

Exhibit "A"

City of Eureka
Elk River Wastewater Treatment Facility
WDRs Order No. R1-2009-0033
NPDES Permit No. CA0024449
WDID No. 1B82151OHUM

NOTICE OF VIOLATION
(Tentative Administrative Civil Liability Order No. R1-2014-0038)
MANDATORY MINIMUM PENALTIES WITHOUT ENFORCEMENT

for the

Period October 1, 2011 through February 28, 2014

The following table lists this facility's alleged violations of subdivisions (h) and (i) of California Water Code section 13385, which have not received mandatory minimum penalty assessment by the Water Boards. Final calculation of MMP amounts owed, and descriptions of the abbreviations that appear in the table are also listed below. For additional information about the alleged violations listed in the table, please refer to the SWRCB Public Reports webpage http://www.waterboards.ca.gov/water_issues/programs/ciwqs/publicreports.shtml choose the "MMP Report" link located under the "Enforcement Reports" category. Once in the Public Reports search page, enter the search criteria that correspond to your facility to access the list of violations.

CIWQS ID	Violation Date	Violation Type	Parameter	Reported Value	Limit	Units	MMP Type	MMP Amount
924692	3/31/12	CAT1	Coliform Min. 30-day	20	10	%	1 st Chronic	\$0*
941403	11/15/12	CAT2	Copper 6-Month Median	35	33	ug/L	1 st Chronic	\$0*
941402	11/20/12	CAT1	Settleable Solids Daily Max	1.5	0.2	ml/L/hr	Serious	\$3,000
958856	10/31/13	CAT2	Copper 6-Month Median	34	33	ug/L	1 st Chronic	\$0
959820	11/30/13	CAT2	Copper 6-Month Median	34	33	ug/L	2 nd Chronic	\$0
961691	12/31/13	CAT2	Copper 6-Month Median	37	33	ug/L	3 rd Chronic	\$0
963463	1/31/14	CAT2	Copper 6-Month Median	40	33	ug/L	Chronic	\$3,000
965392	2/11/14	CAT2	Copper 6-Month Median	40	33	ug/L	Chronic	\$3,000
TOTAL								\$9,000

EXPEDITED PAYMENT AMOUNT: \$9,000

Mandatory Minimum Penalty Amount Owed for Effluent Violations

((1 Serious + 2 Chronic Violations) × \$3,000) = \$9,000 owed to the Cleanup & Abatement Account

Definition of Acronyms & Abbreviations

CIWQS	California Integrated Water Quality System database used by the Water Boards to manage violation and enforcement activities.
Violation ID	Identification number assigned to a violation in CIWQS.
Occurrence Date	Date that a violation actually occurred. For continuing violations, such as a monthly average, the last day of the reporting period is used. If the occurrence date is unknown, the date is entered as the day it was first discovered by staff, the Discharger, or a third party. For deficient or late reports, the occurrence date is the day after the report was due.
Type	Classification of a violation. Two types of violations relate to MMPs: 1) Late Reporting Violations (LREP, DREP) 2) Effluent Violations (ATOX, CTOX, CAT1, CAT2, OEV)
LREP	Late reporting violation. Every 30 days a report is late counts as one late reporting violation.
DREP	Deficient reporting violation. This will only result in an MMP if the report is so deficient as to make determination of compliance impossible for that reporting period.
ATOX	Violation of an acute toxicity effluent limitation.
CTOX	Violation of a chronic toxicity effluent limitation.
CAT1	Violation of an effluent limitation for a Group I pollutant by more than 40%.
CAT2	Violation of an effluent limitation for a Group II pollutant by more than 20%.
OEV	Violation of any constituent-specific effluent limitation not included in Group I or Group II.
MMP Type	Classification of the type of MMP violation.
CHRON	Chronic violation as defined by California Water Code section 13385 (i). To be counted as a chronic violation, there must be 3 preceding violations within a 180 day period. The fourth non-serious violation that occurs within the 180 period is an MMP violation.
SIG	Serious violation as defined by California Water Code section 13385 (h). Waste discharge exceeds the effluent limitation for a Group I pollutant by 40% or more (CAT1), or a Group II pollutant by 20% or more (CAT2). Also defined by California Water Code section 13385.1 as a failure to file a discharge monitoring report pursuant to Section 13383 for each 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.
Violation Description	Narrative description of the violation.
M	Effluent exceeds limit for monthly reporting period.
Q	Effluent exceeds limit for quarterly reporting period.
S	Effluent exceeds limit for semi-annual reporting period.
A	Effluent exceeds limit for annual reporting period.
IM	Effluent exceeds instantaneous maximum limitation.
DM	Effluent exceeds daily maximum limitation.
AW	Effluent exceeds average weekly limitation.
AM	Effluent exceeds average monthly limitation.