

**Orellana, Lucio@Waterboards**

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**From:** Drabandt, Laura@Waterboards  
**Sent:** Monday, August 11, 2014 8:53 AM  
**To:** Wyels, Wendy@Waterboards; Orellana, Lucio@Waterboards  
**Subject:** FW: Response of California Sprouts, LLC to RWQCB NOV and Draft ROV for Assessing MMPs  
**Attachments:** 8-8-14 Rsp2RWQCB re NOV&ROV (w\_Attchmts).pdf

FYI

*Laura J. Drabandt, Attorney  
Office of Enforcement  
State Water Resources Control Board  
1001 I Street, P.O. Box 100  
Sacramento, CA 95812  
(916) 341-5180*

---

**From:** Crystal Rivera [<mailto:crivera@somachlaw.com>]  
**Sent:** Friday, August 08, 2014 4:39 PM  
**To:** Morgan, Nichole@Waterboards  
**Cc:** Daniel J. Sholl; Steffanie Smith; Drabandt, Laura@Waterboards; Tess Dunham  
**Subject:** Response of California Sprouts, LLC to RWQCB NOV and Draft ROV for Assessing MMPs

Dear Ms. Morgan:

Attached please find Ms. Dunham's August 8, 2014, letter on behalf of California Sprouts, LLC. Thank you.



**Crystal Rivera**, *Secretary to Theresa "Tess" A. Dunham*  
500 Capitol Mall, Suite 1000 | Sacramento, CA 95814  
**Office** 916.446.7979 | **Direct** 916.469-3813 | **Fax** 916.446.8199 |  
[crivera@somachlaw.com](mailto:crivera@somachlaw.com)  
<http://www.somachlaw.com>

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500 CAPITOL MALL, SUITE 1000, SACRAMENTO, CA 95814  
OFFICE: 916-446-7979 FAX: 916-445-6199  
SOMACHLAW.COM

August 8, 2014

*Via Electronic Mail and Next Business Day Delivery*

Nichole Morgan  
Senior Water Resource Control Engineer  
NPDES Compliance and Enforcement Unit  
Central Valley Regional Water Quality Control Board  
11020 Sun Center Drive, #200  
Rancho Cordova, CA 95670

SUBJECT: Notice of Violation and Draft Record of Violations for Assessing Mandatory Minimum Penalties, California Sprouts, LLC, Sacramento, Sacramento County

Dear Ms. Morgan:

On behalf of California Sprouts, LLC, we have received the draft Record of Violations (ROV) for late reporting violations that occurred between 30 April 2012 and 31 March 2014, which was included in your letter of July 25, 2014. Based on our review of the draft ROV, we are providing our comments as you requested. Our comments here are specific to the accuracy of the draft ROV and calculated mandatory minimum penalties. Our response to the Self-Monitoring Report Reviews and Notice of Violation letter, also dated July 25, 2014, will be submitted separately by August 15, 2014, pursuant to your request in that communication.

As a preliminary matter, California Sprouts, LLC sincerely regrets its failure to timely file its quarterly Self Monitoring Reports (SMRs). As shown in the quarterly SMRs that have since been filed, and which are discussed further below, California Sprouts, LLC has substantially complied with its monitoring obligations as required by the applicable orders. Unfortunately, however, the SMRs were not timely filed. California Sprouts, LLC understands the severity of this situation and is taking all necessary steps to prevent such failures from occurring in the future. In the meantime, the proposed mandatory minimum penalties for failing to file these reports are significant, and will have a serious economic consequence on California Sprouts, LLC. It is likely that a fine assessed at this level will cause this small business to close its doors, leaving 25 people without employment. Considering the circumstances presented here, California Sprouts, LLC hopes that it can work with the Central Valley Regional Water Quality Control Board (Central Valley Water Board) to eliminate some of the mandatory minimum penalties assessed, and to provide the Central Valley Water Board with appropriate assurances that such untimely filings will not reoccur in the future.

Ms. Nichole Morgan  
Re: NOV, California Sprouts, LLC  
August 8, 2014  
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To that end, we have provided our response to the draft ROV here, and have provided justification for eliminating some of the proposed mandatory minimum penalties.

### Second Quarter 2012

Based on our review of our records, it appears that the Second Quarter 2012 SMR was required by a previous individual NPDES permit, Order No. R5-2005-0034, if quarterly samples were taken prior to June 7, 2012. After June 7, 2012, Order No. R5-2005-0034 was rescinded and California Sprouts, LLC become subject to Order No. R5-2008-0082-027. (See Notice of Applicability (NOA) dated 3 May 2012, attached hereto as Attachment 1.) Under Order No. R5-2008-0082-027, monitoring requirements changed. In either case, a Second Quarter 2012 SMR was due on August 1, 2012.

Due to confusion associated with the rescission of the previous order, and application of the new order, the June monthly laboratory sample for electrical conductivity (which was required by Order No. R5-2008-0082-027) was not taken for the Second Quarter 2012. Because samples were not taken, again due to confusion with changing over to the newly applicable permit, a Second Quarter 2012 SMR was not submitted by August 1, 2012. California Sprouts, LLC received notice from Mr. Lucio Orellana on July 14, 2014, that the Second Quarter 2012 SMR had not been received. (See electronic correspondence from Mr. Lucio Orellana to Mr. Dan Sholl, attached hereto as Attachment 2.)<sup>1</sup> In response to Mr. Orellana's July 14, 2014 inquiry, a Second Quarter 2012 SMR was emailed on July 23, 2014. (See electronic communication from Dan Sholl to Lucio Orellana, July 23, 2014, attached hereto as Attachment 3.) Daily flow and pH records, beginning with April 1, 2012 through June 30, 2014, are attached to this correspondence. (Letter to Ann Palmer from Dan Sholl, August 8, 2014, attached hereto as Attachment 4.)

The draft ROV proposes to assess California Sprouts, LLC, for 24 violations specifically associated with the Second Quarter 2012 SMR. According to the draft ROV, this constitutes 24 30-day periods that are subject to mandatory minimum penalties. California Sprouts, LLC does not agree that each 30-day period should be subject mandatory minimum penalties. Under Water Code section 13385.1(b)(1), untimely reports "shall not be separately assessed for each 30-day period following the deadline for submitting the report . . ." if certain conditions are met. The specific conditions are that (1) the discharger did not previously receive a complaint, notice of violation, or notice of the obligation to file such a report; and (2) discharges during the covered period do not violate effluent limitations. Paragraph (1) of subsection (b) only applies if the discharge monitoring report is then filed within 30-days after receiving written notice from the State Water Resources Control Board, or in this case, the Central Valley Water Board.

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<sup>1</sup> California Sprouts, LLC received notice on June 4, 2014, from the Central Valley Water Board that quarterly reports beginning with third quarter of 2012 had not been received. However, notice regarding the second quarter of 2012 was not received until July 14, 2014.

Ms. Nichole Morgan  
Re: NOV, California Sprouts, LLC  
August 8, 2014  
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The January 1, 2014 sunset provision (Wat. Code, § 13385.1(b)(4)) does not preclude use of the provisions contained in subsection (b) for violations that occurred prior to January 1, 2014. The legislative intent behind subsection (b) was to assess dischargers that had not received notification of an enforcement action with a mandatory minimum penalty of \$3,000 per report for failures to file such reports timely. Such assessment would be on a one-time basis only, and any subsequent fines for failure to report would be assessed in accordance with other provisions of the law. (See, e.g., SB 1284 Senate Floor Analysis, attached hereto as Attachment 5.) The purpose behind subsection (b) was to allow for dischargers and the State and regional water boards the opportunity to address backlogs within the mandatory minimum penalty program, without causing undue economic hardship to many that had complied with permits but had otherwise failed to file timely quarterly reports. At the time that the legislation was adopted, it was believed that the January 2014 date would allow sufficient time for this backlog to be addressed. Unfortunately, based on the circumstances here, it does not appear that all backlogs were addressed during the period between adoption of SB 1284 and the January 1, 2014 sunset provision. Considering the intent of the legislation, it is appropriate to conclude that the sunset provision in Water Code section 13385.1(b)(4) applies to report violations that occurred after January 1, 2014, and that violations prior to that date fall within Water Code section 13385.1(b)(1), if the conditions are met.

With respect to the Second Quarter 2012 SMR, California Sprouts, LLC contends that the elements and conditions in Water Code section 13385.1(b)(1) are met. Specifically, California Sprouts, LLC did not receive notice of the violation until July 14, 2014. (See Attachment 2.) Upon receiving such notice, California Sprouts, LLC responded by providing the SMR on July 23, 2014. (See Attachment 3.) Based on the data and information available, the discharges did not violate applicable effluent limitations during this quarter. Further, based on review of previously submitted data and due to the nature of this facility and type of discharge, the effluent from this facility is of high quality. Thus, mandatory minimum penalties for failure to submit the Second Quarter 2012 SMR should not be separately assessed for each 30-day period, but should be assessed as one mandatory minimum penalty at \$3,000.

Accordingly, Attachment A to your July 25, 2014 letter, *Record of Violations for Assessing Mandatory Minimum Penalties* should be revised to show that the report is subject to one mandatory minimum penalty.

#### Third Quarter 2012 through Third Quarter 2013

For the third quarter of 2012, California Sprouts, LLC discharged under Order R5-2008-0082-027, which required California Sprouts, LLC, to monitor for total flow, electrical conductivity, pH, and whole effluent toxicity. The effluent limitations applicable to California Sprouts, LLC, include limitations for Acute Whole Effluent Toxicity and pH. No other effluent limitations apply to this facility. (See Attachment 1.)

Ms. Nichole Morgan  
Re: NOV, California Sprouts, LLC  
August 8, 2014  
Page 4

On June 4, 2014, California Sprouts, LLC received an electronic communication from Ms. Deidre Asay stating that based on the Central Valley Water Board's review of their records, they had not received quarterly reports starting with the third quarter of 2012 and ending with the first quarter of 2014. (Electronic email from Ms. Deidre Asay to Mr. Dan Sholl, June 4, 2014, attached hereto as Attachment 6.) On June 6, 2014, Mr. Sholl, General Manager for California Sprouts, LLC, responded and provided quarterly reports for the periods identified in the June 4, 2014 electronic communication. (See letters and reports attached hereto as Attachment 7.) The quarterly reports incorrectly identified an effluent limitation for electrical conductivity being applicable. Upon the effective date of Order No. R5-2008-0082-027 (i.e., June 7, 2012), no effluent limitation for electrical conductivity is applicable to this discharge. (See Attachment 1.) Daily flow and pH records are provided with this letter as Attachment 4. As stated in the quarterly SMRs filed on June 6, 2014, California Sprouts, LLC indicated, regrettably, that samples for electrical conductivity were not taken for July 2012, August 2012, and November 2012.

As indicated previously, under Water Code section 13385.1(b)(1), untimely reports shall not be separately assessed for each 30-day period as long as certain conditions are met. With respect to the Third Quarter 2012 SMR (3Q12), Fourth Quarter 2012 SMR (4Q12), First Quarter 2013 SMR (1Q13), Second Quarter 2013 SMR (2Q13), and Third Quarter 2013 SMR (3Q13), California Sprouts, LLC contends that the elements and conditions of Water Code section 13385.1(b) are met. Specifically, California Sprouts, LLC did not receive notice of the violations until June 4, 2014. (See Attachment 6.) Upon receiving such notice, California Sprouts, LLC responded by providing the missing SMRs by June 6, 2014. (Attachment 7.) Based on the data and information available, discharges did not violate applicable effluent limitations during these quarters. Thus, mandatory minimum penalties for failure to submit the 3Q12, 4Q12, 1Q13, 2Q13, and 3Q13 reports should not be separately assessed for each 30-day period, but should be assessed as one mandatory minimum penalty of \$3,000 per report, totally \$15,000 for the five quarterly SMRs discussed here.

Accordingly, Attachment A to your July 25, 2014 letter, *Record of Violations for Assessing Mandatory Minimum Penalties* should be revised to show that each SMR identified for these quarters is subject to one mandatory minimum penalty.

#### Fourth Quarter 2013 through First Quarter 2014

For the Fourth Quarter 2013 SMR (4Q13) and First Quarter 2014 SMR (1Q14), and based on our understanding of the Water Code section 13385.1(b), it appears that the draft ROV is correct, and that the calculated mandatory minimum penalties for the number of 30-day periods for these SMRs is also correct.

Ms. Nichole Morgan  
Re: NOV, California Sprouts, LLC  
August 8, 2014  
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Conclusion

California Sprouts, LLC respectfully requests that the draft ROV be revised to indicate that the number of serious violations subject to mandatory minimum penalties for this facility is 11—not 94. With this change, the amount of the proposed mandatory minimum penalties would change from \$282,000 to \$33,000. We look forward to meeting with you and other Central Valley Water Board staff to discuss this situation, and to seek a mutually agreeable result to this unfortunate situation. Please contact me at (916) 446-7979, or Dan Sholl at (916) 381-6054, if you have any questions.

Thank you.

Sincerely,



Theresa A. Dunham

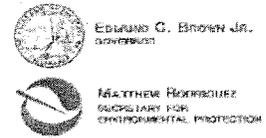
Attachments

cc (via electronic mail only):

Daniel J. Sholl  
Steffanie Smith  
Laura Drabandt

TAD:cr

# **ATTACHMENT 1**



**Central Valley Regional Water Quality Control Board**

3 May 2012

CERTIFIED MAIL  
7011 2970 0003 8939 1118

Daniel J. Sholl, General Manager  
California Sprouts, LLC  
5640 Warehouse Way  
Sacramento, CA 95819

**NOTICE OF APPLICABILITY (NOA); LIMITED THREAT GENERAL WASTE DISCHARGE REQUIREMENTS ORDER R5-2008-0082 (GENERAL ORDER); CALIFORNIA SPROUTS, LLC, SACRAMENTO COUNTY**

Our office received a Report of Waste Discharge application dated 25 January 2012 from the California Sprouts, LLC (hereinafter Discharger and Facility), for discharge of process water to surface water. Based on the application packet and subsequent information submitted by the Discharger, Central Valley Regional Water Quality Control Board (Central Valley Water Board) staff has determined that the project meets the required conditions for approval under the General Order for Limited Threat Discharges of Treated/Untreated Groundwater from Cleanup Sites, Wastewater from Superchlorination Projects, and Other Limited Threat Wastewaters to Surface Water (Limited Threat General Order). This project is hereby assigned Limited Threat General Order R5-2008-0082-027 and National Pollutant Discharge Elimination System (NPDES) Permit No. CAG995002. Please reference your Limited Threat General Order number, **R5-2008-0082-027**, in your correspondence and submitted documents.

The Limited Threat General Order shall become effective on **7 June 2012**, when the existing individual NPDES permit for the Facility, Order R5- 2005-0034 (NPDES No. CA0082961, originally issued to Pacific Coast Sprouts Farm) is rescinded by a separate action of the Central Valley Water Board at its regularly scheduled Board meeting. The second Quarter 2012 monitoring report required by Order R5-2005-0034 shall contain monitoring results through 7 June 2012, and is due by 1 August 2012.

The Limited Threat General Order is enclosed, and may also be viewed at the following web address:

[http://www.waterboards.ca.gov/centralvalley/board\\_decisions/adopted\\_orders/general\\_orders/r5-2008-0082.pdf](http://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/general_orders/r5-2008-0082.pdf). You are urged to familiarize yourself with the contents of the entire document. The Limited Threat General Order prescribes mandatory discharge monitoring and reporting requirements. The project activities shall be operated in accordance with the requirements contained in this NOA and the Limited Threat General Order.

**PROJECT DESCRIPTION**

The Discharger owns and operates a mung bean sprouts farm located at 5640 Warehouse Way in Sacramento. A location map is provided in Enclosure A, which is included as part of this NOA. The Facility produces 3.5 million pounds per year of organic mung bean sprouts. Supply water is provided by an on-site water supply well. The water is used to irrigate and cool the bean sprouts during the growing stage and to wash the bean sprouts upon completion of the growing cycle.

KARL E. LONGLEY ScD, P.E., CHAIR | PAMELA C. CROFTON P.E., BCPE, EXECUTIVE OFFICER  
11020 Sun Center Drive #206, Rancho Cordova, CA 95670 | [www.waterboards.ca.gov/centralvalley](http://www.waterboards.ca.gov/centralvalley)



**ATTACHMENT 1**

The Facility may generate up to 60,000 gallons per day (gpd) of flow through wastewater from irrigation and bean sprouts cooling. No chemicals are used in the growing process. A schematic of the process flow is included in Enclosure B, incorporated herein and made part of this NOA.

Wash water is produced during washing of equipment used for sprout growing. A small amount of chlorine is used during equipment cleaning. Therefore, all wash water is discharged directly to the City of Sacramento sanitary sewer.

Process water from growing sprouts is discharged into the City of Sacramento storm drain system. Waters in the storm drain system are collected in a sump and then pumped to an open storm drain channel that carries the discharge and other runoff within the drainage area approximately one to two miles prior to discharging to Morrison Creek, a water of the United States and a tributary to the Sacramento-San Joaquin Delta.

#### **CALIFORNIA TOXIC RULE / STATE IMPLEMENTATION POLICY MONITORING**

The Limited Threat General Order incorporates the requirements of the California Toxic Rule (CTR) and the State Water Resources Control Board's (State Water Board), *Policy for Implementation of Toxic Standards for Inland Surface Waters, Enclosed Bays, and Estuaries of California*, 2005, also known as the State Implementation Policy (SIP).

Screening levels for CTR constituents are found in Attachment B of the Limited Threat General Order. Review of the effluent water quality data in comparison to the CTR screening values, showed no reasonable potential for the discharge to cause or contribute to an exceedence of the CTR water quality objectives in Morrison Creek. Therefore, no screening level requirements for priority pollutants are included in this NOA.

#### **EFFLUENT LIMITATIONS**

Effluent limitations are specified in Section V. EFFLUENT LIMITATIONS AND DISCHARGE SPECIFICATIONS of the Limited Threat General Order. The following effluent limitations are applicable to this discharge and are contained in Section V. A and V. B of the Limited Threat General Order:

##### **Effluent Limitations – Applicable to All Limited Threat Discharges**

**V.A.2. Acute Whole Effluent Toxicity.** Survival of aquatic organisms in 96-hour bioassays of undiluted waste for all limited threat discharges shall be no less than:

- a. 70%, minimum for any one bioassay; and
- b. 90%, median for any three consecutive bioassays.

##### **Effluent Limitations – Limited Threat Dischargers to Specific Waterbodies**

**V.B.4.** The pH of all limited threat discharges within the Sacramento and San Joaquin River Basins (except Goose Creek) shall at all times be within the range of 6.5 and 8.5.

#### **MONITORING AND REPORTING**

Monitoring and reporting requirements are contained in Attachment E of the Limited Threat General Order. The Discharger is required to comply with the following monitoring and reporting requirements for the effluent and receiving water as specified in Attachment E of the Limited Threat General Order.

**Effluent Monitoring** – The Discharger shall monitor the effluent as required in Table E-2 for Total Flow, Electrical Conductivity @ 25°C, pH, and Whole Effluent Toxicity. All effluent samples shall be collected prior to discharge at EFF-001 (from the last drain in the growing-room through which the process effluent can be admitted into the City of Sacramento storm drain system - as shown in Enclosure B, a part of this NOA)

**Receiving Water Monitoring** – None required.

Monitoring in accordance with the Limited Threat General Order shall begin on **7 June 2012**. Monitoring reports shall be submitted to the Central Valley Water Board on a quarterly basis, and shall begin with the third Quarter 2012 self-monitoring report (due by 1 November 2012), which will include monitoring required as of the effective date of this NOA. Quarterly self-monitoring reports must be submitted until your coverage is formally terminated in accordance with the Limited Threat General Order, even if there is no discharge or receiving water flow during the reporting quarter.

The lower section of the Morrison Creek from the storm drain toward the Delta has been identified as a Water Quality Limited Segment for diazinon, pentachlorophenol, pyrethroids and sediment toxicity in Clean Water Act 303(d) List of impaired water bodies. The Discharger reports that the Facility does not use any pesticides or organic chemicals in the Facility's operations that are expected to contribute to an increase in the diazinon, pentachlorophenol, pyrethroids or sediment concentration to the Morrison Creek. Therefore, no additional effluent limitations or monitoring requirements are added to this NOA.

#### **SATISFACTION OF ANTI-BACKSLIDING REQUIREMENTS**

The effluent limitations in this NOA are at least as stringent as the effluent limitations in the previous individual NPDES permit, Order R5-2005-0034, with the exception of limitations for BOD<sub>5</sub>, Total Suspended Solids, Total Residual Chlorine, Arsenic, Fluoride, Nitrate (as N), and Electrical Conductivity.

The previous Order included effluent limits for BOD<sub>5</sub>, Total Suspended Solids, Arsenic, Fluoride, Nitrate (as N), and Electrical Conductivity. Based on the Discharger's last five years of effluent monitoring data for these constituents, the discharge does not demonstrate reasonable potential to cause or contribute to an instream excursion of the applicable water quality objectives in the receiving water. All samples were well below the effluent limitations. Therefore, the effluent limits for BOD<sub>5</sub>, Total Suspended Solids, Arsenic, Fluoride, Nitrate (as N), and Electrical Conductivity have not been included in this NOA.

The previous Order also included daily maximum and monthly average effluent limits for total chlorine residual. The Discharger no longer uses chlorine in the bean growing process. However, a small amount of chlorine is used during equipment cleaning. But all wash water from equipment cleaning is discharged directly to the City of Sacramento sanitary sewer. Therefore, no chlorine is discharged to surface water and based on the Discharger's last five years of effluent data, the discharge does not demonstrate reasonable potential to cause or contribute to an instream excursion of the applicable water quality objectives in the receiving water.

The less stringent requirements for BOD<sub>5</sub>, Total Suspended Solids, Total Residual Chlorine, Arsenic, Fluoride, Nitrate (as N), and Electrical Conductivity are consistent with the federal antibracksliding regulations, because the new data represents new information that was not available at the time the previous Order was adopted. The removal of these effluent limits for the discharge is consistent with state and federal antibracksliding requirements and is also consistent

with the antidegradation provisions of 40 CFR 131.12. Any impact on existing water quality will be insignificant.

#### **GENERAL INFORMATION AND REQUIREMENTS**

The Central Valley Water Board shall be notified immediately if any effluent limit violation is observed during implementation of the project.

Discharge of material other than what is described in the application is prohibited. The required annual fee (as specified in the annual billing you will receive from the State Water Resources Control Board) shall be submitted until this NOA is officially terminated. You must notify this office in writing when the discharge regulated by the Limited Threat General Order is no longer necessary. If a timely written request is not received, the Discharger will be required to pay additional annual fees as determined by the State Water Resources Control Board.

#### **ENFORCEMENT**

Failure to comply with the Limited Threat General Order may result in enforcement actions, which could include civil liability. Effluent limitation violations are subject to a Mandatory Minimum Penalty (MMP) of \$3,000 per violation. In addition, late monitoring reports may be subject to MMPs. When discharges do not occur during a quarterly monitoring period, the Discharger must still submit a quarterly monitoring report indicating that no discharge occurred to avoid being subject to enforcement actions.

#### **COMMUNICATION**

All monitoring reports submittals and questions regarding compliance and enforcement shall be directed to Lucio Orellana of the Central Valley Water Board's NPDES Compliance and Enforcement Unit. Mr. Orellana can be reached at (916) 464-4660 or at [lorellana@waterboards.ca.gov](mailto:lorellana@waterboards.ca.gov).

Questions regarding the permitting aspects of your Limited Threat General Order, and written notification for termination of coverage under the Order, shall be directed to Mr. Anand Mamidi at (916) 464-4853 or at [amamidi@waterboards.ca.gov](mailto:amamidi@waterboards.ca.gov).

Any person aggrieved by this action of the Central Valley Water Board may petition the State Water Board to review the action in accordance with California Water Code Section 13320 and California Code of Regulations, Title 23, Sections 2050 and following. The State Water Board must receive the petition by 5:00 p.m., 30 days after the date of this NOA, except that if the thirtieth day following the date of this Order falls on a Saturday, Sunday, or state holiday, the petition must be received by the State Water Board by 5:00 p.m. on the next business day.

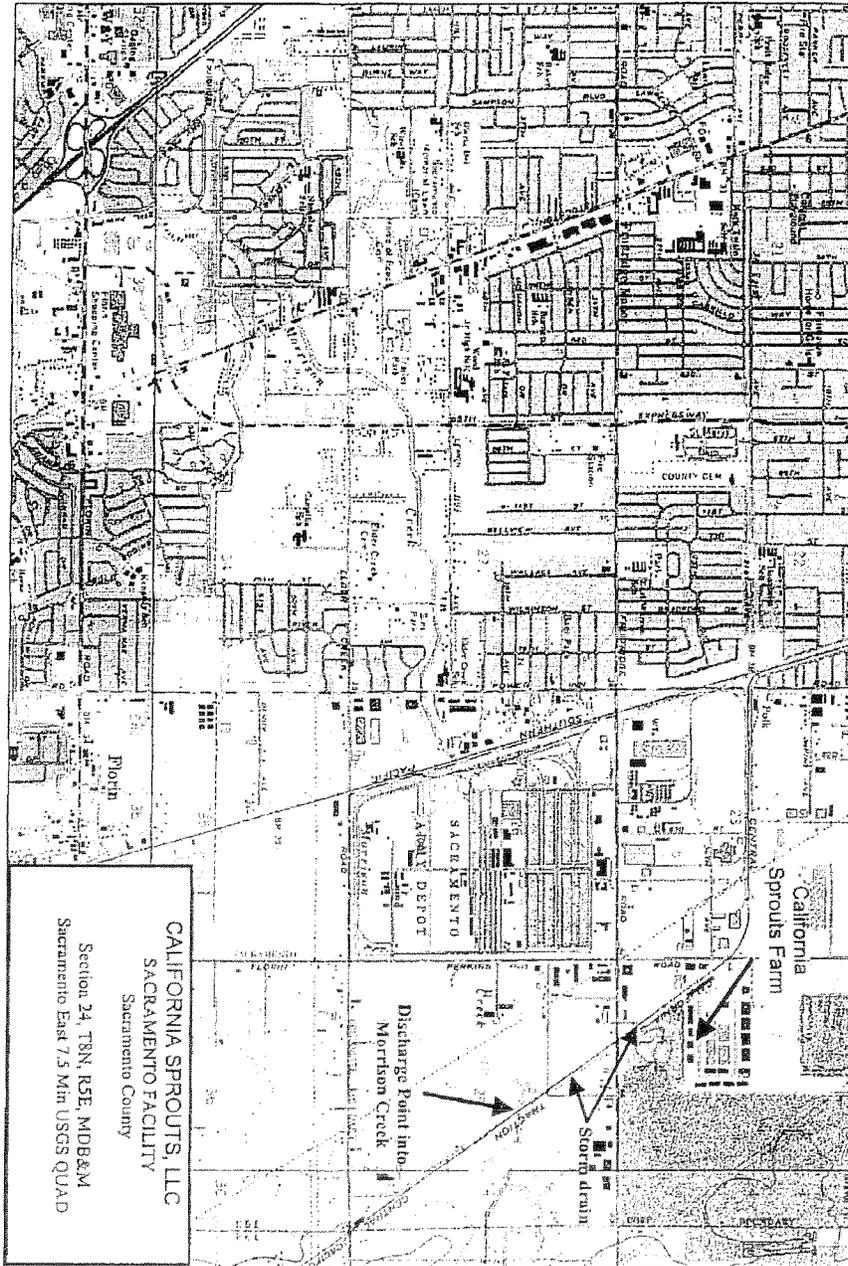
Copies of the law and regulations applicable to filing petitions may be found on the Internet at: [http://www.waterboards.ca.gov/public\\_notices/petitions/water\\_quality](http://www.waterboards.ca.gov/public_notices/petitions/water_quality) or will be provided upon request.

Pamela C. Creedon  
Executive Officer

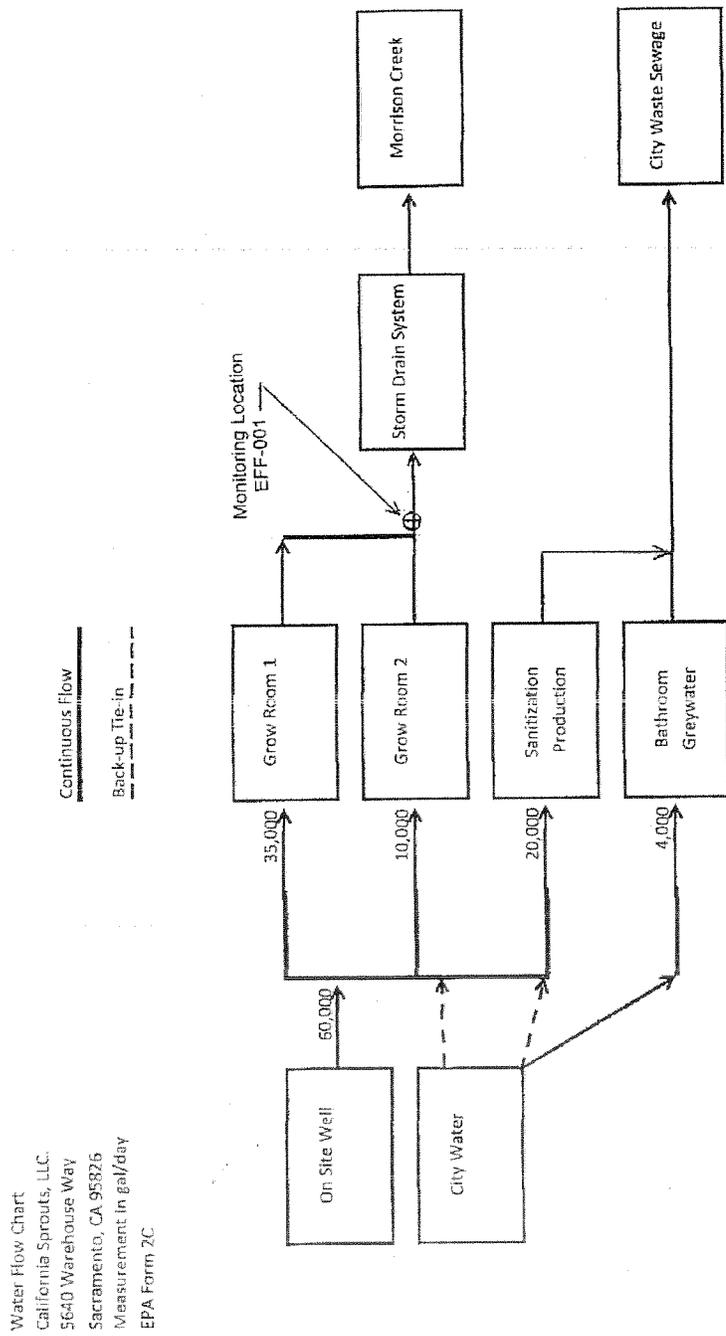
Enclosure: General Order R5-2008-0082 (Discharger only)

cc: David Smith, U.S. Environmental Protection Agency, Region IX, San Francisco  
Phil Isorena, Division of Water Quality, State Water Board, Sacramento

ENCLOSURE A – LOCATION MAP



**ENCLOSURE B – FLOW SCHEMATIC**



# **ATTACHMENT 2**

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**From:** Orellana, Lucio@Waterboards [<mailto:Lucio.Orellana@waterboards.ca.gov>]

**Sent:** Monday, July 14, 2014 1:37 PM

**To:** Dan Sholl

**Subject:** 2nd Quarter 2012 Report

Dan,

In looking at the records, we are also missing the 2<sup>nd</sup> Quarter 2012 report. Do you happen to have a copy of it? Also, is there a specific reason that the reports were not submitted by the due dates?

**Lucio Orellana**

Water Resources Control Engineer

NPDES Compliance and Enforcement Unit

California Regional Water Quality Control Board, Central Valley Region

11020 Sun Center Drive, #200

Rancho Cordova, CA 95670

Phone: (916) 464-4660

Fax: (916) 464-4681

# **ATTACHMENT 3**

Dan Sholl <dsholl@calsprouts.com>   
To: Tess Dunham <tdunham@somachlaw.com>  
FW: 2nd Quarter 2012 Report

August 7, 2014 3:01 PM

1 Attachment, 11 KB

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**From:** Dan Sholl  
**Sent:** Wednesday, July 23, 2014 3:13 PM  
**To:** 'Orellana, Lucio@Waterboards'  
**Subject:** RE: 2nd Quarter 2012 Report

Good afternoon Lucio,

Attached are the final numbers for Q2 2012. We did not conduct the Electric Conductivity Tests during that time. I believe that this was during the time of renewal of the permit and that our QC person did not know that this was to be done. We will be forwarding Q2 2014 to you momentarily. I can assure that this is now scheduled appropriately and with all tests completed. I will also mail a copy of the attached, when I mail in the Q2 2014 results.

Dan

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**From:** Orellana, Lucio@Waterboards [<mailto:Lucio.Orellana@waterboards.ca.gov>]  
**Sent:** Friday, July 18, 2014 2:32 PM  
**To:** Dan Sholl  
**Subject:** RE: 2nd Quarter 2012 Report

So there are no results for the 2Q 2012?

-Lucio

---

**From:** Dan Sholl [<mailto:dsholl@calsprouts.com>]  
**Sent:** Friday, July 18, 2014 2:28 PM  
**To:** Orellana, Lucio@Waterboards  
**Subject:** RE: 2nd Quarter 2012 Report

Good afternoon Lucio,

I have reviewed the paperwork and after looking through our records, it looks as if the Electric Conductivity Tests for Q2 2012 were not taken by the previous QC manager. That said, we have brought on a new employee that is managing this process and we are now taking these readings on

**ATTACHMENT 3**

the scheduled times. I can also say that the reports were not submitted due to this employee not focusing on this program. I sincerely apologize for this lack of timeliness and as you will see, we are not on top of getting these completed in the appropriate timeframe.

I will be submitting Q2 2014 next week to your office.

Thank you for your understanding

Dan

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**From:** Orellana, Lucio@Waterboards [<mailto:Lucio.Orellana@waterboards.ca.gov>]  
**Sent:** Monday, July 14, 2014 1:37 PM  
**To:** Dan Sholl  
**Subject:** 2nd Quarter 2012 Report

Dan,

In looking at the records, we are also missing the 2<sup>nd</sup> Quarter 2012 report. Do you happen to have a copy of it? Also, is there a specific reason that the reports were not submitted by the due dates?

**Lucio Orellana**  
Water Resources Control Engineer  
NPDES Compliance and Enforcement Unit  
California Regional Water Quality Control Board, Central Valley Region  
11020 Sun Center Drive, #200  
Rancho Cordova, CA 95670

Phone: (916) 464-4660  
Fax: (916) 464-4681

[NPDES Q2 2014.xlsx \(1\) KB](#)

Parameter	Concentration	Date Sampled	Effluent Limit	Lab Reporting Limit
Location	EFF-001		Monthly Average	
Sampling Date	2Q 2012			
Flow	4,275,150 gallons	Total Flow over Period		
Electrical Conductivity (EC) at 25° C	0.00 µmhos/cm	3/1/12	700 µmhos/cm	1.00 µmhos/cm
Electrical Conductivity (EC) at 25° C	0.00 µmhos/cm	4/1/12	700 µmhos/cm	1.00 µmhos/cm
Electrical Conductivity (EC) at 25° C	0.00 µmhos/cm	5/1/12	700 µmhos/cm	1.00 µmhos/cm
pH	7.3 SU		>6.5 and <8.5	
Average Water Temp	69.0 °F			

# **ATTACHMENT 4**



August 8, 2014

Ms. Ann Palmer  
California Regional Water Quality Control Board  
11020 Sun Center Drive, Suite 200  
Rancho Cordova, CA 95670

Re: California Sprouts, LLC. dba  
Pacific Coast Sprout Farms, Inc.  
Order No. R5-2008-0082-027  
Order No. R5-2013-0073-027  
NPDES Permit No. CAG995002  
Response to NOV Letter July 25, 2014

Dear Mrs. Palmer:

In accordance with Order No. R5-2008-0082-027 and R5-2013-0082-027 I am addressing the Notice of Violation letter Dated July 25, 2014. To address the Waste Discharge Requirements and Monitoring and Reporting Program, I have enclosed the daily results for pH and daily flow for the following Quarters: Q3 2012, Q4 2012, Q1 2013, Q2 2013, Q3 2013, Q4 2013, and Q1 2014.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

If you have any questions, or if the information submitted is not in accordance with the order, please contact me at (916) 381-6054 [dsholl@calsprouts.com](mailto:dsholl@calsprouts.com).

Sincerely,

Daniel J. Sholl  
General Manager  
California Sprouts, LLC

Enclosed

**ATTACHMENT 4**

08/05/14ds		Flow		pH		Date		Time		water usage per day (gal)		SU	
Date	Time	water usage per day (gal)	SU	Date	Time	water usage per day (gal)	SU	Date	Time	water usage per day (gal)	SU	Date	Time
Q2 2012													
Sunday, April 1, 12	7:40 AM	38,220	7.0	Thursday, May 17, 12	4:00AM	50,357	7.0						
Monday, April 2, 12	7:15 AM	38,180	7.0	Friday, May 18, 12	4:00AM	25,178	7.0						
Tuesday, April 3, 12	7:30 AM	46,830	7.0	Saturday, May 19, 12	1:00AM	25,178	7.0						
Wednesday, April 4, 12	2:45 PM	46,830	7.0	Sunday, May 20, 12	4:00AM	46,330	7.0						
Thursday, April 5, 12	9:25 AM	41,885	7.0	Monday, May 21, 12	4:00AM	46,330	7.0						
Friday, April 6, 12	3:45 PM	41,885	7.0	Tuesday, May 22, 12	5:30AM	46,330	7.0						
Saturday, April 7, 12	1:30 PM	45,920	7.0	Wednesday, May 23, 12	4:00AM	45,825	7.0						
Sunday, April 8, 12	4:35 AM	20,625	7.0	Thursday, May 24, 12	4:00AM	45,825	7.0						
Monday, April 9, 12	11:05 AM	20,625	7.0	Friday, May 25, 12	4:00AM	45,825	7.0						
Tuesday, April 10, 12	8:35 AM	79,900	7.0	Saturday, May 26, 12	1:00AM	45,825	7.0						
Wednesday, April 11, 12	3:00 PM	36,880	7.0	Sunday, May 27, 12	4:00AM	49,930	7.0						
Thursday, April 12, 12	7:00 AM	49,660	7.0	Monday, May 28, 12	4:00AM	49,930	7.0						
Friday, April 13, 12	3:00 PM	49,660	7.0	Tuesday, May 29, 12	4:00AM	47,350	7.0						
Saturday, April 14, 12	7:00 AM	54,850	7.0	Wednesday, May 30, 12	3:30AM	47,350	7.0						
Sunday, April 15, 12	5:00 PM	43,975	7.0	Thursday, May 31, 12	5:00AM	54,040	7.0						
Monday, April 16, 12	8:20 AM	43,975	7.0	Friday, June 1, 12	4:00AM	49,670	7.0						
Tuesday, April 17, 12	8:00 AM	60,300	7.0	Saturday, June 2, 12	5:00AM	49,560	7.0						
Wednesday, April 18, 12	4:25 AM	35,940	7.0	Sunday, June 3, 12	7:00AM	31,750	7.0						
Thursday, April 19, 12	6:35 AM	48,960	7.0	Monday, June 4, 12	3:00AM	55,710	7.0						
Friday, April 20, 12	7:30 AM	48,960	7.0	Tuesday, June 5, 12	4:00AM	49,630	7.0						
Saturday, April 21, 12	9:35 AM	55,890	7.0	Wednesday, June 6, 12	3:00AM	49,630	7.0						
Sunday, April 22, 12	9:40 AM	45,130	7.0	Thursday, June 7, 12	5:00AM	55,330	7.0						
Monday, April 23, 12	6:50 AM	41,470	7.0	Friday, June 8, 12	3:00AM	49,800	7.0						
Tuesday, April 24, 12	8:20 AM	45,315	7.0	Saturday, June 9, 12	5:00AM	50,030	7.0						
Wednesday, April 25, 12	4:07 AM	45,315	7.0	Sunday, June 10, 12	4:00AM	43,850	7.0						
Thursday, April 26, 12	6:08 AM	44,145	7.0	Monday, June 11, 12	4:00AM	43,850	7.0						
Friday, April 27, 12	4:15 AM	44,145	7.0	Tuesday, June 12, 12	4:00AM	52,583	7.0						
Saturday, April 28, 12	6:15 AM	49,850	7.0	Wednesday, June 13, 12	4:00AM	52,583	7.0						
Sunday, April 29, 12	3:25 PM	43,895	7.0	Thursday, June 14, 12	6:00AM	52,583	7.0						
Monday, April 30, 12	10:40 AM	43,895	7.0	Friday, June 15, 12	4:00 AM	40,580	7.0						
Tuesday, May 1, 12	6:20 AM	50,357	7.0	Saturday, June 16, 12	4:15AM	40,470	7.0						
Wednesday, May 2, 12	4:00AM	50,357	7.0	Sunday, June 17, 12	4:00AM	34,605	7.0						
Thursday, May 3, 12	4:00AM	50,357	7.0	Monday, June 18, 12	3:00 AM	34,605	7.0						
Friday, May 4, 12	4:00AM	50,357	7.0	Tuesday, June 19, 12	6:30 AM	45,540	7.0						
Saturday, May 5, 12	4:00AM	50,357	7.0	Wednesday, June 20, 12	3:00 AM	29,070	7.0						
Sunday, May 6, 12	4:00AM	50,357	7.0	Thursday, June 21, 12	5:00 AM	42,850	7.0						
Monday, May 7, 12	4:00AM	50,357	7.0	Friday, June 22, 12	8:00 AM	46,210	7.0						
Tuesday, May 8, 12	4:00AM	50,357	7.0	Saturday, June 23, 12	12:50 PM	45,360	7.0						
Wednesday, May 9, 12	4:00AM	50,357	7.0	Sunday, June 24, 12	7:00AM	50,030	7.0						
Thursday, May 10, 12	4:00AM	50,357	7.0	Monday, June 25, 12	4:00 AM	51,690	7.0						
Friday, May 11, 12	4:00AM	50,357	7.0	Tuesday, June 26, 12	6:00 AM	54,690	7.0						
Saturday, May 12, 12	4:00AM	50,357	7.0	Wednesday, June 27, 12	12:00 AM	40,380	7.0						
Sunday, May 13, 12	4:00AM	50,357	7.0	Thursday, June 28, 12	12:30 PM	39,720	7.0						
Monday, May 14, 12	4:00AM	50,357	7.0	Friday, June 29, 12	3:00 AM	47,600	7.0						
Tuesday, May 15, 12	4:00AM	50,357	7.0	Saturday, June 30, 12	5:00 AM	49,650	7.0						
Wednesday, May 16, 12	4:00AM	50,357	7.0										

Date	Time	Flow water usage per day (gal)	pH	Date	Time	water usage per day (gal)	SU
08/05/14tds							
Q3 2012							
Monday, July 1, 12	6:55 AM	42,900	7.0	Thursday, August 16, 12	4:00AM	50,650	7.0
Monday, July 2, 12	3:15 AM	32,440	7.0	Friday, August 17, 12	4:00AM	48,300	7.0
Tuesday, July 3, 12	1:00 AM	42,690	7.0	Saturday, August 18, 12	4:00AM	46,770	7.0
Wednesday, July 4, 12	12:30 PM	36,940	7.0	Sunday, August 19, 12	4:00AM	41,560	7.0
Thursday, July 5, 12	4:00 AM	51,340	7.0	Monday, August 20, 12	4:00AM	41,560	7.0
Friday, July 6, 12	12:30AM	33,940	7.0	Tuesday, August 21, 12	4:00AM	40,665	7.0
Saturday, July 7, 12	2:00 AM	44,680	7.0	Wednesday, August 22, 12	3:00AM	40,665	7.0
Sunday, July 8, 12	4:00AM	38,095	7.0	Thursday, August 23, 12	3:00AM	44,360	7.0
Monday, July 9, 12	3:00 AM	38,095	7.0	Friday, August 24, 12	3:00AM	45,440	7.0
Tuesday, July 10, 12	1:00 AM	45,770	7.0	Saturday, August 25, 12	5:00AM	46,217	7.0
Wednesday, July 11, 12	3:30 AM	45,990	7.0	Sunday, August 26, 12	4:00AM	46,217	7.0
Thursday, July 12, 12	5:00 AM	50,340	7.0	Monday, August 27, 12	3:00AM	46,217	7.0
Friday, July 13, 12	3:00 AM	41,200	7.0	Tuesday, August 28, 12	4:00AM	45,855	7.0
Saturday, July 14, 12	2:00 AM	49,010	7.0	Wednesday, August 29, 12	4:00AM	45,855	7.0
Sunday, July 15, 12	7:45 AM	50,240	7.0	Thursday, August 30, 12	4:00AM	49,520	7.0
Monday, July 16, 12	3:00 AM	33,020	7.0	Friday, August 31, 12	4:00 AM	48,490	7.0
Tuesday, July 17, 12	1:00 AM	30,200	7.0	Saturday, September 1, 12	4:30AM	44,000	7.0
Wednesday, July 18, 12	3:30 AM	61,660	7.0	Sunday, September 2, 12	7:40AM	44,670	7.0
Thursday, July 19, 12	4:00 AM	53,420	7.0	Monday, September 3, 12	4:00AM	39,440	7.0
Friday, July 20, 12	4:15 AM	47,620	7.0	Tuesday, September 4, 12	4:00AM	44,770	7.0
Saturday, July 21, 12	1:00AM	41,340	7.0	Wednesday, September 5, 12	4:00AM	44,770	7.0
Sunday, July 22, 12	3:00AM	82,390	7.0	Thursday, September 6, 12	5:30AM	44,320	7.0
Monday, July 23, 12	4:00AM	25,935	7.0	Friday, September 7, 12	3:30AM	37,400	7.0
Tuesday, July 24, 12	4:00 AM	25,935	7.0	Saturday, September 8, 12	4:00AM	40,360	7.0
Wednesday, July 25, 12	3:00AM	37,100	7.0	Sunday, September 9, 12	4:00AM	37,895	7.0
Thursday, July 26, 12	5:00AM	59,690	7.0	Monday, September 10, 12	3:30AM	37,895	7.0
Friday, July 27, 12	11:00AM	36,340	7.0	Tuesday, September 11, 12	4:00AM	39,190	7.0
Saturday, July 28, 12	4:00AM	55,180	7.0	Wednesday, September 12, 12	4:00AM	39,190	7.0
Sunday, July 29, 12	4:00AM	47,847	7.0	Thursday, September 13, 12	4:00AM	35,015	7.0
Monday, July 30, 12	4:00AM	47,847	7.0	Friday, September 14, 12	3:00AM	35,015	7.0
Tuesday, July 31, 12	7:00AM	47,847	7.0	Saturday, September 15, 12	3:00AM	47,350	7.0
Wednesday, August 1, 12	5:00AM	37,620	7.0	Sunday, September 16, 12	4:00AM	30,345	7.0
Thursday, August 2, 12	4:00AM	43,900	7.0	Monday, September 17, 12	4:00AM	30,345	7.0
Friday, August 3, 12	6:00AM	43,900	7.0	Tuesday, September 18, 12	3:00AM	51,060	7.0
Saturday, August 4, 12	4:30AM	45,340	7.0	Wednesday, September 19, 12	3:00AM	27,460	7.0
Sunday, August 5, 12	4:00AM	45,735	7.0	Thursday, September 20, 12	4:00 AM	44,970	7.0
Monday, August 6, 12	5:30AM	45,735	7.0	Friday, September 21, 12	3:30AM	44,970	7.0
Tuesday, August 7, 12	12:00AM	31,650	7.0	Saturday, September 22, 12	4:00 AM	42,437	7.0
Wednesday, August 8, 12	12:00AM	54,010	7.0	Sunday, September 23, 12	4:00 AM	42,437	7.0
Thursday, August 9, 12	12:50AM	43,140	7.0	Monday, September 24, 12	3:00AM	42,437	7.0
Friday, August 10, 12	4:00AM	47,955	7.0	Tuesday, September 25, 12	4:00AM	57,110	7.0
Saturday, August 11, 12	5:00AM	47,955	7.0	Wednesday, September 26, 12	3:00AM	30,480	7.0
Sunday, August 12, 12	4:00AM	40,720	7.0	Thursday, September 27, 12	4:00 AM	42,625	7.0
Monday, August 13, 12	3:10AM	40,720	7.0	Friday, September 28, 12	3:00AM	42,625	7.0
Tuesday, August 14, 12	4:00AM	45,220	7.0	Saturday, September 29, 12	4:00 AM	40,747	7.0
Wednesday, August 15, 12	3:00AM	45,220	7.0	Sunday, September 30, 12	4:00 AM	40,747	7.0

08/05/14lds		Flow		pH		Date		Time		water usage per day (gal)		SU						
Date	Time	Flow	water usage per day (gal)	pH	SU	Date	Time	Flow	water usage per day (gal)	pH	SU	Date	Time	Flow	water usage per day (gal)	pH	SU	
04 2012																		
Monday, October 1, 12	3:00AM		40,747	7.0		Friday, November 16, 12	4:00AM					Friday, November 16, 12	4:00AM		44,910	7.0		
Tuesday, October 2, 12	1:00AM		41,390	7.0		Saturday, November 17, 12	4:00AM					Saturday, November 17, 12	4:00AM		44,840	7.0		
Wednesday, October 3, 12	3:00AM		39,390	7.0		Sunday, November 18, 12	4:00AM					Sunday, November 18, 12	4:00AM		44,840	7.0		
Thursday, October 4, 12	4:00AM		39,985	7.0		Monday, November 19, 12	4:00AM					Monday, November 19, 12	4:00AM		44,840	7.0		
Friday, October 5, 12	2:00AM		39,985	7.0		Tuesday, November 20, 12	4:00AM					Tuesday, November 20, 12	4:00AM		44,445	7.0		
Saturday, October 6, 12	4:00AM		38,883	7.0		Wednesday, November 21, 12	4:00AM					Wednesday, November 21, 12	4:00AM		44,445	7.0		
Sunday, October 7, 12	4:00AM		38,883	7.0		Thursday, November 22, 12	4:00AM					Thursday, November 22, 12	4:00AM		44,445	7.0		
Monday, October 8, 12	3:15AM		38,883	7.0		Friday, November 23, 12	4:00AM					Friday, November 23, 12	4:00AM		44,445	7.0		
Tuesday, October 9, 12	3:00AM		36,150	7.0		Saturday, November 24, 12	4:00AM					Saturday, November 24, 12	4:00AM		42,673	7.0		
Wednesday, October 10, 12	3:00AM		34,970	7.0		Sunday, November 25, 12	4:00AM					Sunday, November 25, 12	4:00AM		42,673	7.0		
Thursday, October 11, 12	4:30AM		77,480	7.0		Monday, November 26, 12	4:00AM					Monday, November 26, 12	4:00AM		42,673	7.0		
Friday, October 12, 12	4:00AM		29,225	7.0		Tuesday, November 27, 12	4:00AM					Tuesday, November 27, 12	4:00AM		41,945	7.0		
Saturday, October 13, 12	4:00AM		29,225	7.0		Wednesday, November 28, 12	4:20AM					Wednesday, November 28, 12	4:20AM		41,945	7.0		
Sunday, October 14, 12	4:00AM		29,225	7.0		Thursday, November 29, 12	4:00AM					Thursday, November 29, 12	4:00AM		42,010	7.0		
Monday, October 15, 12	4:30AM		29,225	7.0		Friday, November 30, 12	3:00AM					Friday, November 30, 12	3:00AM		42,010	7.0		
Tuesday, October 16, 12	4:00AM		44,270	7.0		Saturday, December 1, 12	4:00AM					Saturday, December 1, 12	4:00AM		40,527	7.0		
Wednesday, October 17, 12	4:30AM		42,430	7.0		Sunday, December 2, 12	4:00AM					Sunday, December 2, 12	4:00AM		40,527	7.0		
Thursday, October 18, 12	4:00AM		56,083	7.0		Monday, December 3, 12	4:00AM					Monday, December 3, 12	4:00AM		40,527	7.0		
Friday, October 19, 12	4:00AM		42,062	7.0		Tuesday, December 4, 12	8:00AM					Tuesday, December 4, 12	8:00AM		39,630	7.0		
Saturday, October 20, 12	4:00AM		42,062	7.0		Wednesday, December 5, 12	4:00AM					Wednesday, December 5, 12	4:00AM		39,750	7.0		
Sunday, October 21, 12	4:00AM		42,062	7.0		Thursday, December 6, 12	5:00AM					Thursday, December 6, 12	5:00AM		43,310	7.0		
Monday, October 22, 12	4:30AM		42,062	7.0		Friday, December 7, 12	3:30AM					Friday, December 7, 12	3:30AM		36,060	7.0		
Tuesday, October 23, 12	3:00AM		42,370	7.0		Saturday, December 8, 12	4:00AM					Saturday, December 8, 12	4:00AM		43,540	7.0		
Wednesday, October 24, 12	4:00AM		51,730	7.0		Sunday, December 9, 12	4:00AM					Sunday, December 9, 12	4:00AM		43,540	7.0		
Thursday, October 25, 12	4:00AM		46,455	7.0		Monday, December 10, 12	4:00AM					Monday, December 10, 12	4:00AM		43,540	7.0		
Friday, October 26, 12	4:00AM		46,455	7.0		Tuesday, December 11, 12	12:00AM					Tuesday, December 11, 12	12:00AM		46,030	7.0		
Saturday, October 27, 12	4:00AM		44,003	7.0		Wednesday, December 12, 12	4:00AM					Wednesday, December 12, 12	4:00AM		43,740	7.0		
Sunday, October 28, 12	4:00AM		44,003	7.0		Thursday, December 13, 12	5:00AM					Thursday, December 13, 12	5:00AM		47,640	7.0		
Monday, October 29, 12	4:00AM		44,003	7.0		Friday, December 14, 12	4:00AM					Friday, December 14, 12	4:00AM		42,300	7.0		
Tuesday, October 30, 12	2:00AM		48,850	7.0		Saturday, December 15, 12	4:00AM					Saturday, December 15, 12	4:00AM		43,158	7.0		
Wednesday, October 31, 12	4:00AM		42,110	7.0		Sunday, December 16, 12	4:00AM					Sunday, December 16, 12	4:00AM		43,158	7.0		
Thursday, November 1, 12	4:00AM		42,585	7.0		Monday, December 17, 12	4:00AM					Monday, December 17, 12	4:00AM		43,158	7.0		
Friday, November 2, 12	4:00AM		42,585	7.0		Tuesday, December 18, 12	4:00AM					Tuesday, December 18, 12	4:00AM		43,158	7.0		
Saturday, November 3, 12	1:00AM		40,840	7.0		Wednesday, December 19, 12	2:00AM					Wednesday, December 19, 12	2:00AM		43,158	7.0		
Sunday, November 4, 12	4:00AM		42,645	7.0		Thursday, December 20, 12	4:00AM					Thursday, December 20, 12	4:00AM		47,380	7.0		
Monday, November 5, 12	4:00AM		42,645	7.0		Friday, December 21, 12	3:00AM					Friday, December 21, 12	3:00AM		47,380	7.0		
Tuesday, November 6, 12	12:00AM		41,340	7.0		Saturday, December 22, 12	4:00AM					Saturday, December 22, 12	4:00AM		49,385	7.0		
Wednesday, November 7, 12	4:00AM		49,110	7.0		Sunday, December 23, 12	9:00AM					Sunday, December 23, 12	9:00AM		49,385	7.0		
Thursday, November 8, 12	4:00AM		45,575	7.0		Monday, December 24, 12	4:00AM					Monday, December 24, 12	4:00AM		41,143	7.0		
Friday, November 9, 12	4:00AM		45,575	7.0		Tuesday, December 25, 12	4:00AM					Tuesday, December 25, 12	4:00AM		41,143	7.0		
Saturday, November 10, 12	4:00AM		44,640	7.0		Wednesday, December 26, 12	4:30AM					Wednesday, December 26, 12	4:30AM		41,143	7.0		
Sunday, November 11, 12	4:00AM		44,640	7.0		Thursday, December 27, 12	4:00AM					Thursday, December 27, 12	4:00AM		46,990	7.0		
Monday, November 12, 12	4:00AM		44,640	7.0		Friday, December 28, 12	5:30AM					Friday, December 28, 12	5:30AM		46,990	7.0		
Tuesday, November 13, 12	12:00AM		44,250	7.0		Saturday, December 29, 12	4:00AM					Saturday, December 29, 12	4:00AM		42,115	7.0		
Wednesday, November 14, 12	4:00AM		47,030	7.0		Sunday, December 30, 12	5:00AM					Sunday, December 30, 12	5:00AM		42,115	7.0		
Thursday, November 15, 12	4:00AM		44,910	7.0		Monday, December 31, 12	4:00AM					Monday, December 31, 12	4:00AM		36,865	7.0		

08/05/14ds		Flow		pH		Date		Time		water usage per day (gal)		SU	
Date	Time	Flow water usage per day (gal)	SU	Date	Time	Flow water usage per day (gal)	SU	Date	Time	Flow water usage per day (gal)	SU	Date	Time
Q1 2013													
Tuesday, January 1, 13	4:00 AM	36,870	7.0	Friday, February 15, 13	4:00 AM			Friday, February 15, 13	4:00 AM	22,288	7.0	Friday, February 15, 13	4:00 AM
Wednesday, January 2, 13	6:00 AM	36,860	7.0	Saturday, February 16, 13	4:00 AM			Saturday, February 16, 13	4:00 AM	22,288	7.0	Saturday, February 16, 13	4:00 AM
Thursday, January 3, 13	8:00 AM	72,470	7.0	Sunday, February 17, 13	4:00 AM			Sunday, February 17, 13	4:00 AM	22,288	7.0	Sunday, February 17, 13	4:00 AM
Friday, January 4, 13	6:00 AM	39,780	7.0	Monday, February 18, 13	4:30 AM			Monday, February 18, 13	4:30 AM	22,288	7.0	Monday, February 18, 13	4:30 AM
Saturday, January 5, 13	4:00 AM	42,667	7.0	Tuesday, February 19, 13	4:00 AM			Tuesday, February 19, 13	4:00 AM	69,280	7.0	Tuesday, February 19, 13	4:00 AM
Sunday, January 6, 13	4:00 AM	42,667	7.0	Wednesday, February 20, 13	4:00 AM			Wednesday, February 20, 13	4:00 AM	40,705	7.0	Wednesday, February 20, 13	4:00 AM
Monday, January 7, 13	6:00 AM	42,667	7.0	Thursday, February 21, 13	4:00 AM			Thursday, February 21, 13	4:00 AM	40,705	7.0	Thursday, February 21, 13	4:00 AM
Tuesday, January 8, 13	9:30 PM	72,410	7.0	Friday, February 22, 13	4:00 AM			Friday, February 22, 13	4:00 AM	27,848	7.0	Friday, February 22, 13	4:00 AM
Wednesday, January 9, 13	4:00 AM	33,513	7.0	Saturday, February 23, 13	4:00 AM			Saturday, February 23, 13	4:00 AM	27,847	7.0	Saturday, February 23, 13	4:00 AM
Thursday, January 10, 13	4:00 AM	33,513	7.0	Sunday, February 24, 13	4:00 AM			Sunday, February 24, 13	4:00 AM	27,847	7.0	Sunday, February 24, 13	4:00 AM
Friday, January 11, 13	5:30 AM	33,513	7.0	Monday, February 25, 13	4:30 AM			Monday, February 25, 13	4:30 AM	27,848	7.0	Monday, February 25, 13	4:30 AM
Saturday, January 12, 13	4:00 AM	41,493	7.0	Tuesday, February 26, 13	7:00 AM			Tuesday, February 26, 13	7:00 AM	41,405	7.0	Tuesday, February 26, 13	7:00 AM
Sunday, January 13, 13	4:00 AM	41,493	7.0	Wednesday, February 27, 13	4:00 AM			Wednesday, February 27, 13	4:00 AM	41,405	7.0	Wednesday, February 27, 13	4:00 AM
Monday, January 14, 13	5:00 AM	41,493	7.0	Thursday, February 28, 13	12:00 AM			Thursday, February 28, 13	12:00 AM	46,103	7.0	Thursday, February 28, 13	12:00 AM
Tuesday, January 15, 13	4:00 AM	40,575	7.0	Friday, March 1, 13	4:00 AM			Friday, March 1, 13	4:00 AM	34,577	7.0	Friday, March 1, 13	4:00 AM
Wednesday, January 16, 13	5:40 AM	40,575	7.0	Saturday, March 2, 13	4:00 AM			Saturday, March 2, 13	4:00 AM	34,577	7.0	Saturday, March 2, 13	4:00 AM
Thursday, January 17, 13	12:00 AM	33,880	7.0	Sunday, March 3, 13	4:00 AM			Sunday, March 3, 13	4:00 AM	34,577	7.0	Sunday, March 3, 13	4:00 AM
Friday, January 18, 13	5:30 AM	45,650	7.0	Monday, March 4, 13	4:30 AM			Monday, March 4, 13	4:30 AM	34,577	7.0	Monday, March 4, 13	4:30 AM
Saturday, January 19, 13	4:00 AM	38,850	7.0	Tuesday, March 5, 13	7:00 AM			Tuesday, March 5, 13	7:00 AM	50,180	7.0	Tuesday, March 5, 13	7:00 AM
Sunday, January 20, 13	4:00 AM	38,850	7.0	Wednesday, March 6, 13	4:00 AM			Wednesday, March 6, 13	4:00 AM	35,240	7.0	Wednesday, March 6, 13	4:00 AM
Monday, January 21, 13	4:30 AM	38,850	7.0	Thursday, March 7, 13	6:30 AM			Thursday, March 7, 13	6:30 AM	35,240	7.0	Thursday, March 7, 13	6:30 AM
Tuesday, January 22, 13	12:00 AM	29,980	7.0	Friday, March 8, 13	4:00 AM			Friday, March 8, 13	4:00 AM	52,520	7.0	Friday, March 8, 13	4:00 AM
Wednesday, January 23, 13	4:00 AM	46,850	7.0	Saturday, March 9, 13	4:00 AM			Saturday, March 9, 13	4:00 AM	31,813	7.0	Saturday, March 9, 13	4:00 AM
Thursday, January 24, 13	4:00 AM	38,785	7.0	Sunday, March 10, 13	4:00 AM			Sunday, March 10, 13	4:00 AM	31,813	7.0	Sunday, March 10, 13	4:00 AM
Friday, January 25, 13	4:30 AM	38,785	7.0	Monday, March 11, 13	4:00 AM			Monday, March 11, 13	4:00 AM	31,813	7.0	Monday, March 11, 13	4:00 AM
Saturday, January 26, 13	4:00 AM	36,907	7.0	Tuesday, March 12, 13	5:00 AM			Tuesday, March 12, 13	5:00 AM	53,450	7.0	Tuesday, March 12, 13	5:00 AM
Sunday, January 27, 13	4:00 AM	36,907	7.0	Wednesday, March 13, 13	12:00 AM			Wednesday, March 13, 13	12:00 AM	20,840	7.0	Wednesday, March 13, 13	12:00 AM
Monday, January 28, 13	4:30 AM	36,907	7.0	Thursday, March 14, 13	10:00 AM			Thursday, March 14, 13	10:00 AM	59,080	7.0	Thursday, March 14, 13	10:00 AM
Tuesday, January 29, 13	12:00 AM	29,670	7.0	Friday, March 15, 2013	7:00 AM			Friday, March 15, 2013	7:00 AM	42,780	7.0	Friday, March 15, 2013	7:00 AM
Wednesday, January 30, 13	5:00 AM	44,860	7.0	Saturday, March 16, 13	4:00 AM			Saturday, March 16, 13	4:00 AM	35,480	7.0	Saturday, March 16, 13	4:00 AM
Thursday, January 31, 13	4:00 AM	37,710	7.0	Sunday, March 17, 13	7:30 AM			Sunday, March 17, 13	7:30 AM	35,480	7.0	Sunday, March 17, 13	7:30 AM
Friday, February 1, 13	4:30 AM	37,710	7.0	Monday, March 18, 13	5:00 AM			Monday, March 18, 13	5:00 AM	37,920	7.0	Monday, March 18, 13	5:00 AM
Saturday, February 2, 13	4:00 AM	42,047	7.0	Tuesday, March 19, 13	12:00 AM			Tuesday, March 19, 13	12:00 AM	40,050	7.0	Tuesday, March 19, 13	12:00 AM
Sunday, February 3, 13	4:00 AM	42,047	7.0	Wednesday, March 20, 13	4:00 AM			Wednesday, March 20, 13	4:00 AM	74,830	7.0	Wednesday, March 20, 13	4:00 AM
Monday, February 4, 13	4:30 AM	42,047	7.0	Thursday, March 21, 13	4:00 AM			Thursday, March 21, 13	4:00 AM	48,995	7.0	Thursday, March 21, 13	4:00 AM
Tuesday, February 5, 13	9:30 PM	73,870	7.0	Friday, March 22, 13	7:00 AM			Friday, March 22, 13	7:00 AM	48,995	7.0	Friday, March 22, 13	7:00 AM
Wednesday, February 6, 13	4:00 AM	33,720	7.0	Saturday, March 23, 13	4:00 AM			Saturday, March 23, 13	4:00 AM	37,280	7.0	Saturday, March 23, 13	4:00 AM
Thursday, February 7, 13	4:00 AM	33,720	7.0	Sunday, March 24, 13	4:00 AM			Sunday, March 24, 13	4:00 AM	37,280	7.0	Sunday, March 24, 13	4:00 AM
Friday, February 8, 13	5:00 AM	33,720	7.0	Monday, March 25, 13	4:00 AM			Monday, March 25, 13	4:00 AM	37,280	7.0	Monday, March 25, 13	4:00 AM
Saturday, February 9, 13	4:00 AM	43,760	7.0	Tuesday, March 26, 13	7:00 AM			Tuesday, March 26, 13	7:00 AM	50,100	7.0	Tuesday, March 26, 13	7:00 AM
Sunday, February 10, 13	4:00 AM	43,760	7.0	Wednesday, March 27, 13	4:00 AM			Wednesday, March 27, 13	4:00 AM	37,290	7.0	Wednesday, March 27, 13	4:00 AM
Monday, February 11, 13	4:30 AM	43,760	7.0	Thursday, March 28, 13	4:00 AM			Thursday, March 28, 13	4:00 AM	44,270	7.0	Thursday, March 28, 13	4:00 AM
Tuesday, February 12, 13	4:00 AM	43,795	7.0	Friday, March 29, 13	3:00 AM			Friday, March 29, 13	3:00 AM	44,270	7.0	Friday, March 29, 13	3:00 AM
Wednesday, February 13, 13	4:30 AM	43,795	7.0	Saturday, March 30, 13	4:00 AM			Saturday, March 30, 13	4:00 AM	41,553	7.0	Saturday, March 30, 13	4:00 AM
Thursday, February 14, 13	4:30 AM	89,150	7.0	Sunday, March 31, 13	4:00 AM			Sunday, March 31, 13	4:00 AM	41,553	7.0	Sunday, March 31, 13	4:00 AM

Date	Time	Flow water usage per day (gal)	pH	Date	Time	water usage per day (gal)	SU
08/05/14ds							
Q2 2013							
Monday, April 1, 13	4:00AM	41,553	7.0	Friday, May 17, 13	4:00AM	57,200	7.0
Tuesday, April 2, 13	7:00AM	47,133	7.0	Saturday, May 18, 13	4:00 AM	49,577	7.0
Wednesday, April 3, 13	4:00AM	47,133	7.0	Sunday, May 19, 13	4:00 AM	49,577	7.0
Thursday, April 4, 13	6:30AM	47,133	7.0	Monday, May 20, 13	4:00AM	49,577	7.0
Friday, April 05, 2013	4:00AM	35,780	7.0	Tuesday, May 21, 13	4:00 AM	49,265	7.0
Saturday, April 6, 13	4:00 AM	43,060	7.0	Wednesday, May 22, 13	4:00AM	49,265	7.0
Sunday, April 7, 13	4:00 AM	43,060	7.0	Thursday, May 23, 13	4:00AM	65,800	7.0
Monday, April 8, 13	4:30AM	43,060	7.0	Friday, May 24, 13	4:00AM	70,290	7.0
Tuesday, April 9, 13	4:00AM	52,790	7.0	Saturday, May 25, 13	4:00 AM	74,363	7.0
Wednesday, April 10, 13	6:00AM	41,760	7.0	Sunday, May 26, 13	4:00 AM	74,363	7.0
Thursday, April 11, 13	4:00 AM	41,755	7.0	Monday, May 27, 13	4:00AM	74,363	7.0
Friday, April 12, 13	5:00AM	41,755	7.0	Tuesday, May 28, 13	4:00 AM	78,280	7.0
Saturday, April 13, 13	4:00 AM	43,237	7.0	Wednesday, May 29, 13	4:00AM	78,280	7.0
Sunday, April 14, 13	4:00 AM	43,237	7.0	Thursday, May 30, 13	4:00AM	74,350	7.0
Monday, April 15, 13	4:00AM	43,237	7.0	Friday, May 31, 13	4:00 AM	82,430	7.0
Tuesday, April 16, 13	4:00AM	44,165	7.0	Saturday, June 1, 13	5:00AM	82,430	7.0
Wednesday, April 17, 13	4:00AM	44,165	7.0	Sunday, June 2, 13	4:00 AM	93,640	7.0
Thursday, April 18, 13	4:00 AM	44,715	7.0	Monday, June 3, 13	7:30AM	93,640	7.0
Friday, April 19, 13	4:00AM	44,715	7.0	Tuesday, June 4, 13	1:30AM	73,500	7.0
Saturday, April 20, 13	4:00 AM	46,533	7.0	Wednesday, June 5, 13	6:30AM	37,800	7.0
Sunday, April 21, 13	4:00 AM	46,533	7.0	Thursday, June 6, 13	6:00AM	37,800	7.0
Monday, April 22, 13	4:00AM	46,533	7.0	Friday, June 7, 13	4:00AM	72,470	7.0
Tuesday, April 23, 13	4:00 AM	39,445	7.0	Saturday, June 8, 13	4:00 AM	77,230	7.0
Wednesday, April 24, 13	6:00AM	39,445	7.0	Sunday, June 9, 13	4:00 AM	77,230	7.0
Thursday, April 25, 13	4:00 AM	43,785	7.0	Monday, June 10, 13	5:00AM	77,230	7.0
Friday, April 26, 13	4:00AM	43,785	7.0	Tuesday, June 11, 13	5:00AM	86,660	7.0
Saturday, April 27, 13	4:00 AM	39,557	7.0	Wednesday, June 12, 13	4:00AM	55,480	7.0
Sunday, April 28, 13	4:00 AM	39,557	7.0	Thursday, June 13, 13	4:00AM	89,370	7.0
Monday, April 29, 13	4:00AM	39,557	7.0	Friday, June 14, 13	4:00AM	70,210	7.0
Tuesday, April 30, 13	4:00AM	55,730	7.0	Saturday, June 15, 13	4:00 AM	76,670	7.0
Wednesday, May 1, 13	1:00AM	31,020	7.0	Sunday, June 16, 13	4:00 AM	76,670	7.0
Thursday, May 2, 13	4:00 AM	45,450	7.0	Monday, June 17, 13	4:00AM	76,670	7.0
Friday, May 3, 13	4:00AM	45,450	7.0	Tuesday, June 18, 13	4:00 AM	77,345	7.0
Saturday, May 4, 13	4:00 AM	44,730	7.0	Wednesday, June 19, 13	4:00AM	77,345	7.0
Sunday, May 5, 13	4:00 AM	44,730	7.0	Thursday, June 20, 13	4:00AM	72,980	7.0
Monday, May 6, 13	4:00AM	44,730	7.0	Friday, June 21, 13	4:00AM	69,500	7.0
Tuesday, May 7, 13	4:00 AM	42,675	7.0	Saturday, June 22, 13	4:00 AM	79,420	7.0
Wednesday, May 8, 13	4:00AM	42,675	7.0	Sunday, June 23, 13	4:00 AM	79,420	7.0
Thursday, May 9, 13	4:00 AM	42,725	7.0	Monday, June 24, 13	4:00AM	79,420	7.0
Friday, May 10, 13	4:00 AM	42,725	7.0	Tuesday, June 25, 13	5:00AM	79,550	7.0
Saturday, May 11, 13	4:00 AM	52,407	7.0	Wednesday, June 26, 13	4:00AM	62,740	7.0
Sunday, May 12, 13	4:00 AM	52,407	7.0	Thursday, June 27, 13	4:00AM	50,700	7.0
Monday, May 13, 13	4:00AM	52,407	7.0	Friday, June 28, 13	4:00AM	116,990	7.0
Tuesday, May 14, 13	4:00AM	50,890	7.0	Saturday, June 29, 13	4:00 AM	71,430	7.0
Wednesday, May 15, 13	4:00AM	46,150	7.0	Sunday, June 30, 13	4:00 AM	71,430	7.0
Thursday, May 16, 13	4:00AM	57,200	7.0				

08/05/14ds		Flow		pH		Date		Time		water usage per day (gal)		SU	
Date	Time	water usage per day (gal)	SU	Date	Time	water usage per day (gal)	SU	Date	Time	water usage per day (gal)	SU	Date	Time
Q3 2013													
Monday, July 1, 13	4:00AM	71,430	7.0	Friday, August 16, 13	4:00AM	51,637	7.0	Friday, August 16, 13	4:00AM	51,637	7.0	Friday, August 16, 13	4:00AM
Tuesday, July 2, 13	12:00AM	72,620	7.0	Saturday, August 17, 13	4:00AM	51,637	7.0	Saturday, August 17, 13	4:00AM	51,637	7.0	Saturday, August 17, 13	4:00AM
Wednesday, July 3, 13	4:00AM	71,120	7.0	Sunday, August 18, 13	4:00AM	78,039	7.0	Sunday, August 18, 13	4:00AM	78,039	7.0	Sunday, August 18, 13	4:00AM
Thursday, July 4, 13	12:00AM	78,940	7.0	Monday, August 19, 13	4:30AM	25,234	7.0	Monday, August 19, 13	4:30AM	25,234	7.0	Monday, August 19, 13	4:30AM
Friday, July 5, 13	2:00AM	61,480	7.0	Tuesday, August 20, 13	4:00AM	52,805	7.0	Tuesday, August 20, 13	4:00AM	52,805	7.0	Tuesday, August 20, 13	4:00AM
Saturday, July 6, 13	4:00 AM	71,767	7.0	Wednesday, August 21, 13	4:30AM	52,805	7.0	Wednesday, August 21, 13	4:30AM	52,805	7.0	Wednesday, August 21, 13	4:30AM
Sunday, July 7, 13	4:00 AM	71,767	7.0	Thursday, August 22, 13	4:00AM	44,490	7.0	Thursday, August 22, 13	4:00AM	44,490	7.0	Thursday, August 22, 13	4:00AM
Monday, July 8, 13	4:00AM	71,767	7.0	Friday, August 23, 13	4:00AM	39,530	7.0	Friday, August 23, 13	4:00AM	39,530	7.0	Friday, August 23, 13	4:00AM
Tuesday, July 9, 13	4:00AM	86,290	7.0	Saturday, August 24, 13	4:00AM	49,740	7.0	Saturday, August 24, 13	4:00AM	49,740	7.0	Saturday, August 24, 13	4:00AM
Wednesday, July 10, 13	4:00AM	48,840	7.0	Sunday, August 25, 13	4:00AM	49,740	7.0	Sunday, August 25, 13	4:00AM	49,740	7.0	Sunday, August 25, 13	4:00AM
Thursday, July 11, 13	4:00AM	59,510	7.0	Monday, August 26, 13	4:00AM	49,740	7.0	Monday, August 26, 13	4:00AM	49,740	7.0	Monday, August 26, 13	4:00AM
Friday, July 12, 13	4:00AM	56,300	7.0	Tuesday, August 27, 13	4:00AM	51,675	7.0	Tuesday, August 27, 13	4:00AM	51,675	7.0	Tuesday, August 27, 13	4:00AM
Saturday, July 13, 13	4:00 AM	75,527	7.0	Wednesday, August 28, 13	4:00AM	51,675	7.0	Wednesday, August 28, 13	4:00AM	51,675	7.0	Wednesday, August 28, 13	4:00AM
Sunday, July 14, 13	4:00 AM	75,527	7.0	Thursday, August 29, 13	4:00AM	39,830	7.0	Thursday, August 29, 13	4:00AM	39,830	7.0	Thursday, August 29, 13	4:00AM
Monday, July 15, 13	4:00AM	75,527	7.0	Friday, August 30, 13	5:30AM	48,240	7.0	Friday, August 30, 13	5:30AM	48,240	7.0	Friday, August 30, 13	5:30AM
Tuesday, July 16, 13	5:00AM	102,990	7.0	Saturday, August 31, 13	4:00AM	60,277	7.0	Saturday, August 31, 13	4:00AM	60,277	7.0	Saturday, August 31, 13	4:00AM
Wednesday, July 17, 13	4:00AM	53,410	7.0	Sunday, September 1, 13	4:00AM	60,277	7.0	Sunday, September 1, 13	4:00AM	60,277	7.0	Sunday, September 1, 13	4:00AM
Thursday, July 18, 13	4:00AM	83,590	7.0	Monday, September 2, 13	4:00AM	60,277	7.0	Monday, September 2, 13	4:00AM	60,277	7.0	Monday, September 2, 13	4:00AM
Friday, July 19, 13	4:00AM	68,760	7.0	Tuesday, September 3, 13	4:00AM	45,815	7.0	Tuesday, September 3, 13	4:00AM	45,815	7.0	Tuesday, September 3, 13	4:00AM
Saturday, July 20, 13	4:00AM	80,293	7.0	Wednesday, September 4, 13	4:04AM	45,815	7.0	Wednesday, September 4, 13	4:04AM	45,815	7.0	Wednesday, September 4, 13	4:04AM
Sunday, July 21, 13	4:00AM	80,293	7.0	Thursday, September 5, 13	5:30AM	44,970	7.0	Thursday, September 5, 13	5:30AM	44,970	7.0	Thursday, September 5, 13	5:30AM
Monday, July 22, 13	5:30AM	80,293	7.0	Friday, September 6, 13	6:30AM	45,810	7.0	Friday, September 6, 13	6:30AM	45,810	7.0	Friday, September 6, 13	6:30AM
Tuesday, July 23, 13	4:00AM	78,030	7.0	Saturday, September 7, 13	4:00AM	65,767	7.0	Saturday, September 7, 13	4:00AM	65,767	7.0	Saturday, September 7, 13	4:00AM
Wednesday, July 24, 13	4:00AM	78,030	7.0	Sunday, September 8, 13	4:00AM	65,767	7.0	Sunday, September 8, 13	4:00AM	65,767	7.0	Sunday, September 8, 13	4:00AM
Thursday, July 25, 13	4:00AM	28,720	7.0	Monday, September 9, 13	4:00AM	65,767	7.0	Monday, September 9, 13	4:00AM	65,767	7.0	Monday, September 9, 13	4:00AM
Friday, July 26, 13	4:00AM	57,950	7.0	Tuesday, September 10, 13	5:00AM	74,480	7.0	Tuesday, September 10, 13	5:00AM	74,480	7.0	Tuesday, September 10, 13	5:00AM
Saturday, July 27, 13	4:00AM	73,230	7.0	Wednesday, September 11, 13	4:00AM	50,120	7.0	Wednesday, September 11, 13	4:00AM	50,120	7.0	Wednesday, September 11, 13	4:00AM
Sunday, July 28, 13	4:00AM	73,230	7.0	Thursday, September 12, 13	4:00AM	50,910	7.0	Thursday, September 12, 13	4:00AM	50,910	7.0	Thursday, September 12, 13	4:00AM
Monday, July 29, 13	4:00AM	73,230	7.0	Friday, September 13, 13	4:00AM	40,210	7.0	Friday, September 13, 13	4:00AM	40,210	7.0	Friday, September 13, 13	4:00AM
Tuesday, July 30, 13	4:00AM	60,740	7.0	Saturday, September 14, 13	4:00AM	38,730	7.0	Saturday, September 14, 13	4:00AM	38,730	7.0	Saturday, September 14, 13	4:00AM
Wednesday, July 31, 13	4:00AM	90,780	7.0	Sunday, September 15, 13	4:00AM	38,730	7.0	Sunday, September 15, 13	4:00AM	38,730	7.0	Sunday, September 15, 13	4:00AM
Thursday, August 1, 13	4:00AM	30,790	7.0	Monday, September 16, 13	4:00AM	38,730	7.0	Monday, September 16, 13	4:00AM	38,730	7.0	Monday, September 16, 13	4:00AM
Friday, August 2, 13	4:00AM	59,320	7.0	Tuesday, September 17, 13	4:00AM	37,405	7.0	Tuesday, September 17, 13	4:00AM	37,405	7.0	Tuesday, September 17, 13	4:00AM
Saturday, August 3, 13	4:00AM	66,640	7.0	Wednesday, September 18, 13	4:00AM	37,405	7.0	Wednesday, September 18, 13	4:00AM	37,405	7.0	Wednesday, September 18, 13	4:00AM
Sunday, August 4, 13	4:00AM	66,640	7.0	Thursday, September 19, 13	4:00AM	40,860	7.0	Thursday, September 19, 13	4:00AM	40,860	7.0	Thursday, September 19, 13	4:00AM
Monday, August 5, 13	4:00AM	66,640	7.0	Friday, September 20, 13	4:00AM	44,280	7.0	Friday, September 20, 13	4:00AM	44,280	7.0	Friday, September 20, 13	4:00AM
Tuesday, August 6, 13	4:00AM	84,070	7.0	Saturday, September 21, 13	4:00AM	68,263	7.0	Saturday, September 21, 13	4:00AM	68,263	7.0	Saturday, September 21, 13	4:00AM
Wednesday, August 7, 13	4:00AM	46,395	7.0	Sunday, September 22, 13	4:00AM	68,263	7.0	Sunday, September 22, 13	4:00AM	68,263	7.0	Sunday, September 22, 13	4:00AM
Thursday, August 8, 13	4:00AM	46,395	7.0	Monday, September 23, 13	4:00AM	68,263	7.0	Monday, September 23, 13	4:00AM	68,263	7.0	Monday, September 23, 13	4:00AM
Friday, August 9, 13	5:00AM	41,580	7.0	Tuesday, September 24, 13	4:00AM	23,715	7.0	Tuesday, September 24, 13	4:00AM	23,715	7.0	Tuesday, September 24, 13	4:00AM
Saturday, August 10, 13	4:00AM	63,560	7.0	Wednesday, September 25, 13	6:00AM	23,715	7.0	Wednesday, September 25, 13	6:00AM	23,715	7.0	Wednesday, September 25, 13	6:00AM
Sunday, August 11, 13	4:00AM	63,560	7.0	Thursday, September 26, 13	6:00AM	99,520	7.0	Thursday, September 26, 13	6:00AM	99,520	7.0	Thursday, September 26, 13	6:00AM
Monday, August 12, 13	4:00AM	63,560	7.0	Friday, September 27, 13	6:00AM	44,100	7.0	Friday, September 27, 13	6:00AM	44,100	7.0	Friday, September 27, 13	6:00AM
Tuesday, August 13, 13	4:00AM	79,710	7.0	Saturday, September 28, 13	4:00AM	62,080	7.0	Saturday, September 28, 13	4:00AM	62,080	7.0	Saturday, September 28, 13	4:00AM
Wednesday, August 14, 13	4:00AM	51,637	7.0	Sunday, September 29, 13	4:00AM	62,080	7.0	Sunday, September 29, 13	4:00AM	62,080	7.0	Sunday, September 29, 13	4:00AM
Thursday, August 15, 13	4:00AM	51,637	7.0	Monday, September 30, 13	4:00AM	62,080	7.0	Monday, September 30, 13	4:00AM	62,080	7.0	Monday, September 30, 13	4:00AM

Date	Flow		pH	Date	Time	water usage per day (gal)	SU
	Time	water usage per day (gal)					
08/05/14ds							
Q4 2013							
Tuesday, October 1, 13	5:00AM	64,450	7.0	Saturday, November 16, 13	9:00AM	120,330	7.0
Wednesday, October 2, 13	4:00AM	23,510	7.0	Sunday, November 17, 13	7:00AM	41,770	7.0
Thursday, October 3, 13	4:00AM	38,310	7.0	Monday, November 18, 13	5:00AM	71,220	7.0
Friday, October 4, 13	4:00AM	37,950	7.0	Tuesday, November 19, 13	5:00AM	95,750	7.0
Saturday, October 5, 13	4:00AM	52,600	7.0	Wednesday, November 20, 13	6:00am	77,950	7.0
Sunday, October 6, 13	4:00AM	52,600	7.0	Thursday, November 21, 13	8:00am	73,180	7.0
Monday, October 7, 13	4:00AM	52,600	7.0	Friday, November 22, 13	5:00am	86,740	7.0
Tuesday, October 8, 13	5:00AM	46,500	7.0	Saturday, November 23, 13	7:00am	21,740	7.0
Wednesday, October 9, 13	5:00AM	61,560	7.0	Sunday, November 24, 13	7:00am	75,390	7.0
Thursday, October 10, 13	4:00AM	38,530	7.0	Monday, November 25, 13	5:00am	33,300	7.0
Friday, October 11, 13	4:00AM	44,310	7.0	Tuesday, November 26, 13	5:00am	37,510	7.0
Saturday, October 12, 13	4:00AM	68,960	7.0	Wednesday, November 27, 13	12:00am	30,740	7.0
Sunday, October 13, 13	4:00AM	68,960	7.0	Thursday, November 28, 13	12:30am	27,970	7.0
Monday, October 14, 13	4:00AM	68,960	7.0	Friday, November 29, 13	5:00am	59,670	7.0
Tuesday, October 15, 13	5:00AM	77,060	7.0	Saturday, November 30, 13	7:00am	57,260	7.0
Wednesday, October 16, 13	4:00AM	55,930	7.0	Sunday, December 1, 13	12:00am	34,680	7.0
Thursday, October 17, 13	4:00AM	46,940	7.0	Monday, December 2, 13	5:00am	33,380	7.0
Friday, October 18, 13	5:00AM	46,770	7.0	Tuesday, December 3, 13	5:00am	61,800	7.0
Saturday, October 19, 13	6:00AM	109,260	7.0	Wednesday, December 4, 13	9:00am	80,780	7.0
Sunday, October 20, 13	7:00AM	60,280	7.0	Thursday, December 5, 13	5:00am	84,490	7.0
Monday, October 21, 13	5:00AM	51,340	7.0	Friday, December 6, 13	9:00am	70,620	7.0
Tuesday, October 22, 13	12:00PM	67,350	7.0	Saturday, December 7, 13	6:00am	52,480	7.0
Wednesday, October 23, 13	5:00AM	52,170	7.0	Sunday, December 8, 13	6:30am	85,520	7.0
Thursday, October 24, 13	6:00AM	69,860	7.0	Monday, December 9, 13	4:00am	76,130	7.0
Friday, October 25, 13	4:00AM	42,260	7.0	Tuesday, December 10, 13	5:00am	77,910	7.0
Saturday, October 26, 13	5:00AM	36,850	7.0	Wednesday, December 11, 13	4:00am	60,050	7.0
Sunday, October 27, 13	7:00AM	54,350	7.0	Thursday, December 12, 13	5:00am	40,760	7.0
Monday, October 28, 13	5:00AM	39,080	7.0	Friday, December 13, 13	4:00am	133,260	7.0
Tuesday, October 29, 13	4:30AM	57,870	7.0	Saturday, December 14, 13	7:00am	69,180	7.0
Wednesday, October 30, 13	6:00AM	81,780	7.0	Sunday, December 15, 13	7:00am	141,270	7.0
Thursday, October 31, 13	4:00AM	66,140	7.0	Monday, December 16, 13	4:00am	50,060	7.0
Friday, November 1, 13	4:00AM	79,060	7.0	Tuesday, December 17, 13	5:00am	74,780	7.0
Saturday, November 2, 13	7:00am	44,780	7.0	Wednesday, December 18, 13	4:00am	101,050	7.0
Sunday, November 3, 13	8:00AM	57,110	7.0	Thursday, December 19, 13	5:00am	45,140	7.0
Monday, November 4, 13	4:00AM	129,510	7.0	Friday, December 20, 13	6:00am	50,480	7.0
Tuesday, November 5, 13	8:45AM	64,860	7.0	Saturday, December 21, 13	7:00am	61,430	7.0
Wednesday, November 6, 13	5:30AM	46,320	7.0	Sunday, December 22, 13	7:00am	31,560	7.0
Thursday, November 7, 13	12:05AM	20,370	7.0	Monday, December 23, 13	5:00am	41,260	7.0
Friday, November 8, 13	12:10AM	65,970	7.0	Tuesday, December 24, 13	1:00am	36,430	7.0
Saturday, November 9, 13	7:00AM	41,890	7.0	Wednesday, December 25, 13	6:00am	33,660	7.0
Sunday, November 10, 13	7:00AM	160,780	7.0	Thursday, December 26, 13	5:00am	140,820	7.0
Monday, November 11, 13	5:00AM	49,940	7.0	Friday, December 27, 13	5:30am	85,670	7.0
Tuesday, November 12, 13	6:00AM	70,150	7.0	Saturday, December 28, 13	7:00am	33,170	7.0
Wednesday, November 13, 13	4:00AM	93,780	7.0	Sunday, December 29, 13	6:00am	59,060	7.0
Thursday, November 14, 13	12:05AM	68,930	7.0	Monday, December 30, 13	4:30am	163,660	7.0
Friday, November 15, 13	7:00AM	96,680	7.0	Tuesday, December 31, 13	12:30am	53,440	7.0

08/05/14ds		Flow		pH		Date		Time		water usage per day (gal)		SU	
Date	Time	water usage per day (gal)	SU	Date	Time	water usage per day (gal)	SU	Date	Time	water usage per day (gal)	SU	Date	Time
Q1 2014													
Wednesday, January 1, 14	5:00am	61,460	7.0	Saturday, February 15, 14	4:00 AM			Saturday, February 15, 14	4:00 AM	130,580	7.0		
Thursday, January 2, 14	5:00am	70,680	7.0	Sunday, February 16, 14	4:00 AM			Sunday, February 16, 14	4:00 AM	19,480	7.0		
Friday, January 3, 14	6:00am	88,530	7.0	Monday, February 17, 14	6:00 AM			Monday, February 17, 14	6:00 AM	70,400	7.0		
Saturday, January 4, 14	5:00am	44,380	7.0	Tuesday, February 18, 14	4:00 AM			Tuesday, February 18, 14	4:00 AM	73,000	7.0		
Sunday, January 5, 14	7:00am	67,180	7.0	Wednesday, February 19, 14	6:00 AM			Wednesday, February 19, 14	6:00 AM	62,900	7.0		
Monday, January 6, 14	4:00am	86,130	7.0	Thursday, February 20, 14	4:00 AM			Thursday, February 20, 14	4:00 AM	66,600	7.0		
Tuesday, January 7, 14	5:00am	85,740	7.0	Friday, February 21, 14	4:00 AM			Friday, February 21, 14	4:00 AM	75,100	7.0		
Wednesday, January 8, 14	5:00am	74,820	7.0	Saturday, February 22, 14	4:00 AM			Saturday, February 22, 14	4:00 AM	69,867	7.0		
Thursday, January 9, 14	5:00am	81,780	7.0	Sunday, February 23, 14	6:00 AM			Sunday, February 23, 14	6:00 AM	69,867	7.0		
Friday, January 10, 14	5:00am	52,460	7.0	Monday, February 24, 14	5:00 AM			Monday, February 24, 14	5:00 AM	69,867	7.0		
Saturday, January 11, 14	10:00am	54,980	7.0	Tuesday, February 25, 14	7:30 AM			Tuesday, February 25, 14	7:30 AM	80,600	7.0		
Sunday, January 12, 14	11:00am	72,180	7.0	Wednesday, February 26, 14	6:00 AM			Wednesday, February 26, 14	6:00 AM	62,700	7.0		
Monday, January 13, 14	5:00am	91,340	7.0	Thursday, February 27, 14	4:00 AM			Thursday, February 27, 14	4:00 AM	111,700	7.0		
Tuesday, January 14, 14	5:00am	71,730	7.0	Friday, February 28, 14	4:00 AM			Friday, February 28, 14	4:00 AM	19,800	7.0		
Wednesday, January 15, 14	4:00am	88,980	7.0	Saturday, March 1, 14	6:00 AM			Saturday, March 1, 14	6:00 AM	91,000	7.0		
Thursday, January 16, 14	4:00am	77,110	7.0	Sunday, March 2, 14	6:00 AM			Sunday, March 2, 14	6:00 AM	13,600	7.0		
Friday, January 17, 14	4:00am	62,990	7.0	Monday, March 3, 14	4:00 AM			Monday, March 3, 14	4:00 AM	106,800	7.0		
Saturday, January 18, 14	7:00am	58,850	7.0	Tuesday, March 4, 14	5:00 AM			Tuesday, March 4, 14	5:00 AM	75,300	7.0		
Sunday, January 19, 14	6:00am	73,260	7.0	Wednesday, March 5, 14	4:00 AM			Wednesday, March 5, 14	4:00 AM	25,500	7.0		
Monday, January 20, 14	4:00am	128,030	7.0	Thursday, March 6, 14	4:00 AM			Thursday, March 6, 14	4:00 AM	59,950	7.0		
Tuesday, January 21, 14	5:00am	99,260	7.0	Friday, March 7, 14	4:00 AM			Friday, March 7, 14	4:00 AM	59,950	7.0		
Wednesday, January 22, 14	4:00am	55,040	7.0	Saturday, March 8, 14	4:00 AM			Saturday, March 8, 14	4:00 AM	63,100	7.0		
Thursday, January 23, 14	4:00am	106,670	7.0	Sunday, March 9, 14	4:00 AM			Sunday, March 9, 14	4:00 AM	63,100	7.0		
Friday, January 24, 14	4:00am	66,810	7.0	Monday, March 10, 14	4:00 AM			Monday, March 10, 14	4:00 AM	63,100	7.0		
Saturday, January 25, 14	7:00am	70,480	7.0	Tuesday, March 11, 14	5:00 AM			Tuesday, March 11, 14	5:00 AM	78,000	7.0		
Sunday, January 26, 14	7:00am	73,060	7.0	Wednesday, March 12, 14	4:00 AM			Wednesday, March 12, 14	4:00 AM	53,100	7.0		
Monday, January 27, 14	4:00am	120,420	7.0	Thursday, March 13, 14	4:00 AM			Thursday, March 13, 14	4:00 AM	61,300	7.0		
Tuesday, January 28, 14	4:00am	71,890	7.0	Friday, March 14, 14	4:00 AM			Friday, March 14, 14	4:00 AM	62,800	7.0		
Wednesday, January 29, 14	4:00am	71,150	7.0	Saturday, March 15, 14	4:00 AM			Saturday, March 15, 14	4:00 AM	64,700	7.0		
Thursday, January 30, 14	4:00am	36,590	7.0	Sunday, March 16, 14	8:00 AM			Sunday, March 16, 14	8:00 AM	64,700	7.0		
Friday, January 31, 14	4:00am	115,060	7.0	Monday, March 17, 14	4:00 AM			Monday, March 17, 14	4:00 AM	64,700	7.0		
Saturday, February 1, 14	6:00am	62,220	7.0	Tuesday, March 18, 14	5:00 AM			Tuesday, March 18, 14	5:00 AM	67,600	7.0		
Sunday, February 2, 14	7:00am	92,080	7.0	Wednesday, March 19, 14	4:00 AM			Wednesday, March 19, 14	4:00 AM	61,700	7.0		
Monday, February 3, 14	4:00am	116,630	7.0	Thursday, March 20, 14	4:00 AM			Thursday, March 20, 14	4:00 AM	55,500	7.0		
Tuesday, February 4, 14	4:30am	29,430	7.0	Friday, March 21, 14	4:00 AM			Friday, March 21, 14	4:00 AM	65,000	7.0		
Wednesday, February 5, 14	4:00 AM	70,580	7.0	Saturday, March 22, 14	4:00 AM			Saturday, March 22, 14	4:00 AM	41,000	7.0		
Thursday, February 6, 14	4:00 AM	89,810	7.0	Sunday, March 23, 14	9:00 AM			Sunday, March 23, 14	9:00 AM	115,900	7.0		
Friday, February 7, 14	4:00 AM	58,300	7.0	Monday, March 24, 14	4:00 AM			Monday, March 24, 14	4:00 AM	41,000	7.0		
Saturday, February 8, 14	4:00 AM	50,330	7.0	Tuesday, March 25, 14	5:00 AM			Tuesday, March 25, 14	5:00 AM	84,300	7.0		
Sunday, February 9, 14	4:00 AM	15,990	7.0	Wednesday, March 26, 14	4:30 AM			Wednesday, March 26, 14	4:30 AM	47,500	7.0		
Monday, February 10, 14	6:30 AM	150,990	7.0	Thursday, March 27, 14	4:00 AM			Thursday, March 27, 14	4:00 AM	67,400	7.0		
Tuesday, February 11, 14	5:00 AM	68,560	7.0	Friday, March 28, 14	6:00 AM			Friday, March 28, 14	6:00 AM	71,200	7.0		
Wednesday, February 12, 14	4:00 AM	64,900	7.0	Saturday, March 29, 14	8:00 AM			Saturday, March 29, 14	8:00 AM	68,700	7.0		
Thursday, February 13, 14	4:00 AM	72,100	7.0	Sunday, March 30, 14	8:00 AM			Sunday, March 30, 14	8:00 AM	32,100	7.0		
Friday, February 14, 14	6:00 AM	72,290	7.0	Monday, March 31, 14	7:00 AM			Monday, March 31, 14	7:00 AM	81,100	7.0		

Date		Flow		pH		Date		Time		water usage per day (gal)		SU	
Date	Time	water usage per day (gal)	SU	Date	Time	water usage per day (gal)	SU	Date	Time	water usage per day (gal)	SU	Date	Time
08/05/14													
Q2 2014													
Tuesday, April 1, 14	5:00 AM	77,700	7.4	Friday, May 16, 14	3:00 AM	67,290	7.4						
Wednesday, April 2, 14	4:00 AM	43,400	7.4	Saturday, May 17, 14	6:00 AM	111,010	7.4						
Thursday, April 3, 14	4:00 AM	62,400	7.4	Sunday, May 18, 14	6:00 AM	81,000	7.4						
Friday, April 4, 14	4:00 AM	60,580	7.4	Monday, May 19, 14	4:00 AM	44,100	7.4						
Saturday, April 5, 14	4:00 AM	89,900	7.4	Tuesday, May 20, 14	4:00 AM	93,200	7.4						
Sunday, April 6, 14	5:00 AM	48,020	7.4	Wednesday, May 21, 14	4:00 AM	93,200	7.4						
Monday, April 7, 14	4:00 AM	63,260	7.4	Thursday, May 22, 14	6:00 AM	74,900	7.4						
Tuesday, April 8, 14	5:00 AM	83,640	7.4	Friday, May 23, 14	4:00 AM	69,800	7.4						
Wednesday, April 9, 14	4:00 AM	45,980	7.4	Saturday, May 24, 14	4:00 AM	21,000	7.4						
Thursday, April 10, 14	4:00 AM	64,620	7.4	Sunday, May 25, 14	5:00 AM	118,000	7.4						
Friday, April 11, 14	4:00 AM	55,850	7.4	Monday, May 26, 14	4:00 AM	103,000	7.4						
Saturday, April 12, 14	5:00 AM	37,370	7.4	Tuesday, May 27, 14	4:30 AM	91,600	7.4						
Sunday, April 13, 14	6:00 AM	37,370	7.4	Wednesday, May 28, 14	6:00 AM	72,500	7.4						
Monday, April 14, 14	4:00 AM	98,655	7.4	Thursday, May 29, 14	4:30 AM	66,400	7.4						
Tuesday, April 15, 14	4:00 AM	98,655	7.4	Friday, May 30, 14	4:00 AM	76,100	7.4						
Wednesday, April 16, 14	4:00 AM	56,450	7.4	Saturday, May 31, 14	4:00 AM	39,000	7.4						
Thursday, April 17, 14	4:00 AM	63,375	7.4	Sunday, June 1, 14	6:30 AM	98,800	7.4						
Friday, April 18, 14	4:00 AM	63,375	7.4	Monday, June 2, 14	5:30 AM	99,900	7.4						
Saturday, April 19, 14	8:00 AM	73,150	7.4	Tuesday, June 3, 14	5:00 AM	88,900	7.4						
Sunday, April 20, 14	9:00 AM	73,150	7.4	Wednesday, June 4, 14	4:30 AM	60,300	7.4						
Monday, April 21, 14	4:00 AM	19,800	7.4	Thursday, June 5, 14	4:00 AM	72,800	7.4						
Tuesday, April 22, 14	5:00 AM	19,800	7.4	Friday, June 6, 14	4:30 AM	74,100	7.4						
Wednesday, April 23, 14	5:30 AM	55,500	7.4	Saturday, June 7, 14	5:00 AM	97,900	7.4						
Thursday, April 24, 14	5:30 AM	67,350	7.4	Sunday, June 8, 14	6:30 AM	55,550	7.4						
Friday, April 25, 14	4:00 AM	55,810	7.4	Monday, June 9, 14	4:00 AM	55,550	7.4						
Saturday, April 26, 14	6:00 AM	97,000	7.4	Tuesday, June 10, 14	6:00 AM	88,600	7.4						
Sunday, April 27, 14	6:30 AM	41,370	7.4	Wednesday, June 11, 14	2:00 AM	51,100	7.4						
Monday, April 28, 14	5:30 AM	41,370	7.4	Thursday, June 12, 14	2:00 AM	47,600	7.4						
Tuesday, April 29, 14	5:00 AM	65,200	7.4	Friday, June 13, 14	2:00 AM	72,000	7.4						
Wednesday, April 30, 14	5:00 AM	56,310	7.4	Saturday, June 14, 14	6:00 AM	50,600	7.4						
Thursday, May 1, 14	6:00 AM	64,620	7.4	Sunday, June 15, 14	6:00 AM	56,600	7.4						
Friday, May 2, 14	5:00 AM	56,340	7.4	Monday, June 16, 14	4:00 AM	112,200	7.4						
Saturday, May 3, 14	6:00 AM	108,790	7.4	Tuesday, June 17, 14	2:30 AM	69,600	7.4						
Sunday, May 4, 14	3:00 AM	121,090	7.4	Wednesday, June 18, 14	5:00 AM	105,300	7.4						
Monday, May 5, 14	6:00 AM	17,800	7.4	Thursday, June 19, 14	12:00 AM	46,400	7.4						
Tuesday, May 6, 14	5:00 AM	17,800	7.4	Friday, June 20, 14	6:00 AM	101,300	7.4						
Wednesday, May 7, 14	4:00 AM	17,800	7.4	Saturday, June 21, 14	2:00 AM	69,400	7.4						
Thursday, May 8, 14	4:00 AM	55,170	7.4	Sunday, June 22, 14	4:00 AM	84,250	7.4						
Friday, May 9, 14	4:00 AM	80,680	7.4	Monday, June 23, 14	4:00 AM	84,250	7.4						
Saturday, May 10, 14	6:00 AM	118,200	7.4	Tuesday, June 24, 14	4:00 AM	92,900	7.4						
Sunday, May 11, 14	6:00 AM	118,200	7.4	Wednesday, June 25, 14	4:00 AM	81,900	7.4						
Monday, May 12, 14	6:00 AM	15,200	7.4	Thursday, June 26, 14	4:00 AM	78,400	7.4						
Tuesday, May 13, 14	4:00 AM	84,600	7.4	Friday, June 27, 14	2:00 AM	70,800	7.4						
Wednesday, May 14, 14	2:30 AM	77,900	7.4	Saturday, June 28, 14	4:30 AM	85,200	7.4						
Thursday, May 15, 14	4:30 AM	86,200	7.4	Monday, June 30, 14	6:00 AM	85,200	7.4						

# **ATTACHMENT 5**

## BILL ANALYSIS

SENATE RULES COMMITTEE	SB 1284
Office of Senate Floor Analyses	
1020 N Street, Suite 524	
(916) 651-1520	Fax: (916)
327-4478	

## UNFINISHED BUSINESS

Bill No: SB 1284  
 Author: Ducheny (D)  
 Amended: 8/20/10  
 Vote: 21

SENATE ENV. QUALITY COMMITTEE : 7-0, 4/19/10  
 AYES: Simitian, Runner, Corbett, Hancock, Lowenthal,  
 Pavley, Strickland

SENATE APPROPRIATIONS COMMITTEE : 10-0, 5/27/10  
 AYES: Kehoe, Alquist, Corbett, Denham, Leno, Price,  
 Walters, Wolk, Wyland, Yee  
 NO VOTE RECORDED: Cox

SENATE FLOOR : 31-0, 06/03/10  
 AYES: Alquist, Ashburn, Calderon, Cedillo, Corbett, Correa,  
 Denham, Ducheny, Dutton, Florez, Hancock, Huff, Kehoe,  
 Leno, Liu, Lowenthal, Negrete McLeod, Oropeza, Padilla,  
 Pavley, Price, Romero, Runner, Simitian, Steinberg,  
 Strickland, Walters, Wolk, Wright, Wyland, Yee  
 NO VOTE RECORDED: Aanstad, Cogdill, Cox, DeSaulnier,  
 Harman, Hollingsworth, Wiggins, Vacancy, Vacancy

ASSEMBLY FLOOR : 77-0, 8/25/10 - See last page for vote

SUBJECT : Water quality: mandatory minimum civil  
 penalties

SOURCE : Association of California Water Agencies  
 Regional Council for Rural Counties

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SB 1284  
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DIGEST : This bill exempts certain Water Code violations  
 of waste discharge reporting requirements from existing  
 mandatory minimum penalties. This Bill also extends the  
 time limit under which dischargers must come into  
 compliance with a permit requirement from five years to 10  
 years.

Assembly Amendments change the sunset date from January 1,  
 2016 to January 2014 and make minor technical changes.

ANALYSIS :

Existing law, under the Porter-Cologne Water Quality  
 Control Act:

1. Provides that any person who violates prescribed  
 provisions of the Clean Water Act or the Porter-Cologne  
 Water Quality Control Act is subject to civil liability,  
 and sets requirements for determining the amount of any  
 liability.
2. Requires a mandatory minimum penalty (MMP) of \$3,000 to  
 be assessed for each serious violation, under certain  
 circumstances.
3. Authorizes the State Water Resources Control Board

(SWRCB) or a regional water quality control board (RWQCB), in lieu of assessing all or a portion of the MMP, to require a publicly-owned treatment works (POTW) serving a small community to spend an equivalent amount towards the completion of a compliance project proposed by the POTW if the POTW or SWRCB makes certain findings (e.g., compliance project is designed to correct the violations within five years, compliance project is consistent with SWRCB enforcement policy, POTW has prepared a financing plan to complete the compliance project).

4. Provides that for purposes of #3, a "POTW serving a small community" serves a population of 10,000 or fewer or a rural county, with a financial hardship as determined by the SWRCB after considering such factors as median income of the residents, rate of unemployment,

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or low population density.

5. Provides an exception to the imposition of MMPs for a violation of an effluent limitation if the waste discharge complies with a certain time schedule order and other requirements are met. For the purposes of the exception, a time schedule cannot exceed five years, except under certain conditions.

Mandatory minimum penalties . MMPs were established in 1999 in response to concerns over the SWRCB and RWQCB failing to take enforcement actions against Water Code violations. According to the SWRCB, the California Water Code Section 13385(h) requires an MMP of \$3,000 for each "serious" violation.

The Water Boards are also required by California Water Code 13385(i) to assess MMPs of \$3,000 for multiple chronic violations. This penalty applies when the discharger does any of the following four or more times in any period of six-consecutive months: (1) Violates effluent limitations, (2) Fails to file a report of waste discharge or file an incomplete report, or (3) Violates a toxicity effluent limitation where the waste discharge requirement does not contain pollutant-specific effluent limitations for toxic pollutants.

This bill

1. Revises current law to allow a regional board, after a public hearing, to extend the time schedule for bringing a waste discharge into compliance for an additional five years, to a possible total time schedule of ten years if the discharger can demonstrate that additional time is necessary in order to reach compliance with effluent limitations.
2. Provides that the failure to file a discharge monitoring report for a reporting period in which no discharges occur does not constitute a "serious violation" that gives rise to mandatory minimum penalties if the discharger submits a written statement to the appropriate regional board under penalty of perjury

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stating that in fact no discharges occurred and stating the reasons for the failure to file. This bill states that regardless of whether mandatory minimum penalties apply to the failure to file a discharge monitoring report for a reporting period in which no discharges occur, the failure to file such a report may be subject to discretionary penalties.

3. Provides, on a one-time basis only, that where a discharger has not previously received notification from the state or regional board of an enforcement action imposing mandatory minimum penalties and where the current violation consists of failures to file discharge monitoring reports for reporting periods where dischargers did not violate numeric effluent limitations, that discharger will be subject to a total fine of \$3,000 per required report. After this one-time fine, a discharger who subsequently fails to file such a report will be fined in accordance to current law. The bill states that regardless of whether the failure to file such reports is subject to the one-time relief provided, the failure to file the required report(s) may be subject to discretionary penalties.
4. Provides that the amendments made to that section applies to violations for which an administrative civil liability complaint or a judicial complaint has not been filed before July 1, 2010 without regard to the date on which the violations occurred..
5. Sunsets January 1, 2014. \_

FISCAL EFFECT : Appropriation: No Fiscal Com.: Yes  
Local: No

According to the Senate Appropriations Committee analysis, because the bill exempts some violations from mandatory minimum penalties, the bill is likely to reduce future penalty revenues. The amount of any potential penalty revenue loss is unknown.

SUPPORT : (Verified 8/25/10)

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Association of California Water Agencies (co-source) \_  
Regional Council of Rural Counties (co-source)  
California Association of Sanitation Agencies  
California Chamber of Commerce  
California Special Districts Association  
California State Association of Counties  
California Water Association  
City of Camarillo  
Crescenta Valley Water District  
El Dorado Irrigation District  
Inland Empire Utilities Agency  
Lake Berryessa Resort Improvement District  
League of Cities  
Napa Berryessa Resort Improvement District  
Napa County  
Pico Water District

ARGUMENTS IN SUPPORT : According to the sponsor, MMPs are a deterrent and a punishment for willful violators, and should remain in place for that intended purpose. However, the sponsors feel that the way the statute is currently drafted; the definition of a "serious violation" warranting the imposition of an MMP is far too broad and exposes public agencies who simply failed to file a report indicating no discharges to the vast penalties. The sponsor asserts that this bill provides that certain violations involving the failure to file a discharge monitoring report for no discharges or discharges that do not reach regulated level are not subject to those MMPs.

According to the Association of California Water Agencies (ACWA), there are several public agency members with permits requiring reporting which believe that they have received excessive, disproportionate fines for a simple failure to file the report. ACWA sites an example of one small water agency fine that is in excess of \$600,000.

ASSEMBLY FLOOR :

AYES: Adams, Ammiano, Anderson, Arambula, Bass, Beall, Bill Berryhill, Tom Berryhill, Block, Blumenfeld, Bradford, Brownley, Buchanan, Caballero, Charles Calderon, Carter, Chesbro, Conway, Cook, Coto, Davis, De La Torre, De Leon, DeVore, Eng, Evans, Feuer, Fletcher, Fong, Fuller, Furutani, Gaines, Galgiani, Garrick, Gatto, Gilmore,

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Hagman, Hall, Harkey, Hayashi, Hernandez, Hill, Huber,  
Huffman, Jeffries, Jones, Knight, Lieu, Logue, Bonnie  
Lowenthal, Ma, Mendoza, Miller, Monning, Nava, Nestande,  
Niello, Nielsen, Norby, V. Manuel Perez, Portantino,  
Ruskin, Salas, Saldana, Silva, Skinner, Smyth, Solorio,  
Audra Strickland, Swanson, Torlakson, Torres, Torrico,  
Tran, Villines, Yamada, John A. Perez  
NO VOTE RECORDED: Fuentes, Vacancy, Vacancy

TSM:dc 8/26/10 Senate Floor Analyses

SUPPORT/OPPOSITION: SEE ABOVE

\*\*\*\* END \*\*\*\*

CONTINUED

# **ATTACHMENT 6**

## Dan Sholl

---

**From:** Asay, Deirdre@Waterboards [Deirdre.Asay@waterboards.ca.gov]  
**Sent:** Wednesday, June 04, 2014 4:44 PM  
**To:** Dan Sholl  
**Cc:** Orellana, Lucio@Waterboards  
**Subject:** Self-Monitoring Reports, California Sprouts, LLC

Afternoon Mr. Sholl,

You are enrolled in Waste Discharge Requirements Order(WDRs) R5-2013-0073-012 Limited Threat General Order, (NPDES No. CAG995002) for the California Sprouts, Sacramento County. Based on a review of our records, we have not received the following documents:

- ~~✗~~ The 2012 Quarter 3 (3Q12) monitoring report, due November 1, 2012, not received as of 4 June 2014.
- ~~✗~~ The 2012 Quarter 4 (4Q12) monitoring report, due February 1, 2013, not received as of 4 June 2014.
- ~~✗~~ The 2013 Quarter 1 (1Q13) monitoring report, due May 1, 2013, not received as of 4 June 2014.
- ~~✗~~ The 2013 Quarter 2 (2Q13) monitoring report, due August 1, 2013, not received as of 4 June 2014.
- ✗ The 2013 Quarter 3 (3Q13) monitoring report, due November 1, 2013, not received as of June 4, 2014.
- ✗ The 2013 Quarter 4 (4Q13) monitoring report, due February 1, 2014, not received as of June 4, 2014.
- ✗ The 2014 Quarter 1 (1Q14) monitoring report, due May 1, 2014, not received as of June 4, 2014.

We request that you respond to this notice and submit the documents.

If no discharge occurred during a quarterly reporting period, you must send a letter stating so.

If you have any questions, please contact Lucio Orellana at (916) 464-4660 or [lorellana@waterboards.ca.gov](mailto:lorellana@waterboards.ca.gov).

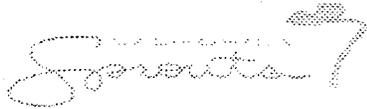
*Thank you,*

*Deirdre (De) M. Asay*

Scientific Aid  
NPDES Compliance and Enforcement Unit  
California Regional Water Quality Control Board, Central Valley Region  
11020 Sun Center Drive, #200  
Rancho Cordova, CA 95670  
[Deirdre.Asay@waterboards.ca.gov](mailto:Deirdre.Asay@waterboards.ca.gov)  
Phone: (916) 464-4827  
Fax: (916) 464-4681

ATTACHMENT 6

# **ATTACHMENT 7**



June 6, 2014

Lucio Orellana  
Compliance and Enforcement Section  
Central Valley Regional Water Quality Control Board  
11020 Sun Center Drive, Suite 200  
Rancho Cordova, CA 95670-6114

SUBJECT: eSMR<sup>2</sup> QUARTERLY SELF-MONITORING REPORT SUBMITTAL FOR  
July – September 2012 FOR , Pacific Coast Sprout Farms Sacramento Facility,  
Sacramento County, ORDER R5-2013-0073-027, NPDES No. CA CAG995002

This letter documents the electronic transmittal of the Q3 2012 monitoring report.

Chose one:

There were 2 violations of missed tests during the reporting period.

The following documents are found as attachments to the electronic submittal:

- NPDES Q3\_Reporting Results
- NPDES September 2012 Lab Results 092412

*I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designated to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.*

Sincerely,

Daniel Sholl  
General Manager 

Note: Per Standard Provisions, Reporting sections V.B.2 and V.B.3, the LRO must be a principal executive officer or ranking elected official of the Discharger's agency, or a duly authorized representative that meets the intent of 40 CFR 122.22(b)(2).

ATTACHMENT 7

Parameter	Concentration	Date Sampled	Effluent Limit	Lab Reporting Limit
Location	EFF-001			
Sampling Date	3Q 2012			
Flow	59,407 gallons/day	Average over sample period	-----	
Electrical Conductivity (EC) at 25 ° C	missed sample	7/1/2012	700 µmhos/cm	1.00 µmhos/cm
Electrical Conductivity (EC) at 25 ° C	missed sample	8/1/2012	700 µmhos/cm	1.00 µmhos/cm
Electrical Conductivity (EC) at 25 ° C	850 µmhos/cm	9/24/2012	700 µmhos/cm	1.00 µmhos/cm
pH	7.00 SU		>6.5 and <8.5	
Average Water Temp	69.0 ° F		-----	



# IEH - JL ANALYTICAL

217 Primo Way • Modesto, California 95358 • Office (209) 539-0111 • FAX (209) 538-3866

California Sprouts-Warehouse Way

5640 Warehouse Way  
Sacramento, CA 95826

Report # **L2.2-14R20019**  
Report Date: **09/27/2012**  
Received Date: **09/24/2012**  
Work Order: **276026**

Laboratory Number: 27602601  
Description: Water, Test For Permit, 9-22-12, 600

## Analytical Results

Constituent	Result	Minimum Level	Method Detection Limit	Method Reference	Analysis Date	Analysis Time	Analyst
Electrical Conductivity (E.C.)	850 umho/cm	1.0	1.0	SM 2510B <sup>5</sup>	09/26/2012	16:20	JA

## QC Results

Constituent	QC Units	Blank	Matrix	Theoretical Spike	Matrix Spike	Matrix Spike Duplicate	Lab Control Spike	Precision %	Accuracy %	Response %
Electrical Conductivity (E.C.)	umho/cm	< 1	760	1400	2100	2100	1400	0.0	94.4	99.9

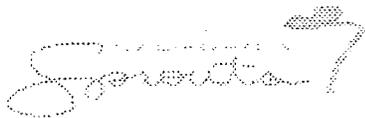
### Notes

At 25 °C

Authorized By: *Amos Snider*

09/27/2012

Amos Snider Laboratory Supervisor



June 6, 2014

Lucio Orellana  
Compliance and Enforcement Section  
Central Valley Regional Water Quality Control Board  
11020 Sun Center Drive, Suite 200  
Rancho Cordova, CA 95670-6114

SUBJECT: eSMR<sup>2</sup> QUARTERLY SELF-MONITORING REPORT SUBMITTAL FOR  
October - December 2012 FOR, California Sprouts, Sacramento Facility,  
Sacramento County, ORDER R5-2013-0073-0~~12~~<sup>27</sup>, NPDES No. CA CAG995002

This letter documents the written submission of the Q4 monitoring report.

Chose one:

There was 1 violation of a missed tests per the requirements during the reporting period.

The following documents are found as attachments with this written submittal:

- NPDES Q4 2012 Reporting sheet
- NPDES Q4 2012 Lab Results 10/22/12
- NPDES Q4 2012 Lab Results 12/05/12

*I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designated to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.*

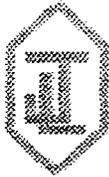
Sincerely,

Daniel Sholl  
General Manager



Note: Per Standard Provisions, Reporting sections V.B.2 and V.B.3, the LRO must be a principal executive officer or ranking elected official of the Discharger's agency, or a duly authorized representative that meets the intent of 40 CFR 122.22(b)(2).

Parameter	Concentration	Date Sampled	Effluent Limit	Lab Reporting Limit
Location	EFF-001		Monthly Average	
Sampling Date	4Q 2012			
Flow	43,036 gallons/day	Average over sample period		
Electrical Conductivity (EC) at 25° C	1,800 µmhos/cm	10/22/2012	700 µmhos/cm	1.00 µmhos/cm
Electrical Conductivity (EC) at 25° C	Missed sample	11/17/2012	700 µmhos/cm	1.00 µmhos/cm
Electrical Conductivity (EC) at 25° C	530 µmhos/cm	12/5/2012	700 µmhos/cm	1.00 µmhos/cm
pH	7.00 SU		>6.5 and <8.5	
Average Water Temp	69.0 °F			



# IEH - JL ANALYTICAL

317 Primo Way • Modesto, California 95259 • Office (209) 536-9111 • FAX (209) 538-2968

California Sprouts - Warehouse Way

5640 Warehouse Way  
Sacramento, CA 95826

Report # L2.2-14R20484  
Report Date: 10/26/2012  
Received Date: 10/22/2012  
Work Order: 279613

Laboratory Number: 27961301  
Description: Waste Water, Test of Permit, 10/22/12, 600

## Analytical Results

Constituent	Result	Minimum Level	Method Detection Limit	Method Reference	Analysis Date	Analysis Time	Analyst
Electrical Conductivity (E.C.)	1800 umho/cm	1.0	1.0	SM 2510B <sup>5</sup>	10/25/2012	15:10	JA

## QC Results

Constituent	QC Units	Blank	Matrix	Theoretical Spike	Matrix Spike	Matrix Spike Duplicate	Lab Control Spike	Precision %	Accuracy %	Response %
Electrical Conductivity (E.C.)	umho/cm	< 1	310	1400	1700	1700	1400	0.4	96.5	100.4

*Handwritten notes:* Wt 10/26/12 6AM

### Notes

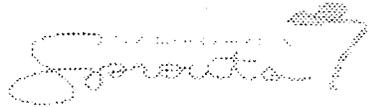
At 25 °C

Authorized By: *Amos Snider*

10/26/2012

Amos Snider Laboratory Supervisor

ELAP Accreditation Laboratory Certificate #2776. These results relate only to the samples tested. This report shall not be reproduced except in full, without written approval of the laboratory.



June 6, 2014

Lucio Orellana  
Compliance and Enforcement Section  
Central Valley Regional Water Quality Control Board  
11020 Sun Center Drive, Suite 200  
Rancho Cordova, CA 95670-6114

SUBJECT: eSMR<sup>2</sup> QUARTERLY SELF-MONITORING REPORT SUBMITTAL FOR  
January – March 2013 FOR, California Sprouts, Sacramento Facility, Sacramento  
County, ORDER R5-2013-0073-0~~2~~, NPDES No. CA CAG995002

27

This letter documents the written submission of the Q1 monitoring report.

Chose one:

There were no violations per the requirements during the reporting period.

The following documents are found as attachments with this written submittal:

- NPDES Q1 2013 Reporting sheet
- NPDES Q1 2013 Lab Results 01/05/13
- NPDES Q1 2013 Lab Results 02/23/13
- NPDES Q1 2013 Lab Results 03/14/13

*I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designated to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.*

Sincerely,

Daniel Sholi  
General Manager 

Note: Per Standard Provisions, Reporting sections V.B.2 and V.B.3, the LRO must be a principal executive officer or ranking elected official of the Discharger's agency, or a duly authorized representative that meets the intent of 40 CFR 122.22(b)(2).

Parameter	Concentration	Date Sampled	Effluent Limit	Lab Reporting Limit
Location	EFF-001		Monthly Average	
Sampling Date	1Q 2013			
Flow	40.763 gallons/day	Average over sample period		
Electrical Conductivity (EC) at 25° C	430 µmhos/cm	1/5/2013	700 µmhos/cm	1.00 µmhos/cm
Electrical Conductivity (EC) at 25° C	430 µmhos/cm	2/23/2013	700 µmhos/cm	1.00 µmhos/cm
Electrical Conductivity (EC) at 25° C	460 µmhos/cm	3/14/2013	700 µmhos/cm	1.00 µmhos/cm
pH	7.00 SU			
Average Water Temp	69.0 °F		>6.5 and <8.5	



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California Sprouts-Warehouse Way

5640 Warehouse Way  
Sacramento, CA 95826

Report # L2.2-14R21577  
Report Date: 01/11/2013  
Received Date: 01/08/2013  
Work Order: 284929

Laboratory Number: 28492901  
Description: Water, Test Of Permit, 1-5-13, 500

## Analytical Results

Constituent	Result	Minimum Level	Method Detection Limit	Method Reference	Analysis Date	Analysis Time	Analyst
Electrical Conductivity (E.C.)	430 umho/cm	1.0	1.0	SM 2510B <sup>5</sup>	01/10/2013	16:35	JA

## QC Results

Constituent	QC Units	Blank	Matrix	Theoretical Spike	Matrix Spike	Matrix Spike Duplicate	Lab Control Spike	Precision %	Accuracy %	Response %
Electrical Conductivity (E.C.)	umho/cm	< 1	350	1400	1700	1700	1400	0.1	95.5	100.5

### Notes

At 25 °C

Authorized By: *Amos Snider*

01/11/2013

Amos Snider Laboratory Supervisor



# IEH - JL ANALYTICAL

217 Pismo Way • Modesto, California 95356 • Office (209) 536-8111 • FAX (209) 536-2966

California Sprouts-Warehouse Way

5640 Warehouse Way  
Sacramento, CA 95826

Report # L2.2-14R22188  
Report Date: 02/26/2013  
Received Date: 02/25/2013  
Work Order: 288231

Laboratory Number: 28823101  
Description: Water, Test For Permit, 2-23-13, 600

## Analytical Results

Constituent	Result	Minimum Level	Method Detection Limit	Method Reference	Analysis Date	Analysis Time	Analyst
Electrical Conductivity (E.C.)	430 umho/cm	1.0	1.0	SM 2510B <sup>5</sup>	02/25/2013	14:30	JA

## QC Results

Constituent	QC Units	Blank	Matrix	Theoretical Spike	Matrix Spike	Matrix Spike Duplicate	Lab Control Spike	Precision %	Accuracy %	Response %
Electrical Conductivity (E.C.)	umho/cm	< 1	430	1400	1700	1700	1400	0.2	94.3	100.4

*Handwritten signature and date: 2/27/13*

### Notes

At 25 °C

Authorized By: *Amos Snider*

02/26/2013

Amos Snider Laboratory Supervisor



# IEH - JL ANALYTICAL

217 Prairie Way • Modesto, California 95358 • Office (209) 538-8111 • FAX (209) 538-3368

California Sprouts-Warehouse Way

5640 Warehouse Way  
Sacramento, CA 95826

Report # L2.2-14R22470  
Report Date: 03/18/2013  
Received Date: 03/14/2013  
Work Order: 289497

Laboratory Number: 28949701  
Description: Waste Water, Test For Permit, 3-14-13, 700

## Analytical Results

Constituent	Result	Minimum Level	Method Detection Limit	Method Reference	Analysis Date	Analysis Time	Analyst
Electrical Conductivity (E.C.)	460 umho/cm	1.0	1.0	SM 2510B <sup>5</sup>	03/15/2013	16:35	JA

## QC Results

Constituent	QC Units	Blank	Matrix	Theoretical Spike	Matrix Spike	Matrix Spike Duplicate	Lab Control Spike	Precision %	Accuracy %	Response %
Electrical Conductivity (E.C.)	umho/cm	< 1	460	1400	1800	1800	1400	0.4	96.3	100.0

### Notes

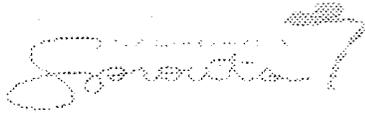
At 25 °C

Authorized By: *Amos Snider*

03/18/2013

Amos Snider Laboratory Supervisor

ELAP Accreditation Laboratory Certificate #2776. These results relate only to the samples tested. This report shall not be reproduced except in full, without written approval of the laboratory.



June 6, 2014

Lucio Orellana  
Compliance and Enforcement Section  
Central Valley Regional Water Quality Control Board  
11020 Sun Center Drive, Suite 200  
Rancho Cordova, CA 95670-6114

SUBJECT: eSMR<sup>2</sup> QUARTERLY SELF-MONITORING REPORT SUBMITTAL FOR  
April - June 2013 FOR, California Sprouts, Sacramento Facility, Sacramento  
County, ORDER R5-2013-0073-002, NPDES No. CA CAG995002

37

This letter documents the written submission of the Q2 monitoring report.

Chose one:

There were no violations per the requirements during the reporting period.

The following documents are found as attachments with this written submittal:

- NPDES Q2 2013 Reporting sheet
- NPDES Q2 2013 Lab Results 04/16/13
- NPDES Q2 2013 Lab Results 06/01/13
- NPDES Q2 2013 Lab Results 06/17/13

*I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designated to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.*

Sincerely,

Daniel Sholl  
General Manager 

Note: Per Standard Provisions, Reporting sections V.B.2 and V.B.3, the LRO must be a principal executive officer or ranking elected official of the Discharger's agency, or a duly authorized representative that meets the intent of 40 CFR 122.22(b)(2).

Parameter	Concentration	Date Sampled	Effluent Limit Monthly Average	Lab Reporting Limit
Location	EFF-001			
Sampling Date	2Q, 2013			
Flow	57,931 gallons/day	Average over sample period		
Electrical Conductivity (EC) at 25° C	2,300 µmhos/cm	4/20/2013	700 µmhos/cm	1.00 µmhos/cm
Electrical Conductivity (EC) at 25° C	450 µmhos/cm	6/17/2013	700 µmhos/cm	1.00 µmhos/cm
Electrical Conductivity (EC) at 25° C	470 µmhos/cm	6/17/2013	700 µmhos/cm	1.00 µmhos/cm
pH	7.00 SU		>6.5 and <8.5	
Average Water Temp	69.0 °F			



# IEH - JL ANALYTICAL

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California Sprouts-Warehouse Way

5640 Warehouse Way  
Sacramento, CA 95826

Report # L2.2-14R23009  
Report Date: 04/26/2013  
Received Date: 04/20/2013  
Work Order: 292049

Laboratory Number: 29204901  
Description: Water, Test of Permit, 4/16/13

## Analytical Results

Constituent	Result	Minimum Level	Method Detection Limit	Method Reference	Analysis Date	Analysis Time	Analyst
Electrical Conductivity (E.C.)	2300 umho/cm	1.0	1.0	SM 2510B <sup>5</sup>	04/26/2013	13:30	JA

## QC Results

Constituent	QC Units	Blank	Matrix	Theoretical Spike	Matrix Spike	Matrix Spike Duplicate	Lab Control Spike	Precision %	Accuracy %	Response %
Electrical Conductivity (E.C.)	umho/cm	< 1	930	1400	2200	2200	1400	0.5	92.4	100.3

### Notes

At 25 °C

*Shaker Ramsey*  
*4/29/13*

Authorized By: *Amos Snider*

04/26/2013

Amos Snider Laboratory Supervisor

ELAP Accreditation Laboratory Certificate #2776. These results relate only to the samples tested. This report shall not be reproduced except in full, without written approval of the laboratory.



# IEH - JL ANALYTICAL

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California Sprouts-Warehouse Way

5640 Warehouse Way  
Sacramento, CA 95826

Report # L2.2-14R23562  
Report Date: 06/07/2013  
Received Date: 06/03/2013  
Work Order: 295476

Laboratory Number: 29547601  
Description: Waste Water, Permit Test, 6-1-13, 500

## Analytical Results

Constituent	Result	Minimum Level	Method Detection Limit	Method Reference	Analysis Date	Analysis Time	Analyst
Electrical Conductivity (E.C.)	450 umho/cm	1.0	1.0	SM 2510B <sup>5</sup>	06/07/2013	12:45	JA

## QC Results

Constituent	QC Units	Blank	Matrix	Theoretical Spike	Matrix Spike	Matrix Spike Duplicate	Lab Control Spike	Precision %	Accuracy %	Response %
Electrical Conductivity (E.C.)	umho/cm	< 1	450	1400	1800	1800	1400	0.5	94.4	99.9

### Notes

At 25 °C

Authorized By: *Amos Snider*

06/07/2013

Amos Snider Laboratory Supervisor



# IEH - JL ANALYTICAL

217 Primo Way • Modesto, California 95358 • Office (209) 538-8111 • FAX (209) 538-3968

California Sprouts-Warehouse Way

5640 Warehouse Way  
Sacramento, CA 95826

Report # L2.2-14R23738  
Report Date: 06/24/2013  
Received Date: 06/17/2013  
Work Order: 296771

Laboratory Number: 29677101  
Description: Waste Water, Test For Permit, 6-17-13, 530

## Analytical Results

Constituent	Result	Minimum Level	Method Detection Limit	Method Reference	Analysis Date	Analysis Time	Analyst
Electrical Conductivity (E.C.)	470 umho/cm	1.0	1.0	SM 2510B <sup>5</sup>	06/21/2013	12:25	JA

## QC Results

Constituent	QC Units	Blank	Matrix	Theoretical Spike	Matrix Spike	Matrix Spike Duplicate	Lab Control Spike	Precision %	Accuracy %	Response %
Electrical Conductivity (E.C.)	umho/cm	< 1	470	1400	1700	1800	1400	0.5	93.1	100.4

*ONT  
Print out  
blank 3:30 PM*

### Notes

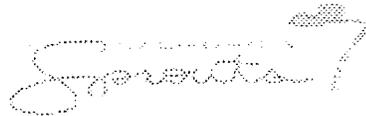
At 25 °C

Authorized By: Amos Snider

06/24/2013

Amos Snider Laboratory Supervisor

ELAP Accreditation Laboratory Certificate #2776. These results relate only to the samples tested. This report shall not be reproduced except in full, without written approval of the laboratory.



June 6, 2014

Lucio Orellana  
Compliance and Enforcement Section  
Central Valley Regional Water Quality Control Board  
11020 Sun Center Drive, Suite 200  
Rancho Cordova, CA 95670-6114

SUBJECT: eSMR<sup>2</sup> QUARTERLY SELF-MONITORING REPORT SUBMITTAL FOR  
July - September 2013 FOR, California Sprouts, Sacramento Facility, Sacramento  
County, ORDER R5-2013-0073-012, NPDES No. CA CAG995002

27

This letter documents the written submission of the Q3 monitoring report.

Chose one:

There were no violations per the requirements during the reporting period.

The following documents are found as attachments with this written submittal:

- NPDES Q3 2013 Reporting sheet
- NPDES Q3 2013 Lab Results 07/17/13
- NPDES Q3 2013 Lab Results 08/13/13
- NPDES Q3 2013 Lab Results 09/14/13

*I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.*

Sincerely,

Daniel Sholl  
General Manager 

Note: Per Standard Provisions, Reporting sections V.B.2 and V.B.3, the LRO must be a principal executive officer or ranking elected official of the Discharger's agency, or a duly authorized representative that meets the intent of 40 CFR 122.22(b)(2).

Parameter Location	Concentration	Date Sampled	Effluent Limit	Lab Reporting Limit
Sampling Date	EFF-001 3Q, 2013		Monthly Average	
Flow	59,407 gallons/day	Average over sample period		
Electrical Conductivity (EC) at 25° C	460 µmhos/cm	7/17/2013	700 µmhos/cm	1.00 µmhos/cm
Electrical Conductivity (EC) at 25° C	460 µmhos/cm	8/13/2013	700 µmhos/cm	1.00 µmhos/cm
Electrical Conductivity (EC) at 25° C	590 µmhos/cm	9/14/2013	700 µmhos/cm	1.00 µmhos/cm
pH	7.00 SU		>6.5 and <8.5	
Average Water Temp	69.0 °F			



# IEH - JL ANALYTICAL

217 Primo Way • Modesto, California 95358 • Office (209) 538-8111 • FAX (209) 538-3866

California Sprouts-Warehouse Way

5548 Warehouse Way  
Sacramento, CA 95826

Report # L2.2-14R24133  
Report Date: 07/22/2013  
Received Date: 07/17/2013  
Work Order: 299361

Laboratory Number: 29936101  
Description: Waste Water, Test For Permit, 7-17-13, 620

## Analytical Results

Constituent	Result	Minimum Level	Method Detection Limit	Method Reference	Analysis Date	Analysis Time	Analyst
Electrical Conductivity (E.C.)	460 umho/cm	1.0	1.0	SM 2510B <sup>5</sup>	07/19/2013	16:25	JA

## QC Results

Constituent	QC Units	Blank	Matrix	Theoretical Spike	Matrix Spike	Matrix Spike Duplicate	Lab Control Spike	Precision %	Accuracy %	Response %
Electrical Conductivity (E.C.)	umho/cm	< 1	460	1400	1800	1700	1400	0.8	93.3	100.1

### Notes

At 25 °C

Authorized By: *Amos Snider*

07/22/2013

Amos Snider Laboratory Supervisor

ELAP Accreditation Laboratory Certificate #2776. These results relate only to the samples tested. This report shall not be reproduced except in full, without written approval of the laboratory.



# IEH - JL ANALYTICAL

217 Fresno Way • Modesto, California 95358 • Office (209) 538-2111 • FAX (209) 538-2968

California Sprouts-Warehouse Way

5640 Warehouse Way  
Sacramento, CA 95826

Report # L2.2-14R24538  
Report Date: 08/19/2013  
Received Date: 08/13/2013  
Work Order: 301657

Laboratory Number: 30165701  
Description: Waste Water, Permit, 8-13-13, 600

## Analytical Results

Constituent	Result	Minimum Level	Method Detection Limit	Method Reference	Analysis Date	Analysis Time	Analyst
Electrical Conductivity (E.C.)	460 umho/cm	1.0	1.0	SM 2510B <sup>5</sup>	08/19/2013	09:37	JA

## QC Results

Constituent	QC Units	Blank	Matrix	Theoretical Spike	Matrix Spike	Matrix Spike Duplicate	Lab Control Spike	Precision %	Accuracy %	Response %
Electrical Conductivity (E.C.)	umho/cm	< 1	460	1400	1800	1800	1400	0.7	95.3	100.5

OK Print out  
8/20/13  
CJ

### Notes

At 25 °C

Authorized By: *Amos Snider*

08/19/2013

Amos Snider Laboratory Supervisor



# IEH - JL ANALYTICAL

217 Fresno Way • Modesto, California 95208 • Office (209) 538-8111 • FAX (209) 538-0866

California Sprouts-Warehouse Way

5640 Warehouse Way  
Sacramento, CA 95826

Report # L2.2-14R25032  
Report Date: 09/19/2013  
Received Date: 09/16/2013  
Work Order: 304675

Laboratory Number: 30467501  
Description: Waste Water, Test Permit, 9-14-13, 630

## Analytical Results

Constituent	Result	Minimum Level	Method Detection Limit	Method Reference	Analysis Date	Analysis Time	Analyst
Electrical Conductivity (E.C.)	590 umho/cm	1.0	1.0	SM 2510B <sup>5</sup>	09/18/2013	15:30	JA

## QC Results

Constituent	QC Units	Blank	Matrix	Theoretical Spike	Matrix Spike	Matrix Spike Duplicate	Lab Control Spike	Precision %	Accuracy %	Response %
Electrical Conductivity (E.C.)	umho/cm	< 1	590	1400	1800	1900	1400	0.8	92.5	99.9

*OK R 9/20/13 AM 4:30*  
*[Signature]*

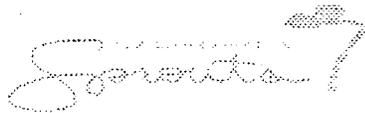
### Notes

At 25 °C

Authorized By: *Amos Snider*

09/19/2013

Amos Snider Laboratory Supervisor



June 6, 2014

Lucio Orellana  
Compliance and Enforcement Section  
Central Valley Regional Water Quality Control Board  
11020 Sun Center Drive, Suite 200  
Rancho Cordova, CA 95670-6114

SUBJECT: eSMR<sup>2</sup> QUARTERLY SELF-MONITORING REPORT SUBMITTAL FOR  
October - December 2013 FOR, California Sprouts, Sacramento Facility,  
Sacramento County, ORDER R5-2013-0073-012, NPDES No. CA CAG995002  
27

This letter documents the written submission of the Q4 monitoring report.

Chose one:

There were no violations per the requirements during the reporting period.

The following documents are found as attachments with this written submittal:

- NPDES Q4 2013 Reporting sheet
- NPDES Q4 2013 Lab Results 10/14/13
- NPDES Q4 2013 Lab Results 11/30/13
- NPDES Q4 2013 Lab Results 12/09/13

*I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designated to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.*

Sincerely,

Daniel Sholl  
General Manager 

Note: Per Standard Provisions, Reporting sections V.B.2 and V.B.3, the LRO must be a principal executive officer or ranking elected official of the Discharger's agency, or a duly authorized representative that meets the intent of 40 CFR 122.22(b)(2).

Parameter	Concentration	Date Sampled	Effluent Limit	Lab Reporting Limit
Location	EFF-001 4Q, 2013		Monthly Average	
Sampling Date				
Flow	64,127 gallons/day	Average over sample period		
Electrical Conductivity (EC) at 25° C	450 µmhos/cm	10/14/2013	700 µmhos/cm	1.00 µmhos/cm
Electrical Conductivity (EC) at 25° C	540 µmhos/cm	11/30/2013	700 µmhos/cm	1.00 µmhos/cm
Electrical Conductivity (EC) at 25° C	490 µmhos/cm	12/9/2013	700 µmhos/cm	1.00 µmhos/cm
pH	7.00 SU		>6.5 and <8.5	
Average Water Temp	68.0 °F			



# IEH - JL ANALYTICAL

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California Sprouts-Warehouse Way

5640 Warehouse Way  
Sacramento, CA 95826

Report # L2.2-14R25499  
Report Date: 10/21/2013  
Received Date: 10/14/2013  
Work Order: 307481

Laboratory Number: 30748101  
Description: Waste Water, Test Permit, 10-14-13, 735

## Analytical Results

Constituent	Result	Minimum Level	Method Detection Limit	Method Reference	Analysis Date	Analysis Time	Analyst
Electrical Conductivity (E.C.)	450 umho/cm	1.0	1.0	SM 2510B <sup>5</sup>	10/18/2013	16:40	JA

## QC Results

Constituent	QC Units	Blank	Matrix	Theoretical Spike	Matrix Spike	Matrix Spike Duplicate	Lab Control Spike	Precision %	Accuracy %	Response %
Electrical Conductivity (E.C.)	umho/cm	< 1	450	1400	1700	1700	1400	0.5	93.2	99.9

Note

Notes

At 25 °C

Authorized By: *Amos Snider*

10/21/2013

Amos Snider Laboratory Supervisor

Unauthorized written approval of the laboratory



# IEH - JL ANALYTICAL

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California Sprouts - Warehouse Way

5640 Warehouse Way  
Sacramento, CA 95826

Report # L2.2-14R26122  
Report Date: 12/05/2013  
Received Date: 12/02/2013  
Work Order: 311378

Laboratory Number: 31137801  
Description: Waste Water, Test Permit, 11-30-13, 500

## Analytical Results

Constituent	Result	Minimum Level	Method Detection Limit	Method Reference	Analysis Date	Analysis Time	Analyst
Electrical Conductivity (E.C.)	540 umho/cm	1.0	1.0	SM 2510B <sup>5</sup>	12/04/2013	15:09	JA

## QC Results

Constituent	QC Units	Blank	Matrix	Theoretical Spike	Matrix Spike	Matrix Spike Duplicate	Lab Control Spike	Precision %	Accuracy %	Response %
Electrical Conductivity (E.C.)	umho/cm	< 1	540	1400	1800	1800	1400	0.3	93.1	100.4

Notes

Authorized By: *Amos Snider*

12/05/2013

Amos Snider Laboratory Supervisor



# IEH - JL ANALYTICAL

217 Primo Way • Modesto, California 95368 • Office (209) 538-0111 • FAX (209) 538-2968

California Sprouts-Warehouse Way

5640 Warehouse Way  
Sacramento, CA 95826

Report # L2.2-14R26221  
Report Date: 12/13/2013  
Received Date: 12/09/2013  
Work Order: 311891

Laboratory Number: 31189101  
Description: Waste Water, Test Permit, 12-9-13, 800

## Analytical Results

Constituent	Result	Minimum Level	Method Detection Limit	Method Reference	Analysis Date	Analysis Time	Analyst
Electrical Conductivity (E.C.)	490 umho/cm	1.0	1.0	SM 2510B <sup>5</sup>	12/12/2013	16:55	JA

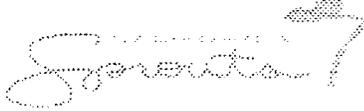
## QC Results

Constituent	QC Units	Blank	Matrix	Theoretical Spike	Matrix Spike	Matrix Spike Duplicate	Lab Control Spike	Precision %	Accuracy %	Response %
Electrical Conductivity (E.C.)	umho/cm	< 1	490	1400	1700	1800	1400	0.6	92.3	99.9

*Handwritten note:* JH print 12/13/13 by SEM CLK

### Notes

Authorized By: Amos Snider 12/13/2013  
Amos Snider Laboratory Supervisor



June 6, 2014

Lucio Orellana  
Compliance and Enforcement Section  
Central Valley Regional Water Quality Control Board  
11020 Sun Center Drive, Suite 200  
Rancho Cordova, CA 95670-6114

SUBJECT: eSMR<sup>2</sup> QUARTERLY SELF-MONITORING REPORT SUBMITTAL FOR  
January – March 2014 FOR, California Sprouts, Sacramento Facility, Sacramento  
County, ORDER R5-2013-0073-012, NPDES No. CA CAG995002

27

This letter documents the written submission of the Q1 monitoring report.

Chose one:

There were no violations per the requirements during the reporting period.

The following documents are found as attachments with this written submittal:

- NPDES Q1 2014 Reporting sheet
- NPDES Q1 2014 Lab Results 01/24/14
- NPDES Q1 2014 Lab Results 02/10/14
- NPDES Q1 2014 Lab Results 03/08/14

*I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designated to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.*

Sincerely,

Daniel Sholl  
General Manager 

Note: Per Standard Provisions, Reporting sections V.B.2 and V.B.3, the LRO must be a principal executive officer or ranking elected official of the Discharger's agency, or a duly authorized representative that meets the intent of 40 CFR 122.22(b)(2).

Parameter	Concentration	Date Sampled	Effluent Limit	Lab Reporting Limit
Location	EFF-001		Monthly Average	
Sampling Date	1Q, 2014			
Flow	70,512 gallons/day	Average over sample period		
Electrical Conductivity (EC) at 25° C	440 µmhos/cm	1/24/2014	700 µmhos/cm	1.00 µmhos/cm
Electrical Conductivity (EC) at 25° C	430 µmhos/cm	2/10/2014	700 µmhos/cm	1.00 µmhos/cm
Electrical Conductivity (EC) at 25° C	430 µmhos/cm	3/8/2014	700 µmhos/cm	1.00 µmhos/cm
pH	7.00 SU		>6.5 and <8.5	
Average Water Temp	69.0 °F			



# IEH - JL ANALYTICAL

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California Sprouts-Warehouse Way

5640 Warehouse Way  
Sacramento, CA 95826

Report # **L2.2-14R26529**  
Report Date: **01/13/2014**  
Received Date: **01/09/2014**  
Work Order: **313511**

Laboratory Number: 31351101  
Description: Waste Water, Test Permit, 1-9-14, 630

## Analytical Results

Constituent	Result	Minimum Level	Method Detection Limit	Method Reference	Analysis Date	Analysis Time	Analyst
Electrical Conductivity (E.C.)	470 umho/cm	1.0	1.0	SM 2510B <sup>5</sup>	01/10/2014	16:18	JA

## QC Results

Constituent	QC Units	Blank	Matrix	Theoretical Spike	Matrix Spike	Matrix Spike Duplicate	Lab Control Spike	Precision %	Accuracy %	Response %
Electrical Conductivity (E.C.)	umho/cm	< 1	470	1400	1700	1800	1400	0.9	93.5	99.9

Note

Notes

At 25 °C

Authorized By Gayle Parquer 01/13/2014  
Gayle Parquer, Chemist



# IEH - JL ANALYTICAL

217 Prima Way • Modesto, California 95358 • Office (209) 538-8111 • FAX (209) 538-3366

California Sprouts-Warehouse Way

5640 Warehouse Way  
Sacramento, CA 95826

Report # L2.2-14R26905  
Report Date: 02/11/2014  
Received Date: 02/10/2014  
Work Order: 315431

Laboratory Number: 31543101  
Description: Waste Water, Test Permit, 2-10-14

## Analytical Results

Constituent	Result	Minimum Level	Method Detection Limit	Method Reference	Analysis Date	Analysis Time	Analyst
Electrical Conductivity (E.C.)	430 umho/cm	1.0	1.0	SM 2510B <sup>5</sup>	02/10/2014	16:17	JA

## QC Results

Constituent	QC Units	Blank	Matrix	Theoretical Spike	Matrix Spike	Matrix Spike Duplicate	Lab Control Spike	Precision %	Accuracy %	Response %
Electrical Conductivity (E.C.)	umho/cm	< 1	430	1400	1700	1700	1400	0.3	94.3	99.9

### Notes

At 25 °C

Authorized By: *Amos Snider*

02/11/2014

Amos Snider Laboratory Supervisor



# IEH - JL ANALYTICAL

217 Primo Way • Modesto, California 95358 • Office (209) 538-6111 • FAX (209) 538-3968

California Sprouts-Warehouse Way

5640 Warehouse Way  
Sacramento, CA 95826

Report # L2.2-14R27370  
Report Date: 03/14/2014  
Received Date: 03/10/2014  
Work Order: 317049

Laboratory Number: 31704901  
Description: Waste Water, Test Permit, 3-8-14, 630

## Analytical Results

Constituent	Result	Minimum Level	Method Detection Limit	Method Reference	Analysis Date	Analysis Time	Analyst
Electrical Conductivity (E.C.)	430 umho/cm	1.0	1.0	SM 2510B <sup>5</sup>	03/13/2014	14:41	JA

## QC Results

Constituent	QC Units	Blank	Matrix	Theoretical Spike	Matrix Spike	Matrix Spike Duplicate	Lab Control Spike	Precision %	Accuracy %	Response %
Electrical Conductivity (E.C.)	umho/cm	< 1	430	1400	1700	1700	1400	0.2	93.7	100.0

### Notes

At 25 °C

Authorized By: *Amos Snider*

03/14/2014

Amos Snider Laboratory Supervisor