



North Coast Regional Water Quality Control Board

August 17, 2021

Certified Mail No. 7016 2070 0000 6486 2234

Mr. Chad Barksdale, Executive Director
West County Transportation Sebastopol
745 N. Main Street
Sebastopol, CA 95472
cbarksdale@schoolbusing.org

Dear Mr. Barksdale:

Subject: Notice of Violation: West County Transportation Sebastopol failure to Submit the Level 1 Exceedance Response Action (ERA) report, Level 2 ERA Action Plan and to collect samples for several reporting years as 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 Sebastopol, 745 N. Main Street, Sebastopol, Sonoma County, WDID No. 1 49I021050

West County Transportation Sebastopol (hereinafter "Permittee" or "you") operates a facility located at 745 N. Main Street in Sebastopol and is subject to the requirements of the General Permit.

Based on data submitted in the Storm Water Multiple Application and Report Tracking System (SMARTS), the facility's status for Total Suspended Solids (TSS) changed from Baseline to Level 1 in the 2016-2017 reporting year and from Level 1 to Level 2 in the 2020-2021 reporting year because sampling results indicated a Numeric Action Level (NAL) exceedance for the same parameter.

As required by sections XII.C and XII.D of the Industrial General Permit, you were required to submit and certify via the SMARTS database a Level 1 ERA Report by January 1, 2017 and a Level 2 ERA Action Plan by January 1, 2021. The Level 1 ERA and Level 2 ERA Action Plan must be prepared by a Qualified Industrial Stormwater Practitioner (QISP) and meet the requirements in sections XII.C.2 and XII.D.1 of the Industrial General Permit.

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

According to our records, the Level 1 ERA and Level 2 ERA Action Plan that were due on January 1, 2017 and January 1, 2021 respectively, have not been submitted.

You are required to submit the Level 1 ERA and Level 2 ERA Action Plan and update the SWPPP and site map accordingly by September 27, 2021.

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 our records you have failed to meet this sampling and reporting requirement.

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 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 you must:

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.

Chad Barksdale
West County Transportation Sebastopol

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You may also contact Heaven Moore at 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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