

**ATTACHMENT 1
ENFORCEMENT REPORT**

**TABLE 1: ISSUED FINAL ADMINISTRATIVE CIVIL LIABILITY (ACL) COMPLAINTS AND ORDERS
(AUGUST 1, 2024 – NOVEMBER 30, 2024)**

Discharger/ Facility/ County	Number & Type of Violations / Program/ Waterbody	Penalty Amount/ Order Number/ Issued Date	Summary
- Avila Beach Community Services District - Wastewater Treatment Facility - San Luis Obispo County	- (2) effluent limit violations for aldrin and chlorine - NPDES Program - San Luis Obispo Creek	- \$6,000 - ACL Order R3-2024-0048 - Issued August 27, 2024	This ACL Order imposes mandatory minimum penalties for two violations of NPDES permit effluent limit requirements. Resolved by settlement via expedited payment program offer.

**TABLE 2: ISSUED EXPEDITED PAYMENT PROGRAM LETTERS (EPL; SETTLEMENT PROPOSALS FOR MANDATORY MINIMUM PENALTIES PURSUANT TO THE CALIFORNIA WATER CODE)
(AUGUST 1, 2024 – NOVEMBER 30, 2024)**

Discharger/ Facility/ County	Number & Type of Violations/ Program/ Waterbody	Proposed Penalty & Offer	Status¹
- Phillips 66 Company - Santa Maria Refinery - Santa Barbara County	- (1) effluent limit violation for TCDD equivalents - NPDES Program - Pacific Ocean	- \$3,000 - Conditional Settlement Offer R3- 2024-0069 - Issued October 10, 2024	Discharger accepted the settlement offer and the Executive Officer issued an ACL order on December 9, 2024.

¹ 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, and 3), if there are no significant public comments, the offer is issued by the Central Coast Water Board Executive Officer as an ACL order. EPLs executed as ACL orders for this report's applicable time frame are listed in Table 1 above.

**TABLE 3: ISSUED TIME SCHEDULE ORDERS (TSO)
(AUGUST 1, 2024 – NOVEMBER 30, 2024)**

Discharger	Facility/ Address and County/ Program/ Waterbody	TSO Order/ Issue Date/ Scheduled Compliance Date	Summary
City of San Luis Obispo	-San Luis Obispo Water Resource Recovery Facility -35 Prado Road, San Luis Obispo, San Luis Obispo County -NPDES Program -San Luis Obispo Creek	-TSO Order R3-2024-0021 -September 1, 2024 -Compliance required by August 31, 2029	- Establishes interim effluent limits for total dissolved solids, chloride, sodium, sulfate, and molybdenum. - Requires implementation of source control measures by implementing a pollution prevention plan, performing a source identification study, and performing a pretreatment program local limits study. - Requires compliance with final effluent limitations for total dissolved solids, chloride, sodium, sulfate, and molybdenum by August 31, 2029.

**TABLE 4: ISSUED NOTICES OF VIOLATION (NOVS)
(AUGUST 1, 2024 – NOVEMBER 30, 2024)**

Facility Subject to NOV (Issue Date)	Discharger/ Responsible Parties	Program	Violation Type	County
[62 NOVs] Irrigated Lands (8/13/24)	Multiple	Irrigated Lands Program	- Failure to comply with groundwater monitoring and reporting requirements	Multiple
[29 NOVs] Irrigated Lands (10/17/24)	Multiple	Irrigated Lands Program	- Failure to submit Report of Waste Discharge	Multiple
San Ardo Wastewater Treatment Plant (8-23-24)	San Ardo Water District	Waste Discharge Requirements	- Operating without an appropriate grade operator	Monterey
Greenfield Wastewater Treatment Plant (10-15-24)	City of Greenfield	Waste Discharge Requirements	- No permanent markers in some of the treatment ponds - Failure to maintain at least two feet of freeboard in the treatment ponds - Failure to implement a contingency plan to prevent spills due to insufficient freeboard	Monterey
Horan, Gerald E & Horan, Jennifer C Property (8-16-24)	Horan, Gerald E & Horan, Jennifer C	Cannabis	- Unauthorized land disturbances associated with cannabis cultivation.	San Benito
Alcazar, Ivan and Jesus & Knowles, Brent Property (10-2-24)	Alcazar, Ivan and Jesus & Knowles, Brent	Cannabis	- Discharge of waste generated from commercial cannabis cultivation activities into waters of the state prior to filing a Report of Waste Discharge	San Benito

Facility Subject to NOV (Issue Date)	Discharger/ Responsible Parties	Program	Violation Type	County
Camp San Luis Obispo (8-2-24)	California Army National Guard	401/Water Quality Certification	<ul style="list-style-type: none"> - Vegetation and sediment removal conducted in exceedance of the amounts submitted - Discharge of fill material to waters of the United States - Discharge of earthen materials and other wastes to waters of the state - Failure to submit a Report of Waste Discharge - Failure to comply with monitoring and reporting requirements - Exceedance of turbidity allowances 	San Luis Obispo
Mustang Village WWTP (8-7-24, two separate notices)	Mustang Village Mobile Home Park	Waste Discharge Requirements	<ul style="list-style-type: none"> - Failure to allow Water Board staff to inspect wastewater system - Failure to submit Report of Waste Discharge 	San Luis Obispo
Costanoa Lodge and Camp (11-14-24)	Reynolds Resorts – Costanoa, LLC	Waste Discharge Requirements	<ul style="list-style-type: none"> - Operation of a wastewater treatment plant without an appropriate grade operator 	San Mateo
4951 & 160 Paradise Road, Santa Barbara (8-26-24)	SB Paradise Ranch, LLC	Cannabis	<ul style="list-style-type: none"> - Potential and actual discharge of waste from commercial cannabis cultivation activities to waters of the state prior to filing a Report of Waste Discharge 	Santa Barbara
661 Mail Road (9/17/24)	Ana Pulido	401/Water Quality Certification	<ul style="list-style-type: none"> - Failure to submit a Report of Waste Discharge - Discharge of waste without having filed a Report of Waste Discharge - Placement and discharge of materials in quantities deleterious to waters of the state 	Santa Barbara

Facility Subject to NOV (Issue Date)	Discharger/ Responsible Parties	Program	Violation Type	County
Former Semco Twist Drill and Tool Company Cleanup Site (10-30-24)	SEMCO Twist Drill and Tool Company, Inc.; Oro Financial of California, Inc.; Concha Investments, Inc.; Chris Mathys, an individual; Platino, LLC; Rhine, LP; Fernando Figueroa Salas, an individual; Mark J Powers, Inc.; and Curry Parkway, LP	Site Clean-up	- Failure to provide the required technical report	Santa Barbara
Los Prietos Boys Camp (10-31-24)	County of Santa Barbara	Waste Discharge Requirements	- Failure to submit 2023 annual report - Failure to submit Report of Waste Discharge	Santa Barbara
Inn at Mattei's Tavern (10-31-24)	Railway Jonata, LLC	Waste Discharge Requirements	- Exceedance of flow and wastewater limits from January to June of 2024	Santa Barbara
Cuyama Dairy Farm (11-26-24)	Cuyama Dairy Farm	Waste Discharge Requirements	- Failure to submit 2022 and 2023 monitoring reports	Santa Barbara

Facility Subject to NOV (Issue Date)	Discharger/ Responsible Parties	Program	Violation Type	County
353 Barnheisal Road, Hollister (8-16-24)	Sandra Yuste, Gerald and Jennifer Horan, Pensco Trust Co., Excel TDI	Cannabis	- Potential and actual discharge of waste from commercial cannabis cultivation activities to waters of the state prior to filing a Report of Waste Discharge	Santa Clara and San Benito
City of Watsonville Stormwater Management Program (8-29-24)	City of Watsonville	Stormwater	- Failure to develop a wasteload allocation attainment program that complies with all Total Maximum Daily Load (TMDL) requirements - Failure to report the status of the Watsonville Slough pathogens TMDL implementation as a part of the 2022-2023 annual report submitted to SMARTS	Santa Cruz

**TABLE 5: RECENT VIOLATIONS PENDING FURTHER ENFORCEMENT STAFF REVIEW
(JUNE 1, 2024 – SEPTEMBER 30, 2024)**

Violation Type¹	Number of Violations	Associated Programs	Primary Sources of Violations
Effluent Limitations	156	- NPDES - WDR	Ammonia, pH, boron, sulfate, sodium, chloride, chlorine, dibromochloromethane, nitrogen (various forms), biochemical oxygen demand, total suspended solids, copper, turbidity, total coliform, 2,3,7,8, and chronic toxicity-green algae growth
Receiving Water Limitations	22	- NPDES - WDR	Ammonia, total dissolved solids, pH, sulfate, water temperature, true color units, and materials (floating, suspended, and settleable)
Deficient Monitoring	26	- NPDES - WDR	Failure to monitor or deficient monitoring due to issues like equipment failure, limited access due to hazardous conditions, exceedance of sample holding time, and laboratory error
Order Conditions	17	- NPDES - WDR	Lack of testing, lack of maintenance, creating a nuisance, deficient best management practice implementation, insufficient facility maintenance, operation without a certified operator, and discharge of treated wastewater at unapproved location
Late or Deficient Reporting	11	- WDR - NPDES	Failure to submit monitoring report by due date, reports incomplete, missing data, and operator error
Other Codes	7	- WDR - Cannabis - Site Cleanup	Failure to submit Report of Waste Discharge, discharge and potential discharge of waste prior to submitting a Report of Waste Discharge, failure to submit technical report
Sanitary Sewer Overflows to Surface Waters	10	- WDR	Debris, fats, oils, or grease in collection system, root intrusion, structural failure or damage, power failure, pump station control failure, operator error. Volume estimates ranged from approximately 120 to 5,438 gallons.

¹ Violation reports are available to the public as described in further detail in the CIWQS Violation Report Fact Sheet at the following website: https://www.waterboards.ca.gov/water_issues/programs/ciwqs/docs/pub_vio_rpt_fs_pub.pdf.