

Exhibit A

NOTICE OF VIOLATION SUBJECT TO MANDATORY MINIMUM PENALTIES SAN ELIJO OCEAN OUTFALL

For the purposes of Water Code sections 13385, a single operational upset (SOU) that leads to simultaneous violations of more than one pollutant parameter shall be treated as a single violation [Water Code section 13385(f)(1)]. For the purposes of subdivisions 13385(h) and (i), an SOU in a wastewater treatment unit that treats wastewater using a biological treatment process shall be treated as a single violation, even if the operational upset results in violations of more than one effluent limitation and the violations continue for a period of more than one day, if all the criteria at Water Code sections 13385(f)(2)(A)(i) and (ii) apply [Water Code section 13385(f)(2)(A)]. Water Code section 13385(f)(2)(A) only applies to violations that occur during a period for which the regional board has determined that violations are unavoidable, but in no case may that period exceed 30 days [Water Code section 13385(f)(2)(B)].

The following table lists effluent exceedances that occurred during the month of January 2017. The San Elijo Joint Powers Authority (SEJPA or Permittee) has reported that the effluent exceedances occurred as a result of an SOU and has met all of the conditions for an SOU pursuant to Water Code section 13385(f). For additional information about the effluent exceedances listed in the table:

1. Refer to the State Water Resources Control Board Public Reports webpage:
http://www.waterboards.ca.gov/water_issues/programs/ciwqs/publicreports.shtml;
2. Choose the "MMP Report" link located under the "Violations Reports" category; and
3. Enter the search criteria.

An SOU lead to the following simultaneous violations for a period of more than one day.
Per Water Code section 13385(f), an SOU shall be treated as a single violation.

Violation ID	Occurred Date	Violation Type	MMP Type	Violation Description	Facility Name
1021064	01/21/2017	CAT1	SOU	Settleable Solids Weekly Average (Mean) limit is 1.5 ml/L and reported value was 13.5 ml/L at EFF-001.	San Elijo Water Reclamation Facility
1021065	01/20/2017	CAT1	SOU	Settleable Solids Instantaneous Maximum limit is 3.0 ml/L and reported value was 40 ml/L at EFF-001.	San Elijo Water Reclamation Facility
1021066	01/27/2017	CAT1	SOU	Total Suspended Solids (TSS) Weekly Average (Mean) limit is 45 mg/L and reported value was 71.8 mg/L at EFF-001.	San Elijo Water Reclamation Facility
1021067	01/27/2017	CAT1	SOU	Settleable Solids Instantaneous Maximum limit is 3.0 ml/L and reported value was 6 ml/L at EFF-001.	San Elijo Water Reclamation Facility
1021068	01/19/2017	CAT1	SOU	Settleable Solids Instantaneous Maximum limit is 3.0 ml/L and reported value was 34 ml/L at EFF-001.	San Elijo Water Reclamation Facility
1021069	01/27/2017	CAT1	SOU	Settleable Solids 30-Day Average limit is 1 ml/L and reported value was 3.3 ml/L at EFF-001.	San Elijo Water Reclamation Facility

EXPEDITED PAYMENT AMOUNT

Mandatory Minimum Penalty Amount for Effluent Limit Violations

1 Serious Violation × \$3,000 per Serious Violation = \$3,000 Expedited Payment Amount

DEFINITIONS

AM	Effluent exceeds average monthly limitation.
ATOX	Violation of an acute toxicity effluent limitation.
AW	Effluent exceeds average weekly limitation.
CAT1	Violation of an effluent limitation for a Group I pollutant by more than 40%.
CAT2	Violation of an effluent limitation for a Group II pollutant by more than 20%.
CHRON	Chronic violation as defined by Water Code section 13385 (i). To be counted as a chronic violation, there must be 3 preceding violations within a 180-day period. The fourth non-serious violation that occurs within the 180 period is an MMP violation.
CIWQS	California Integrated Water Quality System database.
CTOX	Violation of a chronic toxicity effluent limitation.
DM	Effluent exceeds daily maximum limitation.
DREP	Deficient reporting violation. This will only result in an MMP if the report is so deficient as to make determination of compliance impossible for that reporting period.
GROUP	The list of pollutants is based on Appendix A to section 123.45 of title 40 of the Code of Federal Regulations.
IM	Effluent exceeds instantaneous maximum limitation.
LREP	Late reporting violation. Every 30 days a report is late counts as one late reporting violation.
M	Effluent exceeds limit for monthly reporting period.
MMP Type	Classification of the type of MMP violation.
Occurrence Date	Date that a violation actually occurred. For continuing violations, such as a monthly average, the last day of the reporting period is used. If the occurrence date is unknown, the date is entered as the day it was first discovered by staff, the discharger, or a third party. For deficient or late reports, the occurrence date is the day after the report was due.
OEV	Violation of any constituent-specific effluent limitation not included in Group I or Group II.
Q	Effluent exceeds limit for quarterly reporting period.
S	Effluent exceeds limit for semi-annual reporting period.
SOU	Single Operational Upset pursuant to Water Code sections 13385(f)
SIG	Serious violation as defined by Water Code section 13385 (h). Waste discharge exceeds the effluent limitation for a Group I pollutant by 40% or more (CAT1), or a Group II pollutant by 20% or more (CAT2). Also defined by Water Code section 13385.1 as a failure to file a discharge monitoring report pursuant to Water Code section 13383 for each period of 30 days following the deadline for submitting the report, if the report is designed to ensure compliance with limitations contained in waste discharge requirements that contain effluent limitations.
Violation Description	Narrative description of the violation.
Violation ID	Identification number assigned to a violation in CIWQS.
Violation Type	Classification of a violation. Two types of violations relate to MMPs: 1) Late Reporting Violations (LREP, DREP) 2) Effluent Violations (ATOX, CTOX, CAT1, CAT2, OEV)