

**STATE OF CALIFORNIA
REGIONAL WATER QUALITY CONTROL BOARD
SAN FRANCISCO BAY REGION**

**STAFF SUMMARY REPORT: Brian Thompson
MEETING DATE: September 10, 2025**

**ITEM: 7
Enforcement Actions and Priorities for Fiscal Year 2025/26 – Summary Report**

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DISCUSSION

This item summarizes enforcement actions for fiscal year (FY) 2024/25, including the issuance or settlement of administrative civil liability complaints. For FY 2025/26, our enforcement priorities will be similar to those for FY 2024/25.

Penalties Imposed

During FY 2024/25, we resolved 21 administrative civil liability enforcement cases with penalties totaling \$4,766,664 (see Tables A1 through A3). These enforcement cases addressed wastewater treatment plant discharges above effluent limits, unauthorized discharges of partially-treated wastewater, failures to submit technical reports required by NPDES permits, and violations of the construction and industrial stormwater general permits. The penalty assessments were consistent with the State Water Board's Enforcement Policy and, as applicable, its Supplemental Environmental Project Policy.

- **Table A1 – Administrative Civil Liability Cases Settled in FY 2024/25**

We settled two cases through stipulated orders imposing penalties of \$4,637,844, of which \$2,241,000 will be used to fund supplemental environmental projects.

- **Table A2 – FY 2024/25 Mandatory Minimum Penalties of Individual NPDES Permits**

We settled 17 cases involving effluent limit violations subject to mandatory minimum penalties of \$3,000 per violation. The stipulated orders imposed total penalties of \$123,000, of which \$21,000 funded supplemental environmental projects.

- **Table A3 – FY 2024/25 Mandatory Penalties of Stormwater General NPDES Permits**

Two mandatory minimum penalty cases for reporting violations went to Executive Officer hearings. The violations were subject to mandatory minimum penalties of \$1,000 per violation and costs incurred by Board staff. Orders imposed total penalties of \$5,820.

Administrative Enforcement and Compliance Assistance

Administrative civil liability enforcement included some notable cases during FY 2024/25. We held our first Executive Officer hearings for mandatory minimum penalties in accordance with authority delegated by the Board ([Executive Officer's Report on Mandatory Minimum Penalty Hearings](#)). We settled a case that incorporated three

different approaches to funding supplemental environmental projects ([Executive Officer's Report on Martinez Refining Company Enforcement](#)). We also settled a case that enforced no-exposure coverage of the industrial stormwater general permit. Some businesses are required to obtain industrial stormwater general permit coverage because of the Standard Industrial Classification for their operations. These businesses can obtain “no-exposure coverage,” which has lower fees and less requirements, through certification that its operations and materials are not exposed to stormwater. We pursued enforcement for not complying with no-exposure conditions, and we plan to investigate other facilities that have certified eligibility for this type of permit coverage.

In addition to pursuing administrative civil liability cases, enforcement staff operate behind the scenes to triage complaints and spills; coordinate spill and wildfire response; and assist regulatory programs with investigations, other enforcement actions (e.g., notices of violation, cleanup and abatement orders), and case management. During FY 2024/25, much of our enforcement resources were dedicated to helping the Watershed Division address illegally filled streams and wetlands, and the Toxics Cleanup Division investigate potential sources of per- and polyfluoroalkyl substances (PFAS).

Public Outreach

We continue to publicize our enforcement efforts. Notifying the regulated community and the public about pending and completed enforcement is an integral part of our enforcement program. Anyone can obtain information about our enforcement cases by [subscribing](#) to our email list, checking the current status of [enforcement cases](#), accessing documents on our website, and following [press releases](#). Additional enforcement-related information and information about supplemental environmental projects are also available on the [State Water Board](#) website.

Fiscal Year 2025/26 Enforcement Priorities

Like previous years, our enforcement priorities for FY 2025/26 will focus on egregious violations with the highest adverse water quality impacts, followed by violations that threaten the integrity of the Board’s requirements. These cases may include, for example, the following:

- unauthorized discharges;
- discharges that result in fish kills or other acute aquatic impacts;
- illegal fill of streams or wetlands, including violations at permitted stream or wetland projects;
- violations of site cleanup requirements; and
- violations of construction, industrial, and municipal stormwater permits.

We will also continue to maintain a near-zero backlog of mandatory minimum penalty assessments and will assist emergency response and recovery efforts associated with spills, wildfires, and vessels.

Consistent with the Enforcement Policy, we will prioritize enforcement efforts in coordination with the Assistant Executive Officers, program staff, and Office of Enforcement liaisons.

Potential enforcement cases are typically suggested by program staff or come from notifications we receive through our complaint hotline, the CalEPA Complaint System, State Office of Emergency Services spill reports, or enforcement task force meetings. Factors we will weigh in prioritizing cases include case-specific factors, such as the magnitude of water quality impact, threat to high-priority watersheds or our regulatory programs, discharger culpability, discharger compliance history, strength of evidence, and possible mitigating circumstances.

APPENDIX

A. Tables of FY 2024/25 Penalty Enforcement Actions

Appendix A
Tables of FY 2024/25
Penalty Enforcement Actions

Appendix A

Tables of FY 2024/25 Penalty Enforcement Actions

Table A1
Administrative Civil Liability Cases Settled in FY 2024/25

Discharger	Location	Allegation	Penalty
Martinez Refining Company	Martinez	Unauthorized Discharges and Effluent Limit Violations NPDES Permit	\$4,482,000 ¹
Allstate Plastics	Hayward	Violation of No Exposure Requirement Industrial Stormwater	\$155,844

Total Administrative Civil Liability Penalties Imposed: \$4,637,844

- ¹ \$2,241,000 of the penalty will go toward supplemental environmental projects to improve water quality in Peyton Channel and McNabney Marsh (\$1,046,000), to cleanup trash in Martinez creeks (\$153,600), and to the Supplemental Environmental Project Fund for the San Francisco Bay Regional Monitoring Program to support studies of polychlorinated biphenyls (PCBs) in San Leandro Bay and sediment fluctuations in a North Bay salt marsh (\$1,041,400).

Table A2
**FY 2024/25 Mandatory Minimum Penalties for
Wastewater NPDES Permit Violations**

Discharger	Location	Violation	Penalty
Exxon Mobile Environmental and Property Solutions	Napa	Effluent Limit Violations	\$3,000
Advanced Micro Devices	Santa Clara	Effluent Limit Violations	\$6,000
IQHQ ELCO Yards	San Mateo	Effluent Limit Violations	\$3,000
Lockheed Martin	Palo Alto	Effluent Limit Violations	\$6,000 ¹
City of Burlingame	Burlingame	Effluent Limit Violations	\$6,000 ¹
Cedar Fain Entertainment	Santa Clara	Effluent Limit Violations	\$21,000
Crockett Cogeneration	Crockett	Effluent Limit Violations	\$3,000
South City Ventures	South San Francisco	Effluent Limit Violations	\$6,000
Tesoro Refining & Marketing	Martinez	Effluent Limit Violations	\$15,000
Millbrae Adrian Science Park	Millbrae	Effluent Limit Violations	\$12,000

Samuel Merritt University	Oakland	Effluent Limit Violations	\$6,000
Santa Clara University	Santa Clara	Effluent Limit Violations	\$12,000
San Francisco, City and County (Oceanside Plant)	San Francisco	Effluent Limit Violations	\$6,000 ¹
San Francisco, City and County (Southeast Plant)	San Francisco	Effluent Limit Violations	\$3,000 ¹
Dupont Specialty Products and Corteva Remediation Group	San Jose	Effluent Limit Violations	\$6,000
City of Benecia	Benecia	Effluent Limit Violations	\$3,000
City of San Mateo	San Mateo	Effluent Limit Violations	\$6,000

Total Mandatory Minimum Penalties for Wastewater NPDES Permit Violations Imposed: \$123,000

- 1 A portion of these penalties was paid to the Supplemental Environmental Project Fund for the San Francisco Bay Regional Monitoring Program. Individual contributions ranged from \$3,000 to \$6,000 and totaled \$21,000.

Table A3
FY 2024/25 Mandatory Penalties of Stormwater General NPDES Permits

Discharger	Location	Violation	Penalty
SODA LLC	Tiburon	Late Annual Report FY 2022/23 Construction Stormwater	\$2,910
LP Acquisitions LLC	Los Gatos	Late Annual Report FY 2022/23 Construction Stormwater	\$2,910

Total Mandatory Penalties for Stormwater General NPDES Permit Violations Imposed: \$5,820