DOCUMENT RECEIPT

Type of Document: Expedited Payment Letter dated March 6, 2018

Printed Name: Violette Dimitry

Signature: 

Title:  

Date: 4/10/18
March 6, 2018

Mr. Metropolitan Serapion
Saint Justina Coptic Orthodox Church, Inc.
3803 West Mission Boulevard
Pomona, California 91766
(Certified Mail)

Mr. John Mikhail
frjohnmm@aol.com
(By Email Only)

Mr. John Mikhail
Saint Justina Coptic Orthodox Church, Inc.
6386 Sapphire Street
Rancho Cucamonga, California
frjohnmm@aol.com
(Regular Mail and Email)

SETTLEMENT OFFER NO. R8-2018-0064: EXPEDITED PAYMENT PROGRAM FOR VIOLATION OF WATER CODE SECTION 13399.33(C). WDID NO. 8 36C371293

Dear Mr. Mikhail,

This letter is to notify Saint Justina Coptic Orthodox Church, Inc. (hereinafter "Permittee or "you") of alleged violations of the California Water Code (Water Code). The violation is a failure to submit the 2016-17 Annual Report by September 1, 2017 for the St Justina Coptic Orthodox Church construction site located at 6386 Sapphire Street in the City of Rancho Cucamonga (Site).

This is an invitation to participate in the Santa Ana Regional Water Quality Control Board's (Regional Board) Expedited Payment Program to address mandatory minimum penalties that must be assessed pursuant to California Water Code sections 13385 and 13385.1.

ALLEGED VIOLATION:

Regional Board staff alleges that the Permittee has violated provisions of the National Pollutant Discharge Elimination System (NPDES) Statewide General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities, Order No. 2009-0009-DWQ as amended by 2010-0014-DWQ and 2012-0006-DWQ (Order).
Provision I.4.c. of the Order requires that the Permittee submit an Annual Report, due to the Regional Board by September 1 of each year.

Regional Board staff requested that the Permittee submit the 2016-17 Annual Report in the Notices of Noncompliance (NNC) issued on September 12, 2017 and October 18, 2017. Based on information in the Storm Water Multiple Application & Report Tracking System (SMARTS), as of March 1, 2018, the Annual Report was submitted on 12/15/2017.

Pursuant to Water Code section 13399.33(c), the Permittee is subject to a minimum penalty of not less than one thousand dollars ($1,000) plus staff costs for failing to submit the Annual Report within sixty (60) days after the first NNC was sent. The Permittee is also subject to discretionary administrative civil liabilities of up to ten thousand dollars ($10,000) for each day in which the violation occurs. These minimum and discretionary administrative civil liabilities may be assessed by the Regional Board beginning with the date that the violations first occurred. The formal enforcement action that the Regional Board uses to assess such liability is an administrative civil liability complaint. The Regional Board may instead refer such matters to the Attorney General's Office for prosecution. If referred to the Attorney General for prosecution, the Superior Court may assess up to twenty-five thousand dollars ($25,000) per violation.

PERMITTEE’S OPTIONS FOR RESPONSE TO OFFER:

You have two options to respond as outlined below.

1. **Accept the Expedited Payment Program offer.** If the permittee chooses to accept this offer, they must agree to pay a settlement of $1,890.00. This settlement offer is based on Water Code section 13399.33(c) which requires $1,000 per missing report plus staff costs. Staff costs in this matter are $890.00.

   This is a Conditional Offer subject to certain terms and conditions set forth below. If you choose this option, **you must sign and submit the enclosed Acceptance and Waiver form by April 6, 2018.** The form provides submittal instructions. Final closure on this action is only possible after ultimate submission of the settlement amount.

   Please submit an original signed (blue ink) Acceptance and Waiver form to:

   Keith Elliott, Inland Stormwater Unit  
   Santa Ana Regional Water Quality Control Board  
   3737 Main Street, Suite 500  
   Riverside, CA 92501-3348

   In response to the Conditional Offer and payment in settlement of this enforcement action, the Regional Board will forego issuance of a formal administrative complaint,
will not refer the violation to the Attorney General, and will waive its right to seek additional discretionary civil liabilities for the violations identified in the NNCs.

2. **Contest the violation.** To contest the violation, the Permittee must submit in writing the basis of your challenge with supporting evidence. For example, you may have evidence that you previously submitted your Annual Report(s) prior to September 1, 2017 or you are no longer in business. If you choose this option, you must submit your written documentation by April 6, 2018. We will review your submission and, if we agree, we will notify you in writing that you are no longer considered in violation of the permit and that our enforcement action has been withdrawn. All responses should be directed to Keith Elliott at the address listed in the above paragraph.

If you do not respond in a manner described in the above options, Regional Board staff will prepare an administrative civil liability complaint for the violations cited in the NNC. The liability amount sought in the administrative civil liability complaint and/or imposed by the Regional Board may be higher than the liability amount set forth in this Conditional Offer. Moreover, additional staff costs may be considered in the recommended liability amount in an administrative civil liability complaint.

**CONDITIONS FOR REGIONAL BOARD ACCEPTANCE OF RESOLUTION:**

Federal regulations require the Regional Board to publish notice of, and to provide at least thirty (30) days for public comment on, any settlement of an enforcement action addressing NPDES permit violations (40 C.F.R. section 123.27(d)(2)(iii)).

If you accept the Expedited Payment Program offer, the settlement will be published in the following manner:

1. Upon receipt of the Permittee’s Acceptance and Waiver, the Annual Reports, and other requested technical reports on or before April 6, 2018, Regional Board staff will publish a notice of the proposed resolution of the alleged violations.

2. If Regional Board staff receives no comments within the notice period, the Regional Board Executive Officer will execute the Acceptance and Waiver as a stipulated order assessing the uncontested penalty amount pursuant to Water Code section 13399.33. You will then be notified that payment is due within 30 days. Failure to pay the penalty within that time frame may result in further liability, referral of the matter to the Attorney General, and/or may void the offer to participate in this Expedited Payment Program.

3. If Regional Board staff receives significant comments in opposition to the settlement, this offer may be withdrawn. In that case, the Permittee’s waiver pursuant to the Acceptance and Waiver will also be treated as withdrawn. In that case, the violations will be addressed through a formal enforcement action.
This Expedited Payment Program offer does not address or resolve liability for any violation that is not specifically identified in the attached NNC. The Regional Board reserves the right to pursue formal enforcement of any violations not specifically cited in the attached NNCs.

Should you have any questions about this Expedited Payment Program or Notice of Noncompliance, please contact Keith Elliott at (951) 782-4925 or at keith.elliott@waterboards.ca.gov regarding this matter.

Sincerely,

Jayne Joy
Assistant Executive Officer

Enclosures:
- Notice of Noncompliance dated September 12, 2017
- Notice of Noncompliance dated October 18, 2017
- Acceptance of Conditional Resolution and Waiver of Right to Hearing

cc: (via email)

Catherine Hawe, Office of Enforcement, State Water Resources Control Board
1st Notice of Noncompliance
NOTICE OF NON-COMPLIANCE: FAILURE TO COMPLY WITH THE GENERAL PERMIT FOR STORM WATER DISCHARGES ASSOCIATED WITH CONSTRUCTION AND LAND DISTURBANCE ACTIVITIES, ORDER NO. 2009-0009-DWQ, NPDES NO. CAS000002 (GENERAL PERMIT) WDID NO. 8 36C371293

Dear Mr. Mikhail:

Your construction site identified as St Justina Coptic Orthodox Church, located at 6386 Sapphire Street, in the city of Rancho Cucamonga is regulated under the General Permit and is identified by WDID 8 36C371293. Section XVI.A. of the General Permit requires that an Annual Report be submitted by September 1st each year via the online SMARTS database. Our records show that your annual report for the July 1, 2016 to June 30, 2017 reporting period has not been submitted.

saint justina coptic orthodox church is consequently in violation of Section XVI.A. of the General Permit for failure to submit a complete 2016-2017 Annual Report. We request that you submit a complete 2016-2017 Annual Report via the online SMARTS database no later than October 13, 2017.

The online SMARTS database is available at:

https://smarts.waterboards.ca.gov

Please note that in order to submit the annual report, the Legally Responsible Person (LRP) or the legal owner of the property must complete the e-Authorization Form if the e-Authorization Form was not processed in the prior years. This form can be accessed, once logged into SMARTS, under the main menu. Click on the “Update User Profile” link on the left. The LRP must complete the form shown, sign it, and mail the original form to one of the Sacramento addresses noted at the end of the e-Authorization Form. You will be notified when the e-Authorization Form has been processed, enabling you to submit the report electronically.

You must also provide a statement explaining why the annual report was not submitted by the September 1 deadline, propose the measures you will take to ensure timely
Failure to submit the requested information within 30 days of the date of this letter will result in further enforcement action, which may include civil monetary penalties of up to $10,000 for each day of violation. Please note that Section 13399.33 of the California Water Code stipulates a mandatory minimum penalty of $1,000 to those permittees that do not submit their annual reports after notification.

Should you need assistance in completing the Annual Report or have any questions relating to SMARTS, please contact the SMARTS Helpdesk at stormwater@waterboards.ca.gov. You may also contact Keith Elliott at 951-782-4925 or keith.elliott@waterboards.ca.gov.

Sincerely,

[Signature]

Ann Sturdivant, PG, CEG, CHG
Supervising Engineering Geologist
Chief, Groundwater and Regulatory Division
U.S. Postal Service  
CERTIFIED MAIL RECEIPT  
Domestic Mail Only

OFFICIAL USE

Certified Mail Fee $3.30

Extra Services & Fees (check box, add fee)

Return Receipt Requested $0.70
Return Receipt Electronic $0
Certified Mail Restricted Delivery $0
Adult Signature Required $0
Adult Signature Restricted Delivery $0

Postage $0.47

Total Postage and Fees $6.47

Postmark Here
1st NNC

Sent To

Mr. John Mikhail
Saint Justin Coptic Orthodox Church
5306 Sapphire Street
Banning Cucamonga, CA 91701

04/22/2017
Certified Mail service provides the following benefits:

- A receipt (this portion of the Certified Mail label).
- A unique identifier for your mailing.
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- For an additional fee, and with a proper endorsement on the envelope, you may request the following services:
  - Return receipt service, which provides a record of delivery (including the recipient's signature). You can request a barcoded return receipt or an electronic version. For a barcoded return receipt, complete PS Form 5811, Domestic Return Receipt, and attach it to your mailing;

For an electronic return receipt, use a retail associate for assistance. To receive a duplicate return receipt by an additional fee, present the USPS®-postmarked Certified Mail receipt to the retail associate.

- Restricted delivery service, which provides delivery to the addressee specified by name, or to the addressee's authorized agent.
- Adult signature service, which requires the signature to be at least 21 years of age (not available at retail).
- Adult signature restricted delivery service, which requires the signature to be at least 21 years of age and provides delivery to the addressee specified by name, or to the addressee's authorized agent (not available at retail).

To ensure that your Certified Mail receipt is accepted as legal proof of mailing, it should bear a USPS postmark. If you would like a postmark on this Certified Mail receipt, please present your Certified Mail item at a Post Office® for postmarking. If you don't need a postmark on this Certified Mail receipt, tear the barcoded portion of the label, slide it to the mailing, apply appropriate postage, and deposit the mailing.

IMPORTANT: Save this receipt for your records.
1. Article Addressed to:
   Mr. John Mikhail
   Saint Justina Coptic Orthodox Church
   6386 Sapphire Street
   Rancho Cucamonga, CA 91701
   WDID: 8 36C371293  AppID: 450387
   9/12/2017

2. Article Number (Transfer from service label)
   7016 2070 0000 6806 1558

PS Form 3811, July 2016 PSN 7530-02-000-9053
Domestic Return Receipt

SENDERS: COMPLETE THIS SECTION

- Complete Items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

COMPLETE THIS SECTION ON DELIVERY

A. Signature

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from Item 1? □ Yes □ No
   If YES, enter delivery address below:

3. Service Type
   □ Adult Signature
   □ Adult Signature Restricted Delivery
   □ Certified Mail®
   □ Certified Mail Restricted Delivery
   □ Collect on Delivery
   □ Collect on Delivery Restricted Delivery
   □ Restricted Delivery

4. Additional Information

5. Signature Confirmation

6. Signature Confirmation"
UNITED STATES POSTAL SERVICE

SANTA ANA REGIONAL
WATER QUALITY CONTROL BOARD
3737 MAIN STREET, SUITE 500
RIVERSIDE, CA 92501-3348

ATTN: INLAND STORM WATER
2016-2017 Construction General Permit
1st NNC (KLE)
2nd Notice of Noncompliance
Mr. John Mikhail
Saint Justina Coptic Orthodox Church
6386 Sapphire Street
Rancho Cucamonga, CA 91701

FINAL NOTICE OF NON-COMPLIANCE - GENERAL PERMIT FOR STORM WATER DISCHARGES ASSOCIATED WITH CONSTRUCTION AND LAND DISTURBANCE ACTIVITIES, ORDER NO. 2009-0009-DWQ, NPDES NO. CAS000002

Dear Mr. Mikhail:

The construction site identified as Saint Justina Coptic Orthodox Church, located at 6386 Sapphire Street, in the city of Rancho Cucamonga is regulated under the General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (General Permit) and is identified by 8 36C371293.

Section XVI.A. of the General Permit requires that an Annual Report be submitted by September 1st each year via the online SMARTS database. Our records show that your annual report for the July 1, 2016 to June 30, 2017 reporting period has not been submitted.

Saint Justina Coptic Orthodox Church is consequently in violation of Section XVI.A. of the General Permit for failure to submit a complete 2016-2017 Annual Report. We request that you submit a complete 2016-2017 Annual Report via the online SMARTS database no later than November 13, 2017.

The online SMARTS database is available at https://smarts.waterboards.ca.gov.

Please note that in order to submit the annual report, the Legally Responsible Person (LRP) or the legal owner of the property must complete the e-Authorization Form if the e-Authorization Form was not processed in the prior years. This form can be accessed, once logged into SMARTS, under the main menu. Click on the “Update User Profile” link on the left. The LRP must complete the form shown, sign it, and mail the original form to one of the Sacramento addresses noted at the end of the e-Authorization Form. You will be notified when the e-Authorization Form has been processed, enabling you to submit the report electronically.

You must also provide a statement explaining why the annual report was not submitted by the September 1 deadline, describe the measures you will take to ensure timely...
submittals in the future, and upload the statement as part of SMARTS annual report Attachments.

Failure to submit the requested information by November 13, 2017, will result in further enforcement action, which may include civil monetary penalties of up to $10,000 for each day of violation. Please note that Section 13399.33 of the California Water Code stipulates a mandatory minimum penalty of $1,000 to those permittees who do not submit their annual reports after notification.

Should you need assistance in completing the Annual Report or have any questions relating to SMARTS, please contact the SMARTS Helpdesk at stormwater@waterboards.ca.gov. You may also contact Keith Elliott at 951-782-4925 or keith.elliott@waterboards.ca.gov.

Sincerely,

Original Signed by:

Lauma Willis
Environmental Program Manager
Chief, Planning Division
Santa Ana Regional Water Quality Control Board
1. Article Addressed to:
   Mr. John Mikhail
   Saint Justina Coptic Orthodox Church
   6386 Sapphire Street
   Rancho Cucamonga, CA 91701
   WDID: 836C371293  AppID: 450387
   10/16/2017

2. Service Type
   □ Adult Signature
   □ Adult Signature Restricted Delivery
   □ Certified Mail
   □ Certified Mail Restricted Delivery
   □ Collect on Delivery
   □ Collect on Delivery Restricted Delivery
   □ Insured Mail
   □ Insured Mail Restricted Delivery
   □ Priority Mail Express®
   □ Registered Mail™
   □ Registered Mail Restricted Delivery
   □ Return Receipt for Merchandise
   □ Signature Confirmation™
   □ Signature Confirmation Restricted Delivery
   □ Certified Mail
   □ Certified Mail Restricted Delivery

3. Yes
   If YES, enter delivery address below:

   □ No

4. D. Is delivery address different from Item 1?
   □ Yes
   □ No

5. E. Delivery address:

   □ F. Delivery instructions:

6. G. Payment:

   □ H. Insured Mail:

   □ I. Certification and Collection:

   □ J. Delivery Instructions:

   □ K. Signature Confirmation:

   □ L. Restricted Delivery:

   □ M. Delivery Instructions:

   □ N. Certification:

   □ O. Payment Method:

   □ P. Certificate of Delivery:

   □ Q. Collection:

   □ R. Delivery Instructions:

   □ S. Certificate of Delivery:

   □ T. Payment Method:

   □ U. Certificate of Delivery:

   □ V. Payment Method:

   □ W. Certificate of Delivery:

   □ X. Payment Method:

   □ Y. Certificate of Delivery:

   □ Z. Payment Method:
UNITED STATES POSTAL SERVICE

SANTA ANA REGIONAL WATER QUALITY CONTROL BOARD
3737 MAIN STREET, SUITE 500
RIVERSIDE, CA 92501-3348

ATTN: INLAND STORM WATER
2016-2017 Construction General Permit
2nd NNC (KLE)
Waiver
ACCEPTANCE OF CONDITIONAL RESOLUTION
AND WAIVER OF RIGHT TO HEARING: (Proposed) ORDER

Saint Justina Coptic Orthodox Church, Inc.
Settlement Offer No. RS-2018-0064
WDID No. 8 36C371293

By signing below and returning this Acceptance of Conditional Resolution and Waiver of Right to Hearing (Acceptance and Waiver) to the Santa Ana Regional Water Quality Control Board (Regional Board), Saint Justina Coptic Orthodox Church, Inc. (Permittee) hereby accepts the "Offer to Participate in Expedited Payment Program" and waives the right to a hearing before the Regional Board to dispute the violations described in the Notices of Noncompliance (NNC) which are attached and incorporated herein by reference.

The Permittee agrees that the Expedited Payment Program Offer shall serve as a complaint pursuant to Article 2.5 of the California Water Code and that no separate complaint is required for the Regional Board to assert jurisdiction over the alleged violations through its Chief Prosecutor. The Permittee agrees to pay the administrative civil liability authorized by California Water Code section 13399.30, in the sum of $1,890.00 (Expedited Payment Amount) which shall be deemed payment in full of any civil liability pursuant to California Water Code section 13399.30 that otherwise might be assessed for the violations described in the NNCs.

The Permittee understands that this Acceptance and Waiver waives its right to contest the allegations in the NNCs and the amount of civil liability for such violations. The Permittee understands that this Acceptance and Waiver does not address or resolve liability for any violation that is not specifically identified in the NNCs.

Upon execution by the Permittee, the completed Acceptance and Waiver shall be returned to:

Keith Elliott, Inland Stormwater Unit
Expedited Payment Program
Santa Ana Regional Water Quality Control Board
3737 Main Street, Suite 500
Riverside, California 92501

The Permittee understands that federal regulations set forth at title 40, Code of Federal Regulations, section 123.27(d)(2)(iii) require the Regional Board to publish notice of and provide at least thirty (30) days for public comment on any proposed resolution of an enforcement action addressing NPDES permit violations. Accordingly, this Acceptance and Waiver, prior to execution by the Regional Board Executive Officer, will be published as required by law for public comment.

If no comments are received within the notice period that causes the Regional Board Executive Officer to question the Expedited Payment Amount, the Regional Board Executive Officer will execute the Acceptance and Waiver.

The Permittee understands that if significant comments are received in opposition to the Expedited Payment Amount, the offer on behalf of the Regional Board to resolve the violations
Settlement Offer No. RB-2018-0064  
WDID No. 8 36C371293

set forth in the NOVs may be withdrawn. In that circumstance, the Permittee will be advised of that withdrawal, and an administrative civil liability complaint may be issued and the matter may be set for a hearing before the Regional Board. In the event that this matter proceeds to hearing, the Permittee understands that this Acceptance and Waiver executed by the Permittee will be treated as a settlement communication and will not be used as evidence in that hearing.

The Permittee further understands that once this Acceptance and Waiver is executed by the Regional Board Executive Officer, the full payment required by the deadline set forth below is a condition of this Acceptance and Waiver. In accordance with California Water Code section 13399.37(a), funds collected for violations pursuant to sections 13399.33(c) and 13399.33(d) shall be deposited in the Waste Discharge Permit Fund. Accordingly, the $1,890.00 liability including staff costs shall be paid by a cashier's or certified check made out to the "State Water Resources Control Board" referencing this Order number for deposit into the Waste Discharge Permit Fund. The payment must be submitted to the State Water Resources Control Board no later than thirty (30) calendar days after the date the Acceptance and Waiver is executed by the Regional Board Executive Officer.

Please mail check(s) to:

State Water Resources Control Board  
Re: Order No. RB-2018-0064  
Division of Administrative Services, Accounting Branch  
1001 I Street, 16th Floor, 95814  
P.O. Box 1888  
Sacramento, California 95812-1888

I hereby affirm that I am duly authorized to act on behalf of and to bind the Permittee in the making and giving of this Acceptance and Waiver.

Saint Justina Coptic Orthodox Church, Inc.

By:  
(Signed Name)  
Fr. John Mikhail  
(Printed or Typed name)  

4/25/18  
(Date)  
Priest of the church  
(Title)

IT IS SO ORDERED PURSUANT TO CALIFORNIA WATER CODE SECTION 13399.30

Date: 

By: 
Hope Smythe  
Executive Officer
Santa Ana Regional Water Quality Control Board
Attorney Keith L. Elliott
3737 Main Street, Suite 500
Riverside, CA 92501

ST JUSTINA COPTIC ORTHODOX CHURCH
PO BOX 187
RANCHO CUCAMONGA, CA 91739-0187

DATE 4/25/2018

PAY TO THE ORDER OF: State Water Resources Control Board

Six Thousand Thirty Dollars ($6,303)

Bank of America

Cust. No.

James

RCH 2018 0064

#00.41624 122000358 001173411904

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Certified Mail Fee $3.30
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- Certified Mail Restricted Delivery $0
- Adult Signature Required $0
- Adult Signature Required Delivery $0
Total Postage and Fees $6.47

Sent To
Mr. Metropolitan Serapion
Saint Justin Coptic Orthodox Church, Inc.
3603 West Mission Boulevard
Pomona, CA 91766

Postmark Here

03/05/2016

See Reverse for Instructions
Your item was delivered to an individual at the address at 3:58 pm on March 9, 2018 in POMONA, CA 91766.

☑ Delivered
March 9, 2018 at 3:58 pm
Delivered, Left with Individual
POMONA, CA 91766

Get Updates

Text & Email Updates

Tracking History

March 9, 2018, 3:58 pm
Delivered, Left with Individual
POMONA, CA 91766
Your item was delivered to an individual at the address at 3:58 pm on March 9, 2018 in POMONA, CA 91766.

March 9, 2018
In Transit to Next Facility

March 8, 2018
In Transit to Next Facility

How can I help you?
March 7, 2018
In Transit to Next Facility

March 6, 2018, 11:05 pm
Departed USPS Regional Facility
SAN BERNARDINO CA DISTRIBUTION CENTER

March 6, 2018, 7:12 pm
Arrived at USPS Regional Origin Facility
SAN BERNARDINO CA DISTRIBUTION CENTER

March 6, 2018, 5:35 pm
USPS in possession of item
RIVERSIDE, CA 92501

Product Information

Can’t find what you’re looking for?
Go to our FAQs section to find answers to your tracking questions.

FAQs (http://faq.usps.com/?articleId=220900)

How can I help you?
The easiest tracking number is the one you don't have to know.

With Informed Delivery®, you never have to type in another tracking number. Sign up to:

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- Automatically track the packages you're expecting.
- Set up email and text alerts so you don’t need to enter tracking numbers.
- Enter USPS Delivery Instructions™ for your mail carrier.

Sign Up

(https://reg.usps.com/entreg/RegistrationAction_input)

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