

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
CENTRAL VALLEY REGION

ADMINISTRATIVE CIVIL LIABILITY ORDER R5-2012-0548

MANDATORY PENALTY  
IN THE MATTER OF

CITY OF WILLIAMS  
WASTEWATER TREATMENT PLANT  
COLUSA COUNTY

This Order is issued to the City of Williams (hereafter Discharger) pursuant to Water Code section 13385, which authorizes the imposition of Administrative Civil Liability (ACL). This Order is based on findings that the Discharger violated provisions of Waste Discharge Requirements (WDRs) Order R5-2008-0185-01 (NPDES No. CA0077933).

The Assistant Executive Officer of the California Regional Water Quality Control Board, Central Valley Region (Central Valley Water Board or Board) finds the following:

1. The Discharger owns and operates the City of Williams Wastewater Treatment Plant (WWTP), which provides sewerage service to the community of Williams in Colusa County. Treated municipal wastewater is discharged to Salt Creek, a water of the United States.
2. On 5 December 2008, effective 5 December 2008, the Central Valley Water Board issued WDRs Order R5-2008-0185 which contained new requirements and rescinded Order 5-01-049, except for enforcement purposes. On 13 August 2009, the Board issued Amended Order R5-2008-0185-01.
3. On 2 August 2007, the Central Valley Water Board adopted Time Schedule Order (TSO) No. R5-2007-0096, which provided a time schedule to comply with the effluent limitations for BOD, total suspended solids, total coliform, turbidity, ammonia and other requirements by 1 October 2010.
4. On 18 September 2008, the Executive Officer issued Administrative Civil Liability (ACL) Order R5-2008-0561, assessing \$2,109,000 for mandatory minimum penalties for the period of 1 January 2000 through 31 December 2007. The violations are specifically listed in Attachment A to the ACL Order. The Order allowed the entire \$2,109,000 to be applied toward construction of a new \$23 million treatment plant, and required that the treatment plant be fully operational by 1 October 2010. However, the project was delayed, and, in December of 2009, the Discharger requested that the time schedule be modified to reflect a final completion date of December of 2011. The Executive Officer approved this request and amended the final deadline for completion of the project to 30 December 2011.
5. On 4 February 2011, the Assistant Executive Officer issued ACL Order R5-2011-0517, which assessed \$126,000 in civil liability for mandatory minimum penalties for 18 April 2001, 29 February 2004, and 1 January 2008 through 31 October 2010. The violations are specifically listed in Attachment A to the ACL Order. The ACL Order allows the Discharger to apply the entire amount of the penalty toward the compliance project

described above, and requires that the new wastewater treatment plant be completed by 30 December 2011.

6. On 24 June 2011, the Assistant Executive Officer issued ACL Order R5-2011-0582, which assessed \$156,000 in civil liability for mandatory minimum penalties for the period 1 November 2010 through 28 February 2011. These violations are specifically listed in Attachment A to the ACL Order. The ACL Order allows the Discharger to apply the entire amount of the penalty toward the compliance project described above, and requires that the new wastewater treatment plant be completed by 30 December 2011.
7. The new wastewater treatment plant was completed on 20 June 2011, prior to the date required by the three ACL Orders.
8. This Order addresses administrative civil liability for effluent violations that occurred during the period from 1 March 2011 through 31 March 2012. These violations are specifically identified in Attachment A to this Order as subject to mandatory minimum penalties. Attachment A is attached hereto and incorporated herein by this reference.
9. On 19 April 2011, the Discharger submitted a request for a 90-day treatment plant start-up waiver from MMPs, as allowed under Water Code section 13385 (j)(1)(D)(i). Water Board staff granted the waiver beginning on 20 June 2011 and ending on 18 September 2011. Mandatory minimum penalties have not been assessed during this period.
10. On 15 February 2012, Central Valley Water Board staff issued the Discharger a Notice of Violation and draft Record of Violations for effluent limitation violations from 1 March 2011 through 31 December 2011.
11. On 28 February 2012, the Discharger responded to the Record of Violations and agreed with all of the violations with the exception of four. Board staff re-reviewed the self-monitoring reports and agreed that these violations were cited in error during a period of no discharge. However, during re-review of the self-monitoring report, Board staff determined two additional violations had occurred. The Discharger requested that all the penalties from violations that occurred prior to startup of the new treatment plant be applied towards the compliance project described in Finding 4. The Discharger also requested that all penalties associated with violations that occurred after startup of the new treatment plant be applied toward a new compliance project, which is described in Finding 26.
12. Water Code sections 13385(h) and (i) require assessment of mandatory penalties and state, in part, the following:

Water Code section 13385(h)(1) states,

Notwithstanding any other provision of this division, and except as provided in subdivisions (j), (k), and (l), a mandatory minimum penalty of three thousand dollars (\$3,000) shall be assessed for each serious violation.

Water Code section 13385 (h)(2) states,

For the purposes of this section, a ‘serious violation’ means any waste discharge that violates the effluent limitations contained in the applicable waste discharge requirements for a Group II pollutant, as specified in Appendix A to Section 123.45 of Title 40 of the Code of Federal Regulations, by 20 percent or more or for a Group I pollutant, as specified in Appendix A to Section 123.45 of Title 40 of the Code of Federal Regulations, by 40 percent or more.

Water Code section 13385(i)(1) states,

Notwithstanding any other provision of this division, and except as provided in subdivisions (j), (k), and (l), a mandatory minimum penalty of three thousand dollars (\$3,000) shall be assessed for each violation whenever the person does any of the following four or more times in any period of six consecutive months, except that the requirement to assess the mandatory minimum penalty shall not be applicable to the first three violations:

- A) Violates a waste discharge requirement effluent limitation.
- B) Fails to file a report pursuant to Section 13260.
- C) Files an incomplete report pursuant to Section 13260.
- D) Violates a toxicity effluent limitation contained in the applicable waste discharge requirements where the waste discharge requirements do not contain pollutant-specific effluent limitations for toxic pollutants.”

13. Water Code section 13323 states, in part:

Any executive officer of a regional board may issue a complaint to any person on whom administrative civil liability may be imposed pursuant to this article. The complaint shall allege the act or failure to act that constitutes a violation of law, the provision authorizing civil liability to be imposed pursuant to this article, and the proposed civil liability.”

14. WDRs Order R5-2008-0185-01 Final Effluent Limitations—Discharge Point 001 A.1.a. include, in part, the following effluent limitation:

- a. The Discharger shall maintain compliance with the effluent limitations specified in Table 6:

**Table 6. Effluent Limitations**

Parameter	Units	Effluent Limitations				
		Average Monthly	Average Weekly	Maximum Daily	Instantaneous Minimum	Instantaneous Maximum
BOD (5-day @20°C)	mg/L	10	15	20	--	--
TSS	mg/L	10	15	20	--	--
	lbs/day <sup>1</sup>	40	63	83	--	--
Chlorodibromomethane	µg/L	0.41	--	0.82	--	--
Dichlorobromomethane	µg/L	0.56	--	1.12	--	--

<sup>1</sup> Based on a design flow of 0.5 mgd

15. WDRs Order R5-2008-0185-01 Final Effluent Limitations—Discharge Point 001 A.1.f. include the following effluent limitation:
  - a. **Total Coliform Organisms.** Effluent total coliform organisms shall not exceed:
    - i. 2.2 most probable number (MPN) per 100 mL, as a 7-day median;
    - ii. 23 MPN/100 mL, more than once in any 30-day period; and
    - iii. 240 MPN/100 mL, at any time.
16. According to the Discharger's self-monitoring reports, the Discharger committed twenty-five (25) serious violations of the effluent limitations for Group I constituents contained in WDRs Order R5-2008-0185-01 during the period beginning 1 March 2011 and ending 31 March 2012. The violations are defined as serious because measured concentrations of Group I constituents exceeded maximum prescribed levels by more than 40 percent on these occasions. The mandatory minimum penalty for these serious violations is **seventy-five thousand dollars (\$75,000)**.
17. According to the Discharger's self-monitoring reports, the Discharger committed nine (9) serious violations of the above effluent limitations for Group II constituents contained in WDRs Order R5-2008-0185-01 during the period beginning 1 March 2011 and ending 31 March 2012. These violations are defined as serious because the measured concentrations of Group II constituents exceeded the maximum prescribed level by more than 20 percent on these occasions. The mandatory minimum penalty for these serious violations is **twenty-seven thousand dollars (\$27,000)**.
18. According to the Discharger's self-monitoring reports, the Discharger committed forty (40) non-serious violations of the above effluent limitations contained in WDRs Order R5-2008-0185-01 during the period beginning 1 March 2011 and ending 31 March 2012. These non-serious violations are subject to mandatory penalties under Water Code section 13385 (i)(1) because these violations were preceded by three or more similar violations within a six-month period. The mandatory minimum penalty for these non-serious violations is **one hundred twenty thousand dollars (\$120,000)**.
19. The total amount of the mandatory penalties assessed for the cited effluent violations is **two hundred twenty-two thousand dollars (\$222,000)**. A detailed list of the cited effluent violations is included in Attachment A. This Order addresses administrative civil liability for violations that are specifically listed in Attachment A as subject to mandatory minimum penalties.
20. Water Code section 13385 (k) states:
  - (1) In lieu of assessing all or a portion of the mandatory minimum penalties pursuant to subdivisions (h) and (i) against a publicly owned treatment works serving a small community, the state board or the regional board may elect to require the publicly owned treatment works to spend an equivalent amount towards the completion of a compliance project proposed by the publicly owned treatment works, if the state board or the regional board finds all of the following:
    - (A) The compliance project is designed to correct the violations within five years.

(B) The compliance project is in accordance with the enforcement policy of the state board, excluding any provision in the policy that is inconsistent with this section.

(C) The publicly owned treatment works has prepared a financing plan to complete the compliance project.

(2) For the purposes of this subdivision, "a publicly owned treatment works serving a small community" means a publicly owned treatment works serving a population of 10,000 persons or fewer or a rural county, with a financial hardship as determined by the state board after considering such factors as median income of the residents, rate of unemployment, or low population density in the service area of the publicly owned treatment works.

21. On 6 March 2008, staff at the State Water Resources Control Board transmitted a memorandum determining that the City of Williams Wastewater Treatment Plant is a publicly owned treatment works serving a small community with a financial hardship within the meaning of Water Code section 13385(k)(2). On 4 August 2008, the Executive Director of the State Water Board confirmed this determination. Central Valley Water Board staff has recently confirmed that the City is still a small community with financial hardship.

Compliance Project #1 (new wastewater treatment plant)

22. The Discharger spent an estimated \$23 million on a compliance project to construct a new wastewater treatment plant to meet effluent limitations to correct violations that occurred prior to 20 June 2011. The new treatment plant includes traditional secondary treatment, cloth filters, and an ultra-violet disinfection system. On 23 February 2012, the Discharger submitted documentation certifying that the compliance project was completed prior to 30 December 2011 and documenting costs totaling \$5,440,830.
23. As described in Findings 4, 5, and 6, the Discharger was allowed to apply the previously assessed mandatory minimum penalties totaling \$2,391,000 toward the construction of the new treatment plant, as the construction qualifies as a compliance project within the meaning of Water Code section 13385(k). This Order allows an additional \$180,000 in mandatory minimum penalties which were accrued prior to the startup of the new wastewater treatment plant to be applied towards the same project.
24. After this Order has been issued, the Discharger will have spent a total of \$2,571,000 towards the construction of the new treatment plant in lieu of making a cash payment to the State Water Board's Cleanup and Abatement Account for the total accrued mandatory minimum penalties that occurred prior to startup of the new treatment plant on 20 June 2011. This Order also incorporates the extended "full compliance" deadline from ACLO R5-2008-0560, which has been moved from 1 October 2010 to 30 December 2011. The Discharger has spent over \$23 million and has submitted documentation of \$5,440,830 on the construction of the new plant, which is an amount far in excess of the mandatory minimum penalty that is required to be assessed by Water Code sections 13385(h) and (i).

25. The Central Valley Water Board finds that the Discharger's construction of a new treatment plant qualifies under Water Code section 13385(k) as a compliance project, as the project has been designed to correct the violations that have led to the issuance of this ACLO within five years, the project in accordance with the Water Quality Enforcement Policy of the State Water Board, and the Discharger has prepared a financing plan to complete the project.

Compliance Project #2 (process control)

26. On 28 February 2012, the Discharger submitted documentation showing that it was in the process of spending approximately \$44,000 on a compliance project to improve process control and rectify the total coliform organism violations that occurred between September and December 2011. The Discharger plans to modify treatment plant operations, enhance UV system cleaning, implement a Computer Maintenance Management System (CMMS), and provide additional training and SCADA system modifications. With the implementation of this second compliance project, the new plant will meet permitted effluent limitations. Completion of the entire compliance project will ensure that the new plant continues to meet permitted effluent limitations set forth in the WDRs.
27. The Central Valley Water Board finds that the Discharger's process control compliance project qualifies under Water Code section 13385(k) as a compliance project, as the project was designed to correct the violations that led to the issuance of this ACL Order, the project in accordance with the Water Quality Enforcement Policy of the State Water Board.
28. This Order allows a total of \$42,000 in mandatory minimum penalties to be credited toward the process control compliance project in lieu of making a cash payment to the State Water Board's Cleanup and Abatement Account for the mandatory minimum penalties that occurred between September and December 2011. The Discharger will have spent an amount in excess of the mandatory minimum penalty that is required to be assessed by Water Code sections 13385(h) and (i).
29. This Order constitutes a settlement of the violations herein mentioned. Notice of this settlement was published on the Central Valley Water Board's website, and was provided to all interested parties. The 30-day public notice and comment period mandated by Federal regulations (40 C.F.R. § 123.27) has expired.
30. On 23 April 2009, the Central Valley Water Board delegated the authority to issue Administrative Civil Liability Orders, where the matter is not contested by the Discharger, to the Executive Officer, or to an Assistant Executive Officer when the Executive Officer is serving as head of the Board's Prosecution Team (Resolution R5-2009-0027). Pamela Creedon is serving as the head of the Board's Prosecution Team for this matter, and therefore Assistant Executive Officer Kenneth Landau has the authority to issue this Order.

31. Issuance of this Administrative Civil Liability Order to enforce Water Code Division 7, Chapter 5.5 is exempt from the provisions of the California Environmental Quality Act (Pub. Resources Code § 21000 et seq.), in accordance with California Code of Regulations, title 14, section 15321(a)(2).

**THE CITY OF WILLIAMS IS HEREBY GIVEN NOTICE THAT:**

1. The Discharger shall be assessed an Administrative Civil Liability in the amount of **two hundred twenty-two thousand dollars (\$222,000)**.
2. In accordance with Water Code section 13385(k), the \$180,000 portion of the penalty for violations that occurred prior to 20 June 2011 has been satisfied through the completion of the compliance project described in Finding 22.
3. In accordance with Water Code section 13385(k), the \$42,000 portion of the penalty for violations that occurred after 20 June 2011 shall be deemed satisfied by the Central Valley Water Board if the Discharger complies with the following time schedule to complete the compliance project described in Finding 26:

<u>Compliance Project #2</u>	<u>Compliance Date</u>
Submit a final report documenting completion of the compliance project and full compliance with effluent limitations with WDRs	31 July 2012
Submit final documentation of compliance project costs	31 August 2012

4. This Order is final upon signature.

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 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 that this Order becomes final, except that if the thirtieth day following the date that this Order becomes final 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.

*Original signed by*  
\_\_\_\_\_  
KENNETH D. LANDAU, Assistant Executive Officer

\_\_\_\_\_  
22 June 2012  
DATE

ATTACHMENT A  
ADMINISTRATIVE CIVIL LIABILITY ORDER NO. R5-2012-0548

**City of Williams  
Wastewater Treatment Plant**

RECORD OF VIOLATIONS (1 March 2011 - 31 March 2012) MANDATORY PENALTIES  
(Data reported under Monitoring and Reporting Program R5-2008-0185-01)

	<u>Date</u>	<u>Violation</u>	<u>Units</u>	<u>Limit</u>	<u>Measured</u>	<u>Period</u>	<u>Remarks</u>	<u>CIWQS</u>
*	28-Feb-11	TSS	mg/L	10	15	Average Monthly	1*	894414
*	28-Feb-11	Chlorodibromomethane	µg/L	0.41	1.6	Average Monthly	2*	894434
*	28-Feb-11	Dichlorobromomethane	µg/L	0.56	1.9	Average Monthly	2*	894416
1	10-Mar-11	TSS	mg/L	20	21	Maximum Daily	4	902090
2	14-Mar-11	TSS	mg/L	15	21	Average Weekly	1	902094
3	17-Mar-11	TSS	mg/L	20	52	Maximum Daily	1	902097
4	21-Mar-11	TSS	mg/L	15	52	Average Weekly	1	902100
5	24-Mar-11	TSS	mg/L	20	24	Maximum Daily	4	902102
6	28-Mar-11	BOD	mg/L	15	16	Average Weekly	4	902104
7	28-Mar-11	TSS	mg/L	15	24	Average Weekly	1	902107
8	31-Mar-11	TSS	mg/L	10	24	Average Monthly	1	902110
9	31-Mar-11	BOD	mg/L	10	11	Average Monthly	4	902112
10	31-Mar-11	Chlorodibromomethane	µg/L	0.41	6.5	Average Monthly	2	902114
11	31-Mar-11	Dichlorobromomethane	µg/L	0.56	8.4	Average Monthly	2	902115
12	14-Apr-11	TSS	mg/L	20	32	Maximum Daily	1	902116
13	16-Apr-11	BOD	mg/L	15	16	Average Weekly	4	902120
14	16-Apr-11	TSS	mg/L	15	32	Average Weekly	1	902126
15	21-Apr-11	TSS	mg/L	20	40	Maximum Daily	1	902128
16	21-Apr-11	TSS	lbs/day	83	115.49	Maximum Daily	4	902129
17	21-Apr-11	BOD	mg/L	20	21	Maximum Daily	4	902130
18	23-Apr-11	TSS	mg/L	15	40	Average Weekly	1	902131
19	23-Apr-11	BOD	mg/L	15	21	Average Weekly	1	902133
20	28-Apr-11	TSS	mg/L	20	48	Maximum Daily	1	902134
21	28-Apr-11	BOD	mg/L	20	26	Maximum Daily	4	902136
22	30-Apr-11	TSS	mg/L	15	48	Average Weekly	1	902137
23	30-Apr-11	BOD	mg/L	15	26	Average Weekly	1	902139
24	30-Apr-11	TSS	mg/L	10	33.25	Average Monthly	1	902141
25	30-Apr-11	BOD	mg/L	10	19	Average Monthly	1	902143
26	5-May-11	TSS	mg/L	20	28	Maximum Daily	1	904766
27	7-May-11	TSS	mg/L	15	28	Average Weekly	1	904768
28	11-May-11	Dichlorobromomethane	µg/L	1.12	1.5	Maximum Daily	2	904770
29	12-May-11	TSS	mg/L	20	40	Maximum Daily	1	904771
30	14-May-11	TSS	mg/L	15	40	Average Weekly	1	904773
31	14-May-11	BOD	mg/L	15	16	Average Weekly	4	904775
32	19-May-11	TSS	mg/L	20	30	Maximum Daily	1	904776
33	21-May-11	TSS	mg/L	15	30	Average Weekly	1	904779
34	21-May-11	BOD	mg/L	15	17	Average Weekly	4	904781

	<u>Date</u>	<u>Violation</u>	<u>Units</u>	<u>Limit</u>	<u>Measured</u>	<u>Period</u>	<u>Remarks</u>	<u>CIWQS</u>
35	25-May-11	Total Coliform	MPN/100mL	2.2	4	7-Day Median	4	904783
36	25-May-11	Total Coliform	MPN/100mL	23	30	>1 in 30 Days	4	904784
37	26-May-11	TSS	mg/L	20	73	Maximum Daily	1	904785
38	26-May-11	Total Coliform	MPN/100mL	2.2	4	7-Day Median	4	904787
39	27-May-11	Total Coliform	MPN/100mL	2.2	4	7-Day Median	4	904788
40	28-May-11	TSS	mg/L	15	73	Average Weekly	1	904789
41	28-May-11	BOD	mg/L	15	17	Average Weekly	4	904791
42	31-May-11	Total Coliform	MPN/100mL	2.2	4	7-Day Median	4	904793
43	31-May-11	TSS	mg/L	10	43	Average Monthly	1	904794
44	31-May-11	BOD	mg/L	10	16	Average Monthly	1	904796
45	31-May-11	Dichlorobromomethane	µg/L	0.56	1.5	Average Monthly	2	904798
46	1-Jun-11	Chlorodibromomethane	µg/L	0.82	24	Maximum Daily	2	905981
47	1-Jun-11	Dichlorobromomethane	µg/L	1.12	16	Maximum Daily	2	905987
48	1-Jun-11	Total Coliform	MPN/100mL	2.2	4	7-day median	4	905969
49	2-Jun-11	Total Coliform	MPN/100mL	2.2	4	7-day median	4	905970
50	4-Jun-11	BOD	mg/L	15	17	Average Weekly	4	905967
51	4-Jun-11	TSS	mg/L	15	18	Average Weekly	2	905942
52	7-Jun-11	Total Coliform	MPN/100mL	2.2	8	7-day median	4	905971
53	8-Jun-11	Total Coliform	MPN/100mL	2.2	8	7-day median	4	905972
54	9-Jun-11	Total Coliform	MPN/100mL	2.2	4	7-day median	4	905973
55	9-Jun-11	TSS	mg/L	20	22	Maximum Daily	4	905960
56	11-Jun-11	TSS	mg/L	15	22	Average Weekly	2	905961
57	14-Jun-11	Total Coliform	MPN/100mL	2.2	8	7-day median	4	905974
58	15-Jun-11	Total Coliform	MPN/100mL	2.2	8	7-day median	4	905975
59	16-Jun-11	Total Coliform	MPN/100mL	2.2	8	7-day median	4	905977
60	18-Jun-11	TSS	mg/L	15	18	Average Weekly	2	905962
<i>Violations occurring after compliance project and 90-day start-up period</i>								
61	20-Sep-11	Total Coliform	MPN/100mL	2.2	4	7-day median	4	914193
62	21-Sep-11	Total Coliform	MPN/100mL	2.2	4	7-day median	4	914195
63	16-Nov-11	Total Coliform	MPN/100mL	2.2	4	7-day median	4	917512
64	17-Nov-11	Total Coliform	MPN/100mL	2.2	4	7-day median	4	917513
65	21-Nov-11	Total Coliform	MPN/100mL	2.2	4	7-day median	4	917514
66	22-Nov-11	Total Coliform	MPN/100mL	2.2	7	7-day median	4	917515
67	23-Nov-11	Total Coliform	MPN/100mL	2.2	7	7-day median	4	917516
68	28-Nov-11	Total Coliform	MPN/100mL	2.2	11	7-day median	4	917517
69	29-Nov-11	Total Coliform	MPN/100mL	2.2	7	7-day median	4	917518
70	30-Nov-11	Total Coliform	MPN/100mL	2.2	11	7-day median	4	917519
71	1-Dec-11	Total Coliform	MPN/100mL	2.2	11	7-day median	4	918887
72	5-Dec-11	Total Coliform	MPN/100mL	2.2	8	7-day median	4	918888
73	12-Dec-11	Total Coliform	MPN/100mL	2.2	4	7-day median	4	918889
74	13-Dec-11	Total Coliform	MPN/100mL	2.2	4	7-day median	4	918890

Remarks:

1. Serious Violation: For Group I pollutants that exceed the effluent limitation by 40 percent or more.
2. Serious Violation: For Group II pollutants that exceed the effluent limitation by 20 percent or more.
3. Non-serious violation falls within the first three violations in a six-month period, thus is not subject to mandatory minimum penalties.
4. Non-serious violation subject to mandatory minimum penalties.

<b><u>VIOLATIONS AS OF:</u></b>	<b><u>3/31/12</u></b>
Group I Serious Violations:	25
Group II Serious Violations:	9
Non-Serious Violations Not Subject to MMPs:	0
Non-serious Violations Subject to MMPs:	40
<b><u>Total Violations Subject to MMPs:</u></b>	<b><u>74</u></b>

**Mandatory Minimum Penalty = (34 Serious Violations + 40 Non-Serious Violations) x \$3,000 = \$222,000**

\* in ACL Supporting Violations addressed Order R5-2011-0582