

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN FRANCISCO BAY REGION

COMPLAINT NO. R2-2008-0099

ADMINISTRATIVE CIVIL LIABILITY
IN THE MATTER OF
WASTE DISCHARGE VIOLATIONS
SAN FRANCISCO PUBLIC UTILITIES COMMISSION
SECTION OF CRYSTAL SPRINGS PIPELINE NO.2 LOCATED AT
3200 GENEVA AVENUE, DALY CITY, SAN MATEO COUNTY, CA 94014

This Complaint is issued to the San Francisco Public Utilities Commission (hereinafter “Discharger”) to assess administrative civil liability pursuant to California Water Code (CWC) § 13385. The Complaint addresses two types of violations: a 468,000-gallon contaminated water spill and noncompliance with the Fuels General NPDES Permit. These violations occurred during two periods of December 20 through December 26, 2006, and December 29, through January 11, 2007, respectively.

The Assistant Executive Officer of the California Regional Water Quality Control Board, San Francisco Bay Region (Regional Water Board), hereby gives notice that:

1. The Discharger is alleged to have violated provisions of law for which the Regional Water Board may impose civil liability pursuant to CWC § 13385. This Complaint proposes to assess \$115,000 in penalties for these violations based on the considerations described in this Complaint. The deadline for comments on this Complaint is **April 15, 2009**.
2. The Discharger owns a chlorinated water pipeline, a 60-inch diameter drinking water main, named Crystal Springs Pipeline No.2 (hereinafter the Pipeline). A section of the Pipeline runs under the Pacific Gas and Electric (PG&E) Martin Service Center Yard (hereinafter the PG&E Yard) located at 3200 Geneva Avenue, Daly City, San Mateo County. The soil beneath the PG&E Yard is contaminated with pollutants such as petroleum hydrocarbons from gas manufacturing activities in the 1900s. The Department of Toxic Substances Control is the lead agency overseeing the cleanup of the polluted soil and groundwater at the PG&E Yard.
3. The Complaint addresses two types of violations occurring during two periods: First type of violation is an unauthorized 468,000-gallon discharge of contaminated (with petroleum and chlorine) water from December 20, 2006, through December 26, 2006, (hereinafter Unauthorized Discharge Violation). The second type of violation is noncompliance with a discharge prohibition and five effluent limitations established in NPDES Permit No. CAG912002, Order Number R2-2006-0075, from December 29, 2006, through January 11, 2007 (hereinafter Permit Violations).
4. Unless waived, the Regional Water Board will hold a hearing on this Complaint at its June 10, 2009, meeting at the Elihu M. Harris State Building, First Floor Auditorium, 1515 Clay

Street, Oakland. The Discharger or its representatives will have an opportunity to be heard and to contest the allegations in this Complaint and the imposition of the civil liability. An agenda for the meeting will be mailed to the Discharger not less than 10 days before the hearing date. The deadline to submit all written comments and evidence concerning this Complaint is specified in Finding 1. At the hearing, the Regional Water Board will consider whether to affirm, reject, or modify the proposed civil liability; to refer the matter to the Attorney General for recovery of judicial liability; or take other enforcement actions.

5. The Discharger can waive its right to a hearing to contest the allegations contained in this Complaint by (a) paying the civil liability in full, or (b) undertaking an approved supplemental environmental project in an amount not to exceed \$50,000 and paying the remainder of the civil liability, all in accordance with the procedures and limitations set forth in the attached waiver.

ALLEGATIONS

6. Unauthorized Discharge Violation:

- a. On December 20, 2006, the Discharger was notified by PG&E of a possible leak from the Discharger's Pipeline at the PG&E Yard.
- b. The Discharger investigated and confirmed the Pipeline leak beneath a concrete paved area of the PG&E Yard with a flow rate of approximately 50 gallon per minute.
- c. The Discharger was unable to stop the leak immediately because a positive pressure had to be maintained in the Pipeline to protect the quality of the drinking water inside.
- d. The chlorinated water that leaked from the Pipeline came in contact with, and was contaminated by, the contaminated soil and groundwater around the Pipeline.
- e. The contaminated water from the Pipeline surfaced and travelled 300 feet over a concrete paved area in the PG&E Yard before discharging to a storm drain.
- f. The Discharger put in place dechlorination tablets for the unauthorized discharge just before it entered the storm drain. However, this treatment did not effectively remove all the chlorine from the water for the first 36 hours.
- g. The unauthorized discharge travelled 250 feet, inside the storm drain system, before entering the southern channel of the Main Street Detention Basin.
- h. In approximately 1.5 miles, water in the detention basin reached Central San Francisco Bay through the Eastern Bay Shore outfall.
- i. This unauthorized 468,000 gallons discharge continued through December 26, 2006, containing chlorine residue and petroleum related pollutions.

7. Permit Violations:

- a. On December 27, 2006, the Discharger diverted the polluted water to a series of storage tanks.
- b. The Discharger obtained discharge authorization on December 27, 2007, from the Regional Water Board under Order No. R2-2006-0075 (NPDES permit No. CAG912002) to treat and discharge the stored polluted water.

- c. During December 28, 2006, through January 11, 2007, (15 days) the Discharger treated the stored polluted water and discharged it to the Main Street Detention Basin's southern channel.
- d. However, the treatment system was inadequately designed and/or maintained resulting in discharge of partially treated effluent in violation of Order No. R2-2006-0075 requirements.

REQUIREMENTS APPLICABLE TO THE DISCHARGES

8. Section 301 of the Clean Water Act considers discharge of any pollutant by any person as unlawful unless that person complies with all the permitting requirements under the Clean Water Act.
9. CWC Chapter 5.5 § 13376 requires any person discharging pollutants or proposing to discharge pollutants to file a report of waste discharge.
10. The Regional Water Board adopted Order No. R2-2006-0075 on November 13, 2006 (NPDES Permit No. CAG912002). This order sets waste discharge requirements for discharge or reuse of extracted and treated groundwater resulting from the cleanup of groundwater polluted by fuel leaks and other related wastes at service stations and similar sites. On December 27, 2006, the Discharger received discharge authorization under this permit.
11. Order No. R2-2006-0075 requires compliance with the Discharge Prohibition III.E: *Neither the treatment nor the discharge of pollutants shall create a pollution, contamination, or nuisance, as defined by Section 13050 of the California Water Code.*
12. Order No. R2-2006-0075 requires that discharge of the effluent shall maintain compliance with the following effluent limitations at a discharge point after full treatment but before it joins or is diluted by any other waste stream, body of water, or substance:
 - a. Effluent Limitation IV.A.1.1: Benzene maximum daily limit of 5 microgram per liter (ug/L),
 - b. Effluent Limitation IV.A.1.10: Toluene maximum daily limit of 5 ug/L,
 - c. Effluent Limitation IV.A.1.17: Total Xylenes maximum daily limit of 5 ug/L,
 - d. Effluent Limitation IV.A.1.19: Total Petroleum Hydrocarbons maximum daily limit of 50 ug/L,
 - e. Effluent Limitation IV.A.2: The pH of the discharge shall not be less than 6.5.

WATER CODE PROVISIONS RELEVANT TO THESE DISCHARGES

13. Pursuant to CWC Chapter 5.5 § 13385(a)(1), a discharger is subject to administrative civil liability for violating Water Code section 13376 which requires that any person who discharges pollutants to the navigable waters of the United States within the jurisdiction of the State shall file a report of the discharge in compliance with the procedures set forth in Water Code section 13260. Section 13260 in turn requires that any person discharging waste, or proposing to discharge waste, that could affect the quality of the waters of the

state must file a report of waste discharge. Section 13264 provides that no person shall initiate any new discharge of waste prior to filing the report required under section 13260.

14. Pursuant to CWC section 13385(a)(5), an unauthorized discharge is subject to civil liability for Clean Water Act section 301.
15. Pursuant to CWC Chapter 5.5 § 13385(a)(2), a discharger is subject to civil liability for violating any waste discharge requirement.
16. Pursuant to § 13385(c), a regional board may impose civil liability administratively pursuant to Chapter 5, Article 2.5 (commencing at § 13323) in an amount not to exceed the sum of both of the following:
 - a. *Ten thousand dollars (\$10,000) for each day in which the violation occurs.*
 - b. *Where there is a discharge, any portion of which not susceptible to cleanup or not cleaned up, and the volume discharged but not cleaned up exceeds 1,000 gallons, an additional liability not to exceed ten dollars (\$10) multiplied by the number of gallons by which the volume discharged but not cleaned up exceeds 1,000 gallons.*
17. Pursuant to § 13385(h)(1), a mandatory minimum penalty of three thousand dollars (\$3,000) must be assessed for each serious violation. Pursuant to § 13385(i)(1), a mandatory minimum penalty of three thousand dollars (\$3,000) must be assessed for each violation whenever the Discharger does any of the following in 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 § 13260.
 - c. Files an incomplete report pursuant to § 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.
18. If the matter is referred to the Attorney General for judicial enforcement, then under § 13385(b) a higher liability of \$25,000 per day of violation and \$25 per gallon of discharge may be imposed.

VIOLATIONS

19. **Unauthorized Discharge Violation:** The December 20 through December 26, 2006, discharge to surface water of 468,000 gallons of polluted water without a permit violated CWC Chapter 5.5 § 13385(a)(1) and (a)(5).
20. **Permit Violations:** As shown in Tables 1 and 2, the December 29, 2006, through January 11, 2007, violations of one discharge prohibition and seventeen effluent limit of Order No. R2-2006-0075 were also in violation of CWC Chapter 5.5 § 13385(a)(2).

MINIMUM LIABILITY

21. Pursuant to CWC § 13385, there are minimum liability for both unauthorized discharge and permit violations.
- a. **Unauthorized Discharge Violation:** According to CWC § 13385(e), at a minimum, liability shall be assessed at a level that recovers the economic benefit or savings, if any, derived from the unauthorized discharge violation.
 - b. **Permit Violations:** These violations require both mandatory minimum penalties pursuant to section 13385(h) or (i) and administrative civil liability pursuant to section 13385(a) through (e). As such, economic benefit, or the mandatory penalty amount, whichever is greater, at a minimum must be recovered.

MAXIMUM LIABILITY

22. Pursuant to CWC § 13385(c), the maximum administrative civil liability the Regional Water Board may impose for the violations is \$16,812,000. Each type of violation is detailed below and based on a liability of \$10,000 per day of violation and \$10 per gallon of waste discharged above 1,000 gallons.
- a. **Unauthorized Discharge Violation:** The maximum administrative civil liability for the unauthorized discharge of approximately 468,000 gallons over a seven-day period is \$4,740,000.
 - b. **Permit Violations:** The maximum administrative civil liability for violating the NPDES permit by discharging approximately 1,195,200 gallons of partially treated polluted water over a 13-day period is \$12,072,000

CONSIDERATION OF FACTORS UNDER § 13385

23. In determining the amount of civil liability to assess against the Discharger, the Regional Water Board has taken into consideration the factors described in CWC § 13385(e). These factors are listed below and discussed in the following paragraphs:
- The nature, circumstances, extent, and gravity of the violations;
 - Whether the discharge is susceptible to cleanup or abatement;
 - The degree of toxicity of the discharge;
 - With respect to the discharger, the ability to pay and the effect on ability to continue in business;
 - Any voluntary cleanup efforts undertaken;
 - Any prior history of violations;
 - The degree of culpability;
 - The economic benefit or savings, if any, resulting from the violations; and
 - Other such matters as justice may require.

24. **The nature, circumstances, extent, and gravity of the violations**

- a. **Unauthorized Discharge Violation:** From December 20 through December 26, 2006, the Discharger reported an unauthorized discharge of petroleum-contaminated water. The unauthorized discharge, caused by a corroded pipeline, entered the Central San Francisco Bay via the Main Street Detention Basin. The

discharge volume was approximately 468,000 gallons. The petroleum-contaminated water contained chlorine as high as 2.1 mg/L, total petroleum hydrocarbon as high as 2,500 ug/L, benzene as high as 7.155 ug/L, and other pollutants. These contamination concentration levels exceed water quality protection standards. Pollutant levels above these standards are lethal to fish and aquatic life.

- b. **Permit Violations:** From December 28, 2006, through January 11, 2007, the Discharger reported 17 effluent limitation violations. The Discharger violated the effluent limitation as a result of using an inadequate treatment system. The most frequent violations were total petroleum hydrocarbon limit (10 violations) and benzene limit (2 violations). The violations ranged from 4 to 140 percent above the effluent limits. More detail is provided in Table 1. The Discharger also reported total chlorine in the effluent during this period with concentrations ranging from 0.1 to 2.4 mg/L (Table 2). The chlorine levels violate the permit's discharge prohibition, which prohibits the discharge of pollutants (e.g., chlorine). Chlorine in the effluent polluted the water in the Main Street Detention Basin southern channel. The Discharger violated the discharge prohibition as a result of not properly dechlorinating the polluted water prior to discharge.

25. Whether the discharge is susceptible to cleanup or abatement

- a. **Unauthorized Discharge Violation:** The Discharger was unable to stop the leak immediately because a positive pressure had to be maintained in the Pipeline to protect the quality of the drinking water inside. Thus, the discharge was not susceptible to cleanup or abatement during the first seven days. On the eighth day, the Discharger successfully abated the unauthorized discharge through diversion to storage tanks.
- b. **Permit Violations:** Once the effluent entered the storm drain and reached the Main Street Detention Basin, it was not susceptible to cleanup or abatement because detention basin could not detain the high flow rate of the effluent and the high volume of effluent alone or mixed with rain water in the basin once mixed could not be cleaned up or abated.

26. The degree of toxicity of the discharge

- a. **Unauthorized Discharge Violation:** During the first 36 hours of the unauthorized discharge, the degree of toxicity was high. The Discharger reported chlorine concentrations above the US EPA criterion (0.019 mg/L) and as high as 2.19 mg/L. Levels above the USEPA criterion are lethal to fish. For other pollutants such as petroleum hydrocarbons the degree of toxicity in the discharge was low.
- b. **Permit Violations:** During the authorized discharge, the degree of toxicity remained high because the Discharger reported chlorine concentration for most days above the US EPA criterion (0.019 mg/L) and as high as 2.4 mg/L. Levels above this criterion are lethal to fish. For all other pollutants (petroleum-related and pH) the degree of toxicity was low.

27. The ability to pay and the effect on ability to continue in business

The proposed Administrative Civil Liability (ACL) of \$115,000 is a small fraction (less than 1%) of the Discharger's \$12 million approximate annual operations and maintenance budget for the transmission system.

28. Any voluntary cleanup efforts undertaken

- a. **Unauthorized Discharge Violation:** The Discharger was unable to stop the leak immediately because a positive pressure had to be maintained in the Pipeline to protect the quality of the drinking water inside. However, the Discharger immediately initiated the dechlorination of the leak, which was partially successful. The Discharger also made arrangements to have temporary storage tanks to be delivered to the PG&E Yard. After 7 days of discharge, the Discharger was able to divert the unauthorized discharge to a series of storage tanks. Once in the storage tanks the petroleum contaminated water was treated to remove petroleum-related contamination and chlorine, and then discharged to the Main Street Detention Basin under an NPDES permit.
- b. **Permit Violations:** Cleanup or remediation of the discharge was impossible after discharge to the Main Street Detention Basin because the discharge volume exceeded the Basin's capacity.

29. Any prior history of violations

- a. **Unauthorized Discharge Violation:** From 1984 through 1995, the Discharger reported three leaks at the PG&E Yard from the same pipeline that is the subject of this complaint. The Discharger found corrosion to be the cause of those previous leaks. After each leak, the Discharger conducted corrective actions to retard the corrosion process. The Discharger reported no violations for more than ten years from 1995 to 2006
- b. **Permit Violations:** No prior history of permit violations at this site exist because the Discharger obtained coverage under the permit for the first time on December 27, 2006 which was after the spill began.

30. The degree of culpability

- a. **Unauthorized Discharge Violation:** The Discharger's degree of culpability is low because, (1) the Discharger implemented corrective actions when historical leaks occurred in 1988, 1992, and 1995, (2) the Discharger reported no leaks from 1995-2006 (about 10 years). Furthermore, the Discharger is investigating whether stray electrical current at the PG&E Yard is accelerating Pipeline corrosion. In parallel and as a part of a water supply improvement program (e.g. to make the Pipeline withstand future earthquakes), the Discharger has plans to replace the Pipeline at a cost of about \$1.6 million.
- b. **Permit Violations:** The Discharger's degree of culpability is medium for under-designing the treatment system. Furthermore, the Discharger made no arrangements with the contract laboratory to provide the results of effluent monitoring data on an expedited turn-around schedule, which caused most violations un-noticed for more than one week.

31. The economic benefit of savings

- a. **Unauthorized Discharge Violation:** There were no economic savings or benefit from this violation, because the Discharger did not appear to have deferred maintenance or replacement of the corroded Pipeline section. Furthermore, the Discharger will be replacing the Pipeline primarily for other reasons and will incur full costs for that effort in the near future (estimated \$1.6 million).
- b. **Permit Violations:** The Discharger gained economic savings for failing to have an adequate treatment system capable of ensuring compliance with the General Permit's effluent limitations. Such a system would require additional storage tanks and filters. These additional treatment units would have cost \$30,000. However, this economic savings does not exceed the \$45,000 required mandatory minimum penalty.

32. Other such matters as justice may require

For the unauthorized discharge, the Discharger took timely and immediate action to dechlorinate the chlorinated water discharge, though due to turbidity, dechlorination was at times unsuccessful.

STAFF TIME

- 33.** Regional Water Board Staff time to prepare the Complaint and supporting evidence is estimated to be about 112 hours. Based on an average cost to the State of \$135 per hour, the total staff cost is rounded to \$15,000.

PROPOSED CIVIL LIABILITY

- 34.** The Assistant Executive Officer therefore proposes a civil liability of \$115,000, which exceeds the required mandatory minimum penalty (\$45,000) and the potential economic saving; and includes staff costs.

CEQA EXEMPTION

- 35.** The issuance of this Complaint is an enforcement action and is, therefore, exempt from the California Environmental Quality Act, pursuant to Title 14, California Code of Regulations, § 15321.

March 10, 2009

Date

Thomas E. Mumley
Assistant Executive Officer

Attachments: Waiver of Hearing
Exhibit "A"

**WAIVER FOR
ADMINISTRATIVE CIVIL LIABILITY COMPLAINT**

If you waive your right to a hearing, the matter will be included on the agenda of a Water Board meeting but there will be no hearing on the matter, unless a) the Water Board staff receives significant public comment during the comment period, or b) the Water Board determines it will hold a hearing because it finds that new and significant information has been presented at the meeting that could not have been submitted during the public comment period. If you waive your right to a hearing but the Water Board holds a hearing under either of the above circumstances, you will have a right to testify at the hearing notwithstanding your waiver. Your **waiver is due no later than April 15, 2009.**

- Waiver of the right to a hearing and agreement to make payment in full.
By checking the box, I agree to waive my right to a hearing before the Water Board with regard to the violations alleged in Complaint No. **R2-2008-0099** and to remit the full penalty payment to the State Water Pollution Cleanup and Abatement Account, c/o Regional Water Quality Control Board at 1515 Clay Street, Oakland, CA 94612, within 30 days after the scheduled Hearing date. I understand that I am giving up my right to be heard, and to argue against the allegations made by the Assistant Executive Officer in this Complaint, and against the imposition of, or the amount of, the civil liability proposed unless the Water Board holds a hearing under either of the circumstances described above. If the Water Board holds such a hearing and imposes a civil liability, such amount shall be due 30 days from the date the Water Board adopts the order imposing the liability.

- Waiver of right to a hearing and agreement to make payment and undertake an SEP.
By checking the box, I agree to waive my right to a hearing before the Water Board with regard to the violations alleged in Complaint No. **R2-2008-0099**, and to complete a supplemental environmental project (SEP) in lieu of the suspended liability up to **\$50,000** and paying the balance of the fine to the State Water Pollution Cleanup and Abatement Account (CAA) within 30 days after the scheduled Hearing date. **The SEP proposal shall be submitted no later than April 29, 2009.** I understand that the SEP proposal shall conform to the requirements specified in the Policy on Supplemental Environmental Projects, which was adopted by the State Water Resources Control Board on February 3, 2009, and be subject to approval by the Assistant Executive Officer. If the SEP proposal, or its revised version, is not acceptable to the Assistant Executive Officer, I agree to pay the suspended penalty amount within 30 days of the date of the letter from the Assistant Executive Officer rejecting the proposed/revised SEP. I also understand that I am giving up my right to argue against the allegations made by the Assistant Executive Officer in the Complaint, and against the imposition of, or the amount of, the civil liability proposed unless the Water Board holds a hearing under either of the circumstances described above. If the Water Board holds such a hearing and imposes a civil liability, such amount shall be due 30 days from the date the Water Board adopts the order imposing the liability. I further agree to satisfactorily complete the approved SEP within a time schedule set by the Assistant Executive Officer. I understand failure to adequately complete the approved SEP will require immediate payment of the suspended liability to the CAA.

Waiver of right to a hearing within the 90-day hearing requirement in order to extend the hearing date.

By checking this box, I hereby waive my right to have a hearing before the Regional Water Board within 90 days after service of the Complaint, but I reserve the right to have a hearing in the future. I agree to promptly engage the Regional Water Board prosecution staff in discussions to resolve the outstanding violation(s). By checking this box, the Discharger requests that the Regional Water Board delay the hearing so that the Discharger and the prosecution team can discuss settlements. It remains within the discretion of the Regional Water Board to agree to delay the hearing.

_____	_____
Name (print)	Signature
_____	_____
Date	Title/Organization

Exhibit "A"

SFPUC Crystal Springs Pipeline No.2 at PG&E Martin Service Center
3200 Geneva Avenue, Daly City, San Mateo County
Some of the Pipeline Spill Discharged Pollutants

Table 1 Permit Effluent Limitations Violations

Date Occurred	Pollutant Description	Effluent Limitation Description (Unit)	Effluent Limit	Reported Value	Percent Pollutant is over Permit Limit	Type of Violation	CWC Section 13385(h)&(i) Required MMP
1/2/07	pH	Instantaneous Minimum (pH unit)	6.5	6.04	N/A	C1	
1/4/07	TPHd	Daily maximum (µg/L)	50	52	Group II = 4	C2	
1/6/07	TPHd	Daily maximum (µg/L)	50	73	Group II = 46	S, C3	\$3,000
1/8/07	TPHd	Daily maximum (µg/L)	50	140	Group II = 1,80	S, C4	\$3,000
1/8/07	TPHg	Daily maximum (µg/L)	50	85	Group II = 75	S, C5	\$3,000
1/08/07	Benzene	Daily maximum (µg/L)	5	7	Group II = 40	S, C6	\$3,000
1/8/07	Toluene	Daily maximum (µg/L)	5	7.2	Group II = 44	S, C7	\$3,000
1/8/07	Xylenes	Daily maximum (µg/L)	5	7.7	Group II = 54	S, C8	\$3,000
1/9/07	TPHd	Daily maximum (µg/L)	50	120	Group II = 140	S, C9	\$3,000
1/9/07	TPHg	Daily maximum (µg/L)	50	57	Group II = 14	C10	\$3,000
1/10/07	TPHd	Daily maximum (µg/L)	50	70	Group II = 40	S, C11	\$3,000
1/10/07	TPHg	Daily maximum (µg/L)	50	64	Group II = 28	S, C12	\$3,000
1/11/07	TPHd	Daily maximum (µg/L)	50	70	Group II = 40	S, C13	\$3,000
1/11/07	TPHg	Daily maximum (µg/L)	50	130	Group II = 160	S, C14	\$3,000
1/11/07	Benzene	Daily maximum (µg/L)	5	11	Group II = 120	S, C15	\$3,000
1/11/07	Toluene	Daily maximum (µg/L)	5	12	Group II = 140	S, C16	\$3,000
1/11/07	Xylenes	Daily maximum (µg/L)	5	12	Group II = 140	S, C17	\$3,000
Total CWC Section 13385(h)&(i) required MMP							\$45,000
Legend for above Table CWC = California Water Code, MMP = Mandatory Minimum Penalty, C = Count – The number that follows represents the number of violations the Discharger has had in the past 180 days. A count of C4 or higher means that a penalty under Water Code Section 13385(i) applies. S = Serious, which means that a penalty under Water Code Section 13385(h) applies when an effluent limitation is exceeded 40% or more for a Group I pollutant or 20% or more for a Group II pollutant.							

Table 2 Permit Discharge Prohibition Violation (Total Chlorine in mg/L)

Date Occurred	Reported Value	Date Occurred (cont'd)	Reported Value	Date Occurred (cont'd)	Reported Value
12/29/06	0.1	1/2/07	1.3	1/6/07	0.37
12/30/06	0.42	1/3/07	0.30	1/8/07	0.15
12/31/06	0.40	1/4/07	0.14	1/9/07	0.48
1/1/07	0.47	1/5/07	1.3	1/11/07	2.4