

3. Evidence that Culver City's summer dry weather discharges into the Santa Monica Bay or Marina del Rey Harbor are treated to a level that does not exceed either the single sample or geometric mean bacteria RWLs.

CIVIL LIABILITY

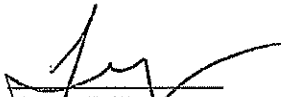
Pursuant to CWC § 13385(a)(3), the City of Culver City is subject to penalties of up to \$10,000 for any violation of the requirements set forth in this Order. These civil liabilities may be assessed by the Regional Board beginning with the date on which a violation of this Order first occurred, and without further warning. The Regional Board may also request that the State Attorney General seek judicially imposed civil liabilities of up to \$25,000 for each day in which a violation occurs, or injunctive relief, pursuant to CWC §§ 13385 and 13386. The City of Culver City may also be subject to penalties pursuant to other sections, and other forms of enforcement proceedings, in addition to those described above, if compliance does not timely occur.

RIGHT TO PETITION

Pursuant to CWC § 13320, an aggrieved person may seek review of this Order by filing a petition within 30 days of the date of this Order with the State Water Resources Control Board (SWRCB). The petition must be sent to the SWRCB, P.O. Box 100, Sacramento, CA 95812.

If you have any questions regarding this matter, please contact me at (213) 576-6605, or alternatively, your staff may contact Mr. Carlos Urrunaga at (213) 620-2083.

Sincerely,


Tracy J. Egoscue
Executive Officer

Enclosure: Notice of Violation, dated March 4, 2008

cc: Mr. Kaden Young, Associate Engineer, City of Culver City
Mr. Michael Levy, Office of Chief Counsel, State Water Resources Control Board
Mr. Bruce Fujimoto, Storm Water Section, State Water Resources Control Board
Mr. Eugene Bromley, U.S. EPA, Region 9

California Environmental Protection Agency



Our mission is to preserve and enhance the quality of California's water resources for the benefit of present and future generations.

EXHIBIT B



California Regional Water Quality Control Board

Los Angeles Region

Recipient of the 2001 *Environmental Leadership Award* from Keep California Beautiful



Linda S. Adams
Agency Secretary

320 W. 4th Street, Suite 200, Los Angeles, California 90013
Phone (213) 576-6600 FAX (213) 576-6640 - Internet Address: <http://www.waterboards.ca.gov/losangeles>

Arnold Schwarzenegger
Governor

March 4, 2008

Mr. Jerry B. Fulwood
Chief Administrative Officer
City of Culver City
9770 Culver Blvd
Culver City, CA 90232-0507

VIA CERTIFIED MAIL

NOTICE OF VIOLATION (ORDER NO. 01-182 AS AMENDED BY ORDER NO. R4-2006-0074 AND ORDER NO. R4-2007-0042, NPDES PERMIT NO. CAS004001, WDID 4B190165001)

Dear Mr. Fulwood:

The California Regional Water Quality Control Board, Los Angeles Region (Regional Board) is the state regulatory agency responsible for protecting water quality in Los Angeles and Ventura Counties. To accomplish this, the Regional Board issues permits under the National Pollutant Discharge Elimination System (NPDES) as authorized by the federal Clean Water Act. On December 13, 2001, this Regional Board adopted the Los Angeles County Municipal Separate Storm Sewer System Permit, NPDES Permit No. CAS004001, Order No. 01-182 (LA MS4 Permit), under which the City of Culver City is a Permittee.

BACKGROUND

The LA MS4 Permit includes Discharge Prohibitions, Receiving Water Limitations, and a Monitoring and Reporting Program, among other requirements. Under Part 1, Discharge Prohibitions, the LA MS4 Permit requires that the Permittees "effectively prohibit non-storm water discharges into the MS4 [municipal separate storm sewer system] and watercourses," except under limited circumstances, as specified in Part 1. Under Part 2, Receiving Water Limitations, the LA MS4 Permit prohibits "discharges from the MS4 that cause or contribute to the violation of Water Quality Standards or water quality objectives."

The LA MS4 Permit was subsequently amended on September 14, 2006 by Order No. R4-2006-0074 and on August 9, 2007 by Order No. R4-2007-0042 to implement the summer dry weather waste load allocations established in the Santa Monica Bay Beaches Bacteria Dry Weather Total Maximum Daily Load (TMDL) and the Marina del Rey Harbor Mothers' Beach and Back Basins Bacteria TMDL. The summer dry weather requirements were incorporated in the LA MS4 Permit as specific Receiving Water Limitations (RWLs) for fecal indicator bacteria in Parts 2.5 and 2.6, and a supporting specific prohibition on discharges from the MS4 that cause or contribute to exceedances of the bacteria RWLs.

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The Permittees collectively discharge urban runoff and storm water from the MS4 to the Santa Monica Bay and Marina del Rey Harbor, navigable waters of the United States, under the provisions and requirements of the LA MS4 Permit. These discharges, as demonstrated via shoreline and harbor water quality monitoring, contain total coliform, fecal coliform, enterococcus and other pollutants, which degrade water quality and impact beneficial uses of the receiving waters at beaches along Santa Monica Bay and within Marina del Rey Harbor. These bacterial indicators are defined as wastes under the California Water Code (CWC § 13000 et seq.).

VIOLATIONS OF RECEIVING WATER LIMITATIONS

The City of Culver City is hereby notified that technical staff has concluded that Culver City is in violation of waste discharge requirements established in Board Order No. 01-182 as amended by Order No. R4-2006-0074 and Order No. R4-2007-0042, and has therefore violated CWC § 13376, and is subject to liability pursuant to CWC § 13385.

The data submitted in the Permittees' shoreline and harbor monitoring reports for the summer dry weather compliance periods, beginning on September 14, 2006 through October 31, 2006 and April 1, 2007 through October 31, 2007, reveal violations of the RWLs set forth in Parts 2.5 and 2.6 of Order No. 01-182 as amended by Order No. R4-2006-0074 and Order No. R4-2007-0042. These violations occurred at nine shoreline and harbor monitoring sites located along Santa Monica Bay beaches and within Marina del Rey Harbor to which the City of Culver City discharges via the MS4, on 297 days, which included 482 instances where the bacteria water quality objectives set to protect water contact recreation were exceeded. These violations are summarized in Table 1, detailed in the attachments, and incorporated herein by reference. The City of Culver City is jointly responsible for violations at these monitoring sites along with the other Permittees with land area within the watersheds draining to these sites.

CIVIL LIABILITY

Pursuant to CWC § 13385, the City of Culver City is subject to penalties of up to \$10,000 for each day in which a violation of RWLs occurs. These civil liabilities may be assessed by the Regional Board beginning with the date that the violations first occurred, and without further warning. The Regional Board may also request that the State Attorney General seek judicially imposed civil liabilities of up to \$25,000 for each day in which a violation occurs, or injunctive relief, pursuant to CWC §§ 13385 and 13386. The City of Culver City may also be subject to penalties pursuant to other sections, and other forms of enforcement proceedings, in addition to those described above.

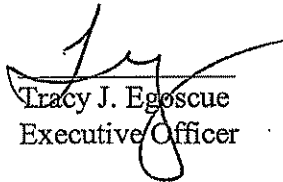
To ensure that the causes of the violations are identified and abated, enclosed herewith, please find an Order directing the City of Culver City to submit a variety of reports pursuant to CWC § 13383. Specifically, these reports shall provide an evaluation and documentation of the causes of these violations, remedial actions to date, and the City's plans for additional corrective and

March 4, 2008

preventative actions to bring discharges from the MS4 into prompt compliance with the bacteria RWLs applicable to the Santa Monica Bay and Marina del Rey Harbor.

If you have any questions regarding this matter, please contact me at (213) 576-6605, or alternatively, your staff may contact Mr. Carlos Urrunaga at (213) 620-2083.

Sincerely,


Tracy J. Egoscue
Executive Officer

Enclosures: Table 1
Attachments 1-8 and 40
Order Pursuant to California Water Code Section 13383, dated March 4, 2008

cc: Mr. Kaden Young, Associate Engineer, City of Culver City
Mr. Michael Levy, Office of Chief Counsel, State Water Resources Control Board
Mr. Bruce Fujimoto, Storm Water Section, State Water Resources Control Board
Mr. Eugene Bromley, U.S. EPA, Region 9

California Environmental Protection Agency

 Recycled Paper

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TABLE 1

CULVER CITY
SUMMARY OF VIOLATIONS OF BACTERIA
RECEIVING WATER LIMITATIONS FOR SUMMER DRY WEATHER
ORDER NO. 01-182 AS AMENDED BY ORDERS R4-2006-0074 AND R4-2007-0042

Site ID	Single Sample RWL Violations				30-day Geometric Mean RWL Violations			Total RWL Violations by Site	Total Days of Violations by Site
	Total Coliform	Fecal Coliform	Enterococcus	Total Coliform (Fecal:Total Coliform Ratio > 0.1)	Total Coliform	Fecal Coliform	Enterococcus		
MdRH-1	0	9	13	9	0	22	32	85	42
MdRH-2	0	2	4	1	0	0	0	7	6
MdRH-3	0	1	0	1	0	0	0	2	1
MdRH-5	0	3	2	1	28	26	2	62	29
MdRH-6 (D)	0	0	0	0	12	0	0	12	12
MdRH-6 (S)	1	0	0	0	49	0	0	50	49
MdRH-7	0	2	0	2	37	12	0	53	38
MdRH-9 (S)	0	1	1	0	0	0	0	2	1
SMB BC-01	30	15	7	8	113	36	0	209	119
Totals	31	33	27	22	239	96	34	482	297

ATTACHMENTS

**VIOLATIONS OF BACTERIA RECEIVING WATER LIMITATIONS BY
SHORELINE AND HARBOR MONITORING SITES**

**VIOLATIONS OF RECEIVING WATER LIMITATIONS FOR SUMMER DRY WEATHER PERIOD
AUGUST 9, 2007 THROUGH OCTOBER 31, 2007
ORDER NO. 01-182 AS AMENDED BY ORDERS R4-2006-0074 AND R4-2007-0042
SITE ID MDRH-1, MOTHERS' BEACH**

Date of Violation(s)	Single Sample Result (MPN/100 ml)				30-day Geometric Mean Result* (MPN/100 ml)		
	Total Coliform	Fecal Coliform	Enterococcus	Total Coliform (Fecal:Total Coliform Ratio > 0.1)	Total Coliform	Fecal Coliform	Enterococcus
Basin Plan Limits	10000	400	104	1000	1000	200	35
8/15/2007				1100			
8/22/2007			190				
8/25/2007			360				
9/1/2007		3400	830	4200			
9/4/2007		740		1700			
9/5/2007			500	1200			
9/6/2007			410	1500			36
9/7/2007		1500	410	3000			42
9/8/2007		4200	1700	5900			52
9/9/2007							55
9/10/2007							55
9/11/2007			140				57
9/12/2007		1700		1700			61
9/13/2007							58
9/14/2007		430	110				58
9/15/2007			290			204	67
9/16/2007						214	72
9/17/2007						224	72
9/18/2007						214	68
9/19/2007						214	66
9/20/2007						214	66
9/21/2007						214	64
9/22/2007						225	69
9/23/2007						238	70
9/24/2007						233	64
9/25/2007						233	64
9/26/2007						233	64
9/27/2007						226	64
9/28/2007						239	68
9/29/2007						246	71
9/30/2007						263	71
10/1/2007						216	59
10/2/2007		430				223	56
10/3/2007						228	55
10/4/2007						215	54
10/5/2007		430	180			219	52
10/6/2007						212	47
10/7/2007							42
10/19/2007			110				
10/26/2007			660				
10/27/2007		500					

**VIOLATIONS OF RECEIVING WATER LIMITATIONS FOR SUMMER DRY WEATHER PERIOD
AUGUST 9, 2007 THROUGH OCTOBER 31, 2007
ORDER NO. 01-182 AS AMENDED BY ORDERS R4-2006-0074 AND R4-2007-0042
SITE ID MdrRH-1, MOTHERS' BEACH**

Date of Violation(s)	Single Sample Result (MPN/100 ml)				30-day Geometric Mean Result* (MPN/100 ml)		
	Total Coliform	Fecal Coliform	Enterococcus	Total Coliform (Fecal:Total Coliform Ratio > 0.1)	Total Coliform	Fecal Coliform	Enterococcus
Basin Plan Limits	10000	400	104	1000	1000	200	35
10/30/2007				2400			
Total Violations	0	9	13	9	0	22	32

Notes: Site ID refers to sites identified in the "Marina del Rey Harbor Mothers' Beach and Back Basins Bacterial TMDL Coordinated Monitoring Plan," dated June 25, 2007.

* Regional Board staff calculated the rolling 30-day geometric mean values presented.

**VIOLATIONS OF RECEIVING WATER LIMITATIONS FOR SUMMER DRY WEATHER PERIOD
AUGUST 9, 2007 THROUGH OCTOBER 31, 2007
ORDER NO. 01-182 AS AMENDED BY ORDERS R4-2006-0074 AND R4-2007-0042
SITE ID MdrH-2/S9, MOTHERS' BEACH**

Date of Violation(s)	Single Sample Result (MPN/100 ml)				30-day Geometric Mean Result* (MPN/100 ml)		
	Total Coliform	Fecal Coliform	Enterococcus	Total Coliform (Fecal:Total Coliform Ratio > 0.1)	Total Coliform	Fecal Coliform	Enterococcus
Basin Plan Limits	10000	400	104	1000	1000	200	35
9/1/2007			120				
9/5/2007			110				
9/17/2007		580					
10/25/2007			140				
10/26/2007			620				
10/27/2007		2000		2000			
Total Violations	0	2	4	1	0	0	0

Notes: The Site ID MdrH-2 refers to sites identified in the "Marina del Rey Harbor Mothers' Beach and Back Basins Bacterial TMDL Coordinated Monitoring Plan," dated June 25, 2007. The Site ID S9 refers to sites identified in the Monitoring and Reporting Program CI 6948 for Order No. 01-182 as amended by Order No. R4-2006-0074 and Order No. R4-2007-0042. Site MdrH-2 and S9 are the same sampling site.

* Regional Board staff calculated the rolling 30-day geometric mean values presented.

**VIOLATIONS OF RECEIVING WATER LIMITATIONS FOR SUMMER DRY WEATHER PERIOD
AUGUST 9, 2007 THROUGH OCTOBER 31, 2007
ORDER NO. 01-182 AS AMENDED BY ORDERS R4-2006-0074 AND R4-2007-0042
SITE ID MdrH-3, MOTHERS' BEACH**

Date of Violation(s)	Single Sample Result (MPN/100 ml)				30-day Geometric Mean Result* (MPN/100 ml)		
	Total Coliform	Fecal Coliform	Enterococcus	Total Coliform (Fecal:Total Coliform Ratio > 0.1)	Total Coliform	Fecal Coliform	Enterococcus
Basin Plan Limits	10000	400	104	1000	1000	200	35
9/17/2007		2600		2700			
Total Violations	0	1	0	1	0	0	0

Notes: Site ID refers to sites identified in the "Marina del Rey Harbor Mothers' Beach and Back Basins Bacterial TMDL Coordinated Monitoring Plan," dated June 25, 2007.

* Regional Board staff calculated the rolling 30-day geometric mean values presented.

**VIOLATIONS OF RECEIVING WATER LIMITATIONS FOR SUMMER DRY WEATHER PERIOD
AUGUST 9, 2007 THROUGH OCTOBER 31, 2007
ORDER NO. 01-182 AS AMENDED BY ORDERS R4-2006-0074 AND R4-2007-0042
SITE ID MdrH-5, OXFORD BASIN SD**

Date of Violation(s)	Single Sample Result (MPN/100 ml)				30-day Geometric Mean Result* (MPN/100 ml)		
	Total Coliform	Fecal Coliform	Enterococcus	Total Coliform (Fecal:Total Coliform Ratio > 0.1)	Total Coliform	Fecal Coliform	Enterococcus
Basin Plan Limits	10000	400	104	1000	1000	200	35
8/13/2007	>13000	1900	110	>13000			
9/4/2007	>13000	4200	150	>13000	1258	233	
9/5/2007					2261	299	
9/6/2007		1300		6800	2716	382	37
9/7/2007					2716	382	37
9/8/2007					1884	298	
9/9/2007					1884	298	
9/10/2007					1799	247	
9/11/2007					1799	247	
9/12/2007					1356		
9/13/2007					1356		
9/14/2007					1011	219	
9/15/2007					1011	219	
9/16/2007					1011	219	
9/19/2007					1011	219	
9/20/2007					1011	219	
9/21/2007					1011	219	
9/22/2007					1011	219	
9/23/2007					1011	219	
9/24/2007					1011	219	
9/25/2007					1011	219	
9/26/2007					1101	277	
9/27/2007					1101	277	
9/28/2007					1101	277	
9/29/2007					1101	277	
9/30/2007					1101	277	
10/1/2007					1172	219	
10/2/2007					1172	219	
10/3/2007					1172	219	
Total Violations	0	3	2	1	28	26	2

Notes: Site ID refers to sites identified in the "Marina del Rey Harbor Mothers' Beach and Back Basins Bacterial TMDL Coordinated Monitoring Plan," dated June 25, 2007.

* Regional Board staff calculated the rolling 30-day geometric mean values presented.

**VIOLATIONS OF RECEIVING WATER LIMITATIONS FOR SUMMER DRY WEATHER PERIOD
AUGUST 9, 2007 THROUGH OCTOBER 31, 2007
ORDER NO. 01-182 AS AMENDED BY ORDERS R4-2006-0074 AND R4-2007-0042
SITE ID MDRH-6 DEPTH, BASIN E**

Date of Violation(s)	Single Sample Result (MPN/100 ml)				30-day Geometric Mean Result* (MPN/100 ml)		
	Total Coliform	Fecal Coliform	Enterococcus	Total Coliform (Fecal:Total Coliform Ratio > 0.1)	Total Coliform	Fecal Coliform	Enterococcus
Basin Plan Limits	10000	400	104	1000	1000	200	35
10/10/2007					1149		
10/11/2007					1149		
10/12/2007					1149		
10/13/2007					1149		
10/14/2007					1149		
10/15/2007					1149		
10/16/2007					1149		
10/17/2007					1124		
10/18/2007					1124		
10/19/2007					1124		
10/20/2007					1124		
10/21/2007					1124		
Total Violations	0	0	0	0	12	0	0

Notes: Site ID refers to sites identified in the "Marina del Rey Harbor Mothers' Beach and Back Basins Bacterial TMDL Coordinated Monitoring Plan," dated June 25, 2007.

* Regional Board staff calculated the rolling 30-day geometric mean values presented.

**VIOLATIONS OF RECEIVING WATER LIMITATIONS FOR SUMMER DRY WEATHER PERIOD
AUGUST 9, 2007 THROUGH OCTOBER 31, 2007
ORDER NO. 01-182 AS AMENDED BY ORDERS R4-2006-0074 AND R4-2007-0042
SITE ID MdrH-6 SURFACE, BASIN E**

Date of Violation(s)	Single Sample Result (MPN/100 ml)				30-day Geometric Mean Result* (MPN/100 ml)		
	Total Coliform	Fecal Coliform	Enterococcus	Total Coliform (Fecal:Total Coliform Ratio > 0.1)	Total Coliform	Fecal Coliform	Enterococcus
Basin Plan Limits	10000	400	104	1000	1000	200	35
8/9/2007					1932		
8/10/2007					1932		
8/11/2007					1932		
8/12/2007					1932		
8/13/2007	17000				2535		
8/14/2007					2535		
8/15/2007					2877		
8/16/2007					2877		
8/17/2007					2603		
8/18/2007					2603		
8/19/2007					2603		
8/20/2007					2072		
8/21/2007					2072		
8/22/2007					3113		
8/23/2007					3113		
8/24/2007					3113		
8/25/2007					3113		
8/26/2007					3113		
8/27/2007					2864		
8/28/2007					2864		
8/29/2007					2465		
8/30/2007					2465		
8/31/2007					1868		
9/1/2007					1868		
9/2/2007					1825		
9/3/2007					1825		
9/4/2007					1570		
9/5/2007					2305		
9/6/2007					2305		
9/7/2007					2305		
9/8/2007					2305		
9/9/2007					2305		
9/10/2007					1602		
9/11/2007					1602		
10/17/2007					1006		
10/18/2007					1006		
10/19/2007					1006		
10/20/2007					1006		
10/21/2007					1006		
10/22/2007					1948		
10/23/2007					1948		
10/24/2007					1948		
10/25/2007					1948		
10/26/2007					1948		

**VIOLATIONS OF RECEIVING WATER LIMITATIONS FOR SUMMER DRY WEATHER PERIOD
AUGUST 9, 2007 THROUGH OCTOBER 31, 2007
ORDER NO. 01-182 AS AMENDED BY ORDERS R4-2006-0074 AND R4-2007-0042
SITE ID MDRH-6 SURFACE, BASIN E**

Date of Violation(s)	Single Sample Result (MPN/100 ml)				30-day Geometric Mean Result* (MPN/100 ml)		
	Total Coliform	Fecal Coliform	Enterococcus	Total Coliform (Fecal:Total Coliform Ratio > 0.1)	Total Coliform	Fecal Coliform	Enterococcus
Basin Plan Limits	10000	400	104	1000	1000	200	35
10/27/2007					1948		
10/28/2007					1948		
10/29/2007					1343		
10/30/2007					1343		
10/31/2007					1139		
Total Violations	1	0	0	0	49	0	0

Notes: Site ID refers to sites identified in the "Marina del Rey Harbor Mothers' Beach and Back Basins Bacterial TMDL Coordinated Monitoring Plan," dated June 25, 2007.

* Regional Board staff calculated the rolling 30-day geometric mean values presented.

**VIOLATIONS OF RECEIVING WATER LIMITATIONS FOR SUMMER DRY WEATHER PERIOD
AUGUST 9, 2007 THROUGH OCTOBER 31, 2007
ORDER NO. 01-182 AS AMENDED BY ORDERS R4-2006-0074 AND R4-2007-0042
SITE ID MdrH-7, BOONE-OLIVE PLANT SD**

Date of Violation(s)	Single Sample Result (MPN/100 ml)				30-day Geometric Mean Result* (MPN/100 ml)		
	Total Coliform	Fecal Coliform	Enterococcus	Total Coliform (Fecal:Total Coliform Ratio > 0.1)	Total Coliform	Fecal Coliform	Enterococcus
Basin Plan Limits	10000	400	104	1000	1000	200	35
8/13/2007		500			1209		
8/14/2007					1209		
8/15/2007					1318	206	
8/16/2007					1318	206	
8/17/2007					1318	206	
8/18/2007					1318	206	
8/19/2007					1318	206	
8/22/2007					1318	206	
8/23/2007					1318	206	
8/24/2007					1318	206	
8/25/2007					1318	206	
8/26/2007					1318	206	
8/27/2007		430		3700	1500	226	
8/28/2007					1500	226	
8/29/2007					1281		
8/30/2007					1281		
8/31/2007					1067		
9/1/2007					1067		
9/2/2007					1095		
9/3/2007					1095		
9/5/2007					1044		
9/6/2007					1044		
9/7/2007					1044		
9/8/2007					1044		
9/9/2007					1044		
9/10/2007					1010		
9/11/2007					1010		
10/1/2007				1400			
10/22/2007					1609		
10/23/2007					1609		
10/24/2007					1609		
10/25/2007					1609		
10/26/2007					1609		
10/27/2007					1609		
10/28/2007					1609		
10/29/2007					1186		
10/30/2007					1186		
10/31/2007					1138		
Total Violations	0	2	0	2	37	12	0

Notes: Site ID refers to sites identified in the "Marina del Rey Harbor Mothers' Beach and Back Basins Bacterial TMDL Coordinated Monitoring Plan," dated June 25, 2007.

* Regional Board staff calculated the rolling 30-day geometric mean values presented.

**VIOLATIONS OF RECEIVING WATER LIMITATIONS FOR SUMMER DRY WEATHER PERIOD
AUGUST 9, 2007 THROUGH OCTOBER 31, 2007
ORDER NO. 01-182 AS AMENDED BY ORDERS R4-2006-0074 AND R4-2007-0042
SITE ID MdrH-9 SURFACE, BASIN F**

Date of Violation(s)	Single Sample Result (MPN/100 ml)				30-day Geometric Mean Result* (MPN/100 ml)		
	Total Coliform	Fecal Coliform	Enterococcus	Total Coliform (Fecal:Total Coliform Ratio > 0.1)	Total Coliform	Fecal Coliform	Enterococcus
Basin Plan Limits	10000	400	104	1000	1000	200	35
8/13/2007		470	890				
Total Violations	0	1	1	0	0	0	0

Notes: Site ID refers to sites identified in the "Marina del Rey Harbor Mothers' Beach and Back Basins Bacterial TMDL Coordinated Monitoring Plan," dated June 25, 2007.

* Regional Board staff calculated the rolling 30-day geometric mean values presented.

**VIOLATIONS OF RECEIVING WATER LIMITATIONS FOR SUMMER DRY WEATHER PERIODS
 SEPTEMBER 14, 2006 - OCTOBER 31, 2006 AND APRIL 1, 2007 - OCTOBER 31, 2007
 ORDER 01-182 AS AMENDED BY R4-2006-0074 AND R4-2007-0042
 SITE ID SMB-BC-01, BALLONA CREEK**

Date of Violation(s)	Single Sample Result (MPN/100 ml)				30-day Geometric Mean Result* (MPN/100 ml)		
	Total Coliform	Fecal Coliform	Enterococcus	Total Coliform (Fecal:Total Coliform Ratio > 0.1)	Total Coliform	Fecal Coliform	Enterococcus
Basin Plan Limit	10000	400	104	1000	1000	200	35
9/14/2006					1452		
9/15/2006					1225		
9/16/2006					1176		
9/17/2006					1186		
9/18/2006					1180		
9/19/2006					1137		
9/20/2006					1020		
4/24/2007	>13000	4400	190	>13000			
6/15/2007				1900			
6/22/2007	11000						
6/28/2007	11000						
6/30/2007			140		1092		
7/1/2007					1096		
7/2/2007					1191		
7/3/2007					1315		
7/4/2007					1259		
7/5/2007					1423		
7/6/2007					1516		
7/7/2007					1587		
7/8/2007					1512		
7/9/2007					1536		
7/10/2007					1505		
7/11/2007					1307		
7/12/2007					1513		
7/13/2007	13000				1755		
7/14/2007					1817		
7/15/2007					1813		
7/16/2007					1814		
7/17/2007	>13000				1992		
7/18/2007	>13000				2170		
7/19/2007	>13000				2675		
7/20/2007					2161		
7/21/2007	>13000				2746		
7/22/2007					2570		
7/23/2007					2531		
7/24/2007					2599		
7/25/2007					2427		
7/26/2007	13000				2612		
7/27/2007	>13000				2910		
7/28/2007					2650		
7/29/2007					2602		
7/30/2007					2563		
7/31/2007					2482		
8/1/2007	13000				2676		

**VIOLATIONS OF RECEIVING WATER LIMITATIONS FOR SUMMER DRY WEATHER PERIODS
 SEPTEMBER 14, 2006 - OCTOBER 31, 2006 AND APRIL 1, 2007 - OCTOBER 31, 2007
 ORDER 01-182 AS AMENDED BY R4-2006-0074 AND R4-2007-0042
 SITE ID SMB-BC-01, BALLONA CREEK**

Date of Violation(s)	Single Sample Result (MPN/100 ml)				30-day Geometric Mean Result* (MPN/100 ml)		
	Total Coliform	Fecal Coliform	Enterococcus	Total Coliform (Fecal:Total Coliform Ratio > 0.1)	Total Coliform	Fecal Coliform	Enterococcus
Basin Plan Limit:	10000	400	104	1000	1000	200	35
8/2/2007	>13000				2713		
8/3/2007	>13000	500			3146		
8/4/2007	>13000				3535		
8/5/2007					3427		
8/6/2007					3255		
8/7/2007	13000				3477		
8/8/2007	13000				3691		
8/9/2007					4001		
8/10/2007	>13000				5084		
8/11/2007					5039		
8/12/2007					4817		
8/13/2007					5553		
8/14/2007	11000	1300		11000	5737		
8/15/2007	>13000	6800		>13000	5955		
8/16/2007	>13000	11000		>13000	5955		
8/17/2007	11000	5500		11000	5909	235	
8/18/2007	>13000	13000		>13000	5909	299	
8/19/2007					7315	321	
8/20/2007					7107	336	
8/21/2007					6983	337	
8/22/2007			590		6837	329	
8/23/2007	>13000	1100			7183	374	
8/24/2007	13000				8273	403	
8/25/2007					7647	391	
8/26/2007					7456	426	
8/27/2007					8106	467	
8/28/2007					7618	426	
8/29/2007					6888	391	
8/30/2007					7316	403	
8/31/2007	>13000	1300			7316	461	
9/1/2007		830			7216	502	
9/2/2007					7017	502	
9/3/2007					6803	524	
9/4/2007		500			6852	523	
9/5/2007					6958	491	
9/6/2007	13000	500			6958	499	
9/7/2007					6041	468	
9/8/2007					5723	454	
9/9/2007					5504	460	
9/10/2007					5894	506	
9/11/2007					5679	460	
9/12/2007	>13000	430			5897	458	
9/13/2007	>13000	1800		>13000	5942	465	
9/14/2007	>13000	830			5942	423	

**VIOLATIONS OF RECEIVING WATER LIMITATIONS FOR SUMMER DRY WEATHER PERIODS
 SEPTEMBER 14, 2006 - OCTOBER 31, 2006 AND APRIL 1, 2007 - OCTOBER 31, 2007
 ORDER 01-182 AS AMENDED BY R4-2006-0074 AND R4-2007-0042
 SITE ID SMB-BC-01, BALLONA CREEK**

Date of Violation(s)	Single Sample Result (MPN/100 ml)				30-day Geometric Mean Result* (MPN/100 ml)		
	Total Coliform	Fecal Coliform	Enterococcus	Total Coliform (Fecal:Total Coliform Ratio > 0.1)	Total Coliform	Fecal Coliform	Enterococcus
Basin Plan Limit	10000	400	104	1000	1000	200	35
9/15/2007					5598	335	
9/16/2007					5421	293	
9/17/2007					5189	243	
9/18/2007					5220	241	
9/19/2007					4822	227	
9/20/2007					3967	211	
9/21/2007					3948	211	
9/22/2007					3719		
9/23/2007					3482		
9/24/2007					3563		
9/25/2007					3543		
9/26/2007	13000				3781		
9/27/2007					3722		
9/28/2007			140		3879		
9/29/2007			150		3785		
9/30/2007					3547		
10/1/2007					3356		
10/2/2007					3036		
10/3/2007					2753		
10/4/2007					2594		
10/5/2007					2143		
10/6/2007					1821		
10/7/2007					1934		
10/8/2007					1941		
10/9/2007					1753		
10/10/2007					1577		
10/11/2007					1355		
10/12/2007					1203		
10/13/2007					1054		
10/23/2007			110				
10/25/2007			320				
Total Violations	30	15	7	8	113	36	0

Notes: Site ID refers to sites identified in the "Santa Monica Bay Beaches Bacterial TMDLs Coordinated Shoreline Monitoring Plan," dated April 7, 2004.

* Regional Board staff calculated the rolling 30-day geometric mean values presented.

EXHIBIT C

Sedina L. Banks
Direct Dial: 310.201.7436
Direct Fax: 310.201.4456
E-Mail: sbanks@ggfirm.com
File Number: 14314-00016



April 3, 2008

***Via E-Mail and
Certified Mail - Return Receipt Requested***

Tracy J. Egoscue
Executive Officer
California Regional Water Quality Control Board - LA Region
320 West 4th Street
Suite 200
Los Angeles, CA 90013

Re: Order Pursuant to California Water Code Section 13383 (Regarding Violations of Order No. 01-182 As Amended by Order No. R4-2006-0074 and Order No. R4-2007-0042, NPDES Permit No. CAS004001, WDID 4B190165001) and Notice of Violation (Order No. 01-182 As Amended by Order No. R4-2006-0074 and Order No. R4-2007-0042, NPDES Permit No. CAS004001, WDID 4B190165001)

Dear Ms. Egoscue:

We represent the City of Culver City ("the City"). Please find enclosed the City's Petition for Review of "Order Pursuant to California Water Code Section 13383 (Regarding Violations of Order No. 01-182 As Amended by Order No. R4-2006-0074 and Order No. R4-2007-0042, NPDES Permit No. CAS004001, WDID 4B190165001)" and "Notice of Violation (Order No. 01-182 As Amended by Order No. R4-2006-0074 and Order No. R4-2007-0042, NPDES Permit No. CAS004001, WDID 4B190165001)" issued by the California Regional Water Quality Control Board, Los Angeles Region on March 4, 2008.

The City is requesting that the State Board hold this petition in abeyance pursuant to California Code of Regulations, title 23, section 2050.5(d).

Tracy J. Egoscue

April 3, 2008

Page 2

Please contact me if you have any questions. Thank you.

Regards,


Sedina L. Banks

SLB/sl

Enclosures

cc: Jerry Fulwood, City Manager
Carol Schwab, Esq., City Attorney, City of Culver City
Heather Baker, Esq., Assistant City Attorney, City of Culver City
Charles Herbertson, Public Works Director
David E. Cranston, Esq.

EXHIBIT D

Attachment A to Resolution No. 06-011

Amendment to the Water Quality Control Plan – Los Angeles Region to incorporate the TMDL for Bacterial Indicator Densities in Ballona Creek, Ballona Estuary, and Sepulveda Channel.

Adopted by the California Regional Water Quality Control Board, Los Angeles Region on June 8, 2006.

Amendments:

Table of Contents

Add:

Chapter 7. Total Maximum Daily Loads (TMDLs) Summaries
7-21 Ballona Creek, Ballona Estuary and Sepulveda Channel Bacteria TMDL

List of Figures, Tables and Inserts

Add:

Chapter 7. Total Maximum Daily Loads (TMDLs)

Tables

7-21 Ballona Creek, Ballona Estuary and Sepulveda Channel Bacteria TMDL
7-21.1. Ballona Creek, Ballona Estuary and Sepulveda Channel Bacteria TMDL: Elements
7-21.2a. Ballona Creek, Ballona Estuary and Sepulveda Channel Bacteria TMDL: Final Allowable Exceedance Days by Reach
7.21.2b. Ballona Creek, Ballona Estuary and Sepulveda Channel Bacteria TMDL: WLAs and LAs for tributaries to the Impaired Reaches.
7-21.3. Ballona Creek, Ballona Estuary and Sepulveda Channel Bacteria TMDL: Significant Dates

Chapter 7. Total Maximum Daily Loads (TMDLs) Summaries, Section 7-21 (Ballona Creek, Ballona Estuary, and Sepulveda Channel Bacteria TMDL)

This TMDL was adopted by the Regional Water Quality Control Board on June 8, 2006.

This TMDL was approved by:

The State Water Resources Control Board on [Insert Date].
The Office of Administrative Law on [Insert Date].
The U.S. Environmental Protection Agency on [Insert Date].

The following table includes all the elements of this TMDL.