

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
COLORADO RIVER BASIN REGION**

ADMINISTRATIVE CIVIL LIABILITY ORDER NO. R7-2007-0055
MANDATORY MINIMUM PENALTY AND
PENALTY FOR VIOLATION OF OTHER WASTE DISCHARGE REQUIREMENTS
IN THE MATTER OF
COACHELLA SANITARY DISTRICT, OWNER/OPERATOR
MUNICIPAL WASTEWATER TREATMENT PLANT
RIVERSIDE COUNTY

This Order to assess Administrative Civil Liability (ACL) pursuant to California Water Code (CWC) Section 13385 is issued to Coachella Sanitary District (Discharger), based on a finding of on-going violations of National Pollutant Discharge Elimination System (NPDES) Waste Discharge Requirements (WDR) Board Order No. R7-2005-0083, (NPDES Permit No. CA0104493).

The Colorado River Basin Regional Water Quality Control Board (Regional Board) finds the following:

1. The Discharger owns and operates a sewage collection system and wastewater treatment plant (WWTP) that provides service to the community of the City of Coachella in Riverside County. The WWTP is a publicly owned treatment works that discharges its effluent into the Coachella Valley Storm Water Channel (Channel), which is a tributary to the Salton Sea. The Channel and the Salton Sea are waters of the United States.
2. The WWTP has a rated capacity of 2.4 million gallons per day (mgd) and consists of a wet well, bar screen and comminutor, two activated sludge treatment systems, two oxidation ponds, and chlorination and dechlorination facilities. The Discharger is upgrading its WWTP capacity to 4.5 mgd by building an oxidation ditch system. After completion of this system, the Discharger proposes to abandon the oxidation ponds.
3. The discharge from the WWTP is governed by WDR Order No. R7-2005-0083 (NPDES Permit No. CA0104493).
4. WDR Order No. R7-2005-0083 prescribes the following interim effluent limitations for the discharge from the oxidation pond system:
 - a. Provision IV.A.1.a:
Average monthly flow: 0.9 mgd
 - b. Provision IV.A.1.a.i:

Percent Removal: "The average monthly percent removal of BOD 5-day 20 °C and total suspended solids shall not be less than 65 percent."
5. WDR Order No. R7-2005-0083 prescribes the following interim effluent limitations for the discharge from the activated sludge system:
 - a. Provision IV.A.1.b:
Average monthly flow: 1.5 mgd
 - b. Provision IV.A.1.b.i:
Percent Removal: "The average monthly percent removal of BOD 5-day 20 °C and Total Suspended Solids shall not be less than 85 percent."

6. WDR Order No. R7-2005-0083 prescribes the following interim Copper, Zinc, Bis(2-Ethylhexyl)Phthalate, BOD 5-day 20 °C and Total Suspended Solids effluent limitations for the discharge of treated wastewater from the WWTP (with compliance measured at Monitoring Location M-001):

- a. Provision IV.A.2.a:

Parameter	Units	Effluent Limitations	
		Average Monthly	Maximum Daily
Copper	µg/L	12	12
	lbs/day	0.24	0.24
Zinc	µg/L	150	150
	lbs/day	3	3
Bis(2-Ethylhexyl)Phthalate	µg/L	8.5	11.8
	lbs/day	0.17	0.24

- b. Provision IV.A.1.c:

Parameter	Units	Effluent Limitations	
		Average Monthly	Average weekly
BOD 5-day 20 °C	mg/L	36	52
	lbs/day	720	1041
Total Suspended Solids	mg/L	36	52
	lbs/day	720	1041

7. Provision VI.B of WDR Order No. R7-2005-0083 states, in part, that:

“The Discharger shall comply with the Monitoring and Reporting Program... in Attachment E of this Order.”

8. The Monitoring and Reporting Program prescribes in Section IV.C.1 of Attachment E that the Discharger monitor the combined effluent discharge from the oxidation ponds and activated sludge systems at location M-001C as follows:

Parameter	Units	Sample Type	Minimum Sampling Frequency
20 °C CBOD ₅	mg/L	24-Hr. Composite	1x/Week
Suspended Solids	mg/L	24-Hr. Composite	2x/Week
Nitrates as N	mg/L	24-Hr. Composite	1x/Month
Nitrites as N	mg/L	24-Hr. Composite	1x/Month
Total Nitrogen as N	mg/L	24-Hr. Composite	1x/Month
Ammonia Nitrogen as N	mg/L	24-Hr. Composite	2x/Month
Total phosphorus (P)	mg/L	24-Hr. Composite	1x/Month
Ortho-Phosphate as P	mg/L	24-Hr. Composite	1x/Month
Bis(2-Ethylhexyl)Phthalate	µg/L	Grab	1x/Month
Priority Pollutants*	µg/L	Grab	1x/Year

* As defined by the California Toxics Rule.

9. Monitoring reports submitted by the Discharger show that the wastewater discharged from the Discharger's WWTP has been in violation of the effluent limitations cited in Finding Nos. 4, 5, and 6, above. The monitoring reports also show that the Discharger has been in violation of the monitoring and reporting requirements cited in Finding Nos. 7 and 8, above.
10. A summary of each violation of Board Order No. R7-2005-0083 is contained in Attachments "A" and "B," which are incorporated herein and made a part of this ACL Order No. R7-2007-0055 by reference.
11. CWC Section 13385(a) states, in part, that:

"Any person who violates any of the following shall be liable civilly in accordance with this section: ... (2) Any waste discharge requirements . . . issued pursuant to this chapter (3) Any [monitoring and reporting requirements] established"
12. CWC Section 13385(c) states:

"Civil liability may be imposed administratively by the state board or a regional board pursuant to Article 2.5 (commencing with Section 13323) of Chapter 5 in an amount not to exceed the sum of both of the following:

"(1) Ten thousand dollars (\$10,000) for each day in which the violation occurs.

"(2) Where there is a discharge, any portion of which is not susceptible to cleanup or is not cleaned up, and the volume discharged but not cleaned up exceeds 1,000 gallons, an additional liability not to exceed ten dollars (\$10) multiplied by the number of gallons by which the volume discharged but not cleaned up exceeds 1,000 gallons."
13. CWC Section 13385(h)(1) requires the Regional Board to assess a mandatory minimum penalty of three thousand dollars (\$3,000) for each serious violation.
14. CWC Section 13385(h)(2) states, in part, the following:

"For the purpose of this section, a 'serious violation' means any waste discharge that violates the effluent limitations . . . 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."
15. CWC Section 13385(i)(1) also requires the Regional Board to assess a mandatory minimum penalty of three thousand dollars (\$3,000) for each violation, not counting the first three violations, if the discharger does any of the following four or more times in a six-month period:
 - 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.

16. CWC Section 13385(i)(2) states:

“For the purpose of this section [13385], a ‘period of six consecutive months’ means the period commencing on the date that one of the violations described in this subdivision occurs and ending 180 days after that date.”

POTENTIAL CIVIL LIABILITY

17. As shown in Attachments A and B, the Discharger has violated waste discharge and monitoring and reporting requirements. The Regional Board can assess liability pursuant to CWC Section 13385(c) for the violations. It must, however, assess the minimum civil liability prescribed under California Code Sections 13385(h)(1) and (i)(1) for the serious and chronic effluent violations.
18. The minimum civil liability the Regional Board must assess for the serious and chronic effluent violations shown in Attachment A is one hundred thirty-two thousand dollars (\$132,000).
19. The total maximum civil liability authorized by CWC Section 13385(c) for the violations shown in Attachment A and B is over nine billion six hundred thirty-nine million dollars (> \$9,639,000,000). Attachment C, which is incorporated herein and made a part of this Complaint by reference, shows sample calculations used in determining the maximum civil liability available to the Regional Board for the violations.
20. If the Regional Board elects to assess civil liability under CWC Section 13385(c), CWC Section 13385(e) requires the Regional Board, in determining the amount of any liability, to consider the nature, circumstances, extent, and gravity of the violations, whether the discharge is susceptible to cleanup or abatement, the degree of toxicity of the discharge; and with respect to the violator, the ability to pay, the effect on its ability to continue its business, any voluntary cleanup efforts undertaken, any prior history of violations, the degree of culpability, economic benefit or savings, if any, resulting from the violation, and other matters that justice may require. At a minimum, liability must be assessed at a level that recovers the economic benefits, if any, derived from the acts that constitute the violation.
21. CWC Section 13385(l) states:

“(1) In lieu of assessing penalties pursuant to subdivision (h) or (i), the state board or regional board, with the concurrence of the discharger, may direct a portion of the penalty amount to be expended on a supplemental environmental project in accordance with the enforcement policy of the state board. If the penalty amount exceeds fifteen thousand dollars (\$15,000), the portion of the penalty amount that may be directed to be expended on a supplemental environmental project may not exceed fifteen thousand dollars (\$15,000) plus 50 percent of the penalty amount that exceeds fifteen thousand dollars (\$15,000).

“(2) For the purposes of this section, a ‘supplemental environmental project’ means an environmentally beneficial project that a person agrees to undertake, with the approval of the regional board, that would not be undertaken in the absence of an enforcement action under this section.”

22. On February 19, 2002, the State Water Resources Control Board adopted Resolution No. 2002-0040 amending the Water Quality Enforcement Policy (Enforcement Policy). The Enforcement Policy, which was approved by the Office of Administrative Law and became effective on July 30, 2002, establishes criteria for Supplemental Environmental Projects (SEPs).
23. On February 13, 2007, the Regional Board Assistant Executive Officer issued ACL Complaint No. R7-2007-0021 proposing that the Discharger pay one hundred forty-two thousand dollars (\$142,000) in ACL (MMP) violations.
24. The Regional Board has notified the Discharger and the general public of its intent to hold a hearing on this matter within 90 days from the date the Complaint was issued unless the Discharger waives its right to a hearing under CWC Section 13323(b). The Discharger waived its right to a hearing on this matter as set forth in Attachment “D”.
25. On April 12, 2007, the Discharger proposed the implementation of a SEP described in Attachment “D”, which is made a part of this ACL Order by reference. The Regional Board approved the SEP as proposed. The ACL Complaint was rescinded on April 25, 2007.
26. The Regional Board heard and considered all comments pertaining to this matter in a public meeting.
27. Issuance of this Order is exempt from the provision of the California Environmental Quality Act (Public Resources Code Section 21000 et seq.) in accordance with Section 15321(a)(2), Title 14, California Code of Regulations.

IT IS HEREBY ORDERED, pursuant to CWC Section 13385, the Discharger is assessed \$142,000 in ACL (MMP) for the violations set forth in Attachment “A”. In lieu of paying an ACL in the amount of \$142,000, the Discharger shall pay a reduced penalty amount in accordance with CWC Section 13385(l) and shall implement the proposed SEP described in Attachment “D” in accordance with the following:

1. The Discharger shall comply with the State Board Enforcement Policy relating to implementation of SEPs.
2. The SEP shall be implemented in accordance with the time schedule stipulated in Attachment “E”, appended to and made a part of this Order by reference. The Regional Board Executive Officer may modify the stipulated completion date and approve an alternative completion date for the SEP if he determines that a delay is necessary for a timely return of the Discharger to full and sustained compliance with its WDR, and is beyond the reasonable control of the Discharger. Under no circumstances may the completion date extend beyond five (5) years from the date of this Order.

3. The suspended portion of the proposed ACL penalty of \$142,000 that is hereby directed to be expended on the SEP cannot exceed \$78,500, which is calculated as follows:

$$[\$15,000 + 0.5(\$142,000 - \$15,000)] = \$78,500$$

Upon completion of the SEP and no later than **October 31, 2007**, Coachella Sanitary District shall submit verification of the actual amount of money spent by Coachella Sanitary District toward completion of the SEP.

4. The discharger shall pay within thirty (30) days of the date of this Order the remaining portion of \$63,500. Payment by check of this amount shall be made payable to the "State Water Pollution Cleanup and Abatement Account" and mailed to the address shown in paragraph 8 below.
5. If the Discharger completes a stipulated phase of the SEP to the satisfaction of the Executive Officer by the approved date, the corresponding portion of the ACL indicated in Attachment "E", \$78,500, shall be permanently suspended. Similarly, if the Discharger fails to complete any stipulated phase of the SEP to the satisfaction of the Executive Officer by the approved date, and the Executive Officer has not approved an extension in the completion date, the corresponding portion of the ACL shall become due and payable by the Discharger within 30 days of being so informed in writing.
6. Previously suspended amounts do not relieve the discharger of the independent obligation to take necessary actions to achieve compliance.
7. Completion of the SEP shall be certified in writing by the Executive Officer. No portion of the ACL shall be suspended without a written certification issued by the Executive Officer.
8. The Discharger shall submit all unsuspended ACL amounts, made payable to the "State Water Pollution Cleanup and Abatement Account", to the following address:

California Regional Water Quality Control Board
Colorado River Basin Region
73-720 Fred Waring Drive, Suite 100
Palm Desert, CA 92260

I, Robert Perdue, Executive Officer, do hereby certify the foregoing is a full, true and correct copy of an Order adopted by the California Regional Water Quality Control Board, Colorado River Basin Region, on May 16, 2007.


ROBERT PERDUE, Executive Officer

ATTACHMENT "A"

Attachment A - Serious and Chronic Violations							
Violation No.	Description of Violation	Date Occurred	Number of days to be used for assessing maximum liability	Amount of Wastewater Discharged (gpd) in excess of 1,000 gal, and not cleaned up	Is it Serious or Chronic Violation as Defined by CWC 13395(f) or 13395(f)?	Minimum Liability Board Must Assess	Maximum Liability Available (MLA) to Board
364182	Exceeded Average Monthly Flow Limit for the oxidation pond system of 0.9 MGD. Flow Reported as 1.1 MGD.	7/31/2005	31	199000	No (it's a supporting Violation)	\$0	\$62,000,000
364188	Exceeded Average Monthly Flow Limit for the activated sludge system of 1.5 MGD. Flow Reported as 1.6 MGD.	7/31/2005	31	99000	No (it's a supporting Violation)	\$0	\$31,000,000
364189	Exceeded maximum daily of Bis (2-Ethylhexyl) Phthalate Limit = 0.17 lbs/day Reported as 0.18 lbs/day; Discharged Flow = 2.7 mgd	7/31/2005	1	2699000	No (it's a supporting Violation)	\$0	\$27,000,000
364193	Exceeded Average Monthly Effluent Limit of 0.9 MGD Flow Reported as 1.0 MGD	8/31/2005	31	99000	Yes	\$3,000	\$31,000,000
364398	Exceeded interim maximum daily of 150 µg/L Zinc Reported as 170 µg/L; Discharged Flow = 2.4 mgd	10/17/2005	1	2399000	Yes	\$3,000	\$24,000,000
364400	Exceeded interim average daily of 3 lbs/day Zinc. Calculated as 4 lbs/day; Avg. monthly flow discharged = 2.5 mgd	10/17/2005	1	284374	Yes	\$3,000	\$2,853,738
364399	Exceeded interim average monthly of 150 µg/L Zinc Reported as 170 µg/L; Avg. monthly flow discharged = 2.4 mgd	10/31/2005	31	2399000	Yes	\$3,000	\$744,000,000
364203	Exceeded Ave. Monthly Effluent Limit for the activated sludge system of 1.5 MGD Flow Reported as 1.6 MGD	12/31/2005	31	99000	Yes	\$3,000	\$31,000,000
408839	Exceeded Average Monthly Effluent Limit for the oxidation pond system of 0.9 MGD Flow Reported as 1.1 MGD	2/28/2006	28	199000	Yes	\$3,000	\$56,000,000

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408947	Exceeded Average Monthly Effluent Limit for TSS of 36 mg/l for the combined flow from the oxidation pond and the activated sludge systems. TSS reported = 42 mg/l; Avg. monthly flow discharged = 2.6 mgd	2/29/2006	28	2599000	Yes	\$3,000	\$728,000,000
408950	Exceeded Average Monthly mass based effluent limit for TSS of 720 lbs/day for the combined flow from the oxidation pond and the activated sludge systems. TSS calculated = 911 lbs/day; Avg. monthly flow discharged = 2.8 mgd	2/29/2006	28	543936	Yes	\$3,000	\$152,582,026
408953	Exceeded Average weekly effluent limit for TSS of 52 mg/l for the combined flow from the oxidation pond and the activated sludge systems. TSS calculated = 56 mg/l; Avg. weekly flow discharged = 2.5 mgd	2/25/2006	7	2489000	Yes	\$3,000	\$175,000,000
408956	Exceeded Average weekly mass based effluent limit for TSS of 1041 lbs/day for the combined flow from the oxidation pond and the activated sludge systems. TSS calculated = 1168 lbs/day; Avg. weekly flow discharged = 2.5 mgd	2/25/2006	7	270755	Yes	\$3,000	\$19,022,825
408962	Exceeded average monthly discharge flow limit from the oxidation pond system of 0.9 MGD Flow Reported as 1.0 MGD	3/31/2006	31	98000	Yes	\$3,000	\$31,000,000
408968	Exceeded average monthly discharge flow from the activated sludge system of 1.5 MGD flow. Reported flow is = 1.6 MGD	3/31/2006	31	98000	Yes	\$3,000	\$31,000,000

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408974	Exceeded average monthly discharge flow limit from the oxidation pond system of 0.9 MGD Flow Reported as 1.0 MGD	4/30/2006	30	99000	Yes	\$3,000	\$30,000,000
408317	Exceeded Average weekly effluent limit for TSS of 52 mg/l for the combined flow from the oxidation pond and the activated sludge systems. TSS calculated = 53 mg/l; Avg. weekly flow discharged = 2.6 mgd	4/15/2006	7	2599000	Yes	\$3,000	\$182,000,000
408318	Exceeded Average weekly mass based effluent limit for TSS of 1041 lbs/day for the combined flow from the oxidation pond and the activated sludge systems. TSS calculated = 1149 lbs/day; Avg. weekly flow discharged = 2.6 mgd	4/15/2006	7	243179	Yes	\$3,000	\$17,092,563
408319	Exceeded Average Monthly Effluent Limit for TSS of 36 mg/l for the combined flow from the oxidation pond and the activated sludge systems. TSS reported = 39 mg/l; Avg. monthly flow discharged = 2.5 mgd	4/30/2006	30	2499000	Yes	\$3,000	\$750,000,000
408320	Exceeded Average Monthly mass based effluent limit for TSS of 720 lbs/day for the combined flow from the oxidation pond and the activated sludge systems. TSS calculated = 813 lbs/day; Avg. monthly flow discharged = 2.5 mgd	4/30/2006	30	284746	Yes	\$3,000	\$85,723,691
408321	Exceeded average monthly of Bis (2-Ethylhexyl) Phthalate Limit = 8.5 µg/L. Reported as 11 µg/L; Avg. monthly flow discharged = 2.5 mgd	4/30/2006	30	2499000	Yes	\$3,000	\$750,000,000

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408323	Exceeded maximum daily of Bis (2-Ethylhexyl) Phthalate Limit = 0.17 lbs/day calculated as 0.23 lbs/day; Discharged/Flow = 2.4 mgd	4/30/2006	1	2399000	Yes	\$3,000	\$24,000,000
427379	Exceeded average monthly discharge flow limit from the oxidation pond system of 0.9 MGD Flow Reported as 1.0 MGD	5/31/2006	31	199000	Yes	\$3,000	\$62,000,000
427285	Exceeded average monthly discharge flow limit from the oxidation pond system of 0.9 MGD Flow Reported as 1.3 MGD	6/30/2006	30	399000	Yes	\$3,000	\$120,000,000
427286	The activated Sludge Treatment System failed to remove the minimum 85% of TSS as required. Reported 74% TSS Removal for the month; Avg. monthly flow discharged from activated sludge plant = 1.4 mgd	6/30/2006	30	1399000	Yes	\$3,000	\$420,000,000
427287	Exceeded Average weekly effluent limit for BOD of 52 mg/l for the combined flow from the oxidation pond and the activated sludge systems. Ave. weekly BOD calculated = 63 mg/l; Avg. weekly flow discharged = 2.7 mgd	6/17/2006	7	2699000	Yes	\$3,000	\$189,000,000
427358	Exceeded Average weekly effluent limit for BOD of 52 mg/l for the combined flow from the oxidation pond and the activated sludge systems. Ave. weekly BOD calculated = 64 mg/l; Avg. weekly flow discharged = 2.6 mgd	6/24/2006	7	2599000	Yes	\$3,000	\$182,000,000

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427359	Exceeded Average weekly effluent limit for BOD of 1,041 lbs/day for the combined flow from the oxidation pond and the activated sludge systems. Ave. weekly BOD calculated = 1,419 lbs/day; Avg. weekly flow discharged = 2.7 mgd;	6/17/2006	7	717973	Yes	\$3,000	\$50,328,103
427380	Exceeded Average Monthly Effluent Limit for BOD of 36 mg/l for the combined flow from the oxidation pond and the activated sludge systems. Ave. weekly BOD calculated = 1,388 lbs/day; Avg. weekly flow discharged = 2.6 mgd	6/24/2006	7	648697	Yes	\$3,000	\$45,478,780
427361	Exceeded Average Monthly Effluent Limit for BOD of 36 mg/l for the combined flow from the oxidation pond and the activated sludge systems. The average monthly BOD concentration was 43 mg/l; Avg. monthly flow discharged = 2.7 mgd	6/30/2006	30	2699000	Yes	\$3,000	\$810,000,000
427362	Exceeded average monthly mass based effluent limit for BOD of 720 lbs/day for the combined flow from the oxidation pond and the activated sludge systems. Ave. monthly mass based effluent BOD was 988 lbs/day; Avg. monthly flow discharged = 2.7 mgd	6/30/2006	30	690106	Yes	\$3,000	\$207,391,719
427363	Exceeded Average weekly effluent limit for TSS of 52 mg/l for the combined flow from the oxidation pond and the activated sludge systems. TSS calculated = 53 mg/l; Avg. weekly flow discharged = 2.6 mgd	6/3/2006	7	2599000	Yes	\$3,000	\$182,000,000

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427384	Exceeded Average weekly effluent limit for TSS of 52 mg/l for the combined flow from the oxidation pond and the activated sludge systems. TSS calculated = 57 mg/l; Avg. weekly flow discharged = 2.5 mgd	6/10/2006	7	2489000	Yes	\$3,000	\$175,000,000
427385	Exceeded Average weekly mass based effluent limit for TSS of 1041 lbs/day for the combined flow from the oxidation pond and the activated sludge systems. TSS calculated = 1149 lbs/day; Discharged Flow = 2.7 mgd; Avg. weekly flow discharged = 2.6 mgd	6/3/2006	7	243179	Yes	\$3,000	\$17,082,583
427386	Exceeded Average Monthly Effluent Limit for TSS of 36 mg/l for the combined flow from the oxidation pond and the activated sludge systems. Ave. monthly TSS concentration was 44 mg/l; Avg. monthly flow discharged = 2.5 mgd	6/10/2006	7	308032	Yes	\$3,000	\$21,632,255
427367	Exceeded Average Monthly mass based effluent limit for TSS of 720 lbs/day for the combined flow from the oxidation pond and the activated sludge systems. TSS calculated = 891 lbs/day; Avg. monthly flow discharged = 2.7 mgd	6/30/2006	7	2689000	Yes	\$3,000	\$189,000,000
427368	Exceeded Average Monthly mass based effluent limit for TSS of 720 lbs/day for the combined flow from the oxidation pond and the activated sludge systems. TSS calculated = 891 lbs/day; Avg. monthly flow discharged = 2.7 mgd	6/30/2006	30	737037	Yes	\$3,000	\$221,410,971

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427369	Exceeded interim maximum daily Copper limit of 12 µg/L for the combined flow from the oxidation pond and the activated sludge systems. Interim maximum daily Copper limit reported as 16 µg/L; Discharged Flow = 2.7 mgd	6/14/2006	1	2699000	Yes	\$3,000	\$27,000,000
427370	Exceeded interim maximum daily Copper limit of 0.24 lbs/day for the combined flow from the oxidation pond and the activated sludge systems. Interim maximum daily Copper limit reported as 0.37 lbs/day; Discharged Flow = 2.7 mgd	6/14/2006	1	2699000	Yes	\$3,000	\$27,000,000
427371	Exceeded average interim monthly Copper limit of 12 µg/L for the combined flow from the oxidation pond and the activated sludge systems. Ave interim monthly Cu reported as 16 µg/L; Avg. monthly flow discharged = 2.7 mgd	6/30/2006	30	2699000	Yes	\$3,000	\$810,000,000
427372	Exceeded maximum daily Interim of Bis (2-Ethylhexyl) Phthalate Limit of 11.8 µg/L for the combined flow from the oxidation pond and the activated sludge systems. Max. daily Interim of Bis (2-Ethylhexyl) Phthalate reported as 12 µg/L; Discharged Flow = 2.7 mgd	6/30/2006	30	897716	Yes	\$3,000	\$269,614,836
427373	Exceeded maximum daily Interim of Bis (2-Ethylhexyl) Phthalate reported as 12 µg/L; Discharged Flow = 2.7 mgd	6/14/2006	1	2699000	Yes	\$3,000	\$27,000,000

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427374	Exceeded maximum daily Interim of Bis (2-Ethylhexyl) Phthalate Limit = 0.24 lbs/day for the combined flow from the oxidation pond and the activated sludge systems. Maximum daily Interim of Bis (2-Ethylhexyl) Phthalate Reported as 0.28 lbs/day. Discharged Flow = 2.7 mgd	6/14/2006	1	2699000	Yes	\$3,000	\$27,000,000
427375	Exceeded average monthly Interim limit of 8.5 µg/L Bis (2-Ethylhexyl) Phthalate for the combined flow from the oxidation pond and the activated sludge systems. Ave. monthly Interim limit for Bis (2-Ethylhexyl) Phthalate was reported as 12 µg/L. Avg. monthly flow discharged = 2.7 mgd	6/30/2006	30	2699000	Yes	\$3,000	\$810,000,000
427376	Exceeded average monthly Interim limit of 0.17 lbs/day Bis(2-Ethylhexyl) Phthalate for the combined flow from the oxidation pond and the activated sludge systems. Average monthly Interim limit for Bis(2-Ethylhexyl) Phthalate was reported as 0.27 lbs/day. Avg. monthly flow discharged = 2.7 mgd	6/30/2006	30	997573	Yes	\$3,000	\$298,572,000
436347	Exceeded average monthly discharge flow limit from the oxidation pond system of 0.9 MGD. Flow Reported as 1.2 MGD	7/31/2006	31	299000	Yes	\$3,000	\$93,000,000
436349	Failed to satisfy the percentage removal TSS rate of 85 % for the activated sludge system for the month. %TSS reported = 79%; Avg. monthly flow discharged = 2.6 mgd	7/31/2006	31	1399000	Yes	\$3,000	\$494,000,000
Totals =						\$132,000	\$9,638,736,110

ATTACHMENT "B"

Attachment B - Other Non-serious, Non-chronic Violations					
Violation No.	Description of Violation	Date Occurred	Is it Serious or Chronic Violation as Defined by CWC 13365(f)?	Minimum Liability Board Must Assess	Maximum Liability Available to Board per CWC 13365(e)
364191	Incomplete report, failed to monitor the effluent BOD ₅ and Total Suspended Solids (TSS) at the minimum frequency specified in Order No. R7-2005-0083	7/31/2005	No	NA	\$10,000
CSD-T1	Incomplete report, failed to monitor the combined effluent from the activated sludge and the oxidation ponds for TSS twice a week as specified in Order No. R7-2005-0083. TSS were monitored once a month.	7/8/2005	No	NA	\$10,000
CSD-T2	Incomplete report, failed to monitor the combined effluent from the activated sludge and the oxidation ponds for TSS twice a week as specified in Order No. R7-2005-0083. TSS were monitored once a month.	7/8/2005	No	NA	\$10,000
CSD-T3	Incomplete report, failed to monitor the combined effluent from the activated sludge and the oxidation ponds for TSS twice a week as specified in Order No. R7-2005-0083. TSS were monitored once a month.	7/15/2005	No	NA	\$10,000
CSD-T4	Incomplete report, failed to monitor the combined effluent from the activated sludge and the oxidation ponds for TSS twice a week as specified in Order No. R7-2005-0083. TSS were monitored once a month.	7/15/2005	No	NA	\$10,000
CSD-T5	Incomplete report, failed to monitor the combined effluent from the activated sludge and the oxidation ponds for TSS twice a week as specified in Order No. R7-2005-0083. TSS were monitored once a month.	7/22/2005	No	NA	\$10,000
CSD-T6	Incomplete report, failed to monitor the combined effluent from the activated sludge and the oxidation ponds for TSS twice a week as specified in Order No. R7-2005-0083. TSS were monitored once a month.	7/22/2005	No	NA	\$10,000

Attachment B - Other Non-serious, Non-chronic Violations					
Violation No.	Description of Violation	Date Occurred	Is it Serious or Chronic Violation as Defined by CWC 13395(f)?	Minimum Liability Board Must Assess	Maximum Liability Available to Board per CWC 13395(c)
CSD-T7	Incomplete report, failed to monitor the combined effluent from the activated sludge and the oxidation ponds for TSS twice a week as specified in Order No. R7-2005-0083. TSS were monitored once a month.	7/31/2005	No	NA	\$10,000
CSD-T8	Incomplete report, failed to monitor the combined effluent from the activated sludge and the oxidation ponds for BOD weekly as specified in Order No. R7-2005-0083. BOD was monitored once a month.	7/8/2005	No	NA	\$10,000
CSD-T9	Incomplete report, failed to monitor the combined effluent from the activated sludge and the oxidation ponds for BOD weekly as specified in Order No. R7-2005-0083. BOD was monitored once a month.	7/15/2005	No	NA	\$10,000
CSD-T10	Incomplete report, failed to monitor the combined effluent from the activated sludge and the oxidation ponds for BOD weekly as specified in Order No. R7-2005-0083. BOD was monitored once a month.	7/22/2005	No	NA	\$10,000
364197	Incomplete report, failed to monitor the effluent BOD ₅ , TSS, and ammonia nitrogen at the minimum frequency specified in Order No. R7-2005-0083	8/31/2005	No	NA	\$10,000
CSD-T11	Incomplete report, failed to monitor the combined effluent from the activated sludge and the oxidation ponds for TSS twice a week as specified in Order No. R7-2005-0083. TSS were monitored once a month.	8/12/2005	No	NA	\$10,000
CSD-T12	Incomplete report, failed to monitor the combined effluent from the activated sludge and the oxidation ponds for TSS twice a week as specified in Order No. R7-2005-0083. TSS were monitored once a month.	8/12/2005	No	NA	\$10,000

Attachment B - Other Non-serious, Non-chronic Violations					
Violation No.	Description of Violation	Date Occurred	Is it Serious or Chronic Violation as Defined by CWC 13385(h)?	Minimum Liability Board Must Assess	Maximum Liability Available to Board per CWC 13385(e)
CSD-T13	Incomplete report, failed to monitor the combined effluent from the activated sludge and the oxidation ponds for TSS twice a week as specified in Order No. R7-2005-0083. TSS were monitored once a month.	8/19/2005	No	NA	\$10,000
CSD-T14	Incomplete report, failed to monitor the combined effluent from the activated sludge and the oxidation ponds for TSS twice a week as specified in Order No. R7-2005-0083. TSS were monitored once a month.	8/19/2005	No	NA	\$10,000
CSD-T15	Incomplete report, failed to monitor the combined effluent from the activated sludge and the oxidation ponds for TSS twice a week as specified in Order No. R7-2005-0083. TSS were monitored once a month.	8/26/2005	No	NA	\$10,000
CSD-T16	Incomplete report, failed to monitor the combined effluent from the activated sludge and the oxidation ponds for TSS twice a week as specified in Order No. R7-2005-0083. TSS were monitored once a month.	8/26/2005	No	NA	\$10,000
CSD-T17	Incomplete report, failed to monitor the combined effluent from the activated sludge and the oxidation ponds for TSS twice a week as specified in Order No. R7-2005-0083. TSS were monitored once a month.	8/31/2005	No	NA	\$10,000
CSD-T18	Incomplete report, failed to monitor the combined effluent from the activated sludge and the oxidation ponds for BOD weekly as specified in Order No. R7-2005-0083. BOD was monitored once a month.	8/12/2005	No	NA	\$10,000
CSD-T19	Incomplete report, failed to monitor the combined effluent from the activated sludge and the oxidation ponds for BOD weekly as specified in Order No. R7-2005-0083. BOD was monitored once a month.	8/19/2005	No	NA	\$10,000

Attachment B - Other Non-serious, Non-chronic Violations						
Violation No.	Description of Violation	Date Occurred	Is it Serious or Chronic Violation as Defined by CWC 13395(f)?	Minimum Liability Board Must Assess	Maximum Liability Available to Board per CWC 13395(e)	
CSD-T20	Incomplete report, failed to monitor the combined effluent from the activated sludge and the oxidation ponds for BOD weekly as specified in Order No. R7-2005-0083. BOD was monitored once a month.	8/26/2005	No	NA	\$10,000	
CSD-T21	Incomplete report, failed to monitor the combined effluent from the activated sludge and the oxidation ponds for ammonia nitrogen twice per month as specified in Order No. R7-2005-0083. Ammonia nitrogen was monitored once a month.	8/31/2005	No	NA	\$10,000	
364199	Incomplete report, failed to monitor the effluent BOD ₅ and TSS at the minimum frequency specified in Order No. R7-2005-0083.	9/30/2005	No	NA	\$10,000	
CSD-T22	Incomplete report, failed to monitor the combined effluent from the activated sludge and the oxidation ponds for TSS twice a week as specified in Order No. R7-2005-0083. TSS were monitored once a month.	9/9/2005	No	NA	\$10,000	
CSD-T23	Incomplete report, failed to monitor the combined effluent from the activated sludge and the oxidation ponds for TSS twice a week as specified in Order No. R7-2005-0083. TSS were monitored once a month.	9/9/2005	No	NA	\$10,000	
CSD-T24	Incomplete report, failed to monitor the combined effluent from the activated sludge and the oxidation ponds for TSS twice a week as specified in Order No. R7-2005-0083. TSS were monitored once a month.	9/16/2005	No	NA	\$10,000	
CSD-T25	Incomplete report, failed to monitor the combined effluent from the activated sludge and the oxidation ponds for TSS twice a week as specified in Order No. R7-2005-0083. TSS were monitored once a month.	9/16/2005	No	NA	\$10,000	

Attachment B - Other Non-serious, Non-chronic Violations					
Violation No.	Description of Violation	Date Occurred	Is It Serious or Chronic Violation as Defined by CWC 13385(h)?	Minimum Liability Board Must Assess	Maximum Liability Available to Board per CWC 13385(g)
CSD-T26	Incomplete report, failed to monitor the combined effluent from the activated sludge and the oxidation ponds for TSS twice a week as specified in Order No. R7-2005-0083. TSS were monitored once a month.	9/23/2005	No	NA	\$10,000
CSD-T27	Incomplete report, failed to monitor the combined effluent from the activated sludge and the oxidation ponds for TSS twice a week as specified in Order No. R7-2005-0083. TSS were monitored once a month.	9/23/2005	No	NA	\$10,000
CSD-T28	Incomplete report, failed to monitor the combined effluent from the activated sludge and the oxidation ponds for TSS twice a week as specified in Order No. R7-2005-0083. TSS were monitored once a month.	9/30/2005	No	NA	\$10,000
CSD-T29	Incomplete report, failed to monitor the combined effluent from the activated sludge and the oxidation ponds for BOD weekly as specified in Order No. R7-2005-0083. BOD was monitored once a month.	9/9/2005	No	NA	\$10,000
CSD-T30	Incomplete report, failed to monitor the combined effluent from the activated sludge and the oxidation ponds for BOD weekly as specified in Order No. R7-2005-0083. BOD was monitored once a month.	9/16/2005	No	NA	\$10,000
CSD-T31	Incomplete report, failed to monitor the combined effluent from the activated sludge and the oxidation ponds for BOD weekly as specified in Order No. R7-2005-0083. BOD was monitored once a month.	9/23/2005	No	NA	\$10,000
364401	Incomplete report, failed to monitor the effluent BOD ₅ and TSS at the minimum frequency specified in Order No. R7-2005-0083	10/31/2005	No	NA	\$10,000

Attachment B - Other Non-serious, Non-chronic Violations					
Violation No.	Description of Violation	Date Occurred	Is it Serious or Chronic Violation as Defined by CWC 13395(h)?	Minimum Liability Board Must Assess	Maximum Liability Available to Board per CWC 13395(e)
CSD-T32	Incomplete report, failed to monitor the combined effluent from the activated sludge and the oxidation ponds for TSS twice a week as specified in Order No. R7-2005-0083. TSS were monitored three x/month.	10/7/2005	No	NA	\$10,000
CSD-T33	Incomplete report, failed to monitor the combined effluent from the activated sludge and the oxidation ponds for TSS twice a week as specified in Order No. R7-2005-0083. TSS were monitored three x/month.	10/7/2005	No	NA	\$10,000
CSD-T34	Incomplete report, failed to monitor the combined effluent from the activated sludge and the oxidation ponds for TSS twice a week as specified in Order No. R7-2005-0083. TSS were monitored three x/month.	10/14/2005	No	NA	\$10,000
CSD-T35	Incomplete report, failed to monitor the combined effluent from the activated sludge and the oxidation ponds for TSS twice a week as specified in Order No. R7-2005-0083. TSS were monitored three x/month.	10/21/2005	No	NA	\$10,000
CSD-T36	Incomplete report, failed to monitor the combined effluent from the activated sludge and the oxidation ponds for TSS twice a week as specified in Order No. R7-2005-0083. TSS were monitored three x/month.	10/31/2005	No	NA	\$10,000
CSD-T37	Incomplete report, failed to monitor the combined effluent from the activated sludge and the oxidation ponds for BOD weekly as specified in Order No. R7-2005-0083. BOD was monitored twice a month.	10/7/2005	No	NA	\$10,000
CSD-T38	Incomplete report, failed to monitor the combined effluent from the activated sludge and the oxidation ponds for BOD weekly as specified in Order No. R7-2005-0083. BOD was monitored twice a month.	10/21/2005	No	NA	\$10,000

Attachment B - Other Non-serious, Non-chronic Violations						
Violation No.	Description of Violation	Date Occurred	Is it Serious or Chronic Violation as Defined by CWC 13395(h)?	Minimum Liability Board Must Assess	Maximum Liability Available to Board per CWC 13395(e)	
364202	Incomplete report, failed to monitor the effluent TSS, and BOD ₅ at the minimum frequency specified in Order No. R7-2005-0083	11/30/2005	No	NA	\$10,000	
CSD-T39	Incomplete report, failed to monitor the combined effluent from the activated sludge and the oxidation ponds for TSS twice a week as specified in Order No. R7-2005-0083. TSS were monitored four times a month.	11/4/2005	No	NA	\$10,000	
CSD-T40	Incomplete report, failed to monitor the combined effluent from the activated sludge and the oxidation ponds for TSS twice a week as specified in Order No. R7-2005-0083. TSS were monitored four times a month.	11/11/2005	No	NA	\$10,000	
CSD-T41	Incomplete report, failed to monitor the combined effluent from the activated sludge and the oxidation ponds for TSS twice a week as specified in Order No. R7-2005-0083. TSS were monitored four times a month.	11/25/2005	No	NA	\$10,000	
CSD-T42	Incomplete report, failed to monitor the combined effluent from the activated sludge and the oxidation ponds for TSS twice a week as specified in Order No. R7-2005-0083. TSS were monitored four times a month.	11/25/2005	No	NA	\$10,000	
CSD-T43	Incomplete report, failed to monitor the combined effluent from the activated sludge and the oxidation ponds for BOD weekly as specified in Order No. R7-2005-0083. BOD was monitored twice a month.	11/18/2005	No	NA	\$10,000	
CSD-T44	Incomplete report, failed to monitor the combined effluent from the activated sludge and the oxidation ponds for BOD weekly as specified in Order No. R7-2005-0083. BOD was monitored twice a month.	11/25/2005	No	NA	\$10,000	

Attachment B - Other Non-serious, Non-chronic Violations					
Violation No.	Description of Violation	Date Occurred	Is it Serious or Chronic Violation as Defined by CWC 13385(h)?	Minimum Liability Board Must Assess	Maximum Liability Available to Board per CWC 13385(c)
364205	Incomplete report, failed to monitor the effluent TSS and BOD ₅ at the minimum frequency specified in Order No. R7-2005-0083	12/31/2005	No	NA	\$10,000
CSD-T45	Incomplete report, failed to monitor the combined effluent from the activated sludge and the oxidation ponds for TSS twice a week as specified in Order No. R7-2005-0083. TSS were monitored once a month.	12/9/2005	No	NA	\$10,000
CSD-T46	Incomplete report, failed to monitor the combined effluent from the activated sludge and the oxidation ponds for TSS twice a week as specified in Order No. R7-2005-0083. TSS were monitored once a month.	12/9/2005	No	NA	\$10,000
CSD-T47	Incomplete report, failed to monitor the combined effluent from the activated sludge and the oxidation ponds for TSS twice a week as specified in Order No. R7-2005-0083. TSS were monitored once a month.	12/16/2005	No	NA	\$10,000
CSD-T48	Incomplete report, failed to monitor the combined effluent from the activated sludge and the oxidation ponds for TSS twice a week as specified in Order No. R7-2005-0083. TSS were monitored once a month.	12/16/2005	No	NA	\$10,000
CSD-T49	Incomplete report, failed to monitor the combined effluent from the activated sludge and the oxidation ponds for TSS twice a week as specified in Order No. R7-2005-0083. TSS were monitored once a month.	12/23/2005	No	NA	\$10,000
CSD-T50	Incomplete report, failed to monitor the combined effluent from the activated sludge and the oxidation ponds for TSS twice a week as specified in Order No. R7-2005-0083. TSS was monitored once a month.	12/23/2005	No	NA	\$10,000

Attachment B - Other Non-serious, Non-chronic Violations						
Violation No.	Description of Violation	Date Occurred	Is it Serious or Chronic Violation as Defined by CWC 13385(h)?	Minimum Liability Board Must Assess	Maximum Liability Available to Board per CWC 13385(e)	
CSD-T51	Incomplete report, failed to monitor the combined effluent from the activated sludge and the oxidation ponds for TSS twice a week as specified in Order No. R7-2005-0083. TSS was monitored once a month.	12/31/2005	No	NA	\$10,000	
CSD-T52	Incomplete report, failed to monitor the combined effluent from the activated sludge and the oxidation ponds for the 126 priority pollutants annually as specified in Order No. R7-2005-0083.	12/31/2005	No	NA	\$10,000	
CSD-T53	Incomplete report, failed to monitor the combined effluent from the activated sludge and the oxidation ponds for BOD weekly as specified in Order No. R7-2005-0083. BOD was monitored once a month.	12/9/2005	No	NA	\$10,000	
CSD-T54	Incomplete report, failed to monitor the combined effluent from the activated sludge and the oxidation ponds for BOD weekly as specified in Order No. R7-2005-0083. BOD was monitored once a month.	12/16/2005	No	NA	\$10,000	
408937	Incomplete report, failed to monitor the effluent TSS and BOD ₅ at the minimum frequency specified in Order No. R7-2005-0083	1/31/2006	No	NA	\$10,000	
CSD-T55	Incomplete report, failed to monitor the combined effluent from the activated sludge and the oxidation ponds for TSS twice a week as specified in Order No. R7-2005-0083. TSS were monitored twice a month.	1/7/2006	No	NA	\$10,000	
CSD-T56	Incomplete report, failed to monitor the combined effluent from the activated sludge and the oxidation ponds for TSS twice a week as specified in Order No. R7-2005-0083. TSS were monitored twice a month.	1/7/2006	No	NA	\$10,000	

Attachment B - Other Non-serious, Non-chronic Violations						
Violation No.	Description of Violation	Date Occurred	Is it Serious or Chronic Violation as Defined by CWC 13395(h)?	Minimum Liability Board Must Assess	Maximum Liability Available to Board per CWC 13395(e)	
CSD-T57	Incomplete report, failed to monitor the combined effluent from the activated sludge and the oxidation ponds for TSS twice a week as specified in Order No. R7-2005-0083. TSS were monitored twice a month.	1/14/2006	No	NA	\$10,000	
CSD-T58	Incomplete report, failed to monitor the combined effluent from the activated sludge and the oxidation ponds for TSS twice a week as specified in Order No. R7-2005-0083. TSS were monitored twice a month.	1/21/2006	No	NA	\$10,000	
CSD-T59	Incomplete report, failed to monitor the combined effluent from the activated sludge and the oxidation ponds for TSS twice a week as specified in Order No. R7-2005-0083. TSS were monitored twice a month.	1/28/2006	No	NA	\$10,000	
CSD-T60	Incomplete report, failed to monitor the combined effluent from the activated sludge and the oxidation ponds for TSS twice a week as specified in Order No. R7-2005-0083. TSS were monitored twice a month.	1/28/2006	No	NA	\$10,000	
CSD-T61	Incomplete report, failed to monitor the combined effluent from the activated sludge and the oxidation ponds for BOD weekly as specified in Order No. R7-2005-0083. BOD was monitored once a month.	1/7/2006	No	NA	\$10,000	
CSD-T62	Incomplete report, failed to monitor the combined effluent from the activated sludge and the oxidation ponds for BOD weekly as specified in Order No. R7-2005-0083. BOD was monitored once a month.	1/21/2006	No	NA	\$10,000	
CSD-T63	Incomplete report, failed to monitor the combined effluent from the activated sludge and the oxidation ponds for BOD weekly as specified in Order No. R7-2005-0083. BOD was monitored once a month.	1/28/2006	No	NA	\$10,000	

Attachment B - Other Non-serious, Non-chronic Violations						
Violation No.	Description of Violation	Date Occurred	Is it Serious or Chronic Violation as Defined by CWC 13385(h)?	Minimum Liability Board Must Assess	Maximum Liability Available to Board per CWC 13385(c)	
408943	Incomplete report, failed to monitor the effluent TSS and BOD ₅ at the minimum frequency specified in Order No. R7-2005-0083	2/28/2006	No	NA	\$10,000	
CSD-T64	Incomplete report, failed to monitor the combined effluent from the activated sludge and the oxidation ponds for TSS twice a week as specified in Order No. R7-2005-0083. TSS were monitored once a month.	2/4/2006	No	NA	\$10,000	
CSD-T65	Incomplete report, failed to monitor the combined effluent from the activated sludge and the oxidation ponds for TSS twice a week as specified in Order No. R7-2005-0083. TSS were monitored once a month.	2/4/2006	No	NA	\$10,000	
CSD-T66	Incomplete report, failed to monitor the combined effluent from the activated sludge and the oxidation ponds for TSS twice a week as specified in Order No. R7-2005-0083. TSS were monitored once a month.	2/11/2006	No	NA	\$10,000	
CSD-T67	Incomplete report, failed to monitor the combined effluent from the activated sludge and the oxidation ponds for TSS twice a week as specified in Order No. R7-2005-0083. TSS were monitored once a month.	2/11/2006	No	NA	\$10,000	
CSD-T68	Incomplete report, failed to monitor the combined effluent from the activated sludge and the oxidation ponds for TSS twice a week as specified in Order No. R7-2005-0083. TSS were monitored once a month.	2/18/2006	No	NA	\$10,000	
CSD-T69	Incomplete report, failed to monitor the combined effluent from the activated sludge and the oxidation ponds for TSS twice a week as specified in Order No. R7-2005-0083. TSS were monitored once a month.	2/18/2006	No	NA	\$10,000	

Attachment B - Other Non-serious, Non-chronic Violations						
Violation No.	Description of Violation	Date Occurred	Is it Serious or Chronic Violation as Defined by CWC 13385(h)?	Minimum Liability Board Must Assess	Maximum Liability Available to Board per CWC 13385(e)	
CSD-170	Incomplete report, failed to monitor the combined effluent from the activated sludge and the oxidation ponds for TSS twice a week as specified in Order No. R7-2005-0083. TSS were monitored once a month.	2/28/2006	No	NA	\$10,000	
CSD-171	Incomplete report, failed to monitor the combined effluent from the activated sludge and the oxidation ponds for BOD weekly as specified in Order No. R7-2005-0083. BOD was monitored once a month.	2/4/2006	No	NA	\$10,000	
CSD-172	Incomplete report, failed to monitor the combined effluent from the activated sludge and the oxidation ponds for BOD weekly as specified in Order No. R7-2005-0083. BOD was monitored once a month.	2/11/2006	No	NA	\$10,000	
CSD-173	Incomplete report, failed to monitor the combined effluent from the activated sludge and the oxidation ponds for BOD weekly as specified in Order No. R7-2005-0083. BOD was monitored once a month.	2/18/2006	No	NA	\$10,000	
CSD-174	Incomplete report, failed to monitor the combined effluent from the activated sludge and the oxidation ponds for Copper as specified in Order No. R7-2005-0083.	2/28/2006	No	NA	\$10,000	
CSD-175	Incomplete report, failed to monitor the combined effluent from the activated sludge and the oxidation ponds for Zinc as specified in Order No. R7-2005-0083.	2/28/2006	No	NA	\$10,000	
CSD-176	Incomplete report, failed to monitor the combined effluent from the activated sludge and the oxidation ponds for nitrate as specified in Order No. R7-2005-0083.	2/28/2006	No	NA	\$10,000	
CSD-177	Incomplete report, failed to monitor the combined effluent from the activated sludge and the oxidation ponds for nitrite as specified in Order No. R7-2005-0083.	2/28/2006	No	NA	\$10,000	

Attachment B - Other Non-serious, Non-chronic Violations						
Violation No.	Description of Violation	Date Occurred	Is it Serious or Chronic Violation as Defined by CWC 13385(h)?	Minimum Liability Board Must Assess	Maximum Liability Available to Board per CWC 13385(g)	
CSD-778	Incomplete report, failed to monitor the combined effluent from the activated sludge and the oxidation ponds for total nitrogen as specified in Order No. R7-2005-0083.	2/28/2006	No	NA	\$10,000	
CSD-779	Incomplete report, failed to monitor the combined effluent from the activated sludge and the oxidation ponds for total phosphorous as specified in Order No. R7-2005-0083.	2/28/2006	No	NA	\$10,000	
CSD-790	Incomplete report, failed to monitor the combined effluent from the activated sludge and the oxidation ponds for ortho phosphate as specified in Order No. R7-2005-0083.	2/28/2006	No	NA	\$10,000	
CSD-781	Incomplete report, failed to monitor the combined effluent from the activated sludge and the oxidation ponds for Bis (2-Ethylhexyl) Phthalate as specified in Order No. R7-2005-0083.	2/28/2006	No	NA	\$10,000	
Totals =					\$690,000	

ATTACHMENT "C"

Attachment C - Sample Calculations for Maximum Liability Available to the Board

MLAQ = Maximum Liability Available to Board for monthly average flow limit violations
N = number of days for the month in question
QLavg (gpd) = Monthly average flow limit for treatment system in question
Qmavg (gpd) = Monthly average flow discharged
Qmmp (gal) = flow to be used for calculating liability = flow discharged > 1000 gal and not cleaned up = (Qmavg - 1000 gal) - QLavg
MLAQ = (N*\$10,000) + (N*Qmmp*\$10)
example for July 2006: MLAQ = (31*10,000)+(31*199,000*10) = \$62,000,000
Calculations for 2005 effluent maximum daily discharge flow limit violations
MLAD = Maximum Liability Available to Board for daily effluent limit violations
Qday (gpd) = Avg. flow discharged for the day in question
Qmmp (gpd) = flow to be used for calculating liability = flow discharged > 1000 gal and not cleaned up = (Qday - 1000 gal)
N = 1 day
MLAD = (N*\$10,000) + (N*Qmmp*\$10)
example for 7/31/2005 Bis (2-Ethylhexyl) Phthalate violation: MLAD = (1)*(\$10,000)+(1)(2699000)*(\$10) = \$27,000,000
Calculations for 2005 average weekly effluent discharge limit violations
MLAW = Maximum Liability Available to Board for avg. weekly effluent limit violation
N = 7 days
Qwavg (gpd) = Weekly average flow discharged from system and week in question
Qmmp (gpd) = flow to be used for calculating liability = flow discharged > 1000 gal and not cleaned up = (Qwavg - 1000 gal)
MLAW = (N*\$10,000) + (N*Qmmp*\$10)
example for 2/25/2006 week TSS violation: MLAW = (7)*(\$10,000)+(7)(2499000)*(\$10) = \$175,000,000
Calculations for 2005 average monthly effluent discharge limit violations
MLAM = Maximum Liability Available to Board for avg. monthly effluent limit violation
N = number of days for the month in question
Qmavg (gpd) = Monthly average flow discharged from system in question
Qmmp (gpd) = flow to be used for calculating liability = flow discharged > 1000 gal and not cleaned up = (Qmavg - 1000 gal)
MLAM = (N*\$10,000) + (N*Qmmp*\$10)
example for October 2005 Zinc violations: MLAM = (31*10,000)+(31*2399000*10) = \$744,000,000

Attachment C - Sample Calculations for Maximum Liability Available to the Board	
Calculations of MLA for violations of percent removal requirement	
MLAM = Maximum Liability Available to Board for monthly percent removal violations	
Qmavg (gpd) = Monthly average flow discharged from treatment system in question	
Qmmp (gpd) = flow to be used for calculating liability = Avg. monthly flow discharged from treatment system in question > 1000 gal = (Qmavg - 1000)	
N = number days for month in question	
MLAM = (N*\$10,000) + (N*Qmmp*\$10)	
example for 8/30/2006 TSS % removal violation: (30)(\$10,000) + (30)(1,400,000 - 1000)(\$10) = \$420,000,000	

ATTACHMENT "D"



1515 SIXTH STREET • COACHELLA, CA 92236
Fax: (760) 398-8117

Administration	398-3502	Grants	398-3502
Animal Control	398-4978	Neighborhood Svcs.	398-4978
Building	398-3002	Personnel	398-3502
City Clerk	398-3502	Planning	398-3102
City Council	398-3502	Public Works	398-5744
Code Enforcement	398-4978	Recreation	398-3502
Economic Develop.	398-3502	Riverside Sheriffs Office	863-8990
Engineering	398-5744	Sanitary	391-5008
Finance	398-3502	Senior Svcs.	398-0104
Fire	398-8895	Utilities	398-2702

April 12, 2007

Jose Angel, P.E.
Assistant Executive Officer
CA Regional Water Quality Control Board
Colorado River Basin Region
73-720 Fred Waring Drive, Ste 100
Palm Desert, CA 92260

Dear Mr. Angel,


This letter is in response to the Administrative Civil Liability Complaint No. R7-2007-0021 – an action against the Coachella Sanitary District. The City of Coachella agrees with the amount the Compliant imposes on the District of \$142,000 and does not contest the findings included in your correspondence of February 13th. After careful consideration, I am writing to inform you of the action plan the District created to satisfy our responsibility to the Water Quality Control Board.

The City intends to allocate funding to three areas:

- 1) An Overflow Drain Project for one of our City parks (Bagduma) – 2 Drywells and Vertical Drain systems were assembled to stop flood overflow. Total cost for the project will be \$73,918. An engineer's estimate is enclosed and represents one dry well cost to be \$48,800 and the remaining \$25,118 will be applied to the second dry well. A technical report is provided to share the history of the problem, description of the project and construction completion date of August 2007 with a park map.
- 2) State Cleanup and Abatement Account – a minimum contribution of \$63,500 will be made to the account on the City's behalf.
- 3) Sanitary staff training – Page 2 contains a table outlining trainings for the Sanitary District staff to expose them to various aspects of their field. This portion of our commitment requires \$4582.

Please feel free to contact me to discuss the action plan above or if you have any concerns. Thank you for your time.

Sincerely,


Jerry Santillan
City Manager

File: 7A 33 0104 012, Board Order R7-2005-0083

RECEIVED
APR 16 2007
REGION 7

Sanitary District Trainings			
<u>Name</u>	<u>Date</u>	<u>Location</u>	<u>Fee</u>
OSHA Standards for General Industry	Jun 11-14 or Aug 13-15, 2007	San Diego, CA	\$3,112.00
OSHA Introduction to Safety & Health Management	1 day - On Site	On Site	\$450.00
CWEA Annual Conference	(1 day) April 18, 2007	Ontario, CA	\$1,020.00
Total			\$4,582.00

** Detailed report of trainings available upon request. .*

DRAINAGE DRY WELLS AT BAGDUMA PARK COACHELLA, CALIFORNIA

HISTORY:

In the past the Bagduma Park has flooded due to rain. The area currently sheet flows out into the Douma street to 52nd to Harrison and down old 86 creating problem to flooding and insects. Also in the City's attempts to keep the water on the park it has been creating flooding of the park due to the clay for extended periods. Therefore also causing limited playing time for the citizens.

PROJECT

The Dry Wells as shown in the attached plan will be placed in two locations to intercept all of the park run off due to rain or watering. The Park is graded to drain to these locations. The dry wells are approximately 30 feet to 60 feet deep. The water will drain into a layer of sanding material between two clay layers that eventually is captured into CVWD agriculture drainage system.

The system will also keep the park dry and in good playing condition. Our citizens will definitely gain more playing time and a healthier environment.

SCHEDULE:

Construction is scheduled to start July and be completed by August of 2007.

BAG DUMA PARK DRY WELL FOR DRAINAGE ENGINEER'S ESTIMATE	
MOB AND DEMOB	\$ 2,000.00
DEMO CURB AND GUTTER AND REPL	
30 FT X \$130	\$ 3,600.00
SHORING	\$ 2,000.00
TRAFFIC CONTROL	\$ 1,000.00
DRILL WELL AND INSTALL PIPE	
60 FT X \$320	\$ 19,200.00
CONSTRUCT DRYWELL	\$ 10,000.00
BACKFILL AND COMPACT	\$ 8,000.00
PAVE STREET	\$ 3,000.00
TOTAL	\$48,800.00



REFURBISHMENT PLAN 2008 BAGDOUMA PARK

City of Coachella
APRIL 1, 2008

RECEIVED
APR 16 2007
REGION 7

- LEGEND**
- A BASEBALL FIELD REFURBISHMENT**
 - RENOVATE THREE (3) BASEBALL FIELDS AND ONE (1) FOOTBALL/SOCCER FIELD AND BENCHING FROM AND CONCERNION BUILDING
 - CHILDRENS PLAYGROUND
 - RENOVATE PLAYGROUND
 - WALKS, PLANTERS AND WATER FOUNTAIN AND UPGRADES TO COURTYARD AREA TO INCLUDE PICNIC AND DROP-OFF AREA
 - B BUILDING AREA EXTERIOR LANDSCAPE AND BASEBALL FIELD**
 - RENOVATE ONE (1) BASEBALL FIELD
 - CHILDRENS PLAYGROUND
 - WALKS, PLANTERS AND WATER FOUNTAIN AND UPGRADES TO COURTYARD AREA TO INCLUDE PICNIC AND DROP-OFF AREA
 - C SOCCER FIELDS 1 & 2 - REFURBISHMENT**
 - RENOVATE TWO (2) SOCCER FIELDS
 - TO BE UPGRADED A SANDBASE FIELDS
 - LANDSCAPE UPGRADES EAST OF THE SOCCER FIELD 2 TO INCLUDE TREES AND PICNIC TABLES
 - C1 SOCCER FIELD 3 - REFURBISHMENT**
 - RENOVATE ONE (1) SOCCER FIELD (TURF AND IRRIGATOR ONLY)
 - VOLLETTBALL COURT - SAND BASE
 - CONCRETE AND D.G. WALKING PATHES
 - SIGNIFICANT STANDCLUSTER OF PALM TREES TO BE PROTECTED, AND TREESHADDE STRUCTURES.
 - D PARK EXPANSION (6 ACRES)**
 - NEW PARKING LOT - 28 SPACES
 - CONCRETE AND D.G. WALKING PATHES
 - SIGNIFICANT STANDCLUSTER OF PALM TREES TO BE PROTECTED, AND TREESHADDE STRUCTURES.
 - E AVENUE 52 FRONTAGE**
 - DESERT STYLE LANDSCAPE PLANTINGS
 - CONCRETE AND D.G. WALKING PATHES
 - D.G. WALKING PATH LARKING AVENUE 52 AND AVENUE 51, AND
 - PARK IDENTITY SIGN.

Area Drywell 1

Drywell No. 2

ATTACHMENT "E"

STIPULATED TIME SCHEDULE
FOR THE IMPLEMENTATION OF SUPPLEMENTAL ENVIRONMENTAL PROJECT

Phase No.	Description of SEP	Completion Date	Due Date	Portion of ACL that May be Suspended
1	Install two dry wells in Bermuda Park to intercept park runoff	August 31, 2007	Final report due on or before October 31, 2007	\$78,500