

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
LAHONTAN REGION

In the matter of:)
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Susanville)
Sanitary District)
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Order No. 56T-2020-0055
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Settlement Agreement and Stipulation for Order
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Entry of Order
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Section I: INTRODUCTION

This Settlement Agreement and Stipulation for Entry of Administrative Civil Liability Order (Settlement Agreement and Stipulation for Order) is entered into by and between the California Regional Water Quality Control Board, Lahontan Region Prosecution Team (Prosecution Team) and the Susanville Sanitary District (District) (collectively, "Parties"), and is presented to the California Regional Water Quality Control Board, Lahontan Region (Lahontan Water Board), for adoption as an Order, by settlement, pursuant to Government Code section 11415.60.

Section II: RECITALS

1. The District owns and operates a wastewater treatment plant that serves the City of Susanville. An average of 2 million gallons per day of secondary treated disinfected wastewater is permitted to be discharged to an irrigation ditch system. Effluent is then used to irrigate rangeland before discharging into Jensen Slough, a tributary to the Susan River.
2. On July 23, 2008, the Lahontan Water Board adopted Waste Discharge Requirements (WDR) Order No. R6T-2008-0022 (NPDES CA0102695) which includes effluent limitations and other requirements regarding the discharge. On October 10, 2012, the Lahontan Water Board adopted Order No. R6T-2008-0022-A01 which changed the point of compliance for total coliform and total suspended solids to reflect changes based on construction of an upgraded filtration process and a new ultraviolet (UV) disinfection system.
3. On January 5, 2011, the Assistant Executive Officer of the Lahontan Water Board issued Administrative Civil Liability Complaint No. R6T-2011-0002 to the District, seeking to impose \$453,000 in Mandatory Minimum Penalties (MMPs) for alleged effluent limitation violations that occurred between September 3, 2008 and September 30, 2010. On January 13, 2011, the District waived its right to a hearing within 90 days in order to implement a compliance project to address the violations.

4. On February 24, 2020, the Prosecution Team issued a Notice of Violation (NOV) to the District. The NOV describes alleged effluent limitation violations which occurred between October 1, 2010 and November 30, 2019. These alleged violations are subject to \$273,000 in MMPs. During settlement discussions, the Prosecution Team reviewed the District's recent monitoring reports and extended the period of review to June 30, 2020. There were no additional effluent limitation violations.
5. In total, the District is subject to \$726,000 in MMPs for effluent limitation violations that took place between September 3, 2008 and June 30, 2020.
6. The District timely responded to the NOV, stating that it did not contest the effluent limitation violations and requesting that \$723,000 of the penalty be applied to the compliance project. The District also stated that it would pay the remaining \$3,000 penalty.
7. Water Code section 13385, subdivisions (h) and (i) require assessment of mandatory penalties and state, in part, the following:

Water Code section 13385, subdivision (h)(1) states:

Notwithstanding any other provision of this division, and except as provided in subdivisions (j), (k), and (l), a mandatory minimum penalty of three thousand dollars (\$3,000) shall be assessed for each serious violation.

Water Code section 13385, subdivision (h)(2) states:

For the purposes of this section, a "serious violation" means any waste discharge that violates the effluent limitation contained in the applicable waste discharge requirements for a Group II pollutant, as specified in Appendix A to Section 123.45 of Title 40 of the Code of Federal Regulations, by 20 percent or more or for a Group I pollutant, as specified in Appendix A to Section 123.45 of Title 40 of the Code of Federal Regulations, by 40 percent or more.

Water Code section 13385, subdivision (i)(1) states, in part:

Notwithstanding any other provision of this division, and except as provided in subdivisions (j), (k), and (l), a mandatory minimum penalty of three thousand dollars (\$3,000) shall be assessed for each violation whenever the person does any of the following four or more times in any period of six consecutive months, except that the requirement to assess the mandatory minimum penalty shall not be applicable to the first three violations:

- (A) Violates a waste discharge requirement effluent limitation.
- (B) Fails to file a report pursuant to Section 13260.
- (C) Files an incomplete report pursuant to Section 13260.

(D) Violates a toxicity effluent limitation contained in the applicable waste discharge requirements where the waste discharge requirements do not contain pollutant-specific effluent limitations for toxic pollutants.

8. Water Code section 13385.1 (a)(1) states “for the purposes of subdivision (h) of section 13385, a ‘serious violation’ also means a failure to file a discharge monitoring report required pursuant to section 13383 for each complete period of 30 days following the deadline for submitting the report, if the report is designed to ensure compliance with limitations contained in waste discharge requirements that contain effluent limitations.”
9. WDR Order No. R6T-2008-0022, Effluent Limitations and Discharge Specifications IV.A.1.c. includes, in part, the following effluent limitations:
 - c. The Discharger shall maintain compliance with the following effluent limitations at Discharge Point 001...

Constituent	Units	Effluent Limitations				
		Average Monthly	Average Weekly	Maximum Daily	Instantaneous Minimum	Instantaneous Maximum
Total Suspended Solids	mg/L	30	45	--	--	
	lbs/day	500	751	--	--	
pH	pH units	--	--	--	6.5	8.5
Removal efficiency for BOD and TSS	%	85				
Residual Chlorine	mg/L	0.01	--	--	0.02	0.02

10. WDR Order No. R6T-2008-0022, Effluent Limitations and Discharge Specifications IV.A.2 states “The Discharger must meet the California Code of Federal Regulations, Title 22 for “Disinfected secondary-23 recycled water”, recycled water that has been oxidized and disinfected so that the median concentration of total coliform bacteria in the disinfected effluent does not exceed a most probable number (MPN) of 23 per 100 milliliters utilizing the bacteriological results of the last seven days for which analyses have been completed, and the number of total coliform bacteria does not exceed an MPN of 240 per 100 milliliters in more than one sample in any 30 day period.”

11. According to the District's self-monitoring reports, the District committed sixteen (16) serious violations for Group I constituents contained in WDR Orders No. R6T-2008-0022 and No. R6T-2008-0022-A01 between September 3, 2008 and June 30, 2020. The violations are defined as serious because measured concentrations of Group I constituents exceeded maximum prescribed levels by more than 40 percent. The mandatory minimum penalty for these 16 serious violations is forty-eight thousand dollars (\$48,000).
12. According to the District's self-monitoring reports, the District committed twenty-three (23) serious violations for Group II constituents contained in WDR Orders No. R6T-2008-0022 and No. R6T-2008-0022-A01 between September 3, 2008 and June 30, 2020. The violations are defined as serious because measured concentrations of Group II constituents exceeded maximum prescribed levels by more than 20 percent. The mandatory minimum penalty for these 23 serious violations is sixty-nine thousand dollars (\$69,000).
13. According to the District's self-monitoring reports, the District committed two hundred and three (203) non-serious (chronic) violations of the above effluent limitations contained in WDR Orders No. R6T-2008-0022 and No. R6T-2008-0022-A01 between September 3, 2008 and June 30, 2020. Two hundred and two (202) violations are subject to mandatory penalties because these violations were preceded by three or more similar violations within a six-month period. The mandatory minimum penalty for these 202 non-serious (chronic) violations is six hundred and six thousand dollars (\$606,000).
14. The District submitted one late self-monitoring report during the period of September 3, 2008 to June 30, 2020. Because this report was designed to ensure compliance with the effluent limitations in WDR Orders No. R6T-2008-0022 and No. R6T-2008-0022-A01, each complete period of 30-days following the submittal deadline is a serious violation subject to mandatory penalties. There was one (1) 30-day period following the submittal deadline; therefore, the mandatory penalty for the late report is three thousand dollars (\$3,000).
15. The total amount of mandatory minimum penalties assessed for the cited effluent limitation violations is **seven hundred twenty-six thousand dollars (\$726,000)**. A detailed list of the effluent limitation violations is included in Attachments A and B, a part of this Order. This Order addresses administrative civil liability for violations that are specifically listed in Attachments A and B as subject to mandatory minimum penalties.
16. Water Code section 13385, subdivision (k) states:
 1. In lieu of assessing all or a portion of the mandatory minimum penalties pursuant to subdivisions (h) and (i) against a publicly owned treatment works serving a small community, the state board or the regional board may elect to require the publicly owned treatment works to spend an equivalent amount towards the

completion of a compliance project proposed by the publicly owned treatment works, if the state board or regional board finds all of the following:

- a. The compliance project is designed to correct the violations within five years.
 - b. The compliance project is in accordance with the enforcement policy of the state board, excluding any provision in the policy that is inconsistent with this section.
 - c. The publicly owned treatment works has prepared a financing plan to complete the project.
2. For the purposes of this subdivision, “a publicly owned treatment works serving a small community” means a publicly owned treatment works serving a population of 10,000 persons or fewer or a rural county, with a financial hardship as determined by the state board after considering such factors as median income of the residents, rate of unemployment, or low population density in the service area of the publicly owned treatment works.
17. The State Water Resources Control Board (State Water Board) Water Quality Enforcement Policy, effective May 20, 2010, delegates to the regional boards the authority to determine whether a publicly owned treatment works serves a small community with financial hardship. On April 15, 2020, the Prosecution Team determined that the Susanville Sanitary District’s service area meets the definition of a small community with a financial hardship.
18. In March 2009, the District began the process of obtaining funding to complete a compliance project designed to correct the total settleable solids, residual chlorine, total coliform organisms, and pH violations within five years. The compliance project included construction of a traveling bridge filter, UV disinfection, a coagulant dosing station, and an emergency chlorination dosing station. The District received a \$1.39 million grant from the Clean Water State Revolving Fund and expended \$1.39 million of its own funds on the project. The upgrades were brought online in March 2012, but warranty issues were not resolved until March 2015.
19. The improvements described in Finding 18 qualify as a compliance project within the meaning of CWC 13385 (k) because the violations were corrected within five years, the project was completed in accordance with the Water Quality Enforcement Policy, and the District prepared a financing plan to complete the project. Upon completion of the compliance project, the District has complied with the effluent limitations for total settleable solids, residual chlorine, and total coliform organisms. There has been one pH violation since completion of the compliance project, but this violation is not subject to mandatory penalties because it is not the fourth violation in a six-month period.
20. The late report violation (\$3,000 in mandatory penalties) cannot be credited toward the compliance project.

Section III: STIPULATIONS

The Parties stipulate to the following:

21. **Administrative Civil Liability:** The District hereby agrees to the imposition of an administrative civil liability totaling **seven hundred twenty-six thousand dollars (\$726,000)**. In accordance with CWC 13385(k), seven hundred twenty-three thousand dollars (\$723,000) has been satisfied and permanently suspended through the completion of the compliance project.
22. **Payment:** The District will make a payment of \$3,000 by check or money order referencing "Settlement Order No. R6T-2020-0055" and made payable to the State Water Pollution Cleanup and Abatement Account. Payment shall be made within 30 days of the Lahontan Water Board or the Executive Officer issuing the proposed Order as final. The check or money order shall be submitted to:

State Water Resources Control Board
Accounting Office, Attn: ACL Payment
P.O. Box 1888
Sacramento, CA 95812-1888

The District shall email a copy of the check to Lahontan@waterboards.ca.gov with the subject line: Susanville Sanitary District MMP Payment.

23. **Lahontan Water Board is Not Liable:** Neither the Lahontan Water Board members nor the Lahontan Water Board staff, attorneys, or representatives shall be liable for any injury or damage to persons or property resulting from acts or omissions by the District, its directors, officers, employees, agents, representatives or contractors in carrying out activities pursuant to this Settlement Agreement and Stipulation for Order, nor shall the Lahontan Water Board, its members or staff be held as parties to or guarantors of any contract entered into by District, its directors, officers, employees, agents, representatives or contractors in carrying out activities pursuant to this Settlement Agreement and Stipulation for Order. The District covenants not to sue or pursue any administrative or civil claim or claims against any State Agency or the State of California, or their officers, employees, representatives, agents, or attorneys arising out of or relating to any matter expressly addressed by this Settlement Agreement and Stipulation for Order.
24. **Compliance with Applicable Laws:** The District understands that payment of administrative civil liability in accordance with the terms of this Settlement Agreement and Stipulation for Order or compliance with its terms is not a substitute for compliance with applicable laws, and that continuing violations of the type alleged herein may subject the District to further enforcement, including additional administrative civil liability.

25. **Attorney's Fees and Costs:** Except as otherwise provided herein, each Party shall bear all attorneys' fees and costs arising from the Party's own counsel in connection with the matters set forth herein.
26. **Matters Addressed by Stipulation:** Upon adoption by the Lahontan Water Board or the Executive Officer issuing the proposed Order as final, this Settlement Agreement and Stipulation for Order represents a final and binding resolution and settlement of all claims, violations or causes of action alleged herein. The provisions of this Paragraph are expressly conditioned on the full payment of the administrative civil liability by the deadline specified in Section III, Paragraph 22.
27. **Public Notice:** The District understands that this Settlement Agreement and Stipulation for Order will be noticed for a 30-day public comment period prior to consideration by the Lahontan Water Board or the Executive Officer. If significant new information is received that reasonably affects the propriety of presenting this Settlement Agreement and Stipulation for Order to the Lahontan Water Board for adoption, the Prosecution Team Lead may unilaterally declare it void and decide not to present it to the Lahontan Water Board. The District agrees that it may not rescind or otherwise withdraw its approval of this proposed Settlement Agreement and Stipulation for Order.
28. **Addressing Objections Raised During Public Comment Period:** The Parties agree that the procedure contemplated for adopting this Settlement Agreement and Stipulation for Order by the Lahontan Water Board or the Executive Officer and its review by the public is lawful and adequate. In the event procedural objections are raised prior to the Order becoming effective, the Parties agree to meet and confer concerning any such objections and may agree to revise or adjust the procedure as necessary or advisable under the circumstances.
29. **Interpretation:** This Settlement Agreement and Stipulation for Order shall be construed as if the Parties prepared it jointly. Any uncertainty or ambiguity shall not be interpreted against any one Party. The District is represented by counsel in this matter.
30. **Modification:** This Settlement Agreement and Stipulation for Order shall not be modified by any of the Parties by oral representation made before or after its execution. All modifications must be in writing, signed by all Parties and approved by the Lahontan Water Board or the Executive Officer. All approvals and decisions of the Lahontan Water Board and the Executive Officer under the terms of this Settlement Agreement and Stipulation for Order shall be communicated to the District in writing. No oral advice, guidance, suggestions or comments by employees or officials of the Lahontan Water Board regarding submissions or notices shall be construed to relieve the District of its obligation to obtain any final written approval required by this Order.

31. **If the Order Does Not Take Effect:** In the event that this Settlement Agreement and Stipulation for Order does not take effect because it is not approved by the Lahontan Water Board or Executive Officer, or is vacated in whole or in part by the State Water Board or a court, the Parties acknowledge that they expect to proceed to a contested evidentiary hearing before the Lahontan Water Board to determine whether to assess administrative civil liabilities for the underlying alleged violations, unless the Parties agree otherwise. The Parties agree that all oral and written statements and agreements made during the course of settlement discussions will not be admissible as evidence in the hearing. The Parties agree to waive any and all objections based on settlement communications in this matter, including but not limited to:
- a. Objections related to prejudice or bias of any of the Lahontan Water Board members or their advisors and any other objections that are premised in whole or in part on the fact that the Lahontan Water Board members or their advisors were exposed to some of the material facts and the Parties' settlement positions as a consequence of reviewing the Settlement Agreement and Stipulation for Order, and therefore may have formed impressions or conclusions prior to any contested evidentiary hearing in this matter; or
 - b. Laches or delay or other equitable defenses based on the time period for administrative or judicial review to the extent this period has been extended by these settlement proceedings.
32. **Waiver of Hearing:** The District has been informed of the rights provided by California Water Code section 13323, subdivision (b), and hereby waives its right to a hearing before the Lahontan Water Board prior to the adoption of the Settlement Agreement and Stipulation for Order.
33. **Waiver of Right to Petition or Appeal:** The District hereby waives its right to petition the Lahontan Water Board's adoption of the Settlement Agreement and Stipulation for Order for review by the State Water Board, and further waives its rights, if any, to appeal the same to a California Superior Court and/or any California appellate level court. This explicit waiver of rights includes potential future decisions by the Lahontan Water Board, or its delegate related to this Settlement Agreement and Stipulation for Order, including but not limited to time extensions and other terms contained in this Settlement Agreement and Stipulation for Order.
34. **District's Covenant Not to Sue:** The District covenants not to sue or pursue any administrative or civil claim(s) against any state agency or the State of California, their officers, Board Members, employees, representatives, agents, or attorneys arising out of or relating to any matter covered herein.
35. **Authority to Bind:** Each person executing this Settlement Agreement and Stipulation for Order in a representative capacity represents and warrants that he or she is authorized to execute it on behalf of and to bind the entity on whose behalf

he or she executes it.

- 36. **Effective Date:** The obligations in this Settlement Agreement and Stipulation for Order are effective and binding only upon the entry of an Order by the Lahontan Water Board or Executive Officer which incorporates the terms of this Stipulation.
- 37. **Severability:** This Stipulation and Order are severable; should any provision be found invalid the remainder shall remain in full force and effect.
- 38. **Counterpart Signatures:** This Stipulation may be executed and delivered in any number of counterparts, each of which when executed and delivered shall be deemed to be an original, but such counterparts shall together constitute one document.

IT IS SO STIPULATED.

California Regional Water Quality Control Board Prosecution Team
Lahontan Region

By: -Original signed by-
Scott C. Ferguson
Supervising Water Resources Control Engineer
for Mike Plaziak, Assistant Executive Officer

Date: 8-28-2020

Susanville Sanitary District

By: - Original signed by -
Steve J. Stump
District Manager
Susanville Sanitary District

Date: 8-13-2020

Order of the Lahontan Water Board

This Order incorporates the foregoing Settlement Agreement and Stipulation for Order.

1. In accepting the foregoing Settlement Agreement and Stipulation for Order, the Lahontan Water Board has considered, where applicable, each of the factors prescribed in California Water Code section 13327. The Lahontan Water Board's consideration of these factors is based upon information obtained by the Lahontan Water Board staff in investigating allegations in the Complaint or otherwise provided to the Lahontan Water Board.
2. Issuance of this Settlement Agreement and Stipulation for Order is being taken for the protection of the environment and to enforce the laws and regulations administer by the Lahontan Water Board. As such, it is exempt from provisions of the California Environmental Quality Act (CEQA) (Public Resources Code, sections 21000 et seq.), in accordance with California Code of Regulations, title 14, sections 15307, 15308, and 15321.

Pursuant to California Water Code section 13323 and Government Code section 11415.60, **IT IS HEREBY ORDERED** on behalf of the California Lahontan Regional Water Quality Control Board.

Original signed by

Mike Plaziak
Acting Executive Officer

Date: 10/28/2020

Attachments:

- A. Mandatory Minimum Penalties for the period of September 3, 2008 to September 30, 2010
- B. Mandatory Minimum Penalties for the period of October 1, 2010 to June 30, 2020

Attachment A
Susanville Sanitary District Wastewater Treatment Plant
Table of Effluent Limit Violations

No.	Violation Date	Violation Type	Monitoring Location	Parameter Effluent Limit	Analytical Results	MMP
1	9/3/2008		EFF-002	Total Coliform 7-day Median \leq 23 MPN/100mL	50 MPN/100mL	0
2	9/4/2008		EFF-001	pH Instantaneous Maximum \leq 8.5	8.9	0
3	9/8/2008		EFF-001	pH Instantaneous Maximum \leq 8.5	8.7	0
4	9/10/2008	Chronic	EFF-001	pH Instantaneous Maximum \leq 8.5	8.6	1
5	9/11/2008	Chronic	EFF-001	pH Instantaneous Maximum \leq 8.5	8.6	1
6	9/11/2008	Chronic	EFF-002	Total Coliform 7-day Median \leq 23 MPN/100mL	50 MPN/100mL	1
7	9/13/2008	Chronic	EFF-001	Total Suspended Solids Weekly Average \leq 45 mg/L	50 mg/L	1
8	9/16/2008	Chronic	EFF-002	Total Coliform No more than one sample over 240 MPN/100 mL in a 30-day period	Sept. 11: 81,000 MPN/100 mL Sept. 16: 1,400 MPN/100 mL	1
9	9/16/2008	Chronic	EFF-002	Total Coliform 7-day Median \leq 23 MPN/100mL	50 MPN/100mL	1
10	9/23/2008	Chronic	EFF-002	Total Coliform 7-day Median \leq 23 MPN/100mL	140 MPN/100mL	1
11	9/30/2008	Chronic	EFF-001	Total Suspended Solids Monthly Average \leq 30 mg/L	37.8 mg/L	1
12	10/1/2008	Chronic	EFF-002	Total Coliform 7-day Median \leq 23 MPN/100mL	50 MPN/100mL	1
13	10/4/2008	Chronic	EFF-001	Total Suspended Solids Weekly Average \leq 45 mg/L	52 mg/L	1

No.	Violation Date	Violation Type	Monitoring Location	Parameter Effluent Limit	Analytical Results	MMP
14	10/8/2008	Chronic	EFF-002	Total Coliform 7-day Median \leq 23 MPN/100mL	80 MPN/100mL	1
15	10/11/2008	Chronic	EFF-001	Total Suspended Solids Weekly Average \leq 45 mg/L	48 mg/L	1
16	10/15/2008	Chronic	EFF-002	Total Coliform No more than one sample over 240 MPN/100 mL in a 30-day period	Sept. 16: 1,400 MPN/100 mL Oct. 15: 2,700 MPN/100 mL	1
17	10/15/2008	Chronic	EFF-002	Total Coliform 7-day Median \leq 23 MPN/100mL	140 MPN/100mL	1
18	10/22/2008	Chronic	EFF-002	Total Coliform No more than one sample over 240 MPN/100 mL in a 30-day period	Oct. 15: 2,700 MPN/100 mL Oct. 22: 360 MPN/100mL	1
19	10/22/2008	Chronic	EFF-002	Total Coliform 7-day Median \leq 23 MPN/100mL	360 MPN/100mL	1
20	10/29/2008	Chronic	EFF-002	Total Coliform No more than one sample over 240 MPN/100 mL in a 30-day period	Oct. 22: 360 MPN/100mL Oct. 29: 940 MPN/100 mL	1
21	10/29/2008	Chronic	EFF-002	Total Coliform 7-day Median \leq 23 MPN/100mL	360 MPN/100mL	1
22	10/31/2008	Chronic	EFF-001	Total Suspended Solids Monthly Average \leq 30 mg/L	35 mg/L	1
23	11/4/2008	Chronic	EFF-002	Total Coliform 7-day Median \leq 23 MPN/100mL	140 MPN/100mL	1
24	11/12/2008	Chronic	EFF-002	Total Coliform No more than one sample over 240 MPN/100 mL in a 30-day period	Oct. 29: 940 MPN/100 mL Nov. 12: 640 MPN/100 mL	1
25	11/12/2008	Chronic	EFF-002	Total Coliform 7-day Median \leq 23 MPN/100mL	360 MPN/100mL	1
26	11/19/2008	Chronic	EFF-002	Total Coliform 7-day Median \leq 23 MPN/100mL	360 MPN/100mL	1
27	11/22/2008	Chronic	EFF-001	Total Suspended Solids Weekly Average \leq 45 mg/L	47 mg/L	1
28	11/25/2008	Chronic	EFF-002	Total Coliform 7-day Median \leq 23 MPN/100mL	360 MPN/100mL	1

No.	Violation Date	Violation Type	Monitoring Location	Parameter Effluent Limit	Analytical Results	MMP
29	12/3/2008	Chronic	EFF-002	Total Coliform 7-day Median \leq 23 MPN/100mL	100 MPN/100mL	1
30	12/9/2008	Chronic	EFF-002	Total Coliform 7-day Median \leq 23 MPN/100mL	92 MPN/100mL	1
31	12/17/2008	Chronic	EFF-002	Total Coliform 7-day Median \leq 23 MPN/100mL	90 MPN/100mL	1
32	12/23/2008	Chronic	EFF-002	Total Coliform 7-day Median \leq 23 MPN/100mL	90 MPN/100mL	1
33	12/27/2008	Serious* and Chronic	EFF-001	Total Suspended Solids Weekly Average \leq 45 mg/L	73 mg/L	1
34	12/31/2008	Chronic	EFF-002	Total Coliform 7-day Median \leq 23 MPN/100mL	90 MPN/100mL	1
35	12/31/2008	Chronic	EFF-001	Total Suspended Solids Monthly Average \leq 30 mg/L	32 mg/L	1
36	1/7/2009	Chronic	EFF-002	Total Coliform 7-day Median \leq 23 MPN/100mL	78 MPN/100mL	1
37	1/13/2009	Chronic	EFF-002	Total Coliform No more than one sample over 240 MPN/100 mL in a 30-day period	Dec. 31: 500 MPN/100 mL Jan. 13: 940 MPN/100 mL	1
38	1/13/2009	Chronic	EFF-002	Total Coliform 7-day Median \leq 23 MPN/100mL	90 MPN/100mL	1
39	1/22/2009	Chronic	EFF-002	Total Coliform 7-day Median \leq 23 MPN/100mL	78 MPN/100mL	1
40	1/28/2009	Chronic	EFF-002	Total Coliform No more than one sample over 240 MPN/100 mL in a 30-day period	Jan. 13: 940 MPN/100 mL Jan. 28: 3,400 MPN/100 mL	1
41	1/28/2009	Chronic	EFF-002	Total Coliform 7-day Median \leq 23 MPN/100mL	78 MPN/100mL	1
42	2/4/2009	Chronic	EFF-002	Total Coliform No more than one sample over 240 MPN/100 mL in a 30-day period	Jan. 28: 3,400 MPN/100 mL Feb. 4: 600 MPN/100 mL	1
43	2/4/2009	Chronic	EFF-002	Total Coliform 7-day Median \leq 23 MPN/100mL	500 MPN/100mL	1

No.	Violation Date	Violation Type	Monitoring Location	Parameter Effluent Limit	Analytical Results	MMP
44	2/10/2009	Chronic	EFF-002	Total Coliform No more than one sample over 240 MPN/100 mL in a 30-day period	Feb. 4: 600 MPN/100 mL Feb. 10: 520 MPN/100 mL	1
45	2/10/2009	Chronic	EFF-002	Total Coliform 7-day Median \leq 23 MPN/100mL	520 MPN/100mL	1
46	2/14/2009	Chronic	EFF-001	Total Suspended Solids Weekly Average \leq 45 mg/L	59 mg/L	1
47	2/18/2009	Chronic	EFF-002	Total Coliform 7-day Median \leq 23 MPN/100mL	520 MPN/100mL	1
48	2/25/2009	Chronic	EFF-002	Total Coliform 7-day Median \leq 23 MPN/100mL	520 MPN/100mL	1
49	3/4/2009	Chronic	EFF-002	Total Coliform No more than one sample over 240 MPN/100 mL in a 30-day period	Feb. 10: 520 MPN/100 mL March 4: 540 MPN/100 mL	1
50	3/4/2009	Chronic	EFF-002	Total Coliform 7-day Median \leq 23 MPN/100mL	520 MPN/100mL	1
51	3/10/2009	Chronic	EFF-002	Total Coliform No more than one sample over 240 MPN/100 mL in a 30-day period	March 4: 540 MPN/100 mL March 10: 880 MPN/100 mL	1
52	3/10/2009	Chronic	EFF-002	Total Coliform 7-day Median \leq 23 MPN/100mL	540 MPN/100mL	1
53	3/18/2009	Chronic	EFF-002	Total Coliform 7-day Median \leq 23 MPN/100mL	520 MPN/100mL	1
54	3/21/2009	Serious* and Chronic	EFF-001	Total Suspended Solids Weekly Average \leq 45 mg/L	81 mg/L	1
55	3/25/2009	Chronic	EFF-002	Total Coliform 7-day Median \leq 23 MPN/100mL	84 MPN/100mL	1
56	3/28/2009	Serious* and Chronic	EFF-001	Total Suspended Solids Weekly Average \leq 45 mg/L	77 mg/L	1
57	3/31/2009	Serious* and Chronic	EFF-001	Total Suspended Solids Monthly Average \leq 30 mg/L	55 mg/L	1
58	4/1/2009	Chronic	EFF-002	Total Coliform 7-day Median \leq 23 MPN/100mL	60 MPN/100mL	1
59	4/2/2009	Chronic	EFF-001	pH Instantaneous Maximum \leq 8.5	8.8	1

No.	Violation Date	Violation Type	Monitoring Location	Parameter Effluent Limit	Analytical Results	MMP
60	4/7/2009	Chronic	EFF-001	pH Instantaneous Maximum \leq 8.5	8.7	1
61	4/8/2009	Chronic	EFF-002	Total Coliform 7-day Median \leq 23 MPN/100mL	70 MPN/100mL	1
62	4/13/2009	Chronic	EFF-001	pH Instantaneous Maximum \leq 8.5	8.6	1
63	4/14/2009	Chronic	EFF-001	pH Instantaneous Maximum \leq 8.5	8.7	1
64	4/15/2009	Chronic	EFF-001	pH Instantaneous Maximum \leq 8.5	9.0	1
65	4/15/2009	Chronic	EFF-002	Total Coliform 7-day Median \leq 23 MPN/100mL	70 MPN/100mL	1
66	4/16/2009	Chronic	EFF-001	pH Instantaneous Maximum \leq 8.5	8.9	1
67	4/22/2009	Chronic	EFF-002	Total Coliform 7-day Median \leq 23 MPN/100mL	70 MPN/100mL	1
68	4/28/2009	Chronic	EFF-002	Total Coliform 7-day Median \leq 23 MPN/100mL	60 MPN/100mL	1
69	5/6/2009	Chronic	EFF-002	Total Coliform 7-day Median \leq 23 MPN/100mL	60 MPN/100mL	1
70	5/13/2009	Chronic	EFF-001	pH Instantaneous Maximum \leq 8.5	8.6	1
71	5/14/2009	Chronic	EFF-001	pH Instantaneous Maximum \leq 8.5	8.7	1
72	5/14/2009	Chronic	EFF-002	Total Coliform 7-day Median \leq 23 MPN/100mL	70 MPN/100mL	1
73	5/20/2009	Chronic	EFF-002	Total Coliform 7-day Median \leq 23 MPN/100mL	70 MPN/100mL	1
74	5/28/2009	Chronic	EFF-002	Total Coliform 7-day Median \leq 23 MPN/100mL	160 MPN/100mL	1
75	5/31/2009	Chronic	EFF-001	Total Suspended Solids Monthly Average \leq 30 mg/L	30.5	1
76	6/4/2009	Chronic	EFF-002	Total Coliform 7-day Median \leq 23 MPN/100mL	160 MPN/100mL	1
77	6/10/2009	Chronic	EFF-002	Total Coliform 7-day Median \leq 23 MPN/100mL	34 MPN/100mL	1

No.	Violation Date	Violation Type	Monitoring Location	Parameter Effluent Limit	Analytical Results	MMP
78	6/18/2009	Chronic	EFF-002	Total Coliform 7-day Median \leq 23 MPN/100mL	34 MPN/100mL	1
79	6/25/2009	Chronic	EFF-002	Total Coliform 7-day Median \leq 23 MPN/100mL	34 MPN/100mL	1
80	7/1/2009	Chronic	EFF-002	Total Coliform 7-day Median \leq 23 MPN/100mL	32 MPN/100mL	1
81	7/7/2009	Chronic	EFF-001	pH Instantaneous Maximum \leq 8.5	8.7	1
82	7/8/2009	Chronic	EFF-001	pH Instantaneous Maximum \leq 8.5	8.8	1
83	7/8/2009	Chronic	EFF-002	Total Coliform 7-day Median \leq 23 MPN/100mL	32 MPN/100mL	1
84	7/9/2009	Chronic	EFF-001	pH Instantaneous Maximum \leq 8.5	9.1	1
85	7/10/2009	Chronic	EFF-001	pH Instantaneous Maximum \leq 8.5	9.1	1
86	7/13/2009	Chronic	EFF-001	pH Instantaneous Maximum \leq 8.5	8.8	1
87	7/14/2009	Chronic	EFF-001	pH Instantaneous Maximum \leq 8.5	8.9	1
88	7/15/2009	Chronic	EFF-001	pH Instantaneous Maximum \leq 8.5	8.7	1
89	7/16/2009	Chronic	EFF-001	pH Instantaneous Maximum \leq 8.5	8.8	1
90	7/17/2009	Chronic	EFF-001	pH Instantaneous Maximum \leq 8.5	8.7	1
91	7/18/2009	Chronic	EFF-001	Total Suspended Solids Weekly Average \leq 45 mg/L	57 mg/L	1
92	7/20/2009	Chronic	EFF-001	pH Instantaneous Maximum \leq 8.5	8.7	1
93	7/23/2009	Chronic	EFF-001	pH Instantaneous Maximum \leq 8.5	8.8	1
94	7/31/2009	Chronic	EFF-001	Total Suspended Solids Monthly Average \leq 30 mg/L	41.8 mg/L	1
95	8/5/2009	Chronic	EFF-002	Total Coliform 7-day Median \leq 23 MPN/100mL	50 MPN/100mL	1

No.	Violation Date	Violation Type	Monitoring Location	Parameter Effluent Limit	Analytical Results	MMP
96	8/12/2009	Chronic	EFF-002	Total Coliform No more than one sample over 240 MPN/100 mL in a 30-day period	July 29: 3,100 MPN/100 mL August 12: 500 MPN/100 mL	1
97	8/12/2009	Chronic	EFF-002	Total Coliform 7-day Median \leq 23 MPN/100mL	50 MPN/100mL	1
98	8/19/2009	Chronic	EFF-002	Total Coliform 7-day Median \leq 23 MPN/100mL	50 MPN/100mL	1
99	8/27/2009	Chronic	EFF-002	Total Coliform 7-day Median \leq 23 MPN/100mL	50 MPN/100mL	1
100	8/31/2009	Chronic	EFF-001	Total Suspended Solids Monthly Average \leq 30 mg/L	30.5 mg/L	1
101	9/2/2009	Chronic	EFF-002	Total Coliform 7-day Median \leq 23 MPN/100mL	50 MPN/100mL	1
102	9/5/2009	Serious* and Chronic	EFF-001	Total Suspended Solids Weekly Average \leq 45 mg/L	118 mg/L	1
103	9/5/2009	Chronic	EFF-001	Total Suspended Solids Weekly Average \leq 751 Lbs/day	755 Lbs/day	1
104	9/9/2009	Chronic	EFF-002	Total Coliform No more than one sample over 240 MPN/100 mL in a 30-day period	2 samples over the limit	1
105	9/9/2009	Chronic	EFF-002	Total Coliform 7-day Median \leq 23 MPN/100mL	50 MPN/100mL	1
106	9/16/2009	Chronic	EFF-002	Total Coliform No more than one sample over 240 MPN/100 mL in a 30-day period	Sept. 9: 3,000 MPN/100 mL Sept. 16: 280 MPN/100 mL	1
107	9/16/2009	Chronic	EFF-002	Total Coliform 7-day Median \leq 23 MPN/100mL	50 MPN/100mL	1
108	9/23/2009	Chronic	EFF-002	Total Coliform 7-day Median \leq 23 MPN/100mL	100 MPN/100mL	1
109	9/30/2009	Chronic	EFF-002	Total Coliform No more than one sample over 240 MPN/100 mL in a 30-day period	Sept. 16: 280 MPN/100 mL Sept. 30: 300 MPN/100 mL	1
110	9/30/2009	Chronic	EFF-002	Total Coliform 7-day Median \leq 23 MPN/100mL	100 MPN/100mL	1

No.	Violation Date	Violation Type	Monitoring Location	Parameter Effluent Limit	Analytical Results	MMP
111	9/30/2009	Serious* and Chronic	EFF-001	Total Suspended Solids Monthly Average \leq 30 mg/L	48 mg/L	1
112	10/7/2009	Chronic	EFF-002	Total Coliform 7-day Median \leq 23 MPN/100mL	100 MPN/100mL	1
113	10/14/2009	Chronic	EFF-002	Total Coliform 7-day Median \leq 23 MPN/100mL	100 MPN/100mL	1
114	10/21/2009	Chronic	EFF-002	Total Coliform 7-day Median \leq 23 MPN/100mL	100 MPN/100mL	1
115	10/24/2009	Chronic	EFF-001	Total Suspended Solids Weekly Average \leq 45 mg/L	56 mg/L	1
116	10/28/2009	Chronic	EFF-002	Total Coliform 7-day Median \leq 23 MPN/100mL	100 MPN/100mL	1
117	10/31/2009	Chronic	EFF-001	Total Suspended Solids Monthly Average \leq 30 mg/L	37.8 mg/L	1
118	11/4/2009	Chronic	EFF-002	Total Coliform 7-day Median \leq 23 MPN/100mL	42 MPN/100mL	1
119	11/12/2009	Chronic	EFF-002	Total Coliform 7-day Median \leq 23 MPN/100mL	34 MPN/100mL	1
120	11/14/2009	Chronic	EFF-001	Total Suspended Solids Weekly Average \leq 45 mg/L	56 mg/L	1
121	11/21/2009	Serious* and Chronic	EFF-001	Total Suspended Solids Weekly Average \leq 45 mg/L	67 mg/L	1
122	11/25/2009	Chronic	EFF-002	Total Coliform 7-day Median \leq 23 MPN/100mL	26 MPN/100mL	1
123	11/28/2009	Chronic	EFF-001	Total Suspended Solids Weekly Average \leq 45 mg/L	55 mg/L	1
124	11/30/2009	Serious* and Chronic	EFF-001	Total Suspended Solids Monthly Average \leq 30 mg/L	52.3 mg/L	1
125	12/19/2009	Serious* and Chronic	EFF-001	Total Suspended Solids Weekly Average \leq 45 mg/L	64 mg/L	1
126	12/23/2009	Chronic	EFF-002	Total Coliform 7-day Median \leq 23 MPN/100mL	26 MPN/100mL	1

No.	Violation Date	Violation Type	Monitoring Location	Parameter Effluent Limit	Analytical Results	MMP
127	12/26/2009	Chronic	EFF-001	Total Suspended Solids Weekly Average \leq 45 mg/L	62 mg/L	1
128	12/30/2009	Chronic	EFF-002	Total Coliform No more than one sample over 240 MPN/100 mL in a 30-day period	Dec. 16: 60,000 MPN/100 mL Dec. 30: 6,800 MPN/100 mL	1
129	12/31/2009	Serious* and Chronic	EFF-001	Total Suspended Solids Monthly Average \leq 30 mg/L	51.6 mg/L	1
130	1/2/2010	Chronic	EFF-001	Total Suspended Solids Weekly Average \leq 45 mg/L	60 mg/L	1
131	1/7/2010	Chronic	EFF-002	Total Coliform No more than one sample over 240 MPN/100 mL in a 30-day period	Dec. 30: 6,800 MPN/100 mL Jan. 7: 5,400 MPN/100 mL	1
132	1/7/2010	Chronic	EFF-002	Total Coliform 7-day Median \leq 23 MPN/100mL	60 MPN/100mL	1
133	1/13/2010	Chronic	EFF-002	Total Coliform 7-day Median \leq 23 MPN/100mL	60 MPN/100mL	1
134	1/20/2010	Chronic	EFF-002	Total Coliform 7-day Median \leq 23 MPN/100mL	60 MPN/100mL	1
135	1/27/2010	Chronic	EFF-002	Total Coliform 7-day Median \leq 23 MPN/100mL	200 MPN/100mL	1
136	2/3/2010	Chronic	EFF-002	Total Coliform 7-day Median \leq 23 MPN/100mL	60 MPN/100mL	1
137	2/10/2010	Chronic	EFF-002	Total Coliform 7-day Median \leq 23 MPN/100mL	200 MPN/100mL	1
138	2/17/2010	Chronic	EFF-002	Total Coliform 7-day Median \leq 23 MPN/100mL	44 MPN/100mL	1
139	2/24/2010	Chronic	EFF-002	Total Coliform 7-day Median \leq 23 MPN/100mL	30 MPN/100mL	1
140	2/27/2010	Chronic	EFF-001	Total Suspended Solids Weekly Average \leq 45 mg/L	46 mg/L	1
141	3/3/2010	Chronic	EFF-002	Total Coliform 7-day Median \leq 23 MPN/100mL	28 MPN/100mL	1
142	3/25/2010	Chronic	EFF-001	Total Suspended Solids Weekly Average \leq 45 mg/L	48.0 mg/L	1

No.	Violation Date	Violation Type	Monitoring Location	Parameter Effluent Limit	Analytical Results	MMP
143	3/31/2010	Chronic	EFF-001	Total Suspended Solids Monthly Average \leq 30 mg/L	39.3 mg/L	1
144	4/15/2010	Chronic	EFF-001	pH Instantaneous Maximum \leq 8.5	8.7	1
145	5/6/2010	Chronic	EFF-001	Total Suspended Solids Weekly Average \leq 45 mg/L	50.0 mg/L	1
146	5/10/2010	Chronic	EFF-001	pH Instantaneous Maximum \leq 8.5	8.6	1
147	5/20/2010	Chronic	EFF-001	Total Suspended Solids Weekly Average \leq 45 mg/L	47.0 mg/L	1
148	5/31/2010	Chronic	EFF-001	Total Suspended Solids Monthly Average \leq 30 mg/L	38.5 mg/L	1
149	6/30/2010	Chronic	EFF-001	Total Suspended Solids Monthly Average \leq 30 mg/L	32.3 mg/L	1
150	8/24/2010	Chronic	EFF-002	Total Coliform 7-day Median \leq 23 MPN/100mL	30 MPN/100mL	1
151	8/31/2010	Chronic	EFF-001	Total Suspended Solids Monthly Average \leq 30 mg/L	40.3 mg/L	1
152	8/31/2010	Chronic	EFF-001	Total Coliform 7-day Median \leq 23 MPN/100mL	30 MPN/100mL	1
153	9/7/2010	Chronic	EFF-002	Total Coliform 7-day Median \leq 23 MPN/100mL	30 MPN/100mL	1
154	9/30/2010	Chronic	EFF-001	Total Suspended Solids Monthly Average \leq 30 mg/L	31.2 mg/L	1

mg/L = milligrams per liter

MPN/100 mL = most probable number per 100 milliliters

First three of four violations occurring in a period of six months.

*One of the 10 serious violations that are not included in the chronic count.

Total violations subject to MMPs: 151

**ATTACHMENT B
RECORD OF VIOLATIONS FOR ASSESSING MANDATORY MINIMUM PENALTIES**

**SUSANVILLE SANITARY DISTRICT
WASTEWATER TREATMENT FACILITY**

RECORD OF VIOLATIONS (October 1, 2010 – June 30, 2020) MANDATORY PENALTIES
Data reported under Monitoring and Reporting Programs R6T-2008-0022 and R6T-2008-0022-A01

The following tables list the alleged violations subject to mandatory minimum penalties (MMPs),
pursuant to Water Code section 13385(h) and (i).

Table A. Effluent Violations Subject to Mandatory Penalties

Item	Date	Parameter	Units	Permit Limit	Measured	Period	Remarks	CIWQS Violation
-	8/31/2010	Total Coliform Organisms	MPN/100 ml	23	30	7-day median	5	882908
-	9/7/2010	Total Coliform Organisms	MPN/100 ml	23	30	7-day median	5	888483
-	9/30/2010	Total Suspended Solids	mg/L	30	31.2	monthly average	5	888482
1	10/12/2010	Total Coliform Organisms	MPN/100 ml	23	30	7-day median	4	1068632
2	11/9/2010	Total Coliform Organisms	MPN/100 ml	23	240	7-day median	4	1068633
3	11/23/2010	Total Coliform Organisms	MPN/100 ml	23	>1600	7-day median	4	1068634
4	11/30/2010	Total Coliform Organisms	MPN/100 ml	23	>1600	7-day median	4	1068635
5	11/30/2010	Total Coliform Organisms	MPN/100 ml	>240	>1600	More than once in a 30-day period	4	1068636
6	12/2/2010	Total Suspended Solids	mg/L	45	173	weekly average	1	890508
7	12/2/2010	Total Suspended Solids	lb/day	751	1265	weekly average	1	890510
8	12/7/2010	Total Coliform Organisms	MPN/100 ml	23	80	7-day median	4	1068637
9	12/14/2010	Total Coliform Organisms	MPN/100 ml	23	130	7-day median	4	1068638
10	12/29/2010	Total Suspended Solids	mg/L	45	60	weekly average	4	890509
11	12/31/2010	Total Suspended Solids	mg/L	30	65.2	monthly average	1	890420
12	12/31/2010	Total Suspended Solids	%	85	76	% removal, monthly average	4	890507
13	12/31/2010	Total Suspended Solids	lb/day	500	528	monthly average	4	890511
14	1/6/2011	Total Suspended Solids	mg/L	45	73	weekly average	1	894197
15	1/13/2011	Total Suspended Solids	mg/L	45	54	weekly average	4	894199
16	1/18/2011	Total Coliform Organisms	MPN/100 ml	23	130	7-day median	4	1068639
17	1/31/2011	Total Suspended Solids	mg/L	30	45	monthly average	1	894200
18	1/31/2011	Total Suspended Solids	%	85	69	% removal, monthly average	4	894202
19	2/10/2011	Residual Chlorine	mg/L	0.02	0.19	instantaneous maximum	2	1068640
20	2/14/2011	Residual Chlorine	mg/L	0.02	0.078	instantaneous maximum	2	1068641

**ATTACHMENT B
RECORD OF VIOLATIONS FOR ASSESSING MANDATORY MINIMUM PENALTIES**

21	2/28/2011	Residual Chlorine	mg/L	0.01	0.096	monthly average	2	1068644
22	2/28/2011	Total Suspended Solids	mg/L	30	31	monthly average	4	896510
23	2/28/2011	Total Suspended Solids	%	85	81	% removal, monthly average	4	896520
24	3/1/2011	Total Coliform Organisms	MPN/ 100 ml	23	50	7-day median	4	1068645
25	3/3/2011	Residual Chlorine	mg/L	0.02	0.03	instantaneous maximum	2	1068647
26	3/11/2011	Residual Chlorine	mg/L	0.02	0.05	instantaneous maximum	2	1068648
27	3/29/2011	Total Coliform Organisms	MPN/ 100 ml	23	1600	7-day median	4	1068646
28	3/31/2011	Residual Chlorine	mg/L	0.01	0.02	monthly average	2	1068649
29	4/8/2011	Residual Chlorine	mg/L	0.02	0.08	instantaneous maximum	2	1068650
30	4/15/2011	Residual Chlorine	mg/L	0.02	0.08	instantaneous maximum	2	1068651
31	4/30/2011	Residual Chlorine	mg/L	0.01	0.03	monthly average	2	1068652
32	4/30/2011	Total Suspended Solids	mg/L	30	33	monthly average	4	900729
33	4/30/2011	Total Suspended Solids	%	85	84	% removal, monthly average	4	900730
34	5/6/2011	Residual Chlorine	mg/L	0.02	0.06	instantaneous maximum	2	1068653
35	5/31/2011	Residual Chlorine	mg/L	0.01	0.02	monthly average	2	1068654
36	6/21/2011	Total Coliform Organisms	MPN/ 100 ml	23	30	7-day median	4	1068655
37	7/5/2011	Total Coliform Organisms	MPN/ 100 ml	23	30	7-day median	4	1068656
38	7/12/2011	Total Coliform Organisms	MPN/ 100 ml	23	30	7-day median	4	1068657
39	7/19/2011	Residual Chlorine	mg/L	0.02	0.04	instantaneous maximum	2	1068658
40	7/29/2011	Residual Chlorine	mg/L	0.02	0.05	instantaneous maximum	2	1068673
41	7/31/2011	Residual Chlorine	mg/L	0.01	0.03	monthly average	2	1068660
42	8/4/2011	pH	std unit	8.5	8.6	instantaneous maximum	4	911934
43	9/2/2011	Residual Chlorine	mg/L	0.02	0.12	instantaneous maximum	2	1068661
44	9/30/2011	Residual Chlorine	mg/L	0.01	0.02	monthly average	2	1068662
45	10/28/2011	Residual Chlorine	mg/L	0.02	0.03	instantaneous maximum	2	1068666
46	10/31/2011	Total Suspended Solids	%	85	80	% removal, monthly average	4	913068
47	10/31/2011	Total Suspended Solids	mg/L	30	33	monthly average	4	913066
48	12/2/2011	Residual Chlorine	mg/L	0.02	0.08	instantaneous maximum	2	1068667
49	12/9/2011	Residual Chlorine	mg/L	0.02	0.09	instantaneous maximum	2	1068668

**ATTACHMENT B
RECORD OF VIOLATIONS FOR ASSESSING MANDATORY MINIMUM PENALTIES**

50	12/16/2011	Residual Chlorine	mg/L	0.02	0.09	instantaneous maximum	2	1068669
51	12/22/2011	Residual Chlorine	mg/L	0.02	0.07	instantaneous maximum	2	1068670
52	12/22/2011	Total Suspended Solids	mg/L	45	46	weekly average	4	1068672
53	12/29/2011	Residual Chlorine	mg/L	0.02	0.05	instantaneous maximum	2	1068671
54	12/31/2011	Residual Chlorine	mg/L	0.01	0.08	monthly average	2	1068659
55	12/31/2011	Total Suspended Solids	mg/L	30	33	monthly average	4	925735
56	4/10/2012	Total Coliform Organisms	MPN/ 100 ml	23	110	7-day median	4	1068783
57	4/17/2012	Total Coliform Organisms	MPN/ 100 ml	23	80	7-day median	4	1068786
58	4/19/2012	pH	std unit	8.5	8.6	instantaneous maximum	4	1068790
59	4/25/2012	Total Coliform Organisms	MPN/ 100 ml	23	30	7-day median	4	1068788
60	5/8/2012	Total Coliform Organisms	MPN/ 100 ml	23	30	7-day median	4	1068791
61	5/22/2012	Total Coliform Organisms	MPN/ 100 ml	23	300	7-day median	4	1068792
62	5/29/2012	Total Coliform Organisms	MPN/ 100 ml	23	300	7-day median	4	1068794
63	5/29/2012	Total Coliform Organisms	MPN/ 100 ml	>240	300	More than once in a 30-day period	4	1068795
64	5/31/2012	Total Suspended Solids	mg/L	30	31	monthly average	4	1068796
65	6/5/2012	Total Coliform Organisms	MPN/ 100 ml	23	300	7-day median	4	1068812
66	6/12/2012	Total Coliform Organisms	MPN/ 100 ml	23	900	7-day median	4	1068813
67	6/12/2012	Total Coliform Organisms	MPN/ 100 ml	>240	900	More than once in a 30-day period	4	1068814
68	6/19/2012	Total Coliform Organisms	MPN/ 100 ml	23	300	7-day median	4	1068816
69	6/19/2012	Total Coliform Organisms	MPN/ 100 ml	>240	300	More than once in a 30-day period	4	1068815
70	6/26/2012	Total Coliform Organisms	MPN/ 100 ml	23	300	7-day median	4	1068817
71	6/26/2012	Total Coliform Organisms	MPN/ 100 ml	>240	300	More than once in a 30-day period	4	1068818
72	6/28/2012	Total Suspended Solids	mg/L	45	58	weekly average	4	1068819
73	6/30/2012	Total Suspended Solids	%	85	84	% removal, monthly average	4	1068820
74	6/30/2012	Total Suspended Solids	mg/L	30	42	monthly average	1	1068821
75	7/10/2012	Total Coliform Organisms	MPN/ 100 ml	23	130	7-day median	4	1068825
76	7/17/2012	Total Coliform Organisms	MPN/ 100 ml	23	130	7-day median	4	1068826
77	7/24/2012	Total Coliform Organisms	MPN/ 100 ml	23	110	7-day median	4	1068827
78	7/26/2012	pH	std unit	8.5	8.6	instantaneous maximum	4	937708

**ATTACHMENT B
RECORD OF VIOLATIONS FOR ASSESSING MANDATORY MINIMUM PENALTIES**

79	7/31/2012	Total Coliform Organisms	MPN/ 100 ml	23	170	7-day median	4	1068828
80	7/31/2012	Total Suspended Solids	mg/L	30	32	monthly average	4	930412
81	8/7/2012	Total Coliform Organisms	MPN/ 100 ml	23	500	7-day median	4	1068829
82	8/14/2012	Total Coliform Organisms	MPN/ 100 ml	23	110	7-day median	4	1068830
83	8/21/2012	Total Coliform Organisms	MPN/ 100 ml	23	60	7-day median	4	1068831
84	8/28/2012	Total Coliform Organisms	MPN/ 100 ml	23	240	7-day median	4	1068832
85	9/4/2012	Total Coliform Organisms	MPN/ 100 ml	23	130	7-day median	4	1068833
86	9/11/2012	Total Coliform Organisms	MPN/ 100 ml	23	110	7-day median	4	1068834
87	9/13/2012	pH	std unit	8.5	8.9	instantaneous maximum	4	938497
88	9/18/2012	Total Coliform Organisms	MPN/ 100 ml	23	130	7-day median	4	1068835
89	9/25/2012	Total Coliform Organisms	MPN/ 100 ml	23	900	7-day median	4	1068836
90	9/27/2012	pH	std unit	8.5	8.8	instantaneous maximum	4	938498
<i>Amended Permit (R6T-2008-0022-A01) in effect</i>								
91	1/17/2019	pH	std unit	6.5	6.4	instantaneous minimum	3	1055735

Table B. Reporting Violations Subject to Mandatory Penalties

	<u>Report</u>	<u>Due Date</u>	<u>Date Submitted</u>	<u># of 30-day periods after due date</u>	<u># of serious violations</u>	<u>CIWQS</u>
1	June 2015 monthly	7/15/2015	9/9/2015	1	1	1068842

Remarks:

1. Serious violation: For Group 1 pollutants (i.e., TSS) that exceed the effluent limitation by 40% or more.
2. Serious Violation: For Group 2 pollutants (i.e., chlorine) that exceed the effluent limitation by 20% or more.
3. Non-serious violation not subject to MMPs: the violation falls within the first three violations within a 180-day period, and thus is not subject to MMPs.
4. Non-serious violation subject to MMPs.
5. Supporting violation for which MMPs have already been assessed in ACLC-R6T-2011-0002. Used to determine the 180-day period for non-serious violations.

VIOLATIONS AS OF: As of June 30, 2020

Group I Serious Violations:	6
Group II Serious Violations:	23
Serious Reporting Violations	1
Non-serious Violations Subject to MMPs:	61
Total Violations Subject to MMPs:	91

Non-Serious Violations Not Subject to MMPs: 1

91 MMP Violations x \$3,000 per violation = \$273,000