
North Coast Regional Water Quality Control Board

November 14, 2016

Mrs. Tricia Burt
Keysight Technologies, Inc.
1400 Fountaingrove Parkway
Santa Rosa, CA 95403-1799

Dear Mrs. Burt:

Subject: **Notice of Violation** of Wastewater Reclamation Requirements Order No. 89-140 for Keysight Technologies Inc., Industrial Wastewater Treatment Facility (Facility), Santa Rosa, Sonoma County

File: Keysight Technologies, (formerly Hewlett-Packard Company, Microwave Technology Division), 1400 Fountain Grove Parkway, Santa Rosa
WDID No. 1B820050SON

Keysight Technologies Inc. is hereby given notice that it has violated Discharge Provision 1 of Waste Discharge Requirements Order No. 89-140 (Order No. 89-140) for the release of reclaimed industrial wastewater to the facility's storm water conveyance system and ultimately Paulin Creek.

Background

Keysight Technologies Inc. (Discharger) owns and operates an electronic measurement company located at 1400 Fountaingrove Parkway in Santa Rosa. The Discharger treats approximately 200,000 gallons of industrial manufacturing wastewater daily. The treated wastewater is either used on-site to irrigate landscaped areas of the Keysight Technologies Inc. campus or discharged to the City of Santa Rosa's sanitary sewer system. The reuse of the treated wastewater on-site as irrigation water is regulated under Order No. 89-140.

Applicable Requirements

Order No. 89-140, which was adopted on November 16, 1989, requires that the Discharger comply with the following provision:

Discharge Provisions 1: *The discharge of reclaimed wastewater to land that is not under the control of the discharger is prohibited, except as authorized under "C. Solids Disposal".*

Alleged Violations

Keysight Technologies, Inc. violated Discharge Provision 1 of the Order by discharging reclaimed wastewater to Paulin Creek via the storm drain conveyance system. On August 8, 2016, a leak from a 6-inch irrigation water supply line elbow fitting resulted in a discharge of approximately 4,500 gallons of treated reclaimed industrial wastewater to a storm drain inlet. The leak is estimated to have occurred for approximately 25 minutes before the irrigation supply was shut down and the high irrigation flow alarm was triggered. Environmental Compliance Program staff from the City of Santa Rosa responded to the release and verified that the release had reached Paulin Creek.

Required Actions

No further action is required. The Discharger repaired the irrigation supply line on August 9, 2016, and the use of reclaimed industrial wastewater as irrigation water was restored on August 10, 2016.

Please note that correcting the conditions of non-compliance with Order 89-140 does not preclude future enforcement action for the violations alleged in this notice. The Regional Water Board reserves its rights to fully enforce the law against any violation and threatened violation by taking enforcement actions such as a cease and desist order, time schedule order, administrative civil liabilities, and referral to the State Attorney General. Administrative liabilities may be assessed beginning with the date that a violation first occurred, and not as of the date of this notice. The liabilities can be up to \$5,000 per day per violation pursuant to Water Code section 13350.

If you have any questions regarding this matter, please contact Rachel Prat at (707) 576-2542 or Rachel.Prat@waterboards.ca.gov.

Sincerely,

Josh Curtis
Division Chief
Planning, Stewardship, and Compliance Assurance Division

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Certified Mail Return Receipt Required

cc: Lori LaVine, Keysight Technologies Inc., 1400 Fountaingrove Parkway, Santa Rosa, CA 95403-1799, lori.lavine@keysight.com
Chris Murray, City of Santa Rosa Environmental Compliance Program, 4300 Llano Road, Santa Rosa, CA 95407, CMurray@srcity.org
Matt St.John, Executive Officer, Regional Water Board, Matt.St.John@waterboards.ca.gov
Diana Henriouille, Senior Engineer, Compliance Assurance Unit, Regional Water Board, Diana.Henriouille@waterboards.ca.gov