

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
CENTRAL VALLEY REGION**

In the Matter of:

**CITY OF ANDERSON
WATER POLLUTION CONTROL
PLANT
SHASTA COUNTY**

ORDER R5-2026-0701

**SETTLEMENT AGREEMENT AND
STIPULATION FOR ENTRY OF
ADMINISTRATIVE CIVIL LIABILITY
ORDER**

I. Introduction

1. This Settlement Agreement and Stipulation for Entry of Administrative Civil Liability Order (Stipulated Order) is presented to the Central Valley Regional Water Quality Control Board (Central Valley Water Board), or its delegee, and is entered into by the Assistant Executive Officer of the Central Valley Water Board, on behalf of the Central Valley Water Board Prosecution Team (Prosecution Team), and City of Anderson (Discharger) (collectively known as the Parties) for adoption as an order by settlement, pursuant to California Water Code section 13323 and Government Code section 11415.60. This Stipulated Order resolves the violations alleged herein by the imposition of administrative civil liability (ACL) against the Discharger in the amount of **twelve thousand dollars (\$12,000)** which will be suspended upon completion of the compliance project described in Attachment B of this Stipulated Order (Compliance Project).

II. Recitals

2. The Discharger owns and operates the City of Anderson Water Pollution Control Plant (Facility), which provides sewerage service to approximately 7,774 residents. The Facility discharges treated municipal wastewater to the Sacramento River, a water of the United States.
3. On 11 October 2019, the Central Valley Water Board adopted Waste Discharge Requirements (WDRs) Order R5-2019-0068 (NPDES No. CA0077704), to regulate the Facility's discharge to surface water, which requires, among other things, compliance with effluent limitations at Discharge Point D-001.
4. On 18 July 2024, Central Valley Water Board staff issued a Notice of Violation (NOV) identifying thirteen (13) effluent limitation violations subject to enforcement as mandatory minimum penalties (MMPs) per Water Code section 13385. On 17 October 2025, the Discharger responded to the NOV and requested that the MMPs be applied toward a compliance project to offset the MMPs, as allowed by Water Code section 13385, subdivision (k).

5. WDRs Order R5-2019-0068, section IV.A.1, includes, in part, the following effluent limitations:

e. **Total Coliform Organisms.** Effluent total coliform organisms shall not exceed the following with compliance measured at Monitoring Location EFF-001 as described in the MRP, Attachment E:

- i. 23 most probable number (MPN) per 100 mL, as a 7-day median; and
- ii. 240 MPN/100 mL, more than once in any 30-day period.

6. Water Code section 13385, subdivisions (h) and (i), require assessment of mandatory penalties and state, in part, the following:

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

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

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

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

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

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

A) Violates a waste discharge requirement effluent limitation.

- B) Fails to file a report pursuant to Section 13260.
 - C) Files an incomplete report pursuant to Section 13260.
 - D) Violates a toxicity effluent limitation contained in the applicable waste discharge requirements where the waste discharge requirements do not contain pollutant-specific effluent limitations for toxic pollutants
7. According to the Discharger's self-monitoring reports (SMRs), and as identified in Table A of Attachment A, the Discharger committed thirteen (13) non-serious violations of effluent limitations contained in WDRs Order R5-2019-0068. Four (4) of the thirteen (13) violations constitute non-serious violations subject to MMPs pursuant to Water Code section 13385, subdivision (i). The total MMP for these violations is twelve thousand dollars (\$12,000). As stated herein, a detailed list of the alleged effluent violations is included in Attachment A.
8. Water Code section 13385, subdivision (k), states:
- (1) In lieu of assessing all or a portion of the mandatory minimum penalties pursuant to subdivisions (h) and (i) against a publicly owned treatment works serving a small community, the state board or the regional board may elect to require the publicly owned treatment works to spend an equivalent amount towards the completion of a compliance project proposed by the publicly owned treatment works, if the state board or the regional board finds all of the following:
 - (A) The compliance project is designed to correct the violations within five years.
 - (B) The compliance project is in accordance with the 2017 State Water Resources Control Board's Water Quality Enforcement Policy (Enforcement Policy), excluding any provision in the policy that is inconsistent with this section.
 - (C) The publicly owned treatment works has prepared a financing plan to complete the compliance project.
 - (2) For the purposes of this subdivision, "a publicly owned treatment works serving a small community" means a publicly owned treatment works serving a population of 20,000 persons or fewer or a rural county, with a financial hardship as determined by the state board after considering such factors as median income of the residents, rate of unemployment, or low

population density in the service area of the publicly owned treatment works.

9. Pursuant to the Enforcement Policy, a publicly owned treatment works has a financial hardship when its service area satisfies one of the following criteria:
 - A) Median household income for the community is less than 80 percent of the California median household income.
 - B) The community has an unemployment rate of 10 percent or greater, or
 - C) Twenty percent of the population is below the poverty level.
10. The Central Valley Water Board finds the Discharger is eligible for a compliance project because the Facility is a publicly owned treatment works serving a small community with a financial hardship. The Discharger serves a population of approximately 7,774 with a median household income (MHI) of \$47,375, which is 47% of the statewide MHI (\$100,149), according to the 2024 American Community Survey 5-Year Estimates.
11. The Discharger submitted a proposal for the Compliance Project, which is designed to eliminate future effluent limitation violations. The Discharger modified its chlorine contact basin to increase retention time to more effectively remove pathogens. Additional information and requirements regarding the Compliance Project is contained in Attachment B, attached hereto and incorporated by reference.
12. Central Valley Water Board staff find that the proposed project qualifies as a compliance project within the meaning of Water Code section 13385, subdivision (k), because it will remedy future violations for total coliform. The amount that the Discharger will expend on the Compliance Project is in excess of the MMP that the Board is required to assess under Water Code sections 13385, subdivision (h) and (i), for the violations listed in Attachment A.
13. The Parties have engaged in confidential settlement negotiations and agree to settle the matter without administrative or civil litigation by presenting this Stipulated Order to the Central Valley Water Board, or its delegee, for adoption as an order by settlement, pursuant to Water Code section 13323 and Government Code section 11415.60. To resolve the violations by consent and without further administrative proceedings, the Parties have agreed to the imposition of an ACL in the amount of twelve thousand dollars (\$12,000) in MMPs against the Discharger. The entire twelve thousand dollar (\$12,000)

penalty will be satisfied through the completion of the Compliance Project described in Attachment B.

14. The Prosecution Team believes that the resolution of the alleged violations is fair and reasonable and fulfills its enforcement objectives, that no further action is warranted concerning the violations alleged herein, and that this Stipulated Order is in the best interest of the public.

III. Stipulations

The Parties incorporate the foregoing Recitals and stipulate to the following:

15. Jurisdiction: The Parties agree that the Central Valley Water Board has subject matter jurisdiction over the matters alleged in this action and personal jurisdiction of the Parties to this Stipulation.

16. Administrative Civil Liability:

A) The Discharger hereby agrees to the imposition of an ACL in the amount of **twelve thousand dollars (\$12,000)** to the Central Valley Water Board to resolve the violations specifically alleged in Attachment A to this Order.

B) The entire **twelve thousand dollar (\$12,000)** penalty will be suspended through the completion of the Compliance Project described in Finding 13, in accordance with Water Code section 13385, subdivision (k). This amount is also referred to as the Suspended Liability Amount.

17. Representations and Agreements: The Discharger understands that the completed Compliance Project is a material condition of this settlement of liability between the Discharger and the Prosecution Team. As a material consideration for the Central Valley Water Board's acceptance of this Stipulated Order, the Discharger represents and agrees that, in accordance with Water Code section 13385, subdivision (k)(1):

A) The Compliance Project is designed to correct the violations within five years.

B) The Compliance Project is in accordance with the Enforcement Policy:

- i. The Central Valley Water Board will not authorize additional compliance projects for this matter, except under unusual circumstances;

- ii. The Discharger agrees that the Central Valley Water Board has the right to require a third-party audit of the funds expended by it to implement the Compliance Project; and
- iii. The Discharger shall permit inspection of the Compliance Project by Central Valley Water Board staff during normal business hours, at any location where the Compliance Project is being implemented, as well as review of any documents associated with implementation of the Compliance Project, at any time without notice.

18. Third Party Financial Audit of Compliance Project: At the written request of the Central Valley Water Board, the Discharger, at its sole cost, shall submit a report prepared by an independent third party acceptable to the Central Valley Water Board providing such party's professional opinion whether the Discharger has expended money on the Compliance Project in the amounts claimed by the Discharger. The written request shall specify the reasons why the audit is being requested. The audit report shall be provided to the Central Valley Water Board within six (6) months of the request from the Central Valley Water Board to the Discharger for the independent third-party audit. The audit need not address any costs incurred by the Central Valley Water Board for oversight.

19. Compliance with Applicable Laws and Regulatory Changes: The Discharger understands that payment of an ACL in accordance with the terms of this Stipulated Order and/or compliance with the terms of this Stipulated Order is not a substitute for compliance with applicable laws, and that additional violations of the type alleged may subject it to further enforcement, including additional ACLs. Nothing in this Stipulated Order shall excuse the Discharger from meeting any more stringent requirements which may be imposed hereafter by changes in applicable and legally binding legislation or regulations.

20. Party Contacts for Communications Related to Stipulated Order:

FOR THE CENTRAL VALLEY WATER BOARD:

Michael Collins
Senior Water Resource Control Engineer
NPDES Unit
364 Knollcrest Drive, Suite 205
Redding, CA 96002
(530) 224-4785
Michael.Collins@waterboards.ca.gov

FOR THE DISCHARGER:

Joey Forseth-Deshais
City Manager for the City of Anderson
1887 Howard Street
Anderson, CA 95971
(530) 378-6646
jforseth@ci.anderson.ca.us

21. Attorney's Fees and Costs: Except as otherwise provided herein, each Party shall bear all attorneys' fees and costs incurred by such Party in connection with the matters set forth herein.
22. Public Notice: The Discharger understands that this Stipulated Order will be noticed for a 30-day public review and comment period prior to consideration by the Central Valley Water Board, or its delegee. If significant new information is received that reasonably affects the propriety of presenting this Stipulated Order to the Central Valley Water Board, or its delegee, for adoption, the Assistant Executive Officer may unilaterally declare this Stipulated Order void and not present it to the Central Valley Water Board, or its delegee. The Discharger agrees that it may not rescind or otherwise withdraw its approval of this proposed Stipulated Order.
23. Procedure: The Parties agree that the procedure that has been adopted for the approval of the settlement by the Parties and review by the public, as reflected in this Stipulated Order, will be adequate. In the event procedural objections are raised prior to this Stipulated Order becoming effective, the Parties agree to meet and confer concerning any such objections and may agree to revise or adjust the procedure as necessary or advisable under the circumstances.
24. No Waiver of Right to Enforce: The failure of the Prosecution Team or Central Valley Water Board to enforce any provision of this Stipulated Order shall in no way be deemed a waiver of such provision, or in any way affect the validity of this Stipulated Order. The failure of the Prosecution Team or Central Valley Water Board to enforce any such provision shall not preclude it from later enforcing the same or any other provision of this Stipulated Order. No oral advice, guidance, suggestions, or comments by employees or officials of any Party regarding matters covered under this Stipulated Order shall be construed to relieve any Party regarding matters covered in this Stipulated Order. The Central Valley Water Board reserves all rights to take additional enforcement actions, including without limitation, the issuance of ACL complaints or orders for violations other than those addressed by this Stipulated Order.

25. Effect of Stipulated Order: Except as expressly provided in this Stipulated Order, nothing in this Stipulated Order is intended nor shall it be construed to preclude the Central Valley Water Board or any state agency, department, board or entity or any local agency from exercising its authority under any law, statute, or regulation.
26. Interpretation: This Stipulated Order shall not be construed against any party preparing it but shall be construed as if the Parties jointly prepared it and any uncertainty and ambiguity shall not be interpreted against any one party.
27. Modification: This Stipulated Order shall not be modified by any of the Parties by oral representation whether made before or after the execution of this Order. All modifications must be made in writing expressly referencing this Stipulated Order and approved by the Central Valley Water Board or its delegee.
28. Integration: This Stipulated Order constitutes the entire agreement between the Parties and may not be amended or supplemented except as provided for in this Stipulated Order.
29. If Order Does Not Take Effect: In the event that this Stipulated Order does not take effect because it is not approved by the Central Valley Water Board, or its delegee, or is vacated in whole or in part by the State Water Board or a court, the Parties acknowledge that the Prosecution Team may proceed to a contested evidentiary hearing before the Central Valley Water Board to determine whether to assess an ACL for the underlying alleged violations, or may continue to pursue settlement. The Parties agree that all oral and written statements and agreements made during the course of settlement discussions will not be admissible as evidence in any subsequent administrative or judicial proceeding or hearing and will be fully protected by California Evidence Code sections 1152 and 1154; California Government Code section 11415.60; Rule 408, Federal Rules of Evidence; and any other applicable privilege under federal and/or state law. The Parties also agree to waive any and all objections related to their efforts to settle this matter, including, but not limited to:
- A) Objections related to prejudice or bias of any of the Central Valley Water Board members or their advisors and any other objections to the extent that they are premised in whole or in part on the fact that the Central Valley Water Board members or their advisors were exposed to some of the material facts and the Parties' settlement positions, and therefore may have formed impressions or conclusions, prior to conducting any contested evidentiary hearing in this matter; or

- B) Laches or delay or other equitable defenses based on the time period that the Order or decision by settlement may be subject to administrative or judicial review.
30. Waiver of Hearing: The Discharger has been informed of the rights provided by Water Code section 13323, subdivision (b), and hereby waives its right to a hearing before the Central Valley Water Board.
31. Waiver of Right to Petition: The Discharger hereby waives the right to petition the Central Valley Water Board's adoption of the Stipulated Order as written for review by the State Water Board, and further waives the right, if any, to appeal the same to any court, including a California Superior Court and/or any California appellate level court.
32. Covenant Not to Sue: Upon the effective date of this Stipulated Order, the Discharger shall and does release, discharge, and covenant not to sue or pursue any civil or administrative claims against any State Agency or the State of California, its officers, agents, directors, employees, attorneys, representatives, for any and all claims or cause of action, which arise out of or are related to this action.
33. Water Boards Not Liable: Neither the Central Valley Water Board members, nor the Central Valley Water Board's staff, attorneys, or representatives shall be liable for any injury or damage to persons or property resulting from the negligent or intentional acts or omissions by the Discharger or its respective directors, officers, employees, agents, representatives, or contractors in carrying out activities pursuant to this Order, nor shall the Central Valley Water Board, its members, staff, attorneys, or representatives be held as parties to or guarantors of any contract entered into by the Discharger, or its directors, officers, employees, agents, representatives, or contractors in carrying out activities pursuant to this Order.
34. Authority to Bind: Each person executing this Stipulated Order in a representative capacity represents and warrants that they are authorized to execute this Order on behalf of and to bind the entity on whose behalf the Order is executed.
35. Necessity for Written Approvals: All approvals and decisions of the Central Valley Water Board under the terms of this Stipulated Order shall be communicated to the Discharger in writing. No oral advice, guidance, suggestions, or comments by employees or officials of the Central Valley Water Board regarding submissions or notices shall be construed to relieve the

Discharger of its obligation to obtain any final written approval required by this Stipulated Order.

36. No Third Party Beneficiaries: This Stipulated Order is not intended to confer any rights or obligation on any third party or parties, and no third party or parties shall have any right of action under this Stipulated Order for any cause whatsoever.
37. Severability: This Stipulated Order is severable; should any provision be found invalid the remainder shall remain in full force and effect.
38. Effective Date: This Stipulated Order shall be effective and binding on the Parties upon the date the Central Valley Water Board, or its delegee, enters the Stipulated Order.
39. Counterpart Signatures: This Stipulated Order may be executed and delivered in any number of counterparts, each of which when executed and delivered shall be deemed to be an original, but such counterparts shall together constitute one document. Further, this Stipulated Order may be executed by facsimile or electronic signature, and any such facsimile or electronic signature by any Party hereto shall be deemed to be an original signature and shall be binding on such Party to the same extent as if such facsimile or electronic signature were an original signature.

Settlement Agreement & Stipulation
Administrative Civil Liability Order
R5-2026-0701
City of Anderson
Water Pollution Control Plant
Shasta County

- 11 -

30 September 2026

IT IS SO STIPULATED.

**California Regional Water Quality Control Board Prosecution Team
Central Valley Region**

By: **Clint E. Snyder, AEO**
Clint E. Snyder, P.G.
Assistant Executive Officer

Digitally signed by Clint E.
Snyder, AEO
Date: 2026.09.29 11:14:03
-07'00'

9/29/2026

Date

City of Anderson

By: 
Joey Forseth-Deshais, City Manager
City of Anderson

10/1/2026
Date

HAVING CONSIDERED THE PARTIES' STIPULATIONS, THE CENTRAL VALLEY REGIONAL WATER QUALITY CONTROL BOARD, BY AND THROUGH ITS EXECUTIVE OFFICER, FINDS THAT:

1. The foregoing Stipulation is fully incorporated herein and made part of this Order.
2. This is an action to enforce the laws and regulations administered by the Central Valley Water Board. The Central Valley Water Board finds that issuance of this Order is exempt from the provisions of the California Environmental Quality Act (Public Resources Code, sections 21000 et seq.), in accordance with section 15321, subdivision (a)(2), Title 14, of the California Code of Regulations.
3. The Executive Officer of the Central Valley Water Board is authorized to refer this matter directly to the Attorney General for enforcement if the Discharger fails to perform any of its obligations under this Order.

Pursuant to Water Code section 13323 and Government Code section 11415.60,
IT IS HEREBY ORDERED on behalf of the California Regional Water Quality Control Board, Central Valley Region.

Patrick Pulupa, Executive Officer

Date

Enclosures: Attachment A: Record of Violations
Attachment B: Compliance Project Description

**City of Anderson
Water Pollution Control Plant**

RECORD OF VIOLATIONS (9 April 2021 – 1 April 2024) MANDATORY PENALTIES
(Data reported under Monitoring and Reporting Program R5-2019-0068)

The following table lists the alleged violations subject to mandatory minimum penalties (MMPs), pursuant to Water Code section 13385, subdivisions (h) and (i).

Table A - Violations subject to mandatory minimum penalties

#	Violation Date	Parameter	Units	Applicable Effluent Limit	Reported Value	Period	Violation Type	MMP Type	CIWQS ID	MMP Account
1	4/9/2021	Total Coliform	MPN/100 mL	23	71	7-Day Median	OEVI	NCHRON	1089855	\$0
2	10/14/2021	Total Coliform	MPN/100 mL	23	42	7-Day Median	OEVI	NCHRON	1096368	\$0
3	11/27/2021	Total Coliform	MPN/100 mL	23	111	7-Day Median	OEVI	NCHRON	1129112	\$0
4	12/22/2022	Total Coliform	MPN/100 mL	23	25	7-Day Median	OEVI	NCHRON	1112339	\$0
5	1/3/2023	Total Coliform	MPN/100 mL	23	130	7-Day Median	OEVI	NCHRON	1113319	\$0
6	1/5/2023	Total Coliform	MPN/100 mL	23	130	7-Day Median	OEVI	NCHRON	1113320	\$0

R5-2026-0701 - ATTACHMENT A
RECORD OF VIOLATIONS FOR ASSESSING MANDATORY MINIMUM PENALTIES

#	Violation Date	Parameter	Units	Applicable Effluent Limit	Reported Value	Period	Violation Type	MMP Type	CIWQS ID	MMP Account
7	2/6/2023	Total Coliform	MPN/100 mL	23	25	7-Day Median	OEV	CHRON	1114672	\$3,000
8	4/17/2023	Total Coliform	MPN/100 mL	23	27	7-Day Median	OEV	CHRON	1116451	\$3,000
9	4/20/2023	Total Coliform	MPN/100 mL	23	36	7-Day Median	OEV	CHRON	1116450	\$3,000
10	10/23/2023	Total Coliform	MPN/100 mL	23	25	7-Day Median	OEV	NCHRON	1121637	\$0
11	3/11/2024	Total Coliform	MPN/100 mL	23	28	7-Day Median	OEV	NCHRON	1125519	\$0
12	3/14/2024	Total Coliform	MPN/100 mL	23	33	7-Day Median	OEV	NCHRON	1125520	\$0
13	4/1/2024	Total Coliform	MPN/100 mL	23	28	7-Day Median	OEV	CHRON	1127122	\$3,000

R5-2026-0701 - ATTACHMENT A
RECORD OF VIOLATIONS FOR ASSESSING MANDATORY MINIMUM PENALTIES

VIOLATIONS SUMMARY:

<u>VIOLATIONS AS OF:</u>	<u>4/1/2024</u>
Serious Violations:	0
Exempt Violations Not Subject to MMPs:	0
Non-Serious Violations Subject to MMPs:	4
Non-Serious Violations Not Subject to MMPs:	9
Total Violations Subject to MMPs:	4

Mandatory Minimum Penalty Amount for Effluent Limit Violation(s)

4 Non-Serious Violations subject to MMPs x \$3,000/Violation = \$12,000

Total Mandatory Minimum Penalty = \$12,000

R5-2026-0701 - ATTACHMENT A
RECORD OF VIOLATIONS FOR ASSESSING MANDATORY MINIMUM PENALTIES

Table A - Definitions

Abbreviation	Description
CAT 1	Violation of effluent limitation for Group I pollutant.
CAT 2	Violation of effluent limitation for Group II pollutant.
CHRON	Chronic violation as defined by Water Code section 13385, subdivision (i). Any non-serious violation that falls within a 180-day period with three preceding violations. Thus, the fourth non-serious violation that occurs within a 180-day period is subject to MMPs.
CIWQS	California Integrated Water Quality System (https://www.waterboards.ca.gov/water_issues/programs/ciwqs/)
CTOX	Violation of chronic toxicity effluent limitation.
DREP	Deficient reporting violation. This will only result in MMPs if the report is so deficient as to make determination of compliance impossible for the reporting period.
LREP	Late Reporting violation. Every 30-Days a report is late counts as one serious late reporting violation subject to MMPs.
Measured	Reported value for the monitoring period by the Discharger.
MMP Type	Classification of the type of MMP violation.
NCHRON	Non-serious violation falls within the first three violations in a 180-day period, thus, not subject to MMP.
Occurrence Date	Date that a violation occurred. For averaging period limitation violations, such as weekly and monthly averages, the last day of the reporting period is used such as last day of the week (Saturday) and last day of the month, respectively.
OEV	Violation of any constituent-specific effluent limitation not included in Group I or Group II.
SIG	Serious Violation: For Group I pollutants that exceed the effluent limitation by 40 percent or more. For Group II pollutants that exceed the effluent limitation by 20 percent or more.

Compliance Project Description

Project Title: City of Anderson WPCP Disinfection Improvement Project (Compliance Project)

Geographic Area of Interest: City of Anderson WPCP, Shasta County

Name of Responsible Entity: City of Anderson

Contact Information:

Nick Jones
Chief Plant Operator (City of Anderson or District)
1887 Howard Street
Anderson, CA 95971
(530) 378-6646
njones@ci.anderson.ca.us

Compliance Project Description and Goals:

To prevent coliform violations from recurring, the Discharger performed a project to improve flow through the contact chamber. According to the Discharger, during the Facility's expansion in the 1980s, openings ("windows") were cut through the concrete end walls of the contact chamber to provide the additional contact time required for the expanded Facility. However, the concrete headers (windows) left in each bay restricted flow, causing solids to accumulate and periodically release debris, resulting in spikes in coliform levels. The project, completed in April 2025, removed the remaining headers from all four bays, restoring unobstructed flow through the chamber.

The Discharger requests that the documented cost of the completed Compliance Project be accepted in lieu of the \$12,000 in MMPs associated with this Stipulated Order. The Discharger provided a breakdown of labor and equipment costs associated with this project. The Discharger performed the work in-house, and the total project cost was \$12,479.21, which exceeds the suspended liability amount.

Estimated Cost of Compliance Project Completion:

The project cost was \$12,479.21, which is more than the entire \$12,000 of MMPs associated with this Stipulated Order.

R5-2026-0701 - ATTACHMENT B

Compliance Project Milestones and Completion Dates:

While in communication with and with concurrence from the Central Valley Regional Board, Discharger moved forward with the upgrades in order to quickly address the violations while settlement negotiations progressed.

Evidence of Completion:

The entire \$12,000 is treated as a Suspended Administrative Liability as the Discharger has submitted proof to the Central Valley Water Board that the money spent toward the Compliance Project was equal or greater than the Suspended Administrative Liability.