2021 Consumer Confidence Report

Water System Name:

Lockheed Martin Space Systems Co. #4400801 Report Date:

29 JUN 22

We test the drinking water quality for many constituents as required by state and federal regulations. This report shows the results of our monitoring for the period of January 1 to December 31, 2019 and may include earlier monitoring data.

Este informe contiene información muy importante sobre su agua para beber. Favor de comunicarse Lockheed Martin Santa Cruz Water System, 16020 Empire Grade Road, Santa Cruz, California or (831)426-9005 para asistirlo en español.

Type of water source(s) in use:

Surface Water Collection: Lake/Reservoir

Name & general location of source(s):

Mill Creek Reservoir

Located on Lockheed Martin property at 16020 Empire Grade Road, Santa Cruz, California

Drinking Water Source Assessment information:

The LMS-SCF water system is maintained and monitored solely for the constituents associated with the operations and functions of the site and is considered "Non Vulnerable". A certified Sanitary Survey was completed in 2019 for the recent major construction to the SCF water treatment center. See the contact listed below to obtain a copy of the last Sanitary Survey.

Time and place of regularly scheduled board meetings for public participation:

No scheduled meetings – customer communications provided via ad hoc all hand meetings (last AH: 1/27/2021) and informational updates delivered via email as needed (last email: 2/11/2021)

For more information, contact:

Tim McNulty

Phone:

(831) 425-6009

TERMS USED IN THIS REPORT

Maximum Contaminant Level (MCL): The highest level of a contaminant that is allowed in drinking water. Primary MCLs are set as close to the PHGs (or MCLGs) as is economically and technologically feasible. Secondary MCLs are set to protect the odor, taste, and appearance of drinking water.

Maximum Contaminant Level Goal (MCLG): The level of a contaminant in drinking water below which there is no known or expected risk to health. MCLGs are set by the U.S. Environmental Protection Agency (U.S. EPA).

Public Health Goal (PHG): The level of a contaminant in drinking water below which there is no known or expected risk to health. PHGs are set by the California Environmental Protection Agency.

Maximum Residual Disinfectant Level (MRDL): The highest level of a disinfectant allowed in drinking water. There is convincing evidence that addition of a disinfectant is necessary for control of microbial contaminants.

Maximum Residual Disinfectant Level Goal (MRDLG): The level of a drinking water disinfectant below which there is no known or expected risk to health. MRDLGs do not reflect the benefits of the use of disinfectants to control microbial contaminants.

Primary Drinking Water Standards (PDWS): MCLs and MRDLs for contaminants that affect health along with their monitoring and reporting requirements, and water treatment requirements.

Secondary Maximum Contaminant Level (SMCL): SMCLs are for contaminants that affect taste, odor, or appearance of the drinking water. Contaminants with SMCLs are addressed as Secondary Drinking Water Standards (SDWSs) based upon aesthetic concerns and do not affect your health.

Treatment Technique (TT): A required process intended to reduce the level of a contaminant in drinking water.

Regulatory Action Level (AL): The concentration of a contaminant which, if exceeded, triggers treatment or other requirements that a water system must follow.

Variances and Exemptions: Permissions from the State Water Resources Control Board (State Board) to exceed an MCL or not comply with a treatment technique under certain conditions.

Level 1 Assessment: A Level 1 assessment is a study of the water system to identify potential problems and determine (if possible) why total coliform bacteria have been found in our water system.

Level 2 Assessment: A Level 2 assessment is a very detailed study of the water system to identify potential problems and determine (if possible) why an E. coli MCL violation has occurred and/or why total coliform bacteria have been found in our water system on multiple occasions.

ND: not detectable at testing limit

MFL: million fibers per liter

NTU: Nephelometric Turbidity Units

pCi/L: picocuries per liter (a measure of radiation)

Uni	Equivalence	
mg/L - milligrams per liter	ppm – parts per million	1 second in 11.5 days
μg/L – micrograms per liter	ppb – parts per billion	1 second in nearly 32 years
ng/L – nanograms per liter	ppt – parts per trillion	1 second in nearly 32,000 years
pg/L – picogram per liter	ppq – parts per quadrillion	1 second in nearly 32,000,000 years

The sources of drinking water (both tap water and bottled water) include rivers, lakes, streams, ponds, reservoirs, springs, and wells. As water travels over the surface of the land or through the ground, it dissolves naturally-occurring minerals and, in some cases, radioactive material, and can pick up substances resulting from the presence of animals or from human activity.

Contaminants that may be present in source water include:

- Microbial contaminants, such as viruses and bacteria, that may come from sewage treatment plants, septic systems, agricultural livestock operations, and wildlife.
- Inorganic contaminants, such as salts and metals, that can be naturally-occurring or result from urban stormwater runoff, industrial or domestic wastewater discharges, oil and gas production, mining, or farming.
- Pesticides and herbicides, that may come from a variety of sources such as agriculture, urban stormwater runoff, and residential uses.
- Organic chemical contaminants, including synthetic and volatile organic chemicals, that are byproducts of
 industrial processes and petroleum production, and can also come from gas stations, urban stormwater runoff,
 agricultural application, and septic systems.
- Radioactive contaminants, that can be naturally-occurring or be the result of oil and gas production and mining activities.

In order to ensure that tap water is safe to drink, the U.S. EPA and the State Board prescribe regulations that limit the amount of certain contaminants in water provided by public water systems. The U.S. Food and Drug Administration regulations and California law also establish limits for contaminants in bottled water that provide the same protection for public health.

UNSAFE WATER ALERTS:

The 2020 CZU Complex Fire impacted the facility source water, increasing the concentration of organics at the lake. Additionally, the fire has had an impact upon the treatment facility and the distribution system. As a result, the SWRCB has required issuance of an Unsafe Drinking Water Alert, Do not drink, Do not boil water for the facility. During the year, coliform was detected in a single sample. As required, immediate resampling occurred at the positive sample location and no additional Coliform contamination was detected. The facility collected annual lead and copper samples from the distribution system in September 2021 (Table 2), which were reported to contain lead in one sample over the drinking water standard, requiring a drinking water notification. Drinking water treated with chlorine retains a protective residual, that residual in the presence of natural occurring organics can react creating a "disinfection byproduct". Three samples in 2021 contained a disinfection byproducts, HAA5, exceeded the allowable limit. The SWRCB and the LM treatment team are working to mitigate any additional HAA5 exceedances. The water treatment system remains online to support plumbing infrastructure and fire suppression systems only, until the Unsafe Water Alert is lifted by the SWRCB. This report is a snapshot of last year's water quality. Included are details about where your water comes from, what it contains, and how it compares to State standards. We are committed to providing you with information because informed customers are our best allies.

Tables 1, 2, 3, 4, 5, and 6 list all of the drinking water constituents that were detected during the most recent sampling. The presence of these contaminants in the water does not necessarily indicate that the water poses a health risk. The State Board allows us to monitor for certain contaminants less than once per year because the concentrations of these contaminants do not change frequently. Some of the data, though representative of the water quality, are more than one year old. Any violation of an AL, MCL, MRDL, or TT is highlighted. Additional information regarding the violation is provided later in this report.

Microbiological Contaminants (complete if bacteria detected)	Highest No. of Detections	No. of Months in Violation	MCL	MCLG	Typical Source of Bacteria
Total Coliform Bacteria (state Total Coliform Rule)	1	0	1 positive monthly sample	<1.0	Naturally present in the environment
Fecal Coliform or <i>E. coli</i> (state Total Coliform Rule)	0	0	A routine sample and a repeat sample are total coliform positive, and one of these is also fecal coliform or <i>E. coli</i> positive	<1.0	Human and animal fecal waste
E. coli (federal Revised Total Coliform Rule)	0	0	(a)	<1.0	Human and animal feca waste

(a) Routine and repeat samples are total coliform-positive and either is E. coli-positive or system fails to take repeat samples following E. coli-positive routine sample or system fails to analyze total coliform-positive repeat sample for E. coli.

Lead and Copper (complete if lead or copper detected in the last sample set)	Sample Date	No. of Samples Collected	90 th Percentile Level Detected	No. Sites Exceeding AL	AL	PHG	No. of Schools Requesting Lead Sampling	Typical Source of Contaminant
Lead (ppb)	09/16/2021	5	35	1	15	200	Not applicable	Internal corrosion of household water plumbing systems; discharges from industrial manufacturers; erosion of natural deposits
Copper (ppm)	09/16/2021	5	0.0785	0	1.3	0.3	Not applicable	Internal corrosion of household plumbing systems; erosion of natural deposits; leaching from wood preservatives

Chemical or Constituent (and reporting units)	Sample Date	Level Detected	Range of Detections	MCL	PHG (MCLG)	Typical Source of Contaminant
Sodium (ppm)	11/17/2021	9.8 mg/L (source water)	9.9-12	None	None	Salt present in the water and is generally naturally occurring
Hardness (ppm)	11/17/2021	63 mg/L (source water)	43-52	None	None	Sum of polyvalent cations present in the water, generally magnesium and calcium, and are usually naturally occurring

^{*}The State allows monitoring for some contaminants less than once per year because the concentrations of these contaminants do not change frequently. Some of our data, though representative, is more than one year old.

TABLE 4 – DE	TECTION OF	CONTAMINA	NTS WITH A P	RIMARY I	RINKING '	WATER STANDARD
Chemical or Constituent (and reporting units)	Sample Date	Level Detected	Range of Detections	MCL [MRDL]	PHG (MCLG) [MRDLG]	Typical Source of Contaminant
Gross Alpha Particle Activity (pCi/L)	11/08/2017	0.835	0.098-0.835	15	(0)	Erosion of natural deposits
Total Radium (pCi/L)	11/08/2017	0.322	0-0.322	5	N/A	Erosion of natural deposits
Uranium (pCi/L)	12/17/2020	1	1	20	0.43	Erosion of natural deposits
Aluminum (mg/L)	11/17/2021	ND	0.025-0.048	1	0.6	Erosion of natural deposits; residue from some surface water treatment processes
Antimony (ug/L)	11/17/2021	ND	0.5	6	1	Discharge from petroleum refineries; fire retardants; ceramics; electronics solder

Arsenic (ug/L)	11/17/2021	ND	0.52-1.7	10	0.004	Erosion of natural deposits; runoff from orchards; runoff from glass & electronics production wastes
Asbestos (MFL)	11/08/2017	0	0	7	7	Decay of asbestos cement in water mains; erosion of natural deposits
Barium (mg/L)	11/17/2021	ND	0.024-0.036	2	1	Discharge of drilling wastes: discharge from metal refineries; erosion of natural deposits.
Beryllium (ug/L)	09/29/2020	1	1	4	1	Discharge from metal refineries and coal-burning factories; discharge from electrical, aerospace, and defense industries
Cadmium (ug/L)	11/17/2021	ND	0.2-0.4	5	0.04	Corrosion of galvanized pipes; erosion of natural deposits; discharge from metal refineries; runoff from waste batteries and paints
Chromium (Total) (ug/L)	11/17/2021	ND	0.4-0.61	50	(100)	Discharge from steel and pulp mills; erosion of natural deposits
Cyanide (ug/L)	11/17/2021	ND	50	150	150	Discharge from steel/metal factories; discharge from plastics and fertilizer factories
Fluoride (F) (Natural- Source) (mg/L)	11/17/2021	ND	0.1-0.14	2	1	Erosion of natural deposits: discharge from fertilizer and aluminum factories
Mercury (ug/L)	11/17/2021	ND	0.05-0.2	2	1.2	Erosion of natural deposits; discharge from refineries and factories; runoff from landfills and croplands
Nickel (ug/L)	11/17/2021	ND	5-10	100	12	Erosion of natural deposits; discharge from metal factories
Nitrate (Measured as Nitrogen) (mg/L)	11/17/2021	ND	0.1	10	10	Runoff from fertilizer use; leaching from spectic tanks, sewage; erosion of natural deposits
Nitrite (Measured as Nitrogen) (mg/L)	11/17/2021	ND	0.1	1	1	Runoff from fertilizer use; leaching from spectic tanks, sewage; erosion of natural deposits
Perchlorate (ug/L)	06/11/2020	ND	0-4	6	1	Used in solid rocket propellant, fireworks, explosives, flares, matches, and a variety of industries; discharge from historic aerospace or other industrial operations that used or use, store, or dispose of perchlorate and its salts.
Selenium (ug/L)	11/17/2021	ND	0.5-1	50	30	Discharge from petroleum and metal refineries; erosion of natural deposits; discharge from mines
Thallium (ug/L)	11/17/2021	ND	0.4-0.5	2	0.1	Leaching from ore-processing sites; discharge from electronics, glass, and drug factories
Carbofuran (ug/L)	04/16/2013	5	5	18	0.7	Leaching from soil fumigant used on rice and alfalfa, and grape vineyards
1,2,3-Trichloropropane (1,2,3-TCP) (ug/L)	11/14/2018	ND	ND	0.005	0.0007	Discharge from industrial and agricultural chemical factories; leaching from hazardous waste sites; used as cleaning and maintenance solvent, paint and varnish remover, and cleaning and degreasing agent;
						byproduct during the production of other compounds and pesticides.
Haloacetic Acids (5) (HAA5) (ug/L)	Quarterly 2021	77	14-77	60	N/A	Byproduct of drinking water disinfection
Total Trihalomethanes (ug/L)	Quarterly 2021	68	44-68	80	N/A	Byproduct of drinking water disinfection

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Chemical or Constituent (and reporting units)	Sample Date	Level Detected	Range of Detections	SMCL	PHG (MCLG)	Typical Source of Contaminant
Aluminum (ug/L)	11/17/2021	ND	25-48	200	N/A	Erosion of natural deposits; residue from some surface water treatment processes
Chloride (mg/L)	11/17/2021	11	11-13	500	N/A	Runoff/leaching from natural deposits; seawater influence
Color (units)	11/17/2021	3	4-40	15	N/A	Naturally occurring organic materials
Foaming Agents (MBAS) (ug/L)	11/17/2021	ND	25	500	N/A	Municipal and industrial waste discharges
Iron (ug/L)	11/17/2021	ND	71-990	300	N/A	Leaching from natural deposits; industrial wastes
Manganese (ug/L)	11/17/2021	ND	24-390	50	N/A	Leaching from natural deposits
Odor Threshold @ 60 C (units)	11/17/2021	ND	1-33	3	N/A	Naturally occurring organic materials
Silver (ug/L)	11/17/2021	ND	0.2-10	100	N/A	Industrial discharges
Specific Conductance (uS/cm)	11/17/2021	190	130-190	1600	N/A	Substances that form ions when in water; seawater influence
Sulfate (mg/L)	11/17/2021	12	5-12	500	N/A	Runoff/leaching from natural deposits; industrial wastes
Total Dissolved Solids (mg/L)	11/17/2021	110	86-110	1000	N/A	Runoff/leaching from natural deposits
Turbidity, Laboratory (NTU)	11/17/2021	0.20	0.2-4.5	5	N/A	Soil Runoff
Zinc (mg/L)	11/17/2021	ND	0.01-0.033	5	N/A	Runoff leaching from natural deposits; industrial wastes

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	TABLE 6	- DETECTION	OF UNREGUL	ATED CONTAMINAL	NTS
Chemical or Constituent (and reporting units)	Sample Date	Level Detected	Range of Detections	Notification Level	Health Effects Language
Boron (mg/L)	11/17/2021	ND	0.02-0.1	1.0	Boron exposures resulted in decreased fetal weight (developmental effects) in newborn rats.

Additional General Information on Drinking Water

Drinking water, including bottled water, may reasonably be expected to contain at least small amounts of some contaminants. The presence of contaminants does not necessarily indicate that the water poses a health risk. More information about contaminants and potential health effects can be obtained by calling the U.S. EPA's Safe Drinking Water Hotline (1-800-426-4791).

Some people may be more vulnerable to contaminants in drinking water than the general population. Immuno-compromised persons such as persons with cancer undergoing chemotherapy, persons who have undergone organ transplants, people with HIV/AIDS or other immune system disorders, some elderly, and infants can be particularly at risk from infections. These people should seek advice about drinking water from their health care providers. U.S. EPA/Centers for Disease Control (CDC) guidelines on appropriate means to lessen the risk of infection by *Cryptosporidium* and other microbial contaminants are available from the Safe Drinking Water Hotline (1-800-426-4791).

Lead-Specific Language: If present, elevated levels of lead can cause serious health problems, especially for pregnant women and young children. Lead in drinking water is primarily from materials and components associated with service lines and home plumbing. Lockheed Martin Water System #4400801 is responsible for providing high quality drinking water but cannot control the variety of materials used in plumbing components. When your water has been sitting for several hours, you can minimize the potential for lead exposure by flushing your tap for 30 seconds to 2 minutes before using water for drinking or cooking. [OPTIONAL: If you do so, you may wish to collect the flushed water and reuse it for another beneficial purpose, such as watering plants.] If you are concerned about lead in your water, you may wish to have your water tested. Information on lead in drinking water, testing methods, and steps you can take to minimize exposure is available from the Safe Drinking Water Hotline (1-800-426-4791) or at http://www.epa.gov/lead.

Unregulated Contaminants: Boron is a non-metallic, naturally-occurring, element found in rocks, soil, and water. Boron compounds are used primarily in the production of glass and ceramics, pesticides, fire retardants, plus insulation-grade- and textile-grade-glass fibers. Boron can be present in commercial plant foods and fertilizers and are often found in household laundry and cleaning products. Boron contamination in water can come directly from industrial waste water and municipal sewage, as well as indirectly from air deposition and soil runoff. The federal government does not regulate boron in drinking water, but the state of California requires public drinking water systems to monitor for the contaminant and notify consumers if the contaminant exceeds the notification level (NL).

For Systems Providing Surface Water as a Source of Drinking Water

Treatment Technique (a) (Type of approved filtration technology used)	Direct Media Filtration			
	Turbidity of the filtered water must:			
Turbidity Performance Standards (b)	1 – Be less than or equal to 0.20 NTU in 95% of measurements in a month.			
(that must be met through the water treatment process)	2 - Not exceed 0.20 NTU for more than eight consecutive hours.			
	3 - Not exceed 0.20 NTU at any time.			
Lowest monthly percentage of samples that met Turbidity Performance Standard No. 1.	All samples met Turbidity Performance Standard No. 1; 100% is the lowest monthly percentage of operating sample test results which met turbidity performance standard No. 1.			
Highest single turbidity measurement during the year	0.097 NTU on 13 JAN 20			
Number of violations of any surface water treatment requirements	(1) Haloacetic Acids (5) sample concentration exceeded maximum contaminant level (MCL). LM in conjunction with the State Water Resources Control Board is working to conduct an Operation Evaluation (OE) to ascertain why HAA5 values have exceeded the MCL. Based on the initial data, it appears the increase in HAA5s is a result of some phenomena associated with the CZU Fire. LM remains on a Unsafe Drinking Water, Do Not Drink, Do Not Boil Water Advisory Notice.			

- (a) A required process intended to reduce the level of a contaminant in drinking water.
- (b) Turbidity (measured in NTU) is a measurement of the cloudiness of water and is a good indicator of water quality and filtration performance. Turbidity results which meet performance standards are considered to be in compliance with filtration requirements.

Haloacetic Acids (HAA5) are a group of organic chemicals that often occur in drinking water as a result of chlorine treatment for disinfectant purposes and, therefore, are also known as "disinfection byproducts" or DBPs. HAA5 is formed when chlorine reacts with naturally occurring organic material found in water such as decaying vegetation. Some people who drink water containing HAA5 in excess of the MCL over many years may have an increased risk of getting cancer.

Summary Information for Violation of a Surface Water TT

		VIOLATION OF A SURF	ACE WATER TT	
TT Violation	Explanation	Duration	Actions Taken to Correct the Violation	Health Effects Language
Compliance Order No. 02-05-19R_001	Failure to meet disinfection requirements of surface water treatment rule	Compliance Order issued 8/14/2019 – Boil Water Advisory to remain in effect until compliant system designed with 2017 compliance order is permitted.	Distributed Boil Water Advisory (BWA) notice to all persons onsite; continued with quarterly BWA notifications; Submitted certification of public notice and notice of receipt to SWRCB; continue with construction and installation of new system.	Inadequately treated water may contain disease-causing organisms. These organisms include bacteria, viruses, and parasites that can cause symptoms such as nausea, cramps, diarrhea, and associated headaches.
Compliance Order No. 02-05-17R-004	Inadequate pre- treatment (Flocculation) for direct filter water treatment system	Compliance Order issued 8/3/2017 – ECD for completion of system construction is 12/31/2019. ECD for SWRCB permit issuance 09/30/2020. New treatment facility construction completed. New permit application submitted to SWRCB. CZU Fire assessment and return to online and approval from SWRCB in work.	Submitted draft copy of notifications to SWRCB and delivered customer notifications; contracted with design engineer for modifications; delivered Corrective Action Plan to SWRCB; Capital Expense project initiated; Construction activities completed; Trial treatment testing results submitted to SWRCB; New permit application filed with SWRCB; Final SWRCB inspection pending	No adverse health effects due to this Compliance Order of pre-treatment requirements.

Summary Information for Operating Under a Variance or Exemption

Since the issuance of compliance order No. 02-05-19R_001 and the Boil Water Advisory, all potable water being supplied to all persons onsite is through the procurement of bottled water. The treatment facility water is being used only for non-potable water fixtures and fire suppression demands. The treatment facility has continued with all sampling and testing as required by all drinking water treatment systems. And the water quality sampling and laboratory results for bacteriological presence demonstrates that the water treatment plant is producing water quality that meets the State criteria for drinking water, suitable for human consumption.

How to Report Issues/Concerns

As a drinking water supplier, committed to providing all employees, contractors and SCF visitors with high quality drinking water, we want to hear from you. If you have compliments, questions, or concerns about the quality of your water please use the resources available to notify ESH. Urgent high priority issues can be called in using the ESH Hotline (408-742-7215) or via radio. (In the event of an emergency, please dial 911 from an in-plant phone.) All other inquires can be submitted through the OSEE webpage https://space-internalus.p.external.lmco.com/sites/sscesh/Pages/Ask-OSEE.aspx. All questions and complaints will be recorded and investigated, and resolved in a timely manner. If you are experiencing a water outage, please contact FO&S immediately via LM Buildings as a corrective maintenance request or via email or radio.

Consumer Confidence Report Certification Form

(To be submitted with a copy of the CCR)

Water System Name:	Lockheed Martin Space Systems Co.
Water System Number:	#4400801
customers (and appropr contained in the report is	d above hereby certifies that its Consumer Confidence Report was distributed on July 1, 2019 to riate notices of availability have been given). Further, the system certifies that the information is correct and consistent with the compliance monitoring data previously submitted to the State of Board, Division of Drinking Water (DDW).
Certified by: Name:	ure: Tm Mch
Title:	Facilities Manager
Phone	Number:(831)425-6009
apply and fill-in where a copy of the Capter and copy of the capter and capte	ed by mail or other direct delivery methods (attach description of other direct delivery methods ed using electronic delivery methods described in the Guidance for Electronic Delivery of the nice Report (water systems utilizing electronic delivery methods must complete the second page). It is were used to reach non-bill paying consumers. Those efforts included the following methods: CCR at the following Internal Server link: (intranet location) dfs\SCFGroups\Facility\Water Treatment and Distribution\CCRs\2021_CCR_7.1.22 CCR to postal patrons within the service area (attach zip codes used) the availability of the CCR in news media (attach copy of press release) of the CCR in a local newspaper of general circulation (attach a copy of the published notice, time of newspaper and date published) CR in public places (attach a list of locations) Bldg. notification boards and break rooms multiple copies of CCR to single-billed addresses serving several persons, such as apartments,
	g at least 100,000 persons: Posted CCR on a publicly-accessible internet site at the following
URL: www.	, s. read. 100,000 persons. I osed extrem a publicly-accession memor site at the following
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Consumer Confidence Report Electronic Delivery Certification

	er systems utilizing electronic distribution methods for CCR delivery must complete this page by checking all items apply and fill-in where appropriate.
	Water system mailed a notification that the CCR is available and provides a direct URL to the CCR on a publicly available website where it can be viewed (attach a copy of the mailed CCR notification). URL: www
	Water system emailed a notification that the CCR is available and provides a direct URL to the CCR on a publicly available site on the Internet where it can be viewed (attach a copy of the emailed CCR notification). URL: www
\boxtimes	Water system emailed the CCR as an electronic file email attachment.
	Water system emailed the CCR text and tables inserted or embedded into the body of an email, not as an attachment
	(attach a copy of the emailed CCR).
	Requires prior DDW review and approval. Water system utilized other electronic delivery method that meets the direct delivery requirement.
	ide a brief description of the water system's electronic delivery procedures and include how the water system res delivery to customers unable to receive electronic delivery.
	tomers of the LM Space-SCF Water System are on the electronic email delivery roster. Copies are posted
	are available for each customer upon request
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This form is provided as a convenience and may be used to meet the certification requirement of section 64483(c) of the California Code of Regulations.