



EDMUND G. BROWN JR.  
GOVERNOR



MATTHEW RODRIGUEZ  
SECRETARY FOR  
ENVIRONMENTAL PROTECTION

California Regional Water Quality Control Board, San Diego Region

August 10, 2012

Mr. C.F. Koehler, Owner  
Koehler Kraft Co. Inc.  
2302 Shelter Island Dr.  
San Diego, CA 92106

In reply refer to:  
CIWQS Place ID: 235175  
WDID: 9 000000474  
KSchwall

Dear Mr. Koehler:

**SUBJECT: Review of Self-Monitoring Reports (SMRs) for Order No. R9-2005-0150;  
NPDES No. CA0109096**

**FACILITY: Koehler Kraft**

The California Regional Water Quality Control Board, San Diego Region (San Diego Water Board) staff has reviewed the SMRs for the facility referenced above:

MONITORING REPORTS REVIEWED FOR ORDER NO. R9-2005-0150			
FREQUENCY	PERIOD	REPORT DATE	DATE RECEIVED
Quarterly:	Oct – Dec 2011	January 5, 2012	January 12, 2012
	Jan – Mar 2012	March 30, 2012	April 11, 2012

Based upon our review of the information contained in the monitoring reports, the San Diego Water Board has included the following violations below:

- **Attachment E – Monitoring & Reporting Program (MRP) – Section X.B.2**
  1. Quarterly SMRs shall include non-storm water discharge visual observations. The following quarterly reports did not include the non-storm water discharge visual observations:
    - i. October-December 2011;
    - ii. January-March 2012.

Please take steps to ensure that the violations noted above do not occur in the future. Pursuant to the California Water Code (CWC), the violations noted are subject to additional enforcement action(s) by the San Diego Water Board including a time schedule order, cease and desist order, cleanup and abatement order, imposition of administrative civil liability, referral to the district attorney for criminal prosecution, or referral to the attorney general.

Mr. Koehler  
Koehler Kraft Co. Inc.

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Administrative civil liability amounts that may be imposed by the Regional Board under authority of CWC Section 13385 include up to \$10,000 per day, or up to \$10 per gallon for each gallon of waste discharged.

In the subject line of any response, please include the information located in the heading of this letter: "in reply refer to." For questions or comments, please contact Kristin Schwall at 858-467-2345 or [kschwall@waterboards.ca.gov](mailto:kschwall@waterboards.ca.gov).

Respectfully,

*Robert Morris*

Robert W. Morris  
Senior Water Resource Control Engineer

Tech Staff Info & Use
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Order No.	R9-2005-0150
NPDES No.	CA0109096
CIWQS Place ID	235175
WDID	9 000000474
Reg. Measure No.	307011 (R9-2005-0150)
Violation ID	(1) 927881 & 927890
Enforcement	385561