

**Attachment 1
Enforcement Report**

TABLE 1: ISSUED FINAL ADMINISTRATIVE CIVIL LIABILITY (ACL) ORDERS

Discharger/ Facility/ County	Number & Type of Violations / Program/ Waterbody	Penalty Amount/ Order No./ Issued Date	Summary
- California Department of Corrections and Rehabilitation - California Men's Colony Wastewater Treatment Plant - San Luis Obispo County	- (25) effluent limit violations for copper, bis (2-ethylhexyl) phthalate, total nitrogen, pH, and dibromochloromethane - NPDES Program - Chorro Creek	- \$75,000 - ACL Order No. R3-2021-0002 - Issued September 14, 2021	This ACL Order imposes the mandatory minimum penalty for 25 violations of NPDES permit effluent limits. Resolved by settlement via expedited payment program offer.
- Heritage Ranch Community Services District - Wastewater Treatment Plant - San Luis Obispo County	- (6) effluent limit violations for total nitrate and copper - Un-named tributary to Nacimiento River	- \$18,000 - ACL Order No. R3-2021-0030 - Issued November 1, 2021	This ACL Order imposes the mandatory minimum penalty for six violations of NPDES permit effluent limits. Resolved by settlement via expedited payment program offer.

Discharger/ Facility/ County	Number & Type of Violations / Program/ Waterbody	Penalty Amount/ Order No./ Issued Date	Summary
- City of Scotts Valley - Water Reclamation Facility - Santa Cruz County	- (1) effluent limit violation for 2,3,7,8-tetrachlorodibenzo-p-dioxin (TCDD) Equivalents - Pacific Ocean	- \$3,000 - ACL Order No. R3-2021-0103 - Issued November 1, 2021	This ACL Order imposes the mandatory minimum penalty for one violation of an NPDES permit effluent limit. Resolved by settlement via expedited payment program offer.
- City of Greenfield - Wastewater Treatment Plant - Monterey County	- Unauthorized discharge of treated municipal wastewater to groundwater in violation of California Water Code - Waste Discharge Requirements Program - Groundwater	- \$172,115 - ACL Order No. R3-2021-0104 - December 17, 2021	This ACL order imposes a penalty for the unauthorized discharge of treated municipal wastewater from the City of Greenfield's wastewater treatment facility to the floodplain of the Salinas River and groundwater on May 8, 2018. The City was offered the option of putting a portion of the administrative civil liability towards a Supplemental Environmental Project and/or Enhanced Compliance Action, but ultimately decided to pay the administrative civil liability in full to the Waste Discharge Permit Fund. Resolved via settlement and issued by the Executive Officer on December 17, 2021.
- Chris Mathys et al. - Former SEMCO Twist Drill and Tool Company - Santa Barbara County	- Failure to submit technical report - Site Cleanup Program - Groundwater	- \$125,893 - ACL Order No. R3-2022-0013 - January 20, 2022	This ACL order imposes a penalty for failing to submit a site investigation and assessment workplan to evaluate the impacts to indoor air, soil, and groundwater from former spills of trichloroethylene. Resolved via settlement and issued by the Executive Officer on January 20, 2022.

TABLE 2: Issued Expedited Payment Program Letters (EPLs; Settlement Proposals for Mandatory Minimum Penalties per the Water Code or for Other Non-Controversial Issues)

Discharger/ Facility County	Number & Type of Violations/ Program/ Waterbody	Proposed Penalty & Offer	Status²
- City of San Luis Obispo - Wastewater Treatment Plant - San Luis Obispo County	- (7) effluent limit violations for dibromochloromethane, dichlorobromomethane, and total coliform - San Luis Obispo Creek	- \$21,000 - EPL Offer No. R3-2021- 0061 - Issued December 9, 2021	Discharger has the option to accept, contest, or refuse the offer.

² EPL Offers have three primary stages: 1) the Discharger has the option to accept, contest, or refuse the offer, 2) if accepted the offer is posted for public comment, or 3), the offer is issued by the Central Coast Water Board Executive Officer as ACL order. EPLs executed as ACL orders are listed in Table 1 above. In accordance with the State Water Board’s 2017 SEP Policy, effective May 3, 2018, Central Coast Water Board Enforcement staff is temporarily withholding the Central Coast Ambient Monitoring Program-Groundwater Assessment and Protection (CCAMP-GAP) Project as a SEP until the State Water Board approves it by resolution. Enforcement staff anticipates the State Water Board’s consideration of a resolution in fiscal year 2021-2022.

TABLE 3: ISSUED TIME SCHEDULE ORDERS (TSOs)

Discharger	Facility & Address/ Program/ Waterbody	TSO Order No. and Date	Summary
The Neil Jones Food Company, San Benito Foods	-San Benito Foods Tomato Processing Facility -110 Howkins Street, Hollister, San Benito County -WDR Program -Hollister Groundwater Sub-Basin	- TSO Order No. R3-2021-0038 -October 22, 2021 -Compliance required by December 31, 2025	The TSO prescribes interim groundwater limitations for total dissolved solids, chloride, sodium, sulfate, boron, nitrate, total trihalomethanes, and five haloacetic acids, which must be met immediately. The TSO prescribes interim effluent limitations for total fixed dissolved solids, chloride, sodium, nitrate, total trihalomethanes, and five haloacetic acids that San Benito Foods must meet by December 31, 2022. The TSO also requires San Benito Foods to implement actions proposed in the January 2021 wastewater alternatives identification technical memorandum to achieve compliance with General Order No. R3-2004-0066 for total dissolved solids, biological oxygen demand, odor prevention, and total nitrogen by December 31, 2025.

TABLE 4: ISSUED NOTICES OF VIOLATION (NOVs)

Facility Subject to NOV	Discharger/ Responsible Parties	Program	Violation Type	County
[90 NOVs dated 10/18/21] for Industrial Stormwater Facilities	Multiple	Industrial Stormwater	- Failure to recertify No Exposure Certifications	Multiple
[21 NOVs dated 1/3/22] for Industrial Stormwater Facilities	Multiple	Industrial Stormwater	- Failure to recertify No Exposure Certifications	Multiple
[235 NOVs dated 2/23/22] for Irrigated Lands Program Operations and Landowners	Multiple	Irrigated Lands Program	- Failure to submit groundwater sampling data under Ag Order 3.0	Multiple
Los Osos Closed Landfill	- County of San Luis Obispo	Land Disposal	- Failure to submit a complete technical report pursuant to Water Code section 13267	San Luis Obispo
City of San Luis Obispo Municipal Stormwater System	- City of San Luis Obispo	Municipal Stormwater	- Failure to comply with post-construction requirements	San Luis Obispo
Ocean Canyon Camping Resort / Avila-Pismo Beach KOA	- Reynolds Resorts – Avila Beach, LLC	Waste Discharge Requirements	- Failure to properly operate and maintain all facilities and systems of treatment and control - Failure to file a report of waste discharge at least 120 days before making any material change or proposed change in the character, location, or volume of the discharge - Discharge to areas other than the disposal area shown in waste discharge requirements	San Luis Obispo

Facility Subject to NOV	Discharger/ Responsible Parties	Program	Violation Type	County
City of Morro Bay Water Reclamation Facility Construction Site (based on 10/20/21 Inspection)	- City of Morro Bay	Construction Storm Water	- Failure to implement effective erosion and sediment controls - Failure to implement linear sediment controls	San Luis Obispo
City of Morro Bay Water Reclamation Facility Construction Site (based on 12/10/21 Inspection)	- City of Morro Bay	Construction Storm Water	- Failure to implement effective erosion and sediment controls - Failure to implement linear sediment controls	San Luis Obispo
Wastewater Treatment and Disposal Operations	- California Polytechnic State University	Waste Discharge Requirements	- Discharge caused nitrate concentrations in the groundwater downgradient of the disposal area to significantly increase or to exceed 10 mg/L (as N) - Discharge causes a significant increase of total dissolved solids concentrations in ground waters - Failure to implement water quality management plan - Failure to regularly evaluate and update water quality management plan - Failure to submit annual monitoring reports - Failure to submit complete quarterly reports	San Luis Obispo
Andrews Cannabis Cultivation Facility	- Janet Andrews	Cannabis Cultivation	- Failure to obtain regulatory coverage	San Luis Obispo

Facility Subject to NOV	Discharger/ Responsible Parties	Program	Violation Type	County
[2 Notices of Violation] Unauthorized fill site near intersection of Buena Vista Drive and Whiskey Hill Drive in Watsonville	- Connie Brown	Water Quality Certification	- Unauthorized discharge of waste to waters of the United States (wetlands adjacent to Gallighan Slough) - Failure to submit complete technical report	Santa Cruz
Pajaro River Roughness Reduction Project	- Santa Cruz County Flood Control and Water Conservation District Zone 7	Water Quality Certification	- Failure to submit required report of waste discharge	Santa Cruz
Myriad Flowers International (AW1362), Myriad Flowers 2 Greenhouse Facility	- Myriad Flowers International	Irrigated Lands	- Incomplete technical report	Santa Barbara
Santa Barbara County Municipal Stormwater System	- County of Santa Barbara	Municipal Stormwater	- Failure to comply with post-construction requirements	Santa Barbara
Vandenberg Village Community Services District Sanitary Sewer System	- Vandenberg Village Community Services District	Waste Discharge Requirements	- Unauthorized discharge of waste	Santa Barbara

Facility Subject to NOV	Discharger/ Responsible Parties	Program	Violation Type	County
Imerys Filtration Minerals Facility	- Imerys Minerals California, Inc.	Industrial Storm Water	- Failure to maintain updated Storm Water Pollution Prevention Plan - Inadequate implementation and maintenance of best management practices - Insufficient numeric action level exceedance response actions	Santa Barbara
Dutch Maid Dry Cleaner/San Roque/Loreto Plaza Cleanup Site	- James Richard, Incorporated - San Roque Plaza, LLC - Nine Others	Site Cleanup	- Failure to implement required vapor mitigation systems - Failure to provide alternative plan for vapor mitigation	Santa Barbara
Santana Ranch Construction Project	- Anderson Homes - Stonecreek Properties, LLC	Construction Storm Water	- Failure to implement good site management (“housekeeping”) measures - Failure to provide effective soil cover for inactive areas and all finished slopes, open space, utility backfill, and open lots - Failure to establish and maintain effective perimeter controls and stabilize all construction entrances and exits to sufficiently control erosion and sediment discharges from the site - Failure to effectively manage all run-on, all runoff within the site, and all runoff that discharges off the site	San Benito

Facility Subject to NOV	Discharger/ Responsible Parties	Program	Violation Type	County
O'Connor Cannabis Cultivation Facility	- Brad O'Connor - Bruce O'Connor - Katy O'Connor Revocable Trust	Cannabis Cultivation	- Failure to obtain regulatory coverage	San Benito
Gabreal and Marcus Mathias Franklin Property	- Gabreal and Marcus Mathias Franklin	Cannabis Cultivation	- Failure to obtain regulatory coverage	Monterey
Adlerbert and Lawrence Cannabis Cultivation Facility	- Anna Adlerbert and Marvin Lawrence	Cannabis Cultivation	- Failure to obtain regulatory coverage	Monterey
Moon Cannabis Cultivation Facility	- John Leonard Moon III	Cannabis Cultivation	- Failure to obtain regulatory coverage	Monterey
Lange Cannabis Cultivation Facility	- Carole I Lange	Cannabis Cultivation	- Failure to obtain regulatory coverage	Monterey
Patch and Martinez Cannabis Cultivation Facility	- Aaron J Patch and April C Martinez	Cannabis Cultivation	- Failure to obtain regulatory coverage	Monterey

TABLE 5: ISSUED NOTICES ON NON-COMPLIANCE (NNCs) FOR INDUSTRIAL OR CONSTRUCTION STORMWATER GENERAL PERMIT ANNUAL REPORTING OR ENROLLMENT

Facility Subject to NNC	Discharger/ Responsible Parties	Annual Report or Enrollment, 1st or 2nd NNC	County
Corner of Technology Drive and Thornwood Drive, Goleta Construction Site	Thornwood Real Estate, LLC	Enrollment, 1 st NNC	Santa Barbara

**TABLE 6: RECENT VIOLATIONS PENDING FURTHER ENFORCEMENT STAFF REVIEW
(JULY 1, 2021 – DECEMBER 31, 2021)**

Violation Type	Number of Violations	Associated Programs	Primary Sources of Violations
Effluent Limitations	555	- NPDES - WDR	pH, flow, total dissolved solids, sodium, chloride, nitrogen (various forms), settleable solids, chronic toxicity, turbidity, biochemical oxygen demand, total organic carbon, total suspended solids, boron, sulfate, oil and grease, ultraviolet light transmittance, bis (2-ethylhexyl) phthalate, total residual chlorine, copper dichlorobromomethane, dibromochloromethane, molybdenum, total coliform, fecal coliform, enterococci, dissolved oxygen
Receiving Water Limitations	31	- NPDES - WDR	Nitrogen (various forms), sodium, chloride, total dissolved solids
Sanitary Sewer Overflows to Surface Waters	13	- WDR	Debris, fats, oils, or grease in collection system, pipe or structural problem, and root intrusion. Volume estimates ranged from approximately 40 to 10,800 gallons.
Unauthorized Discharges	4	- Cannabis Cultivation - Food Processing	Observed discharges or unpermitted activities potentially resulting in discharges
Order Conditions	111	- NPDES - WDR - Confined Animals - Industrial Stormwater	Influent or effluent flow limits exceeded, ponds exceeding freeboard, equipment failures, ponding in sprayfields, failure to use lockouts on valves, failure to post warning signs, failure to identify recycled water piping, failure to achieve required effluent nitrogen reduction, exceeding loading rate for land discharges, exceeding allowable number of animals, and failure to recertify for No Exposure Certification

Violation Type	Number of Violations	Associated Programs	Primary Sources of Violations
Deficient Best Management Practice Implementation	5	- Municipal Stormwater - Industrial Stormwater	Failure to comply with post-construction requirements, spill response and cleanup failures, sediment discharge
Deficient Monitoring	26	- NPDES - WDR	Failures to monitor due to issues like operator error, equipment failure, limited access due to hazardous conditions, exceedance of sample holding time, or lab error
Late or Deficient Reporting	5	- WDR - Landfills	Failure to submit monitoring report by due date, reports incomplete, missing data

Violation reports are available to the public as described in further detail in the [CIWQS Violation Report Fact Sheet](#).