



California Environmental Protection Agency



**- DRAFT –
ENFORCEMENT REPORT**

[Per California Water Code Chapter 5.5 Section 13385(o)]

January 2008

Table of Contents

Executive Summary	3
Introduction	5
(A) A compilation of the number of violations of waste discharge requirements in the previous year.....	10
(B) A record of the formal and informal compliance and enforcement actions taken for each violation.	17
(C) An analysis of the effectiveness of current policies, including mandatory minimum penalties (MMPs).	20

List of Figures

Figure 1: MMP violations per year since 2000.	23
Figure 2: NPDES Effluent Violations 2000 to 2007	24
Figure 3: Overall NPDES Violations 2000 to 2007	24

List of Tables

Table 1: NPDES Wastewater Permits by Category and Regional Office	10
Table 2: Number of Violations of NPDES Wastewater Permits 2000 to 2007	11
Table 3: Number of Violations Per Wastewater Facility for 2007	11
Table 4: NPDES Wastewater Violations by Category for 2007	12
Table 5: NPDES Stormwater Permittees by Permit Type and Regional Office	14
Table 6: Number of Violations of NPDES Stormwater Permits 2000 to 2007.....	15
Table 7: NPDES Stormwater Violations by Category for 2007	15
Table 8: NPDES Wastewater Violations Compared to Completed Enforcement Actions	17
Table 9: Percentage of NPDES Wastewater Violations With A Completed Enforcement Action.	18
Table 10: NPDES Stormwater Violations Compared to Completed Enforcement Actions	19
Table 11: Status of Effluent Violations Subject to MMPs From January 2000 to December 2007.....	21
Table 12: Facilities With MMP Effluent Violations and Pending Enforcement Actions January 2000 to December 2007	22

Appendices

Appendix A: List of California Regional Water Quality Control Boards Offices
Appendix B: Listing and Descriptions of Violation Types Used in the CIWQS Data System
Appendix C: Types and Classification of Enforcement Actions
Appendix D: List of Facilities with Effluent Violations Subject to MMP Actions

**State Water Boards
Enforcement Report
[Per California Water Code Chapter 5.5 Section 13385(o)]**

This State Water Boards report provides the information directed by Chapter 5.5 Section 13385(o) of the California Water Code, responding to the following provision:

13385 Civil Liability

(o): The state board shall continuously report and update information on its Web site, but at a minimum, annually on or before January 1, regarding its enforcement activities. The information shall include all of the following:

(A) A compilation of the number of violations of waste discharge requirements in the previous calendar year, including stormwater enforcement violations.

(B) A record of the formal and informal compliance and enforcement actions taken for each violation, including stormwater enforcement actions

(C) An analysis of the effectiveness of current enforcement policies, including mandatory minimum penalties.

As directed by this statute, the report is available at the Water Board's website at <http://www.waterboards.ca.gov> .

Executive Summary

This report summarizes information regarding violations of waste discharge requirements and enforcement actions taken by the Regional Water Quality Control Boards (Regional Water Boards) in response to those violations. The report addresses only discharges to surface water because it has been prepared pursuant to Chapter 5.5 of the California Water Code. Chapter 5.5 implements provisions of the Federal Water Pollution Control Act and establishes a regulatory program for discharges to surface water only. This report also contains analysis of program effectiveness and recommendations for improvement.

In addition, The State Water Resources Control Board and the Regional Water Boards (collectively Water Boards) are currently developing a Baseline Enforcement Report for all core regulatory programs. This more comprehensive report will look at violations, enforcement actions, staffing, proposed enforcement performance measures, and recommendations for program effectiveness. The Baseline Enforcement Report will also address the additional enforcement reporting requirements in California Water Code Section 13225 (as amended by Senate Bill no. 729 (2005-2006 Regular Session)).

The Water Boards use the California Integrated Water Quality System (CIWQS) database to track violations and the resulting enforcement actions. The CIWQS

database contains information on violations and enforcement actions that have occurred since July 1, 1999.

Most of the tables presented in this report are now available for continuous public use via the State Water Board's Internet site. Use of live, public reports allows the public access to violation and enforcement data from all dischargers regulated by the Water Boards, and gives the user control over how to sort and filter this data to meet specific information needs.

The Water Board's currently available public reports can be found on the Water Board's public website at:

<http://www.waterboards.ca.gov/ciwqs/publicreports.html>

The major findings of this report are:

- (1) The Water Boards regulate over 2,200 National Pollutant Discharge Elimination System (NPDES) wastewater permittees, and nearly 30,000 stormwater permittees statewide.
- (2) The total number of violations at NPDES wastewater facilities and the number of effluent violations has fluctuated since 2000 with no overall trends up or down.
- (3) The percentage of violations with a completed enforcement action has declined during the past four years (some of these violations may not warrant enforcement).
- (4) A backlog of mandatory minimum penalties (MMPs) exists, representing a substantial pending workload.
- (5) Transition to a new data system in mid-2005 has affected collection and reporting of data on violations and enforcement actions.

These findings are based on analysis of the data from the CIWQS database as presented in this report.

The Water Boards are undertaking the following actions to address the findings in this report:

- (a) Standardization for efficient processing of permits and MMPs; return saved resources to compliance work,
- (b) Continued development of electronic submittal of compliance information from dischargers to provide dischargers and state staff greater efficiencies and enable more state resources to be devoted to compliance,
- (c) Continue work on improved public reporting of violation and enforcement information, including development and public reporting of enforcement performance measures on the Internet,
- (d) Explore improved prioritization of enforcement efforts,
- (e) Issuance of an annual enforcement report covering all Water Board programs (the Baseline Enforcement Report referenced earlier),
- (f) Assess compliance at federal facilities and discuss findings and appropriate next steps with USEPA.

Introduction

This report addresses violations of Waste Discharge Requirements for discharges to surface water. Discharges to surface water are issued a combined Waste Discharge Requirements/NPDES permit. The NPDES program is administered by California in accordance with the United States Environmental Protection Agency's approval, and is implemented through Chapter 5.5 of the California Water Code. NPDES Waste Discharge Requirements are usually issued by one of the nine Regional Water Boards. These nine Regional Water Boards and their twelve regional offices lie within different watersheds and are as follows (see Appendix A for map and details):

- Region 1 – North Coast Water Board
- Region 2 – San Francisco Bay Water Board
- Region 3 – Central Coast Water Board
- Region 4 – Los Angeles Water Board
- Region 5 – Central Valley Water Board (With Offices in Redding [5R], Sacramento [5S] and Fresno [5F])
- Region 6 – Lahontan Water Board (With offices in South Lake Tahoe [6A] and Victorville [6B])
- Region 7 – Colorado River Basin Water Board
- Region 8 – Santa Ana Water Board
- Region 9 – San Diego Water Board

Three overarching considerations are pertinent to this report: the reporting period, federal facilities, small and disadvantaged communities, and data quality.

Reporting Period

This report addresses violations and enforcement actions recorded in CIWQS for calendar year 2007. Additionally, historical information for prior years is included for comparison purposes. Typically, it takes approximately six months to issue an enforcement action after the violation has occurred; it may take substantially longer for more complex cases, or where staff has been assigned to higher priorities. Also, self-monitoring reports are typically due to the Regional Water Boards 30 to 45 days after the end of the month for which the monitoring was done. This allows time for laboratory analysis and transmittal of data. As a result, Regional Water Board staff is not routinely aware of violations for several months after they occur. Staff must review the reports, identify the violations and manually enter the information into the data system. Where a large enforcement action is warranted to address a minor but chronic problem, it could be several years before a specific violation is linked in the database to a specific enforcement action.

The required reporting date for this report is January 1 for reporting on the preceding calendar year. As noted above it may be several months or more before violations are noted and enforcement actions taken. The data in this report reflects this lag. In particular, data for 2007 in the following tables and charts is incomplete due to this reporting, review and recording lag. A significant amount of data for the last quarter of 2007 has not yet been entered.

It is important to note that the data presented in these reports continues to change as actions are taken and enforcement information is updated to reflect these actions. For example, in a report issued in August 2006 for data in 2005, the Regional Water Boards reported that only 14% of certain violations had resulted in an enforcement action. Data now indicate that 62% of these violations have resulted in an enforcement action.

Data for this current report was extracted from the CIWQS database December 3-7, 2007 and thus reflects information that was entered as of that date.

Federal Facilities

Federal facilities include any facilities owned or operated by the federal government. These include national parks, Department of Energy facilities, Department of the Defense (DOD) facilities, etc.

DOD facilities fall under one of the following three categories:

- Active bases where the military currently conducts operations,
- Base Realignment and Closure (BRAC) installations which are being cleaned up and prepared for transfer to communities and to other federal, state, and local agencies, and
- Formerly Used Defense Sites (FUDS) which are properties that DOD once owned, operated or leased.

State regulatory oversight is conducted at DOD facilities under a Cooperative Agreement (CA) between the State regulatory agencies (the Water Boards and the Department of Toxic Substances Control) and DOD. The CA includes a dispute resolution process based on an approach agreed to in a 1992 memorandum of agreement (MOA) between the DOD and the State Water Board. Enforcement actions against DOD facilities must first be negotiated pursuant to the dispute resolution procedures of the MOA. The MOA specifies three levels for dispute resolution, with the final level being the Governor and the Secretary of Defense. The MOA is interpreted by DOD to preclude State enforcement until the dispute resolution process has been fully exhausted without successful resolution. Only if the State and the Federal Government still disagree can the State pursue enforcement for these facilities. This effectively precludes enforcement actions against such facilities. In addition, federal facilities are shielded from most penalty actions by sovereign immunity.

CIWQS database information about federal facilities has become inconsistent and problematic because the Water Boards have found it difficult to prevail in enforcement against federal facilities. Consequently, Regional Water Board entry of violations at these facilities has declined. For example, San Diego Regional Water Board initially entered all identified violations at federal facilities into the database. The San Diego Regional Water Board discontinued this comprehensive recordation of federal facility violations because of their inability to enforce. Inclusion of this data in summary information about violations and related enforcement has a dramatic and misleading impact on the historic data. For that reason, this report does not include violations and

enforcement actions for federal facilities. To ensure the Water Boards are properly addressing violations, a separate assessment of such facilities should be done, and the findings discussed with USEPA. It is anticipated that future versions of this report will accurately report on the status of violations and enforcement at federal facilities.

Small and Disadvantaged Communities

Small and disadvantaged communities often face compliance issues related to their wastewater management systems. The Water Boards' challenge is to determine the proper mix of formal enforcement actions with other compliance measures such as financial, technical, and regulatory assistance to effectively address the water quality violations at facilities in these communities.

In California, small communities are generally defined as those communities with either: (1) less than 10,000 persons or within a rural county for wastewater enforcement purposes; or (2) less than 20,000 persons for financial assistance purposes. Due to their small rate base, small communities lack the economies of scale to build and maintain adequate wastewater systems. Small communities are commonly located in rural, sparsely-populated areas that require greater pipeline and pumping infrastructure. In addition, many small and/or rural communities are also disadvantaged (have an average household income of less than 80 percent of the statewide average).

Many small communities are currently on failing septic systems or have old and undersized wastewater treatment plants that can not meet current water quality standards. Such systems can cause significant health and safety problems, endanger surface water uses, and pose a threat to groundwater supplies. Small communities may lack the funds necessary to retain qualified operators. When their wastewater systems violate water quality requirements, they may be unable to come up with the capital to fix the problem or to pay the fines associated with non-compliance. In addition, many small disadvantaged communities lack the knowledge and resources necessary to effectively apply for grants and loans to help make wastewater projects more feasible. Even if communities are able to secure financial assistance, they often do not have the technical knowledge to determine the best project alternative or to appropriately plan for long-term operations and maintenance needs.

The Water Boards have formed a staff work group to learn more about the problems faced by small disadvantaged communities and to develop strategies to address those problems. In addition to these internal efforts, Water Board staff also have met with community-based nonprofit organizations to gain a better understanding of the current needs and issues of small and/or disadvantaged communities. These nonprofit organizations support small, rural, and disadvantaged communities with water and wastewater resource policy, planning, and management.

The staff working group will develop a *Small Community Wastewater Strategy* for public review and comment and consideration by the State Water Board. One of the strategies addressed will be the use of formal enforcement actions to deter non-compliance. It is anticipated that the *Water Boards' Small Community Wastewater*

Strategy will be an evolving strategy that will be re-evaluated and updated on an annual basis to incorporate new information and address emerging small community needs.

Data Quality

Data quality and completeness present an ongoing challenge, and data entry is inconsistent between Regional Water Boards and has been delayed in some. The primary reasons for these difficulties are the resource intensive manual review of paper monitoring reports and the subsequent manual data entry of violations, adjustment to a new data system, and the required reporting date for this report as noted above.

In July 2005, the Water Boards launched a new data system called the California Integrated Water Quality System (CIWQS). Initial deployment of this system occurred before the system was fully ready. Development of reporting functionality, development of business rules, and data migration continues. As such, inconsistencies and apparent deficiencies in the data presented in this report do not necessarily reflect inconsistencies in our enforcement program statewide. To address the question of data quality and the functioning of CIWQS, the State Water Board asked an independent panel of national experts to review CIWQS. This review was conducted in May 2006 and the review panel report had seven recommendations for improving CIWQS. The State Water Board has deployed a dedicated project team to implement the review panel's recommendations and improve the functioning of CIWQS. One of the projects undertaken is a QA/QC review to assess the quality of data in CIWQS by coordinating a data audit and establishing QA/QC protocols to assure that the quality of data remains high into the future. This CIWQS improvement effort is ongoing and should result in ongoing incremental improvement to the accuracy and timeliness of the violation and enforcement data in CIWQS.

The Water Boards have also recently developed a number of new public reports to meet our requirement to continuously provide the data contained in this report. The violation and enforcement reports now available at:

<http://www.waterboards.ca.gov/ciwqs/publicreports.html>

include the following:

- Interactive violation report by Regional Water Board or county
- Violations by year and Regional Water Board for 2000 thru 2007
- Interactive violations with linked enforcement actions
- Violations with linked enforcement actions by Regional Water Board for the years 2000 through 2007
- Enforcement actions listing
- Enforcement orders search of actual existing orders documents
- Mandatory minimum penalty report
- Facilities-at-a-glance report that displays inspection, violation, and enforcement actions history for regulated facilities
- Sanitary sewer overflow reports of spills reported online

Additionally, functionality being developed in CIWQS promises to move us well beyond where we were in terms of data quality, data entry and management, and public access to information on compliance. One of the key elements of this is electronic submittal of monitoring reports, and direct entry of violation information by dischargers. This is essentially taking the paper-based reporting process used now and having the dischargers provide this information online. We anticipate that as this functionality is implemented for all our NPDES Permits, the quality and completeness of routine compliance monitoring data will improve dramatically.

DRAFT

(A) A compilation of the number of violations of waste discharge requirements in the previous year.

Wastewater

Wastewater facilities discussed in this report are those facilities that are permitted to discharge pollutants to surface waters and include sewage treatment plants, food processors, oil refineries, power plant cooling waters, pulp and paper mills, mining operations, fish hatcheries, etc. During the reporting period, there were 2,274 active wastewater facilities regulated by NPDES waste discharge requirements in California. These facilities are divided into two categories:

- Major facilities – Facilities with an average daily discharge greater than 1 million gallons per day or those that pose a high degree of threat to water quality;
- Minor facilities – Facilities with an average daily flow less than 1 million gallons per day and that have a lower threat to water quality.

The waste discharge requirements (hereinafter “NPDES permits” or “permits”) are issued as individual permits or as general permits. Dischargers who are eligible for coverage under a general permit must enroll and agree to comply with the conditions of the general permit.

A summary of active NPDES facilities by category and Regional Water Board is shown in Table 1.

Table 1: NPDES Wastewater Permits by Category and Regional Office

Regional Office	MAJOR FACILITIES	MINOR FACILITIES			Total
	INDIVIDUAL Permits	GENERAL Permit Enrollees	INDIVIDUAL Permits	Total Minor	
1	16	24	30	54	70
2	70	211	52	263	333
3	25	95	29	124	149
4	52	534	87	621	673
5F	5	24	35	59	64
5R	14	20	58	78	92
5S	38	138	60	198	236
6A	1	18	4	22	23
6B	2	9	12	21	23
7	15	37	18	55	70
8	18	387	22	409	427
9	18	70	26	96	114
Total	274	1,567	433	2,000	2,274

Table 2 lists the total number of violations of NPDES permits by Regional Water Board office for each of the past five years. The table shows a generally consistent number of violations statewide though this does not track for all the Regional Water Board offices. The increase in the number of violations in 2003 and 2004 is in part explained by an increased diligence in recording violations, particularly mandatory minimum penalty violations. As noted elsewhere in this report, deployment of the CIWQS database in

mid-2005 resulted in a drop in data entry, though some Regional Water Board offices maintained consistency in data entry.

Table 2: Number of Violations of NPDES Wastewater Permits 2000 to 2007

Violations of NPDES Waste Discharge Requirements								
Regional Office	2000	2001	2002	2003	2004	2005	2006	2007
1	974	705	443	494	697	290	194	54
2	447	479	285	256	273	296	324	139
3	363	404	324	216	416	411	413	245
4	1,541	1,372	1,065	2,166	2,005	1,209	1,972	392
5F	222	447	712	561	285	142	53	113
5R	225	94	101	74	50	120	98	25
5S	1,126	818	778	981	1,726	1,825	691	60
6A	10	11	18	11	9	5	1	2
6B	4	10	21	25	22	14	118	2
7	128	187	198	316	166	192	272	113
8	452	284	127	112	161	244	152	69
9	227	206	122	188	488	127	169	299
Total	5,719	5,017	4,194	5,400	6,298	4,875	4,457	1,513

A comparison of the number of violations by Regional Water Board and the number of facilities regulated in that Regional Water Board is provided in Table 3. A comparison of the average number of violations per facility assists in recognizing Water Boards or facilities that have above-average and below-average compliance rates.

Table 3: Number of Violations per Wastewater Facility for 2007

Number of Facilities Compared to Number of NPDES Violations Calendar Year 2007			
Regional Office	NPDES Facilities	Total Violations	Violations per facility
1	70	54	0.77
2	333	139	0.42
3	149	245	1.64
4	673	392	0.58
5F	64	113	1.77
5R	92	25	0.27
5S	236	60	0.25
6A	23	2	0.09
6B	23	2	0.09
7	70	113	1.61
8	427	69	0.16
9	114	299	2.62
Total	2,274	1,513	Average: 0.86

The data indicate an uneven distribution of the average number of violations per facility among the different Regional Water Board offices. The reasons for this variability include differences in facility-specific requirements, differences in Regional Water Board office processes and priority assigned to report review and data entry, and differences in rates of compliance among dischargers. As noted above, the data for 2007 is incomplete due to the fact that not all monitoring

reports for 2007 have been received or reviewed, and not all violations have been recorded by staff. Variability due to report review and data entry should be reduced with the electronic submittal being implemented through our improved data system. Recent efforts to standardize permit terms will reduce the differences in facility specific requirements over the next few years as permits are renewed.

A breakdown of the violation types and the number of those violations that are identified as priority violations is presented in Table 4. A more detailed description of each violation category is provided in Appendix B. Violations vary from not submitting monitoring reports on time to acute toxicity violations. The Water Boards identify priority violations based on criteria identified in the Water Quality Enforcement Policy (Resolution No. 2002-0040) (<http://www.waterboards.ca.gov/plnspols/docs/wqep.doc>). A priority violation represents a greater threat to water quality than other violations. Approximately thirty percent of NPDES wastewater violations have been identified as priority violations.

It is important to note that the term “priority” violation used in this context is different than “serious” violations discussed in the following section on mandatory minimum penalties. The term “serious” violation is defined in sections 13385(h) and 13385.1 of the Water Code. All “serious” violations are considered priority violations, but not all priority violations are “serious” violations.

Table 4: NPDES Wastewater Violations by Category for 2007

Breakdown of the Number of NPDES Violations by Category for 2007					
Description of Violation Category (See Appendix B)	Total Violations		Priority Violations		
	Number	%	Number	% of Total Priority	% of Total Violations
Category 1 Pollutant	462	30%	107	31%	7%
Other Effluent Violation	413	27%	36	10%	2%
Reporting	276	18%	66	19%	4%
Category 2 Pollutant	143	9%	108	31%	7%
Receiving Water	69	4%	19	5%	1%
Monitoring	49	3%	1	0%	0%
Sanitary Sewer Overflow	43	3%	5	1%	0%
Violation of Non-Effluent Permit Condition	33	2%	1	0%	0%
Acute Toxicity	15	1%	3	1%	0%
Chronic Toxicity	10	1%	3	1%	0%
Unauthorized Discharge	21	1%	0	0%	0%
Other Requirement	5	0%	0	0%	0%
Groundwater	2	0%	0	0%	0%
Unregulated Discharge	1	0%	0	0%	0%
Total	1,542		349		23%

NPDES Stormwater

The Stormwater Program encompasses five categories of dischargers subject to the Federal Stormwater permit requirements. At the time of report preparation, nearly 30,000 facilities or permittees are regulated by NPDES stormwater permits in California. Below is a brief description of each of the five categories:

- **Industrial Activities** – The Industrial Storm Water General Permit Order 97-03-DWQ ([General Industrial Permit](#)) is an NPDES permit that regulates discharges associated with 10 broad categories of industrial activities other than construction. In general, discharges from manufacturing, transportation, and recycling facilities are subject to this permit.
- **Construction Activities** – Dischargers whose projects disturb one or more acres of soil or are part of a larger common plan of development or sale are required to obtain coverage under the General Permit for Discharges of Storm Water Associated with Construction Activity ([Construction General Permit - CGP - Order No. 99-08-DWQ](#)). Construction activity subject to this permit includes clearing, grading and disturbances to the ground such as stockpiling, or excavation, but does not include regular maintenance activities performed to restore the original line, grade or capacity of the facility. Typical CGP permit coverage lasts about 1 year, so this permit program sees a lot of turnover. As construction activities are temporary and the most prevalent pollutant problem is sediment discharges, the State Water Board has adopted this permit separate from the General Industrial Permit, similar to the approach taken by USEPA.
- **Linear Stormwater Facilities** –Underground/Overhead Projects disturbing at least 1 acre but less than 5 acres (including trenching and staging areas) are covered by the Statewide General Permit for Storm Water Discharges Associated with Construction Activity from Small Linear Underground/Overhead Projects ([Small LUP General Permit](#))
- **Municipal Stormwater Phase I Facilities** – The Municipal Storm Water Permits regulate storm water discharges from municipal separate storm sewer systems (MS4s). Under [Phase I](#), which started in 1990, the Regional Water Boards have issued NPDES MS4 permits to permittees serving populations greater than 100,000 people. Many of these permits are issued to a group of co-permittees encompassing an entire metropolitan area.
- **Municipal Stormwater Phase II Facilities** – Under [Phase II](#), the SWRCB adopted a General Permit for the Discharge of Storm Water from Small MS4s (WQ Order No. 2003-0005-DWQ) to provide permit coverage for smaller municipalities (10,000 to 100,000 people), including non-traditional Small MS4s which are governmental facilities such as military bases, public campuses, and prison and hospital complexes.

Stormwater permits are generally issued as individual permits to the Phase 1 MS4s and as general permits to the other categories. Dischargers who are eligible for coverage under a general permit must enroll and agree to comply with the conditions of the general permit.

The Water Boards currently implement the storm water program. The program is supported by fees collected from permittees. The current program expends about \$12 million per year and supports about 100 staff at the Water Boards.

The current level of program staffing resources is not sufficient to fully implement the storm water program. Full implementation would generally include at least one inspection at each facility, full review of stormwater pollution prevention plans (SWPPPs) and annual reports, appropriate follow-up and enforcement of permit violators, and comprehensive identification and enforcement of non-filers. In a previous report that was submitted to the Legislature, the State Water Board estimated that the Phase I program would need 199 staff to implement and an additional 112 staff to implement the Phase II program. This estimate was based upon a needs analysis conducted by the State Water Board for its core regulatory programs as required by Supplemental Language to the 1999/2000 State Budget. Since the completion of the needs analysis, additional resources are needed in response to recent Appellate Court decisions and an increased permit enrollment of 20%.

A summary of active NPDES stormwater facilities by category and Regional Water Board is shown in Table 5.

Table 5: NPDES Stormwater Permittees by Permit Type and Regional Office

Regional Office	Construction	Industrial	Linear	Municipal Phase I**	Municipal Phase II**	Total
1	473	348	1	7	9	838
2	1,893	1,413	15	77	28	3,426
3	783	397	4	3	25	1,212
4	2,834	2,918	10	104	0	5,866
5F	1,396	557	6	8	13	1,980
5R	514	187	3	3	3	710
5S	3,427	1,154	13	21	49	4,664
6A	151	36	2	5	0	194
6B	987	167	5	1	4	1,164
7	732	167	2	14	0	915
8	3,547	1,542	12	72	0	5,173
9	2,802	745	12	79	0	3,638
Total	19,539	9,631	85	394	131	29,780

Table 6 lists the total number of violations of NPDES stormwater permits by Regional Water Board office for each of the past five years.

Table 6: Number of Violations of NPDES Stormwater Permits 2000 to 2007

Violations of NPDES Stormwater Waste Discharge Requirements								
Regional Office	2000	2001	2002	2003	2004	2005	2006	2007
1	70	61	51	87	11	0	5	1
2	138	18	103	63	112	8	3	2
3	19	29	94	28	197	453	60	57
4	204	1,170	1,129	696	510	270	210	123
5F	12	5	6	9	105	304	238	3
5R	62	21	127	27	153	48	69	56
5S	176	45	56	201	375	463	523	163
6A	22	30	69	49	75	40	68	2
6B	46	74	15	1	0	2	8	9
7	48	11	21	0	49	2	1	39
8	616	751	383	264	385	466	269	372
9	151	294	460	372	361	160	137	118
Total	1,564	2,509	2,514	1,797	2,333	2,216	1,591	945

A breakdown of the storm water violations by violation type is presented in Table 7. Approximately one percent of NPDES stormwater violations have been identified as priority violations.

Table 7: NPDES Stormwater Violations by Category for 2007

Breakdown of the Number of NPDES Stormwater Violations by Category for 2007					
Description of Violation Category (See Appendix B)	Total Violations		Priority Violations		
	Number	%	Number	% of Total Priority	% of Total Violations
Reporting	590	62%	231	85%	24%
BMP	122	13%	26	10%	3%
Failure to Pay Fees	113	12%	0	0%	0%
SWPPP	48	5%	4	1%	0%
Violation of Non-Effluent Permit Condition	29	3%	2	1%	0%
Unauthorized Discharge	12	1%	1	0%	0%
Unregulated Discharge	11	1%	5	2%	1%
Failure to Obtain Permit	4	0%	0	0%	0%
Other Requirement	4	0%	1	0%	0%
Monitoring	3	0%	1	0%	0%
Other Codes	2	0%	0	0%	0%
File	2	0%	0	0%	0%
Basin Plan Prohibition	1	0%	0	0%	0%
Other Effluent Violation	1	0%	0	0%	0%
Enforcement Action	1	0%	1	0%	0%
Fees	1	0%	1	0%	0%
Sanitary Sewer Overflow	1	0%	0	0%	0%
Total	945		273		29%

Most of the violations documented in the stormwater program are reporting violations. Most non-reporting violations in the stormwater program are discovered through site inspections. This situation differs from violations at NPDES wastewater facilities where

the majority of discharge violations are found through review of self-monitoring reports submitted by the dischargers themselves. This difference in recorded violations reflects the difference in how NPDES wastewater and stormwater sites are regulated. One major difference is that most wastewater facilities are given individual NPDES permits, while essentially all stormwater facilities are regulated via one of two general NPDES permits. Secondly, the vast majority of effluent limitations in wastewater NPDES permits are numeric, which are self-monitored and self-reported by the discharger. In contrast, stormwater NPDES permits currently contain no numeric effluent limitations and instead rely upon a suite of general narrative effluent limitations, made specific by a plan that is only kept at the site. Compliance determination for these effluent limitations at stormwater facilities therefore depends heavily upon site visits that include specific observations, analysis, and documentation by Water Board staff. Paperwork (i.e., reporting) violations for stormwater facilities are more efficiently detected and confirmed given our staff resources for the stormwater program. Together these factors could explain the preponderance of reporting violations in the stormwater program.

Ensuring compliance with stormwater NPDES permit effluent limitations for the nearly 30,000 permitted stormwater activities requires a large field presence. As noted above, the 2001 needs analysis concluded that staffing levels are below what is needed to fully oversee and inspect these facilities.

(B) A record of the formal and informal compliance and enforcement actions taken for each violation.

Wastewater

Enforcement actions taken as a result of a violation include both informal and formal actions. An informal enforcement action is any enforcement action taken by Water Board staff that is not defined in statute, such as staff letters and notices of violation. Formal enforcement actions are statutorily recognized actions to address a violation or threatened violation such as Cleanup and Abatement Orders. Appendix C describes the enforcement options used by the Water Boards.

Table 8: NPDES Wastewater Violations Compared to Completed Enforcement Actions

NPDES Violations Compared to Completed Enforcement Actions															
Calendar Year	2003			2004			2005			2006			2007		
Regional Office	Total Violations	Without Completed Enforcement	With Enforcement	Total Violations	Without Completed Enforcement	With Enforcement	Total Violations	Without Completed Enforcement	With Enforcement	Total Violations	Without Completed Enforcement	With Enforcement	Total Violations	Without Completed Enforcement	With Enforcement
1	464	153	311	650	219	431	267	93	174	181	37	144	54	32	22
2	257	108	149	273	99	174	296	131	165	323	219	104	139	92	47
3	216	144	72	425	216	209	411	123	288	414	188	226	245	85	160
4	2126	448	1678	1864	1044	820	1129	565	564	1821	1098	723	392	235	157
5F	550	117	433	285	75	210	142	25	117	53	40	13	113	110	3
5R	74	33	41	51	7	44	107	26	81	76	38	38	25	0	25
5S	983	455	528	1727	791	936	1825	782	1043	692	359	333	60	39	21
6A	11	3	8	9	6	3	7	3	4	1	0	1	2	2	0
6B	25	10	15	23	5	18	14	3	11	118	26	92	2	2	0
7	316	21	295	166	36	130	191	12	179	272	5	267	113	0	113
8	129	55	74	184	91	93	245	33	212	152	14	138	69	12	57
9	218	9	209	545	9	536	127	15	112	214	17	197	299	9	290
Total	5369	1556	3813	6202	2598	3604	4761	1811	2950	4317	2041	2276	1513	618	895
Percentage		29%	71%		42%	58%		38%	62%		47%	53%		41%	59%

Table 8 shows the number of violations for 2003 to 2007. It also lists the number of violations for which there is no completed enforcement action currently entered in CIWQS (enforcement is still pending for some, but not all, of these violations), and the number of violations that are linked to an enforcement action. The percentages at the bottom show each violation category as a percentage of the total number of violations.

Table 9 shows the percentage of violations linked to an enforcement action. While Water Board authorities for enforcement are significant, resource levels generally preclude enforcement against every violation.

Table 9: Percentage of NPDES Wastewater Violations with a Completed Enforcement Action.

Regional Office	2003		2004		2005		2006		2007	
	Violations	With Enforcement	Violations	With Enforcement	Violations	With Enforcement	Violations	With Enforcement	Violations	With Enforcement
1	464	67%	650	66%	267	65%	181	80%	54	41%
2	257	58%	273	64%	296	56%	323	32%	139	34%
3	216	33%	425	49%	411	70%	414	55%	245	65%
4	2,126	79%	1,864	44%	1,129	50%	1,821	40%	392	40%
5F	550	79%	285	74%	142	82%	53	25%	113	3%
5R	74	55%	51	86%	107	76%	76	50%	25	100%
5S	983	54%	1,727	54%	1,825	57%	692	48%	60	35%
6A	11	73%	9	33%	7	57%	1	100%	2	0%
6B	25	60%	23	78%	14	79%	118	78%	2	0%
7	316	93%	166	78%	191	94%	272	98%	113	100%
8	129	57%	184	51%	245	87%	152	91%	69	83%
9	218	96%	545	98%	127	88%	214	92%	299	97%
Total	5,369	71%	6,202	58%	4,761	62%	4,317	53%	1,513	59%

GREEN	More than 90% of violations with completed enforcement
YELLOW	Between 80% and 90% of violations with completed enforcement
RED	Less than 80% of violations with completed enforcement

As noted above, there can be a significant lag in the time between discovery and reporting of a violation, and the resulting enforcement actions. This is due to available staffing and the time it takes to pursue enforcement, particularly for complex enforcement cases. Additionally, minor violations may be resolved before enforcement is taken. As a result, the percentage of violations where enforcement has been taken is lower for more recent violations, and tends to increase as time goes by and additional actions are taken for past violations. The higher percentage in 2007 is likely indicative of the fact that not all violations have yet been recorded for 2007.

Stormwater

Table 10 shows the number of stormwater violations for the last five years. It also lists the number of stormwater violations addressed by enforcement actions. The percentages at the bottom show each violation category as a percent of the total number of violations.

Table 10: NPDES Stormwater Violations Compared to Completed Enforcement Actions

NPDES Stormwater Violations Compared to Completed Enforcement Actions															
Calendar Year	2003			2004			2005			2006			2007		
Regional Office	Total Violations	Without Completed Enforcement	With Enforcement	Total Violations	Without Completed Enforcement	With Enforcement	Total Violations	Without Completed Enforcement	With Enforcement	Total Violations	Without Completed Enforcement	With Enforcement	Total Violations	Without Completed Enforcement	With Enforcement
1	89	1	88	10	0	10	0	0	0	5	0	5	1	0	1
2	65	2	63	6	2	4	6	2	4	1	1	0	1	1	0
3	30	0	30	201	3	198	210	3	207	55	0	55	57	2	55
4	715	3	712	509	1	508	270	1	269	198	2	196	116	4	112
5F	9	0	9	105	8	97	305	10	295	240	3	237	0	0	0
5R	27	6	21	153	4	149	44	1	43	68	2	66	55	0	55
5S	202	3	199	380	4	376	460	7	453	529	9	520	146	61	85
6A	51	16	35	77	14	63	37	21	16	35	11	24	2	1	1
6B	1	1	0	0	0	0	1	1	0	8	8	0	3	2	1
7	0	0	0	49	2	47	1	0	1	0	0	0	37	1	36
8	266	7	259	270	32	238	455	39	416	229	21	208	371	13	358
9	403	27	376	379	31	348	169	19	150	147	30	117	160	16	144
Total	1858	66	1792	2139	101	2038	1958	104	1854	1515	87	1428	949	101	848
Percentage		4%	96%		5%	95%		5%	95%		6%	94%		11%	89%

Table 10 shows a very high enforcement response rate, much higher than in Table 8 for wastewater reporting. This is due in part to the fact that these violations are often entered into the database at the same time the enforcement action is entered into the database.

(C) An analysis of the effectiveness of current policies, including mandatory minimum penalties (MMPs).

Mandatory Minimum Penalties (MMPs)

Background

California Water Code section 13385 requires MMPs for specified violations of NPDES permits. For violations that are subject to those MMPs, the Water Board must either assess an Administrative Civil Liability (ACL) for the minimum penalty or assess an ACL for a greater amount. California Water Code section 13385(h) requires a MMP of \$3,000 for each “serious” violation. A serious violation is defined as any waste discharge that exceeds the effluent limitation for a Group I pollutant by 40 percent or more, or a Group II pollutant by 20 percent or more. It is important to note that all serious violations are considered to be priority violations. Priority violations are discussed in Section (A) above.

The Water Boards are also required by California Water Code section 13385(i) to assess MMPs of \$3,000 for multiple chronic violations. This penalty applies when the discharger does any of the following four or more times in any period of six consecutive months:

- 1) Violates effluent limitations;
- 2) Fails to file a report of waste discharge pursuant to California Water Code section 13260;
- 3) Files an incomplete report of waste discharge pursuant to California Water Code section 13260; or
- 4) Violates a toxicity effluent limitation where the WDR does not contain pollutant-specific effluent limitations for toxic pollutants.

California Water Code section 13385(j) includes several limited exceptions to the mandatory minimum penalty provisions. The primary exceptions are for discharges that are in compliance with a cease and desist order or time schedule order under narrowly specified conditions. California Water Code section 13385(k) provides an alternative to assessing MMPs against a publicly owned treatment works (POTW) that serves a small community with a financial hardship. This is because it was recognized that the per capita cost of treatment and compliance is often higher for these communities. Under this alternative, the Water Boards may require the POTW to spend an amount equivalent to the mandatory minimum penalty toward a compliance project that is designed to correct the violations.

California Water Code section 13385.1, effective January 1, 2004, defines the term “effluent limitation” and expands the definition of a “serious violation” in California Water Code section 13385(h) to include failure to file a discharge monitoring report for each 30 days it is late. Section 13385.1 also re-defines MMPs as applicable only to permits in which the location of the discharge is specified. Most general NPDES permits do not specify the location of discharge and are therefore not subject to MMPs for effluent or reporting violations.

Summary of MMP Violations and MMP Enforcement Actions

According to the CIWQS database, 19,202 MMP violations occurred between January 1, 2000 and December 31, 2007. Of these, 9,610 (58 percent) are recorded as having received a minimum or greater penalty. Some portion of the reported effluent violations may qualify for statutory exemptions.

Table 11 shows the number of violations that have had penalties issued by each Regional Water Board office.

Table 11: Status of Violations Subject to MMPs from January 2000 to December 2007

Violations Subject to MMPs - January 2000 to December 2007				
Regional Office	Total MMP Violations	Violations With MMP Enforcement	Violations Without Completed MMP Enforcement	% Without
1	2,318	1,367	951	41%
2	1,874	1,265	609	32%
3	826	582	244	30%
4	5,041	1,281	3,760	75%
5F	1,532	677	855	56%
5R	162	112	50	31%
5S	4,357	1,938	2,419	56%
6A	0	0	0	N/A
6B	15	5	10	67%
7	775	447	328	42%
8	1,667	1,376	291	17%
9	635	560	75	12%
TOTAL	19,202	9,610	9,592	42%

Table 12 lists the number of facilities in each Regional Water Board office that have one or more MMP violations, the number of facilities for which MMPs have been issued for all MMP violations, and the number of facilities that would require at least one enforcement action to cover the outstanding MMP violations. As shown, 389 or more enforcement actions would be necessary to cover the 9,592 violations subject to MMPs.

**Table 12: Facilities with MMP Violations and Pending Enforcement Actions
January 2000 to December 2007**

Regional Office	Facilities with MMP effluent violations	Facilities with all MMP penalties issued	Facilities with pending MMP penalties
1	31	5	26
2	62	18	44
3	30	3	27
4	188	23	165
5F	20	2	18
5R	16	6	10
5S	64	14	50
6A	0	0	0
6B	3	1	2
7	20	4	16
8	19	4	15
9	25	9	16
TOTAL	478	89	389

Effectiveness of Mandatory Minimum Penalties on Effluent Violations

Early trends in MMP violations indicated an overall reduction in the number of violations at NPDES facilities. We believed that reduction was at least partly a result of increased compliance due to the deterrent effect of MMPs. Data in 2003 and 2004 showed an increase in violations, but we believe this is partly due to increased emphasis on recording and collecting these mandatory penalties. Additionally, the introduction of MMPs for reporting violations in 2004 put a greater emphasis on reviewing and tracking all such reports. The Regional Water Boards generally prioritize MMP issuance to facilities with greater compliance problems because of the staff resource costs associated with issuing MMPs and ACLs. While implementation of these MMPs was intended to be a streamlined process for penalty issuance, these penalties are often challenged by dischargers and can consume as much staff time as an ordinary ACL.

Our transition to a new data system in mid-2005 caused a drop in the numbers of MMP violations entered into the database and linked to the appropriate enforcement actions, limiting our ability to track some violations. This was due to confusion and concern regarding the proper use of this data system. We anticipate that electronic submittal of monitoring reports, and automated generation and tracking of violation information will significantly improve our confidence in the data for MMP violations, and should simplify MMP issuance. This may result in a greater number of known violations to validate and address, an increased need for enforcement responses to these violations, and a commensurate staff cost to issue them.

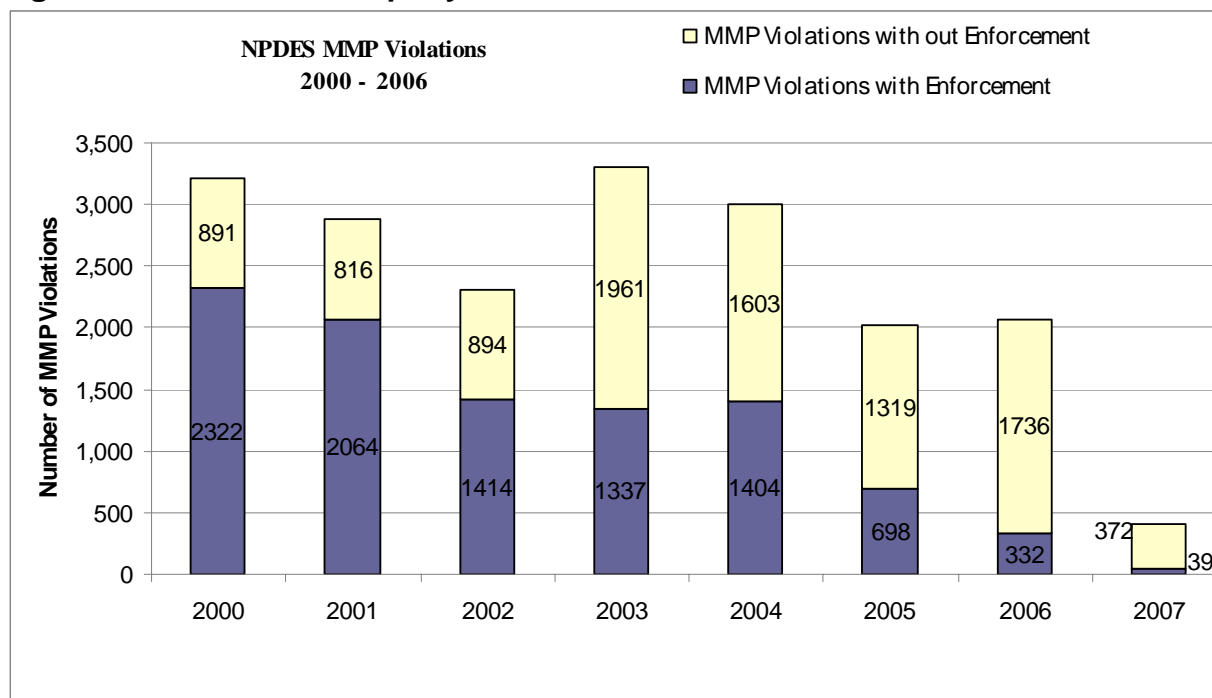
Figure 1: MMP violations per year since 2000.

Figure 1 shows MMP violations since 2000. We see a variation through the years. There is an initial decrease, followed by an increase in 2003 and 2004. This increase corresponds to an increased emphasis on collection and recording of violation data. The decrease in 2005 and 2006 reflects challenges to data collection related to implementation of a new data system in mid-2005 and competing priorities for staff time. Additionally, there are many MMP violations in 2007 that have not yet been entered by Regional Water Board staff.

Figure 2: NPDES Effluent Violations 2000 to 2007

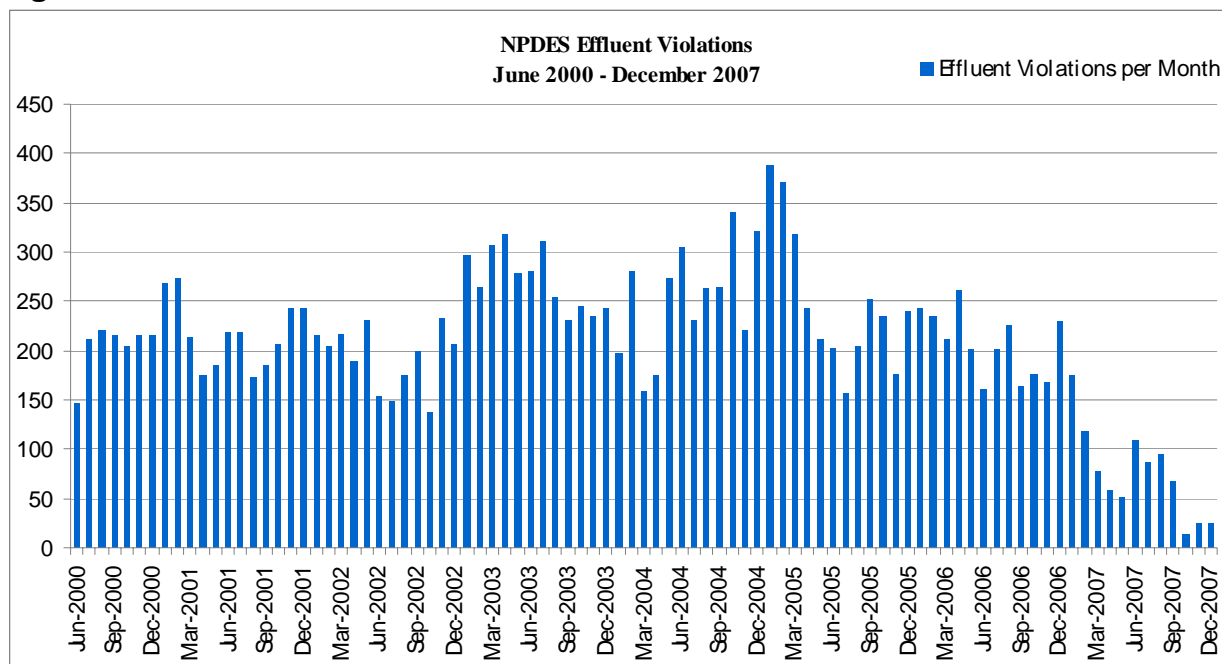
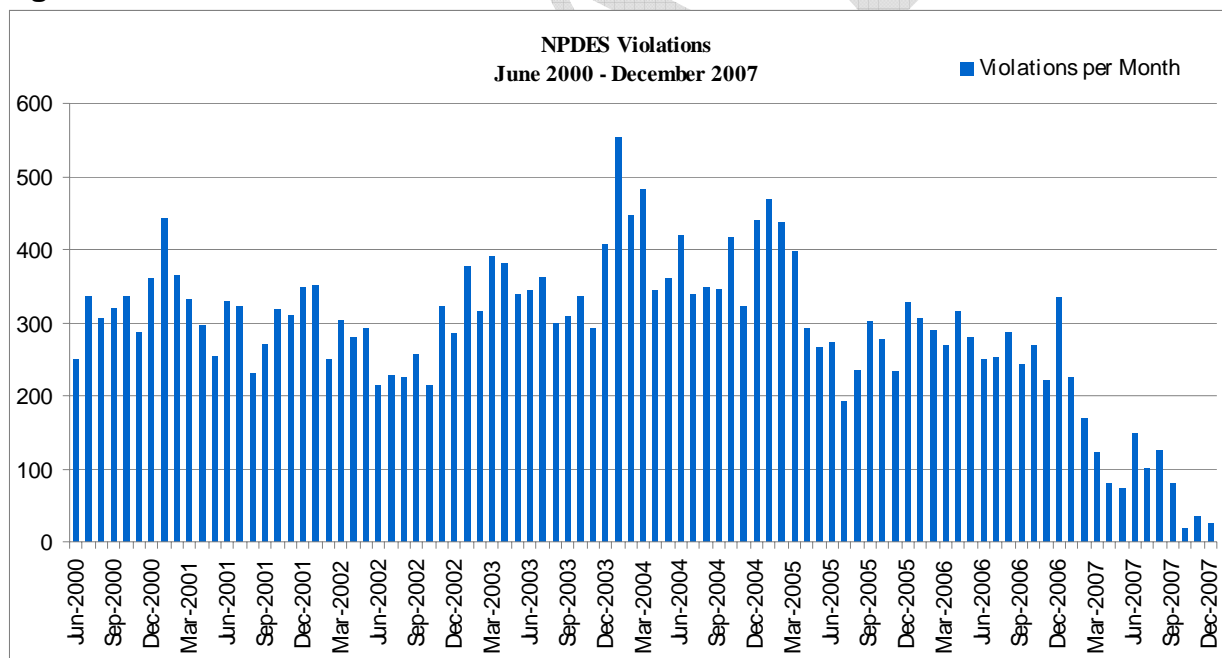


Figure 3: Overall NPDES Violations 2000 to 2007



The general trends in NPDES effluent violations shown in Figure 2 and overall violations in Figure 3 are consistent with that of Figure 1, and the reasons for this are largely the same.

Overall effectiveness

The data presented in the tables throughout this report provide various perspectives on Water Board effectiveness relative to violations and enforcement actions. Having this data in a database and being able to use it has been a significant accomplishment since the late 1990's. The data also reveals a substantial workload. Complications associated with deployment of the CIWQS database in mid-2005 have impacted the Water Boards' ability to effectively use this data to manage our enforcement program, and this was the subject of a recent external review. Recommendations from this review are discussed at the beginning of this report. The external panel's report is also available on-line at: http://www.waterboards.ca.gov/ciwqs/docs/ciwqs_prelimreport.pdf

Despite issuing millions of dollars in total penalties each year, and despite the changes from Fiscal Year 1996-1997 when only 5 percent of violations resulted in a formal enforcement action and 1 percent resulted in the assessment of an administrative civil liability,¹ the overall conclusion from review of the data is that the Water Boards need to further improve their effectiveness in handling violations and enforcement actions. However, despite this overall conclusion, there are success stories.

A case in point is an increased emphasis on prioritizing potential enforcement cases to ensure we are addressing the most significant threats. Based on an approach used by the San Diego Water Board, the Water Boards have developed a consistent format for prioritization, and regularly report this information to the State Water Board. Enforcement managers at each Regional Water Board meet regularly to discuss and prioritize potential enforcement cases.

Organizationally, the Regional Water Boards each have an identified enforcement unit or team, and the State Water Board created an Office of Enforcement in July, 2006 to ensure greater coordination and consistency in enforcement. Enforcement representatives from the Water Boards meet regularly to discuss enforcement matters and get feedback on enforcement approaches. The Office of Enforcement is also focusing on increased coordination with local, state, and federal law enforcement agencies, giving the Water Boards more enforcement tools and more efficient use of resources statewide in addressing water quality problems.

The Water Boards' Water Quality Enforcement Policy was last updated in 2002 (<http://www.waterboards.ca.gov/plnspols/docs/wqep.doc>) and is currently being revised. This Policy creates a framework for identifying and investigating instances of noncompliance, for taking enforcement actions that are appropriate in relation to the nature and severity of the violation, and for prioritizing enforcement resources to achieve maximum environmental benefits.

The Policy includes the following elements:

- An overview of water quality enforcement options.

¹ Legislative Analyst Office Analysis of 1999-2000 Budget Bill Resources Department 3 Issues.

- A process for identifying enforcement priorities and choosing the appropriate enforcement response.
- Provisions for more efficient use of standardized, enforceable permits and enforcement order language.
- Information to assist in integrated enforcement efforts with other agencies.
- Procedures for response to fraudulent reporting or knowingly withholding data.
- Specific guidance regarding assessment of administrative civil liability, use of supplemental environmental projects and compliance projects, handling of criminal activities, and standards for violation and enforcement reporting.

The Enforcement Policy provides appropriate approaches, practices, and considerations for effective enforcement. Improved implementation of the Enforcement Policy is needed to achieve its framework for effectiveness. Better implementation and needed changes will be addressed as the enforcement policy is revised in the following months. The draft revised Enforcement Policy can be found at:
http://www.waterboards.ca.gov/enforcement/policy_revisions.html

The Water Boards continue to face multiple competing priorities and pressures that limit our opportunities to implement the Enforcement Policy provisions. Issuing permits, for example, has become more complex and contentious in recent years. It has drawn staff resources away from dealing with violations and enforcement because of discharger reactions and challenges related to the California Toxics Rule, to MMPs, and to other factors. The number of permits each staff is responsible for issuing, overseeing, and enforcing has increased. MMPs have also changed enforcement priorities by mandating formal enforcement actions in response to violations that, given their relative threat to water quality, were often resolved through informal enforcement actions before. Mandatory issuance of penalties in the hundreds of thousands of dollars for some small communities has had a substantial impact on those communities, disproportionately impacting them relative to larger dischargers.

To overcome these obstacles and improve implementation of the Enforcement Policy, the Water Boards will undertake the following actions to increase staff efficiencies, prioritize enforcement activities, and increase management oversight and public information:

- Propose revision of the January 1 reporting deadline for the previous year's data to allow for more complete reporting of this data.
- Revise the Water Quality Enforcement Policy to ensure it is clear, current, and ensures compliance with existing permits and basin plans.
- Standardize NPDES permitting to increase certainty and expectations for staff and dischargers, and to restore efficiency and performance to these efforts.
- Standardize the issuance of MMPs to maximize efficiency and minimize the resource impacts of these new requirements.
- Continued development of electronic submittal and analysis of monitoring reports, and automated generation and tracking of violation information.
- Development of public reporting of violations and compliance rates of dischargers, both as a disincentive to violate and to build partnerships in

enforcement with public interest groups and interested communities. This includes development and public reporting of enforcement performance measures on the Internet to engage the public in a productive dialogue about discharger performance, environmental effects, Water Board workload, and Water Board performance.

- Issuance of an annual enforcement report that expands upon the reporting in this document, and includes an analysis of available enforcement resources, violation and enforcement data for all of our regulatory programs, and development of enforcement performance measures.
- Conduct an assessment of violations at federal facilities, and discuss the findings and recommendations with USEPA.
- Ensure the data reports presented above are available for live, public use on the Internet.

DRAFT

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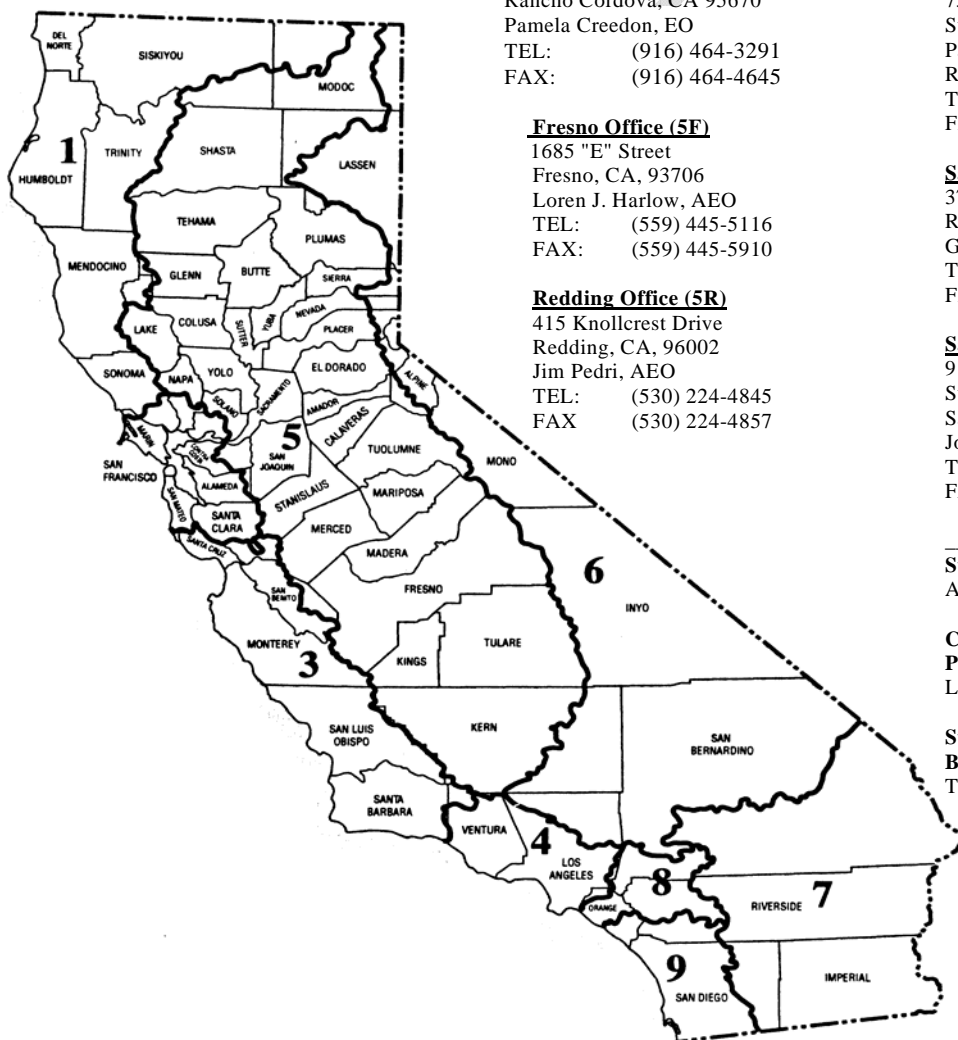
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Linda S. Adams, *Secretary*

State Water Resources Control Board

Tam M. Doduc, *Board Chair*

Appendix B	
LISTING AND DESCRIPTIONS OF VIOLATION TYPES USED IN THE CIWQS DATA SYSTEM	
<u>Category 1 pollutant</u> – Category 1 pollutants as defined by USEPA include:	
<u>Oxygen Demand</u> Biochemical Oxygen Demand Chemical Oxygen Demands Total Organic Carbon Other	<u>Detergents and Oils</u> MBAS NTA Oil and Grease Other detergents or algaecides
<u>Solids</u> Total Suspended Solids (Residues) Total Dissolved Solids (Residues) Other	<u>Minerals</u> Calcium, Chloride, Fluoride, Magnesium, Sodium, Potassium, Sulfur, Sulfate, Total Alkalinity, Total Hardness, Other Minerals
<u>Nutrients</u> Inorganic Phosphorus Compounds Inorganic Nitrogen Compounds Other	<u>Metals</u> Aluminum, Cobalt, Iron, Vanadium
<u>Category 2 pollutant</u> – Category 2 pollutants as defined by USEPA:	
<u>Metals</u> (all forms) - Other metals not specifically listed under Group I	
<u>Inorganics</u> - Cyanide, Total Residual Chlorine	
<u>Organics</u> - All organics are Group II except those specifically listed under Group I.	
<u>Other effluent violation</u> – Any violation of an effluent requirement not cover under Category 1 or Category 2.	
<u>Chronic Toxicity</u> – Violation of a chronic toxicity effluent requirement.	
<u>Acute Toxicity</u> – Violation of an acute toxicity effluent requirement.	
<u>Violation of Non-effluent Permit Condition</u> – Violation of any permit condition not pertaining to effluent requirements.	
<u>Reporting</u> – Late report, failure to submit a report, or a report that is either not complete or contains errors.	
<u>Monitoring</u> – Failure to conduct required monitoring	
<u>Compliance schedule</u> – Failure to comply with a compliance schedule in a permit. This does not include schedules in an enforcement order likes a Cease & Desist and Time Schedule Orders.	
<u>Sanitary Sewer Overflow</u> – Any spill from a sanitary sewer collection system or pump station.	
<u>Unauthorized Discharge</u> – Any discharge other than allowed by WDRs that is not a sanitary sewer overflow.	
<u>Unregulated Discharge</u> – Discharge from a site not currently under WDRs.	
<u>Groundwater</u> – Any release to groundwater that violates permit conditions or basin plan prohibitions.	
<u>BMP</u> – Failure to implement proper best management practices.	
<u>SWPPP</u> – Failure to complete or update a stormwater pollution prevention plan.	
<u>Failure to obtain permit</u> – Failure to obtain the appropriate permit prior to discharge or regulated activity.	
<u>Other Codes</u> – Violations of codes sections other that the California Water Code.	
<u>Enforcement Action</u> – Failure to comply with a previous enforcement order by not meeting its requirements, its time schedule, or failure to pay penalties.	
<u>Basin Plan Prohibition</u> – Violation of any basin plan prohibition.	

Appendix C

Types and Classification of Enforcement Actions

Type of Enforcement Action	Description	Classification
Verbal Communication	Any communication regarding the violation that takes place in person or by telephone.	Informal
Staff Enforcement Letter	Any written communication regarding violations and possible enforcement actions that is signed at the staff level.	Informal
Notice of Violation	A letter officially notifying a discharger of a violation and the possible enforcement actions, penalties, and liabilities that may result. This letter is signed by the Executive Officer.	Informal
Notice to Comply	Issuance of a Notice to Comply per Water Code Section 13399.	Formal
13267 Letter	A letter utilizing Water Code Section 13267 authority to require further information or studies.	Formal
Clean-up and Abatement Order	Any order pursuant to Water Code Section 13304.	Formal
Cease and Desist Order	Any order pursuant to Water Codes Sections 13301-13303.	Formal
Time Schedule Order	Any order pursuant to Water Code Section 13300.	Formal
Administrative Civil Liability (ACL) Complaint	ACL Complaint issued by the Executive Officer for liability pursuant to Water Code 13385.	Formal
Administrative Civil Liability (ACL) Order	An ACL Order that has been imposed by the Water Board or SWRCB.	Formal
Settlement	A settlement agreement per California Government Code Section 11415.6	Formal
Referral	Referral to the District Attorney, Attorney General, or USEPA.	Formal
Referred to a Task Force	Any referral of a violation to an environmental crimes task force.	Formal
Referral to Other Agency	Any referral to another State Agency.	Formal
Third Party Action	An enforcement action taken by a non-governmental third party and to which the State or Water Board is a party.	Formal
Waste Discharge Requirements	Any modification or rescission of Waste Discharge Requirements in response to a violation.	Formal

Appendix D

List of Facilities with Effluent Violations Subject to MMP Actions and Violations Receiving Penalties by Regional Board Office from 1-1-2000 through 11-29-2007.

Regional Office	AGENCY	FACILITY	WDID	MMP Violations (Includes both confirmed and alleged MMP violations)	Violations Receiving Penalty (Does not include pending Penalties)
1	SONOMA CNTY WATER AGENCY	SCWA OCCIDENTAL CSD	1B83001OSON	474	312
1	ARCATA CITY	ARCATA CITY WWTF	1B82114OHUM	354	250
1	HCRID #1	SHELTER COVE POTW	1B84086OHUM	181	17
1	TULELAKE CITY	TULELAKE CITY WWTP	1A84002OSIS	179	135
1	LOLETA CSD	LOLETA POTW	1B80081OHUM	148	79
1	FORT BRAGG CITY	FORT BRAGG CITY WWTP	1B84083OMEN	144	130
1	MCKINLEYVILLE CSD	MCKINLEYVILLE WWTP	1B82084OHUM	122	81
1	CRESCENT CITY	CRESCENT CITY WWTP	1A84006ODN	90	72
1	SANTA ROSA CITY	SANTA ROSA CITY WWTP, LAGUNA	1B83099OSON	84	38
1	FERNDALE CITY	FERNDALE CITY POTW	1B83136OHUM	80	29
1	SONOMA CNTY WATER AGENCY	GRATON CSA	1B84060OSON	78	30
1	SONOMA CNTY WATER AGENCY	SCWA RUSSIAN RIVER CSD	1B82045OSON	75	75
1	CRESCENT CITY HARBOR DISTRICT	CC HARBOR SEAFOOD WW SYSTEM	1A84005ODN	64	17
1	FORTUNA CITY	FORTUNA CITY WWTP	1B83135OHUM	54	24
1	FORESTVILLE WATER DISTRICT	FORESTVILLE WATER DISTRICT	1B83100OSON	47	33
1	MENDO CO WWD #2 ANCHOR BAY	MENDOCINO CWWD#2-ANCHOR BAY	1B83118OMEN	34	16
1	EVERGREEN PULP INC	EVERGREEN PULP INC (LP SAMOA)	1B77005OHUM	20	0
1	WILLITS CITY	WILLITS CITY WWTP	1B80078OMEN	18	12
1	REDWAY CSD	REDWAY POTW	1B83147OHUM	14	4
1	SONOMA WEST HOLDINGS INC	PLANT #2 FACILITY	1B81202OSON	11	0
1	HEALDSBURG CITY	HEALDSBURG CITY WWTP	1B82046OSON	10	0
1	CLOVERDALE, CITY OF	CLOVERDALE CITY WWTP	1B84032OSON	7	0
1	COLLEGE OF THE REDWOODS	COLLEGE OF THE REDWOODS, POTW	1B80121OHUM	7	0
1	UKIAH CITY	UKIAH CITY WWTP	1B84029OMEN	6	0
1	HARWOOD PRODUCTS	HARWOOD PROD. BRANSCOMB MILL	1B83056OMEN	5	5
1	RIO DELL CITY	RIO DELL CITY WWTF	1B83134OHUM	3	2
1	GREEN DIAMOND RESOURCE CO - KORBEL	KORBEL SAWMILL & WWDS	1B80020OHUM	2	0
1	EUREKA CITY	EUREKA CITY ELK RIVER WWTP	1B82151OHUM	2	1
1	CA DEPT OF FISH & GAME REDDING	CDF&G TRINITY RIVER HATCHERY W	1A80077OTRI	2	2
1	MENDOCINO CITY CSD	MENDOCINO CITY CSD	1B83129OMEN	2	2

Regional Office	AGENCY	FACILITY	WDID	MMP Violations (Includes both confirmed and alleged MMP violations)	Violations Receiving Penalty (Does not include pending Penalties)
1	PALCO	PL SCOTIA	1B83104OHUM	1	1
			Total	2318	1367

Regional Office	AGENCY	FACILITY	WDID	MMP Violations (Includes both confirmed and alleged MMP violations)	Violations Receiving Penalty (Does not include pending Penalties)
2	NOVATO SANITARY DISTRICT	NOVATO AND IGNACIO WWTP	2 215022001	261	228
2	NAPA SANITATION DISTRICT	NAPA SD WWTP	2 283009001	189	144
2	HANSON AGGREGATES	4501 TIDEWATER AVE, OAKLAND	2 019216001	178	0
2	PACIFICA, CITY OF	CALERA CREEK WATER RECYCLING PLANT	2 417022002	153	26
2	HANSON AGGREGATES	HANSON AGGREGATES SF PIER 92	2 386028001	110	110
2	FAIRFIELD-SUISUN SEWER DISTRICT	FSSD SUBREGIONAL WWTP	2 482005001	73	20
2	RICHMOND, CITY OF	RICHMOND WPCP	2 071037001	73	59
2	PETALUMA CITY	PETALUMA WPCP	2 494006001	73	64
2	SONOMA VALLEY COUNTY SD	SONOMA VALLEY COUNTY SD WWTP	2 494009001	56	54
2	BENICIA, CITY OF	BENICIA WWTP	2 482001001	54	52
2	PALO ALTO, CITY OF	PALO ALTO REGIONAL WQCP	2 438011001	54	54
2	EAST BROTHER LIGHT STATION INC	EAST BROTHER LIGHT STATION INC	2 071227001	48	0
2	GENERAL CHEMICAL	GENERAL CHEMICAL- WWTP	2 071001001	47	46
2	SOUTH SAN FRANCISCO-SAN BRUNO WQCP	SOUTH SAN FRANCISCO-SAN BRUNO WQCP	2 417038001	45	40
2	VALLEJO SAN AND FLOOD CONT DIS	VALLEJO SFCDD WWTP	2 482012001	34	32
2	RODEO SANITARY DISTRICT	RODEO SANITARY DISTRICT WWTP	2 071039001	32	11
2	SAUSALITO-MARIN CITY SAN DIST	SAUSALITO STP	2 215023001	31	30
2	AMERICAN CANYON CITY	AMERICAN CANYON WASTEWATER TREATMENT AND	2 283021001	27	27
2	CALISTOGA CITY	CALISTOGA CITY DUNAWAAL WWTP	2 283003001	26	24
2	LAS GALLINAS VALLEY SD	LAS GALLINAS WWTP	2 215012001	23	20
2	SAN MATEO CITY	SAN MATEO WWTP	2 417035001	23	21
2	SEWER AUTHORITY MID-COASTSIDE	SAM WWTP (SEWER AUTHORITY MID-COASTSIDE	2 417068001	22	20
2	WEST COUNTY AGENCY	COMBINED OUTFALL	2 071107001	21	11

Regional Office	AGENCY	FACILITY	WDID	MMP Violations (Includes both confirmed and alleged MMP violations)	Violations Receiving Penalty (Does not include pending Penalties)
2	CONOCOPHILLIPS RODEO	CONOCOPHILLIPS' S.F. REFINERY, RODEO - S	2 071051001	21	19
2	CONTRA COSTA CO. SAN DIST # 5	PORT COSTA WWTP	2 071034001	19	19
2	SUNNYVALE CITY	SUNNYVALE WPCP	2 438018001	16	16
2	SAN FRANCISCO AIRPORT COMMISSION	SAN FRANCISCO INTERNATIONAL AIRPORT WQCP	2 417032001	15	14
2	CENTRAL MARIN SANITATION AGENCY	CENTRAL MARIN SAN. AGENCY WWTP	2 215116001	14	13
2	SAN FRANCISCO AIRPORT COMMISSION	SAN FRANCISCO INTERNATIONAL AIRPORT IWTP	2 417033001	12	7
2	PINOLE, CITY OF	CITY OF PINOLE WWTP	2 071032001	12	9
2	CA DEPT OF PARKS & REC (ANGEL ISLAND)	ANGEL ISLAND STATE PK - WWTP	2 215002001	12	11
2	TESORO REFINING & MARKETING CO	GOLDEN EAGLE REFINERY WWTP	2 071048001	11	10
2	BURLINGAME CITY	BURLINGAME WWTP	2 417005001	10	10
2	SEWERAGE AGENCY OF SOUTHERN MARIN	SASM WWTP	2 215015001	8	2
2	DELTA DIABLO SANITATION DIST.	DELTA DIABLO SAN. DIST. WWTP	2 071013001	8	8
2	SOUTH BAYSIDE SYSTEM AUTHORITY	SBSA WWTP	2 417037001	6	0
2	GENERAL ELECTRIC COMPANY	VALLECITOS NUCLEAR CENTER WWTP	2 019018001	6	4
2	DUBLIN SAN RAMON SERVICES DISTRICT (WWTP)	DUBLIN SAN RAMON SD WWTP	2 019033001	5	4
2	LIVERMORE CITY	CITY OF LIVERMORE WRP	2 019025001	5	5
2	MILLBRAE, CITY OF	MILLBRAE WWTP	2 417019001	3	0
2	VALERO REFINING COMPANY-CA	VALERO BENICIA REFINERY	2 482004001	3	0
2	WEST COUNTY WASTEWATER DISTRICT	WEST COUNTY WW DISTRICT WPCP	2 071107001	3	0
2	MARTINEZ REFINING CO	SHELL MARTINEZ REFINERY WWTP	2 071042001	3	2
2	NEW CENTURY BEVERAGE COMPANY	BOTTLING GROUP LLC	2 019320001	3	2
2	SAN MATEO, CITY OF (SAN MATEO STOPPP MEM)	SAN MATEO WWTP	2 417035001	3	3
2	ORO LOMA SANITARY DISTRICT	ORO LOMA/CASTRO VALLEY SD WPCP	2 019032001	2	0
2	GWF POWER SYSTEMS L. P.	GWF -SITE I (E. THIRD ST.) POWER PLANT	2 071170001	2	1
2	SAN FRANCISCO, CITY & CO	SF - SE NORTH POINT & BAYSIDE	2 386010001	2	1
2	USS-POSCO INDUSTRIES	USS POSCO INDUSTRIES - NPDES/SUB15	2 071059001	2	1
2	KOBE PRECISION INC	KOBE PRECISION INC	2 019328001	2	2
2	SANTA CLARA CO ROADS & AIRPORT	OREGON EXP UNDERPASS	2 438265002	2	2
2	EAST BAY MUNICIPAL UTILITY DISTRICT (WPC)	EBMUD SD#1-WET WTHR BYPASS	2 019014002	1	0

Regional Office	AGENCY	FACILITY	WDID	MMP Violations (Includes both confirmed and alleged MMP violations)	Violations Receiving Penalty (Does not include pending Penalties)
2	MARIN COUNTY SANITARY DISTRICT #5	MARIN CSD 5 PARADISE COVE WWTP	2 215021002	1	0
2	MIRANT DELTA, LLC	PITTSBURG POWER PLANT	2 071030001	1	0
2	MORTON INTERNATIONAL, INC.	MORTON SALT DIVISION- NEWARK	2 019112001	1	0
2	AMERICAN CANYON CITY	AMERICAN CANYON WASTEWATER TREATMENT AND	2 019025001	1	1
2	AMERICAN CANYON CITY	AMERICAN CANYON WASTEWATER TREATMENT AND	2 071045001	1	1
2	AMERICAN CANYON CITY	AMERICAN CANYON WASTEWATER TREATMENT AND	2 071051001	1	1
2	CHEVRON PRODUCTS COMPANY	RICHMOND REFINERY	2 071044001	1	1
2	MT. VIEW SANITARY DISTRICT	MT. VIEW SANITARY DISTRICT WWTP	2 071029001	1	1
2	NORTH SAN MATEO COUNTY SANITATION DISTRI	NORTH SAN MATEO COUNTY SANITATION DISTRI	2 417021001	1	1
2	PACIFIC GAS & ELECTRIC CO	HUNTERS POINT POWER PL	2 386003001	1	1
			Total	1874	1265

Regional Office	AGENCY	FACILITY	WDID	MMP Violations (Includes both confirmed and alleged MMP violations)	Violations Receiving Penalty (Does not include pending Penalties)
3	PISMO BEACH, CITY OF	PISMO BEACH WWTP	3 400106001	187	136
3	CA DEPT OF CORRECTIONS	CALIFORNIA MEN'S COLONY	3 400108001	165	137
3	SAN SIMEON CSD	SAN SIMEON WWTP	3 400110001	82	75
3	SAN LUIS OBISPO, CITY OF	SAN LUIS OBISPO WWTP	3 400107001	78	44
3	CA STATE PARKS	BIG BASIN WWTP	3 440800001	49	46
3	LOMPOC CITY	LOMPOC REGIONAL WWTP	3 420105001	48	38
3	SANTA BARBARA CITY PWD	EL ESTERO WWTP NPDES	3 420108001	37	32
3	HIGHLANDS SANITARY ASSOC	HIGHLANDS SA WWTP	3 270115001	31	18
3	PASO ROBLES, CITY OF	PASO ROBLES WWTP	3 400105001	23	10
3	RAGGED POINT INN	RAGGED POINT INN MOTEL	3 401001001	22	22
3	KING VENTURES	AVILA VALLEY HOT SPRINGS	3 40041144	17	0
3	SYCAMORE MINERAL SPRINGS	SYCAMORE MINERAL SPRINGS	3 400401145	14	0
3	SOUTH SAN LUIS OBISPO CO SD	SOUTH SAN LUIS OBISPO SD WWTP	3 400111001	12	0
3	MORRO BAY POWER PLANT	MORRO BAY POWER PLANT	3 402003002	10	4
3	MORRO BAY SD	MORRO BAY/CAYUCOS WWTP	3 400103001	9	8
3	SAN JUAN BAUTISTA, CITY OF	SAN JUAN BAUTISTA WWTP	3 350102001	7	3

Regional Office	AGENCY	FACILITY	WDID	MMP Violations (Includes both confirmed and alleged MMP violations)	Violations Receiving Penalty (Does not include pending Penalties)
3	CARPINTERIA SD	CARPINTERIA SD WWTP	3 420101001	7	4
3	CEMEX USA	CEMEX SANTA CRUZ CEMENT	3 442004003	6	1
3	MOSS LANDING POWER PLANT	MOSS LANDING POWER PLANT	3 272011001	3	0
3	CARMEL AREA WWD	CARMEL AREA WWTP	3 270101001	3	2
3	CALIFORNIA WATER SERVICE	CAL WATER STATIONS 64, 67, 69, 40-01	3 270307105	2	0
3	GILROY, CITY OF	TEST WELL DRILLING PROGRAM	3 430403188	2	0
3	KING VENTURES	AVILA VALLEY HOT SPRINGS	3 400401145	2	0
3	UNI-KOOL COMPANY	UNI-KOOL ABBOTT ST	3 272009001	2	0
3	WATSONVILLE, CITY OF	WATSONVILLE WWTP	3 440104001	2	0
3	WELL-PICT BERRIES, INC.	WELL-PICT BERRIES, INC.	3 440505306	2	0
3	CEMEX USA	RMC PACIFIC OLYMPIA SAND PLNT	3 442004003	1	0
3	CUYAMA COMMUNITY SERVICES DIST	CUYAMA CSD WWTP	3 421003001	1	0
3	GOLETA SD	GOLETA SD WWTP	3 420102001	1	1
3	PASO ROBLES, CITY OF	PASO ROBLES WATER DIVISION FLUSHING	3 400203003	1	1
			Total	826	582

Regional Office	AGENCY	FACILITY	WDID	MMP Violations (Includes both confirmed and alleged MMP violations)	Violations Receiving Penalty (Does not include pending Penalties)
4	SANTA PAULA CITY	SANTA PAULA WWRP	4A560108001	1123	0
4	SIX FLAGS MAGIC MOUNTAIN	AMUSEMENT PARK, VALENCIA	4A199002002	796	10
4	FILLMORE CITY	FILLMORE WWTP	4A560101002	300	170
4	CAMARILLO SANITARY DISTRICT	CAMARILLO WRP	4A560100001	222	112
4	SAN BUENAVENTURA CITY	VENTURA WRF	4A560107001	194	189
4	LOS ANGELES CITY DWP	HAYNES GENERATING STATION	4B193500002	177	71
4	THE BOEING COMPANY	SANTA SUSANA FIELD LABORATORY	4B562013002	147	90
4	DR HORTON LOS ANGELES HOLDING CO	OLY MANDALAY BAY SEA BRIDGE	4A561334001	105	0
4	PRAXAIR INC	PRAXAIR, WILMINGTON	4B192140001	91	6
4	MCA / UNIVERSAL CITY STUDIOS	UNIVERSAL CITY STUDIOS	4B199017001	86	86
4	CAMARILLO SANITARY DISTRICT	CAMARILLO WRP	4A567500187	82	0
4	WHEELABRATOR NORWALK ENERGY CO	STATE HOSPITAL COGENERATION PLANT	4B191168001	82	82

Regional Office	AGENCY	FACILITY	WDID	MMP Violations (Includes both confirmed and alleged MMP violations)	Violations Receiving Penalty (Does not include pending Penalties)
4	SANTA CLARITA CITY	DRAINAGE BENEFIT ASSESSMENT AREAS 6 & 18	4A191142001	76	22
4	LOS ANGELES CNTY SANITATION DISTRICTS	VALENCIA WWRP	4A190107023	71	61
4	EMERY FORWARDING	PTI TECHNOLOGICS	4A562443001	62	0
4	HARRIS WATER CONDITIONING	CULLIGAN WATER	4A561037001	59	3
4	VOPAK TERMINAL LOS ANGELES INC	VOPAK TERMINAL LOS ANGELES INC.	4B199019002	51	31
4	LOS ANGELES CITY DWP	SCATTERGOOD GENERATING STATION	4B193500003	50	45
4	COUNTRYWIDE FINANCIAL CORP	COUNTRYWIDE HOME LOANS (WESTLAKE VILLAGE)	4B196400034	49	0
4	AES REDONDO BEACH, LLC	REDONDO GENERATING STATION	4B192111003	40	37
4	LOS ANGELES CNTY SANITATION DISTRICTS	LOS COYOTES WWRP	4B190107015	38	0
4	OJAI VALLEY SANITARY DISTRICT	OJAI VALLEY WWTP	4A560104001	33	25
4	ROYAL CATERING	ROYAL CATERING, EL MONTE	4B191106001	30	30
4	INDUSTRY URBAN DEVELOPMENT AGENCY	CHERYL LANE DEWATERING SYSTEM	4B196000632	28	0
4	CSU LONG BEACH	CSU, LONG BEACH, POOL, ETC	4B190800001	28	28
4	LOS ANGELES COUNTY METROPOLITAN TRANSPOR	SEGMENTS 1,2A,2B,3 OPERATIONS	4B192515004	27	0
4	LOS ANGELES TURF CLUB	SANTA ANITA PARK	4B191319001	26	0
4	RADISSON LOS ANGELES AIRPORT	RADISSON LOS ANGELES AIRPORT	4B196400060	26	0
4	WASHINGTON MUTUAL	SHERMAN OAKS BRANCH	4B196000144	24	0
4	CA DEPT OF TRANSPORTATION DISTRICT 7 R4	ROUTE I-10 PAVEMENT REHAB. PROJECT	4B196000504	23	0
4	LOS ANGELES CITY, BUREAU OF SANITATION	DONALD TILLMAN WWRP	4B190106004	23	0
4	AIR PRODUCT & CHEMICALS	HYDROGEN PLANT & RELATED FACILITY	4B191285001	23	2
4	KINDER MORGAN (FORMER GATX)	SAN PEDRO MARINE TERMINAL	4B192124001	21	0
4	SIMI VALLEY CITY	SIMI VALLEY WWRP	4A560110001	21	13
4	RELIANT ENERGY MANDALAY, LLC	MANDALAY GENERATING STATION	4A562019001	20	1
4	KOREAN WORLD TOWER	LOS ANGELES APARTMENT BLDG	4B191019001	19	0
4	LOS ANGELES CNTY SANITATION DISTRICTS	SAN JOSE CREEK WWRP	4B190107020	19	0
4	SKYWORKS SOLUTIONS, INC.	SKYWORKS SOLUTIONS, INC.	4A562074001	19	19
4	PAGE MUSEUM @ LA BREA TAR PITS	PAGE MUSEUM @ LA BREA TAR PITS	4B196000333	18	0
4	LOS ANGELES CNTY SANITATION DISTRICTS	SAUGUS WWRP	4A190107021	17	0
4	RAYNE WATER SYSTEMS OF VENTURA	SOFT WATER SALES & SVC, VENTURA	4A569002001	17	0

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4	ROBERT CHAN	B.C. PLAZA	4B196400047	17	0
4	RODEO OWNER CORP.	TWO RODEO ASSOCIATES	4B196000373	17	10
4	HEXION SPECIALTY CHEMICALS, INC.	HEXION SPECIALTY CHEMICALS, INC. (FORMER	4B191297001	17	11
4	CONOCOPHILLIPS COMPANY	LOS ANGELES LUBRICANTS PLANT	4B192131013	16	0
4	LAS VIRGENES MWD	TAPIA WRF	4B190104001	16	2
4	REDONDO BEACH CITY	SEASIDE LAGOON	4B190143001	16	16
4	750 GARLAND, LLC	750 GARLAND, LLC	4B191070002	15	0
4	KIM & CASEY, LLC	RENO APARTMENTS	4B196000336	15	0
4	PLATINUM PARADIGM PROPERTIES	NORTH CRESCENT REALTY V, LLC	4B191112001	15	0
4	KINDER MORGAN (FORMER GATX)	CARSON TERMINAL	4B192238002	15	11
4	BOC GASES	BOC GASES - EL SEGUNDO	4B196400066	14	0
4	RP 120, LLC	RP 120, LLC	4B196000409	14	0
4	SANTA CLARITA CITY	SEGMENT C - MAGIC MOUNTAIN PARKWAY/I-5 O	4A197500172	14	0
4	SNYDER-MASSSELIN VENTURE L.P.	OFFICE DEPOT	4B197500033	14	0
4	TIDELANDS OIL PRODUCTION CO.	WILMINGTON AND TERMINAL ISLAND	4B192023001	14	0
4	AVALON, CITY OF	AVALON WWTF	4B190100001	13	0
4	LOS ANGELES CITY DWP	TANK A,B,C,D AREA, HAYNES TANK FARM, LON	4B190106007	13	13
4	DAYTON SUPERIOR SPECIALTY CHEM	EDOCO	4B192034001	12	0
4	GOLDEN STATE WATER COMPANY	OJAI SYSTEM	4A566300096	12	0
4	AES ALAMITOS, L.L.C.	ALAMITOS GENERATING STATION	4B192111006	11	0
4	LOS ANGELES CITY DWP	HARBOR GENERATING STATION	4B193500004	10	9
4	LOS ANGELES CNTY SANITATION DISTRICTS	JWPCP, CARSON	4B190107013	10	10
4	HONEYWELL INC.	HONEYWELL INC.	4B191263001	9	0
4	GOLDEN WEST REFINING COMPANY	SANTA FE SPRINGS REFINERY	4B192162001	9	9
4	EXXONMOBIL OIL CORPORATION	TORRANCE REFINERY	4B192079002	8	0
4	LOS ANGELES CITY DWP	HARBOR G.S. - MARINE TANK FARM	4B190106046	8	0
4	PLAZA 6000 PARTNERS LLC	RENO APARTMENTS	4B191210001	8	0
4	WESTWAY TERMINAL COMPANY	WESTWAY TERMINAL-BERTHS 70-71	4B192407001	8	0
4	HITCO CARBON COMPOSITES, INC.	HITCO/DEFENSE PROD DIV,	4B192128001	8	8
4	EDINGTON OIL CO.	LONG BEACH REFINERY - RAINFALL	4B192326003	7	0
4	REDMAN EQUIPMENT & MFG CO	REDMAN EQUIPMENT & MFG CO	4B192090001	7	3

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4	LOS ANGELES CNTY, PARKS & REC	VAL VERDE CO. PARK SWIM POOL	4A190107086	7	7
4	RMR PROPERTIES	RMR PROPERTIES	4B191086001	7	7
4	CONOCOPHILLIPS COMPANY	LA REFINERY, CARSON PLANT	4B192131026	6	0
4	DEPT OF WATER RESOURCES	WILLIAM E WARNE POWER PLANT	4A190805002	6	0
4	LEGACY PARTNERS II LB WORLD TRADE, LLC	ONE WORLD TRADE CENTER	4B197500208	6	0
4	LOS ANGELES CITY DWP	OLYMPIC TANK FARM SKIM POND	4B190106051	6	0
4	LOS ANGELES CNTY SANITATION DISTRICTS	WHITTIER NARROWS WWRP	4B190107016	6	0
4	PLAZA 6000 PARTNERS LLC	RENO APARTMENTS	4B196000336	6	0
4	ANACAPA MARINE SERVICES	ANACAPA MARINE SERVICES	4A562442001	6	6
4	550 SOUTH HOPE STREET ASSOCIATES	550 SOUTH HOPE STREET BUILDING	4B196000003	5	0
4	CALIFORNIA SULPHUR CO	SULFUR PELLETTIZING, WILMINGTON	4B192143001	5	0
4	COPPERFIELD INVESTMENT & DEVELOPMENT	WILSHIRE-HIGHLAND BUILDING	4B196000239	5	0
4	DIAL CORP, THE	SOUTHWEST GREASE BUSINESS	4B192545001	5	0
4	LONG BEACH WATER DEPT	LONG BEACH DESAL RES. FACILITY	4B190105019	5	0
4	REALTECH, INC.	MAPLE PLAZA	4B196000358	5	0
4	STELLAR BIOTECHNOLOGIES INC	PORT HUENEME AQUACULTURE PARK	4B191309001	5	0
4	BP WILMINGTON CALCINER	BP WILMINGTON PLANT	4B192208003	5	2
4	BEVERLY HILLS CITY	SITE "A" SOUTH PARKING STRUCTURE	4B196000356	4	0
4	CARRAMERICA REALTY CORP.	CARRAMERICA OFFICE BUILDING	4B196000474	4	0
4	CASDEN PARK LA BREA A LLC	PARK LA BREA, PARCEL A	4B196100055	4	0
4	CEMEX CONSTRUCTION MATERIALS LP	CEMEX (MOORPARK PLANT)	4A562022001	4	0
4	CWD CLOVERDALE II ASSOCIATES	328 CLOVERDALE APARTMENTS	4B196000242	4	0
4	DOUGLAS EMMETT & CO	TRILLIUM - 6320 CANOGA AVENUE	4B196000398	4	0
4	EL SEGUNDO POWER, L.L.C.	EL SEGUNDO GENERATING STATION	4B192111001	4	0
4	M & H PROPERTY MANAGEMENT	VILLA MARINA MARKET PLACE	4B196100069	4	0
4	MANTINI MANAGEMENT, INC.	DETROIT APARTMENTS	4B196000256	4	0
4	SANTA CLARITA CITY	EMERGENCY DEWATERING	4A567500069	4	0
4	TESORO PETROLEUM COMPANIES, INC.	TESORO-LA MIRADA SITE	4B197500064	4	0
4	TOPA MANAGEMENT CORP.	GATEWAY EAST OFFICE BLDG, LA	4B196000350	4	0
4	WHITTAKER CORP	WHITTAKER-BERMITE FACILITY (FORMER)	4A197500025	4	0
4	LOS ANGELES CITY DWP	TUNNEL # 105	4B190106099	4	4

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4	BEVERLY PLACE, L.P.	BEVERLY MERCEDES PLACE	4B196000371	3	0
4	BP WEST COAST PRODUCT LLC	MARINE TERMINAL #3	4B196300136	3	0
4	ELIXIR INDUSTRIES	ELIXIR INDUSTRIES	4B192575001	3	0
4	HARSU GAS MART	HARSU GAS MART	4B197500068	3	0
4	KAISER ALUMINUM & CHEMICAL	LOS ANGELES, CALIFORNIA PLANT	4B192389001	3	0
4	LAXFUEL CORPORATION	LAXFUEL CORPORATION	4B196800059	3	0
4	LOS ANGELES CITY DWP	TANK E AREA, HAYNES PLT, LB	4B190106049	3	0
4	LOS ANGELES CITY DWP	TANK F,G AREA,HAYNES PLT, LB	4B190106050	3	0
4	LOS ANGELES CITY PARKS & RECREATION	LOS ANGELES ZOO GRIFFITH PARK	4B190106036	3	0
4	LOS ANGELES CNTY SANITATION DISTRICTS	LONG BEACH WWRP	4B190107014	3	0
4	LOS ANGELES CNTY SANITATION DISTRICTS	POMONA WWRP	4B190107019	3	0
4	MALIBU CITY	BIG ROCK MESA DRAINAGE FACILITY	4B190107098	3	0
4	MERCURY CASUALTY COMPANY	HOME OFFICE BUILDING	4B196000332	3	0
4	MONTROSE CHEMICAL CORP OF CALIFORNIA	MONTROSE CHEMICAL CORP OF CALIFORNIA	4B197500040	3	0
4	OXNARD CITY	REDWOOD TRUNK SEWER PROJECT	4A567500002	3	0
4	STELLAR BIOTECHNOLOGIES INC	STELLAR BIOTECHNOLOGIES INC	4A565022002	3	0
4	EQUILON ENTERPRISES LLC DBA SHELL OIL PR	MORMON ISLAND MARINE TERMINAL	4B192108009	3	3
4	NORTHROP GRUMMAN SP & MSN INC.	SPACE PARK FACILITY	4B192557003	3	3
4	3M CO., EHS OPERATIONS	3M PHARMACEUTICALS	4B192594001	2	0
4	ARAMIS VARTANIAN MR. & MRS.	MAGIC GAS & AUTO SERVICE	4B196600197	2	0
4	DOUGLAS EMMETT & CO	CENTURY PARK PLAZA	4B196000514	2	0
4	DOUGLAS EMMETT WARNER CENTER TOWER	PLAZA 3, WARNER CENTER	4B196000313	2	0
4	FAIRCHILD HOLDING CORP.	VOI-SHAN REDONDO BEACH	4B192525001	2	0
4	FUEL CONTROLS INC.	FUEL CONTROLS INC.- LONG BEACH	4B196600173	2	0
4	HOME DEPOT USA INC	FORMER ITT AEROSPACE CONTROLS	4B192623001	2	0
4	HOOD CORPORATION	WHITTIER YARD (HOOD CORPORATION)	4B196600199	2	0
4	LOS ANGELES CITY, BUREAU OF SANITATION	HYPERION WWTP	4B190106002	2	0
4	LOS ANGELES CITY, BUREAU OF SANITATION	TERMINAL ISLAND WWTP	4B190106005	2	0
4	MR. AUTO	MR. AUTO	4B197500060	2	0
4	PETRO DIAMOND TERMINAL COMPANY	MARINE TERMINAL, BERTH 83, LONG BEACH	4B192197001	2	0
4	PLASKOLITE WEST, INC.	PLASKOLITE WEST INC.	4B192533001	2	0

Regional Office	AGENCY	FACILITY	WDID	MMP Violations (Includes both confirmed and alleged MMP violations)	Violations Receiving Penalty (Does not include pending Penalties)
4	TELEFLEX INC.	THE TALLEY SITE, NEWBURY PARK	4A562397002	2	0
4	WILSHIRE HOME OWNERS ASSOC.	THE WILSHIRE	4B196000367	2	0
4	WORLD OIL MARKETING CO.	WORLD OIL STATION #20 (FORMER)	4B196600167	2	0
4	HR TEXTRON INC.	VALENCIA FACILITY	4A192332001	2	1
4	LOS ANGELES CITY DWP	TANK H, J AREA, HAYNES PLT. LB	4B190106042	2	1
4	RELIANT ENERGY MANDALAY, LLC	ORMOND BEACH GENERATING STATION	4A562019002	2	1
4	VOPAK TERMINAL LONG BEACH INC	VOPAK TERMINAL LONG BEACH INC.	4B192614001	2	1
4	COLTEC INDUSTRIES INC.	FORMER MENASCO AEROSYSTEM FACILITY	4B191318001	2	2
4	PASADENA, CITY OF	DEPT OF WATER & POWER	4B190138001	2	2
4	PNEUMO ABEX AEROSPACE, INC.	PNEUMO ABEX AEROSPACE CORP.	4A561058001	2	2
4	1801 AVENUE OF THE STARS LP	OFFICE BUILDING	4B191067001	1	0
4	BEVERLY HILLS CITY	BEVERLY RO TREATMENT PLANT	4B196100114	1	0
4	BP WEST COAST PRODUCT LLC	BP CARSON REFINERY	4B192010008	1	0
4	CALIFORNIA DAIRIES INC	CALIFORNIA DAIRIES INC.	4B192454001	1	0
4	CASTAIC LAKE WATER AGENCY	PIPELINE REPLACEMENT PROJECT	4A197500067	1	0
4	CERTIFIED ALLOY PRODUCTS, INC.	CERTIFIED ALLOY PRODUCTS, INC.	4B196400064	1	0
4	CULLIGAN INDUSTRIAL WATER TREA	PURETEC HARRIS INDUSTRIAL WATER	4A562432001	1	0
4	DOUGLAS EMMETT, LLC	BRIGHTON ENTERPRISES	4B196000601	1	0
4	EQUILON ENTERPRISES LLC DBA SHELL OIL PR	LOS ANGELES REFINERY	4B192121001	1	0
4	KAISER ALUMINUM FABRICATED PRODUCTS, LLC	LOS ANGELES, CALIFORNIA PLANT	4B192389001	1	0
4	KINDER MORGAN (FORMER GATX)	LOS ANGELES HARBOR TERMINAL	4B192238001	1	0
4	LAKWOOD CITY	ARBOR YARD WELL NO. 27	4B197600048	1	0
4	LOS ANGELES CITY DWP	TUNNEL NO. 104	4B190106061	1	0
4	LOS ANGELES CITY, BUREAU OF SANITATION	LA-GLENDALE WWRP	4B190106001	1	0
4	MONTEREY PARK CITY	DELTA PLANT	4B196800061	1	0
4	MONTEREY PARK CITY	DELTA PLANT WELL NO. 5	4B196800062	1	0
4	ONE HUNDRED TOWERS LLC	CENTURY PLAZA TOWERS, OFFICES	4B196000408	1	0
4	OWENS-BROCKWAY GLASS CONTAINER	GLASS CONTAINER DIV, VERNON	4B192085002	1	0
4	PARAMOUNT PICTURES INC.	MARATHON OFFICE BUILDING	4B196000077	1	0
4	PLAYA CAPITAL CO LLC	PLAYA VISTA SITE	4B196800049	1	0
4	SOUTHERN CALIFORNIA WATER CO	DRINKING WELL-BALLONA PLANT	4B197600007	1	0

Regional Office	AGENCY	FACILITY	WDID	MMP Violations (Includes both confirmed and alleged MMP violations)	Violations Receiving Penalty (Does not include pending Penalties)
4	TESORO PETROLEUM	TARGET STORE 290	4B196800023	1	0
4	THE NEWHALL LAND AND FARMING CO	SEGMENT E OF VALENCIA COMMERCE CENTER P	4A197500121	1	0
4	THE NEWHALL LAND AND FARMING CO	SEGMENT A OF VALENCIA COMMERCE CENTER PR	4A197500117	1	0
4	THE NEWHALL LAND AND FARMING CO	SEGMENT B OF VALENCIA COMMERCE CENTER PR	4A197500118	1	0
4	THE NEWHALL LAND AND FARMING CO	SEGMENT C OF VALENCIA COMMERCE CENTER PR	4A197500119	1	0
4	THE NEWHALL LAND AND FARMING CO	SEGMENT D OF VALENCIA COMMERCE CENTER PR	4A197500120	1	0
4	THE NEWHALL LAND AND FARMING CO	SEGMENT K OF VALENCIA COMMERCE CENTER PR	4A197500122	1	0
4	THE NEWHALL LAND AND FARMING CO	SEGMENT L OF VALENCIA COMMERCE CENTER PR	4A197500123	1	0
4	THE NEWHALL LAND AND FARMING CO	SEGMENT M OF VALENCIA COMMERCE CENTER PR	4A197500124	1	0
4	THE NEWHALL LAND AND FARMING CO	SEGMENT N OF VALENCIA COMMERCE CENTER PR	4A197500125	1	0
4	THE NEWHALL LAND AND FARMING CO	SEGMENT O OF VALENCIA COMMERCE CENTER PR	4A197500126	1	0
4	THE NEWHALL LAND AND FARMING CO	SEGMENT P OF VALENCIA COMMERCE CENTER PR	4A197500127	1	0
4	THE NEWHALL LAND AND FARMING CO	SEGMENT Q OF VALENCIA COMMERCE CENTER PR	4A197500128	1	0
4	THE NEWHALL LAND AND FARMING CO	SEGMENT R OF VALENCIA COMMERCE CENTER PR	4A197500129	1	0
4	THE NEWHALL LAND AND FARMING CO	SEGMENT S OF VALENCIA COMMERCE CENTER PR	4A197500130	1	0
4	U.S. GYPSUM CO.	U.S. GYPSUM CO.	4B191287001	1	0
4	UNIVAR USA INC.	FORMER VOPAK USA INC.	4B196800038	1	0
4	US BORAX INC.	WILMINGTON PLANT	4B192129002	1	0
4	VENTURA CO WATERSHED PROTECTION DISTRICT	ARUNDELL BARRANCA	4A567500001	1	0
4	BP WEST COAST PRODUCT LLC	MARINE TERMINAL 1,BERTH 121,LB	4B192010015	1	1
4	EXXONMOBIL OIL CORPORATION	SOUTHWEST TERMINAL AREA I	4B192079001	1	1
4	KEYSOR-CENTURY CORP	PVC-PVA COPOLYMER MFG, SAUGUS	4A192000001	1	1
4	SHORE TERMINAL LLC	WILMINGTON MARINE TERMINAL	4B192263001	1	1
			Total	5041	1281

Regional Office	AGENCY	FACILITY	WDID	MMP Violations (Includes both confirmed and alleged MMP violations)	Violations Receiving Penalty (Does not include pending Penalties)
5F	CALIFORNIA DAIRIES, INC	TIPTON MILK & BUTTER PROC FAC	5D541067001	645	0
5F	MALAGA CWD	MALAGA CWD WWTF	5D100124001	528	522
5F	PLANADA CSD	PLANADA WWTF	5C240110001	112	112
5F	SOUTHERN CALIFORNIA EDISON CO	BIG CREEK POWERHOUSE NO 1	5C102009001	60	0
5F	VALLEY WASTE DISPOSAL CO	CAWELO RESERVOIR B	5D152013001	56	0
5F	MERCED, CITY OF	CITY OF MERCED WWTF	5C240108001	26	21
5F	CA DEPT OF FORESTRY	MTN HOME CONSERVATION CAMP	5D540800001	22	0
5F	ATWATER, CITY OF	ATWATER WWTF	5C240100001	22	22
5F	VALLEY GOLD, LLC	GUSTINE CHEESE PRC FACILITY	5C242033002	17	0
5F	CALIFORNIA DAIRIES, INC	LOS BANOS FOODS, INC	5C245017001	15	0
5F	ROCKWELL INTERNATIONAL	ROCKWELL INTERNATIONAL C/O GEO	5D542095001	6	0
5F	SOUTHERN CALIFORNIA EDISON CO	BALSAM MEADOWS HYDRO PROJ	5C102009007	5	0
5F	TAFT, CITY OF	TAFT FEDERAL PRISON WWTF	5D150115002	4	0
5F	CA DEPT OF FISH & GAME FRESNO	MERCED RIVER FISH HATCHERY	5C240804001	3	0
5F	VISALIA, CITY OF	VISALIA WWTF	5D540113001	3	0
5F	CALMAT OF CENTRAL CALIF	SANGER PLANT	5D102010001	2	0
5F	GRIFFIN RESOURCES	MOUNT POSO, POSCAL PAC VILLARD	5D152028001	2	0
5F	MARIPOSA PUD	MARIPOSA WWTP	5C221012001	2	0
5F	AAF-MCQUAY, INC	VISALIA CLEANUP-SYNDERGENERAL	5D542001002	1	0
5F	CALAVERAS TROUT FARM, INC	TROUT REARING FACILITY	5C242001001	1	0
			Total	1532	677

Regional Office	AGENCY	FACILITY	WDID	MMP Violations (Includes both confirmed and alleged MMP violations)	Violations Receiving Penalty (Does not include pending Penalties)
5R	CITY OF CHICO	CHICO WATER POLLUTION CONTROL PLANT	5A040102001	52	52
5R	BIGGS, CITY OF	BIGGS WWTP	5A040100001	30	30
5R	WILLOWS, CITY OF	WILLOWS WWTP	5A110101001	14	0
5R	REDDING CITY	CLEAR CREEK WWTP	5A450103001	12	12
5R	MINING REMEDIAL RECOVERY CO	MAMMOTH,SUTRO,KEYSTONE ET AL	5A459006001	10	0

Regional Office	AGENCY	FACILITY	WDID	MMP Violations (Includes both confirmed and alleged MMP violations)	Violations Receiving Penalty (Does not include pending Penalties)
5R	QUINCY COMMUNITY SERVICES DISTRICT	QUINCY WWTP & COLLECTION SYSTEM	5A320103001	7	4
5R	MILLENNIUM HOLDINGS LLC	BULLY HILL & RISING STAR MINES	5A459002001	6	0
5R	PORTOLA CITY	PORTOLA WWTP	5A320102001	5	0
5R	COLLINS PINE COMPANY	COLLINS PINE CHESTER SAWMILL	5A322000001	5	5
5R	SIERRA PACIFIC INDUSTRIES QUINCY	SIERRA PACIFIC INDUSTRIES QUINCY DIVISIO	5A321016001	4	3
5R	RED BLUFF CITY	RED BLUFF WW RECLAMATION PLANT	5A520101001	4	4
5R	HOLLY TREE RANCH DEVELOPMENT	GREENHORN MINE	5A459010001	3	0
5R	SHASTA LAKE CITY	SHASTA LAKE WWTF	5A450105001	3	0
5R	SIERRA PACIFIC INDUSTRIES BURNEY R5R	SIERRA PACIFIC INDUSTRIES BURNEY DIVISIO	5A452015001	3	0
5R	LEHIGH SOUTHWEST CEMENT CO R	LEHIGH SOUTHWEST CEMENT CO MOUNTAIN GATE	5A452008001	2	0
5R	ANDERSON CITY	ANDERSON WPCP	5A450100001	2	2
			Total	162	112

Regional Office	AGENCY	FACILITY	WDID	MMP Violations (Includes both confirmed and alleged MMP violations)	Violations Receiving Penalty (Does not include pending Penalties)
5S	RIO VISTA CITY	TRILOGY WWTP/NORTHWEST WWTP	5A480108001	499	7
5S	COLFAX CITY	COLFAX STP	5A310101001	472	222
5S	NEVADA CNTY SANITATION DISTRICT	CASCADE SHORES WWTP	5A290107002	398	332
5S	UNITED AUBURN INDIAN COMMUNITY	AUBURN RANCHERIA CASINO WWTP	5A31NP00001	318	316
5S	LIVE OAK, CITY OF	CITY OF LIVE OAK WWTP	5A510100001	293	293
5S	MANTECA CITY	MANTECA WW QUALITY CONTROL FAC	5B390104001	227	148
5S	CANADA COVE L.P.	FRENCH CAMP GOLF & RV PARK	5B391077001	186	0
5S	NEVADA CNTY SANITATION DISTRICT	LAKE WILDWOOD WWTP	5A290104001	150	0
5S	PLACER COUNTY DEPT OF FACILITY SERVICES	SA NO 28, ZONE NO.6	5A310104011	147	90
5S	WEST SACRAMENTO CITY	WEST SACRAMENTO STP	5B570103001	145	2
5S	PLACERVILLE CITY	HANGTOWN CREEK WWTP	5A090100001	136	6
5S	VACAVILLE CITY	EASTERLY STP	5A480105002	135	81

Regional Office	AGENCY	FACILITY	WDID	MMP Violations (Includes both confirmed and alleged MMP violations)	Violations Receiving Penalty (Does not include pending Penalties)
5S	COLUSA, CITY OF	COLUSA WWTP	5A060101001	99	12
5S	WILLIAMS CITY	WILLIAMS WWTP	5A060103001	95	0
5S	BRENTWOOD CITY	BRENTWOOD WWTP	5B070101001	93	93
5S	GALT CITY	GALT SD	5B340101001	90	0
5S	DONNER SUMMIT PUBLIC UTILITY	DONNER SUMMIT WWTP	5A290105001	77	73
5S	PLACER COUNTY DEPT OF FACILITY SERVICES	PLACER CNTY SMD NO 1 WWTP	5A310104007	74	4
5S	ROSEVILLE CITY	PLEASANT GROVE WWTP	5A310106007	72	0
5S	NEVADA CNTY SANITATION DISTRICT	LAKE OF THE PINES WWTP	5A290104003	62	0
5S	CA DEPT OF CORRECTIONS-DEUEL	DEUEL VOCATNL INST. STP	5B390100001	55	38
5S	UC DAVIS	UC DAVIS MAIN STP	5A570800001	54	10
5S	MODESTO CITY	GRAYSON PARK WELL NO.295	5C500117001	45	45
5S	SACRAMENTO CNTY AIRPORT	SACRAMENTO INTERNATIONAL AIRPT	5A34NP00004	41	40
5S	DAVIS CITY	DAVIS WWTP	5A570100001	36	0
5S	TURLOCK CITY	TURLOCK WWTP	5C500108001	36	0
5S	RIO VISTA CITY	RIO VISTA WWTF	5A480104001	35	15
5S	ROSEVILLE CITY	DRY CREEK WWTP	5A310106001	31	3
5S	CA DEPT OF CORRECTIONS-JAMESTOWN	SIERRA CONSERVATION CENTER WTP (NPDES)	5C550801002	30	30
5S	SACRAMENTO REGIONAL CSD	SACRAMENTO REGIONAL WWTP	5A340108002	18	0
5S	PROCTER AND GAMBLE COMPANY	PROCTER & GAMBLE CO WWTP	5A342004001	18	6
5S	CA DEPT OF GENERAL SERVICES REAL ESTATE	CENTRAL HEATING/COOLING FAC	5A340802001	15	15
5S	AUBURN CITY	AUBURN WWTP	5A310100001	14	0
5S	WOODLAND CITY	WOODLAND WWTP	5A570105001	14	0
5S	GAYLORD CONTAINER CORP	ANTIOCH PULP & PAPER MILL	5B072039001	14	14
5S	KINDER MORGAN ENERGY PTNRS,LP (5S)	ELMIRA REMEDIATION PROJECT	5A48NP00001	11	0
5S	COLLINS & AIKMAN PRODUCTS CO	FORMER WICKES FOREST INDUSTRIE	5A482016001	10	0
5S	JACKSON, CITY OF	CITY OF JACKSON WWTP	5B030103001	10	0
5S	HUNT-WESSON, INC.	HUNT-WESSON, INC.	5A572002001	9	6
5S	PLACER COUNTY DEPT OF FACILITY SERVICES	PLACER CNTY SMD NO 3	5A310104018	8	0
5S	CA DEPT OF FISH & GAME NIMBUS	NIMBUS HATCHERY	5A340801001	8	7
5S	SACRAMENTO COGENERATION AUTHORITY	SACRAMENTO COGEN AUTH PROJECT	5A342041001	8	8
5S	CALIF AMMONIA COMPANY	CALAMCO - STOCKTON TERMINAL	5B392095001	7	7

Regional Office	AGENCY	FACILITY	WDID	MMP Violations (Includes both confirmed and alleged MMP violations)	Violations Receiving Penalty (Does not include pending Penalties)
5S	BROWN SAND, INC.	OAKWOOD LAKE SUBDIVISION MINING RECLAMAT	5B392082001	6	0
5S	EL DORADO IRRIGATION DISTRICT	DEER CREEK WWTP	5B090102001	6	0
5S	LODI CITY	WHITE SLOUGH WATER POLLUTION CONTROL FAC	5B390103002	6	2
5S	MAXWELL P.U.D.	MAXWELL PUD WWTF	5A060102001	5	0
5S	NEVADA CITY	NEVADA CITY WWTP	5A290101001	5	0
5S	ORIGINAL SIXTEEN TO ONE MINE	SIXTEEN TO ONE MINE	5A462023001	5	0
5S	GWF POWER SYSTEMS, L.P.	GWF POWER SYSTEMS, SITE IV	5B072050003	5	5
5S	CA DEPT OF GENERAL SERVICES REAL ESTATE	STATE PRINTING & WAREHOUSES	5A340805001	4	0
5S	TRACY CITY	TRACY WWTP	5B390108001	4	4
5S	MODESTO CITY	MODESTO WATER QUALITY CTRL FAC	5C500102001	3	0
5S	MIRANT DELTA LLC	CONTRA COSTA POWER PLT ANTIOCH	5B072014008	2	0
5S	PLACERVILLE CITY	PLACERVILLE CITY HANGTOWN CREE	5A090100001	2	0
5S	CA DEPT OF FISH & GAME NIMBUS	MOKELUMNE RIVER FISH HATCHERY	5B390800001	1	0
5S	GRASS VALLEY CITY	GRASS VALLEY STP	5A290100001	1	0
5S	KINDER MORGAN ENERGY PTNRS,LP (5S)	FOX RD PIPELINE RELEASE SITE	5A48NP00004	1	0
5S	MODESTO ID	MODESTO ID REGIONAL WTP	5C500114003	1	0
5S	SACRAMENTO REGIONAL CSD-ELK GV	WALNUT GROVE WWTP (CSD1)	5A340107010	1	0
5S	EAST BAY MUD	CAMANCHE DAM POWER HOUSE	5B390114001	1	1
5S	HERMAN & HELENS MARINA	HERMAN & HELENS MARINA	5B39NP00035	1	1
5S	SACRAMENTO CNTY SOLID WASTE MANAGEMENT	KIEFER LANDFILL GW TREATMENT	5A340311002	1	1
5S	STOCKTON CITY	IVANO LANE	5B39NP00034	1	1
			Total	4357	1938

Regional Office	AGENCY	FACILITY	WDID	MMP Violations (Includes both confirmed and alleged MMP violations)	Violations Receiving Penalty (Does not include pending Penalties)
6B	CA DEPT OF FISH & GAME REGION 6	HOT CREEK HATCHERY NPDES	6B260801001	8	0
6B	ALPERS TROUT LLC	ALPERS TROUT LLC	6B269907002	5	5

Regional Office	AGENCY	FACILITY	WDID	MMP Violations (Includes both confirmed and alleged MMP violations)	Violations Receiving Penalty (Does not include pending Penalties)
6B	VICTOR VALLEY WASTEWATER RECLAMATION AUT	VICTOR VALLEY MUNI WTP	6B360109001	2	0
			Total	15	5

Regional Office	AGENCY	FACILITY	WDID	MMP Violations (Includes both confirmed and alleged MMP violations)	Violations Receiving Penalty (Does not include pending Penalties)
7	COACHELLA SD	COACHELLA SD WWTP	7A330104012	258	207
7	NILAND SD	NILAND SD WWTP	7A130109011	91	42
7	BRAWLEY CITY	BRAWLEY CITY WWTP	7A130100011	75	27
7	CALIPATRIA CITY	CALIPATRIA CITY WWTP	7A130102041	74	29
7	SEELEY CNTY WD	SEELEY CWD WWTP	7A130111013	69	7
7	ORMAT NEVADA, INC.	HEBER GEOTHERMAL FACILITY	7A132160001	35	35
7	IMPERIAL CITY	IMPERIAL CITY WWTP	7A130106011	31	25
7	PETER M. ORMAND	PETER M ORMAND DATE GARDENS MHP	7A131057011	23	0
7	CA DEPT OF CORRECTIONS	CA DEPT OF CORRECTIONS CENTINELA WWTP	7A131337001	21	15
7	ORMAT NEVADA, INC.	SECOND IMPERIAL GEOTHERMAL FACILITY	7A132210001	19	19
7	EL CENTRO CITY	EL CENTRO CITY WWTP	7A130103011	18	10
7	IMPERIAL ID	IMPERIAL ID GRASS CARP HATCHERY	7A130128015	12	8
7	WESTMORLAND CITY	WESTMORLAND CITY WWTP	7A130112012	10	8
7	RALPH BEATTY	COUNTRY LIFE MHPRV ASSET PARTNERS LP WWT	7A131001011	9	0
7	HOLTVILLE CITY	HOLTVILLE CITY WWTP	7A130105011	8	0
7	VALLEY SD	VALLEY SD WWTP	7A330122021	5	2
7	MCCABE USD	MCCABE USD WWTP	7A130114011	5	5
7	ORMAT NEVADA INC	SECOND IMPERIAL GEOTHERMAL FACILITY	7A132210001	4	1
7	IMPERIAL CCD	IMPERIAL CCD WWTP	7A130113011	4	3
7	CALEXICO CITY	CALEXICO CITY WWTP	7A130101011	4	4
			Total	775	447

Regional Office	AGENCY	FACILITY	WDID	MMP Violations (Includes both confirmed and alleged MMP violations)	Violations Receiving Penalty (Does not include pending Penalties)
8	YUCAIPA VALLEY WATER DIST	HENRY N. WOCHHOLZ WWRF	8 362222001	590	586
8	CORONA CITY	CORONA CITY STP NO. 1	8 330108001	336	309
8	RIALTO CITY	RIALTO CITY STP	8 360112001	228	88
8	WESTERN RIVERSIDE CNTY REGIONAL WASTEWAT	STP,NORCO	8 332353001	210	206
8	INLAND EMPIRE UTILITIES AGENCY	IEUA REGIONAL PLANT NO. 1 & 4	8 360104004	92	84
8	COLTON/SAN BERNARDINO RTT&WRA	COLTON/SAN BERNADINO STP, RIX	8 362375001	52	52
8	IRVINE RANCH WATER DIST	MICHELSON WASTEWATER RECLAMATION FACILIT	8 302006002	40	16
8	LEE LAKE WATER DISTRICT	LEE LAKE WD REGIONAL PLANT	8 332253001	35	0
8	JURUPA COMMUNITY SERVICES DIST	JURUPA CMSD STP INDIAN HILLS	8 330107002	31	0
8	EASTERN MUNICIPAL WATER DIST	STP,LIVE STREAM-ALL PLANTS	8 332303001	30	30
8	BIG BEAR AREA REGIONAL WW AGENCY	STP,BB LAKE & BB CITY	8 360108001	9	0
8	INLAND EMPIRE UTILITIES AGENCY	IEUA CARBON CANYON WATER RECLAMATION FAC	8 362283001	4	4
8	CORONA CITY	CORONA CITY STP NO. 3	8 332476001	3	0
8	ROBERTSONS READY MIX	ROBERTSONS READY MIX STAR BATC	8 301011160	2	0
8	SAN BERNARDINO CITY MUNICIPAL WATER DEPT	STP,SAN BERNARDINO	8 360114003	1	0
8	SUNKIST GROWERS, INC	ORANGE PRODUCTS DIVISION	8 362038001	1	0
8	TE VELDE, KEN	KEN TE VELDE DAIRY, GRAPEWIN	8 335656001	1	0
8	UNITED PARCEL SERVICE	STORM, ONTARIO	8 362368001	1	0
8	ADAMS STEEL	ADAMS STEEL SALVAGE	8 302741001	1	1
			Total	1667	1376

Regional Office	AGENCY	FACILITY	WDID	MMP Violations (Includes both confirmed and alleged MMP violations)	Violations Receiving Penalty (Does not include pending Penalties)
9	ESCONDIDO CITY	HARRF DISCH TO SAN ELIJO OO	9 000000031	392	392
9	FALLBROOK PUBLIC UTILITY DIST	FALLBROOK PUD,OCEANSIDE OCN OF	9 000000115	56	54
9	SAN DIEGO COUNTY WATER AUTHORITY	SAN VICENTE PIPELINE PROJECT	9 000001414	39	39
9	SAN DIEGO, CITY OF	SAN DIEGO CITY CONVENTION CENTER DEWATER	9 000000329	29	22

Regional Office	AGENCY	FACILITY	WDID	MMP Violations (Includes both confirmed and alleged MMP violations)	Violations Receiving Penalty (Does not include pending Penalties)
9	FALLBROOK PUBLIC UTILITY DIST	FALLBROOK PLANT 1,OCEANSIDE OF	9 000000115	18	0
9	SAN DIEGO CITY	POINT LOMA OCEAN OUTFALL	9 000000275	14	14
9	SOCWA-SAN JUAN CREEK OCEAN O/F	SMWD-CHIQUITA WRP	9 000000175	11	0
9	ESCONDIDO CITY	HARRF DISCH TO ESCONDIDO CREEK	9 000000833	11	11
9	PROMENADE MALL DEVELOPMT CORP	PROMENADE AT PACIFIC BCH DEWAT	9 000000588	9	0
9	SEA WORLD, INC	SEAWORLD, SAN DIEGO	9 000000083	8	8
9	SOCWA-SAN JUAN CREEK OCEAN O/F	SOUTH COAST WATER DISTRICT GROUNDWATER R	9 000000175	7	0
9	SAN ELIJO JOINT POWERS	SAN ELIJO WPCF	9 000000125	4	0
9	SOCWA-SAN JUAN CREEK OCEAN O/F	SOCWA SAN JUAN CREEK OCEAN O/F	9 000000175	4	2
9	SOCWA-SAN JUAN CREEK OCEAN O/F	SOCWA SAN JUAN CREEK OCEAN O/F	9 0000175S1	4	2
9	SOCWA-SAN JUAN CREEK OCEAN O/F	SOCWA SAN JUAN CREEK OCEAN O/F	9 0000175S2	4	2
9	SOCWA-SAN JUAN CREEK OCEAN O/F	SOCWA SAN JUAN CREEK OCEAN O/F	9 0000175S4	4	2
9	SOCWA-SAN JUAN CREEK OCEAN O/F	SOCWA SAN JUAN CREEK OCEAN O/F	9 0000175S5	4	2
9	SOCWA-SAN JUAN CREEK OCEAN O/F	SOCWA SAN JUAN CREEK OCEAN O/F	9 0000175S6	4	2
9	SOCWA-ALISO CREEK OCEAN O/F	SOCWA ALISO CREEK OCEAN OUTFALL	9 000000117	3	3
9	SOUTHERN CALIFORNIA EDISON CO	SONGS UNIT 1	9 000000086	3	3
9	SOCWA-SAN JUAN CREEK OCEAN O/F	CITY OF SAN JUAN CAPISTRANO REVERSE OSMO	9 000000175	2	0
9	SOCWA-SAN JUAN CREEK OCEAN O/F	SAN CLEMENTE WRP	9 000000175	2	0
9	PADRE DAM MWD	PADRE DAM WRF	9 000000053	1	0
9	AMERICA PLAZA OWNERS ASSOC	ONE AMERICA PLAZA DEWATER	9 000000469	1	1
9	SOUTHWEST MARINE, INC	SOUTHWEST MARINE SHIPYARD	9 000000137	1	1
			Total	635	560