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## 1. Personnel Report – *Eric Shay*

### New Hires

- Sabrina Rice, Scientific Aid, Non–Point Source Unit, South Lake Tahoe. This position compiles and organizes scientific data from water quality investigations and implementation and effectiveness monitoring reports; and assists technical staff in collecting data during field visits for various activities, including timber harvest, stream restoration, meadow restoration, and grazing projects.

### Promotions

- Kerri O’Keefe, promoted from Scientific Aid to Engineering Geologist, Cleanup/Site Investigation & Enforcement Unit, South Lake Tahoe. This position provides oversight on Underground Storage Tank sites and other sites in the Emergency, Abandoned, and Recalcitrant Fund as well as the Expedited Claim Account Program.

Vacancies – We are currently recruiting for the following positions:

- Office Technician, Victorville. This position supports our technical staff by finalizing staff correspondence and board agenda packets.
- Scientific Aid, North Basin Regulatory Unit, South Lake Tahoe. This position assists staff with administering storm water and water quality certification permitting actions, conducting inspections, reviewing reports, and maintaining databases.
- Scientific Aid, Land Disposal Unit, Victorville. This position assists staff with administering land disposal, storm water, and water quality certification permitting actions, conducting inspections, reviewing reports, and maintaining databases.

### Departures

- Robin Coale, Office Technician, Victorville. Ms. Coale has retired after 20 years of State service.
- Rebecca Phillips, Associate Governmental Program Analyst, Victorville. Ms. Phillips has retired after 29 years of State service.
- Mike Coony, Water Resource Control Engineer, Waste Water & Agricultural Operations Unit, Victorville. Mr. Coony has retired after 19 years of State service.

## 2. Environmental Justice Training – *Lisa Dernbach*

Through a grant from CalEPA, Environmental Justice (EJ) organizations in California conducted training for state and local agencies in Sacramento on November 30, 2018. The training was put on by Greenaction for Health and Environmental Justice, the Environmental Justice Coalition for Water, Comite Civico del Valle, and West Oakland Environmental Indicators Project. The training emphasized the importance of Environmental Justice and conducting appropriate outreach before approving projects or adopting orders and policies to avoid complaints and appeals filed by EJ groups.

Guest speakers included members from the state–recognized Wailiki Tribe (Mendocino County and Eel River) and Winnemen Wintu Tribe (Shasta Dam watershed) discussing issues affecting them, such as environmental effects from nearby landfills and getting tribal beneficial uses adopted.

A professor with San Francisco State University described studies pointing to poor communities and communities of color having more industrial land use as compared to communities populated with mostly Caucasian/wealthier members. People living and working in the poorer communities are exposed more often to cumulative hazards involving air pollution, truck traffic, noise, and poor water quality from illegal discharges. Chronic exposure to these stressors may lead to lower immune systems resulting in more incidences of asthma, cancer, and other diseases. People living in these communities have more health care costs and higher mortality rate as compared to the general population.

Several attorneys spoke about the need for EJ compliance with applicable statutes, regulations, and doctrines. The attorney for the Department of Fair Housing and Employment described state requirements prohibiting discrimination that could result in the loss of state funding for agencies, contractors, vendors, and grant recipients. Another attorney explained the requirements under Title VI of the Civil Rights Act and stated, for example, that not providing Spanish translation (or other appropriate languages) of documents and interpreter services at public meetings, workshops, and hearings violates the Civil Rights Act, when other than English speakers are stakeholders. A professor with Golden State University School of Law explained how public participation is a citizen's right and preventing language access is grounds for complaints and appeals. The same right applies to public access for disabled citizens at venues involving state business or decisions.

Most useful to attendees was a panel discussion on "EJ Do's and Don'ts for Regulatory Agencies." The Don'ts exceeded the Do's and included:

- Don't assume the public doesn't understand the issues,
- Don't talk more than you listen,
- Don't give the meaningless "sympathetic" regulator nod when others are speaking,
- Don't insult people about where they choose to live,
- Don't pretend to be friends with a community; just do your job,
- Don't send staff to meetings who are unable or not allowed to make decisions,
- Don't send only English-speaking staff to meetings where other language speakers are likely to be present,
- Don't assume everyone has a good internet connection, if at all,
- Don't always side with industry in the name of "progress,"
- Don't issue permits and enforcement orders and then not enforce them, and
- Don't tell people to not be emotional when they are confronting issues concerning their families' and community's health, safety, and welfare.

Some Do's are:

- Always tell the truth,
- Keep websites and webpages updated,
- Use multi-media to post announcements and videos, such as on Facebook, etc.,
- Include Tribes and disadvantage communities in notices and announcements,
- Do your homework, come prepared to meetings, and know the issues,
- Come to meetings with solutions and not just to explain rules and regulations,
- Assist communities in identifying resources for matters affecting them,
- If something is a violation of a permit or enforcement order, call it that,
- Follow through,
- Respond to complaints and letters in a timely manner, and
- If a matter is not under your authority or purview, provide contact information for the appropriate agency.

**3. South “Y” Regional PCE Contamination Update – Brian Grey**

Multiple efforts are being undertaken by Water Board staff (staff) and stakeholders to address the regional PCE contamination that has already impacted, and currently threatens, private and municipal supply wells down–gradient of the South “Y” area in South Lake Tahoe. The lateral extent of the regional PCE contamination is estimated to cover approximately 400 acres, extending from the South Y area in a north–northeasterly direction. Lukins Brothers Water Company, Tahoe Keys Water Company, and South Tahoe Public Utility District (water purveyors) all have wells that have been or currently are impacted by PCE contamination. Water purveyors continue to provide customers with safe drinking water; however, approximately 72 percent of South Lake Tahoe ‘s water supply is under threat from the regional PCE contamination (see Figure 1). Below is a summary of key activities and efforts being undertaken to address this serious situation.

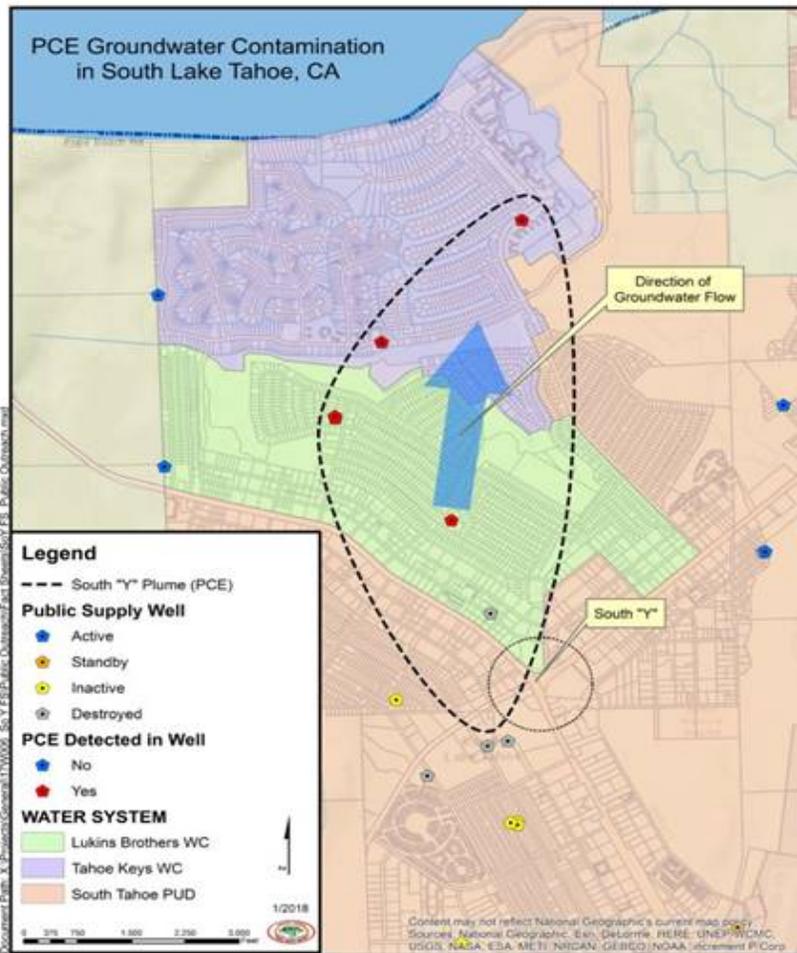


Figure 1

*Lake Tahoe Laundry Works Cleanup and Abatement Order*

Staff continues to work with the responsible parties associated with a former dry cleaner in the South Y Shopping Center to determine the lateral and vertical extent of contamination originating from the dry cleaner property and its potential contribution to the regional PCE contamination. Investigative activities are being completed to comply with a Cleanup and Abatement Order issued on May 12, 2017.

Since issuing the CAO, the responsible parties have completed their “Phase I” and “Phase II” investigation activities. These activities have consisted of collecting depth discrete groundwater samples from 12 locations across two transects (Lake Tahoe Boulevard and Tucker Avenue) and installing and sampling three multi-level offsite monitoring wells. Additionally, the responsible parties are currently implementing Preferential Pathway Evaluation tasks, which consist of collecting soil, soil gas, and groundwater samples from potential preferential transport pathways (e.g., sewer/utility corridors) at onsite and offsite locations. Historical groundwater flow is also being evaluated. Additional discrete depth sample locations will be selected following completion of the Preferential Pathway Evaluation and historical groundwater flow study. The responsible parties have been submitting weekly progress and planning reports and hosting weekly technical meetings with staff since October 2018.

Current data indicates that elevated PCE contamination is being reported down-gradient of the dry cleaner property. Additional actions will be necessary to identify the contaminant plume’s full geometry and determine if other PCE sources exist. The responsible parties have requested access to perform passive soil gas sampling on three offsite adjacent properties to evaluate potential sources. The schedule to conduct the additional investigative activities to fulfil CAO requirements, including evaluation of potential offsite sources, will be dependent on field conditions, weather, and obtaining access to the three properties. The responsible parties will be submitting their first technical report describing the investigation activities conducted and results obtained to date at the end of March 2019.

#### *Senate Bill (SB) 445 Funding Status*

Staff has received informal approval for SB 445 funding to conduct investigation in areas where the PCE contamination cannot be tied to a responsible party. Staff is anticipating a very active 2019 focusing on characterizing the regional PCE contamination through a combination of (1) records review and inventory development; (2) plume investigation and characterization activities involving soil, soil gas, and groundwater sampling, perimeter and sentry well network installation and monitoring, and vertical conduit evaluation and destruction; and (3) data management and communication. The funding will also be used for site-specific source identification tasks including (1) records review, and (2) collecting and analyzing soil, soil gas, and groundwater samples, to evaluate source areas and preferential pathways at multiple sites. Staff is hopeful that the regional characterization and site-specific source investigation tasks can be implemented beginning in spring of 2019.

#### *Staff Identification of Potential Sources*

Staff is currently conducting a preliminary source investigation that will help to prioritize and further refine SB 445 funded site-specific source investigation activities. Staff has been conducting a comprehensive and objective review of available case files, environmental record summaries, database resources, and historical information resources. From this review, staff has identified upwards of 150 properties and past/current businesses where PCE was likely stored, used, and/or disposed of in the South Y area. Staff will be soliciting additional information regarding past and/or current PCE handling, storage, and disposal practices for these properties and businesses. Additionally, staff’s records review has identified a limited number of potential responsible parties having a higher probability of contributing to the regional PCE contamination.

#### *Stakeholder and Public Outreach*

Staff has been meeting regularly with the three water purveyors affected by the regional PCE contamination to discuss ongoing and future efforts. Management level meetings are occurring on a monthly basis with other meetings occurring as needed to improve coordination between the water purveyors, Water Board, and State Water Board (i.e., Department of Financial Assistance). Staff is also a member of South Tahoe Public Utility District’s Groundwater Management Plan Strategic Advisory Group and a member of the technical advisory group

associated with Proposition 1 grant funding to conduct a feasibility study and engineering evaluation of potential remedial alternatives.

Staff has also participated in three public meetings held at the South Lake Tahoe City Council Chambers in February, August, and November 2018. The purpose of the public meetings has been to provide information to the public about the regional PCE contamination and what the various stakeholders are doing. The meetings were hosted by the water purveyors as part of their Proposition 1 grant funding requirements and will be continued by staff on a quarterly basis. Staff will be scheduling additional meetings with stakeholders through 2019 as the investigation proceeds.

**4. 2018 End of Construction Season Update for the Lake Tahoe Basin Management Unit Upper Truckee River Reach Five Restoration Project, El Dorado County – Laurie Scribe, Jim Carolan**

The United States Forest Service – Lake Tahoe Basin Management Unit (LTBMU) had planned to complete its Upper Truckee River Reach Five Restoration Project (Project) in 2016 but encountered several implementation problems and extreme weather events during the 2016 field season, resulting in Lahontan Water Board staff requiring plans for short-term and long-term corrective action. As described in a January 2017 EO article, the LTBMU submitted and implemented a short-term corrective action plan in November 2016 but was unable to complete the Project in conformance with the design plans. Water Board staff met with LTBMU staff in early January 2017, and again in March 2017, to provide explanation and clarification regarding the required content of the long-term Corrective Action Plan (CAP). The LTBMU submitted the long-term CAP on April 4, 2017; however, it was deemed incomplete by Water Board staff. Water Board and LTBMU management met on April 24, 2017, and again on May 15, 2017, to discuss the planning and implementation strategy for the long-term CAP. During these meetings, Water Board and LTBMU management agreed that due in part to the exceptionally wet year and uncertainty over meadow conditions, a multi-year, phased approach would be best to implement a long-term CAP.

In June 2017, the Water Board issued a Notice of Violation (NOV) to the LTBMU for failure to construct the Project as permitted, and failure to submit significant design changes to the Executive Officer for prior review and written approval as required by the 401 Water Quality Certification. The LTBMU has been actively working to fulfil the requirements of the NOV since that time.

In August 2017 the LTBMU submitted, and the Water Board accepted, two work plans for the Project: a 2017 Adaptive Management Plan for Project areas completed per the design plans, and a 2017 Emergency Stabilization Plan for areas that were not completed as previously approved. Implementation of the 2017 Adaptive Management Plan included repair of bank and floodplain erosion sites along the newly constructed channel, stabilizing the confluence area where the partially backfilled historic channel meets the newly constructed channel, and supplemental revegetation measures. The 2017 Emergency Stabilization Plan included constructing rock check dams and capping earthen plugs in the partially backfilled historic channel, stabilizing an eroded section of the temporary access road, and decommissioning portions of a sandbag berm that was constructed as part of the November 2016 short term corrective action plan.

In January 2018, LTBMU staff met with Water Board staff to present the engineered alternatives analysis presented in the *Draft Upper Truckee River Reach 5 Restoration Project, Hydraulic Modeling and Stability Assessment Report* prepared by the environmental consulting firm AECOM. The report also included an evaluation of the LTBMU's emergency stabilization efforts and adaptive management strategies for the partially backfilled historical channel, preferential flow paths between river channel meanders, and access roads. The report was finalized in March 2018 and the LTBMU incorporated the selected engineered alternative and recommended adaptive management strategies into the final long-term CAP.

In complying with the NOV, the LTBMU developed a written Project team engagement process, a planning and implementation schedule strategy, an engineered alternatives analysis, and interagency coordination and administrative procedures. These NOV responses are incorporated into the *Final Upper Truckee River Reach 5 Restoration Project Long-Term Corrective Action Plan* (final long-term CAP) submitted to the Water Board on July 31, 2018. Water Board staff accepted the final long-term CAP on September 12, 2018. Tasks associated with the long-term CAP included: (1) removal of berms associated with 2016 emergency measures (Photo 2); (2) stabilization of the streambank (Photo 3), floodplain, and the backfilled historic channel with cobble and willow stakes; (3) planting sod plugs along access roads and disturbed areas; and (4) installation of rock cobbled berms to prevent stream diversion in key areas (Photo 4).



Photo 1 – Upper Truckee River Project area with over-bank river flows in late May 2017. The partially backfilled historic channel can be seen on the left side of the meadow nearest the airport runway. The newly constructed channel, which has increased sinuosity, is visible in the middle of the meadow. The goal of the project is to reconnect the river with its floodplain, which is evident in this photo showing much of the meadow flooded.



Photo 2 – Sand bag berm removal and content stabilization conducted in September 2018, as part of the 2018 implementation and Monitoring Plan.



Photo 3 – Upper Truckee River bank stabilization materials placed in September 2018, as part of the 2018 Implementation and Monitoring Plan.



Photo 4 – Rock cobble rolling berm constructed along a Project access road in October 2018, as part of the 2018 Implementation and Monitoring Plan.

Water Board staff worked closely with the LTBMU during 2018 to ensure continued conformance with the requirements of the NOV and successful completion of the Project. Site inspections in 2018 documented improved vegetative recovery in many temporary disturbance areas and stability of work implemented in 2017. LTBMU staff will conduct site inspections on a periodic basis and after storm and flood events. Any water quality related issues will be reported to Water Board staff and mitigated using the LTBMU's adaptive management strategies detailed in the final long-term CAP.

### Lessons Learned

This multi-year restoration project to the largest tributary to Lake Tahoe has involved extensive interaction between Water Board and LTBMU staff. Water Board staff have learned that restoration projects undertaken by the USFS require significant coordination between the two agencies' staff in the planning, permit application, project implementation, and reporting. An additional lesson that staff has learned is winterize sites earlier to avoid implementation schedule overruns and potential extreme weather conditions at the end of the construction season, the Water Board Executive Officer is now including a condition in each 401 Water Quality Certification requiring project implementers to verify that all in-stream work is completed by October 1 of each construction season.

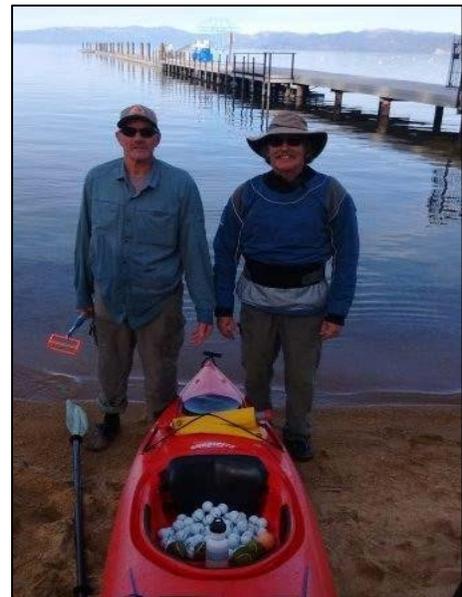
#### 5. The Great Kiva Beach Golf Ball Cleanup of 2018 – Anne Holden, Robert Larsen

Paddling near the shoreline of South Lake Tahoe's Kiva Beach, retired Water Board staff geologist Bud Amorfini was enjoying a day on his standup paddleboard in early November. The weather was warm, and few boats were out to disturb the calm waters. Looking down at the sandy lake bottom, he noticed... golf balls? Dozens of golf balls were scattered a few hundred yards offshore in ten to fifteen feet of water! Apparently, someone had thought it would be a great idea to use Lake Tahoe as a driving range. Making note of the location, Mr. Amorfini cut short his paddle day and headed home to email his Water Board colleagues, hoping to enlist their help to get this unsightly discharge of golf balls cleaned up.



Dave Holden on the hunt for golf balls.

After consulting with Water Board staff Robert Larsen and Anne Holden, and contacting several other Lake Tahoe Basin agencies, Bud soon realized that the best approach was “do-it-yourself.” The Tahoe Regional Planning Agency had put their boat in dry-dock for the season, and no other agency contacted had the means to conduct a golf ball cleanup mission. Bud purchased a golf ball retrieval device and called two people he knew who would take on the “Great Golf Ball Cleanup of 2018”: former Water Board scientist Robert Erlich and Dave Holden, husband of Water Board staff Anne Holden. They assembled the gear: a golf ball retriever, two standup paddleboards, a kayak, and can-do attitudes. The mission was to get the golf balls out of the lake before winter storms scattered them beyond surface retrieval depth.



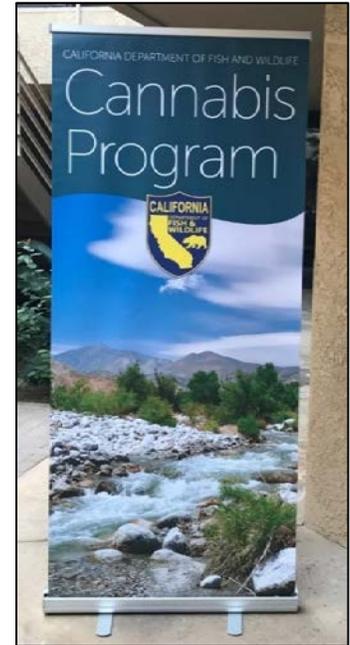
Bud Amorfini and Robert Erlich with the haul of golf balls.

Mr. Amorfini, Mr. Erlich, and Mr. Holden collected 84 golf balls and six tennis balls from the waters off Kiva Beach. And no one went swimming!

Their efforts to remove trash from the lake are appreciated by Water Board staff. While volunteer efforts such as this are commendable, they highlight the fact that there is no programmatic agency approach to cleaning up discarded materials in the lake. Water Board staff and the Nearshore Agency Working Group partners are evaluating opportunities to fund targeted cleanup of impacted nearshore areas.

## 6. Cannabis Regulatory Program Outreach Workshops – Kathleen Bindl

Water Board staff conducted three outreach events on December 4-6, 2018. Events were held in Palm Desert, Adelanto, and Needles. These cities were chosen due to the high concentration of cannabis cultivation in these areas. Water Board staff Emily Cushman (Engineering Geologist) and Kathleen Bindl (Environmental Scientist) with the Eastern California Regional Cannabis Unit organized the events. Notification of the events was extensive and encompassed all local planning and code enforcement departments, tribal contacts, wastewater treatment plant staff, and known cannabis cultivators. Events were conducted in conjunction with State Water Board staff (Division of Water Quality and Office of Enforcement), California Department of Food and Agriculture’s CalCannabis Licensing Division, and California Department of Fish and Wildlife. Attendance ranged between 50–60 people per event.



The goals of our events were to educate and provide information regarding our regulatory program and the requirements with state and local agency staff, and cultivators. Presentations were given by each state agency and consisted of an overview of their respective programs and requirements. Afterwards an open house event was held where interested parties could speak directly with agency representatives. The entire Eastern California Regional Cannabis Unit team were present with laptops to enroll cultivators into the Water Board’s Cannabis Permit. Informational handouts were provided by all agencies. Local staff were very welcoming and appreciative of our efforts to connect in-person and provide useful information. Given the extensive group of entities involved in the cannabis industry, it was very beneficial to have all three regulating agencies together. Feedback was very positive from attendees. As a part of our enrollment and compliance assistance efforts, we hope to host more educational events like this in the future.



Palm Desert Outreach Event – Water Board Presentation



Palm Desert Outreach Event



Adelanto Outreach Event – CalCannabis Presentation



Needles Outreach Event – CA Dept. of Fish & Wildlife presentation

## **7. Eastern California Regional Cannabis Unit Activity from October 15, 2018 to December 14, 2018 – Eric J. Taxer**

### Enrollment

The Eastern California Cannabis Unit staff issued 25 Notices of Applicability (NOAs) for indoor cannabis cultivation facilities and an additional three NOAs for outdoor cannabis cultivation facilities located within the Lahontan region (total of 28 NOAs).

To date, the Eastern California Cannabis Unit staff have issued a total of 61 NOAs in Region 6. An additional 11 applications are currently being processed, and an additional 27 applications have been submitted but have not yet remitted the applicable application fee.

### Wastewater Permitting

Many indoor cannabis cultivators wish to dispose of their cannabis cultivation wastewater (classified as industrial waste) to onsite wastewater disposal systems (such as septic tanks) comingled with the domestic wastewater from their facilities. Staff are drafting a general permit for the Lahontan Region to begin addressing this demand. Staff have initiated and completed AB52 Tribal Consultation for this action and have completed CEQA scoping.

### CEQA

A preliminary step for many cultivators seeking a local, county, or city cultivation permit is to obtain environmental review led by the local jurisdiction under CEQA. As a responsible agency, Eastern California Cannabis Unit staff submitted comments on six CEQA documents for proposed projects Adelanto.

Additionally, Water Board staff have been coordinating with the City of Adelanto and the City of California City to refine their CEQA process and to begin addressing cumulative environmental impacts from the high number of cannabis facilities in each area.

### Outreach:

Eastern California Cannabis Unit staff continued to conduct extensive outreach efforts. Staff provided application assistance to cultivators. Assistance included:

- Explaining the application process and alternative waste discharge options to new cultivators. Cultivators who had already submitted applications for NOA processing also received similar assistance.

- Coordinating compliance assistance to Inyo County for landfill operations and interpreting permitting restrictions for accepting cannabis irrigation wastewater at the landfill from indoor cultivation facilities.
- Conducting outreach enrollment events.

#### Other/Miscellaneous

Staff have continued to coordinate with local agencies in the development of their cultivation ordinances. Nevada County, Riverside County, the City of South Lake Tahoe, and the City of Barstow are in varying stages of developing ordinances that would allow for cultivation.

Eastern California Cannabis Unit staff continue to work with the Lahontan Water Board's Regional Data Coordinator and the State Water Board's Office of Information Management to obtain a student intern (housed within the Lahontan Water Board) to develop a data visualization tool, which will highlight existing water quality data. The position has been approved, and hiring documents are currently being prepared. The Eastern California Cannabis Unit will be piloting the data visualization tool.

### **8. Fall 2018 Soil Disturbance Prohibition Variances – Dale Payne**

The Water Board grants variances to the soil disturbance prohibition for activities occurring between October 15 and May 1 in the Lake Tahoe Basin provided adequate controls are in place to protect water quality, including preparing for extreme weather events. The soil disturbance prohibition is in the Lake Tahoe Basin construction permit and is in other Water Board orders for projects outside of the Lake Tahoe Basin. The following projects received soil disturbance prohibition variances:

#### Storm Water Improvement Projects

- Wildwood Commons Development, first variance issued for October 16–29, 2018; second variance issued for October 30–November 6, 2018; third variance issued for November 8–14, 2018.

#### Infrastructure/Maintenance Projects

- Alpine Meadows Water Line, variance issued for October 16–30, 2018.
- CalTrans Highway 89 Culvert Replacement, first variance issued for October 15–29; second variance issued for October 30–November 16, 2018.
- CalTrans Bay View Wall Emergency, variance issued for October 30–November 16, 2018.
- CalTrans Y to Trout Creek Project, variance issued from October 16–27, 2018.
- CalTrans Sheep Ranch Shoulders, variance issued for October 30–November 9, 2018.
- CalTrans Little Walker Little Wall, variance issued for October 26–November 29, 2018.
- Mountain Meadow Drainage Channel, variance issued for October 25–November 5, 2018.
- Bijou Marketplace, first variance issued for October 16–29; second variance issued for October 30–November 5, 2018.
- Lake Tahoe Community College Mobility Hub, first variance issued for October 17–26; second variance issued for October 27–November 10; third variance issued for November 11–24, 2018.

- Coldstream Specific Plan, first variance issued for October 16–29 second variance issued for October 30–November 12; third variance issued for November 13–16, 2018.
- Squaw Valley Resort Mountain Run Culvert, variance issued for November 2–9, 2018.
- Squaw Snow Storage, first variance issued for October 16–October 26; second variance issued for October 27–November 2, 2018.

All projects have been inspected, all disturbed areas have been stabilized, and work areas winterized. Additional variances may be granted for emergency work between now and May 1, 2019.

## **9. Bridgeport Public Utility District’s Arsenic Treatment and Disposal Alternatives – Trevor Miller**

Bridgeport Public Utility District (District) has been consulting with an engineering firm to resolve the high concentrations of arsenic in the groundwater used for domestic potable water supply. Initially a regenerative resin treatment facility with no wastewater discharge was designed, but pilot–scale testing proved this technology uneconomical. Coagulation/precipitation and filtration technology was chosen as the preferred alternative; in general, this technology has greater arsenic removal capabilities with ferric–chloride as the proposed coagulant. The proposed coagulation process produces an iron–arsenate precipitate to be collected on a sand–media filter. Biweekly, the sand–media filter would be backwashed to clean off the iron–arsenate precipitate.

The original proposal was for the backwash water with the arsenic laden precipitate to be discharged into the sanitary sewer terminating at the local wastewater facility in Bridgeport (also owned/operated by the District). Water Board staff opposed this idea citing concerns over arsenic precipitate stability, overall arsenic loading to the facility, leachate toxicity, and the possibility the waste could be characterized as a California hazardous waste. Staff met with the District’s consultant to discuss the project design and express the mentioned concerns. The consultant is considering proposing the mixture of the backwash and precipitate be separated by some undetermined dewatering process, generating a precipitate with a reduced liquid content and a centrate (centrate is the liquid phase separated from the backwash and precipitate during the dewatering process). The precipitate would be disposed of appropriately offsite after dewatering. The centrate would be disposed to the local wastewater facility. This process should drastically reduce the loading of arsenic to the wastewater facility and alleviates the concerns over creating a hazardous waste site.

Upon receipt of the District’s final proposal addressing the arsenic disposal concerns, Water Board staff will begin reviewing the proposal for acceptance, which may necessitate amending the District’s Waste Discharge Requirements.

## **10. Standing Item – Leviathan Mine, Alpine County – Chris Stetler**

Water Board staff continues coordinating with United States Environmental Protection Agency (USEPA) and Atlantic Richfield Company (AR) for the completion of current and proposed site work at Leviathan Mine,

### **2018 Summer Pond Water Treatment Plant Operations**

On an annual basis since 1999, the Water Board conducts summer treatment of the fluids stored in the evaporation ponds. This treatment effort typically commences in early–July and finishes in mid–September. The purpose of the summertime treatment effort is to create capacity to contain the AMD and direct precipitation that enters the pond system from approximately October 1 through June 1. The Water Board’s summer treatment program creates storage capacity in the ponds by removing fluids from the ponds, treating those fluids to meet USEPA discharge criteria,

and then discharging the treated fluids to Leviathan Creek. The Water Board's Pond Water Treatment (PWT) system is a lime treatment facility located adjacent to Pond 1. The PWT system draws fluids from the adjacent pond, mixes lime with the pond fluids, separates the solids that precipitate out of the mixture, and then decants the treated fluid to Leviathan Creek.

The Water Board's PWT contractor, AECOM, began PWT operations in mid-July 2018. PWT operations continued through August 31, 2018. AECOM operated the PWT system 24 hours per day, 7 days per week. The PWT system was shut down for the year on August 31, 2018 after treating and discharging approximately 9.2 million gallons.



Ponds 2N and 2S (left) and Pit Clarifier (right), Aug. 2018

The Water Board's 2018 PWT effort, combined with natural evaporation, resulted in nearly restoring the upper pond system's approximately 14-million-gallon storage capacity. Typically, PWT system operations continue until the upper pond system is essentially empty; however, in 2018, Water Board staff estimated that approximately 700,000 gallons of AMD remained in the upper pond system at the end of the treatment effort in late-August. The volume of AMD remaining in the upper pond system at shut down was due to insufficient funds remaining in the Water Board's three-year contract with AECOM. Although this was a three-year contract intended to last through the 2019 treatment season, funds spent in 2017 (record treatment year) and 2018 exhausted nearly all the funds allotted for this contract. Water Board is now working with Department of General Services to secure another two-year contract, with an option for a third year, for years 2019, 2020, and 2021.

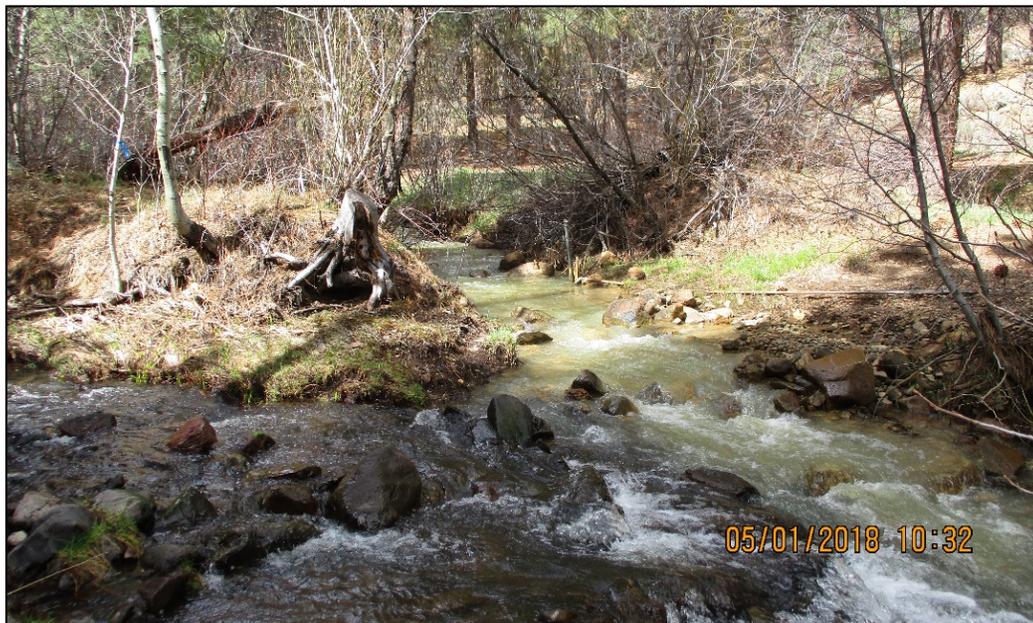
### **Remedial Investigation and Feasibility Study**

**Site Characterization Report:** Under order from USEPA, AR submitted a Site Characterization Report (SCR) for the Leviathan Mine Site on December 31, 2017. The SCR summarizes the site characterization components of the Remedial Investigation (RI) performed at Leviathan Mine, which consists of 12 different media- or study area-specific investigations (e.g., surface water, groundwater, mine waste, fish tissue, stream sediment, floodplain soil). The scope and results of these investigations are described in detail in Technical Data Summary Reports that are provided as appendices to the SCR. The SCR represents the first comprehensive presentation and analysis of data AR and others have been collecting for multiple media during the past ten years.

Water Board staff reviewed the SCR and provided comments to the USEPA by letter dated August 7, 2018. In the letter, Water Board staff explained several concerns regarding the SCR that would need to be resolved before the Water Board could concur with many of the results and conclusions provided in the SCR. The issues raised in the Water Board's August 7, 2018 letter remain mostly unresolved and USEPA has yet to provide a plan to address the remaining open issues. In the meantime, USEPA has postponed the delivery dates set forth by USEPA in 2017 for a draft Remedial Investigation Report, draft Feasibility Study Report, and a final Remedial Investigation/Feasibility Study Report. USEPA has yet to re-establish delivery dates for these documents.

**Proposed Early Final Remedial Action (EFRA):** Water Board staff has been in communication with USEPA and AR regarding the possibility of implementing an Early Final Remedial Action (EFRA) at Leviathan Mine. The proposed EFRA would encompass year-round capture and treatment of AMD at Leviathan Mine for purposes of reducing metals loading to Leviathan Creek. The discussions regarding the EFRA are just beginning, but AR has already presented an aggressive conceptual implementation schedule leading to the design and construction of an EFRA for year-round capture and treatment of AMD. Under the Settlement Agreement between the Water Board and AR, the Water Board could be responsible for the design and construction of the EFRA. Water Board staff will continue to work with USEPA and AR in this process to ensure that the process is compliant with CERCLA, including requirements regarding Applicable, Appropriate, and Relevant Requirements (ARARs) of the State of California.

**Settlement Agreement Activities:** Water Board staff has continued its efforts to review quarterly cost reports submitted by AR for Remedial Investigation and Feasibility Study (RI/FS) activities they have conducted. Since July 1, 2018, Water Board staff has reviewed AR's cost reports and supplemental information for the third and fourth quarters of 2017, and the first and second quarters of 2018. Issues remain with AR's second quarter 2018 cost report. Staff's review of ARC's RI/FS costs will continue for the next several years and is a critical element of a complex cost-sharing and accounting system established by the Settlement Agreement between the Water Board and AR. The Settlement Agreement provides that for every dollar AR spends for RI/FS work over \$11 million dollars, AR is to receive a 40-cent credit from the Water Board towards the amount AR will have to pay for construction of the final Remedial Action for Leviathan Mine. Through the first quarter of 2017, Water Board staff and ARC have come to agreement that ARC has spent nearly \$45.3 million in RI/FS costs, putting AR's credit towards construction of the Remedial Action at approximately \$13.7 million.



Confluence of Mountaineer Creek (left) and Leviathan Mine Creek (right), May 2018

## **Publication by Sierra Nevada Aquatic Research Laboratory**

In 1995, the Water Board entered into its first contract with Sierra Nevada Aquatic Research Laboratory (SNARL) to evaluate the impacts of AMD upon the macroinvertebrate community in various surface waters in the Bryant Creek watershed, including Leviathan Creek. The intent of this work was to establish biological criteria for monitoring stream health and to establish a benchmark for evaluating ecological conditions and the progress and success of mine cleanup efforts. The work set in motion by that first contract with SNARL has carried on under subsequent contracts with the Water Board, the United States Forest Service, USEPA, and other parties. The most recent publication of SNARL's work related to the macroinvertebrate studies near Leviathan Mine appears in the *Journal of Environmental Toxicology and Chemistry* (Volume 37, Number 10) under the title, "Long-Term Effects and Recovery of Streams from Acid Mine Drainage and Evaluation of Toxic Metal Threshold Ranges for Macroinvertebrate Community Reassembly." A primary contributor to the publication is Dr. David Herbst, a UC Santa Barbara freshwater aquatic scientist. Dr. Herbst has been working on this project since 1995, and Water Board staff are very appreciative for Dr. Herbst's dedication and commitment to this project. The publication presents an encouraging story that shows the success of lasting efforts to capture and treat AMD and improve stream water quality and ecological health, but at the same time is cautionary in that there is still work to be done to complete the restoration. SNARL's work shows that efforts to clean the water and restore life have been successful for surface waters further downstream, whereas surface waters closer to the mine, while improved, remain in a damaged state, primarily due to the seasonal release of untreated AMD that occurs when AR's AMD treatment system is shut down (typically from mid-October through mid-May).

### **11. Advancing the Lahontan Region's Triennial Review Priorities – *Ed Hancock***

The effects of climate change loom large on the horizon as the Water Board is preparing in coordination with other agencies and stakeholders to adapt to mitigate the inevitable changes predicted to occur as the climate warms. Eastern portions of California have already begun to experience declining rates of precipitation, and communities in these areas will have to learn how to live with extended periods of drought, increases in extreme weather events, and a diminished snowpack in the Eastern Sierra. It is imperative that the Region prepare now for these issues which will have both environmental and anthropogenic impacts, such as reduced in-stream flows effecting aquatic habitats and reductions of water available for agricultural and municipal uses.

With a view to planning for and mitigating these issues, the Water Board's Planning and Assessment Unit (PAU) has begun to engage with the State Water Board regarding in-stream flow regulation by joining the newly minted in-stream flow workgroup in coordination with the California Water Quality Monitoring Council (CWQMC). The goals of the workgroup are to craft regulations to ensure the protection of the Region's aquatic life beneficial uses by keeping stream water in the stream channel, an aspect of regulation which will be of the utmost importance as pressures of climate change affect the predictability of instream flow and also may intensify demands upon the Region's waters, including exportation.

Critical to regulating instream flows will be engagement with the many diverse stakeholder groups in the Region, all of whom have competing priorities for the use of water. Over the last year, the PAU began to engage with two Tribal Governments in the Lahontan Region to implement projects to improve both the quality of the Lahontan Regions' waters and modernize the Basin Plan. The Bishop Paiute Tribe has been and will continue to be a critical partner for the Bishop Vision Project, and the San Manuel Band of Mission Indians has been an important partner for Basin Plan updates related to the Mojave River. The PAU recognizes that the recent adoption of Tribal beneficial uses by the State Water Board in 2017 provides the Lahontan Region with tools to recognize the important and historic uses of water by our Tribal partners, and staff will work to adopt these beneficial uses into the Lahontan Basin Plan in the coming years.

## 12. Standing Item – Lake Tahoe Nearshore Program Status – *Robert Larsen*

Lake Tahoe's nearshore remains an active and complex research and monitoring topic. As the Water Board continues to fund long-term data collection, the agency and its partners are developing contracts with academic partners to better understand the drivers of attached algae (periphyton) growth to evaluate what (if any) management actions can be taken in response to perceived elevated periphyton conditions. Other important assessment work was completed summer 2018, offering insight into bacteria levels at popular beaches and exploring the extent of native and invasive plant growth in nearshore areas.

The developing contracts, funded by Senate Bill 630 resources, are anticipated to support three projects to start in summer 2019: (1) the United States Geological Survey (USGS) will use isotopic analysis to better understand the source of nutrients delivered to the nearshore via groundwater; (2) University of California, Davis researchers will investigate the impact of warming lake waters on nutrient and carbon cycling to evaluate climate change impacts on algal growth; and (3) University of Nevada, Reno researchers plan to explore the impact of introducing crayfish on algal grazing conditions. Collectively, these studies will further our understanding of periphyton growth at Lake Tahoe to inform management direction.

In summer 2018, the Tahoe Regional Planning Agency (TRPA), in partnership with the Nevada Tahoe Conservation District, completed a comprehensive human health survey to assess bacteria and cyanotoxin levels at popular public access sites. No toxins or harmful algal blooms were detected during five independent sampling events at more than 20 locations. While there were a small number of isolated bacteria hits, the bulk of the sampling confirmed that Tahoe's beaches and other access points are free from harmful bacteria. The Nearshore Agency Working Group will work together to determine an appropriate interval to repeat the study in future years. TRPA's selected plant survey contractor, Marine Taxonomic Services, completed field work this summer to document the location and extent of aquatic plants. Using aerial surveys, LIDAR technology, and satellite imagery coupled with diver-assisted transect measurements, the team has compiled detailed maps that provide invaluable guidance in aquatic invasive species control work.

As noted at the Board's September 2018 meeting, these efforts are guided by the Water Board's Updated Nearshore Water Quality Protection Plan (Plan). Water Board staff have extended the public comment period deadline on the updated Plan to January 31, 2019. No public comments on the Plan have been received through December 2018. Water Board staff is tentatively planning to bring the Nearshore Plan to the Water Board for final acceptance at the March 2019 Water Board meeting in South Lake Tahoe.

**13. Victorville Staff Attend SMARA Surface Mine Inspection Workshop – Shelby Barker**

On October 23–24, 2018, Christina Guerra and Shelby Barker of the Lahontan Victorville office attended the Surface Mining and Reclamation Act (SMARA) Surface Mine Inspection Workshop (Workshop) in Hesperia, California. The two-day Workshop was offered by the California Department of Conservation, Division of Mine Reclamation (DMR), and in collaboration with the County of San Bernardino. SMARA lead agencies are required to conduct annual inspections of surface mines. This Workshop is part of a newly established training program through DMR that certifies surface mine inspectors to perform inspections in compliance with SMARA requirements. While Water Board staff do not inspect surface mines for SMARA, we do perform inspections in compliance with our waste discharge requirements (WDRs) and the California Code of Regulations, title 27 (Title 27). WDRs and Title 27 may, and often do, contain requirements that can coincide or conflict with SMARA such as revegetation of waste units during closure. As such, Water Board and DMR staff must work together to find acceptable solutions.

The first day of the Workshop was conducted in a classroom, and the second day was in the field for hands-on training. Topics discussed included SMARA requirements, expectations of SMARA inspections, vegetation expectations, and financial assurances. In the field, DMR staff shared with us evaluation methods and tools to evaluate slopes and revegetation requirements.

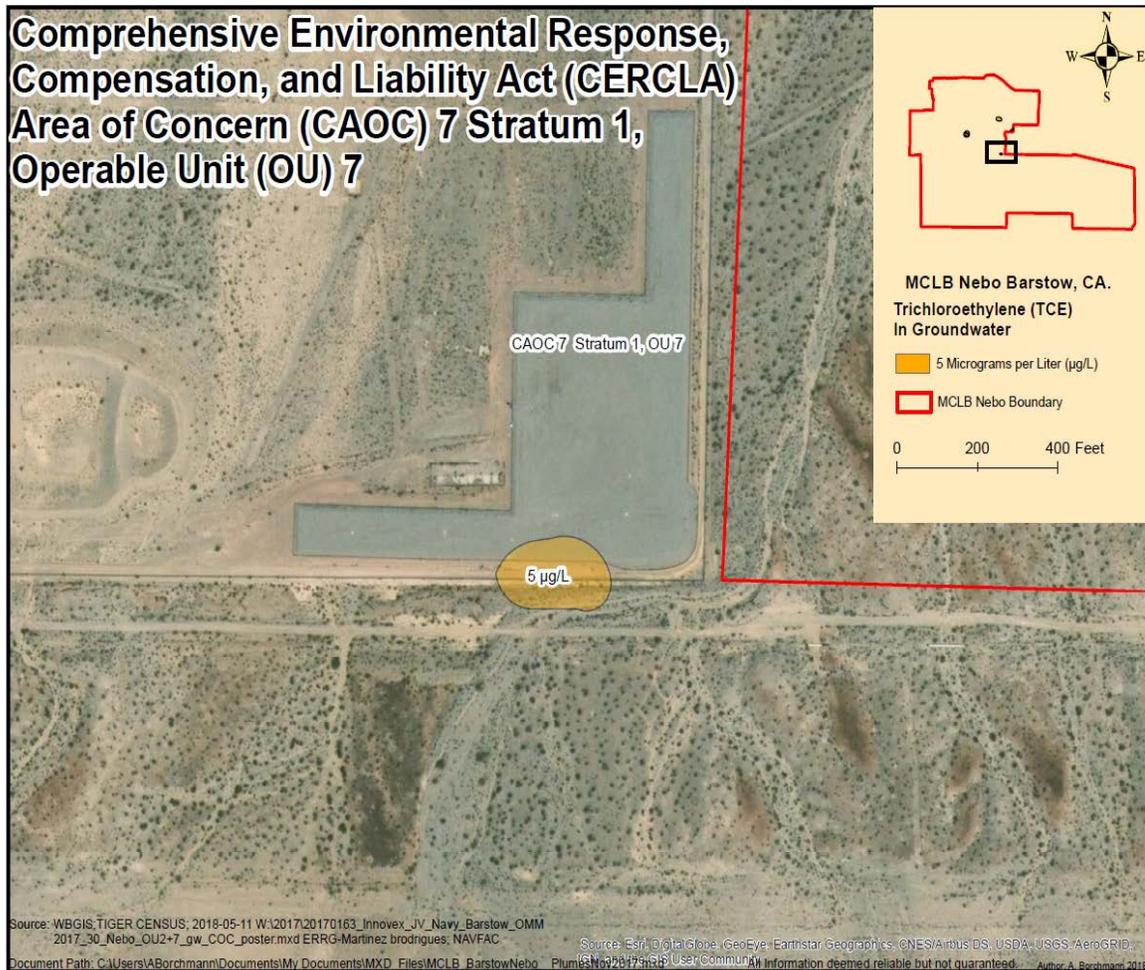
At the Workshop, Water Board staff and other county and state personnel shared the importance of staying in communication with one another during project inspections. Inspection of the Mountain Pass Mine was given as an example of how Water Board staff and San Bernardino County staff (SMARA lead agency) routinely conduct joint field inspections. Following the Workshop, DMR personnel requested information on the Mountain Pass Mine WDRs and Title 27 requirements to help facilitate their responses to the recent SMARA revegetation plan received for the mine. DMR staff also suggested similar future coordination with Water Board staff for Briggs Mine. Water Board staff look forward to continuing our cooperative work with other state and local agencies to improve our inspections while protecting water quality.

**14. Remedial Action for Soil Vapor and Monitored Natural Attenuation at Operable Unit 7 (OU 7), Marine Corps Logistics Base (MCLB) Barstow – Christopher Avalos**

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Area of Concern (CAOC) 7 Stratum 1, Operable Unit (OU) 7 is a former waste disposal and drum storage area (Site) in the southern portion of Nebo Main Base at MCLB Barstow. The waste disposal area was operated from the early 1950s until 1964. The Site consists of an approximately 9-acre, L-shaped capped landfill with each “leg” measuring approximately 50 by 750 feet. Buried wastes are estimated to be 15 to 20 feet below the armored cap surface (see Map 1). On December 12, 2014, a Record of Decision (ROD) was signed that outlined remedies for OU 7, including CAOC 7 Stratum 1. The ROD identified trichloroethene (TCE) as a contaminant of concern (COC) in groundwater and TCE and tetrachloroethene (PCE) as COCs in soil vapor. In the OU 7 ROD, soil vapor extraction (SVE) was selected as the remedy for soil vapor and monitored natural attenuation (MNA) was selected as the remedy for groundwater. The remedial action objective for the selected remedy for soil vapor is the protection of groundwater at the site.

Two SVE pilot tests were conducted in late 2015/early 2016 to support the full-scale implementation and design of an SVE system. During the pilot tests, two quadruple-nested vent wells were installed, along with a mobile SVE system. Sampling results indicated that volatile organic compounds (VOCs) were distributed vertically through the vadose zone. The pilot test concluded that SVE would be an effective remedy to reduce total VOC soil concentrations at the Site.

In October 2018, the Navy finalized (with regulatory input) a remedial action work plan for CAOC 7 Stratum 1 to implement the full-scale remedial action at the Site. Field mobilization commenced soon thereafter and is currently on-going. Various field activities are planned during 2018/2019. Following construction of the SVE system, operation and monitoring of the SVE system is scheduled for a one-year period. Additional operations will be evaluated at the end of the first year.



Map 1 – Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Area of Concern (CAOC) 7 Stratum 1, Operable Unit (OU) 7

### 15. Base Wide Per- and Polyfluoroalkyl Substances (PFAS) Site Inspections and Sampling of Soil and Groundwater at Marine Corps Logistics Base (MCLB) Barstow – Christopher Avalos

In 2016, the United States Environmental Protection Agency (USEPA) established drinking water health advisories for two per- and polyfluoroalkyl substances (PFAS), which are commonly used for fire-fighting and retardation. The USEPA set a lifetime health advisory level of 70 parts per trillion (ppt) for perfluoro octane sulfonate and perfluorooctanoic acids as a combined total concentration. Health advisories provide information on contaminants that can cause human health effects and are known or anticipated to occur in drinking water. USEPA's health advisories are non-enforceable and non-regulatory and provide technical information to states agencies and other public health officials on health effects, analytical methodologies, and treatment technologies associated with drinking water contamination. No current health advisory or maximum contaminant level has been established for any other PFAS.

Site inspections for PFAS areas were conducted and groundwater samples were collected and analyzed for PFAS from monitoring wells at both the Nebo Main Base and Yermo Annex at MCLB Barstow in 2016. At the Yermo Annex, PFAS were not detected in groundwater samples at levels above the advisory level. At the Nebo Main Base, PFAS were detected in eight of sixteen monitoring wells sampled, four of which exceeded the lifetime health advisory level of 70 ppt. As the Navy was aware that two residences are located downgradient of the Nebo Main Base and could potentially be at risk for PFAS, the Navy collected groundwater samples from these off-base residential wells. Laboratory results showed that one residential well had concentrations of PFAS above health advisory levels. The Navy immediately provided this residence with bottled water. However, the property was vacated shortly after bottled water was provided, and water delivery has since been halted. The Navy periodically visits the property to ensure that the property continues to be vacant.

## **16. Standing Item – Quarterly Violations Report – 3rd Quarter 2018 – Jeff Brooks**

The Quarterly Violations Report for July 1, 2018 to September 30, 2018 includes brief summaries of (1) violations, (2) violation response rate trend, and (3) enforcement action status table.

### **Synopsis of 3rd Quarter 2018 Violations**

Sixty-three (63) violations were recorded for the period (Attachment A). The violations were distributed across a wide variety of facilities. The most common violations recorded were stormwater violations (13) at sites enrolled under the National Pollutant Discharge Elimination System (NPDES) General Permits for Storm Water Discharges associated with Construction Activities, similar to last quarter.

There were also twelve (12) late reporting violations. Such violations cover both a failure to submit reports and submitting reports past due dates. The Cleanup/Site Investigation and Enforcement Unit will soon be fully staffed allowing it to address those violations where dischargers have failed to submit reports. This is one of the Unit's high-priority initiatives, given that the Water Board relies heavily upon dischargers submitting monitoring reports and technical reports to evaluate compliance with water quality regulations and to assess if water quality is being adequately protected and/or restored.

### **Violation Response Rate Trend**

As part of staff's continuing efforts to evaluate operations and identify opportunities to improve its effectiveness, staff reviewed its response rate to violations over the past five years. Staff's analysis showed an improving response rate from 2014 to 2016, going from responding to approximately 35 percent of total violations to a rate of approximately 67 percent. This improving trend is likely attributed, in part, to the focused attention towards improving the Water Board's Enforcement Program. However, from late 2016 to present, the Region's violation response rate has decreased to approximately 42 percent. This decreasing trend is due to the significant staff turnover the Region has experienced for the past two years. Fortunately, the staff turnover rate has slowed in recent months and we are nearly fully staffed. Additionally, Enforcement Program training was provided this past fall to our new staff and experienced staff members, clearly outlining roles and responsibilities regarding responses to violations. Templates and examples for informal and some formal enforcement actions have also been created and made available to staff. We are expecting to see an increasing trend in the Region's response rate to violations over the next several months in response to more stable staffing and recent training.

### **Table of Pending Formal Enforcement Cases**

Please see Attachment B.

Attachments: A – 3rd Quarter 2018 Quarterly Violations Table  
B – Pending Formal Enforcement Cases – 3<sup>rd</sup> Quarter 2018

Attachment A  
Violations Report - 3rd Quarter 2018  
July 1, 2018 to October 31, 2018

Violation Class	Responsible Party	Place (Facility)	Violation Type	Date Occurred	Violation Description	Corrective Action	Enforcement Action (EA)	EA Effective Date
<b>El Dorado County</b>								
2	Caltrans District 3	3C3804 Y to Trout Creek	Storm Water - Deficient BMP Implementation	7/19/2018	Deficient BMP implementation in violation of B.O. R6T-2016-0010 Section VIII.		Staff Enforcement Letter	7/20/2018
2	Drum Lodge LLC	CHINKAPIN PROJECT	Storm Water - Deficient BMP Implementation	9/7/2018	Deficient BMP implementation in violation of B.O. R6T-2016-0010 Section VIII.		Staff Enforcement Letter	9/14/2018
2	Federal Highway Administration CFLHD	Meeks Bay Bike Path	Storm Water - Deficient BMP Implementation	7/25/2018	Deficient BMP implementation in violation of B.O. R6T-2016-0010 Section VIII. See attached report for details.		Staff Enforcement Letter	7/27/2018
2	BIJOU MARKETPLACE LLC	South Lake Tahoe Commercial	Storm Water - Deficient BMP Implementation	7/24/2018	Deficient BMP implementation in violation of B.O. R6T-2016-0010 Section VIII.		Staff Enforcement Letter	7/27/2018
<b>Inyo County</b>								
B	CR Briggs Corporation	Briggs Mine Project	Deficient Monitoring	7/15/2018	Failed to conduct the second quarter monitoring. Violates Board Order 6-01-033, WDR section III.C and MRP section IX.B.	Discharger has not proposed or identified corrective actions.	Notice of Violation	11/26/2018
B	CR Briggs Corporation	Briggs Mine Project	Reporting -> Late Report	7/15/2018	Failed to submit the second quarter 2018 monitoring report. Violates Board Order 6-01-033, WDR section III.C.1 and MRP section IX.B.1	Water Board staff is working with the discharger to correct reporting deficiencies.		
B	USDI National Park Service Death Valley	DVNM HDQ Furnace Creek WWTF	Reporting -> Late Report	7/15/2018	Submitted quarterly SMR 24 days late. Violated Board Order No E6V-1986-0084 MRP II.	Discharger did not propose or identify any corrective actions taken.	Staff Enforcement Letter	8/10/2018
B	Eastern Sierra CSD	Eastern Sierra CSD WWTF	Reporting -> Deficient Reporting	9/30/2018	Failed to provide parameters related to flow monitoring. Violated Board Order No. R6V-1994-0024 MRP I.A.1-5.	Discharger stated that the newly installed ultrasonic flow sensor was not working properly.		
B	Eastern Sierra CSD	Eastern Sierra CSD WWTF	Water Quality -> Effluent -> CAT1	7/31/2018	Biochemical Oxygen Demand (BOD) (5-day @ 20 Deg. C) 30-Day Average limit is 50 mg/L and reported value was 84 mg/L.	Discharger did not propose or identify any corrective actions taken.		
B	Eastern Sierra CSD	Eastern Sierra CSD WWTF	Water Quality -> Receiving Water -> Groundwater	9/11/2018	Exceeded MCL for Nitrate as Nitrogen (10.0 mg/L) in two wells. Violated Board Order No. R6V-1994-0024 WDR I.B.5.	Discharger did not propose or identify any corrective actions taken.		

## Violations Report - 3rd Quarter 2018

July 1, 2018 to October 31, 2018

Violation Class	Responsible Party	Place (Facility)	Violation Type	Date Occurred	Violation Description	Corrective Action	Enforcement Action (EA)	EA Effective Date
B	USDI National Park Service Death Valley	Furnace Creek Class III LF	Reporting -> Late Report	7/30/2018	Failed to submit the First Semi-Annual 2018 Monitoring Report. Violates Board Order 6-96-158, WDR section IV.C.1	Water Board staff is working with the discharger to determine appropriate next steps.		
B	US Tungsten Div. of Stratcor	Rovana Housing Package STP	Water Quality -> Receiving Water -> Groundwater	9/12/2018	Exceeded MCL for NO3 as N (10.0 mg/L) in one well. Violated Board Order No. R6V-1986-0111 WDR I.B.3.	Discharger did not propose or identify any corrective actions taken.		
<b>Kern County</b>								
2	Muroc Joint Unified School District	Boron Junior Senior High School	Storm Water - No SWPPP	9/20/2018	No SWPPP on site; SWPPP was written and submitted to SMARTS. No vehicle track in and out stabilization, concrete washout was not maintained properly (spill evident), hazardous materials were on pallet and not on secondary containment, hydrocarbon spill evident on site.			
B	US Air Force Edwards Air Force Base	Airforce Research Lab STP	Water Quality -> Effluent -> OEV	9/28/2018	Dissolved Oxygen Monthly Discharge limit is 1.0 mg/L and reported value was 0.6 mg/L.	There was a phone call from base and discussed with Water Board staff, Amanda Lopez. Repairs of the two aerators is pending, two other aerators are still in functioning condition.		
B	Kern County Public Works Department	Boron Class III Landfill	Deficient Monitoring	8/14/2018	Failed to conduct unsaturated zone monitoring according to approved monitoring procedures. Violates Board Order R6V-2016-0004, MRP section II.A.2.c.	Water Board staff are working with the discharger to determine appropriate next steps.		

Attachment A  
Violations Report - 3rd Quarter 2018  
July 1, 2018 to October 31, 2018

Violation Class	Responsible Party	Place (Facility)	Violation Type	Date Occurred	Violation Description	Corrective Action	Enforcement Action (EA)	EA Effective Date
B	US Borax Inc	Boron Mine Facility	Order Conditions	7/31/2018	Exceeded the Action Leakage Rates for pond BAP-2 lower caisson (600 gpd), BAP-3 lower caisson (600 gpd), and BAP-4 lower caisson (600 gpd) during the first semi-annual monitoring period. Violates Board Order R6V-2015-0057, MRP section II.A.4.b.	Water Board staff is coordinating with the discharger to determine appropriate next steps regarding BAP2 because the flowmeter was replaced but anomalous readings were still observed in June. Several holes in the upper LCRS of BAP3 which remains out of service for additional inspection and repairs. BAP4 returned to normal and no additional action is being pursued at this time.		
B	Inyokern CSD	Inyokern CSD WTF	Water Quality -> Effluent -> CAT1	7/10/2018	Biochemical Oxygen Demand (BOD) (5-day @ 20 Deg. C) Daily Maximum limit is 45 mg/L and reported value was 92.0 mg/L.	Discharger did not propose or identify any corrective actions taken.		
B	Inyokern CSD	Inyokern CSD WTF	Water Quality -> Effluent -> CAT1	7/10/2018	Biochemical Oxygen Demand (BOD) (5-day @ 20 Deg. C) Daily Maximum limit is 45 mg/L and reported value was 57 mg/L.	Discharger did not propose or identify any corrective actions taken.		
B	Ridgecrest City	Ridgecrest Reclamation Irrigation Site	Water Quality -> Receiving Water -> Groundwater	7/11/2018	Exceeded MCLs for Arsenic (0.010 mg/L), Chloride (500 mg/L), and TDS (1000 mg/L) in multiple wells. Violated Board Order No. R6V-1993-0086 Section I.B.3.	Discharger did not propose or identify any corrective actions taken.		
B	Ridgecrest City	Ridgecrest WTF	Water Quality -> Receiving Water -> Groundwater	7/11/2018	Exceeded MCLs for Arsenic (0.010 mg/L), and TDS (1000 mg/L) in multiple wells. Violated Board Order No. R6V-2000-0056 Section I.B.2.b.	Discharger did not propose or identify any corrective actions taken.		
B	Kern County Public Works Department	Ridgecrest/Inyokern Landfill	Reporting -> Deficient Reporting	8/14/2018	Failed to include all information related to the unsaturated zone monitoring of the soil-pore liquid. Violates Board Order R6V-2016-0051, MRP section IV.A.1.f.	Water Board staff is working with the discharger to determine appropriate next steps.	Staff Enforcement Letter	11/5/2018

Attachment A

Violations Report - 3rd Quarter 2018  
July 1, 2018 to October 31, 2018

Violation Class	Responsible Party	Place (Facility)	Violation Type	Date Occurred	Violation Description	Corrective Action	Enforcement Action (EA)	EA Effective Date
B	Rosamond CSD	Rosamond WTF (Ponds)	Water Quality -> Receiving Water -> Groundwater	8/21/2018	Exceeded MCL for Nitrate as N (10 mg/L), and TDS (1000 mg/L) in multiple wells. Violated Board Order No. R6V-2015-0069 III.C.2.e.	Discharger did not propose or identify any corrective actions taken. WDR has a time schedule to come into compliance.		
B	Kern County Public Works Department	Tehachapi Class III Landfill	Deficient Monitoring	8/14/2018	Failed to conduct unsaturated zone monitoring according to approved monitoring procedures. Violates Board Order R6V-2016-0032, MRP section II.A.2.c.	Water Board staff is working with the discharger to determine appropriate next steps.		
<b>Lassen County</b>								
2	Caltrans District 2	02 0H6304 Lower Antelope Curve	Storm Water - Deficient BMP Implementation	9/13/2018	Deficient BMP implementation in violation of 2009-0009-DWQ Attachment D. See inspection report for details.		Staff Enforcement Letter	9/25/2018
2	Caltrans District 2	02 4F9904 Susanville Pavement Rehabilitation	Storm Water - Deficient BMP Implementation	9/13/2018	Deficient BMP implementation in violation of 2009-0009-DWQ Attachment D. See inspection report for details.		Staff Enforcement Letter	9/25/2018
B	California Department of Corrections and Rehabilitation	Ccc @ Susanville, Csp-Lc CS	Water Quality -> Sanitary Sewer Overflow/Spill/	9/3/2018	Pump station failure caused an 18,000-gallon raw sewage discharge to a catch basin behind wastewater treatment plant. No surface water body affected.	Pump station operations and flow restored. Discharger recovered approximately 12,000 gallons.		
<b>Mono County</b>								
B	Mono Cnty DPW	Bridgeport SWDS	Water Quality -> Receiving Water -> Groundwater	7/2/2018	Exceeded background concentrations (less than the MDL) for benzene, 1,4-dichlorobenzene, 1,1-dichloroethane, cis-1,2-dichloroethene, dichlorodifluoromethane, tetrachloroethene, toluene, trichloroethene, and trichlorofluoromethane during the first semi-annual 2018 monitoring period. Violates Board Order R6T-2009-0019, WDR section II.A.12.	Water Board staff are working with Mono County to remediate impacts to groundwater.		

Attachment A  
Violations Report - 3rd Quarter 2018  
July 1, 2018 to October 31, 2018

Violation Class	Responsible Party	Place (Facility)	Violation Type	Date Occurred	Violation Description	Corrective Action	Enforcement Action (EA)	EA Effective Date
B	Ca Dept of Fish & Game Independence	Hot Creek Hatchery NPDES	Water Quality -> Effluent -> OEV	7/16/2018	Flow Daily Maximum limit is 3.8 MGD and reported value was 4.3 MGD at M-003.	Use limit set in Time Schedule Order.	Time Schedule Order	5/11/2009
B	Mono Cnty DPW	Benton Class III Landfill	Deficient Monitoring	8/15/2018	Failed to report information related to final cover monitoring and the groundwater detection monitoring network. Violates Board Order R6V-2008-0008, WDR section II.B., and MRP sections II.A. and IV.A.5	Discharger identifies Mono County is responsible for final cover monitoring; however, no discussion related to the reason downgradient monitoring well MW3 was not sampled.		
B	Mono Cnty DPW	Benton Class III Landfill	Order Conditions	8/15/2018	Failed to conduct verification procedures for newly detected volatile organic compounds in groundwater and to notify the Water Board. Violates Board Order R6V-2008-0008, WDR sections II.B and III.B. and MRP section IV.B	Discharger did not propose or identify corrective actions.		
B	Ca Dept of Fish & Game Independence	Hot Creek Hatchery NPDES	Water Quality -> Effluent -> CAT1	7/9/2018	Nitrite Plus Nitrate (as N) Monthly Average limit is 0.23 mg/L and reported value was 0.28 mg/L at M-004.	Use limit in Time Schedule Order.	Time Schedule Order	5/11/2009
B	Ca Dept of Fish & Game Independence	Hot Creek Hatchery NPDES	Water Quality -> Effluent -> CAT1	7/9/2018	Nitrite Plus Nitrate (as N) Monthly Average limit is 0.23 mg/L and reported value was 0.25 mg/L at M-003.	Use limit in Time Schedule Order.	Time Schedule Order	5/11/2009
B	Ca Dept of Fish & Game Independence	Hot Creek Hatchery NPDES	Water Quality -> Effluent -> OEV	8/15/2018	Flow Daily Maximum limit is 3.8 MGD and reported value was 6.3 MGD at M-003.	Use limit in Time Schedule Order.	Time Schedule Order	5/11/2009
B	Ca Dept of Fish & Game Independence	Hot Creek Hatchery NPDES	Water Quality -> Effluent -> OEV	9/10/2018	Flow Daily Maximum limit is 3.8 MGD and reported value was 5.9 MGD at M-003.	Use limits set in the Time Schedule Order.	Time Schedule Order	5/11/2009
B	Mono Cnty DPW	Walker Landfill	Water Quality -> Receiving Water -> Groundwater	7/2/2018	Exceeded background concentrations for 1, 1-dichloroethane, tetrachloroethene, trichloroethene, and trichlorofluoromethane during the first semi-annual 2018 monitoring period. Violates Board Order R6T-2010-0025, WDR section II.A.12.	Discharger is currently implementing an Evaluation Monitoring Program.		

Attachment A  
 Violations Report - 3rd Quarter 2018  
 July 1, 2018 to October 31, 2018

Violation Class	Responsible Party	Place (Facility)	Violation Type	Date Occurred	Violation Description	Corrective Action	Enforcement Action (EA)	EA Effective Date
<b>Nevada County</b>								
3	Coburn Crossing Apartments	Coburn Crossing Apartments	Storm Water - Deficient BMP Implementation	8/9/2018	Tracking controls need to be maintained at east and southwest entrances of project.			
<b>Placer County</b>								
2	Palisades Development LLC	Palisades at Squaw	Storm Water - Deficient BMP Implementation	8/29/2018	Proper BMP implementation not maintained site-wide. Please see inspection report from 8/29/18.			
2	Federal Highway Administration CFLHD	Truckee River Bridge	Storm Water - Deficient BMP Implementation	8/9/2018	Deficient BMP implementation in violation of 2009-0009-DWQ Attachment D.		Staff Enforcement Letter	8/20/2018
2	Tahoe Truckee Sanitation Agency	Truckee River Interceptor Manhole 81 to Manhole 83 Improvements	Storm Water - Deficient BMP Implementation	9/11/2018	Deficient BMP implementation in violation of 2009-0009-DWQ Attachment D.		Staff Enforcement Letter	9/18/2018
<b>San Bernardino County</b>								
2	Caltrans District 8	08 0N9714 Rte. 395 Widening	Storm Water - Deficient BMP Implementation	9/20/2018	CalTrans widening of north and southbound lanes on Highway 395 on a stretch about 2 to 5 miles south of Kramer Junction. August rain generated flow that undermined the silt fence that protects the detention basin nearest to the big vehicle (scrapers, cranes, bull dozers) staging area.			

Attachment A

Violations Report - 3rd Quarter 2018  
July 1, 2018 to October 31, 2018

Violation Class	Responsible Party	Place (Facility)	Violation Type	Date Occurred	Violation Description	Corrective Action	Enforcement Action (EA)	EA Effective Date
2	Caltrans District 8	D Street	Storm Water - Deficient BMP Implementation	9/26/2018	Dewatering flow from a cofferdam, 2 inch pipe, was pumped through a filter fabric sock of approximately 150 gallon capacity. The attachment between filter and pipe was leaking so that a fraction of the flow was not being treated. The discharge was examined closely and appeared to be < 2 NTU turbidity. No sample was taken to test for turbidity or suspended solids.			
3	San Bernardino Cnty Regional Parks	Lake Gregory Sediment Management and Bioretention	Order Conditions	7/15/2018	Submit Annual Reports for FY 2017 and FY 2018		Staff Enforcement Letter	10/23/2018
A	San Bernardino Cnty Special Districts	CSA 79 CS (Green Valley Lake)	Water Quality -> Sanitary Sewer Overflow/Spill/	7/27/2018	Contractor for Southern California Edison (SCE) bored through gravity sewer mainline while installing new SCE power pole causing 10,725 gallons of sewage to spill from Manhole 19 on HWY 18 southwest of Green Valley Lake Road. Discharge entered Dry Creek, which did not have any surface flow at the time of the spill.	Discharger shut down Ahwahnee Lift Station and set up bypass system to reduce sewage flow to the damaged sewer line. Discharger cleared the blockage created by power pole installation and repaired damaged sewer line. Discharge was not susceptible to recovery due to high infiltration rate of area surrounding the manhole.		
B	MHC Los Ranchos Limited Partnership	Los Ranchos MHP	Other Condition	8/20/2018	Wet well floats became detached and inoperable due to corroded attachment components, causing a pump station shutdown and the discharge of approximately 1,000 gallons of treated wastewater. The discharge flowed approximately 100 yards down the road.	Discharger recovered a portion of the discharge and disinfected (lime) affected area. Discharger remounting floats using stainless steel components to prevent future corrosion of float attachment components.	Staff Enforcement Letter	8/22/2018

Attachment A  
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July 1, 2018 to October 31, 2018

Violation Class	Responsible Party	Place (Facility)	Violation Type	Date Occurred	Violation Description	Corrective Action	Enforcement Action (EA)	EA Effective Date
A	Victorville City	Victorville SD CS	Water Quality -> Sanitary Sewer Overflow/Spill/	9/18/2018	Debris and rags caused 24,450 gallons of sewage to spill from Manhole at Sewer Manhole (SWRMH-004959) to Drainage Channel D-125. Surface water body affected (Drainage Channel D-125).	Discharger cleared the blockage, recovered 3,000 gallons, and disinfected the affected area. Discharger will be elevating manhole structures to prevent future burying and difficulty locating manholes in the area.		
A	Barstow City	Barstow WTF Mojave River Bed	Water Quality -> Receiving Water -> Groundwater	7/10/2018	Exceeded reporting limit for Nitrate as N (7 mg/L) in two wells. Violated Board Order No. R6V-1994-0026 I.B.5.	The City contests this violation to be solely from WWTP operations. City is working with WB to address nitrate problem by proposing pump and treat.	Oral Communication	7/25/2017
B	MP Mine Operations LLC	COMMUNITY & CO LANDFILLS-Molycorp	Reporting -> Late Report	8/1/2018	Failure to submit First Semiannual Groundwater Monitoring Report for 1st and 2nd quarter 2018. As of August 14, 2018, the report has not been submitted.	MPMO must submit the groundwater monitoring report.	Oral Communication	8/14/2018
B	Crestline SD	Crestline SD Three WTF's	Order Conditions	9/24/2018	Discharged treated wastewater from Cleghorn wastewater treatment plant to unauthorized disposal area, 1,000 feet away from the Silverwood Lake and 2,000 feet away from the facility. Violates Board Order No. 6-94-57, WDR I.D.6.	Turned off Cleghorn wastewater treatment effluent pump. No recovery. Measured residual chlorine in effluent, 3.8 mg/L.		
B	Ringle, Alex	Eddie World Travel Center Commercial Development	Reporting -> Late Report	8/1/2018	No SMR submitted. Violated Board Order No. 2014-0153-DWQ MRP VII.	Discharger did not propose or identify any corrective actions taken.		
B	Ringle, Alex	Eddie World Travel Center Commercial Development	Reporting -> Late Report	8/1/2018	The report was due on 8/1/2018 and the report was received on 11/1/2018. The report was 92 days late. Violated Board Order No. 2014-0153-DWQ MRP VII.			

Attachment A

Violations Report - 3rd Quarter 2018

July 1, 2018 to October 31, 2018

Violation Class	Responsible Party	Place (Facility)	Violation Type	Date Occurred	Violation Description	Corrective Action	Enforcement Action (EA)	EA Effective Date
B	CH2M Hill(+)	Fort Irwin WTF	Order Conditions	7/3/2018	Effluent coliform bacteria was detected at an MPN of 130 and 500 per 100 ml on July 7 and 8th violating WDR II.C.2 and MRP D.3.a.ii (total MPN of 23/100 ml in no more than one sample in any 30-day period). The 500 per 100 ml result also violated WDR II.C.3 and MRP D.3.a.iii (MPN of 240/100 ml cannot be exceeded at any time). WDR II.C.1 and MRP D.3.a.i was violated on July 8th (median cannot exceed coliform MPN of 23/100 ml over a 7-day period).	At this time discharger did not propose or identify any corrective actions taken.		
B	CH2M Hill(+)	Fort Irwin WTF	Reporting -> Deficient Reporting	8/30/2018	Insufficient reporting. Lab results missing as an attachment or appendix to summary report. Failed to provide results for several parameters related to flow monitoring, effluent quality, and surface water quality. Violated Board Order No. R6V-2004-0005 MRP I.A.1-6	WB staff contacted the discharger and notified them to include lab results in their SMRs going forward. Discharger should do a thorough review of their SMRs before submitting to the WB.		

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Violations Report - 3rd Quarter 2018  
July 1, 2018 to October 31, 2018

Violation Class	Responsible Party	Place (Facility)	Violation Type	Date Occurred	Violation Description	Corrective Action	Enforcement Action (EA)	EA Effective Date
B	CH2M Hill(+)	Fort Irwin WTF	Unauthorized Discharge	7/31/2018	OES Call (#18-5156) was made to report a 20,000-gallon spill due to a sewer main blockage. Rags, rocks and ammunition were found in the sewage.	A vacuum truck was used to capture as much of the ponded sewage as possible. The collected water was taken to the nearby water treatment plant for treatment. The sewer line was bypassed temporarily while the line was cleaned. A vactor truck was used to rod the obstructed line and to vacuum foreign material. The line was cleared via video inspection. The portion of the sewer line that broke was replaced with new 24-inch pipe. Powdered lime was applied to the affected area. The affected soil was scooped up and is temporarily stored at the Wastewater Treatment Facility where it is being dried out before sampling.		
B	CH2M Hill(+)	Fort Irwin WTF	Water Quality -> Effluent -> OEV	8/11/2018	Total Coliform Daily Maximum limit is 240 MPN/100 mL and reported value was 300 MPN/100 mL.	Discharger did not propose or identify any corrective actions taken.		
B	CH2M Hill(+)	Fort Irwin WTF	Water Quality -> Effluent -> OEV	8/13/2018	Total Coliform Not to exceed a specific limit more than once within any 30-day period. limit is 23 MPN/100 mL and reported value was 30 MPN/100 mL.	Discharger did not propose or identify any corrective actions taken.		
B	CH2M Hill(+)	Fort Irwin WTF	Water Quality -> Receiving Water -> Groundwater	8/30/2018	Exceeded MCLs for TDS (1000mg/L); Nitrate as N (10mg/L). Violated Board Order: R6V-2004-0005 WDR Req. I. B. 2.	TDS and Nitrate results are part of an ongoing 13267 Investigative Order (R6V-2010-0030A4).		

## Attachment A

Violations Report - 3rd Quarter 2018  
July 1, 2018 to October 31, 2018

Violation Class	Responsible Party	Place (Facility)	Violation Type	Date Occurred	Violation Description	Corrective Action	Enforcement Action (EA)	EA Effective Date
B	MP Mine Operations LLC	Mountain Pass Mine & Mill Ops	Reporting -> Late Report	7/30/2018	Failure to submit First Semiannual Groundwater Monitoring Report for 1st and 2nd quarter 2018. As of August 14, 2018, the report has not been submitted.	MPMO must submit the groundwater monitoring report.	Oral Communication	8/14/2018
B	MP Mine Operations LLC	Mountain Pass Mine & Mill Ops	Unauthorized Discharge	7/23/2018	Three totes (Approximately 850 gallons) fell off of a flat bed truck. The totes contained solvent extraction pregnant solution (high concentration of Rare earth minerals and HCl, approximate pH 2). Incident occurred in front of site H&S personnel and California Rad Health (onsite inspection). No water ways were affected. Soil is impacted.	Area bermed with soil. Impacted soil has been removed. Soil was analyzed for pH and CAM 17 metals, pending analytical results, soil will be disposed of at the NWTDF or shipped off-site for disposal.	Oral Communication	7/23/2018
B	MP Mine Operations LLC	Mountain Pass P-1 Closure	Reporting -> Late Report	7/30/2018	Failure to submit First Semiannual Groundwater Monitoring Report for 1st and 2nd quarter 2018. As of August 14, 2018, the report has not been submitted.	MPMO must submit the groundwater monitoring report.	Oral Communication	8/14/2018
B	MP Mine Operations LLC	North Tailing Pond P-16	Reporting -> Late Report	7/31/2018	Failure to submit First Semiannual Groundwater Monitoring Report for 1st and 2nd quarter 2018. As of August 14, 2018, the report has not been submitted.	MPMO must submit the groundwater monitoring report.	Oral Communication	8/14/2018
B	MP Mine Operations LLC	Onsite Evaporation Ponds	Reporting -> Late Report	7/30/2018	Failure to submit First Semiannual Groundwater Monitoring Report for 1st and 2nd quarter 2018. As of August 14, 2018, the report has not been submitted.	MPMO must submit the groundwater monitoring report.	Oral Communication	8/14/2018
B	Peterson, William & Beaver	Shaharold Mine	Reporting -> Late Report	7/15/2018	Failed to submit the first semi-annual 2018 monitoring report. Violates Board Order 99-36, WDR section II.C.1.	Water Board staff is working with the discharger to determine appropriate next steps.		

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Violations Report - 3rd Quarter 2018

July 1, 2018 to October 31, 2018

Violation Class	Responsible Party	Place (Facility)	Violation Type	Date Occurred	Violation Description	Corrective Action	Enforcement Action (EA)	EA Effective Date
B	US Marine Corps Barstow Logistic Base	Yermo Annex IWT Recycle Fac	Order Conditions	7/26/2018	Power outage caused the shutdown of the pumps at the wet well (influent water) for the Industrial Wastewater Treatment Facility. As a result, the wet well overflowed. Approximately 500 gallons of untreated wastewater spilled into a nearby storm drain; a small percentage of water made it to the dirt retention basin at the end of the storm drain (1,000-foot in length). The spill remained on base property. The facility manager noted that the water was pretty clear and was most likely dynamometer cooling tower water - water for the cooling tower is sourced from a potable supply.	IWTRF operators noted that the floats at the wet well need to be replaced, in the mean time, the operators will check the wet well once every hour during normal operations until a permanent solution is in place. Mark noted that an automatic alarm that calls remotely to the IWTRF operators if water levels get too high would serve as a back up in case of pump shutdown or faulty floats.		

**Attachment B  
Pending Formal Enforcement Cases  
3rd Quarter 2018**

<b>Facility</b>	<b>County</b>	<b>Enforcement Action</b>	<b>Current Status</b>	<b>Next Step</b>
<b>Water Board</b>				
Tioga Lodge at Mono Lake	Mono	<b>CAO/Referral to California Attorney General</b> - Requiring removal of debris piles from wetland/riparian habitat and restoration of Post Office Creek and associate wetland/riparian habitat to pre-disturbance conditions.	Implementation of year 1 of Restoration Plan completed.	Oversee (with partner agencies- California Department of Fish and Wildlife and California State Parks) implementation of year 2 of Restoration Plan. <b>[Ongoing]</b>
<b>Executive Officer</b>				
Pat and Ollie's Gateway Gasoline Station	Nevada	<b>Recission Order for Cleanup and Abatement Order (CAO)</b>	Pending 15-day public comment period for proposed Recission Order.	Distribute proposed Recission Order for public comment. <b>[1st Quarter 2019]</b>
Desert View Dairy	San Bernardino	<b>Amended CAO</b>	Advisory Team reviewing proposed Amended CAO.	Advisory Team considering next steps. <b>[Ongoing]</b>
Tahoe Donner Association Equestrian Center	Placer	<b>Recission Order for CAO</b>	Received comments from two parties regarding proposed Recission Order. Working with commenting parties and Discharger to address issues identified in comment letters.	Resolve issues and rescind CAO. <b>[Ongoing]</b>
Terrible Herbst No. 68 UST Case	El Dorado	<b>Recission Order for CAO</b>	Proposed Recission Order out for 15-day public comment period (December 13-31, 2018).	Review any public comments that are submitted and make final decision regarding proposed Recission Order. <b>[1st Quarter 2019]</b>
Lake Tahoe Laundry Works	El Dorado	<b>CAO</b>	Issued letter conditionally accepting CAO-required site investigation work plan.	Oversee implementation of site investigation work plan. <b>[Ongoing]</b>

**Attachment B  
Pending Formal Enforcement Cases  
3rd Quarter 2018**

<b>Facility</b>	<b>County</b>	<b>Enforcement Action</b>	<b>Current Status</b>	<b>Next Step</b>
<b>Prosecution Team</b>				
City of Victorville	San Bernardino	<b>ACL Complaint issued</b> - July 1, 2016.	Completing settlement negotiations.	Provide Settlement Workshop at Water Board Meeting. <b>[May 2019]</b>
Susanville CSD	Lassen	<b>Issue ACL Complaint</b>	Approach Susanville CSD about settlement.	Complete settlement negotiations. <b>[2nd Quarter 2019]</b>
Tahoe Keys Marina	El Dorado	<b>Expedited Payment Letter</b> - Mandatory Minimum Penalty re-issued on October 27, 2016.	Discharger submitted request on November 16, 2016, to dismiss all penalties. Prosecution Team reviewed Discharger's request.	Prosecution Team preparing a revised MMP Expedited Payment Letter with additional violations from the last three years. <b>[2nd Quarter 2019]</b>
Victor Valley Wastewater Reclamation Authority WWTP	San Bernardino	<b>Issue ACL Complaint</b>	Approach VVWRA about settlement.	Complete settlement negotiations. <b>[2nd Quarter 2019]</b>