email Results to DDW	0.5	218.00	109.00
Principal Engineer: Emails to & from DDW for Guidance in How Far to Go in Digging Up Valve Boxes	0.5	218.00	109.00
Principal Engineer: Look Up Addresses & Ages of Houses with Found Valve Boxes & Select 1 to Dig Up	0.5	218.00	109.00
Operator I: Dig Out Selected Meter Box, Take Photos, & Mark on Maps	2	65.00	130.00
Office Assistant: Process outside lab reports: extra W2 Glyphosate	0.5	65.00	32.50
A service charge of 0.83% per month will be assessed on all past due balances exceeding 60 days. Please remit to above address.	<b>Total</b>		\$1,138.00



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<b>DATE</b>	<b>INVOICE #</b>
3/31/2021	21-242

DESCRIPTION	P.O. NO.	TERMS	DUE DATE
		Due on receipt	4/15/2021
DESCRIPTION	QUANTITY	RATE	AMOUNT
<b>MECCHI WATER COMPANY WATER SYSTEM</b>			
<b>EXTRA SERVICES</b>			
March 2021			
Materials			
USA Blue Book - Rebuild Kit for Chlorine Pump		209.00	209.00
Subtotal			209.00
Time & Mileage			
Operator I: Rebuild Chlorine Pump	1.5	65.00	97.50
Operator I: Service Line Break, Find and Dig Out Curb Stop Valve and Meter, Shut Off Water and Confirm Water Leak Stopped	2	65.00	130.00
Subtotal			227.50
Lead Service Line Replacement Study			
Principal Engineer: Provide Operators with List of Potential Addresses with Valve Boxes to Pothole	0.5	218.00	109.00
Operator I: Locate all Valve Boxes That Could Be Found on Crowner Ave	4	65.00	260.00
Operator I: Dig Up 2 Valve Boxes & Then Dig Down at Each Location to Locate Water Main	8.75	65.00	568.75
Operations Manager: Coordinate with Operators How to Locate Valve Boxes and Water Mains.	1	131.00	131.00
Principal Engineer: Review Excavated Service Line Connection Materials with Operations Manager	0.5	218.00	109.00
Operations Manager: Review Excavated Service Line Connection Materials with Principal Engineer	0.5	131.00	65.50
Operations Manager: Coordinate with Operators to Enlarge Excavation to Expose Service Lateral Pipe Connection Materials.	1	131.00	131.00
<b>Total</b>			



**BRACEWELL ENGINEERING, INC**

155 MAST ST., UNIT 114, MORGAN HILL, CA 95037  
 [669] 258-5820 FAX [408] 498-7045  
 www.bracewellengineering.com

**Invoice**

<b>BILL TO</b>
Gary Ledesma Mecchi Water Company 1367 Tofts Dr. San Jose, CA 95131

<b>DATE</b>	<b>INVOICE #</b>
3/31/2021	21-242

<b>P.O. NO.</b>	<b>TERMS</b>	<b>DUE DATE</b>
	Due on receipt	4/15/2021

DESCRIPTION	QUANTITY	RATE	AMOUNT
Operator I: Finish Digging Up Water Main and Exposing Service Lateral Pipe Connection Materials & Take Photos	4.5	65.00	292.50
Principal Engineer: Review Excavated Service Line Connection Materials with Operations Manager	0.5	218.00	109.00
Operations Manager: Review Excavated Service Line Connection Materials with Principal Engineer	0.5	131.00	65.50
Subtotal			1,841.25
A service charge of 0.83% per month will be assessed on all past due balances exceeding 60 days. Please remit to above address.			<b>Total</b> \$2,277.75



**BRACEWELL ENGINEERING, INC**

155 MAST ST., UNIT 114, MORGAN HILL, CA 95037  
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 www.bracewellengineering.com

**Invoice**

<b>BILL TO</b>
Gary Ledesma Mecchi Water Company 1367 Tofts Dr. San Jose, CA 95131

<b>DATE</b>	<b>INVOICE #</b>
4/30/2021	21-254

<b>P.O. NO.</b>	<b>TERMS</b>	<b>DUE DATE</b>
	Due on receipt	4/30/2021

DESCRIPTION	QUANTITY	RATE	AMOUNT
<b>MECCHI WATER COMPANY WATER SYSTEM</b>			
<b>EXTRA SERVICES</b>			
April 2021			
Consulting - Lead Service Line Replacement			
Operator I: Meet with Principal Engineer and Jack Ledesma from Mecchi Water Company and Search for Missing Valve Boxes	3	65.00	195.00
Operations Manager: Review Water System Sketch with Principal Engineer and Which Valve Box Locations to Pothole	1	131.00	131.00
Principal Engineer: Based on Water System Details Provided by Jack Ledesma Prepared Draft Water System Map	1	218.00	218.00
Principal Engineer: Send Email to DDW for Approval to Finish by Potholing 4 Valve Boxes	0.5	218.00	109.00
Operator I: Pothole 4 Valve Boxes, Expose Water Main Connection, Determine Pipe Materials, Take Photos	18	65.00	1,170.00
Principal Engineer: Prepare Letter Stating Knowledge of Pipe Materials in Use During Time Worked on Water System for J Ledesma's Signature	1	218.00	218.00
Principal Engineer: Prepare Lead Service Line Replacement Summary Report & Submit to DDW for Approval	2.5	218.00	545.00
Subtotal			2,586.00
A service charge of 0.83% per month will be assessed on all past due balances exceeding 60 days. Please remit to above address.		<b>Total</b>	\$2,586.00



**BRACEWELL ENGINEERING, INC**

155 MAST ST., UNIT 114, MORGAN HILL, CA 95037  
 [669] 258-5820 FAX [408] 498-7045  
 www.bracewellengineering.com

**Invoice**

<b>BILL TO</b>
Gary Ledesma Mecchi Water Company 1367 Tofts Dr. San Jose, CA 95131

<b>DATE</b>	<b>INVOICE #</b>
5/31/2021	21-353

	P.O. NO.	TERMS	DUE DATE
		Due on receipt	6/15/2021
DESCRIPTION	QUANTITY	RATE	AMOUNT
<b>MECCHI WATER COMPANY WATER SYSTEM</b>			
<b>EXTRA SERVICES</b>			
May 2021			
Leak Repair			
Ace Hardware - Pipe Clamps for Repair		25.00	25.00
Home Depot - Shark Bite Couplings and PEX Pipe for repair		51.00	51.00
Operations Manager: Review repair of broken pipe with on call	1	131.00	131.00
Operator I: helped repair leak at Sulivans	1	65.00	65.00
Operator I: Fix leak on service line	7	65.00	455.00
Operator I: Service line break, dig out and expose pipe, buy supplies, try to clamp shut. Use pinch kit to pinch line, cut line and reattach with shark bites	8	65.00	520.00
Operator I: fixed break in line at sullivan's	4	65.00	260.00
Operator I: Fix leak, pinch and clamp pipe, cut pipe, install new pipe, undo clamp, backfill	2	65.00	130.00
Subtotal			1,637.00
<b>Lead Service Line Review</b>			
Principal Engineer: Review final potholing results & notify DDW of final letter report outline	0.5	218.00	109.00
Principal Engineer: Start editing final report for DDW	1	218.00	218.00
Principal Engineer: Continue editing final service line inventory report	1	218.00	218.00
Principal Engineer: Finish editing draft service line inventory report & maps	0.5	218.00	109.00
Operations Manager: Review Lead & Copper Rule Report	1	131.00	131.00
Principal Engineer: Respond to EL request for more details of service lines on E Middle	0.5	218.00	109.00
Subtotal			894.00
A service charge of 0.83% per month will be assessed on all past due balances exceeding 60 days. Please remit to above address.		<b>Total</b>	
		\$2,531.00	





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 [669] 258-5820 FAX [408] 498-7045  
 www.bracewellengineering.com

**Invoice**

<b>BILL TO</b>
Gary Ledesma Mecchi Water Company 1367 Tofts Dr. San Jose, CA 95131

<b>DATE</b>	<b>INVOICE #</b>
8/31/2021	21-498

<b>P.O. NO.</b>	<b>TERMS</b>	<b>DUE DATE</b>
	Due on receipt	9/15/2021

DESCRIPTION	QUANTITY	RATE	AMOUNT
<b>MECCHI WATER COMPANY WATER SYSTEM</b>			
<b>EXTRA SERVICES</b>			
August 2021			
Ace Hardware - Hose and Hose Bib Near Chlorine Pump		102.00	102.00
Subtotal			102.00
<b>Leak Response</b>			
Operator I: Respond to report of supply line leak at 20 E Middle.		1	65.00
Operator I: Respond to report from Gary Ledesma about a leak at 14560 Crowner. Address does not exist, I checked at 14561 Crowner, but no sign of water and resident did not report anything. I checked the supply line and found no signs of leaks on Crowner.		1	65.00
Operator I: Respond to Gary Ledesma report of leak at 20 E Middle. Take photos to demonstrate that the property is vacant and inaccessible		1	65.00
Subtotal			195.00
<b>Lead Service Line Replacement Report</b>			
Principal Engineer: Time & effort required to obtain piping certification letter from Jack Ledesma & to email it to DDW for approval		0.5	218.00
Senior Engineer II: prepare draft Lead Service Line Replacement Report as required by DDW		1.75	190.00
Principal Engineer: Review & final edit LSLR Report & submit to DDW		0.5	218.00
Subtotal			550.50
A service charge of 0.83% per month will be assessed on all past due balances exceeding 60 days. Please remit to above address.			
<b>Total</b>			<b>\$847.50</b>



**BRACEWELL ENGINEERING, INC**

155 MAST ST., UNIT 114, MORGAN HILL, CA 95037  
 [669] 258-5820 FAX [408] 498-7045  
 www.bracewellengineering.com

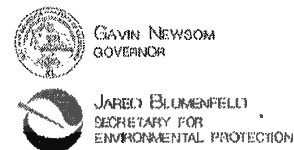
**Invoice**

<b>BILL TO</b>
Gary Ledesma Mecchi Water Company 1367 Tofts Dr. San Jose, CA 95131

<b>DATE</b>	<b>INVOICE #</b>
9/30/2021	21-550

<b>P.O. NO.</b>	<b>TERMS</b>	<b>DUE DATE</b>
	Due on receipt	10/15/2021

DESCRIPTION	QUANTITY	RATE	AMOUNT
<b>MECCHI WATER COMPANY WATER SYSTEM</b>			
<b>EXTRA SERVICES</b>			
September 2021			
Update Bacteriological Site Sampling Plan		400.00	400.00
Subtotal			400.00
Tuesday 09/21/2021			
Home Depot - Pipe Adapter and 12" Pipe to Repair Break		10.00	10.00
Operator I: Fix break in meter box at 14570 Crowner Ave	3	65.00	195.00
Operator I: Help Fix break in meter box at 14570 Crowner Ave	3	65.00	195.00
Subtotal			400.00
Final Lead Service Line Report			
Senior Engineer II: Put together lead service report summary for DDW.	2.25	190.00	427.50
Senior Engineer II: Create draft of lead service line report.	1	190.00	190.00
Senior Engineer II: Finalize and compile lead service line report with attachments	1	190.00	190.00
Principal Engineer: Final edit LSLR report & submit to DDW	1.5	218.00	327.00
Subtotal			1,134.50
A service charge of 0.83% per month will be assessed on all past due balances exceeding 60 days. Please remit to above address.		<b>Total</b>	\$1,934.50



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## State Water Resources Control Board Division of Drinking Water

November 19, 2020

Mr. Gary Ledesma, Owner  
Mecchi Water Company  
1367 Tofts Drive  
San Jose, CA 95131

Dear Mr. Ledesma:

### **USER SERVICE LINE INVENTORY TIMELINE PLAN Mecchi Water Company, Water System No. 4300912**

This letter is in regards to the User Service Line Inventory Timeline Plan (Plan) dated November 16, 2020 and submitted on November 18, 2020 for the Mecchi Water Company (MWC) in response to Citation No. 02\_17\_20C\_013 (citation). Citation was issued to MWC on September 16, 2020 for failure to comply with California Health and Safety Code, Section 116885 which requires community water systems to compile an inventory of user service lines of unknown material and provide a timeline to the State Water Resources Control Board – Division of Drinking Water (Division) by July 1, 2020 for replacement of those user service lines. MWC reported on July 9, 2020 twenty-eight user service lines whose content cannot be determined in its distribution system, however, did not provide a timeline for replacement. In response to the citation, MWC submitted a prior version of the Plan, dated October 8, 2020. The October 8, 2020 plan was not approved by the Division as the investigation proposal did not adequately address all unknown user service line material. Furthermore, the plan did not include a schedule to replace lead pipe material if found during the investigation. MWC was required to submit a revised plan by November 18, 2020.

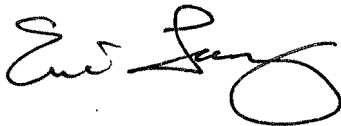
The November 16, 2020 Plan proposed to identify the user service line material in two phases. Phase 1 includes mapping and inventorying the MWC distribution system through the use of a pipe detector instrument that detects steel pipe material, such as galvanized steel. Alignments detected by the instrument will be marked on a Google Earth map. Water main and service lines that cannot be detected will be investigated in Phase 2. Under Phase 2, all service laterals of unknown pipe material will be potholed and the pipe material determined. If any lead was found after potholing the service lateral, the lead pipe material will be replaced with pipe materials meeting NSF/ANSI 61 standards.

E. JOAQUIN ESQUIVEL, CHAIR | EILEEN SOBECK, EXECUTIVE DIRECTOR

The Division has reviewed the Plan and finds it acceptable. MWC must immediately initiate Phase 1 of the Plan and complete the work by **December 4, 2020**. The investigation report and evaluation plan for Phase 2 must be submitted to the Division by **December 11, 2020**. The report must include all raw data from the pipe detector instrument and accompanying field notes taken. All service lateral of unknown material must be potholed under Phase 2 by **December 31, 2020**. If any lead pipe materials are found, MWC must immediately notify the Division and replace all lead material by **January 31, 2021**.

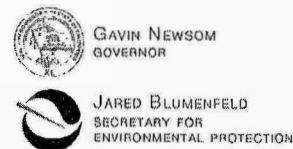
Please submit a signed statement and/or contract between MWC and Bracewell Engineering to complete all elements of the approved Plan by **November 20, 2020**. If you have any questions regarding this letter, please contact Ms. Van Tsang at (510) 620-3602.

Sincerely,

A handwritten signature in black ink, appearing to read 'Eric Lacy', with a large, stylized loop at the end.

Eric Lacy, P.E.  
District Engineer  
Santa Clara District  
Division of Drinking Water  
State Water Resources Control Board

Cc: Santa Clara County Environmental Health Department



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## State Water Resources Control Board

### Division of Drinking Water

September 16, 2020

System No. 4300912

Mr. Gary Ledesma, Co-Owner  
Mecchi Water Company  
1367 Tofts Drive  
San Jose, CA 95131

Mr. Jack Ledesma, Co-Owner  
Mecchi Water Company  
2945 Stable Drive  
West Sacramento, CA 95691

**CITATION NO. 02\_17\_20C\_013**  
**FAILURE TO SUBMIT A TIMELINE FOR REPLACEMENT OF USER SERVICE LINES**  
**WHOSE CONTENT CANNOT BE DETERMINED**  
**FOR 2020**

Enclosed is Citation No. 02\_17\_20C\_013 (hereinafter "Citation"), issued to the Mecchi Water Company (hereinafter "System") public water system. Please note that there are legally enforceable deadlines associated with this Citation.

The System will be billed at the State Water Resources Control Board's (hereinafter "State Water Board") hourly rate for the time spent on issuing this Citation. California Health and Safety Code (hereinafter "CHSC") Section 116577 provides that a public water system must reimburse the State Water Board for actual costs incurred by the State Water Board for specified enforcement actions, including preparing, issuing and monitoring compliance with a citation. At this time, the State Water Board has spent approximately one (1) hour on enforcement activities associated with this violation.

The System will receive a bill sent from the State Water Board in August of the next fiscal year. This bill will contain fees for any enforcement time spent on the System for the current fiscal year.

Any person who is aggrieved by a citation, order or decision issued under authority delegated to an officer or employee of the State Water Board under Article 8 (commencing with CHSC, Section 116625) or Article 9 (commencing with CHSC, Section 116650), of the Safe Drinking Water Act (CHSC, Division 104, Part 12, Chapter 4), may file a petition with the State Water Board for reconsideration of the citation, order or decision.

Petitions must be received by the State Water Board within 30 days of the issuance of the citation, order or decision by the officer or employee of the State Water Board. If the

E. JOAQUIN ESQUIVEL, CHAIR | EILEEN SOBECK, EXECUTIVE DIRECTOR

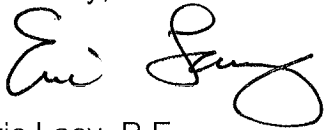
30th day falls on a Saturday, Sunday, or state holiday, the petition is due the following business day by 5:00 p.m.

Information regarding filing petitions may be found at:

[http://www.waterboards.ca.gov/drinking\\_water/programs/petitions/index.shtml](http://www.waterboards.ca.gov/drinking_water/programs/petitions/index.shtml)

If you have any questions regarding this matter, please contact Ms. Van Tsang at (510) 620-3602.

Sincerely,

A handwritten signature in black ink, appearing to read "Eric Lacy". The signature is fluid and cursive, with the first name "Eric" written in a larger, more prominent script than the last name "Lacy".

Eric Lacy, P.E.  
District Engineer  
Santa Clara District  
Division of Drinking Water  
State Water Resources Control Board

Enclosures

Certified Mail No.7018 1130 0001 8433 5641

Cc: Santa Clara County Environmental Health Department

STATE OF CALIFORNIA  
STATE WATER RESOURCES CONTROL BOARD  
DIVISION OF DRINKING WATER

**Name of Public Water System:** Mecchi Water Company

**Water System No:** 4300912

**Attention:** Mr. Gary Ledesma, Co-Owner

1367 Tofts Drive

San Jose, CA 95131

Mr. Jack Ledesma, Co-Owner

2945 Stable Drive

West Sacramento, CA 95691

**Issued:** September 16, 2020

**CITATION FOR NONCOMPLIANCE**  
**CALIFORNIA HEALTH AND SAFETY CODE, SECTION 116885**

**FAILURE TO SUBMIT A TIMELINE FOR REPLACEMENT OF USER SERVICE LINES**  
**WHOSE CONTENT CANNOT BE DETERMINED**

**2020**

The California Health and Safety Code (hereinafter "CHSC"), Section 116650 authorizes the State Water Resources Control Board (hereinafter "State Water Board"), to issue a citation to a public water system when the State Water Board determines that the public water system has violated or is violating the California Safe Drinking Water Act (hereinafter "California SDWA"), (CHSC, Division 104, Part 12, Chapter 4,

commencing with Section 116270), or any regulation, standard, permit, or order issued or adopted thereunder.

The State Water Board, acting by and through its Division of Drinking Water (hereinafter "Division"), and the Deputy Director for the Division, hereby issues Citation No. 02\_17\_20C\_013 (hereinafter "Citation"), pursuant to Section 116650 of the CHSC to the Mecchi Water Company (hereinafter "System"), for violation of CHSC, Section 116885.

### **STATEMENT OF FACTS**

The System is classified as a community public water system with a population of 104 persons, serving 28 connections. The System operates under Domestic Water Supply Permit No. 02-05-43-94P-014 issued by the State Water Board on September 30, 1994. The System is using a groundwater source to supply potable water to the distribution system.

CHSC, Section 116885 requires community water systems to compile an inventory of user service lines of unknown material and provide a timeline to the State Water Board by **July 1, 2020** for replacement of those user service lines.

CHSC, Section 116890 states that a "user service line" has the same meaning as in Title 22, California Code of Regulations (hereinafter "CCR"), Section 64551.60. Title 22, CCR, Section 64551.60 defines "user service line" as "the pipe, tubing, and fittings connecting a water main to an individual water meter or service connection but does not include the service line from the meter to individual homes."

The System submitted a listing of homes served by the water system with the estimated year of construction to the State Water Board on July 9, 2020. The inventory is included



in Appendix 1. The System reported 28 user service lines whose content cannot be determined in its distribution system, but did not provide a timeline for replacement.

To date, the State Water Board has not received the replacement timeline from System.

### DETERMINATION

The State Water Board has determined that the System has failed to comply with the CHSC, Section 116885.

### DIRECTIVES

The System is hereby directed to take the following actions:

- ✓ 1. By **October 10, 2020**, prepare and submit to the State Water Board a proposed timeline and letter to replace all the user service lines whose content cannot be determined. The timeline and letter must be prepared in accordance with the guidelines on the State Water Board's website, using the following websites.
  - Fact Sheet:  
[https://www.waterboards.ca.gov/drinking\\_water/certlic/drinkingwater/documents/lsl\\_faq%202020\\_final.pdf](https://www.waterboards.ca.gov/drinking_water/certlic/drinkingwater/documents/lsl_faq%202020_final.pdf)
  - "Lead Service Line Inventory Requirement for Public Water Systems" website:  
[https://www.waterboards.ca.gov/drinking\\_water/certlic/drinkingwater/lead\\_service\\_line\\_inventory\\_pws.html](https://www.waterboards.ca.gov/drinking_water/certlic/drinkingwater/lead_service_line_inventory_pws.html).
  
2. By **September 25, 2020** complete and return to the State Water Board the "Notification of Receipt" form attached to this Citation as Appendix 2. Completion of this form confirms that the System has received this Citation and understands that it contains legally enforceable directives(s) with due dates.

All submittals required by this Citation, unless otherwise specified in the directives above, must be electronically submitted to the State Water Board at the following address. The subject line for all electronic submittals corresponding to this Citation must include the following information: Water System name and number, citation number and title of the document being submitted.

Eric Lacy, P.E.  
District Engineer  
State Water Resources Control Board  
Division of Drinking Water  
850 Marina Bay Parkway  
Building P, 2<sup>nd</sup> Floor  
Richmond, CA 94804  
Eric.Lacy@waterboards.ca.gov  
DWPDist17@waterboards.ca.gov

The State Water Board reserves the right to make modifications to this Citation as it may deem necessary to protect public health and safety. Such modifications may be issued as amendments to this Citation and shall be effective upon issuance.

Nothing in this Citation relieves the System of its obligation to meet the requirements of the California SDWA (CHSC, Division 104, Part 12, Chapter 4, commencing with Section 116270), or any regulation, standard, permit or order issued or adopted thereunder.

#### **PARTIES BOUND**

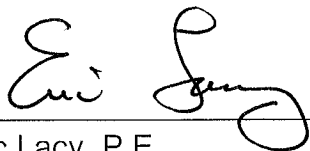
This Citation shall apply to and be binding upon the System, its owners, shareholders, officers, directors, agents, employees, contractors, successors, and assignees.

**SEVERABILITY**

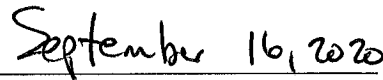
The directives of this Citation are severable, and the System shall comply with each and every provision thereof notwithstanding the effectiveness of any provision.

**FURTHER ENFORCEMENT ACTION**

The California SDWA authorizes the State Water Board to: issue a citation or order with assessment of administrative penalties to a public water system for violation or continued violation of the requirements of the California SDWA or any regulation, permit, standard, citation, or order issued or adopted thereunder including, but not limited to, failure to correct a violation identified in a citation or compliance order. The California SDWA also authorizes the State Water Board to take action to suspend or revoke a permit that has been issued to a public water system if the public water system has violated applicable law or regulations or has failed to comply with an order of the State Water Board, and to petition the superior court to take various enforcement measures against a public water system that has failed to comply with an order of the State Water Board. The State Water Board does not waive any further enforcement action by issuance of this Citation.



Eric Lacy, P.E.  
District Engineer  
State Water Resources Control Board  
Division of Drinking Water



Date

Appendices:

1. Inventory
2. Notification of Receipt Form

Certified Mail No. 7018 1130 0001 8433 5641

## Appendix 1 - Inventory

### Street Address – Year Built

#### Crowner Avenue houses

1. 14428 - 2008
2. 14456 - 1930
3. 14470 - 1930
4. 14484 - 1950
5. 14489 - 1940
6. 14500 - 1920
7. 14514 - 1930
8. 14528 - 1957
9. 14542 - 1946
10. 14556 - 1950
11. 14561 - 1920
12. 14570 - 1945
13. 14575 - 1935
14. 14584 - 1997

#### Monterey Highway houses

15. 14400 - 1999
16. 14408 - 2000
17. 14440 - 1949
18. 14470 - TBD
19. 14480 - TBD
20. 14520-1935
21. 14540-1935
22. 14550 - TBD
23. 14560-1935

#### E. Middle Avenue houses

24. 20 E. Middle - 1935
25. 30 E. Middle - 1935
26. 50 E. Middle - 1935
27. 70 E. Middle - 1946
28. 90 E. Middle - 1935

**Appendix 2 - Notification of Receipt**

**Citation Number:** 02\_17\_20C\_013

**Name of Water System:** Mecchi Water Company

**System Number:** 4300912

**Certification**

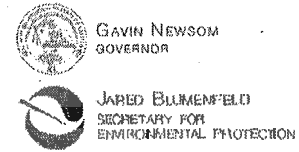
I certify that I am an authorized representative of the Mecchi Water Company and that Citation No. 02\_17\_20C\_013 was received on \_\_\_\_\_. Further I certify that the Citation has been reviewed by the appropriate owners of the Mecchi Water Company and it is clearly understood that Citation No. 02\_17\_20C\_013 contains legally enforceable directives with specific due dates.

\_\_\_\_\_  
Signature of Water System Representative

\_\_\_\_\_  
Date

**THIS FORM MUST BE COMPLETED AND RETURNED TO THE STATE WATER BOARD,  
DIVISION OF DRINKING WATER, NO LATER THAN SEPTEMBER 25, 2020**

**Disclosure:** Be advised that the California Health and Safety Code, Sections 116725 and 116730 state that any person who knowingly makes any false statement on any report or document submitted for the purpose of compliance with the Safe Drinking Water Act may be liable for, respectively, a civil penalty not to exceed five thousand dollars (\$5,000) for each separate violation or, for continuing violations, for each day that violation continues, or be punished by a fine of not more than \$25,000 for each day of violation, or by imprisonment in the county jail not to exceed one year, or by both the fine and imprisonment.



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## State Water Resources Control Board Division of Drinking Water

July 22, 2020

Mr. Gary Ledesma  
Mecchi Water Company  
1367 Tofts Drive  
San Jose, CA 95131

Dear Mr. Ledesma:

### **UNKNOWN/LEAD SERVICE LINE INVENTORY Mecchi Water Company, Water System No. 4300912**

This letter is in regards to the unknown/lead service line inventory requirement for the Mecchi Water Company (Mecchi). California Health and Safety Code, Section 116885 required all community water systems to compile an inventory of known lead user service lines in its distribution system by July 1, 2018. The inventory had to include all user service lines that are active and those that are reasonably expected to become active in the future. In addition, the inventory had to include any areas for which the community water system cannot determine the content of the service line. Community water systems were further required to propose a schedule to replace all the known lead user service lines and user service lines constructed of unknown material by July 1, 2020. According to the Division of Drinking Water's (Division) records, Mecchi currently provides domestic water service to 28 residential connections. Mecchi reported on the 2019 electronic Annual Report to the Division that the user service line material of all 28 connections are unknown. Mecchi failed to submit to the Division, by July 1, 2020, a schedule to replace the service lines of unknown material.

As directed by the Division within the July 8, 2020 email, Mecchi must contract and work with an engineering consulting firm to develop a plan to investigate and determine the material of the user service lines. The plan must be submitted to the Division by **August 8, 2020**. As part of the investigation, Mecchi must pothole at the connection between the water main and user service line at the following addresses to determine the service line material.

- 1) 14470 Monterey Highway
- 2) 14480 Monterey Highway
- 3) 14520 Monterey Highway

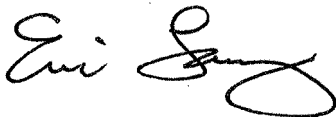
E. JOAQUIN ESQUIVEL, CHAIR | EILEEN SOBECK, EXECUTIVE DIRECTOR

- 4) 14440 Monterey Highway
- 5) 14550 Monterey Highway
- 6) 14456 Crowner Avenue
- 7) 14489 Crowner Avenue
- 8) 14500 Crowner Avenue
- 9) 14514 Crowner Avenue
- 10) 14561 Crowner Avenue
- 11) 20 E. Middle Avenue
- 12) 70 E. Middle Avenue
- 13) 90 E. Middle Avenue

The addresses listed above represent homes constructed within the 1920s to 1940s and homes with an unknown construction date. Please note that if the user service line material of the representative sites is not consistent with other homes within the same decade, additional investigations and potholes may be required. Mecchi must complete all investigation to determine the user service line material by **February 1, 2021**. If lead material is found during the investigation, Mecchi must replace the lead service lines by **December 31, 2022**.

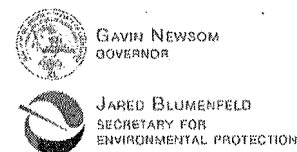
If you have any questions regarding this letter, please contact Ms. Van Tsang at (510) 620-3602.

Sincerely,



Eric Lacy, P.E.  
District Engineer  
Santa Clara District  
Division of Drinking Water  
State Water Resources Control Board

Cc: Santa Clara County Environmental Health Department



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## State Water Resources Control Board Division of Drinking Water

November 4, 2020

Mr. Gary Ledesma, Owner  
Mecchi Water Company  
1367 Tofts Drive  
San Jose, CA 95131

Dear Mr. Ledesma:

### **USER SERVICE LINE INVENTORY TIMELINE Mecchi Water Company, Water System No. 4300912**

This letter is in regards to the Service Line Inventory Timeline proposal letter (letter), dated October 8, 2020, for the Mecchi Water Company (MWC) in response to Citation No. 02\_17\_20C\_013 (citation). Citation was issued to MWC on September 16, 2020 for failure to comply with California Health and Safety Code, Section 116885 which requires community water systems to compile an inventory of user service lines of unknown material and provide a timeline to the State Water Resources Control Board – Division of Drinking Water (Division) by July 1, 2020 for replacement of those user service lines. MWC reported on July 9, 2020 twenty-eight user service lines whose content cannot be determined in its distribution system, however, did not provide a timeline for replacement. The October 8, 2020 letter proposed to identify the user service line material in two phases.

Phase 1 includes mapping and inventorying the MWC distribution system through the use of a pipe detector instrument that detects steel pipe material, such a galvanized steel. Alignments detected by the instrument will be marked on a Google Earth map. Water main and service lines that cannot be detected will be investigated in Phase 2. The investigation will focus on the service laterals serving three houses of unknown age plus at least half of the houses constructed within each decade of the 1920s, 1930s and 1940s, totaling at least 12 houses. If a service lateral was identified in Phase 1 as having a gap of unknown pipe material between the water main and a galvanized service lateral, it will be potholed to identify the pipe material. If a water service lateral could not be found for a given property, geo-phones will be used to locate the pipe through the sound of running water in the underground pipe. The service lateral will then be potholed near the water main to identify the material. If lead material is found after potholing, it will be placed on a list for replacement.

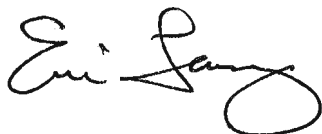
E. JOAQUIN ESQUIVEL, CHAIR | EILEEN SOBECK, EXECUTIVE DIRECTOR



The Division has reviewed the proposal and finds the approach for Phase 1 acceptable. The investigation under Phase 2 however is not adequate. Under Phase 2, all unknown service lateral material must be identified through potholing regardless of the age of the home. Furthermore, the proposal did not include a schedule to replace lead pipe material if found during the investigation. Thus, the proposal does not satisfy the requirements of Section 116885 and therefore not acceptable. By **November 18, 2020**, MWC must submit a proposal that identifies the material of all user service lines and a schedule to replace any lead pipe material.

If you have any questions regarding this letter, please contact Ms. Van Tsang at (510) 620-3602.

Sincerely,

A handwritten signature in black ink, appearing to read "Eric Lacy". The signature is fluid and cursive, with a large loop at the end of the last name.

Eric Lacy, P.E.  
District Engineer  
Santa Clara District  
Division of Drinking Water  
State Water Resources Control Board

Cc: Santa Clara County Environmental Health Department