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## North Coast Regional Water Quality Control Board

August 17, 2021

Certified Mail No. 7016 2070 0000 6486 2558

Mr. Chad Barksdale, Executive Director  
West County Transportation Santa Rosa  
367 W. Robles Avenue  
Santa Rosa, CA 95407  
[cbarksdale@schoolbusing.org](mailto:cbarksdale@schoolbusing.org)

Dear Mr. Barksdale:

**Subject: Notice of Violation: West County Transportation Santa Rosa failure to Collect and analyze samples of stormwater runoff for the 2016-17, 2018-2019, and 2019-2020 reporting years and failure to submit the 2020-2021 annual report required by the State Water Resources Control Board Order No. 2014-0057 DWQ General Permit for Storm Water Discharges Associated with Industrial Activities (Industrial General Permit)**

**File:** West County Transportation Santa Rosa, 367 W. Robles Avenue, Santa Rosa, Sonoma County, WDID No. 1 49I010400

West County Transportation Santa Rosa (hereinafter "Permittee" or "you") operates a facility located at 367 W. Robles Avenue in Santa Rosa and is subject to the requirements of the Industrial General Permit.

Under section XVI.A of the Industrial General Permit, you were required to submit and certify via the SMARTS database an annual report for the 2020-2021 reporting year.

According to our records, the 2020-2021 annual report that was due on July 15, 2021, has not been submitted.

**You are required to submit the 2020-2021 annual report by August 31, 2021.**

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GREGORY A. GIUSTI , CHAIR | MATTHIAS ST. JOHN, EXECUTIVE OFFICER

General Permit Section XI.B. requires the Permittee to collect and analyze stormwater samples from two (2) qualified storm events (QSEs) within the first half of each reporting year, July 1 to December 31, and two (2) QSEs within the second half of each reporting year, January 1 to June 30.

Failure to collect and analyze stormwater samples is a violation of Section XI.B.2 of the General Permit.

According to data available on the Stormwater Multiple Application and Report Tracking System (SMARTS) database, the Permittee did not collect a minimum of four samples from the Facility in the 2016-17, 2018-2019 and 2019-2020 reporting years; however, other enrollees within a few miles radius of the Facility have collected stormwater samples from their facilities during the same period.

Data obtained from the National Oceanic and Atmospheric Administration (NOAA), Santa Rosa Sonoma County Airport station, shows the Permittee experienced significant storm events, totaling approximately 60 inches of rain during 2016-2017, a total of approximately 25 inches of rain during 2017-2018, a total of approximately 50 inches of rain during 2018-2019, a total of approximately 20 inches of rain during 2019-2020, and a total of approximately of 12 inches of rain during the 2020-2021 reporting year. Therefore, stormwater samples should have been collected during these periods and the permittee is in violation of the General Permit for not complying with the sampling frequency requirements.

If the permittee claims that no Qualifying Storm Events have occurred during these reporting years, then:

**Submit a detailed report explaining the cause of this violation. Describe the actions you will take to ensure sampling of all future QSEs, analysis of the samples, and submittal of analytical results in accordance with Section XI.B.2 of the General Permit. The report must be uploaded to SMARTS in response to this NOV no later than September 27, 2021. Please note that the supportive documents such as summaries of precipitation data must be included.**

Pursuant to California Water Code section 13385(c)(1), the Permittee is subject to discretionary administrative civil liability of up to ten thousand dollars (\$10,000) for each day in which the violation occurs. The discretionary administrative civil liability may be assessed by the Regional Board beginning with the date that the violation first occurred. Please note that this Notice shall not be deemed to relieve you of liability for any violations that may have already occurred. The Regional Board reserves its right to take any further enforcement action authorized by law, including referring this matter to the Attorney General's Office for further enforcement.

If you have questions about this Notice of Violation (NOV) letter, please contact Regional Water Board Staff Farzad Kasmaei at [Farzad.Kasmaei@waterboards.ca.gov](mailto:Farzad.Kasmaei@waterboards.ca.gov).

Chad Barksdale  
West County Transportation Santa Rosa

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You may also contact Heaven Moore at [Heaven.Moore@waterboards.ca.gov](mailto:Heaven.Moore@waterboards.ca.gov).  
Additionally, we are available to meet with you if you wish to discuss this letter or the  
facility permit requirements in further detail.

Sincerely,

Heaven Moore, P.E.  
Senior Water Resources Control Engineer - NPDES Unit

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**cc: North Coast Regional Water Quality Control Board**  
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