

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

**STAFF SUMMARY REPORT: Brian Thompson
MEETING DATE: September 9, 2026**

ITEM: 7

Enforcement Actions and Priorities for Fiscal Year 2026/27 – Summary Report

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DISCUSSION

This item summarizes formal enforcement actions for fiscal year (FY) 2025/26, including the issuance or settlement of administrative civil liability complaints. It also describes our enforcement priorities for FY 2026/27, which will be similar to those for FY 2025/26.

Penalties Imposed

During FY 2025/26, we resolved 20 administrative civil liability enforcement cases with penalties totaling \$7,449,280 (see Tables below). These enforcement cases addressed wastewater treatment plant discharges above effluent limits, unauthorized discharges of sewage and fireworks, failure to obtain coverage under the construction stormwater general permit, violations of cleanup and abatement orders, odor nuisance, and reporting violations. The penalty assessments were consistent with the State Water Board's Enforcement Policy and, as applicable, its Supplemental Environmental Project Policy.

Administrative Civil Liability Cases Settled in FY 2025/26

We settled six cases through stipulated orders imposing penalties of \$6,570,280, of which \$5,743,490 will be used to fund the supplemental environmental projects and enhanced compliance projects.

Administrative Civil Liability Cases Settled in FY 2025/26

Discharger	Location	Allegation	Penalty
Samira and Saeed Amidhoozour	Woodside	Failure to Enroll Construction Stormwater General Permit	\$167,200
Glovatorium and Stuart Depper	Oakland	Failure to Implement Tasks Cleanup and Abatement Order	\$17,500
C&H Sugar Company and Crockett Community Services District	Crockett	Effluent Limit, Odor, & Report Violations NPDES Permit	\$734,000
Six Flags Entertainment Corporation and Fireworks & Stage FX America, LLC	Santa Clara	Unauthorized Discharge – Fireworks	\$10,000
Delta Diablo	Antioch	Unauthorized Discharges – Sewage Sanitary Sewer Order	\$5,557,700 ¹

Discharger	Location	Allegation	Penalty
California Pacific Bank	Oakland	Self-Monitoring Program Violation Cleanup and Abatement Order	\$83,880

Total Administrative Civil Liability Penalties Imposed: \$6,570,280

\$5,369,490.48 of the penalty was suspended pending completion of two enhanced compliance projects: \$4,330,000 for a Shore Acres Force Main Repair Project; and \$1,039,490.48 for a Wastewater Treatment Plant Outfall Enhancement.

FY 2025/26 Mandatory Minimum Penalties of Individual NPDES Permits

We settled 14 cases involving effluent limit violations subject to mandatory minimum penalties of \$3,000 per violation. The stipulated orders imposed total penalties of \$879,000, of which \$435,000 funded supplemental environmental projects.

**FY 2025/26 Mandatory Minimum Penalties for
Wastewater NPDES Permit Violations**

Discharger	Location	Violation	Penalty
City of Richmond and Richmond Municipal Sewer District No. 1	Richmond	Effluent Limit Violations	\$336,000 ¹
City of St. Helena	St. Helena	Effluent Limit Violations	\$378,000 ²
Napa Sanitation District	Napa	Effluent Limit Violations	\$3,000 ³
Intuitive Surgical, Inc.	Sunnyvale	Effluent Limit Violations	\$6,000
West County Wastewater District City of Richmond and Richmond Municipal Sewer District No. 1	Richmond	Effluent Limit Violations	\$63,000 ⁴
City and County of San Francisco (SFPUC)	San Francisco	Effluent Limit Violations	\$3,000 ³
Chevron Environmental Management Company	Port Costa	Effluent Limit Violations	\$3,000
Broadway Plaza	Redwood City	Effluent Limit Violations	\$15,000
California's Great America	Santa Clara	Effluent Limit Violations	\$6,000
Former 401 National Avenue, Middlefield	Mountain View	Effluent Limit Violations	\$3,000
IQHQ ELCO Yards LP	Redwood City	Effluent Limit Violations	\$18,000
IQHQ ELCO Yards LP	Redwood City	Effluent Limit Violations	\$3,000
City of Millbrae	Millbrae	Effluent Limit Violations	\$6,000

Discharger	Location	Violation	Penalty
City of Sunnyvale	Sunnyvale	Effluent Limit Violations	\$36,000 ³

Total Mandatory Minimum Penalties for Wastewater NPDES Permit Violations Imposed: \$879,000

- 1 \$168,000 of the penalty will go to Kids for the Bay to fund watershed education and trash removal projects at schools within disadvantaged communities in Richmond.
- 2 \$196,500 of the penalty will go to a SEP for a City of St. Helena Sewer Pipeline Rehabilitation Project.
- 3 The penalty, or a portion of it, was paid to the Supplemental Environmental Project Fund for the San Francisco Bay Regional Monitoring Program. Individual contributions ranged from \$3,000 to \$25,500 and totaled \$31,500.
- 4 \$39,000 of the penalty will go to Kids for the Bay to fund watershed education and trash removal projects at schools within disadvantaged communities in Richmond.

Administrative Enforcement and Compliance Assistance

The Board issued Cease and Desist Orders to Alameda County, the City of San Leandro, the City of Richmond, the City of Daly City, and the City of Vallejo and the Vallejo Flood and Wastewater District (Permittees) for not complying with trash load reduction requirements in the [Municipal Regional Stormwater Permit](#). While the Permittees achieved trash load reductions ranging from 66 to 93 percent, they did not achieve the requirement to reach 100 percent reduction from a 2009 baseline by June 30, 2025. The Permittees updated their Trash Load Reduction Plans to describe how the 100 percent reduction would be reached, and the Board considered these plans at its December 2025 meeting and issued Cease and Desist Orders with requirements to bring the Permittees into compliance. Actions to be taken by the Permittees to achieve the 100 percent trash load reduction include the following: installing full trash capture and small-inlet trash capture devices; street sweeping; targeted cleanups based on on-land visual trash assessments; creek and shoreline cleanup projects; and cooperative projects with other parties (e.g., neighboring municipalities, Caltrans, private landowners). The dates to achieve this goal varied within a three-year window (2027 to 2030) according to each Permittee's plan and Cease and Desist Order.

In addition to pursuing administrative civil liability cases, enforcement staff triage complaints and spills; oversee supplemental environmental projects, coordinate spill and wildfire response; and assist with investigations of violations impacting water quality and informal enforcement actions (e.g., notices of violation, cleanup and abatement orders). During FY 2025/26, much of this work focused on addressing illegally filled streams and wetlands. Enforcement staff also participate in an environmental justice collaborative in West Oakland ([West Oakland Environmental Indicators Project Collaborative Memorandum](#)).

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](#). The State Water Board website has additional information related to [enforcement](#) and [supplemental environmental projects](#).

Fiscal Year 2026/27 Enforcement Priorities

Like previous years, our enforcement priorities for FY 2026/27 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:

- 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 our Office of Enforcement liaisons.

Potential enforcement cases are typically suggested by program staff and come from notifications we receive through our complaint hotline, the CalEPA Complaint System, State Office of Emergency Services spill reports, and 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.

Supplemental and Enhanced Compliance Projects

For administrative civil liability cases resolved through settlement, we encourage dischargers to consider offsetting a portion of the monetary penalty for a project that will benefit water quality. Up to 50 percent of a liability may be used to complete a supplemental or enhanced compliance project in accordance with the [Supplemental Environmental Project Policy](#). While it is up to the discharger to decide whether to include a project, enforcement staff promote the option and will assist with the selection process. We discussed available options with our reporting on the [Martinez Refining Company projects](#).

During FY 2025/26, projects included supplemental and environmental projects developed by dischargers and funding for [regional monitoring program](#) projects and for trash cleanup projects through Kids for the Bay's [Watershed Rangers Program](#) (Tables above). Some of the projects targeted funding for disadvantaged communities, which allows more than 50 percent of the liability to be used for a project. With this Supplemental Environmental Project Policy exception, over \$5.5 million will be spent on infrastructure improvements that improve water quality.