

MANDATORY PENALTY ADMINISTRATIVE CIVIL LIABILITY

Eureka City

Eureka City Elk River WWTP

WDID No. 1B82151OHUM NPDES No. CA0024449

EXHIBIT "A"

Effluent Limitation Violations Requiring Mandatory Minimum Penalties

#	Violation Number	Violation Date	Constituent	Pollutant Group	Limitation Period	Limit	Result/Average	Units	Exempted from MMP?	Exempt Reason	% Over Limit	Date 180 Days Prior	Serious or Chronic Violation?	No. of Violations within 180 days	Mandatory Fine?	Water Code	Penalty
1	967399	03/11/2014	Copper, Total	Group 2	6-Month Median	33	37	ug/L	N		12%	09/12/2013	C	6	Y	13385(i)	\$ 3,000
2	969216	04/08/2014	Copper, Total	Group 2	6-Month Median	33	37	ug/L	N		12%	10/10/2013	C	7	Y	13385(i)	\$ 3,000
3	970168	05/13/2014	Copper, Total	Group 2	6-Month Median	33	34.5	ug/L	N		5%	11/14/2013	C	7	Y	13385(i)	\$ 3,000
4	978887	09/09/2014	Copper, Total	Group 2	6-Month Median	33	36	ug/L	N		9%	03/13/2014	N/A	3	N		\$ 0
5	978888	09/30/2014	Fecal Coliform	Other	Other	10	17	%	N		N/A	04/03/2014	C	4	Y	13385(i)	\$ 3,000
6	980918	10/31/2014	Copper, Total	Group 2	6-Month Median	33	36	ug/L	N		9%	05/04/2014	C	4	Y	13385(i)	\$ 3,000
7	983598	11/11/2014	Copper, Total	Group 2	6-Month Median	33	36	ug/L	N		9%	05/15/2014	C	4	Y	13385(i)	\$ 3,000
8	985263	12/08/2014	Copper, Total	Group 2	6-Month Median	33	36	ug/L	N		9%	06/11/2014	C	5	Y	13385(i)	\$ 3,000
9	985261	12/21/2014	Chlorine, Total Residual	Group 2	Single Sample	0.1	0.17	mg/L	N		70%	06/24/2014	C	6	Y	13385(i)	\$ 3,000
10	985262	12/30/2014	Fecal Coliform	Other	Other	10	12	%	N		N/A	07/03/2014	C	7	Y	13385(i)	\$ 3,000

Total Penalty: \$ 27,000

1 - Violation occurs on sample date or last date of averaging period.

2 - For Group I pollutants, a violation is serious when the limit is exceeded by more than 40%

- For Group II pollutants, a violation is serious when the limit is exceeded by more than 20%

3 - When a serious violation occurs on the same day as a chronic, the serious violation is only assessed an MMP once and is counted last for the day when determining the number of chronic violations to be assessed a

Violation period ending the last day of December 2014

Group I Violations Assessed MMP: 0

Group II Violations Assessed MMP: 7

Other Effluent Violations Assessed MMP: 2

Violations Exempt from MMP: 0

Total Violations Assessed MMP: 9

Mandatory Minimum Penalty = (0 Serious Violations + 9 Non-Serious Violations) x \$3,000 = \$27,000