

Item 13 – Late Addition

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
LAHONTAN REGION
MEETING OF JUNE 10-11, 2015
BISHOP**

EXECUTIVE OFFICER'S REPORT

Please insert the attached Quarterly Violations Memorandum at Bates page 13-26.

Lahontan Regional Water Quality Control Board

M E M O R A N D U M

TO: LAHONTAN WATER BOARD MEMBERS



FROM: LAURI KEMPER
ASSISTANT EXECUTIVE OFFICER
LAHONTAN REGIONAL WATER QUALITY CONTROL BOARD

DATE: June 4, 2015

SUBJECT: QUARTERLY VIOLATIONS REPORT, 1ST QUARTER 2015

Attached is the Quarterly Violations Report for January 1, 2015 – March 31, 2015 (1st Quarter 2015). I have included in this memo with the Quarterly Violations Report (1) a Synopsis of 1st Quarter Violations; and (2) a Table of Pending Formal Enforcement Cases.

Synopsis of 1st Quarter 2015 Violations

There were 76 violations entered into the CIWQS and SMARTS databases for the 1st Quarter 2015, compared to the 75 violations entered for the previous quarter. Approximately 40 percent of the violations were associated with two facilities with the remaining violations distributed across multiple facilities. There were no Priority 1 violations this quarter. There were sixty-six (66) Priority 2 violations, of which 16 were related to flow exceedances at Death Valley National Park's Furnace Creek Wastewater Treatment Facility (Furnace Creek Facility), and 16 other violations were related to Victor Valley Wastewater Reclamation Authority's Wastewater Treatment Facility (VWRA Facility).

The Furnace Creek Facility violations are due to a new waste stream from the National Park's drinking water reverse osmosis (RO) system. The Discharger is evaluating the option of using the RO waste stream for irrigation. Water Board staff has provided direction to the Discharger regarding waste characterization. Staff will use such data to determine if irrigating with the RO waste stream is appropriate.

Of the 16 VWRWA-related violations, 11 of them were exceedances of NPDES effluent limitations [total nitrogen (4), ammonia (5), biological oxygen demand (1), and total coliform (1)]. All but one of the total nitrogen and ammonia violations complied with

KIMBERLY COX, CHAIR | PATTY Z. KOUYOUMDJIAN, EXECUTIVE OFFICER

interim effluent limitations established by an existing Water Board Time Schedule Order, and are therefore, exempt from mandatory minimum penalties (MMPs). Water Board staff is evaluating if the other three effluent-related violations are subject to MMPs.

Molycorp accounted for four (4) of the Priority 2 violations in this report. Water Board staff continues to evaluate Molycorp’s performance since issuing a comprehensive Notice of Violation in early 2013. Staff has identified that the 204 Thickener Unit is the source for a number of unauthorized discharges. Staff will work with Molycorp to determine if there are gaps in the spill prevention plans submitted in response to the Notice of Violation. Staff will continue to work with Molycorp to reduce the number of discharges and update operations, maintenance, and training plans as necessary.

There were ten (10) Priority 3 violations, the majority of which were associated with late self-monitoring reports.

Table of Pending Formal Enforcement Cases

Facility	Alleged Violations Summary	Schedule Action (Quarter/Year)
Susanville CSD WWTP – Susanville, Lassen Co.	Exceeding effluent limitations; subject to MMPs	2 nd Quarter, 2015
Dutch Dairy – Helendale, San Bernardino Co.	Nitrate pollution in groundwater	2 nd Quarter, 2015
B & E Dairy – Barstow, San Bernardino Co.	Elevated nitrates in groundwater	2 nd Quarter, 2015
California Dept. of Fish and Wildlife – Hot Creek Hatchery	Exceeding effluent limitations subject to MMPs	2 nd Quarter, 2015
California Dept. of Fish and Wildlife – Fish Springs Hatchery	Exceeding effluent limitations subject to MMPs	2 nd Quarter, 2015
LADWP	Lee Vining Creek Diversion Structure Settlement	June 2015
Pacific Gas and Electric – Hinkley Compressor Station, San Bernardino Co.	Ongoing chromium groundwater contamination	3 rd Quarter, 2015

Attachment: 1st Quarter 2015 Quarterly Violations Report