

**Exhibit A:**  
**Minimum Mandatory Penalty**  
**Effluent Limit Violation Table**  
**For The Time Period From**  
**July 1, 2008 through December 1, 2015**

## Effluent Limitation Violations Requiring Mandatory Minimum Penalties for the period from July 1, 2008 through December 1, 2015

#	Violation Number	Violation Date	Constituent	Pollutant Group	Limitation Period	Limit	Result/Average	Units	Exempted from MMP?	Exempt Reason	% Over Limit	Date 180 Days Prior	Serious or Chronic Violation?	No. of Violations within 180 days	Mandatory Fine?	Water Code	Penalty
1	876511	01/12/2010	Biochemical Oxygen	Group I	Weekly Average	15	20	ug/L	N		33%	07/16/2009	N/A	Ct.1	N		\$ 0
2	876505	01/31/2010	Copper, Total	Group II	Monthly Average	3.4	6	ug/L	N		76%	08/04/2009	Serious	Ct.2	Y	13385(h)	\$ 3,000
3	876506	02/28/2010	Copper, Total	Group II	Monthly Average	6	6.9	ug/L	N		15%	09/01/2009	N/A	Ct.3	N		\$ 0
4	876510	03/02/2010	Copper, Total	Group II	Maximum Daily	10	11	ug/L	N		10%	09/03/2009	Chronic	>Ct.3	Y	13385(f)	\$ 3,000
5	876509	03/31/2010	Copper, Total	Group II	Monthly Average	3.9	11	ug/L	N		182%	10/02/2009	Serious	>Ct.3	Y	13385(h)	\$ 3,000
6	876508	07/31/2010	Copper, Total	Group II	Monthly Average	3.4	6	ug/L	Y		76%	02/01/2010	Serious	>Ct.3	Y	13385(h)	\$ 3,000
7	920054	01/31/2012	Total Coliform	Other	Monthly Minimum	240	300	MPN/100	N		N/A	08/04/2011	N/A	Ct.1	N		\$ 0
8	984472	02/25/2012	Total Coliform	Other	B	23	50	MPN/100	Y	D	N/A	08/29/2011	Exempt	N/A	N		\$ 0
9	942268	02/28/2012	Total Coliform	Other	B	23	170	MPN/100	N		N/A	09/01/2011	N/A	Ct.2	N		\$ 0
10	942269	02/28/2012	Total Coliform	Other	7-Day Median	2.2	4	MPN/100	N		N/A	09/01/2011	N/A	Ct.3	N		\$ 0
11	942270	02/29/2012	Total Coliform	Other	7-Day Median	2.2	4	MPN/100	N		N/A	09/02/2011	Chronic	>Ct.3	Y	13385(f)	\$ 3,000
12	928215	03/01/2012	Total Coliform	Other	7-Day Median	2.2	6	MPN/100	N		N/A	09/03/2011	Chronic	>Ct.3	Y	13385(f)	\$ 3,000
13	928218	03/02/2012	Total Coliform	Other	7-Day Median	2.2	6	MPN/100	N		N/A	09/04/2011	Chronic	>Ct.3	Y	13385(f)	\$ 3,000
14	928231	03/03/2012	Total Coliform	Other	7-Day Median	2.2	4	MPN/100	N		N/A	09/05/2011	Chronic	>Ct.3	Y	13385(f)	\$ 3,000
15	928216	03/04/2012	Total Coliform	Other	7-Day Median	2.2	4	MPN/100	N		N/A	09/06/2011	Chronic	>Ct.3	Y	13385(f)	\$ 3,000
16	928224	03/05/2012	Total Coliform	Other	7-Day Median	2.2	4	MPN/100	N		N/A	09/07/2011	Chronic	>Ct.3	Y	13385(f)	\$ 3,000
17	928217	03/06/2012	Total Coliform	Other	7-Day Median	2.2	4	MPN/100	N		N/A	09/08/2011	Chronic	>Ct.3	Y	13385(f)	\$ 3,000
18	928229	03/06/2012	Biochemical Oxygen	Group I	Weekly Average	15	17	mg/L	N		13%	09/08/2011	Chronic	>Ct.3	Y	13385(f)	\$ 3,000
19	928232	03/07/2012	Total Coliform	Other	7-Day Median	2.2	6	MPN/100	N		N/A	09/09/2011	Chronic	>Ct.3	Y	13385(f)	\$ 3,000
20	928219	03/08/2012	Total Coliform	Other	7-Day Median	2.2	8	MPN/100	N		N/A	09/10/2011	Chronic	>Ct.3	Y	13385(f)	\$ 3,000
21	928233	03/08/2012	Total Coliform	Other	B	23	50	MPN/100	N		N/A	09/10/2011	Chronic	>Ct.3	Y	13385(f)	\$ 3,000
22	928220	03/09/2012	Total Coliform	Other	7-Day Median	2.2	8	MPN/100	N		N/A	09/11/2011	Chronic	>Ct.3	Y	13385(f)	\$ 3,000
23	928221	03/10/2012	Total Coliform	Other	7-Day Median	2.2	8	MPN/100	N		N/A	09/12/2011	Chronic	>Ct.3	Y	13385(f)	\$ 3,000
24	928223	03/11/2012	Total Coliform	Other	7-Day Median	2.2	8	MPN/100	N		N/A	09/13/2011	Chronic	>Ct.3	Y	13385(f)	\$ 3,000
25	928222	03/12/2012	Total Coliform	Other	7-Day Median	2.2	8	MPN/100	N		N/A	09/14/2011	Chronic	>Ct.3	Y	13385(f)	\$ 3,000
26	928225	03/20/2012	Total Coliform	Other	B	23	80	MPN/100	N		N/A	09/22/2011	Chronic	>Ct.3	Y	13385(f)	\$ 3,000
27	942284	04/30/2012	Dichlorobromomethane	Group II	Monthly Average	0.56	0.65	ug/L	N		16%	11/02/2011	Chronic	>Ct.3	Y	13385(f)	\$ 3,000
28	978364	04/30/2012	Cyanide, Total (as CN)	Group II	Monthly Average	4.2	4.9	ug/L	N		17%	11/02/2011	Chronic	>Ct.3	Y	13385(f)	\$ 3,000
29	942286	05/31/2012	Cyanide, Total (as CN)	Group II	Monthly Average	4.2	4.9	ug/L	N		17%	12/03/2011	Chronic	>Ct.3, Ct.1	Y	13385(f)	\$ 3,000
30	984471	01/02/2013	Cyanide, Total (as CN)	Group II	Maximum Daily	8.7	12	ug/L	N		38%	07/06/2012	Serious	Ct.2	Y	13385(h)	\$ 3,000
31	984470	01/02/2013	Cyanide, Total (as CN)	Group II	Monthly Average	4.2	12	ug/L	N		186%	07/06/2012	Serious	Ct.3	Y	13385(h)	\$ 3,000
32	944284	01/15/2013	Biochemical Oxygen	Group I	Weekly Average	15	26	mg/L	N		73%	07/19/2012	Serious	>Ct.3	Y	13385(h)	\$ 3,000
33	944283	01/29/2013	Biochemical Oxygen	Group I	Weekly Average	15	21	mg/L	N		40%	08/02/2012	Serious	>Ct.3	Y	13385(h)	\$ 3,000
34	944285	01/31/2013	Biochemical Oxygen	Group I	Monthly Average	10	13.4	mg/L	N		34%	08/04/2012	Chronic	>Ct.3	Y	13385(f)	\$ 3,000
35	984315	01/31/2013	Copper, Total	Group II	Monthly Average	4.7	5.3	ug/L	Y	C	N/A	08/04/2012	Exempt	N/A	N		\$ 0
36	978508	01/31/2013	Cyanide, Total (as CN)	Group II	Monthly Average	4.2	12	ug/L	N		186%	08/04/2012	Serious	>Ct.3	Y	13385(h)	\$ 3,000
37	984328	02/01/2013	Copper, Total	Group II	Daily Maximum	14.23	61	ug/L	N		329%	08/05/2012	Serious	>Ct.3	Y	13385(h)	\$ 3,000
38	945743	02/19/2013	Biochemical Oxygen	Group I	Weekly Average	15	16	mg/L	N		7%	08/23/2012	Chronic	>Ct.3	Y	13385(f)	\$ 3,000
39	945744	02/26/2013	Biochemical Oxygen	Group I	Weekly Average	15	29	mg/L	N		93%	08/30/2012	Serious	>Ct.3	Y	13385(h)	\$ 3,000
40	978509	02/28/2013	Cyanide, Total (as CN)	Group II	Monthly Average	4.2	5	ug/L	N		19%	09/01/2012	Chronic	>Ct.3	Y	13385(f)	\$ 3,000
41	984327	02/28/2013	Copper, Total	Group II	Monthly Average	5.19	61	mg/L	N		1075%	09/01/2012	Serious	>Ct.3	Y	13385(h)	\$ 3,000
42	945742	02/28/2013	Biochemical Oxygen	Group I	Monthly Average	10	18	mg/L	N		80%	09/01/2012	Serious	>Ct.3	Y	13385(h)	\$ 3,000
43	978505	02/28/2013	Cyanide, Total (as CN)	Group II	Monthly Average	4.2	6.2	ug/L	N		48%	09/01/2012	Serious	>Ct.3	Y	13385(h)	\$ 3,000
44	947213	03/16/2013	Biochemical Oxygen	Group I	Weekly Average	15	21.5	mg/L	N		43%	09/17/2012	Serious	>Ct.3	Y	13385(h)	\$ 3,000
45	947215	03/23/2013	Biochemical Oxygen	Group I	Weekly Average	15	18	mg/L	N		20%	09/24/2012	Chronic	>Ct.3	Y	13385(f)	\$ 3,000
46	947214	03/31/2013	Biochemical Oxygen	Group I	Monthly Average	10	15.7	mg/L	N		57%	10/02/2012	Serious	>Ct.3	Y	13385(h)	\$ 3,000
47	978510	03/31/2013	Cyanide, Total (as CN)	Group II	Monthly Average	4.2	5.8	ug/L	N		38%	10/02/2012	Serious	>Ct.3	Y	13385(h)	\$ 3,000
48	978511	04/30/2013	Cyanide, Total (as CN)	Group II	Monthly Average	4.2	4.3	ug/L	N		2%	11/01/2012	Chronic	>Ct.3	Y	13385(f)	\$ 3,000
49	968025	03/31/2014	Copper, Total	Group II	Monthly Average	5.98	8.1	ug/L	Y	C	N/A	10/02/2013	Exempt	N/A	N		\$ 0
50	978506	03/31/2014	Cyanide, Total (as CN)	Group II	Monthly Average	4.2	5.9	ug/L	N		40%	10/02/2013	Serious	Ct.1	Y	13385(h)	\$ 3,000
51	969684	04/30/2014	Copper, Total	Group II	Monthly Average	5.19	8.1	ug/L	Y	C	N/A	11/01/2013	Exempt	N/A	N		\$ 0
52	971276	04/30/2014	Nitrate, Total (as N)	Group I	Monthly Average	10	19	mg/L	N		90%	11/01/2013	Serious	Ct.2	Y	13385(h)	\$ 3,000
53	985549	12/16/2014	Biochemical Oxygen	Group I	Weekly Average	15	29	mg/L	N		93%	06/19/2014	Serious	Ct.1	Y	13385(h)	\$ 3,000
54	985547	12/23/2014	Biochemical Oxygen	Group I	Weekly Average	15	32	mg/L	N		113%	06/26/2014	Serious	Ct.2	Y	13385(h)	\$ 3,000
55	985546	12/24/2014	Nitrate, Total (as N)	Group I	Monthly Average	10	11	mg/L	N		10%	06/27/2014	N/A	Ct.3	N		\$ 0
56	985545	12/28/2014	Cyanide, Total (as CN)	Group II	Daily Maximum	8.7	9.2	ug/L	N		6%	06/29/2014	Chronic	>Ct.3	Y	13385(f)	\$ 3,000
57	985548	12/30/2014	Biochemical Oxygen	Group I	Weekly Average	15	23	mg/L	N		53%	07/03/2014	Serious	>Ct.3	Y	13385(h)	\$ 3,000
58	985550	12/31/2014	Cyanide, Total (as CN)	Group II	Monthly Average	4.2	9.2	ug/L	N		119%	07/04/2014	Serious	>Ct.3	Y	13385(h)	\$ 3,000
59	985552	12/31/2014	Biochemical Oxygen	Group I	Monthly Average	10	17.6	mg/L	N		76%	07/04/2014	Serious	>Ct.3	Y	13385(h)	\$ 3,000
60	985551	12/31/2014	Copper, Total	Group II	Monthly Average	4.45	6.4	ug/L	Y	C	N/A	07/04/2014	Exempt	N/A	N		\$ 0

61	986984	01/13/2015	Biochemical Oxygen	Group I	Weekly Average	15	30	mg/L	N		100%	07/17/2014	Serious	>Ct.3	Y	13385(h)	\$ 3,000
62	986978	01/20/2015	Biochemical Oxygen	Group I	Weekly Average	15	110	mg/L	N		633%	07/24/2014	Serious	>Ct.3	Y	13385(h)	\$ 3,000
63	986979	01/27/2015	Biochemical Oxygen	Group I	Weekly Average	15	150	mg/L	N		900%	07/31/2014	Serious	>Ct.3	Y	13385(h)	\$ 3,000
64	986982	01/27/2015	Biochemical Oxygen	Group I	Weekly Average	73	110	lb/day	N		51%	07/31/2014	Serious	>Ct.3	Y	13385(h)	\$ 3,000
65	986981	01/31/2015	Biochemical Oxygen	Group I	Monthly Average	48	49	lb/day	N		2%	08/04/2014	Serious	>Ct.3	Y	13385(i)	\$ 3,000
66	986980	01/31/2015	BOD5 @ 20 Deg. C.	Group I	Monthly Average	85	60	%	N		-29%	08/04/2014	Serious	>Ct.3	Y	13385(h)	\$ 3,000
67	986977	01/31/2015	Biochemical Oxygen	Group I	Monthly Average	10	76	mg/L	N		660%	08/04/2014	Serious	>Ct.3	Y	13385(h)	\$ 3,000
68	986983	01/31/2015	Copper, Total	Group II	Monthly Average	5.64	8.3	ug/L	Y	C	N/A	08/04/2014	Exempt	N/A	N		\$ 0
69	986976	01/31/2015	Cyanide, Total (as CN)	Group II	Monthly Average	4.2	6.8	ug/L	N		62%	08/04/2014	Serious	>Ct.3	Y	13385(h)	\$ 3,000
70	988468	02/03/2015	Cyanide, Total (as CN)	Group II	Maximum Daily	8.7	13	ug/L	N		49%	08/07/2014	Serious	>Ct.3	Y	13385(h)	\$ 3,000
71	988465	02/07/2015	Biochemical Oxygen	Group I	Weekly Average	15	54	mg/L	N		260%	08/11/2014	Serious	>Ct.3	Y	13385(h)	\$ 3,000
72	988466	02/14/2015	Biochemical Oxygen	Group I	Weekly Average	15	31	mg/L	N		107%	08/18/2014	Serious	>Ct.3	Y	13385(h)	\$ 3,000
73	988467	02/28/2015	Copper, Total	Group II	Monthly Average	5.68	9.9	ug/L	Y	C	N/A	09/01/2014	Exempt	N/A	N		\$ 0
74	988463	02/28/2015	Cyanide, Total (as CN)	Group II	Monthly Average	4.2	13	ug/L	N		210%	09/01/2014	Serious	>Ct.3	Y	13385(h)	\$ 3,000
75	988464	02/28/2015	Biochemical Oxygen	Group I	Monthly Average	10	26.2	mg/L	N		162%	09/01/2014	Serious	>Ct.3	Y	13385(h)	\$ 3,000
76	990099	03/31/2015	Biochemical Oxygen	Group I	Monthly Average	10	10.6	mg/L	N		6%	10/02/2014	Chronic	>Ct.3	Y	13385(i)	\$ 3,000
77	991334	04/18/2015	Biochemical Oxygen	Group I	Weekly Average	15	40	mg/L	N		167%	10/20/2014	Serious	>Ct.3	Y	13385(h)	\$ 3,000
78	991331	04/25/2015	Biochemical Oxygen	Group I	Weekly Average	15	26	mg/L	N		73%	10/27/2014	Serious	>Ct.3	Y	13385(h)	\$ 3,000
79	991330	04/28/2015	Turbidity	Other	Instantaneous	0.5	0.74	NTU	Y	A	N/A	10/30/2014	Exempt	N/A	N		\$ 0
80	991329	04/30/2015	Biochemical Oxygen	Group I	Monthly Average	11	13	lbs/month	N		18%	11/01/2014	Chronic	>Ct.3	Y	13385(i)	\$ 3,000
81	991332	04/30/2015	Biochemical Oxygen	Group I	Weekly Average	15	37	mg/L	N		147%	11/01/2014	Serious	>Ct.3	Y	13385(h)	\$ 3,000
82	991333	04/30/2015	Biochemical Oxygen	Group I	Monthly Average	10	18	mg/L	N		80%	11/01/2014	Serious	>Ct.3	Y	13385(h)	\$ 3,000
83	992598	05/06/2015	Turbidity	Other	Instantaneous	0.5	1	NTU	Y	A	N/A	11/07/2014	Exempt	N/A	N		\$ 0
84	992595	05/27/2015	Turbidity	Other	Instantaneous	0.5	1.01	NTU	Y	A	N/A	11/28/2014	Exempt	N/A	N		\$ 0
85	992596	05/31/2015	Turbidity	Other	Instantaneous	0.5	0.52	NTU	Y	A	N/A	12/02/2014	Exempt	N/A	N		\$ 0
86	993514	06/16/2015	Total Suspended Solids	Group I	Weekly Average	11	19.2	lb/day	N		75%	12/18/2014	Chronic	>Ct.3	Y	13385(i)	\$ 3,000
87	993516	06/16/2015	Total Suspended Solids	Group I	Weekly Average	15	37	mg/L	N		147%	12/18/2014	Chronic	>Ct.3	Y	13385(i)	\$ 3,000
88	993515	06/21/2015	Turbidity	Other	Instantaneous	0.5	0.72	NTU	Y	A	N/A	12/23/2014	Exempt	N/A	N		\$ 0
89	993517	06/27/2015	Turbidity	Other	Instantaneous	0.5	0.65	NTU	Y	A	N/A	12/29/2014	Exempt	N/A	N		\$ 0
90	995177	07/01/2015	Turbidity	Other	Instantaneous	0.5	0.71	NTU	Y	A	N/A	01/02/2015	Exempt	N/A	N		\$ 0
91	995183	07/08/2015	Turbidity	Other	Instantaneous	0.5	0.76	NTU	Y	A	N/A	01/09/2015	Exempt	N/A	N		\$ 0
92	995180	07/11/2015	Turbidity	Other	Instantaneous	0.5	1	NTU	Y	A	N/A	01/12/2015	Exempt	N/A	N		\$ 0
93	995182	07/12/2015	Turbidity	Other	Instantaneous	0.5	0.82	NTU	Y	A	N/A	01/13/2015	Exempt	N/A	N		\$ 0
94	995178	07/13/2015	Turbidity	Other	Instantaneous	0.5	0.8	NTU	Y	A	N/A	01/14/2015	Exempt	N/A	N		\$ 0
95	995179	07/19/2015	Turbidity	Other	Instantaneous	0.5	1	NTU	Y	A	N/A	01/20/2015	Exempt	N/A	N		\$ 0
96	995181	07/23/2015	Turbidity	Other	Instantaneous	0	1.01	NTU	Y	A	N/A	01/24/2015	Exempt	N/A	N		\$ 0

Total Penalty: \$ 210,000

NOTES:

A= Discharger was not discharging to receiving waters during the time period when this violation occurred, and is thus exempt from an MMP

B= Not to exceed a specific limit more than once within any 30 day period

C= Discharger is in compliance with a CDO issued on January 19, 2012 which requires the discharger to implement actions to correct copper violations. Per Water Code section 13385 (j)(3), a discharger is exempt from a MMP for a violation of an effluent limitation where the waste discharge is in compliance with either a cease and desist order issued pursuant to Section 13301 or a time schedule order issued pursuant to Section 13300 or 13308 if the CDO/TSO was issued after 07/01/2000 and it specifies the actions that the discharger is required to take in order to correct the violations that would otherwise be subject to an MMP.

D=The discharger is reporting that this exceedance is the first instance within a 30 day period where the reported Total Coliform value exceeded the limitation set forth in the order. Order No. R1-2012-0012, Effluent Limit B.4. requires that the number of coliform bacteria shall not exceed an MPN of 23 per 100 mL in more than one sample in any 30-day period. As this is the first exceedance in a 30-day time period, it is exempted from an MMP violation.

Ct=Count - Number of exceedances in the past 180 days including this violation. A count>Ct.3 means that a penalty under Water Code section 13385 (i) applies, if the violation is considered chronic. If a the violation is considered serious, a penalty applies no matter how many exceedances occurred in the past 180 days.

- 1 - Violation occurs on sample date or last date of averaging period.
- 2 - For Group I pollutant a violation is serious when the limit is exceeded by more than 40%
  - For Group II pollutant a violation is serious when the limit is exceeded by more than 20%
- 3 - When a serious violation occurs on the same day as a chronic, the serious violation is only assessed an MMP once and is counted last in determining number of chronic violations in past 180 days.

Violation period ending the last day of July 2015

Group I Violations Assessed MMP: 33  
 Group II Violations Assessed MMP: 22  
 Other Effluent Violations Assessed MMP: 15  
 Violations Exempt from MMP: 20  
 Total Violations Assessed MMP: 70

Mandatory Minimum Penalty = (39 Serious Violations + 31 Non-Serious Violations) x \$3,000 = \$210,000