



North Coast Regional Water Quality Control Board

June 23, 2021

Certified Mail No. 7016 0750 0001 0048 7426

Ms. Audrey Hitchcock
Ramini Mozzarella LLC
2479 Mar East Street
Tiburon, CA 94920
audreyjhitchcock@gmail.com

Dear Ms. Hitchcock:

Subject: Notice of Violation for Ramini Mozzarella LLC for Failure to Comply with General Waste Discharge Requirements for Dairies in the North Coast Region, Order No. R1-2019-0001

File: Ramini Mozzarella LLC, WDID 1B14112DMAR, Place ID 810550

This Notice of Violation (NOV) is being issued to Ramini Mozzarella LLC (dairy) for failure to submit plans and resolve potential discharges of waste to surface water and groundwater as required by the General Waste Discharge Requirements for Dairies Order No. R1-2019-0001 (GWDR) as previously ordered. Regional Water Board staff issued a Notice of Violation (NOV) to the dairy on September 16, 2020, requiring enrollment for coverage under the GWDR by October 16, 2020. After staff contacted you several times, the North Coast Regional Water Quality Control Board (Regional Water Board) received your Notice of Intent (NOI) for coverage of Ramini Mozzarella LLC dairy under the GWDR on November 18, 2020. We received a check for the \$200 enrollment fee on November 30, 2020. The Regional Water Board issued a letter enrolling the dairy under the GWDR on December 29, 2020. Both letters state that the Water Quality Plan was due by October 16, 2020. On March 22, 2021, an incomplete draft Water Quality Plan and Riparian Management Plan was submitted by the dairy.

We are issuing this second NOV because we have not received the complete Water Quality Plan or Riparian Management Plan (GWDR Appendix 1), as required. Additionally, Regional Water Board staff inspected Ramini Mozzarella on January 27, 2021, and observed potential discharges of waste to receiving waters that must be addressed (see attached inspection report and map). You must submit the complete Water Quality Plan and Riparian Management Plan immediately and must advise Regional Water Board staff as to how and when the dairy will fully implement measures needed to correct and prevent discharges and potential discharges to surface water. Pursuant to the GWDR, you must deploy and maintain temporary and permanent erosion control as needed to prevent discharges of waste to surface waters. As stated

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

in our previous NOV, the dairy operators must familiarize themselves with the GWDR including the Discharge Prohibitions (GWDR section A) to ensure waste discharges do not occur.

The GWDR does not allow threatened discharges. Any unpermitted discharges of waste to waters of the state/waters of the United States are subject to penalties under Water Code sections 13350, 13265, and 13385 authorizing the Regional Water Board to impose an administrative civil liability of up to \$10,000 per violation per day and \$10 per gallon of waste discharged to waters of the United States.

Required Actions

To remedy this NOV and achieve compliance with the GWDR, the dairy operator must submit the following to NorthCoast@waterboards.ca.gov or NCRWQCB, 5550 Skylane Blvd., Suite A, Santa Rosa, CA 95403:

- A. A complete Water Quality Plan including the following information to explain how and when the dairy will prevent discharges and potential discharges to surface water. An incomplete Water Quality Plan was received on March 22, 2021. A detailed Regional Water Board staff review of the Ramini Water Quality Plan is attached. In general, the Water Quality Plan must include:
 1. A description of proposed regular maintenance to be conducted on pollution control systems at the facility to protect surface water and groundwater quality, including a description of temporary and permanent erosion control measures to be used and deployed on the property.
 2. A plan and schedule to conduct regular maintenance of the wastewater tank, including pump out as needed to ensure adequate freeboard will be maintained during precipitation events. The wastewater tank must have adequate freeboard to fully contain daily milk barn wash water and any rainwater mixed with manure, feed, and soil, in order to prevent discharges to Estero De San Antonio Creek.
 3. A plan and schedule to scrape corrals and holding pens that drain toward Estero De San Antonio Creek regularly, and as needed prior to rain events. Include information about designated locations where scraped manure will be taken, and proposed methods/measures to stabilize and/or otherwise prevent scraped manure from causing adverse impacts to receiving waters. Note that manure must either be removed from the dairy, spread out evenly on pastures during the growing season, or placed in a location where the manure cannot discharge to the creek or percolate through the soil to the groundwater. Manure piles may need to be covered during rain events to prevent discharge to surface water and groundwater.

- B. A complete Riparian Management Plan must be submitted. An incomplete Water Quality Plan/Riparian Management Plan was received on March 22, 2021. A detailed Regional Water Board staff review of the Ramini Riparian Management Plan is attached. In general, the Riparian Management Plan must be designed to ensure that riparian areas will be managed to protect water quality. Management measures should include, but are not necessarily limited to allowing natural growth, maintaining sufficient vegetation to prevent erosion, maintaining woody species, excluding animals from surface water or perennial streams, preventing animals from disturbing streambanks, and grazing only when it does not result in waste discharge (soil or manure) to the stream. The Riparian Management Plan must describe how you will maintain or improve riparian vegetation to prevent discharges and potential discharges of waste and sediment to surface waters. The plan must include a schedule for implementing temporary and permanent erosion control measures.

Each day that you fail to submit these plans subjects you to additional potential penalties. We will consider your timeliness in correcting GWDR violations in determining appropriate further enforcement action. I recommend that by no later than July 19, 2021, you contact me at (707) 576-2289 or James.Burke@waterboards.ca.gov or Cherie Blatt at (707) 576-2755 or email Cherie.Blatt@waterboards.ca.gov to advise of your plan and schedule to submit the required plans.

Sincerely,

James Burke
Senior Engineering Geologist

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Attachments:

1. Regional Water Board Inspection Report, January 27, 2021
2. Map of Dairy Sampling Locations by Regional Water Board 1/27/21
3. Regional Water Board review of the incomplete Ramini Water Quality Plan and Riparian Management Plan