

California Environmental Protection Agency



ENFORCEMENT REPORT

[Per California Water Code Chapter 5.5 Section 13385(o)]

January 2008 (Data updated April 2008)

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State Water Boards Enforcement Report [Per California Water Code Chapter 5.5 Section 13385(o)]

This State Water Boards report provides the information directed by Chapter 5.5 Section 13385(o) of the California Water Code, responding to the following provision:

13385 Civil Liability (o): The state board shall continuously report and update information on its Web site, but at a minimum, annually on or before January 1, regarding its enforcement activities. The information shall include all of the following:

(A) A compilation of the number of violations of waste discharge requirements in the previous calendar year, including stormwater enforcement violations.

(B) A record of the formal and informal compliance and enforcement actions taken for each violation, including stormwater enforcement actions

(C) An analysis of the effectiveness of current enforcement policies, including mandatory minimum penalties.

As directed by this statute, the report is available at the Water Board's website at <u>http://www.waterboards.ca.gov</u>.

Executive Summary

This report summarizes information regarding violations of waste discharge requirements and enforcement actions taken by the Regional Water Quality Control Boards (Regional Water Boards) in response to those violations. The report addresses only discharges to surface water because it has been prepared pursuant to Chapter 5.5 of the California Water Code. Chapter 5.5 implements provisions of the Federal Water Pollution Control Act and establishes a regulatory program for discharges to surface water only. This report also contains analysis of program effectiveness and recommendations for improvement.

In addition, The State Water Resources Control Board and the Regional Water Boards (collectively Water Boards) are currently developing a Baseline Enforcement Report for all core regulatory programs. This more comprehensive report will look at violations, enforcement actions, staffing, proposed enforcement performance measures, and recommendations for program effectiveness. The Baseline Enforcement Report will also address the additional enforcement reporting requirements in California Water Code Section 13225 (as amended by Senate Bill no. 729 (2005-2006 Regular Session)).

The Water Boards use the California Integrated Water Quality System (CIWQS) database to track violations and the resulting enforcement actions. The CIWQS

database contains information on violations and enforcement actions that have occurred since July 1, 1999.

Most of the tables presented in this report are now available for continuous public use via the State Water Board's Internet site. Use of live, public reports allows the public access to violation and enforcement data from all dischargers regulated by the Water Boards, and gives the user control over how to sort and filter this data to meet specific information needs.

The Water Board's currently available public reports can be found on the Water Board's public website at:

http://www.waterboards.ca.gov/ciwqs/publicreports.html

The major findings of this report are:

- (1) The Water Boards regulate over 2,000 National Pollutant Discharge Elimination System (NPDES) wastewater permittees, and nearly 30,000 stormwater permittees statewide.
- (2) The <u>total</u> number of violations at NPDES wastewater facilities and the number of <u>effluent</u> violations has fluctuated since 2000 with no overall trends up or down.
- (3) The percentage of violations with a completed enforcement action has declined during the past four years (some of these violations may not warrant enforcement).
- (4) A backlog of mandatory minimum penalties (MMPs) exists, representing a substantial pending workload.
- (5) Transition to a new data system in mid-2005 has affected collection and reporting of data on violations and enforcement actions.

These findings are based on analysis of the data from the CIWQS database as presented in this report.

The Water Boards are undertaking the following actions to address the findings in this report:

- (a) Standardization for efficient processing of permits and MMPs; return saved resources to compliance work,
- (b) Continued development of electronic submittal of compliance information from dischargers to provide dischargers and state staff greater efficiencies and enable more state resources to be devoted to compliance,
- (c) Continue work on improved public reporting of violation and enforcement information, including development and public reporting of enforcement performance measures on the Internet,
- (d) Explore improved prioritization of enforcement efforts,
- (e) Issuance of an annual enforcement report covering all Water Board programs (the Baseline Enforcement Report referenced earlier),
- (f) Assess compliance at federal facilities and discuss findings and appropriate next steps with USEPA.

Introduction

This report addresses violations of Waste Discharge Requirements for discharges to surface water. Discharges to surface water are issued a combined Waste Discharge Requirements/NPDES permit. The NPDES program is administered by California in accordance with the United States Environmental Protection Agency's approval, and is implemented through Chapter 5.5 of the California Water Code. NPDES Waste Discharge Requirements are usually issued by one of the nine Regional Water Boards. These nine Regional Water Boards and their twelve regional offices lie within different watersheds and are as follows (see Appendix A for map and details):

- Region 1 North Coast Water Board
- Region 2 San Francisco Bay Water Board
- Region 3 Central Coast Water Board
- Region 4 Los Angeles Water Board
- Region 5 Central Valley Water Board (With Offices in Redding [5R], Sacramento [5S] and Fresno [5F])
- Region 6 Lahontan Water Board (With offices in South Lake Tahoe [6A] and Victorville [6B])
- Region 7 Colorado River Basin Water Board
- Region 8 Santa Ana Water Board
- Region 9 San Diego Water Board

Three overarching considerations are pertinent to this report: the reporting period, federal facilities, small and disadvantaged communities, and data quality.

Reporting Period

This report addresses violations and enforcement actions recorded in CIWQS for calendar year 2007. Additionally, historical information for prior years is included for comparison purposes. Typically, it takes approximately six months to issue an enforcement action after the violation has occurred; it may take substantially longer for more complex cases, or where staff has been assigned to higher priorities. Also, self-monitoring reports are typically due to the Regional Water Boards 30 to 45 days after the end of the month for which the monitoring was done. This allows time for laboratory analysis and transmittal of data. As a result, Regional Water Board staff is not routinely aware of violations for several months after they occur. Staff must review the reports, identify the violations and manually enter the information into the data system. Where a large enforcement action is warranted to address a minor but chronic problem, it could be several years before a specific violation is linked in the database to a specific enforcement action.

The required reporting date for this report is January 1 for reporting on the preceding calendar year. As noted above it may be several months or more before violations are noted and enforcement actions taken. The data in this report reflects this lag. In particular, data for 2007 in the following tables and charts is incomplete due to this reporting, review and recording lag.

It is important to note that the data presented in these reports continues to change as actions are taken and enforcement information is updated to reflect these actions. For example, in a report issued in August 2006 for data in 2005, the Regional Water Boards reported that only 14% of certain violations had resulted in an enforcement action. Data now indicate that 53% of these violations have resulted in an enforcement action.

Data for this report was initially extracted from the CIWQS database on December 3-7, 2007, and was updated March 21-28, 2008. This data has been updated to include final quarter data for 2007 and to reflect substantial data cleanup efforts by the Regional Water Boards.

Federal Facilities

Federal facilities include any facilities owned or operated by the federal government. These include national parks, Department of Energy facilities, Department of the Defense (DOD) facilities, etc.

DOD facilities fall under one of the following three categories:

- Active bases where the military currently conducts operations,
- Base Realignment and Closure (BRAC) installations which are being cleaned up and prepared for transfer to communities and to other federal, state, and local agencies, and
- Formerly Used Defense Sites (FUDS) which are properties that DOD once owned, operated or leased.

State regulatory oversight is conducted at DOD facilities under a Cooperative Agreement (CA) between the State regulatory agencies (the Water Boards and the Department of Toxic Substances Control) and DOD. The CA includes a dispute resolution process based on an approach agreed to in a 1992 memorandum of agreement (MOA) between the DOD and the State Water Board. Enforcement actions against DOD facilities must first be negotiated pursuant to the dispute resolution procedures of the MOA. The MOA specifies three levels for dispute resolution, with the final level being the Governor and the Secretary of Defense. The MOA is interpreted by DOD to preclude State enforcement until the dispute resolution process has been fully exhausted without successful resolution. Only if the State and the Federal Government still disagree can the State pursue enforcement for these facilities. This effectively precludes enforcement actions against such facilities. In addition, federal facilities are shielded from most penalty actions by sovereign immunity.

CIWQS database information about federal facilities has become inconsistent and problematic because the Water Boards have found it difficult to prevail in enforcement against federal facilities. Consequently, Regional Water Board entry of violations at these facilities has declined. For example, San Diego Regional Water Board initially entered all identified violations at federal facilities into the database. The San Diego Regional Water Board discontinued this comprehensive recordation of federal facility violations because of their inability to enforce. Inclusion of this data in summary information about violations and related enforcement has a dramatic and misleading impact on the historic data. For that reason, this report does not include violations and enforcement actions for federal facilities. To ensure the Water Boards are properly addressing violations, a separate assessment of such facilities should be done, and the findings discussed with USEPA. It is anticipated that future versions of this report will accurately report on the status of violations and enforcement at federal facilities.

Small and Disadvantaged Communities

Small and disadvantaged communities often face compliance issues related to their wastewater management systems. The Water Boards' challenge is to determine the proper mix of formal enforcement actions with other compliance measures such as financial, technical, and regulatory assistance to effectively address the water quality violations at facilities in these communities.

In California, small communities are generally defined as those communities with either: (1) less than 10,000 persons or within a rural county for wastewater enforcement purposes; or (2) less than 20,000 persons for financial assistance purposes. Due to their small rate base, small communities lack the economies of scale to build and maintain adequate wastewater systems. Small communities are commonly located in rural, sparsely-populated areas that require greater pipeline and pumping infrastructure. In addition, many small and/or rural communities are also disadvantaged (have an average household income of less than 80 percent of the statewide average).

Many small communities are currently on failing septic systems or have old and undersized wastewater treatment plants that can not meet current water quality standards. Such systems can cause significant health and safety problems, endanger surface water uses, and pose a threat to groundwater supplies. Small communities may lack the funds necessary to retain qualified operators. When their wastewater systems violate water quality requirements, they may be unable to come up with the capital to fix the problem or to pay the fines associated with non-compliance. In addition, many small disadvantaged communities lack the knowledge and resources necessary to effectively apply for grants and loans to help make wastewater projects more feasible. Even if communities are able to secure financial assistance, they often do not have the technical knowledge to determine the best project alternative or to appropriately plan for long-term operations and maintenance needs.

The Water Boards have formed a staff work group to learn more about the problems faced by small disadvantaged communities and to develop strategies to address those problems. In addition to these internal efforts, Water Board staff also have met with community-based nonprofit organizations to gain a better understanding of the current needs and issues of small and/or disadvantaged communities. These nonprofit organizations support small, rural, and disadvantaged communities with water and wastewater resource policy, planning, and management.

The staff working group will develop a *Small Community Wastewater Strategy* for public review and comment and consideration by the State Water Board. One of the strategies addressed will be the use of formal enforcement actions to deter non-compliance. It is anticipated that the *Water Boards' Small Community Wastewater*

Strategy will be an evolving strategy that will be re-evaluated and updated on an annual basis to incorporate new information and address emerging small community needs.

Data Quality

Data quality and completeness present an ongoing challenge, and data entry is inconsistent between Regional Water Boards and has been delayed in some. The primary reasons for these difficulties are the resource intensive manual review of paper monitoring reports and the subsequent manual data entry of violations, adjustment to a new data system, and the required reporting date for this report as noted above.

In July 2005, the Water Boards launched a new data system called the California Integrated Water Quality System (CIWQS). Initial deployment of this system occurred before the system was fully ready. Development of reporting functionality, development of business rules, and data migration continues. As such, inconsistencies and apparent deficiencies in the data presented in this report do not necessarily reflect inconsistencies in our enforcement program statewide. To address the question of data quality and the functioning of CIWQS, the State Water Board asked an independent panel of national experts to review CIWQS. This review was conducted in May 2006 and the review panel report had seven recommendations for improving CIWQS. The State Water Board has deployed a dedicated project team to implement the review panel's recommendations and improve the functioning of CIWQS. One of the projects undertaken is a QA/QC review to assess the quality of data in CIWQS by coordinating a data audit and establishing QA/QC protocols to assure that the quality of data remains high into the future. This CIWQS improvement effort is ongoing and should result in ongoing incremental improvement to the accuracy and timeliness of the violation and enforcement data in CIWQS.

The Water Boards have also recently developed a number of new public reports to meet our requirement to continuously provide the data contained in this report. The violation and enforcement reports now available at:

http://www.waterboards.ca.gov/ciwqs/publicreports.html include the following:

- Interactive violation report by Regional Water Board or county
- Violations by year and Regional Water Board for 2000 thru 2007
- Interactive violations with linked enforcement actions
- Violations with linked enforcement actions by Regional Water Board for the years 2000 through 2007
- Enforcement actions listing
- Enforcement orders search of actual existing orders documents
- Mandatory minimum penalty report
- Facilities-at-a-glance report that displays inspection, violation, and enforcement actions history for regulated facilities
- Sanitary sewer overflow reports of spills reported online

Additionally, functionality being developed in CIWQS promises to move us well beyond where we were in terms of data quality, data entry and management, and public access to information on compliance. One of the key elements of this is electronic submittal of monitoring reports, and direct entry of violation information by dischargers. This is essentially taking the paper-based reporting process used now and having the dischargers provide this information online. We anticipate that as this functionality is implemented for all our NPDES Permits, the quality and completeness of routine compliance monitoring data will improve dramatically.

(A) A compilation of the number of violations of waste discharge requirements in the previous year.

<u>Wastewater</u>

Wastewater facilities discussed in this report are those facilities that are permitted to discharge pollutants to surface waters and include sewage treatment plants, food processors, oil refineries, power plant cooling waters, pulp and paper mills, mining operations, fish hatcheries, etc. During the reporting period, there were 2,098 active wastewater facilities regulated by NPDES waste discharge requirements in California. These facilities are divided into two categories:

- <u>Major facilities</u> Facilities with an average daily discharge greater than 1 million gallons per day or those that pose a high degree of threat to water quality;
- <u>Minor facilities</u> Facilities with an average daily flow less than 1 million gallons per day and that have a lower threat to water quality.

The waste discharge requirements (hereinafter "NPDES permits" or "permits") are issued as individual permits or as general permits. Dischargers who are eligible for coverage under a general permit must enroll and agree to comply with the conditions of the general permit.

A summary of active NPDES facilities by category and Regional Water Board is shown in Table 1.

| Regional Office | MAJOR FACILITIES | Mi | NOR FACILITIES | | |
|--------------------|--------------------|-----------------------------|-----------------------|-------------|-------|
| | INDIVIDUAL Permits | GENERAL Permit Enrollees | INDIVIDUAL Permits | Total Minor | Total |
| 1 | 16 | 21 | 29 | 50 | 66 |
| 2 | 64 | 209 | 33 | 242 | 306 |
| 3 | 22 | 67 | 22 | 89 | 111 |
| 4 | 51 | 520 | 84 | 604 | 655 |
| 5F | 5 | 26 | 31 | 57 | 62 |
| 5R | 13 | 15 | 52 | 67 | 80 |
| 5S | 39 | 131 | 58 | 189 | 228 |
| 6A | 1 | 12 | 4 | 16 | 17 |
| 6B | 2 | 5 | 7 | 12 | 14 |
| 7 | 8 | 36 | 15 | 51 | 59 |
| 8 | 18 | 350 | 20 | 370 | 388 |
| 9 | 20 | 67 | 25 | 92 | 112 |
| Total | 259 | 1,459 | 380 | 1,839 | 2,098 |

Table 1: NPDES Wastewater Permits by Category and Regional Office

Table 2 lists the total number of violations of NPDES permits by Regional Water Board office for each of the past five years. The table shows a generally consistent number of violations statewide though this does not track for all the Regional Water Board offices. The increase in the number of violations in 2003 and 2004 is in part explained by an increased diligence in recording violations, particularly mandatory minimum penalty violations. As noted elsewhere in this report, deployment of the CIWQS database in

mid-2005 resulted in a drop in data entry, though some Regional Water Board offices maintained consistency in data entry.

| | Violations of NPDES Waste Discharge Requirements | | | | | | | | | | | | |
|--------------------|--|-------|-------|-------|-------|-------|-------|-------|--|--|--|--|--|
| Regional Office | 2000 | 2001 | 2002 | 2003 | 2004 | 2005 | 2006 | 2007 | | | | | |
| 1 | 942 | 660 | 424 | 464 | 650 | 270 | 209 | 114 | | | | | |
| 2 | 459 | 486 | 295 | 257 | 273 | 294 | 328 | 162 | | | | | |
| 3 | 348 | 387 | 305 | 211 | 408 | 411 | 417 | 416 | | | | | |
| 4 | 2,075 | 2,334 | 2,442 | 2,866 | 2,537 | 2,048 | 2,788 | 1,273 | | | | | |
| 5F | 222 | 446 | 698 | 551 | 285 | 142 | 52 | 112 | | | | | |
| 5R | 202 | 89 | 101 | 74 | 51 | 107 | 77 | 29 | | | | | |
| 5S | 1,094 | 794 | 755 | 956 | 1,684 | 1,791 | 671 | 63 | | | | | |
| 6A | 10 | 11 | 20 | 11 | 9 | 7 | 1 | 4 | | | | | |
| 6B | 4 | 10 | 21 | 25 | 23 | 14 | 118 | 21 | | | | | |
| 7 | 128 | 187 | 198 | 317 | 166 | 191 | 272 | 198 | | | | | |
| 8 | 454 | 313 | 193 | 129 | 185 | 233 | 142 | 70 | | | | | |
| 9 | 245 | 217 | 150 | 218 | 545 | 127 | 205 | 459 | | | | | |
| Total | 6,183 | 5,934 | 5,602 | 6,079 | 6,816 | 5,635 | 5,280 | 2,921 | | | | | |

A comparison of the number of violations by Regional Water Board and the number of facilities regulated in that Regional Water Board is provided in Table 3. A comparison of the average number of violations per facility assists in recognizing Water Boards or facilities that have above-average and below-average compliance rates.

| Number of Facil | ities Compared to Numbe | er of NPDES Violations C | alendar Year 2007 |
|-----------------|-------------------------|--------------------------|-------------------------|
| Regional Office | NPDES Facilities | Total Violations | Violations per facility |
| 1 | 66 | 114 | 1.73 |
| 2 | 306 | 162 | 0.53 |
| 3 | 111 | 416 | 3.75 |
| 4 | 655 | 1,273 | 1.94 |
| 5F | 62 | 112 | 1.81 |
| 5R | 80 | 29 | 0.36 |
| 5S | 228 | 63 | 0.28 |
| 6A | 17 | 4 | 0.24 |
| 6B | 14 | 21 | 1.50 |
| 7 | 59 | 198 | 3.36 |
| 8 | 388 | 70 | 0.18 |
| 9 | 112 | 459 | 4.10 |
| Total | 2,098 | 2,921 | Average: 1.65 |

 Table 3: Number of Violations per Wastewater Facility for 2007

The data indicate an uneven distribution of the average number of violations per facility among the different Regional Water Board offices. The reasons for this variability include differences in facility-specific requirements, differences in Regional Water Board office processes and priority assigned to report review and data entry, and differences in rates of compliance among dischargers. As noted above, the data for 2007 is incomplete due to the fact that not all monitoring

reports for 2007 have been received and reviewed, and not all violations have been recorded by staff. Variability due to report review and data entry should be reduced with the electronic submittal being implemented through our improved data system. Recent efforts to standardize permit terms will reduce the differences in facility specific requirements over the next few years as permits are renewed.

A breakdown of the violation types and the number of those violations that are identified as priority violations is presented in Table 4. A more detailed description of each violation category is provided in Appendix B. Violations vary from not submitting monitoring reports on time to acute toxicity violations. The Water Boards identify priority violations based on criteria identified in the Water Quality Enforcement Policy (Resolution No. 2002-0040) (<u>http://www.waterboards.ca.gov/plnspols/docs/wqep.doc</u>). A priority violation represents a greater threat to water quality than other violations. 24 percent of NPDES wastewater violations have been identified as priority violations.

It is important to note that the term "priority" violation used in this context is different than "serious" violations discussed in the following section on mandatory minimum penalties. The term "serious" violation is defined in sections 13385(h) and 13385.1 of the Water Code. All "serious" violations are considered priority violations, but not all priority violations are "serious" violations.

| Breakdown of the Nun | Breakdown of the Number of NPDES Violations by Category for 2007 | | | | | | | | | | |
|---|--|----------|---------------------|------------------------|--------------------------|--|--|--|--|--|--|
| Departmention of Violation Cotonomy | Total Vic | olations | Priority Violations | | | | | | | | |
| Description of Violation Category (See Appendix B) | Number | % | Number | % of Total Priority | % of Total Violations | | | | | | |
| Category 1 Pollutant | 877 | 29% | 289 | 40% | 10% | | | | | | |
| Reporting | 733 | 25% | 126 | 17% | 4% | | | | | | |
| Effluent | 631 | 21% | 27 | 4% | 1% | | | | | | |
| Category 2 Pollutant | 311 | 10% | 251 | 35% | 8% | | | | | | |
| Receiving Water | 143 | 5% | 19 | 3% | 1% | | | | | | |
| Monitoring | 118 | 4% | 1 | 0% | 0% | | | | | | |
| Violation of Non-Effluent Permit Condition | 53 | 2% | 1 | 0% | 0% | | | | | | |
| Sanitary Sewer Overflow | 46 | 2% | 5 | 1% | 0% | | | | | | |
| Acute Toxicity | 22 | 1% | 4 | 1% | 0% | | | | | | |
| Chronic Toxicity | 20 | 1% | 3 | 0% | 0% | | | | | | |
| Failure to Obtain Permit | 14 | 0% | 0 | 0% | 0% | | | | | | |
| Unauthorized Discharge | 11 | 0% | 0 | 0% | 0% | | | | | | |
| Other Requirement | 5 | 0% | 0 | 0% | 0% | | | | | | |
| Groundwater | 3 | 0% | 0 | 0% | 0% | | | | | | |
| Total | 2,987 | | 726 | | 24% | | | | | | |

Table 4: NPDES Wastewater Violations by Category for 2007

NPDES Stormwater

The Stormwater Program encompasses five categories of dischargers subject to the Federal Stormwater permit requirements. At the time of report preparation, nearly 30,000 facilities or permittees are regulated by NPDES stormwater permits in California. Below is a brief description of each of the five categories:

- <u>Industrial Activities</u> The Industrial Storm Water General Permit Order 97-03-DWQ (<u>General Industrial Permit</u>) is an NPDES permit that regulates discharges associated with 10 broad categories of industrial activities other than construction. In general, discharges from manufacturing, transportation, and recycling facilities are subject to this permit.
- Construction Activities Dischargers whose projects disturb one or more acres of soil or are part of a larger common plan of development or sale are required to obtain coverage under the General Permit for Discharges of Storm Water Associated with Construction Activity (Construction General Permit CGP Order No. 99-08-DWQ). Construction activity subject to this permit includes clearing, grading and disturbances to the ground such as stockpiling, or excavation, but does not include regular maintenance activities performed to restore the original line, grade or capacity of the facility. Typical CGP permit coverage lasts about 1 year, so this permit program sees a lot of turnover. As construction activities are temporary and the most prevalent pollutant problem is sediment discharges, the State Water Board has adopted this permit separate from the General Industrial Permit, similar to the approach taken by USEPA.
- <u>Linear Stormwater Facilities</u> –Underground/Overhead Projects disturbing at least 1 acre but less than 5 acres (including trenching and staging areas) are covered by the Statewide General Permit for Storm Water Discharges Associated with Construction Activity from Small Linear Underground/Overhead Projects (<u>Small</u> <u>LUP General Permit</u>)
- <u>Municipal Stormwater Phase I Facilities</u> The Municipal Storm Water Permits regulate storm water discharges from municipal separate storm sewer systems (MS4s). Under <u>Phase I</u>, which started in 1990, the Regional Water Boards have issued NPDES MS4 permits to permittees serving populations greater than 100,000 people. Many of these permits are issued to a group of co-permittees encompassing an entire metropolitan area.
- <u>Municipal Stormwater Phase II Facilities</u> Under <u>Phase II</u>, the SWRCB adopted a General Permit for the Discharge of Storm Water from Small MS4s (WQ Order No. 2003-0005-DWQ) to provide permit coverage for smaller municipalities (10,000 to 100,000 people), including non-traditional Small MS4s which are governmental facilities such as military bases, public campuses, and prison and hospital complexes.

Stormwater permits are generally issued as individual permits to the Phase 1 MS4s and as general permits to the other categories. Dischargers who are eligible for coverage under a general permit must enroll and agree to comply with the conditions of the general permit.

The Water Boards currently implement the storm water program. The program is supported by fees collected from permittees. The current program expends about \$12 million per year and supports about 100 staff at the Water Boards.

The current level of program staffing resources is not sufficient to fully implement the storm water program. Full implementation would generally include at least one inspection at each facility, full review of stormwater pollution prevention plans (SWPPPs) and annual reports, appropriate follow-up and enforcement of permit violators, and comprehensive identification and enforcement of non-filers. In a previous report that was submitted to the Legislature, the State Water Board estimated that the Phase I program would need 199 staff to implement and an additional 112 staff to implement the Phase II program. This estimate was based upon a needs analysis conducted by the State Water Board for its core regulatory programs as required by Supplemental Language to the 1999/2000 State Budget. Since the completion of the needs analysis, additional resources are needed in response to recent Appellate Court decisions and an increased permit enrollment of 20%.

A summary of active NPDES stormwater facilities by category and Regional Water Board is shown in Table 5.

| Regional Office | Construction | onstruction Industrial Linear Municipal Phase I** | | | | | Municipal Phase II** | Total |
|--------------------|--------------|---|----|-----|-----|--------|-------------------------|-------|
| 1 | 449 | 352 | 1 | 7 | 12 | 821 | | |
| 2 | 1,761 | 1,370 | 15 | 77 | 33 | 3,256 | | |
| 3 | 797 | 397 | 4 | 3 | 15 | 1,216 | | |
| 4 | 2,806 | 2,908 | 11 | 103 | 0 | 5,828 | | |
| 5F | 1,367 | 551 | 6 | 8 | 1 | 1,933 | | |
| 5R | 498 | 188 | 3 | 3 | 6 | 698 | | |
| 5S | 3,347 | 1,162 | 13 | 21 | 41 | 4,584 | | |
| 6A | 145 | 37 | 3 | 4 | 0 | 189 | | |
| 6B | 972 | 168 | 4 | 1 | 4 | 1149 | | |
| 7 | 738 | 171 | 2 | 13 | 0 | 924 | | |
| 8 | 3475 | 1,563 | 9 | 71 | 0 | 5,118 | | |
| 9 | 2,751 | 750 | 12 | 76 | 1 | 3,590 | | |
| Fotal | 19,106 | 9,617 | 83 | 387 | 113 | 29,306 | | |

 Table 5: NPDES Stormwater Permittees by Permit Type and Regional Office

Table 6 lists the total number of violations of NPDES stormwater permits by Regional Water Board office for each of the past five years.

| | Violati | Violations of NPDES Stormwater Waste Discharge Requirements | | | | | | | | | | | | |
|--------------------|---------|---|-------|-------|-------|-------|-------|-------|--|--|--|--|--|--|
| Regional Office | 2000 | 2001 | 2002 | 2003 | 2004 | 2005 | 2006 | 2007 | | | | | | |
| 1 | 70 | 63 | 52 | 89 | 10 | 0 | 5 | 80 | | | | | | |
| 2 | 138 | 18 | 104 | 65 | 6 | 6 | 1 | 1 | | | | | | |
| 3 | 19 | 29 | 96 | 30 | 201 | 210 | 57 | 59 | | | | | | |
| 4 | 229 | 1,187 | 1,143 | 717 | 509 | 272 | 197 | 120 | | | | | | |
| 5F | 13 | 5 | 6 | 9 | 104 | 305 | 240 | (| | | | | | |
| 5R | 62 | 21 | 127 | 27 | 153 | 45 | 70 | 59 | | | | | | |
| 5S | 183 | 45 | 57 | 201 | 380 | 459 | 528 | 195 | | | | | | |
| 6A | 23 | 31 | 70 | 51 | 77 | 38 | 61 | ç | | | | | | |
| 6B | 46 | 74 | 15 | 1 | 0 | 1 | 8 | 4 | | | | | | |
| 7 | 48 | 11 | 21 | 0 | 49 | 1 | 0 | 37 | | | | | | |
| 8 | 550 | 737 | 389 | 266 | 270 | 457 | 233 | 398 | | | | | | |
| 9 | 160 | 299 | 594 | 403 | 379 | 169 | 147 | 168 | | | | | | |
| otal | 1,541 | 2,520 | 2,674 | 1,859 | 2,138 | 1,963 | 1,547 | 1,130 | | | | | | |

Table 6: Number of Violations of NPDES Stormwater Permits 2000 to 2007

A breakdown of the storm water violations by violation type is presented in Table 7. 25 percent of NPDES stormwater violations have been identified as priority violations.

| Breakdown of the Number of | NPDES Storm | water Viola | ations by Cate | gory for 2007 | | | |
|---|-------------|-------------|---------------------|------------------------|--------------------------|--|--|
| Department of Violation Cotogony | Total Vio | lations | Priority Violations | | | | |
| Description of Violation Category (See Appendix B) | Number | % | Number | % of Total Priority | % of Total Violations | | |
| Reporting | 673 | 60% | 231 | 82% | 21% | | |
| BMP | 196 | 18% | 33 | 12% | 3% | | |
| Failure to Pay Fees | 111 | 10% | 0 | 0% | 0% | | |
| SWPPP | 52 | 5% | 4 | 1% | 0% | | |
| Violation of Non-Effluent Permit Condition | 32 | 3% | 2 | 1% | 0% | | |
| Unauthorized Discharge | 13 | 1% | 1 | 0% | 0% | | |
| Unregulated Discharge | 13 | 1% | 5 | 2% | 0% | | |
| Failure to Obtain Permit | 5 | 0% | 0 | 0% | 0% | | |
| Effluent | 4 | 0% | 0 | 0% | 0% | | |
| Other Requirement | 4 | 0% | 1 | 0% | 0% | | |
| Monitoring | 3 | 0% | 1 | 0% | 0% | | |
| Enforcement Action | 2 | 0% | 2 | 1% | 0% | | |
| File | 2 | 0% | 0 | 0% | 0% | | |
| Other Codes | 2 | 0% | 0 | 0% | 0% | | |
| Sanitary Sewer Overflow | 2 | 0% | 0 | 0% | 0% | | |
| Basin Plan Prohibition | 1 | 0% | 0 | 0% | 0% | | |
| Fees | 1 | 0% | 1 | 0% | 0% | | |
| Total | 1,116 | | 281 | | 25% | | |

Table 7: NPDES Stormwater Violations by Category for 2007

Most of the violations documented in the stormwater program are reporting violations. Most non-reporting violations in the stormwater program are discovered through site inspections. This situation differs from violations at NPDES wastewater facilities where the majority of discharge violations are found through review of self-monitoring reports submitted by the dischargers themselves. This difference in recorded violations reflects the difference in how NPDES wastewater and stormwater sites are regulated. One major difference is that most wastewater facilities are given individual NPDES permits, while essentially all stormwater facilities are regulated via one of two general NPDES permits. Secondly, the vast majority of effluent limitations in wastewater NPDES permits are numeric, which are self-monitored and self-reported by the discharger. In contrast, stormwater NPDES permits currently contain no numeric effluent limitations and instead rely upon a suite of general narrative effluent limitations, made specific by a plan that is only kept at the site. Compliance determination for these effluent limitations at stormwater facilities therefore depends heavily upon site visits that include specific observations, analysis, and documentation by Water Board staff. Paperwork (i.e., reporting) violations for stormwater facilities are more efficiently detected and confirmed given our staff resources for the stormwater program. Together these factors could explain the preponderance of reporting violations in the stormwater program.

Ensuring compliance with stormwater NPDES permit effluent limitations for the nearly 30,000 permitted stormwater activities requires a large field presence. As noted above, the 2001 needs analysis concluded that staffing levels are below what is needed to fully oversee and inspect these facilities.

(B) A record of the formal and informal compliance and enforcement actions taken for each violation.

Wastewater

Enforcement actions taken as a result of a violation include both informal and formal actions. An informal enforcement action is any enforcement action taken by Water Board staff that is not defined in statute, such as staff letters and notices of violation. Formal enforcement actions are statutorily recognized actions to address a violation or threatened violation such as Cleanup and Abatement Orders. Appendix C describes the enforcement options used by the Water Boards.

 Table 8: NPDES Wastewater Violations Compared to Completed Enforcement

 Actions

| | NPDES Violations Compared to Completed Enforcement Actions | | | | | | | | | | | | | | |
|--------------------|--|----------------------------------|------------------|------------------|----------------------------------|------------------|------------------|----------------------------------|------------------|------------------|----------------------------------|------------------|------------------|----------------------------------|------------------|
| Calendar Year | | 2003 | | | 2004 | | | 2005 2006 | | | | 2007 | | | |
| Regional Office | Total Violations | Without Completed Enforcement | With Enforcement | Total Violations | Without Completed Enforcement | With Enforcement | Total Violations | Without Completed Enforcement | With Enforcement | Total Violations | Without Completed Enforcement | With Enforcement | Total Violations | Without Completed Enforcement | With Enforcement |
| 1 | 464 | 153 | 311 | 650 | 218 | 432 | 270 | 93 | 177 | 209 | 60 | 149 | 114 | 89 | 25 |
| 2 | 257 | 102 | 155 | 273 | 92 | 181 | 294 | 115 | 179 | 328 | 201 | 127 | 162 | 90 | 72 |
| 3 | 211 | 132 | 79 | 408 | 210 | 198 | 411 | 123 | 288 | 417 | 193 | 224 | 416 | 103 | 313 |
| 4 | 2866 | 1158 | 1708 | 2537 | 1695 | 842 | 2048 | 1485 | 563 | 2788 | 2127 | 661 | 1273 | 996 | 277 |
| 5F | 551 | 117 | 434 | 285 | 75 | 210 | 142 | 25 | 117 | 52 | 40 | 12 | 112 | 109 | 3 |
| 5R | 74 | 33 | 41 | 51 | 7 | 44 | 107 | 25 | 82 | 77 | 32 | 45 | 29 | 0 | 29 |
| 5S | 956 | 455 | 501 | 1684 | 766 | 918 | 1791 | 739 | 1052 | 671 | 349 | 322 | 63 | 39 | 24 |
| 6A | 11 | 3 | 8 | 9 | 6 | 3 | 7 | 3 | 4 | 1 | 0 | 1 | 4 | 4 | 0 |
| 6B | 25 | 10 | 15 | 23 | 5 | 18 | 14 | 3 | 11 | 118 | 25 | 93 | 21 | 21 | 0 |
| 7 | 317 | 21 | 296 | 166 | 36 | 130 | 191 | 11 | 180 | 272 | 5 | 267 | 198 | 0 | 198 |
| 8 | 129 | 55 | 74 | 185 | 92 | 93 | 233 | 21 | 212 | 142 | 4 | 138 | 70 | 13 | 57 |
| 9 | 218 | 9 | 209 | 545 | 9 | 536 | 127 | 14 | 113 | 205 | 17 | 188 | 459 | 15 | 444 |
| Total | 6079 | 2248 | 3831 | 6816 | 3211 | 3605 | 5635 | 2657 | 2978 | 5280 | 3053 | 2227 | 2921 | 1479 | 1442 |
| Percentage | | 37% | 63% | | 47% | 53% | | 47% | 53% | | 58% | 42% | | 51% | 49% |

Table 8 shows the number of violations for 2003 to 2007. It also lists the number of violations for which there is no completed enforcement action currently entered in CIWQS (enforcement is still pending for some, but not all, of these violations), and the number of violations that are linked to an enforcement action. The percentages at the bottom show each violation category as a percentage of the total number of violations.

Table 9 shows the percentage of violations linked to an enforcement action. While Water Board authorities for enforcement are significant, resource levels generally preclude enforcement against every violation.

| Table 9: Percentage of NPDES Wastewater Violation | is with a Completed |
|---|---------------------|
| Enforcement Action. | |

| | 20 | 03 | 20 | 04 | 20 | 05 | 20 | 06 | 20 | 07 |
|--------------------|------------|---------------------|------------|---------------------|------------|---------------------|------------|---------------------|------------|---------------------|
| Regional Office | Violations | With Enforcement |
| 1 | 464 | 67% | 650 | 66% | 270 | 66% | 209 | 71% | 114 | 22% |
| 2 | 257 | 60% | 273 | 66% | 294 | 61% | 328 | 39% | 162 | 44% |
| 3 | 211 | 37% | 408 | 49% | 411 | 70% | 417 | 54% | 416 | 75% |
| 4 | 2,866 | 60% | 2,537 | 33% | 2,048 | 27% | 2,788 | 24% | 1,273 | 22% |
| 5F | 551 | 79% | 285 | 74% | 142 | 82% | 52 | 23% | 112 | 3% |
| 5R | 74 | 55% | 51 | 86% | 107 | 77% | 77 | 58% | 29 | 100% |
| 5S | 956 | 52% | 1,684 | 55% | 1,791 | 59% | 671 | 48% | 63 | 38% |
| 6A | 11 | 73% | 9 | 33% | 7 | 57% | 1 | 100% | 4 | 0% |
| 6B | 25 | 60% | 23 | 78% | 14 | 79% | 118 | 79% | 21 | 0% |
| 7 | 317 | 93% | 166 | 78% | 191 | 94% | 272 | 98% | 198 | 100% |
| 8 | 129 | 57% | 185 | 50% | 233 | 91% | 142 | 97% | 70 | 81% |
| 9 | 218 | 96% | 545 | 98% | 127 | 89% | 205 | 92% | 459 | 97% |
| Total | 6,079 | 63% | 6,816 | 53% | 5,635 | 53% | 5,280 | 42% | 2,921 | 49% |

GREENMore than 90% of violations with completed enforcementYELLOWBetween 80% and 90% of violations with completed enforcementREDLess than 80% of violations with completed enforcement

As noted above, there can be a significant lag in the time between discovery and reporting of a violation, and the resulting enforcement actions. This is due to available staffing and the time it takes to pursue enforcement, particularly for complex enforcement cases. Additionally, minor violations may be resolved before enforcement is taken. As a result, the percentage of violations where enforcement has been taken is lower for more recent violations, and tends to increase as time goes by and additional actions are taken for past violations. The higher percentage in 2007 is likely indicative of the fact that not all violations have yet been recorded for 2007.

Stormwater

Table 10 shows the number of stormwater violations for the last five years. It also lists the number of stormwater violations addressed by enforcement actions. The percentages at the bottom show each violation category as a percent of the total number of violations.

| | NPDES Stormwater Violations Compared to Completed Enforcement Actions | | | | | | | | | | | | | | |
|--------------------|---|----------------------------------|------------------|------------------|----------------------------------|------------------|------------------|----------------------------------|------------------|------------------|----------------------------------|------------------|------------------|----------------------------------|------------------|
| Calendar Year | | 2003 | | | 2004 | | | 2005 | | 2006 | | | | 2007 | |
| Regional Office | Total Violations | Without Completed Enforcement | With Enforcement | Total Violations | Without Completed Enforcement | With Enforcement | Total Violations | Without Completed Enforcement | With Enforcement | Total Violations | Without Completed Enforcement | With Enforcement | Total Violations | Without Completed Enforcement | With Enforcement |
| 1 | 89 | 1 | 88 | 10 | 0 | 10 | 0 | 0 | 0 | 5 | 0 | 5 | 80 | 77 | 3 |
| 2 | 65 | 2 | 63 | 6 | 2 | 4 | 6 | 2 | 4 | 1 | 1 | 0 | 1 | 1 | 0 |
| 3 | 30 | 0 | 30 | 201 | 3 | 198 | 210 | 3 | 207 | 57 | 0 | 57 | 59 | 4 | 55 |
| 4 | 717 | 3 | 714 | 509 | 1 | 508 | 272 | 1 | 271 | 197 | 2 | 195 | 120 | 4 | 116 |
| 5F | 9 | 0 | 9 | 104 | 7 | 97 | 305 | 10 | 295 | 240 | 3 | 237 | 0 | 0 | 0 |
| 5R | 27 | 6 | 21 | 153 | 4 | 149 | 45 | 1 | 44 | 70 | 2 | 68 | 59 | 0 | 59 |
| 5S | 201 | 3 | 198 | 380 | 4 | 376 | 459 | 7 | 452 | 528 | 9 | 519 | 195 | 70 | 125 |
| 6A | 51 | 16 | 35 | 77 | 14 | 63 | 38 | 21 | 17 | 61 | 12 | 49 | 9 | 6 | 3 |
| 6B | 1 | 1 | 0 | 0 | 0 | 0 | 1 | 1 | 0 | 8 | 8 | 0 | 4 | 2 | 2 |
| 7 | 0 | 0 | 0 | 49 | 2 | 47 | 1 | 0 | 1 | 0 | 0 | 0 | 37 | 1 | 36 |
| 8 | 266 | 7 | 259 | 270 | 32 | 238 | 457 | 39 | 418 | 233 | 22 | 211 | 398 | 15 | 383 |
| 9 | 403 | 27 | 376 | 379 | 31 | 348 | 169 | 19 | 150 | 147 | 31 | 116 | 168 | 16 | 152 |
| Total | 1,859 | 66 | 1,793 | 2,138 | 100 | 2,038 | 1,963 | 104 | 1,859 | 1,547 | 90 | 1,457 | 1,130 | 196 | 934 |
| Percentage | | 4% | 96% | | 5% | 95% | | 5% | 95% | | 6% | 94% | | 17% | 83% |

 Table 10: NPDES Stormwater Violations Compared to Completed Enforcement

 Actions

Table 10 shows a very high enforcement response rate, much higher than in Table 8 for wastewater reporting. This is due in part to the fact that these violations are often entered into the database at the same time the enforcement action is entered into the database.

(C) An analysis of the effectiveness of current policies, including mandatory minimum penalties (MMPs).

Mandatory Minimum Penalties (MMPs)

Background

California Water Code section 13385 requires MMPs for specified violations of NPDES permits. For violations that are subject to those MMPs, the Water Board must either assess an Administrative Civil Liability (ACL) for the minimum penalty or assess an ACL for a greater amount. California Water Code section 13385(h) requires a MMP of \$3,000 for each "serious" violation. A serious violation is defined as any waste discharge that exceeds the effluent limitation for a Group I pollutant by 40 percent or more, a Group II pollutant by 20 percent or more, or failure to file a discharge monitoring report for each 30 days the report is late. It is important to note that all serious violations are considered to be priority violations. Priority violations are discussed in Section (A) above.

The Water Boards are also required by California Water Code section 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;
- Fails to file a report of waste discharge pursuant to California Water Code section 13260;
- 3) Files an incomplete report of waste discharge pursuant to California Water Code section 13260; or
- 4) Violates a toxicity effluent limitation where the WDR does not contain pollutantspecific effluent limitations for toxic pollutants.

California Water Code section 13385(j) includes several limited exceptions to the mandatory minimum penalty provisions. The primary exceptions are for discharges that are in compliance with a cease and desist order or time schedule order under narrowly specified conditions. California Water Code section 13385(k) provides an alternative to assessing MMPs against a publicly owned treatment works (POTW) that serves a small community with a financial hardship. This is because it was recognized that the per capita cost of treatment and compliance is often higher for these communities. Under this alternative, the Water Boards may require the POTW to spend an amount equivalent to the mandatory minimum penalty toward a compliance project that is designed to correct the violations.

Summary of MMP Violations and MMP Enforcement Actions

According to the CIWQS database, 18,442 MMP violations occurred between January 1, 2000 and December 31, 2007. Of these, 10,562 (57 percent) are recorded as having

received a minimum or greater penalty. Some portion of the reported effluent violations may qualify for statutory exemptions.

Table 11 shows the number of violations that have had penalties issued by each Regional Water Board office.

| Violations Subject to MMPs - January 2000 to December 2007 | | | | | | | | | |
|--|--|---------------------------------------|-------------------------|--------------------|--|--|--|--|--|
| % Withou | Violations Without Completed MMP Enforcement | Violations With MMP Enforcement | Total MMP Violations | Regional Office | | | | | |
| 40% | 578 | 862 | 1,440 | 1 | | | | | |
| 31% | 460 | 1,034 | 1,494 | 2 | | | | | |
| 31% | 232 | 526 | 758 | 3 | | | | | |
| 44% | 3,364 | 4,207 | 7,571 | 4 | | | | | |
| 39% | 429 | 678 | 1,107 | 5F | | | | | |
| 40% | 45 | 68 | 113 | 5R | | | | | |
| 58% | 2,026 | 1,493 | 3,519 | 5S | | | | | |
| 100% | 5 | 0 | 5 | 6A | | | | | |
| 95% | 87 | 5 | 92 | 6B | | | | | |
| 37% | 320 | 534 | 854 | 7 | | | | | |
| 18% | 138 | 616 | 754 | 8 | | | | | |
| 27% | 196 | 539 | 735 | 9 | | | | | |
| 43% | 7,880 | 10,562 | 18,442 | TOTAL | | | | | |

| Table 11: Status of Violations Subject to MMPs from January 2000 to December | er |
|--|----|
| 2007 | |

Table 12 lists the number of facilities in each Regional Water Board office that have one or more MMP violations, the number of facilities for which MMPs have been issued for all MMP violations, and the number of facilities that would require at least one enforcement action to cover the outstanding MMP violations. As shown, 491 or more enforcement actions would be necessary to cover the 7,880 violations subject to MMPs.

| Regional Office | Facilities with MMP effluent violations | Facilities with all MMP penalties issued | Facilities with pending MMP penalties |
|-----------------|---|--|---|
| 1 | 35 | 7 | 28 |
| 2 | 59 | 15 | 44 |
| 3 | 29 | 4 | 25 |
| 4 | 283 | 19 | 264 |
| 5F | 20 | 2 | 18 |
| 5R | 17 | 7 | 10 |
| 5S | 69 | 15 | 54 |
| 6A | 1 | 0 | 1 |
| 6B | 3 | 1 | 2 |
| 7 | 20 | 2 | 18 |
| 8 | 19 | 4 | 15 |
| 9 | 22 | 10 | 12 |
| TOTAL | 577 | 86 | 491 |

Table 12: Facilities with MMP Violations and Pending Enforcement ActionsJanuary 2000 to December 2007

Effectiveness of Mandatory Minimum Penalties on Effluent Violations

Early trends in MMP violations indicated an overall reduction in the number of violations at NPDES facilities. We believed that reduction was at least partly a result of increased compliance due to the deterrent effect of MMPs. Data in 2003 and 2004 showed an increase in violations, but we believe this is partly due to increased emphasis on recording and collecting these mandatory penalties. Additionally, the introduction of MMPs for reporting violations in 2004 put a greater emphasis on reviewing and tracking all such reports. The Regional Water Boards generally prioritize MMP issuance to facilities with greater compliance problems because of the staff resource costs associated with issuing MMPs and ACLs. While implementation of these MMPs was intended to be a streamlined process for penalty issuance, these penalties are often challenged by dischargers and can consume as much staff time as an ordinary ACL.

Our transition to a new data system in mid-2005 caused a drop in the numbers of MMP violations entered into the database and linked to the appropriate enforcement actions, limiting our ability to track some violations. This was due to confusion and concern regarding the proper use of this data system. We anticipate that electronic submittal of monitoring reports, and automated generation and tracking of violation information will significantly improve our confidence in the data for MMP violations, and should simplify MMP issuance. This may result in a greater number of known violations to validate and address, an increased need for enforcement responses to these violations, and a commensurate staff cost to issue them.

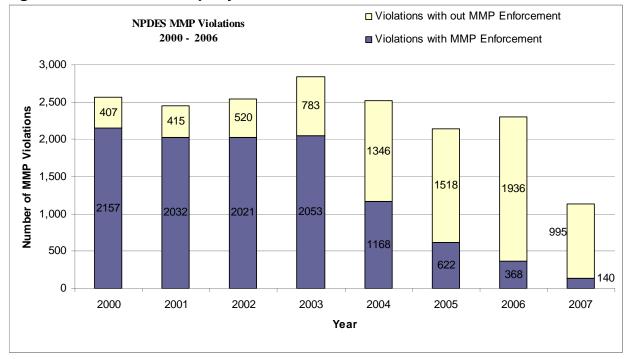
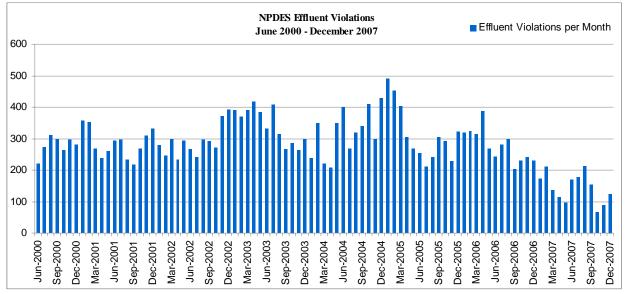


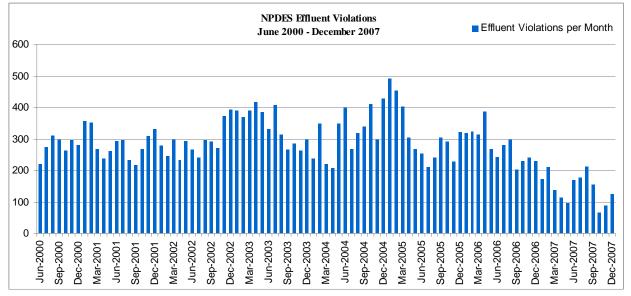
Figure 1: MMP violations per year since 2000.

Figure 1 shows MMP violations since 2000. We see a variation through the years. There is an initial decrease, followed by an increase in 2003 and 2004. This increase corresponds to an increased emphasis on collection and recording of violation data. The decrease in 2005 and 2006 reflects challenges to data collection related to implementation of a new data system in mid-2005 and competing priorities for staff time. Additionally, there are many MMP violations in 2007 that have not yet been entered by Regional Water Board staff.









The general trends in NPDES effluent violations shown in Figure 2 and overall violations in Figure 3 are consistent with that of Figure 1, and the reasons for this are largely the same.

Overall effectiveness

The data presented in the tables throughout this report provide various perspectives on Water Board effectiveness relative to violations and enforcement actions. Having this data in a database and being able to use it has been a significant accomplishment since the late 1990's. The data also reveals a substantial workload. Complications associated with deployment of the CIWQS database in mid-2005 have impacted the Water Boards' ability to effectively use this data to manage our enforcement program, and this was the subject of a recent external review. Recommendations from this review are discussed at the beginning of this report. The external panel's report is also available on-line at: http://www.waterboards.ca.gov/ciwqs/docs/ciwqs_prelimreport.pdf

Despite issuing millions of dollars in total penalties each year, and despite the changes from Fiscal Year 1996-1997 when only 5 percent of violations resulted in a formal enforcement action and 1 percent resulted in the assessment of an administrative civil liability,¹ the overall conclusion from review of the data is that the Water Boards need to further improve their effectiveness in handling violations and enforcement actions. However, despite this overall conclusion, there are success stories.

A case in point is an increased emphasis on prioritizing potential enforcement cases to ensure we are addressing the most significant threats. Based on an approach used by the San Diego Water Board, the Water Boards have developed a consistent format for prioritization, and regularly report this information to the State Water Board. Enforcement managers at each Regional Water Board meet regularly to discuss and prioritize potential enforcement cases.

Organizationally, the Regional Water Boards each have an identified enforcement unit or team, and the State Water Board created an Office of Enforcement in July, 2006 to ensure greater coordination and consistency in enforcement. Enforcement representatives from the Water Boards meet regularly to discuss enforcement matters and get feedback on enforcement approaches. The Office of Enforcement is also focusing on increased coordination with local, state, and federal law enforcement agencies, giving the Water Boards more enforcement tools and more efficient use of resources statewide in addressing water quality problems.

The Water Boards' Water Quality Enforcement Policy was last updated in 2002 (http://www.waterboards.ca.gov/plnspols/docs/wqep.doc) and is currently being revised. This Policy creates a framework for identifying and investigating instances of noncompliance, for taking enforcement actions that are appropriate in relation to the nature and severity of the violation, and for prioritizing enforcement resources to achieve maximum environmental benefits.

The Policy includes the following elements:

- An overview of water quality enforcement options.
- A process for identifying enforcement priorities and choosing the appropriate enforcement response.
- Provisions for more efficient use of standardized, enforceable permits and enforcement order language.
- Information to assist in integrated enforcement efforts with other agencies.
- Procedures for response to fraudulent reporting or knowingly withholding data.

¹ Legislative Analyst Office Analysis of 1999-2000 Budget Bill Resources Department 3 Issues.

• Specific guidance regarding assessment of administrative civil liability, use of supplemental environmental projects and compliance projects, handling of criminal activities, and standards for violation and enforcement reporting.

The Enforcement Policy provides appropriate approaches, practices, and considerations for effective enforcement. Improved implementation of the Enforcement Policy is needed to achieve its framework for effectiveness. Better implementation and needed changes will be addressed as the enforcement policy is revised in the following months. The draft revised Enforcement Policy can be found at: http://www.waterboards.ca.gov/water_issues/programs/enforcement/policy_revisions.sh tml

The Water Boards continue to face multiple competing priorities and pressures that limit our opportunities to implement the Enforcement Policy provisions. Issuing permits, for example, has become more complex and contentious in recent years. It has drawn staff resources away from dealing with violations and enforcement because of discharger reactions and challenges related to the California Toxics Rule, to MMPs, and to other factors. The number of permits each staff is responsible for issuing, overseeing, and enforcing has increased. MMPs have also changed enforcement priorities by mandating formal enforcement actions in response to violations that, given their relative threat to water quality, were often resolved through informal enforcement actions before. Mandatory issuance of penalties in the hundreds of thousands of dollars for some small communities has had a substantial impact on those communities, disproportionately impacting them relative to larger dischargers.

To overcome these obstacles and improve implementation of the Enforcement Policy, the Water Boards will undertake the following actions to increase staff efficiencies, prioritize enforcement activities, and increase management oversight and public information:

- Propose revision of the January 1 reporting deadline for the previous year's data to allow for more complete reporting of this data.
- Revise the Water Quality Enforcement Policy to ensure it is clear, current, and ensures compliance with existing permits and basin plans.
- Standardize NPDES permitting to increase certainty and expectations for staff and dischargers, and to restore efficiency and performance to these efforts.
- Standardize the issuance of MMPs to maximize efficiency and minimize the resource impacts of these new requirements.
- Continued development of electronic submittal and analysis of monitoring reports, and automated generation and tracking of violation information.
- Development of public reporting of violations and compliance rates of dischargers, both as a disincentive to violate and to build partnerships in enforcement with public interest groups and interested communities. This includes development and public reporting of enforcement performance measures on the Internet to engage the public in a productive dialogue about discharger performance, environmental effects, Water Board workload, and Water Board performance.

- Issuance of an annual enforcement report that expands upon the reporting in this document, and includes an analysis of available enforcement resources, violation and enforcement data for all of our regulatory programs, and development of enforcement performance measures.
- Conduct an assessment of violations at federal facilities, and discuss the findings and recommendations with USEPA.
- Ensure the data reports presented above are available for live, public use on the Internet.

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State Water Resources Control Board

Tam M. Doduc, Board Chair

| | Appendix B | | | | | | | |
|--|---|--|--|--|--|--|--|--|
| LISTING AND DESCRIPT | TIONS OF VIOLATION TYPES USED | | | | | | | |
| IN THE CI | IN THE CIWQS DATA SYSTEM | | | | | | | |
| Category 1 pollutant – Category 1 pollutants as defined b | Category 1 pollutant – Category 1 pollutants as defined by USEPA include: | | | | | | | |
| <u>Oxygen Demand</u> Biochemical Oxygen Demand Chemical Oxygen Demands Total Organic Carbon Other | Detergents and Oils MBAS NTA Oil and Grease Other detergents or algaecides | | | | | | | |
| <u>Solids</u> Total Suspended Solids (Residues) Total Dissolved Solids (Residues) Other | <u>Minerals</u> Calcium, Chloride, Fluoride, Magnesium, Sodium, Potassium, Sulfur, Sulfate, Total Alkalinity, Total Hardness, Other Minerals | | | | | | | |
| <u>Nutrients</u> Inorganic Phosphorus Compounds Inorganic Nitrogen Compounds Other | <u>Metals</u> Aluminum, Cobalt, Iron, Vanadium | | | | | | | |
| Category 2 pollutant - Category 2 pollutants as defined to | by USEPA: | | | | | | | |
| <u>Metals</u> (all forms) - Other metals not specifically listed un <u>Inorganics</u> - Cyanide, Total Residual Chlorine | | | | | | | | |
| Organics - All organics are Group II except those specific | | | | | | | | |
| Other effluent violation – Any violation of an effluent requ | | | | | | | | |
| Chronic Toxicity – Violation of a chronic toxicity effluent i | | | | | | | | |
| Acute Toxicity – Violation of an acute toxicity effluent req | • | | | | | | | |
| | any permit condition not pertaining to effluent requirements. | | | | | | | |
| Reporting – Late report, failure to submit a report, or a re | eport that is either not complete or contains errors. | | | | | | | |
| <u>Monitoring</u> – Failure to conduct required monitoring <u>Compliance schedule</u> – Failure to comply with a complia enforcement order likes a Cease & Desist and Time Sch <u>Sanitary Sewer Overflow</u> – Any spill from a sanitary sewer | | | | | | | | |
| | | | | | | | | |
| Unauthorized Discharge – Any discharge other than allo | | | | | | | | |
| Unregulated Discharge – Discharge from a site not curre | | | | | | | | |
| <u>Groundwater</u> – Any release to groundwater that violates | | | | | | | | |
| <u>BMP</u> – Failure to implement proper best management pr <u>SWPPP</u> – Failure to complete or update a stormwater po | | | | | | | | |
| <u>Failure to obtain permit</u> – Failure to obtain the appropriat | | | | | | | | |
| <u>Other Codes</u> – Violations of codes sections other that the | | | | | | | | |
| | e California Water Code. enforcement order by not meeting its requirements, its time | | | | | | | |
| Basin Plan Prohibition – Violation of any basin plan prohibition. | | | | | | | | |

Appendix C

Types and Classification of Enforcement Actions

| Type of Enforcement Action | Description | Classification |
|--|--|----------------|
| Verbal Communication | Any communication regarding the violation that takes place in person or by telephone. | Informal |
| Staff Enforcement Letter | Any written communication regarding violations and possible enforcement actions that is signed at the staff level. | Informal |
| Notice of Violation | A letter officially notifying a discharger of a violation and the possible enforcement actions, penalties, and liabilities that may result. This letter is signed by the Executive Officer. | Informal |
| Notice to Comply | Issuance of a Notice to Comply per Water Code Section 13399. | Formal |
| 13267 Letter | 3267 Letter A letter utilizing Water Code Section 13267 authority to require further information or studies. | |
| Clean-up and Abatement Order | Any order pursuant to Water Code Section 13304. | Formal |
| Cease and Desist Order | Any order pursuant to Water Codes Sections 13301- 13303. | Formal |
| Time Schedule Order | Any order pursuant to Water Code Section 13300. | Formal |
| Administrative Civil Liability (ACL) Complaint | ACL Complaint issued by the Executive Officer for liability pursuant to Water Code 13385. | Formal |
| Administrative Civil Liability (ACL) Order | An ACL Order that has been imposed by the Water Board or SWRCB. | Formal |
| Settlement | A settlement agreement per California Government Code Section 11415.6 | Formal |
| Referral | Referral to the District Attorney, Attorney General, or USEPA. | Formal |
| Referred to a Task Force | Any referral of a violation to an environmental crimes task force. | Formal |
| Referral to Other Agency | Any referral to another State Agency. | Formal |
| Third Party Action An enforcement action taken by a non-governmental third party and to which the State or Water Board is a party. | | Formal |
| Waste Discharge Requirements | Any modification or rescission of Waste Discharge Requirements in response to a violation. | Formal |

Appendix D

List of Facilities with Effluent Violations Subject to MMP Actions and Violations Receiving Penalties by Regional Board Office from 1-1-2000 through 11-29-2007.

| Regional Office | AGENCY | FACILITY | WDID | MMP Violations (Includes both confirmed and alleged MMP violations) | Violations Receiving Penalty (Does not include pending Penalties) |
|-----------------|----------------------------------|----------------------------------|-------------|---|---|
| 1 | LOLETA CSD | LOLETA POTW | 1B80081OHUM | 228 | 142 |
| 1 | TULELAKE CITY | TULELAKE CITY WWTP | 1A84002OSIS | 179 | 135 |
| 1 | ARCATA CITY | ARCATA CITY WWTF | 1B82114OHUM | 178 | 126 |
| 1 | SONOMA CNTY WATER AGENCY | SCWA OCCIDENTAL CSD | 1B83001OSON | 145 | 102 |
| 1 | MCKINLEYVILLE CSD | MCKINLEYVILLE WWTP | 1B82084OHUM | 122 | 81 |
| 1 | FORT BRAGG CITY | FORT BRAGG CITY WWTP | 1B84083OMEN | 72 | 66 |
| 1 | CRESCENT CITY HARBOR DISTRICT | CC HARBOR SEAFOOD WW SYSTEM | 1A84005ODN | 64 | 1 |
| 1 | STOCKTON PACIFIC ENT INC | EVERGREEN PULP INC (LP SAMOA) | 1B77005OHUM | 63 | 39 |
| 1 | FERNDALE CITY | FERNDALE CITY POTW | 1B83136OHUM | 55 | 24 |
| 1 | FORESTVILLE WATER DISTRICT | FORESTVILLE WATER DISTRICT | 1B83100OSON | 47 | 33 |
| 1 | SANTA ROSA CITY | SANTA ROSA CITY WWTP, LAGUNA | 1B83099OSON | 42 | 17 |
| 1 | CRESCENT CITY | CRESCENT CITY WWTP | 1A84006ODN | 34 | 24 |
| 1 | MENDO CO WWD #2 ANCHOR BAY | MENDOCINO CWWD#2- ANCHOR BAY | 1B83118OMEN | 31 | 0 |
| 1 | FORTUNA CITY | FORTUNA CITY WWTP | 1B83135OHUM | 27 | 12 |
| 1 | SONOMA CNTY WATER AGENCY | SCWA RUSSIAN RIVER CSD | 1B82045OSON | 27 | 27 |
| 1 | HCRID #1 | SHELTER COVE POTW | 1B84086OHUM | 23 | 0 |
| 1 | REDWAY CSD | REDWAY POTW | 1B83147OHUM | 14 | 4 |
| 1 | SONOMA CNTY WATER AGENCY | GRATON CSA | 1B84060OSON | 12 | 10 |
| 1 | SONOMA WEST HOLDINGS INC | PLANT #2 FACILITY | 1B81202OSON | 11 | 0 |
| 1 | EVERGREEN PULP INC | EVERGREEN PULP INC (LP SAMOA) | 1B77005OHUM | 10 | 0 |
| 1 | HEALDSBURG CITY | HEALDSBURG CITY WWTP | 1B82046OSON | 10 | 0 |
| 1 | WILLITS CITY | WILLITS CITY WWTP | 1B80078OMEN | 9 | 6 |
| 1 | CLOVERDALE, CITY OF | CLOVERDALE CITY WWTP | 1B84032OSON | 7 | 0 |
| 1 | COLLEGE OF THE REDWOODS | COLLEGE OF THE REDWOODS, POTW | 1B80121OHUM | 7 | 0 |

| Regional Office | AGENCY | FACILITY | WDID | MMP Violations (Includes both confirmed and alleged MMP violations) | Violations Receiving Penalty (Does not include pending Penalties) |
|-----------------|---------------------------------------|---------------------------------|---------------------|---|---|
| 1 | HARWOOD PRODUCTS | HARWOOD PROD. BRANSCOMB MILL | 1B83056OMEN | 5 | 5 |
| 1 | RIO DELL CITY | RIO DELL CITY WWTF | 1B83134OHUM | 3 | 0 |
| 1 | UKIAH CITY | UKIAH CITY WWTP | 1B84029OMEN | 3 | 0 |
| 1 | CA DEPT OF FISH & GAME REDDING | CDF&G TRINITY RIVER HATCHERY | 1A80077OTRI | 2 | 2 |
| 1 | CRESCENT CITY HARBOR DISTRICT | CC HARBOR SEAFOOD WW SYSTEM | 1A84005ODN | 2 | 0 |
| 1 | EUREKA CITY | EUREKA CITY ELK RIVER WWTP | 1B82151OHUM | 2 | 1 |
| 1 | MENDOCINO CITY CSD | MENDOCINO CITY CSD | 1B83129OMEN | 2 | 2 |
| 1 | EUREKA CITY | EUREKA CITY ELK RIVER WWTP | 1B82151OHUM | 1 | 1 |
| 1 | GRATON CSD | GRATON CSA | 1B84060OSON | 1 | 1 |
| 1 | GREEN DIAMOND RESOURCE CO - KORBEL | KORBEL SAWMILL & WWDS | 1B80020OHUM | 1 | 0 |
| 1 | PALCO | PL SCOTIA | 1B83104OHUM | 1 | 1 |
| | | | REGION TOTAL | 1440 | 862 |

| Regional Office | AGENCY | FACILITY | WDID | MMP Violations (Includes both confirmed and alleged MMP violations) | Violations Receiving Penalty (Does not include pending Penalties) |
|-----------------|------------------------------------|---------------------------------------|-------------|---|---|
| 2 | PACIFICA, CITY OF | CALERA CREEK WATER RECYCLING PLANT | 2 417022002 | 160 | 26 |
| 2 | HANSON AGGREGATES | 4501 TIDEWATER AVE, OAKLAND | 2 019216001 | 89 | 0 |
| 2 | NOVATO SANITARY DISTRICT | NOVATO AND IGNACIO WWTP | 2 215022001 | 87 | 76 |
| 2 | SONOMA VALLEY COUNTY SD | SONOMA VALLEY COUNTY SD WWTP | 2 494009001 | 79 | 77 |
| 2 | FAIRFIELD-SUISUN SEWER DISTRICT | FSSD SUBREGIONAL WWTP | 2 482005001 | 73 | 20 |
| 2 | PETALUMA CITY | PETALUMA WPCP | 2 494006001 | 73 | 68 |
| 2 | RICHMOND CITY | RICHMOND WPCP | 2 071037001 | 73 | 59 |
| 2 | NAPA SANITATION DISTRICT | NAPA SD WWTP | 2 283009001 | 63 | 48 |

| Regional Office | AGENCY | FACILITY | WDID | MMP Violations (Includes both confirmed and alleged MMP violations) | Violations Receiving Penalty (Does not include pending Penalties) |
|-----------------|--|--|-------------|---|---|
| 2 | HANSON AGGREGATES | HANSON AGGREGATES SF PIER 92 | 2 386028001 | 55 | 55 |
| 2 | PALO ALTO, CITY OF | PALO ALTO REGIONAL WQCP | 2 438011001 | 54 | 54 |
| 2 | C & H SUGAR | C & H SUGAR WWTP | 2 071006001 | 48 | 47 |
| 2 | EAST BROTHER LIGHT STATION INC | EAST BROTHER LIGHT STATION INC | 2 071227001 | 48 | 0 |
| 2 | GENERAL CHEMICAL | GENERAL CHEMICAL- WWTP | 2 071001001 | 47 | 46 |
| 2 | SOUTH SAN FRANCISCO-SAN BRUNO WQCP | SOUTH SAN FRANCISCO-SAN BRUNO WQCP | 2 417038001 | 47 | 40 |
| 2 | SAUSALITO-MARIN CITY SAN DIST | SAUSALITO STP | 2 215023001 | 39 | 38 |
| 2 | RODEO SANITARY DISTRICT | RODEO SANITARY DISTRICT WWTP | 2 071039001 | 37 | 37 |
| 2 | AMERICAN CANYON CITY | AMERICAN CANYON WASTEWATER TREATMENT AND | 2 283021001 | 33 | 33 |
| 2 | CONOCOPHILLIPS RODEO | CONOCOPHILLIPS' S.F. REFINERY, RODEO - S | 2 071051001 | 29 | 19 |
| 2 | BENICIA, CITY OF | BENICIA WWTP | 2 482001001 | 28 | 27 |
| 2 | CALISTOGA CITY | CALISTOGA CITY DUNAWEAL WWTP | 2 283003001 | 26 | 24 |
| 2 | SAN MATEO CITY | SAN MATEO WWTP | 2 417035001 | 24 | 22 |
| 2 | LAS GALLINAS VALLEY SD | LAS GALLINAS WWTP | 2 215012001 | 23 | 20 |
| 2 | SEWER AUTHORITY MID- COASTSIDE | SAM WWTP (SEWER AUTHORITY MID-COASTSIDE | 2 417068001 | 22 | 20 |
| 2 | WEST COUNTY AGENCY | COMBINED OUTFALL | 2 071107001 | 21 | 11 |
| 2 | CONTRA COSTA COUNTY SD NO. 5 | PORT COSTA WWTP | 2 071034001 | 19 | 19 |
| 2 | VALLEJO SAN AND FLOOD CONT DIS | VALLEJO SFCD WWTP | 2 482012001 | 17 | 16 |
| 2 | SUNNYVALE CITY | SUNNYVALE WPCP | 2 438018001 | 16 | 16 |
| 2 | SAN FRANCISCO AIRPORT COMMISSION | SAN FRANCISCO INTERNATIONAL AIRPORT WQCP | 2 417032001 | 15 | 14 |
| 2 | CENTRAL MARIN SANITATION AGENCY | CENTRAL MARIN SAN. AGCY. WWTP | 2 215116001 | 14 | 13 |
| 2 | CA DEPT OF PARKS & REC (ANGEL ISLAND) | ANGEL ISLAND STATE PK - WWTP | 2 215002001 | 12 | 11 |
| 2 | PINOLE, CITY OF | CITY OF PINOLE WWTP | 2 071032001 | 12 | 9 |

| Regional Office | AGENCY | FACILITY | WDID | MMP Violations (Includes both confirmed and alleged MMP violations) | Violations Receiving Penalty (Does not include pending Penalties) |
|-----------------|---|--|-------------|---|---|
| 2 | SAN FRANCISCO AIRPORT COMMISSION | SAN FRANCISCO INTERNATIONAL AIRPORT IWTP | 2 417033001 | 12 | 7 |
| 2 | TESORO REFINING & MARKETING CO | GOLDEN EAGLE REFINERY WWTP | 2 071048001 | 11 | 10 |
| 2 | BURLINGAME CITY | BURLINGAME WWTP | 2 417005001 | 10 | 10 |
| 2 | DELTA DIABLO SANITATION DIST. | DELTA DIABLO SAN. DIST. WWTP | 2 071013001 | 8 | 8 |
| 2 | SEWERAGE AGENCY OF SOUTHERN MARIN | SASM WWTP | 2 215015001 | 8 | 6 |
| 2 | VALERO REFINING COMPANY- CA | VALERO BENICIA REFINERY | 2 482004001 | 8 | 0 |
| 2 | GENERAL ELECTRIC COMPANY | VALLECITOS NUCLEAR CENTER WWTP | 2 019018001 | 6 | 4 |
| 2 | SOUTH BAYSIDE SYSTEM AUTHORITY | SBSA WWTP | 2 417037001 | 6 | 0 |
| 2 | DUBLIN SAN RAMON SERVICES DISTRICT (WWTP | DUBLIN SAN RAMON SD WWTP | 2 019033001 | 5 | 4 |
| 2 | LIVERMORE CITY | CITY OF LIVERMORE WRP | 2 019025001 | 5 | 5 |
| 2 | WEST COUNTY WASTEWATER DISTRICT | WEST COUNTY WW DISTRICT WPCP | 2 071107001 | 4 | 0 |
| 2 | MARTINEZ REFINING CO | SHELL MARTINEZ REFINERY WWTP | 2 071042001 | 3 | 2 |
| 2 | MILLBRAE, CITY OF | MILLBRAE WWTP | 2 417019001 | 3 | 0 |
| 2 | NEW CENTURY BEVERAGE COMPANY | BOTTLING GROUP LLC | 2 019320001 | 3 | 2 |
| 2 | GWF POWER SYSTEMS L. P. | GWF -SITE I (E. THIRD ST.) POWER PLANT | 2 071170001 | 2 | 1 |
| 2 | KOBE PRECISION INC | KOBE PRECISION INC | 2 019328001 | 2 | 2 |
| 2 | SAN FRANCISCO, CITY & CO | SF - SE NORTH POINT & BAYSIDE | 2 386010001 | 2 | 1 |
| 2 | SANTA CLARA CO ROADS & AIRPORT | OREGON EXP UNDERPASS | 2 438265002 | 2 | 2 |
| 2 | USS-POSCO INDUSTRIES | USS POSCO INDUSTRIES - NPDES/SUB15 | 2 071059001 | 2 | 1 |
| 2 | CHEVRON PRODUCTS COMPANY | RICHMOND REFINERY | 2 071044001 | 1 | 1 |

| Regional Office | AGENCY | FACILITY | WDID | MMP Violations (Includes both confirmed and alleged MMP violations) | Violations Receiving Penalty (Does not include pending Penalties) |
|-----------------|---|---|---------------------|---|---|
| 2 | EAST BAY MUNICIPAL UTILITY DISTRICT (WPC | EBMUD SD#1-WET WTHR BYPASS | 2 019014002 | 1 | 0 |
| 2 | MARIN COUNTY SANITARY DISTRICT #5 | MARIN CSD 5 PARADISE COVE WWTP | 2 215021002 | 1 | 0 |
| 2 | MIRANT DELTA, LLC | PITTSBURG POWER PLANT | 2 071030001 | 1 | 0 |
| 2 | MORTON INTERNATIONAL, INC. | MORTON SALT DIVISION- NEWARK | 2 019112001 | 1 | 0 |
| 2 | MT. VIEW SANITARY DISTRICT | MT. VIEW SANITARY DISTRICT WWTP | 2 071029001 | 1 | 1 |
| 2 | NORTH SAN MATEO COUNTY SANITATION DISTRI | NORTH SAN MATEO COUNTY SANITATION DISTRI | 2 417021001 | 1 | 1 |
| 2 | ORO LOMA SANITARY DISTRICT | ORO LOMA/CASTRO VALLEY SD WPCP | 2 019032001 | 1 | 0 |
| 2 | PACIFIC GAS & ELECTRIC CO | HUNTERS POINT POWER PL | 2 386003001 | 1 | 1 |
| 2 | (UNKNOWN) | CA MOZZERELLA FRESCA | 2 482075N01 | 0 | 0 |
| 2 | SAN JOSE CITY | SAN JOSE/SANTA CLARA WPCP | 2 438014001 | 0 | 0 |
| | | | REGION TOTAL | 1494 | 1034 |

| Regional Office | AGENCY | FACILITY | WDID | MMP Violations (Includes both confirmed and alleged MMP violations) | Violations Receiving Penalty (Does not include pending Penalties) |
|-----------------|--------------------------|--------------------------|-------------|---|---|
| 3 | CA DEPT OF CORRECTIONS | CALIFORNIA MEN'S COLONY | 3 400108001 | 176 | 105 |
| 3 | PISMO BEACH, CITY OF | PISMO BEACH WWTP | 3 400106001 | 147 | 135 |
| 3 | SAN SIMEON CSD | SAN SIMEON WWTP | 3 400110001 | 79 | 75 |
| 3 | CA STATE PARKS | BIG BASIN WWTP | 3 440800001 | 51 | 46 |
| 3 | KING VENTURES | AVILA VALLEY HOT SPRINGS | 3 40041144 | 42 | 0 |
| 3 | SAN LUIS OBISPO, CITY OF | SAN LUIS OBISPO WWTP | 3 400107001 | 40 | 22 |
| 3 | SANTA BARBARA CITY PWD | EL ESTERO WWTP NPDES | 3 420108001 | 39 | 34 |
| 3 | HIGHLANDS SANITARY ASSOC | HIGHLANDS SA WWTP | 3 270115001 | 31 | 31 |
| 3 | LOMPOC CITY | LOMPOC REGIONAL WWTP | 3 420105001 | 27 | 19 |
| 3 | PASO ROBLES, CITY OF | PASO ROBLES WWTP | 3 400105001 | 26 | 14 |

| Regional Office | AGENCY | FACILITY | WDID | MMP Violations (Includes both confirmed and alleged MMP violations) | Violations Receiving Penalty (Does not include pending Penalties) |
|-----------------|-----------------------------------|--------------------------------------|---------------------|---|---|
| 3 | RAGGED POINT INN | RAGGED POINT INN MOTEL | 3 401001001 | 22 | 22 |
| 3 | SYCAMORE MINERAL SPRINGS | SYCAMORE MINERAL SPRINGS | 3 400401145 | 15 | 0 |
| 3 | MORRO BAY POWER PLANT | MORRO BAY POWER PLANT | 3 402003002 | 10 | 4 |
| 3 | MORRO BAY SD | MORRO BAY/CAYUCOS WWTP | 3 400103001 | 9 | 8 |
| 3 | SAN JUAN BAUTISTA, CITY OF | SAN JUAN BAUTISTA WWTP | 3 350102001 | 9 | 3 |
| 3 | CARPINTERIA SD | CARPINTERIA SD WWTP | 3 420101001 | 7 | 4 |
| 3 | CEMEX USA | CEMEX SANTA CRUZ CEMENT | 3 442004003 | 6 | 1 |
| 3 | CALIFORNIA WATER SERVICE | CAL WATER STATIONS 64, 67, 69, 40-01 | 3 270307105 | 3 | 0 |
| 3 | MOSS LANDING POWER PLANT | MOSS LANDING POWER PLANT | 3 272011001 | 3 | 0 |
| 3 | UNI-KOOL COMPANY | UNI-KOOL ABBOTT ST | 3 272009001 | 3 | 0 |
| 3 | CARMEL AREA WWD | CARMEL AREA WWTP | 3 270101001 | 2 | 2 |
| 3 | CUYAMA COMMUNITY SERVICES DIST | CUYAMA CSD WWTP | 3 421003001 | 2 | 0 |
| 3 | GILROY, CITY OF | TEST WELL DRILLING PROGRAM | 3 430403188 | 2 | 0 |
| 3 | SOUTH SAN LUIS OBISPO CO SD | SOUTH SAN LUIS OBISPO SD WWTP | 3 400111001 | 2 | 0 |
| 3 | CEMEX USA | RMC PACIFIC OLYMPIA SAND PLNT | 3 442004003 | 1 | 0 |
| 3 | GOLETA SD | GOLETA SD WWTP | 3 420102001 | 1 | 1 |
| 3 | PACIFIC GAS & ELECTRIC COMPANY | PG&E DIABLO CANYON POWER PLANT | 3 402003001 | 1 | 0 |
| 3 | UNI-KOOL COMPANY | UNI-KOOL SALINAS FACILTY | 3 272016001 | 1 | 0 |
| 3 | WELL-PICT BERRIES, INC. | WELL-PICT BERRIES, INC. | 3 440505306 | 1 | 0 |
| 3 | AVILA BEACH CSD | AVILA WWTP | 3 400101001 | 0 | 0 |
| | | | REGION TOTAL | 758 | 526 |

| Regional Office | AGENCY | FACILITY | WDID | MMP Violations (Includes both confirmed and alleged MMP violations) | Violations Receiving Penalty (Does not include pending Penalties) |
|-----------------|--|---|-------------|---|---|
| 4 | SANTA PAULA CITY | SANTA PAULA WWRP | 4A560108001 | 2900 | 2899 |
| 4 | SIX FLAGS MAGIC MOUNTAIN | AMUSEMENT PARK, VALENCIA | 4A199002002 | 636 | 10 |
| 4 | DR HORTON LOS ANGELES HOLDING CO | OLY MANDALAY BAY SEA BRIDGE | 4A561334001 | 223 | 0 |
| 4 | SAN BUENAVENTURA CITY | VENTURA WRF | 4A560107001 | 206 | 193 |
| 4 | FILLMORE CITY | FILLMORE WWTP | 4A560101002 | 197 | 87 |
| 4 | LOS ANGELES DWP | HAYNES GENERATING STATION | 4B193500002 | 190 | 71 |
| 4 | CAMARILLO SANITARY DISTRICT | CAMARILLO WRP | 4A560100001 | 156 | 56 |
| 4 | THE BOEING COMPANY | SANTA SUSANA FIELD LABORATORY | 4A562013002 | 147 | 90 |
| 4 | PRAXAIR INC | PRAXAIR, WILMINGTON | 4B192140001 | 91 | 90 |
| 4 | MCA / UNIVERSAL CITY STUDIOS | UNIVERSAL CITY STUDIOS | 4B199017001 | 86 | 86 |
| 4 | SANTA CLARITA CITY | DRAINAGE BENEFIT ASSESSMENT AREAS 6 &18 | 4A191142001 | 85 | 22 |
| 4 | WHEELABRATOR NORWALK ENERGY CO | STATE HOSPITAL COGENERATION PLANT | 4B191168001 | 82 | 82 |
| 4 | LOS ANGELES CNTY SANITATION DISTRICTS | VALENCIA WWRP | 4A190107023 | 77 | 61 |
| 4 | EMERY FORWARDING | PTI TECHNOLOGICS | 4A562443001 | 62 | 0 |
| 4 | MAMMOTH APARTMENTS, LLC | MAMMOTH APARTMENTS | 4B196000546 | 59 | 0 |
| 4 | VOPAK TERMINAL LOS ANGELES INC | VOPAK TERMINAL LOS ANGELES INC. | 4B199019002 | 54 | 32 |
| 4 | LOS ANGELES DWP | SCATTERGOOD GENERATING STATION | 4B193500003 | 51 | 45 |
| 4 | HARRIS WATER CONDITIONING | CULLIGAN WATER | 4A561037001 | 50 | 3 |
| 4 | COUNTRYWIDE FINANCIAL CORP | COUNTRYWIDE HOME LOANS (WESTLAKE VILLAGE | 4B196400034 | 49 | 0 |
| 4 | THOUSAND OAKS CITY OF DPW | HILL CANYON WWTP | 4A560112001 | 43 | 38 |
| 4 | REDONDO BEACH CITY | SEASIDE LAGOON | 4B190143001 | 41 | 16 |
| 4 | AES REDONDO BEACH, LLC | REDONDO GENERATING STATION | 4B192111003 | 40 | 37 |
| 4 | CONOCOPHILLIPS COMPANY | LOS ANGELES LUBRICANTS PLANT | 4B192131013 | 38 | 0 |
| 4 | LOS ANGELES CNTY SANITATION DISTRICTS | LOS COYOTES WWRP | 4B190107015 | 38 | 0 |
| 4 | LOS ANGELES TURF CLUB | SANTA ANITA PARK | 4B191319001 | 33 | 0 |
| 4 | OJAI VALLEY SANITARY DISTRICT | OJAI VALLEY WWTP | 4A560104001 | 33 | 25 |

| Regional Office | AGENCY | FACILITY | WDID | MMP Violations (Includes both confirmed and alleged MMP violations) | Violations Receiving Penalty (Does not include pending Penalties) |
|-----------------|---|---|-------------|---|---|
| 4 | DTSC/ENGLAND & ASSOC. | SOUTHLAND OIL SITE (FORMER) | 4B196800033 | 31 | 0 |
| 4 | INDUSTRY URBAN DEVELOPMENT AGENCY | CHERYL LANE DEWATERING SYSTEM | 4B196000632 | 30 | 0 |
| 4 | RADISSON LOS ANGELES AIRPORT | RADISSON LOS ANGELES AIRPORT | 4B196400060 | 30 | 0 |
| 4 | ROYAL CATERING | ROYAL CATERING, EL MONTE | 4B191106001 | 30 | 30 |
| 4 | SIMI VALLEY CITY | SIMI VALLEY WWRP | 4A560110001 | 29 | 13 |
| 4 | BURBANK CITY DPW | BURBANK WWRP | 4B190101001 | 28 | 0 |
| 4 | CA DEPT OF TRANSPORTATION DISTRICT 7 R4 | ROUTE I-10 PAVEMENT REHAB. PROJECT | 4B196000504 | 28 | 0 |
| 4 | LAS VIRGENES MWD | TAPIA WRF | 4B190104001 | 28 | 2 |
| 4 | LOS ANGELES COUNTY METROPOLITAN TRANSPOR | SEGMENTS 1,2A,2B,3 OPERATIONS | 4B192515004 | 28 | 28 |
| 4 | BEVERLY PLACE, L.P. | BEVERLY MERCEDES PLACE | 4B196000371 | 27 | 0 |
| 4 | HEXION SPECIALTY CHEMICALS, INC. | HEXION SPECIALTY CHEMICALS, INC. (FORMER | 4B191297001 | 25 | 11 |
| 4 | OXNARD CITY | REDWOOD TRUNK SEWER PROJECT | 4A567500002 | 24 | 0 |
| 4 | WASHINGTON MUTUAL | SHERMAN OAKS BRANCH | 4B196000144 | 24 | 0 |
| 4 | AIR PRODUCT & CHEMICALS | HYDROGEN PLANT & RELATED FACILITY | 4B191285001 | 23 | 23 |
| 4 | LOS ANGELES CITY, BUREAU OF SANITATION | DONALD TILLMAN WWRP | 4B190106004 | 23 | 0 |
| 4 | LOS ANGELES CNTY SANITATION DISTRICTS | SAN JOSE CREEK WWRP | 4B190107020 | 23 | 0 |
| 4 | SIERRACIN/SYLMAR CORP. | SIERRACIN.SYLMAR CORP. | 4B196400009 | 23 | 0 |
| 4 | CA DEPT OF WATER RESOURCES PEARL | WILLIAM E WARNE POWER PLANT | 4A190805002 | 22 | 0 |
| 4 | KINDER MORGAN (FORMER GATX) | CARSON TERMINAL | 4B192238002 | 22 | 11 |
| 4 | ROBERT CHAN | B.C. PLAZA | 4B196400047 | 22 | 0 |
| 4 | KINDER MORGAN (FORMER GATX) | SAN PEDRO MARINE TERMINAL | 4B192124001 | 21 | 0 |
| 4 | LOS ANGELES CNTY SANITATION DISTRICTS | SAUGUS WWRP | 4A190107021 | 21 | 0 |
| 4 | RELIANT ENERGY MANDALAY, LLC | MANDALAY GENERATING STATION | 4A562019001 | 21 | 1 |
| 4 | RODEO OWNER CORP. | TWO RODEO ASSOCIATES | 4B196000373 | 21 | 10 |
| 4 | KOREAN WORLD TOWER | LOS ANGELES APARTMENT BLDG | 4B191019001 | 20 | 0 |

| Regional Office | AGENCY | FACILITY | WDID | MMP Violations (Includes both confirmed and alleged MMP violations) | Violations Receiving Penalty (Does not include pending Penalties) |
|-----------------|---|---|-------------|---|---|
| 4 | PAGE MUSEUM @ LA BREA TAR PITS | PAGE MUSEUM @ LA BREA TAR PITS | 4B196000333 | 20 | 0 |
| 4 | HONEYWELL INC. | HONEYWELL INC. | 4B191263001 | 19 | 0 |
| 4 | PARAMOUNT PETROLEUM CORP. | PARAMOUNT REFINERY | 4B192348001 | 19 | 0 |
| 4 | SKYWORKS SOLUTIONS, INC. | SKYWORKS SOLUTIONS, INC. | 4A562074001 | 19 | 19 |
| 4 | TIDELANDS OIL PRODUCTION CO. | WILMINGTON AND TERMINAL ISLAND | 4B192023001 | 18 | 0 |
| 4 | KIM & CASEY, LLC | RENO APARTMENTS | 4B196000336 | 17 | 0 |
| 4 | LA CO PARKING AUTHORITY | WALT DISNEY HALL PARKING | 4B196000076 | 17 | 0 |
| 4 | LOS ANGELES CNTY SANITATION DISTRICTS | POMONA WWRP | 4B190107019 | 17 | 0 |
| 4 | NEWLOWE PROPERTIES LLC C/O HAZARD MANAGE | SAN FERNANDO ROAD SITE | 4B196800012 | 17 | 0 |
| 4 | RAYNE WATER SYSTEMS OF VENTURA | SOFT WATER SALES & SVC,VENTURA | 4A569002001 | 17 | 0 |
| 4 | WHITTAKER CORP | WHITTAKER-BERMITE FACILITY (FORMER) | 4A197500025 | 17 | 0 |
| 4 | 750 GARLAND, LLC | 750 GARLAND, LLC | 4B191070002 | 16 | 0 |
| 4 | FOREST LAWN MEMORIAL PARK | FOREST LAWN MEMORAL PARK, COVINA HILLS | 4B197500192 | 16 | 0 |
| 4 | LOS ANGELES DWP | TANK A,B,C,D AREA, HAYNES TANK FARM, LON | 4B190106007 | 16 | 13 |
| 4 | REALTECH, INC. | MAPLE PLAZA | 4B196000358 | 16 | 0 |
| 4 | VENTURA CO WATERSHED PROTECTION DISTRICT | ARUNDELL BARRANCA | 4A567500001 | 16 | 0 |
| 4 | CA DEPT OF TRANSPORTATION DISTRICT 7 R5 | ROUTE I-105 DEWATERING SYSTEM - GARFIELD | 4B198800070 | 15 | 0 |
| 4 | HANKEY INVESTMENT COMPANY | MIDWAY FORD | 4B196600193 | 15 | 0 |
| 4 | KAISER ALUMINUM FABRICATED PRODUCTS, LLC | LOS ANGELES, CALIFORNIA PLANT | 4B192389001 | 15 | 0 |
| 4 | PLATINUM PARADIGM PROPERTIES | NORTH CRESCENT REALTY V, LLC | 4B191112001 | 15 | 0 |
| 4 | 550 SOUTH HOPE STREET ASSOCIATES | 550 SOUTH HOPE STREET BUILDING | 4B196000003 | 14 | 0 |
| 4 | AES ALAMITOS, L.L.C. | ALAMITOS GENERATING STATION | 4B192111006 | 14 | 0 |
| 4 | BOC GASES | BOC GASES - EL SEGUNDO | 4B196400066 | 14 | 0 |
| 4 | CSU LONG BEACH | CSU, LONG BEACH, POOL, ETC | 4B190800001 | 14 | 14 |
| 4 | DAYTON SUPERIOR SPECIALTY CHEM | EDOCO | 4B192034001 | 14 | 0 |

| Regional Office | AGENCY | FACILITY | WDID | MMP Violations (Includes both confirmed and alleged MMP violations) | Violations Receiving Penalty (Does not include pending Penalties) |
|-----------------|--|--|-------------|---|---|
| 4 | G & K MANAGEMENT CO., INC. | GRAND PROMENADE | 4B196000135 | 14 | 0 |
| 4 | MAGUIRE PROPERTIES | ONE CALIFORNIA PLAZA | 4B196000193 | 14 | 0 |
| 4 | PLAZA 6000 PARTNERS LLC | RENO APARTMENTS | 4B191210001 | 14 | 0 |
| 4 | RP 120, LLC | RP 120, LLC | 4B196000409 | 14 | 0 |
| 4 | SNYDER-MASSELIN VENTURE L.P. | OFFICE DEPOT | 4B197500033 | 14 | 0 |
| 4 | AVALON, CITY OF | AVALON WWTF | 4B190100001 | 13 | 0 |
| 4 | UNITED OIL COMPANY | UNITED - RAPID GAS STATION #19 | 4B196100121 | 13 | 0 |
| 4 | CALIFORNIA DOMESTIC WATER CO | BASSETT WELLFIELD | 4B197600025 | 12 | 0 |
| 4 | CARRAMERICA REALTY CORP. | CARRAMERICA OFFICE BUILDING | 4B196000474 | 12 | 0 |
| 4 | COPPERFIELD INVESTMENT & DEVELOPMENT | WILSHIRE-HIGHLAND BUILDING | 4B196000239 | 12 | 0 |
| 4 | ERIC REALTY INC | ERIC REALTY, INC. | 4B196800006 | 12 | 0 |
| 4 | GOLDEN STATE WATER COMPANY - SAN DIMAS | OJAI SYSTEM | 4A566300096 | 12 | 0 |
| 4 | WESTLAKE LAKE MANAGEMENT ASSOCIATION | WESTLAKE WELL | 4A567600031 | 12 | 0 |
| 4 | BEVERLY HILLS CITY | BEVERLY RO TREATMENT PLANT | 4B196100114 | 11 | 0 |
| 4 | DOLE FOOD CO INC | WESTLAKE VILLAGE HOTEL & SPA | 4B197500021 | 11 | 0 |
| 4 | DOUGLAS EMMETT WARNER CENTER TOWER | PLAZA 6, WARNER CENTER | 4B196000389 | 11 | 0 |
| 4 | LOS ANGELES CNTY, PARKS & REC | VAL VERDE CO. PARK SWIM POOL | 4A190107086 | 11 | 7 |
| 4 | MORTON SALT/ROHM AND HAAS | MORTON SALT - LONG BEACH | 4B192543001 | 11 | 0 |
| 4 | TRAMMELL CROW RESIDENTIAL | UNIVERSAL CITY APARTMENTS HOLDING LLC | 4B197500053 | 11 | 0 |
| 4 | DOUGLAS EMMETT & CO | TRILLIUM - 6320 CANOGA AVENUE | 4B196000398 | 10 | 0 |
| 4 | LOS ANGELES CNTY SANITATION DISTRICTS | JWPCP, CARSON | 4B190107013 | 10 | 10 |
| 4 | LOS ANGELES DWP | HARBOR GENERATING STATION | 4B193500004 | 10 | 9 |
| 4 | METROPOLITAN WATER DISTRICT OF SOUTHERN | FOOTHILL FEEDER POWER PLANT | 4A190115006 | 10 | 0 |
| 4 | G & M OIL CO. | G & M OIL CO STATION #57 | 4B196600183 | 9 | 0 |
| 4 | GOLDEN WEST REFINING COMPANY | SANTA FE SPRINGS REFINERY | 4B192162001 | 9 | 9 |

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|-----------------|---|---|-------------|---|---|
| 4 | MOLE-RICHARDSON COMPANY | MOLE-RICHARDSON COMPANY | 4B196100116 | 9 | 0 |
| 4 | RMR PROPERTIES | RMR PROPERTIES | 4B191086001 | 9 | 7 |
| 4 | VILLA MARINA EAST V CONDOMINIUM ASSOC. | VILLA MARINA EAST V HOA | 4B196000402 | 9 | 0 |
| 4 | BP WEST COAST PRODUCT LLC | BP CARSON REFINERY | 4B192010008 | 8 | 0 |
| 4 | DIAL CORP, THE | SOUTHWEST GREASE BUSINESS | 4B192545001 | 8 | 0 |
| 4 | DOUGLAS EMMETT WARNER CENTER TOWER | PLAZA 3, WARNER CENTER | 4B196000313 | 8 | 0 |
| 4 | EDINGTON OIL CO. | LONG BEACH REFINERY - RAINFALL | 4B192326003 | 8 | 0 |
| 4 | EXXONMOBIL OIL CORPORATION | TORRANCE REFINERY | 4B192079002 | 8 | 0 |
| 4 | HITCO CARBON COMPOSITES, INC. | HITCO/DEFENSE PROD DIV, | 4B192128001 | 8 | 8 |
| 4 | HOME DEPOT USA INC | FORMER ITT AEROSPACE CONTROLS | 4B192623001 | 8 | 0 |
| 4 | KINDER MORGAN SFPP, L.P. | NORWALK PUMP STATION | 4B192597001 | 8 | 0 |
| 4 | LOS ANGELES DWP | HARBOR G.S MARINE TANK FARM | 4B190106046 | 8 | 0 |
| 4 | LOS ANGELES UNIFIED SCHOOL DISTRICT | VISTA HERMOSA PROJECT | 4B197500184 | 8 | 0 |
| 4 | LUBRICATING SPECIALTIES COMPANY | PICO RIVERA FACILITY | 4B192127001 | 8 | 0 |
| 4 | MANTINI MANAGEMENT, INC. | DETROIT APARTMENTS | 4B196000256 | 8 | 0 |
| 4 | VOPAK TERMINAL LONG BEACH INC | VOPAK TERMINAL LONG BEACH INC. | 4B192614001 | 8 | 1 |
| 4 | WESTWAY TERMINAL COMPANY | WESTWAY TERMINAL- BERTHS 70-71 | 4B192407001 | 8 | 0 |
| 4 | BEVERLY HILLS CITY | SITE "A" SOUTH PARKING STRUCTURE | 4B196000356 | 7 | 0 |
| 4 | LONG BEACH WATER DEPT | LONG BEACH DESALINATION RESEARCH FACILIT | 4B190105019 | 7 | 0 |
| 4 | LOS ANGELES DWP | TANK E AREA, HAYNES PLT, LB | 4B190106049 | 7 | 0 |
| 4 | MANOUCHEHER BENJY | LAUREL WAY PROJECT | 4B197500072 | 7 | 0 |
| 4 | REDMAN EQUIPMENT & MFG CO | REDMAN EQUIPMENT & MFG CO | 4B192090001 | 7 | 3 |
| 4 | RELIANT ENERGY MANDALAY, LLC | MANDALAY GENERATING STATION | 4A562019001 | 7 | 0 |
| 4 | SANTA CLARITA CITY | SEGMENT C - MAGIC MOUNTAIN PARKWAY/I-5 O | 4A197500172 | 7 | 0 |
| 4 | WILROAD ASSOCIATES C/O HINES | WILSHIRE RODEO PLAZA | 4B196000355 | 7 | 0 |

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|-----------------|--|---|-------------|---|---|
| 4 | WILSHIRE LE DOUX MEDICAL PLAZA LP | WILSHIRE LE DOUX MEDICAL PLAZA PROJECT | 4B197500152 | 7 | 0 |
| 4 | 4201 WILSHIRE, LLC | HARBOR ASSOCIATES | 4B191083001 | 6 | 0 |
| 4 | ANACAPA MARINE SERVICES | ANACAPA MARINE SERVICES | 4A562442001 | 6 | 6 |
| 4 | BP WILMINGTON CALCINER | BP WILMINGTON PLANT | 4B192208003 | 6 | 2 |
| 4 | CASDEN PARK LA BREA A LLC | PARK LA BREA, PARCEL A | 4B196100055 | 6 | 0 |
| 4 | CONOCOPHILLIPS COMPANY | LA REFINERY, CARSON PLANT | 4B192131026 | 6 | 0 |
| 4 | LA CO SANITATION DIST | SAN JOSE CREEK WWRP | 4B190107020 | 6 | 0 |
| 4 | LB/L-SUNCAL MANDALAY, LLC | WESTPORT AT MANDALAY BAY | 4A562445001 | 6 | 0 |
| 4 | LEGACY PARTNERS II LB WORLD TRADE, LLC | ONE WORLD TRADE CENTER | 4B197500208 | 6 | 0 |
| 4 | LOS ANGELES CNTY SANITATION DISTRICTS | WHITTIER NARROWS WWRP | 4B190107016 | 6 | 0 |
| 4 | LOS ANGELES DWP | OLYMPIC TANK FARM SKIM POND | 4B190106051 | 6 | 0 |
| 4 | LOS ANGELES DWP | TANK F,G AREA,HAYNES PLT, LB | 4B190106050 | 6 | 0 |
| 4 | SANTA CLARITA CITY | EMERGENCY DEWATERING | 4A567500069 | 6 | 0 |
| 4 | SHELL OIL PRODUCT US | MORMON ISLAND MARINE TERMINAL | 4B192108009 | 6 | 3 |
| 4 | SHELL OIL PRODUCT US | SIGNAL HILL TERMINAL (GROUNDWATER REMEDI | 4B196600025 | 6 | 0 |
| 4 | STELLAR BIOTECHNOLOGIES INC | PORT HUENEME AQUACULTURE PARK | 4B191309001 | 6 | 0 |
| 4 | ULTRAMAR, INC HANFORD | MARINE TERMINAL, BERTH 164 | 4B192023002 | 6 | 0 |
| 4 | VENTURA CO WATERSHED PROTECTION DISTRICT | HUENEME DRAIN PUMP STATION | 4A567500012 | 6 | 0 |
| 4 | WATER REPLENISHMENT DISTRICT OF SOUTHERN | SEPULVEDA WELL NO. 1 & 2 | 4B197600051 | 6 | 0 |
| 4 | CALIFORNIA SULPHUR CO | SULFUR PELLETIZING, WILMINGTON | 4B192143001 | 5 | 0 |
| 4 | PETRO DIAMOND TERMINAL COMPANY | MARINE TERMINAL, BERTH 83, LONG BEACH | 4B192197001 | 5 | 0 |
| 4 | VENTURA COUNTY WATERSHED PROTECTION DIST | SANTA CLARA RIVER GROINS UPGRADE PHASE 1 | 4A567500086 | 5 | 0 |
| 4 | ALAMEDA CORRIDOR TRANSPORTATION AUTHORIT | ALAMEDA MID-CORRIDOR TRENCH PJ | 4B191340001 | 4 | 4 |
| 4 | ARDEN REALTY L. P. | NEW WILSHIRE BUILDING | 4B196000362 | 4 | 0 |

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|-----------------|---|---------------------------------------|-------------|---|---|
| 4 | ARDEN REALTY L. P. | WILSHIRE-SAN VICENTE PLAZA | 4B196000620 | 4 | 0 |
| 4 | CEMEX CONSTRUCTION MATERIALS LP | CEMEX (MOORPARK PLANT) | 4A562022001 | 4 | 0 |
| 4 | CWD CLOVERDALE II ASSOCIATES | 328 CLOVERDALE APARTMENTS | 4B196000242 | 4 | 0 |
| 4 | EL SEGUNDO POWER, L.L.C. | EL SEGUNDO GENERATING STATION | 4B192111001 | 4 | 0 |
| 4 | FAIRCHILD HOLDING CORP. | VOI-SHAN REDONDO BEACH | 4B192525001 | 4 | 0 |
| 4 | FOREST LAWN MEMORIAL PARK | WELL NO. 2A | 4B197600005 | 4 | 0 |
| 4 | LOS ANGELES DWP | TANK H, J AREA, HAYNES PLT. LB | 4B190106042 | 4 | 1 |
| 4 | LOS ANGELES DWP | TUNNEL # 105 | 4B190106099 | 4 | 4 |
| 4 | M & H PROPERTY MANAGEMENT | VILLA MARINA MARKET PLACE | 4B196100069 | 4 | 0 |
| 4 | TESORO PETROLEUM COMPANIES, INC. | TESORO-LA MIRADA SITE | 4B197500064 | 4 | 0 |
| 4 | TOPA MANAGEMENT CORP. | GATEWAY EAST OFFICE BLDG, LA | 4B196000350 | 4 | 0 |
| 4 | US BORAX INC. | WILMINGTON PLANT | 4B192129002 | 4 | 0 |
| 4 | BP WEST COAST PRODUCT LLC | MARINE TERMINAL #3 | 4B196300136 | 3 | 0 |
| 4 | COLTEC INDUSTRIES INC. | FORMER MENASCO AEROSYSTEM FACILITY | 4B191318001 | 3 | 2 |
| 4 | CONSOLIDATED DRUM RECONDITIONING | OIL DRUM RECYCLING, SOUTH GATE | 4B192178001 | 3 | 0 |
| 4 | ELIXIR INDUSTRIES | ELIXIR INDUSTRIES | 4B192575001 | 3 | 0 |
| 4 | GOLDEN STATE WATER COMPANY - SAN DIMAS | DOTY WELLS #1 & #2 | 4B196000631 | 3 | 0 |
| 4 | GOLDEN STATE WATER COMPANY - SAN DIMAS | DOTY WELLS SITE FILTRATION UNIT | 4B198100008 | 3 | 0 |
| 4 | GOLDRICH & KEST MANAGEMENT CO. | MUSEUM TERRACE APARTMENT | 4B196000339 | 3 | 0 |
| 4 | GOULD'S PUMPS, INC. | GOULD'S PUMPS, INC. | 4B196300092 | 3 | 0 |
| 4 | HARSU GAS MART | HARSU GAS MART | 4B197500068 | 3 | 0 |
| 4 | HR TEXTRON INC. | VALENCIA FACILITY | 4A192332001 | 3 | 1 |
| 4 | LAXFUEL CORPORATION | LAXFUEL CORPORATION | 4B196800059 | 3 | 0 |
| 4 | LINCOLN AVENUE WATER CO. | SOUTH COULTER WATER TREATMENT | 4B191300001 | 3 | 0 |
| 4 | LOS ANGELES CITY PARKS & RECREATION | LOS ANGELES ZOO GRIFFITH PARK | 4B190106036 | 3 | 0 |

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|-----------------|---|--|-------------|---|---|
| 4 | LOS ANGELES COUNTY FAIR, HOTEL & EXPO CO | FAIRPLEX | 4B190144001 | 3 | 0 |
| 4 | MALIBU CITY | BIG ROCK MESA DRAINAGE FACILITY | 4B190107098 | 3 | 0 |
| 4 | MERCURY CASUALTY COMPANY | HOME OFFICE BUILDING | 4B196000332 | 3 | 0 |
| 4 | METROPOLITAN STEVEDORE | METROPOLITAN STEVEDORE CO. | 4B192078001 | 3 | 0 |
| 4 | MONTROSE CHEMICAL CORP OF CALIFORNIA | MONTROSE CHEMICAL CORP OF CALIFORNIA | 4B197500040 | 3 | 0 |
| 4 | NORTHROP GRUMMAN SP & MSN INC. | SPACE PARK FACILITY | 4B192557003 | 3 | 3 |
| 4 | PNEUMO ABEX AEROSPACE, INC. | PNEUMO ABEX AEROSPACE CORP. | 4A561058001 | 3 | 2 |
| 4 | SIX FLAGS MAGIC MOUNTAIN | PARKING LOT RECLAMATION AND SANTA CLARA | 4A197500185 | 3 | 0 |
| 4 | SOUTHERN CALIFORNIA EDISON - ROSEMEAD | PEBBLY BEACH DESALINATION PLANT | 4B192111010 | 3 | 0 |
| 4 | STELLAR BIOTECHNOLOGIES INC | STELLAR BIOTECHNOLOGIES INC | 4A565022002 | 3 | 0 |
| 4 | WORLD OIL MARKETING CO. | WORLD OIL STATION #20 (FORMER) | 4B196600167 | 3 | 0 |
| 4 | 3M CO., EHS OPERATIONS | 3M PHARMACEUTICALS | 4B192594001 | 2 | 0 |
| 4 | ARAMIS VARTANIAN MR. & MRS. | MAGIC GAS & AUTO SERVICE | 4B196600197 | 2 | 0 |
| 4 | CALIFORNIA DAIRIES INC | CALIFORNIA DAIRIES INC. | 4B192454001 | 2 | 0 |
| 4 | CAMROSA WATER DISTRICT | CAMROSA WWRP | 4A560106003 | 2 | 0 |
| 4 | CERTIFIED ALLOY PRODUCTS, INC. | CERTIFIED ALLOY PRODUCTS, INC. | 4B196400064 | 2 | 0 |
| 4 | CONOCOPHILLIPS COMPANY | 76 STATION #3768 | 4B196600151 | 2 | 0 |
| 4 | CONOCOPHILLIPS COMPANY | UNOCAL SS #1715 | 4B196600075 | 2 | 0 |
| 4 | COVINA IRRIGATING CO. | TREATMENT PLANT #1 | 4B192526001 | 2 | 0 |
| 4 | DOUGLAS EMMETT & CO | CENTURY PARK PLAZA | 4B196000514 | 2 | 0 |
| 4 | EXXONMOBIL OIL CORPORATION | MOBIL SS#18-LDM | 4B192079026 | 2 | 0 |
| 4 | FUEL CONTROLS INC. | FUEL CONTROLS INC LONG BEACH | 4B196600173 | 2 | 0 |
| 4 | HONEYWELL INC. | HONEYWELL INC. | 4B191263001 | 2 | 0 |
| 4 | HOOD CORPORATION | WHITTIER YARD (HOOD CORPORATION) | 4B196600199 | 2 | 0 |
| 4 | INTERACTIVE CORP. | TICKETMASTER BUILDING | 4B196000388 | 2 | 0 |
| 4 | LOS ANGELES CITY, BUREAU OF SANITATION | HYPERION WWTP | 4B190106002 | 2 | 0 |

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|-----------------|---|--|-------------|---|---|
| 4 | LOS ANGELES CITY, BUREAU OF SANITATION | TERMINAL ISLAND WWTP | 4B190106005 | 2 | 0 |
| 4 | LOS ANGELES CNTY SANITATION DISTRICTS | LONG BEACH WWRP | 4B190107014 | 2 | 0 |
| 4 | LOS ANGELES COUNTY DPW | HOLLYHILLS DRAIN UNIT 8B- PH 1 | 4B197500015 | 2 | 0 |
| 4 | MONTEREY PARK CITY | DELTA PLANT | 4B196800061 | 2 | 0 |
| 4 | MR. AUTO | MR. AUTO | 4B197500060 | 2 | 0 |
| 4 | PASADENA, CITY OF | DEPT OF WATER & POWER | 4B190138001 | 2 | 2 |
| 4 | PLASKOLITE WEST, INC. | PLASKOLITE WEST INC. | 4B192533001 | 2 | 0 |
| 4 | PLAYA CAPITAL CO LLC | PLAYA VISTA SITE | 4B196800049 | 2 | 0 |
| 4 | RELIANT ENERGY MANDALAY, LLC | ORMOND BEACH GENERATING STATION | 4A562019002 | 2 | 1 |
| 4 | SANTA CLARITA CITY | SEGMENT B - MAGIC MOUNTAIN PARKWAY @ I-5 | 4A197500171 | 2 | 0 |
| 4 | SSR WESTERN MULTIFAMILY LLC | SEACASTLE APARTMENTS | 4B196400067 | 2 | 0 |
| 4 | ST. VINCENT HOSPITAL | S. MARK TAPER FOUNDATION TRANSPLANT CENT | 4B196000053 | 2 | 0 |
| 4 | TELEFLEX INC. | THE TALLEY SITE, NEWBURY PARK | 4A562397002 | 2 | 0 |
| 4 | UNIVAR USA INC. | FORMER VOPAK USA INC. | 4B196800038 | 2 | 0 |
| 4 | VENOCO INC. | EMMA WOOD STATE BEACH CRUDE OIL PIPELINE | 4A567500235 | 2 | 0 |
| 4 | WILSHIRE HOME OWNERS ASSOC. | THE WILSHIRE | 4B196000367 | 2 | 0 |
| 4 | 1801 AVENUE OF THE STARS LP | OFFICE BUILDING | 4B191067001 | 1 | 0 |
| 4 | B. N. Y. CALIFORNIA INC. | B. N. Y. CALIFORNIA INC | 4B196000016 | 1 | 0 |
| 4 | BP WEST COAST PRODUCT LLC | HATHAWAY TERMINAL TANK FARM | 4B192187001 | 1 | 0 |
| 4 | BP WEST COAST PRODUCT LLC | MARINE TERMINAL 1,BERTH 121,LB | 4B192010015 | 1 | 1 |
| 4 | CALCLEAN INC. | GP RESOURCES FACILITY (FORMER) | 4A566600200 | 1 | 0 |
| 4 | CAMARILLO CITY | WELLS A & B | 4A567600035 | 1 | 0 |
| 4 | CASTAIC LAKE WATER AGENCY | PIPELINE REPLACEMENT PROJECT | 4A197500067 | 1 | 0 |
| 4 | CSU LOS ANGELES | PARKING STRUCTURE 3 | 4B197500176 | 1 | 0 |
| 4 | CULLIGAN INDUSTRIAL WATER TREA | PURETEC HARRIS INDUSTRIAL WATER | 4A562432001 | 1 | 0 |
| 4 | DOUGLAS EMMETT, LLC | BRIGHTON ENTERPRISES | 4B196000601 | 1 | 0 |

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|-----------------|---|---|-------------|---|---|
| 4 | EXXONMOBIL OIL CORPORATION | FORMER EXXONMOBIL SS#7- 2827 | 4A566600191 | 1 | 0 |
| 4 | EXXONMOBIL OIL CORPORATION | SOUTHWEST TERMINAL AREA I | 4B192079001 | 1 | 1 |
| 4 | FEREIDOUN & SUSAN DAFTARY | HUNTLEY DRIVE APARTMENT | 4B196000283 | 1 | 0 |
| 4 | GEORGE & ERIKA KABOR FAMILY TR | LA CIENEGA CENTER | 4B196100025 | 1 | 0 |
| 4 | GOLDEN STATE WATER COMPANY | DRINKING WELL-BALLONA PLANT | 4B197600007 | 1 | 0 |
| 4 | GOLDEN STATE WATER COMPANY - SAN DIMAS | GOLDMEDAL PLANT | 4B196400037 | 1 | 0 |
| 4 | INTERSTATE BRANDS CORP | INTERSTATE BRANDS | 4B196600103 | 1 | 0 |
| 4 | ISLAND ENVIRONMENTAL SERVICES | 110-105 FREEWAY INTERCHANGE STORM WATER | 4B197500191 | 1 | 0 |
| 4 | KEYSOR-CENTURY CORP | PVC-PVA COPOLYMER MFG, SAUGUS | 4A192000001 | 1 | 1 |
| 4 | KINDER MORGAN (FORMER GATX) | LOS ANGELES HARBOR TERMINAL | 4B192238001 | 1 | 0 |
| 4 | LAKEWOOD CITY | ARBOR YARD WELL NO. 27 | 4B197600048 | 1 | 0 |
| 4 | LOS ANGELES CITY, BUREAU OF SANITATION | LA-GLENDALE WWRP | 4B190106001 | 1 | 0 |
| 4 | LOS ANGELES CNTY DPW | HOLLYHILLS DRAIN UNIT 8 | 4B196000575 | 1 | 0 |
| 4 | LOS ANGELES COUNTY DPW | AGOURA ROAD MAINTENANCE YARD | 4A197500049 | 1 | 0 |
| 4 | LOS ANGELES DWP | STONE HOLLYWOOD TRUNK LINE - 4 | 4B196000470 | 1 | 0 |
| 4 | LOS ANGELES DWP | TUNNEL NO. 104 | 4B190106061 | 1 | 0 |
| 4 | MAPLE ASSOCIATES, LTD | 407 NORTH MAPLE DRIVE | 4B196000544 | 1 | 0 |
| 4 | METROPOLITAN WATER DISTRICT OF SOUTHERN | GREG AVENUE POWER PLANT | 4B196400029 | 1 | 0 |
| 4 | MONTEREY PARK CITY | DELTA PLANT WELL NO. 5 | 4B196800062 | 1 | 0 |
| 4 | ONE HUNDRED TOWERS LLC | CENTURY PLAZA TOWERS, OFFICES | 4B196000408 | 1 | 0 |
| 4 | OWENS-BROCKWAY GLASS CONTAINER | GLASS CONTAINER DIV, VERNON | 4B192085002 | 1 | 0 |
| 4 | PACIFIC REFINING CO. | FORMER WESTERN FUEL OIL | 4B191311001 | 1 | 0 |
| 4 | PARAMOUNT PICTURES INC. | MARATHON OFFICE BUILDING | 4B196000077 | 1 | 0 |
| 4 | PLEASANT VALLEY RECREATION & PARK DISTRI | FREEDOM PARK | 4A566600155 | 1 | 0 |
| 4 | SANTA CLARITA CITY | SEGMENT D - MAGIC MOUNTAIN PARKWAY @ I-5 | 4A197500173 | 1 | 0 |

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|-----------------|------------------------------------|---|-------------|---|---|
| 4 | SHELL OIL PRODUCT US | LOS ANGELES REFINERY | 4B192121001 | 1 | 0 |
| 4 | SHORE TERMINAL LLC | WILMINGTON MARINE TERMINAL | 4B192263001 | 1 | 1 |
| 4 | SOUTHERN CA. MARINE INSTITUTE | SOUTHERN CALIFORNIA MARINE INSTITUTE | 4B191035001 | 1 | 0 |
| 4 | TESORO PETROLEUM | TARGET STORE 290 | 4B196800023 | 1 | 0 |
| 4 | THE KUTZER COMPANY | SANTA MONICA GATEWAY | 4B196000129 | 1 | 0 |
| 4 | THE NEWHALL LAND AND FARMING CO | SEGMENT E OF VALENCIA COMMERCE CENTER P | 4A197500121 | 1 | 0 |
| 4 | THE NEWHALL LAND AND FARMING CO | SEGMENT A OF VALENCIA COMMERCE CENTER PR | 4A197500117 | 1 | 0 |
| 4 | THE NEWHALL LAND AND FARMING CO | SEGMENT B OF VALENCIA COMMERCE CENTER PR | 4A197500118 | 1 | 0 |
| 4 | THE NEWHALL LAND AND FARMING CO | SEGMENT C OF VALENCIA COMMERCE CENTER PR | 4A197500119 | 1 | 0 |
| 4 | THE NEWHALL LAND AND FARMING CO | SEGMENT D OF VALENCIA COMMERCE CENTER PR | 4A197500120 | 1 | 0 |
| 4 | THE NEWHALL LAND AND FARMING CO | SEGMENT F OF VALENCIA COMMERCE CENTER PR | 4A197500140 | 1 | 0 |
| 4 | THE NEWHALL LAND AND FARMING CO | SEGMENT G OF VALENCIA COMMERCE CENTER PR | 4A197500141 | 1 | 0 |
| 4 | THE NEWHALL LAND AND FARMING CO | SEGMENT H OF VALENCIA COMMERCE CENTER PR | 4A197500142 | 1 | 0 |
| 4 | THE NEWHALL LAND AND FARMING CO | SEGMENT I OF VALENCIA COMMERCE CENTER PR | 4A197500143 | 1 | 0 |
| 4 | THE NEWHALL LAND AND FARMING CO | SEGMENT J OF VALENCIA COMMERCE CENTER PR | 4A197500144 | 1 | 0 |
| 4 | THE NEWHALL LAND AND FARMING CO | SEGMENT K OF VALENCIA COMMERCE CENTER PR | 4A197500122 | 1 | 0 |
| 4 | THE NEWHALL LAND AND FARMING CO | SEGMENT L OF VALENCIA COMMERCE CENTER PR | 4A197500123 | 1 | 0 |
| 4 | THE NEWHALL LAND AND FARMING CO | SEGMENT M OF VALENCIA COMMERCE CENTER PR | 4A197500124 | 1 | 0 |
| 4 | THE NEWHALL LAND AND FARMING CO | SEGMENT N OF VALENCIA COMMERCE CENTER PR | 4A197500125 | 1 | 0 |
| 4 | THE NEWHALL LAND AND FARMING CO | SEGMENT O OF VALENCIA COMMERCE CENTER PR | 4A197500126 | 1 | 0 |

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|-----------------|---|---|---------------------|---|---|
| 4 | THE NEWHALL LAND AND FARMING CO | SEGMENT P OF VALENCIA COMMERCE CENTER PR | 4A197500127 | 1 | 0 |
| 4 | THE NEWHALL LAND AND FARMING CO | SEGMENT Q OF VALENCIA COMMERCE CENTER PR | 4A197500128 | 1 | 0 |
| 4 | THE NEWHALL LAND AND FARMING CO | SEGMENT R OF VALENCIA COMMERCE CENTER PR | 4A197500129 | 1 | 0 |
| 4 | THE NEWHALL LAND AND FARMING CO | SEGMENT S OF VALENCIA COMMERCE CENTER PR | 4A197500130 | 1 | 0 |
| 4 | TRW INC. | NORTHROP GRUMMAN CORP-HAWTHORNE SITE | 4B192557002 | 1 | 0 |
| 4 | U.S. GYPSUM CO. | U.S. GYPSUM CO. | 4B191287001 | 1 | 0 |
| 4 | UNOCAL CORP | FORMER UNOCAL STATION #6990 | 4B197500251 | 1 | 0 |
| 4 | VENTURA CNTY WATERSHED PROTECTION DIST | SANTA PAULA AIRPORT & SANTA CLARA RIVER | 4A567500091 | 1 | 0 |
| 4 | WALNUT PARK MUTUAL WATER CO. | WELL #11 & #12 | 4B196000437 | 1 | 0 |
| 4 | WASHINGTON MUTUAL | SHERMAN OAKS BRANCH | 4B196000144 | 1 | 0 |
| 4 | WATER REPLENISHMENT DISTRICT OF SOUTHERN | DOMINGUEZ GAP BARRIER PROJECT-QUARTERLY | 4B197600050 | 1 | 0 |
| 4 | AIMCO | VILLAS AT PARK LA BREA | 4B196100042 | 0 | 0 |
| 4 | ARYA INVESTMENTS, LLC | WILSHIRE WEST EXECUTIVE CENTER | 4B196000422 | 0 | 0 |
| 4 | CITY OF SANTA CLARITA | BOUQUET CANYON BRIDGE WIDENING | 4A197500007 | 0 | 0 |
| 4 | EQUILON ENT. LLC DBA SHELL OIL | SHELL SERVICE STATION | 4B196600150 | 0 | 0 |
| 4 | EXXONMOBIL OIL CORPORATION | FORMER EXXON STATION 7- 7221 | 4B196600130 | 0 | 0 |
| 4 | G & M OIL CO. | G&M OIL CO. STATION #23 | 4B196600156 | 0 | 0 |
| 4 | HPG MANAGEMENT | HANCOCK PARK PLACE APTS | 4B196100005 | 0 | 0 |
| 4 | RALPHS GROCERY CO. | RALPHS GROCERY CO. STORE #289 | 4B196000137 | 0 | 0 |
| 4 | TERRA VAC CORPORATION | CARSON PLAZA-NAT'S CLEANERS | 4B196800055 | 0 | 0 |
| 4 | WILSHIRE BORGATA OWNER ASSOCIATION | WILSHIRE BORGATA CONDOMINIUMS | 4B196000161 | 0 | 0 |
| 4 | WORLD OIL MARKETING CO. | WORLD OIL STATION #62 (CLEANUP) | 4B196800054 | 0 | 0 |
| | | | REGION TOTAL | 758 | 526 |

| Regional Office | AGENCY | FACILITY | WDID | MMP Violations (Includes both confirmed and alleged MMP violations) | Violations Receiving Penalty (Does not include pending Penalties) |
|-----------------|--|-----------------------------------|---------------------|---|---|
| 5F | MALAGA CWD | MALAGA CWD WWTF | 5D100124001 | 528 | 522 |
| 5F | CALIFORNIA DAIRIES, INC | TIPTON MILK & BUTTER PROC FAC | 5D541067001 | 274 | 0 |
| 5F | PLANADA CSD | PLANADA WWTF | 5C240110001 | 113 | 113 |
| 5F | VALLEY WASTE DISPOSAL CO | CAWELO RESERVOIR B | 5D152013001 | 56 | 0 |
| 5F | MERCED, CITY OF | CITY OF MERCED WWTF | 5C240108001 | 26 | 21 |
| 5F | ATWATER, CITY OF | ATWATER WWTF | 5C240100001 | 22 | 22 |
| 5F | BERRY PETROLEUM COMPANY | MCVAN AREA POSO CREEK OIL FLD | 5D152202001 | 22 | 0 |
| 5F | VALLEY GOLD, LLC | GUSTINE CHEESE PRC FACILITY | 5C242033002 | 17 | 0 |
| 5F | CALIFORNIA DAIRIES, INC | LOS BANOS FOODS, INC | 5C245017001 | 15 | 0 |
| 5F | SOUTHERN CALIFORNIA EDISON - ROSEMEAD | BIG CREEK POWERHOUSE NO 1 | 5C102009001 | 12 | 0 |
| 5F | ROCKWELL INTERNATIONAL | ROCKWELL INTERNATIONAL C/O GEO | 5D542095001 | 6 | 0 |
| 5F | CA DEPT OF FISH & GAME FRESNO | MERCED RIVER FISH HATCHERY | 5C240804001 | 3 | 0 |
| 5F | VISALIA, CITY OF | VISALIA WWTF | 5D540113001 | 3 | 0 |
| 5F | CALMAT OF CENTRAL CALIF | SANGER PLANT | 5D102010001 | 2 | 0 |
| 5F | GRIFFIN RESOURCES | MOUNT POSO, POSCAL PAC VILLARD | 5D152028001 | 2 | 0 |
| 5F | MARIPOSA PUD | MARIPOSA WWTP | 5C221012001 | 2 | 0 |
| 5F | AAF-MCQUAY, INC | VISALIA CLEANUP- SYNDERGENERAL | 5D542001002 | 1 | 0 |
| 5F | CALAVERAS TROUT FARM, INC | TROUT REARING FACILITY | 5C242001001 | 1 | 0 |
| 5F | ENNIS HOMES | EAGLE RNCH | 5F15C326135 | 1 | 0 |
| 5F | SOUTHERN CALIFORNIA EDISON - ROSEMEAD | BALSAM MEADOWS HYDRO PROJ | 5C102009007 | 1 | 0 |
| 5F | KRAFT FOODS, INC | KRAFT FOODS, INC | 5D542010001 | 0 | 0 |
| | | | REGION TOTAL | 1107 | 678 |

| Regional Office | AGENCY | FACILITY | WDID | MMP Violations (Includes both confirmed and alleged MMP violations) | Violations Receiving Penalty (Does not include pending Penalties) |
|-----------------|---|--|---------------------|---|---|
| 5R | BIGGS, CITY OF | BIGGS WWTP | 5A040100001 | 30 | 30 |
| 5R | WILLOWS, CITY OF | WILLOWS WWTP | 5A110101001 | 14 | 0 |
| 5R | CITY OF CHICO | CHICO WATER POLLUTION CONTROL PLANT | 5A040102001 | 13 | 13 |
| 5R | MINING REMEDIAL RECOVERY CO | MAMMOTH,SUTRO,KEYSTON E ET AL | 5A459006001 | 10 | 0 |
| 5R | QUINCY COMMUNITY SERVICES DISTRICT | QUINCY WWTP & COLLECTION SYSTEM | 5A320103001 | 7 | 4 |
| 5R | MILLENNIUM HOLDINGS LLC | BULLY HILL & RISING STAR MINES | 5A459002001 | 6 | 0 |
| 5R | COLLINS PINE COMPANY | COLLINS PINE CHESTER SAWMILL | 5A322000001 | 5 | 5 |
| 5R | PORTOLA CITY | PORTOLA WWTP | 5A320102001 | 5 | 5 |
| 5R | RED BLUFF CITY | RED BLUFF WW RECLAMATION PLANT | 5A520101001 | 4 | 4 |
| 5R | SIERRA PACIFIC INDUSTRIES QUINCY | SIERRA PACIFIC INDUSTRIES QUINCY DIVISIO | 5A321016001 | 4 | 3 |
| 5R | HOLLY TREE RANCH DEVELOPMENT | GREENHORN MINE | 5A459010001 | 3 | 0 |
| 5R | REDDING CITY | CLEAR CREEK WWTP | 5A450103001 | 3 | 3 |
| 5R | SIERRA PACIFIC INDUSTRIES BURNEY R5R | SIERRA PACIFIC INDUSTRIES BURNEY DIVISIO | 5A452015001 | 3 | 0 |
| 5R | LEHIGH SOUTHWEST CEMENT CO R | LEHIGH SOUTHWEST CEMENT CO MOUNTAIN GATE | 5A452008001 | 2 | 0 |
| 5R | STIMPEL-WIEBELHAUS ASSOCIATES | SWA MOUNTAIN GATE LIMESTONE QUARRY | 5A452049001 | 2 | 0 |
| 5R | ANDERSON CITY | ANDERSON WPCP | 5A450100001 | 1 | 1 |
| 5R | SHASTA LAKE CITY | SHASTA LAKE WWTF | 5A450105001 | 1 | 0 |
| | | | REGION TOTAL | 113 | 68 |

| Regional Office | AGENCY | FACILITY | WDID | MMP Violations (Includes both confirmed and alleged MMP violations) | Violations Receiving Penalty (Does not include pending Penalties) |
|-----------------|--|---|-------------|---|---|
| 5S | RIO VISTA CITY | TRILOGY WWTP/NORTHWEST WWTP | 5A480108001 | 499 | 7 |
| 5S | LIVE OAK, CITY OF | CITY OF LIVE OAK WWTP | 5A510100001 | 296 | 293 |
| 5S | COLFAX CITY | COLFAX WWTP | 5A310101001 | 236 | 111 |
| 5S | MANTECA CITY | MANTECA WW QUALITY CONTROL FAC | 5B390104001 | 227 | 148 |
| 5S | NEVADA CNTY SANITATION DISTRICT | CASCADE SHORES WWTP | 5A290107002 | 190 | 157 |
| 5S | CANADA COVE L.P. | FRENCH CAMP GOLF & RV PARK | 5B391077001 | 185 | 0 |
| 5S | UNITED AUBURN INDIAN COMMUNITY | AUBURN RANCHERIA CASINO WWTP | 5A31NP00001 | 159 | 158 |
| 5S | PLACER COUNTY DEPT OF FACILITY SERVICES | SA NO 28, ZONE NO.6 | 5A310104011 | 151 | 95 |
| 5S | WEST SACRAMENTO CITY | WEST SACRAMENTO STP | 5B570103001 | 145 | 2 |
| 5S | COLUSA, CITY OF | COLUSA WWTP | 5A060101001 | 99 | 12 |
| 5S | BRENTWOOD CITY | BRENTWOOD WWTP | 5B070101001 | 93 | 93 |
| 5S | GALT CITY | GALT SD | 5B340101001 | 90 | 0 |
| 5S | DISCOVERY BAY TOWN | DISCOVERY BAY TRMT PLANT | 5B070105003 | 89 | 70 |
| 5S | DONNER SUMMIT PUBLIC UTILITY | DONNER SUMMIT WWTP | 5A290105001 | 77 | 73 |
| 5S | NEVADA CNTY SANITATION DISTRICT | LAKE WILDWOOD WWTP | 5A290104001 | 75 | 0 |
| 5S | PLACER COUNTY DEPT OF FACILITY SERVICES | PLACER CNTY SMD NO 1 WWTP | 5A310104007 | 74 | 4 |
| 5S | WILLIAMS CITY | WILLIAMS WWTP | 5A060103001 | 73 | 0 |
| 5S | PLACERVILLE CITY | HANGTOWN CREEK WWTP | 5A090100001 | 68 | 3 |
| 5S | ROSEVILLE CITY | PLEASANT GROVE WWTP | 5A310106007 | 64 | 18 |
| 5S | CA DEPT OF CORRECTIONS- DEUEL | DEUEL VOCATNL INST. STP | 5B390100001 | 60 | 38 |
| 5S | VACAVILLE CITY | EASTERLY STP | 5A480105002 | 45 | 27 |
| 5S | SACRAMENTO CNTY AIRPORT | SACRAMENTO INTERNATIONAL AIRPT | 5A34NP00004 | 41 | 27 |
| 5S | RIO VISTA CITY | RIO VISTA WWTF | 5A480104001 | 35 | 15 |
| 5S | TURLOCK CITY | TURLOCK WWTP | 5C500108001 | 34 | 0 |
| 5S | LODI CITY | WHITE SLOUGH WATER POLLUTION CONTROL FAC | 5B390103002 | 33 | 2 |

| Regional Office | AGENCY | FACILITY | WDID | MMP Violations (Includes both confirmed and alleged MMP violations) | Violations Receiving Penalty (Does not include pending Penalties) |
|-----------------|--|--|-------------|---|---|
| 5S | NEVADA CNTY SANITATION DISTRICT | LAKE OF THE PINES WWTP | 5A290104003 | 31 | 0 |
| 5S | ROSEVILLE CITY | DRY CREEK WWTP | 5A310106001 | 31 | 3 |
| 5S | CA DEPT OF CORRECTIONS- JAMESTOWN | SIERRA CONSERVATION CENTER WTP (NPDES) | 5C550801002 | 30 | 30 |
| 5S | UC DAVIS | UC DAVIS MAIN STP | 5A570800001 | 27 | 5 |
| 5S | SACRAMENTO REGIONAL CSD | SACRAMENTO REGIONAL WWTP | 5A340108002 | 18 | 0 |
| 5S | CA DEPT OF GENERAL SERVICES REAL ESTATE | CENTRAL HEATING/COOLING FAC | 5A340802001 | 15 | 15 |
| 5S | MODESTO CITY | GRAYSON PARK WELL NO.295 | 5C500117001 | 15 | 15 |
| 5S | OLIVEHURST PUD | OLIVEHURST WWTP | 5A580102001 | 15 | 0 |
| 5S | GAYLORD CONTAINER CORP | ANTIOCH PULP & PAPER MILL | 5B072039001 | 14 | 14 |
| 5S | WOODLAND CITY | WOODLAND WWTP | 5A570105001 | 14 | 0 |
| 5S | DAVIS CITY | DAVIS WWTP | 5A570100001 | 12 | 0 |
| 5S | EL DORADO IRRIGATION DISTRICT | DEER CREEK WWTP | 5B090102001 | 11 | 8 |
| 5S | KINDER MORGAN ENERGY PTNRS,LP (5S) | ELMIRA REMEDIATION PROJECT | 5A48NP00001 | 11 | 0 |
| 5S | COLLINS & AIKMAN PRODUCTS CO | FORMER WICKES FOREST INDUSTRIE | 5A482016001 | 10 | 0 |
| 5S | JACKSON CITY | CITY OF JACKSON WWTP | 5B030103001 | 10 | 0 |
| 5S | HUNT-WESSON, INC. | HUNT-WESSON, INC. | 5A572002001 | 9 | 6 |
| 5S | CA DEPT OF FISH & GAME NIMBUS | NIMBUS HATCHERY | 5A340801001 | 8 | 7 |
| 5S | PLACER COUNTY DEPT OF FACILITY SERVICES | PLACER CNTY SMD NO 3 | 5A310104018 | 8 | 0 |
| 5S | SACRAMENTO COGENERATION AUTHORITY | SACRAMENTO COGEN AUTH PROJECT | 5A342041001 | 8 | 8 |
| 5S | AUBURN CITY | AUBURN WWTP | 5A310100001 | 7 | 0 |
| 5S | CALIF AMMONIA COMPANY | CALAMCO - STOCKTON TERMINAL | 5B392095001 | 7 | 7 |
| 5S | HERSHEY FOODS CORP | HERSHEY CHOCOLATE USA, OAKDALE | 5C502003001 | 7 | 0 |
| 5S | BROWN SAND, INC. | OAKWOOD LAKE SUBDIVISION MINING RECLAMAT | 5B392082001 | 6 | 0 |

| Regional Office | AGENCY | FACILITY | WDID | MMP Violations (Includes both confirmed and alleged MMP violations) | Violations Receiving Penalty (Does not include pending Penalties) |
|-----------------|--|-----------------------------------|--------------|---|---|
| 5S | PROCTER AND GAMBLE COMPANY | PROCTER & GAMBLE CO WWTP | 5A342004001 | 6 | 6 |
| 5S | GWF POWER SYSTEMS, L.P. | GWF POWER SYSTEMS, SITE | 5B072050003 | 5 | 5 |
| 5S | MAXWELL P.U.D. | MAXWELL PUD WWTF | 5A060102001 | 5 | 0 |
| 5S | NEVADA CITY | NEVADA CITY WWTP | 5A290101001 | 5 | 0 |
| 5S | ORIGINAL SIXTEEN TO ONE MINE | SIXTEEN TO ONE MINE | 5A462023001 | 5 | 0 |
| 5S | SAN JOAQUIN CNTY | CSA 31 - FLAG CITY | 5B390115001 | 5 | 0 |
| 5S | CA DEPT OF GENERAL SERVICES REAL ESTATE | STATE PRINTING & WAREHOUSES | 5A340805001 | 4 | 0 |
| 5S | TRACY CITY | TRACY WWTP | 5B390108001 | 4 | 4 |
| 5S | LINDA CNTY WATER DISTRICT | LINDA CNTY WATER DISTRICT WWTP | 5A580100002 | 3 | 0 |
| 5S | WETSEL OVIATT LUMBER COMPANY | WETSEL OVIATT LUMBER MILL | 5B092006001 | 3 | 3 |
| 5S | MIRANT DELTA LLC | CONTRA COSTA POWER PLT ANTIOCH | 5B072014008 | 2 | 0 |
| 5S | CA DEPT OF FISH & GAME NIMBUS | MOKELUMNE RIVER FISH HATCHERY | 5B390800001 | 1 | 0 |
| 5S | EAST BAY MUD | CAMANCHE DAM POWER HOUSE | 5B390114001 | 1 | 1 |
| 5S | GRASS VALLEY CITY | GRASS VALLEY STP | 5A290100001 | 1 | 0 |
| 5S | HERMAN & HELENS MARINA | HERMAN & HELENS MARINA | 5B39NP00035 | 1 | 1 |
| 5S | KINDER MORGAN ENERGY PTNRS,LP (5S) | FOX RD PIPELINE RELEASE SITE | 5A48NP00004 | 1 | 0 |
| 5S | MODESTO ID | MODESTO ID REGIONAL WTP | 5C500114003 | 1 | 0 |
| 5S | PLACERVILLE CITY | PLACERVILLE CITY HANGTOWN CREE | 5A090100001 | 1 | 0 |
| 5S | SACRAMENTO CNTY SOLID WASTE MANAGEMENT | KIEFER LANDFILL GW TREATMENT | 5A340311002 | 1 | 1 |
| 5S | SACRAMENTO REGIONAL CSD-ELK GV | WALNUT GROVE WWTP (CSD1) | 5A340107010 | 1 | 0 |
| 5S | STOCKTON CITY | IVANO LANE | 5B39NP00034 | 1 | 1 |
| 5S | EL DORADO IRRIGATION DISTRICT | EL DORADO HILLS WWTP-1 | 5B090102005 | 0 | 0 |
| 5S | STOCKTON COGENERATION COMPANY | STOCKTON COGENERATION FACILITY | 5B392071001 | 0 | 0 |
| I | | | REGION TOTAL | 3519 | 1493 |

| Regional Office | AGENCY | FACILITY | WDID | MMP Violations (Includes both confirmed and alleged MMP violations) | Violations Receiving Penalty (Does not include pending Penalties) |
|-----------------|----------------------|----------------|---------------------|---|---|
| 6A | SUSANVILLE CONSOL SD | SUSANVILLE CSD | 6A181554001 | 5 | 0 |
| | | | REGION TOTAL | 5 | 0 |

| Regional Office | AGENCY | FACILITY | WDID | MMP Violations (Includes both confirmed and alleged MMP violations) | Violations Receiving Penalty (Does not include pending Penalties) |
|-----------------|--|-----------------------------|---------------------|---|---|
| 6B | VICTOR VALLEY WASTEWATER RECLAMATION AUT | VICTOR VALLEY MUNI WTP | 6B360109001 | 79 | 0 |
| 6B | CA DEPT OF FISH & GAME REGION 6 | HOT CREEK HATCHERY NPDES | 6B260801001 | 8 | 0 |
| 6B | ALPERS TROUT LLC | ALPERS TROUT LLC | 6B269907002 | 5 | 5 |
| | | | REGION TOTAL | 92 | 5 |

| Regional Office | AGENCY | FACILITY | WDID | MMP Violations (Includes both confirmed and alleged MMP violations) | Violations Receiving Penalty (Does not include pending Penalties) |
|-----------------|--------------------|--|-------------|---|---|
| 7 | COACHELLA SD | COACHELLA SD WWTP | 7A330104012 | 264 | 207 |
| 7 | BRAWLEY CITY | BRAWLEY CITY WWTP | 7A130100011 | 120 | 111 |
| 7 | NILAND SD | NILAND SD WWTP | 7A130109011 | 91 | 42 |
| 7 | CALIPATRIA CITY | CALIPATRIA CITY WWTP | 7A130102041 | 76 | 29 |
| 7 | SEELEY CNTY WD | SEELEY CWD WWTP | 7A130111013 | 69 | 7 |
| 7 | ORMAT NEVADA, INC. | HEBER GEOTHERMAL FACILITY | 7A132160001 | 35 | 35 |
| 7 | IMPERIAL CITY | IMPERIAL CITY WWTP | 7A130106011 | 33 | 25 |
| 7 | ORMAT NEVADA, INC. | SECOND IMPERIAL GEOTHERMAL FACILITY | 7A132210001 | 24 | 20 |
| 7 | PETER M. ORMAND | PETER M ORMAND DATE GARDENS MHP | 7A131057011 | 23 | 0 |

| Regional Office | AGENCY | FACILITY | WDID | MMP Violations (Includes both confirmed and alleged MMP violations) | Violations Receiving Penalty (Does not include pending Penalties) |
|-----------------|------------------------|---|---------------------|---|---|
| 7 | CA DEPT OF CORRECTIONS | CA DEPT OF CORRECTIONS CENTINELA WWTP | 7A131337001 | 21 | 15 |
| 7 | EL CENTRO CITY | EL CENTRO CITY WWTP | 7A130103011 | 18 | 10 |
| 7 | HEBER PUD | HEBER PUD WWTP | 7A130104011 | 18 | 3 |
| 7 | IMPERIAL ID | IMPERIAL ID GRASS CARP HATCHERY | 7A130128015 | 12 | 8 |
| 7 | WESTMORLAND CITY | WESTMORLAND CITY WWTP | 7A130112012 | 10 | 8 |
| 7 | RALPH BEATTY | COUNTRY LIFE MHPRV ASSET PARTNERS LP WWT | 7A131001011 | 9 | 0 |
| 7 | VALLEY SD | VALLEY SD WWTP | 7A330122021 | 9 | 2 |
| 7 | HOLTVILLE CITY | HOLTVILLE CITY WWTP | 7A130105011 | 8 | 0 |
| 7 | CALEXICO CITY | CALEXICO CITY WWTP | 7A130101011 | 5 | 4 |
| 7 | MCCABE USD | MCCABE USD WWTP | 7A130114011 | 5 | 5 |
| 7 | IMPERIAL CCD | IMPERIAL CCD WWTP | 7A130113011 | 4 | 3 |
| | | | REGION TOTAL | 854 | 534 |

| Regional Office | AGENCY | FACILITY | WDID | MMP Violations (Includes both confirmed and alleged MMP violations) | Violations Receiving Penalty (Does not include pending Penalties) |
|-----------------|---|----------------------------------|-------------|---|---|
| 8 | YUCAIPA VALLEY WATER DIST | HENRY N. WOCHHOLZ WWRF | 8 362222001 | 295 | 293 |
| 8 | CORONA CITY | CORONA CITY STP NO. 1 | 8 330108001 | 112 | 103 |
| 8 | WESTERN RIVERSIDE CNTY REGIONAL WASTEWAT | STP,NORCO | 8 332353001 | 105 | 103 |
| 8 | RIALTO CITY | RIALTO CITY STP | 8 360112001 | 57 | 22 |
| 8 | COLTON/SAN BERNARDINO RTT&WRA | COLTON/SAN BERNADINO STP, RIX | 8 362375001 | 52 | 52 |
| 8 | LEE LAKE WATER DISTRICT | LEE LAKE WD REGIONAL PLANT | 8 332253001 | 35 | 0 |
| 8 | JURUPA COMMUNITY SERVICES DIST | JURUPA CMSD STP INDIAN HILLS | 8 330107002 | 31 | 0 |
| 8 | INLAND EMPIRE UTILITIES AGENCY | IEUA REGIONAL PLANT NO. 1 & 4 | 8 360104004 | 23 | 21 |
| 8 | EASTERN MUNICIPAL WATER DIST | STP,LIVE STREAM-ALL PLANTS | 8 332303001 | 15 | 15 |

| Regional Office | AGENCY | FACILITY | WDID | MMP Violations (Includes both confirmed and alleged MMP violations) | Violations Receiving Penalty (Does not include pending Penalties) |
|-----------------|---|---|---------------------|---|---|
| 8 | IRVINE RANCH WATER DIST | MICHELSON WASTEWATER RECLAMATION FACILIT | 8 302006002 | 10 | 4 |
| 8 | BIG BEAR AREA REGIONAL WW AGENCY | STP,BB LAKE & BB CITY | 8 360108001 | 9 | 0 |
| 8 | CORONA CITY | CORONA CITY STP NO. 3 | 8 332476001 | 2 | 1 |
| 8 | ROBERTSONS READY MIX | ROBERTSONS READY MIX STAR BATC | 8 301011160 | 2 | 0 |
| 8 | ADAMS STEEL | ADAMS STEEL SALVAGE | 8 302741001 | 1 | 1 |
| 8 | INLAND EMPIRE UTILITIES AGENCY | IEUA CARBON CANYON WATER RECLAMATION FAC | 8 362283001 | 1 | 1 |
| 8 | SAN BERNARDINO CITY MUNICIPAL WATER DEPT | STP,SAN BERNARDINO | 8 360114003 | 1 | 0 |
| 8 | SUNKIST GROWERS, INC | ORANGE PRODUCTS DIVISION | 8 362038001 | 1 | 0 |
| 8 | TE VELDE, KEN | KEN TE VELDE DAIRY, GRAPEWIN | 8 335656001 | 1 | 0 |
| 8 | UNITED PARCEL SERVICE | STORM, ONTARIO | 8 362368001 | 1 | 0 |
| 8 | INLAND EMPIRE UTILITIES AGENCY | IEUA REGIONAL PLANT NO. 5 | 8 362744001 | 0 | 0 |
| 8 | ORANGE COUNTY SANITATION DISTRICT | OCSD WWTP | 8 300110002 | 0 | 0 |
| | | | REGION TOTAL | 754 | 616 |

| Regional Office | AGENCY | FACILITY | WDID | MMP Violations (Includes both confirmed and alleged MMP violations) | Violations Receiving Penalty (Does not include pending Penalties) |
|-----------------|-------------------------------------|--|-------------|---|---|
| 9 | ESCONDIDO CITY | HARRF DISCH TO SAN ELIJO OO | 9 00000031 | 393 | 392 |
| 9 | SOCWA-SAN JUAN CREEK OCEAN O/F | SOUTH COAST WATER DISTRICT GROUNDWATER R | 9 000000175 | 84 | 0 |
| 9 | SOCWA-SAN JUAN CREEK OCEAN O/F | SAN CLEMENTE WRP | 9 000000175 | 47 | 0 |
| 9 | SAN DIEGO COUNTY WATER AUTHORITY | SAN VICENTE PIPELINE PROJECT | 9 000001414 | 39 | 39 |
| 9 | SAN DIEGO, CITY OF | SAN DIEGO CITY CONVENTION CENTER DEWATER | 9 000000329 | 29 | 22 |

| Regional Office | AGENCY | FACILITY | WDID | MMP Violations (Includes both confirmed and alleged MMP violations) | Violations Receiving Penalty (Does not include pending Penalties) |
|-----------------|---|--|---------------------|---|---|
| 9 | FALLBROOK PUBLIC UTILITY DIST | FALLBROOK PUD,OCEANSIDE OCN OF | 9 000000115 | 28 | 28 |
| 9 | PERRY & PAPENHAUSEN CONSTRUCTION, INC. | 501 FIRST STREET, CORONADO CA, DICKERSON | 9 000001411 | 15 | 15 |
| 9 | SAN DIEGO CITY | POINT LOMA OCEAN OUTFALL | 9 000000275 | 14 | 14 |
| 9 | KINDER MORGAN ENERGY PARTNERS LLP | MISSION VALLEY TERMINAL | 9 00000506 | 13 | 0 |
| 9 | ESCONDIDO CITY | HARRF DISCH TO ESCONDIDO CREEK | 9 00000833 | 11 | 11 |
| 9 | SOCWA-SAN JUAN CREEK OCEAN O/F | SMWD-CHIQUITA WRP | 9 000000175 | 11 | 0 |
| 9 | SAN ELIJO JOINT POWERS | SAN ELIJO WPCF | 9 000000125 | 10 | 0 |
| 9 | FALLBROOK PUBLIC UTILITY DIST | FALLBROOK PLANT 1 DISCH TO OCEANSIDE OCE | 9 000000115 | 9 | 0 |
| 9 | PROMENADE MALL DEVELOPMT CORP | PROMENADE AT PACIFIC BCH DEWAT | 9 00000588 | 9 | 0 |
| 9 | SEA WORLD, INC | SEAWORLD, SAN DIEGO | 9 00000083 | 8 | 8 |
| 9 | SOCWA-SAN JUAN CREEK OCEAN O/F | SOCWA SAN JUAN CREEK OCEAN O/F | 9 000000175 | 4 | 2 |
| 9 | SOCWA-ALISO CREEK OCEAN O/F | SOCWA ALISO CREEK OCEAN OUTFALL | 9 000000117 | 3 | 3 |
| 9 | SOUTHERN CALIFORNIA EDISON - SAN CLEMENT | SONGS UNIT 1 | 9 00000086 | 3 | 3 |
| 9 | SOCWA-SAN JUAN CREEK OCEAN O/F | CITY OF SAN JUAN CAPISTRANO REVERSE OSMO | 9 000000175 | 2 | 0 |
| 9 | AMERICA PLAZA OWNERS ASSOC | ONE AMERICA PLAZA DEWATER | 9 000000469 | 1 | 1 |
| 9 | PADRE DAM MWD | PADRE DAM WRF | 9 000000053 | 1 | 0 |
| 9 | SOUTHWEST MARINE, INC | BAE SYSTEMS SAN DIEGO SHIP REPAIR (FORME | 9 000000137 | 1 | 1 |
| 9 | BEUS, LEO RAY C/O JNE ASSOC | CORONADO RESIDENCE DEWAT | 9 00000947 | 0 | 0 |
| 9 | SOUTHERN CALIFORNIA EDISON - SAN CLEMENT | SONGS UNIT 3 | 9 00000088 | 0 | 0 |
| | | | REGION TOTAL | 735 | 539 |