



California Regional Water Quality Control Board
Lahontan Region



Linda S. Adams
Acting Secretary for
Environmental Protection

2501 Lake Tahoe Boulevard, South Lake Tahoe, California 96150
(530) 542-5400 • Fax (530) 544-2271
www.waterboards.ca.gov/lahontan

Edmund G. Brown Jr.
Governor

January 5, 2011

CERTIFIED MAIL: 7008 1300 0001 6173 9899

Randy O'Hearn, General Manager
Susanville Sanitary District
P.O. Box 152
Susanville, CA 96130

COMPLAINT NO. R6T-2011-0002, ISSUED TO THE SUSANVILLE SANITARY DISTRICT FOR MANDATORY MINIMUM PENALTIES, SUSANVILLE SANITARY DISTRICT WASTEWATER TREATMENT PLANT, SUSANVILLE, LASSEN COUNTY - WDID NO. 6A181554001

Attached is *Administrative Civil Liability Complaint for Mandatory Minimum Penalties No. R6T-2010-0002* (Complaint). The Complaint contains allegations that the Susanville Sanitary District (District) violated effluent limitations specified by Board Order No. R6T-2008-0022, National Pollutant Discharge Elimination System Permit No. CA0102695. Attachment A of the Complaint specifies the dates and nature of the violations. In the Complaint, Lahontan Water Board staff proposes that the District be assessed mandatory minimum penalties in the amount of **four hundred fifty-three thousand dollars (\$453,000)**.

Waiver of Hearing

Pursuant to Water Code section 13323, the Water Board will hold a hearing on the Complaint no later than 90 days after it is served. The District may elect to waive its right to a hearing before the Water Board and agree to pay the proposed liability. Waiver of the hearing constitutes acceptance of the assessment of civil liability in the amount of \$453,000, as set forth in the Complaint. If the District wishes to exercise this option, it must complete the following:

By 5:00 p.m., January 31, 2011, an authorized agent must sign the enclosed waiver form and submit it to the Lahontan Water Board's South Lake Tahoe office at the following address:

Lahontan Regional Water Quality Control Board
Attn: Lauri Kemper, Assistant Executive Officer
2501 Lake Tahoe Blvd.
South Lake Tahoe, CA 96150

Please note that the District's waiver and agreement to pay the proposed liability constitutes a proposed settlement, which will not be effective until reasonable opportunity for public participation has been provided pursuant to Code of Federal Regulations, title 40, section 123.27(d)(2)(iii) and the State Water Resources Control Board's 2010 Enforcement Policy. The Lahontan Water Board will notify interested persons of any proposed settlement and will solicit comments on the settlement for a period of thirty (30) days. Any settlement will not become final until after a public comment period.

As described in the enclosed waiver form, Lahontan Water Board staff may withdraw the Complaint and issue a new complaint should new information be received during the comment period. If no information is received that causes Water Board staff to withdraw the Complaint, the Lahontan Water Board's Executive Officer will review the settlement for approval, or for recommending it be heard by the Lahontan Water Board for approval at a future meeting. Payment of the liability will be due within 30 days of the settlement becoming final. Payment must be made with a cashier's check or money order and made payable to the *State Water Pollution Cleanup and Abatement Account*.

Public Hearing

Alternatively, if the District elects to proceed to a public hearing, a hearing is tentatively scheduled to be held at the Lahontan Water Board meeting on **March 9 and 10, 2011**. The meeting is scheduled to convene at a time and location as announced in the Lahontan Water Board meeting agenda. The agenda will be issued at least ten days before the meeting and will be posted on the Lahontan Water Board web page at **www.waterboards.ca.gov/lahontan**. At that time, the Lahontan Water Board will accept testimony and public comment and decide whether to affirm, reject, or modify the proposed liability, or whether to refer the matter for judicial civil action.

To ensure the Lahontan Water Board has the opportunity to fully consider written comments, all comments must be submitted in accordance with the deadlines identified in the hearing procedures that will be sent to you under separate cover. Written objections and materials submitted after the deadlines specified in the hearing procedures will not be accepted, except at the discretion of the Lahontan Water Board Chair. Untimely written material or objections will not be accepted or incorporated into the record if doing so would prejudice the Lahontan Water Board or any Designated Party. The Chair may choose to modify this rule upon a showing of severe hardship. (Cal Code Regs., title 23, sections 648.1 and 648.4.) Any person seeking to submit late written materials must justify why the materials could not have been submitted earlier.

Lahontan Water Board staff understands that the District would like the Lahontan Water Board to require the District to complete a compliance project designed to correct the violations in lieu of assessing mandatory minimum penalties, in accordance with Water Code section 13385, subdivision (k). Lahontan Water Board staff further understands that the District is planning a compliance project consisting of treatment plant upgrades where the cost to implement such a project exceeds the proposed penalty. To consider

such a compliance project, the Lahontan Water Board will need information regarding the following: (1) the compliance project is designed to correct the violations alleged in the Complaint within five years, (2) the compliance project is in accordance with the Enforcement Policy of the State Water Resources Control Board, and (3) the District has prepared a financing plan to complete the compliance project. This information must be submitted within 60 days of the date of the Complaint.

Please contact State Water Resources Control Board Office of Enforcement Attorney Mayumi Okamoto at (916) 341-5674, or Lahontan Water Board staff members Taylor Zentner at (530) 542-5469 or Scott C. Ferguson at (530) 542-5432, if you have any questions concerning this matter.



LAURI KEMPER, P.E.
ASSISTANT EXECUTIVE OFFICER

- Enclosures: 1. Complaint No. R6T-2011-0002
 2. Waiver Form

cc (with enclosures): Harold J. Singer, Executive Officer/Lahontan Water Board
 Chuck Curtis, Division Manager/Lahontan Water Board
 Kim Niemeyer, Staff Counsel/SWRCB, Office of Chief Counsel
 Mayumi Okamoto, Staff Counsel/SWRCB, Office of Enforcement
 Ann Carroll, Staff Counsel/SWRCB, Office of Enforcement
 Mark Bradley/SWRCB, Office of Enforcement
 Ken Greenberg/U.S. Environmental Protection Agency, Region 9
 Fatima Ty/U.S. Environmental Protection Agency, Region 9
 Phil Isorena, NPDES Program Manager/SWRCB
 Alan Jones, Director/Lassen County Environmental Health Dept.

TBZ/clhT: Susanville SD MMP ACL Cover Letter (12-15-10)
File Under: SLT File Room, WDID NO. 6A181554001
VVL File Room, WDID NO. 6A181554001



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Lahontan Region**



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Acting Secretary for
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**STATE OF CALIFORNIA
REGIONAL WATER QUALITY CONTROL BOARD
LAHONTAN REGION**

**In the Matter of Susanville Sanitary
District: Violation of Effluent
Limitations Contained in Board Order
No. R6T-2008-0022 for the Susanville
Sanitary District Wastewater Treatment
Plant, Susanville, Lassen County,
WDID No. 6A181554001**

**) COMPLAINT NO.
) R6T-2011-0002
) FOR MANDATORY
) ADMINISTRATIVE CIVIL
) LIABILITY**

This Complaint to assess mandatory minimum penalties pursuant to California Water Code (Water Code) section 13385, subsections (h) and (i) is issued to the Susanville Sanitary District (Discharger) based on findings of violations of Waste Discharge Requirements specified for Susanville Sanitary District Wastewater Treatment Plant (Facility) by the California Regional Water Quality Control Board, Lahontan Region (Lahontan Water Board), Board Order No. R6T-2008-0022, National Pollutant Discharge Elimination System (NPDES) Permit No. CA0102695.

The Assistant Executive Officer of the Lahontan Water Board finds the following:

1. On July 23, 2008, the Lahontan Water Board adopted Board Order No. R6T-2008-0022, NPDES Permit No. CA0102695.
2. Water Code section 13385(h)(1) requires the Lahontan Water Board to assess a mandatory minimum penalty of three thousand dollars (\$3,000) for each **serious violation**.
3. Water Code section 13385(h)(2) provides that a **serious violation** occurs if a waste discharge exceeds the effluent limitations contained in the applicable waste discharge requirements (a) by 40 percent or more for a Group I pollutant, as specified in Appendix A to section 123.45 of title 40, Code of Federal Regulations, or (b) by 20 percent or more for a Group II pollutant, as specified in Appendix A to section 123.45 of title 40, Code of Federal Regulations.
4. Water Code section 13385(i) requires the Lahontan Water Board to assess a mandatory minimum penalty of three thousand dollars (\$3,000) for each violation, not counting the first three violations, if the discharger does any of the following four or more times in a period of six consecutive months (**chronic violations**):
 - a. violates a waste discharge requirement effluent limitation;
 - b. fails to file a report pursuant to Water Code section 13260;

- c. files an incomplete report pursuant to Water Code section 13260; or
 - d. violates a toxicity effluent limitation contained in the applicable waste discharge requirements where the waste discharge requirements do not contain pollutant-specific effluent limitations for toxic pollutants.
5. Water Code section 13385(i)(2) defines a "period of six consecutive months" as, "... the period commencing on the date that one of the violations described in this subdivision [Water Code section 13385(i), Finding No. 4 of this Complaint] occurs and ending 180 days after that date." However, **serious violations** may qualify as chronic violations for the purposes of determining a "period of six consecutive months," and may count as the first three **chronic violations**, though such violations are not counted twice for the purpose of assessing the penalty amount.
6. Total suspended solids is a Group I pollutant.
7. Total coliform bacteria and pH are pollutants that are not identified as Group I or Group II pollutants.
8. The NPDES Permit includes the following discharge specifications:
- a. Section IV.A.1.c requires wastewater discharged from the Facility not to exceed the following effluent limits for **total suspended solids (TSS)** at Discharge Point 001/Monitoring Location EFF-001:
 - i. 30 milligrams per liter (mg/L) - Average monthly
 - ii. 45 mg/L - Average weekly
 - iii. 500 pounds per day (Lbs/day) - Average Monthly
 - iv. 751 Lbs/day - Average Weekly
 - b. Section IV.A.1.c requires wastewater discharged from the Facility not to exceed the following effluent limits for **pH** at Discharge Point 001/Monitoring Location EFF-001:
 - i. 6.5 - Instantaneous minimum
 - ii. 8.5 - Instantaneous maximum
 - c. Section IV.A.2 requires wastewater discharged from the Facility not to exceed the following effluent limits for **total coliform bacteria** at Monitoring Location EFF-002:
 - i. 23 Most Probable Number (MPN)/100 milliliters (mL) - Median concentration using the bacteriological results of the last seven days for which analyses have been completed
 - ii. 240 MPN/100 mL - Total coliform concentration not to be exceeded in more than one sample in any 30-day period.
9. According to data provided in self-monitoring reports submitted by the Discharger, the Discharger violated the NPDES Permit effluent limitations, as shown in the Table of

Violations provided in Attachment A, which is made a part of this Complaint by this reference.

10. According to the definitions of **serious violations** in Finding No. 3, the Discharger committed 10 serious violations, as shown by the Table of Violations provided in Attachment A of this Complaint. The amount of the mandatory minimum penalty for the 10 serious violations (\$3,000 for each of the 10 violations) is thirty thousand dollars (\$30,000).
11. According to the definition of **chronic violations** in Finding No. 4, the Discharger committed 151 chronic violations, as shown by the Table of Violations provided in Attachment A of this Complaint. Ten (10) of these violations also constitute **serious violations** as noted in Finding No. 3. However, these ten violations do not result in double penalties. The 151 **chronic violations** less the ten **serious violations** to avoid double penalty results in 141 remaining **chronic violations**. The amount of the mandatory minimum penalty for the 141 remaining **chronic violations** (\$3,000 for each of the 141 violations) is four hundred twenty-three thousand dollars (\$423,000).
12. The total amount of the mandatory minimum penalty is (\$30,000 + \$423,000) four hundred fifty-three thousand dollars (\$453,000). This Complaint only addresses administrative civil liability for violations subject to mandatory minimum penalties that are specifically identified in Attachment A.
13. Issuance of this Complaint is exempt from the provisions of the California Environmental Quality Act (Public Resources Code section 21000, et seq.) in accordance with the California Code of Regulations title 14, chapter 3, section 15321.

THE SUSANVILLE SANITARY DISTRICT IS HEREBY GIVEN NOTICE THAT:

1. The Assistant Executive Officer of the Lahontan Water Board proposes that the Discharger be assessed a mandatory minimum penalty in the amount of **four hundred fifty-three thousand dollars (\$453,000)**, pursuant to Water Code section 13385.
2. The Lahontan Water Board will hold a public hearing on this matter at its **March 9 and 10, 2011** meeting, unless the Discharger agrees to waive its right to a public hearing by filling out, signing, and submitting the enclosed "Waiver of Hearing." If the Discharger chooses not to waive its right to a public hearing, the Lahontan Water Board may proceed with the scheduled public hearing and consider testimony received from interested persons during the public hearing and decide whether to accept the amount of proposed mandatory minimum penalty. The Lahontan Water Board may also decide to continue the matter to a future hearing, direct the Assistant Executive Officer to reissue the Complaint to propose additional penalties under Water Code section 13385(c) and (e), or refer the matter to the California Attorney General. The public hearing is set for the regularly-scheduled Lahontan Water Board meeting on **March 9 and 10, 2011**, in Barstow, California. A notice of the location and time of the meeting will be provided no less than 10 days before the meeting.

3. Notwithstanding the issuance of this Complaint, the Lahontan Water Board shall retain the authority to assess additional penalties for violations of the requirements of the Discharger's waste discharge requirements for which penalties have not yet been assessed or for violations that may subsequently occur.


WAIVER OF HEARING

You may waive the right to a hearing. Waiver of your right to a hearing constitutes acceptance of the assessment of civil liability in the amount set forth within the Complaint. If you wish to waive your right to a hearing, an authorized person must sign the Waiver of Hearing form prepared for this Complaint, and submit it to the address below.

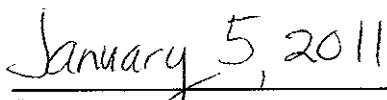
Lahontan Regional Water Quality Control Board
Attn: Lauri Kemper, Assistant Executive Officer
2501 Lake Tahoe Boulevard
South Lake Tahoe, CA 96150

Please note that any settlement will not be effective until reasonable opportunity for public participation has been provided pursuant to Code of Federal Regulations, title 40, section 123.27(d)(2)(iii) and the State Water Resources Control Board's 2010 Enforcement Policy. The Lahontan Water Board will notify interested persons of any proposed settlement and will solicit comments on the settlement for a period of thirty (30) days. Any settlement will not become final until after a public comment period.

Payment of the liability will be due within 30 days of the settlement becoming final. Payment must be made with a cashier's check or money order and made payable to the *State Water Pollution Cleanup and Abatement Account*.



LAURI KEMPER, P.E.
ASSISTANT EXECUTIVE OFFICER



Date

Attachment: A - Table of Violations

**WAIVER FORM
FOR ADMINISTRATIVE CIVIL LIABILITY COMPLAINT**

By signing this waiver, I affirm and acknowledge the following:

I am duly authorized to represent Susanville Sanitary District (hereinafter "Discharger") in connection with Administrative Civil Liability Complaint No. R6T-2010-0002 (hereinafter the "Complaint"). I am informed that California Water Code section 13323, subdivision (b), states that, "a hearing before the regional board shall be conducted within 90 days after the party has been served [with the complaint]. The person who has been issued a complaint may waive the right to a hearing."

(OPTION 1: Check here if the Dischargers waive the hearing requirement and will pay the liability.)

- a. I hereby waive any right the Discharger may have to a hearing before the Lahontan Water Board.
- b. I certify that the Discharger will remit payment for the civil liability imposed in the total amount of **four hundred fifty-three thousand dollars (\$453,000)** by check that references "ACL Complaint No. R6T-2010-0002" made payable to the "State Water Pollution Cleanup and Abatement Account."
- c. I understand the payment of the above amount constitutes a proposed settlement of the Complaint, and that any settlement will not become final until after the 30-day public notice and comment period mandated by Federal regulations (40 CFR 123.27) expires. Should the Lahontan Water Board receive significant new information or comments from any source (excluding the Water Board's Prosecution Team) during this comment period, the Complaint may be withdrawn, and a new complaint issued. I understand that this proposed settlement is subject to approval by the Lahontan Water Board or its Executive Officer, and that the Lahontan Water Board may consider this proposed settlement in a public meeting or hearing. I also understand that approval of the settlement will result in the Discharger having waived the right to contest the allegations in the Complaint and the imposition of civil liability. Payment of four hundred fifty-three thousand dollars (\$453,000) will be due within 30 days of the settlement becoming final after the settlement receives Lahontan Water Board approval.
- d. I understand that payment of the above amount is not a substitute for compliance with applicable laws and that continuing violations of the type alleged in the Complaint may subject the Discharger to further enforcement, including additional civil liability.

(OPTION 2: Check here if the Discharger waives the 90-day hearing requirement in order to extend the hearing date and/or hearing deadlines.)

I hereby waive any right the Discharger may have to a hearing before the Lahontan Water Board within 90 days after service of the Complaint, but I intend to request a hearing in the future. By checking this box, the Discharger requests that the Lahontan Water Board delay the hearing and/or hearing deadlines so that the Discharger may have additional time to prepare for the hearing. It remains within the discretion of the Lahontan Water Board to agree to delay the hearing.

- (OPTION 3: Check here if the Discharger waives the 90-day hearing requirement in order to engage in settlement discussions including any proposals for a compliance project.)**

I hereby waive any right the Discharger may have to a hearing before the Lahontan Water Board within 90 days after service of the Complaint, but I reserve the ability to request a hearing in the future. I certify that the Discharger will promptly engage the Lahontan Water Board Prosecution Team in settlement discussions to attempt to resolve the outstanding violation(s). By checking this box, the Discharger requests that the Lahontan Water Board delay the hearing so that the Discharger and the Prosecution Team can discuss settlement. It remains within the discretion of the Lahontan Water Board to agree to delay the hearing. Any proposed settlement, including but not limited to a Compliance Project, is subject to the conditions described above under "Option 1."

(Print Name and Title)

(Signature)

(Date)

Susanville Sanitary District Wastewater Treatment Plant
Table of Effluent Limit Violations

No.	Violation Date	Violation Type	Monitoring Location	Parameter Effluent Limit	Analytical Results	MMP
1	9/3/2008		EFF-002	Total Coliform 7-day Median ≤ 23 MPN/100mL	50 MPN/100mL	0
2	9/4/2008		EFF-001	pH Instantaneous Maximum ≤ 8.5	8.9	0
3	9/8/2008		EFF-001	pH Instantaneous Maximum ≤ 8.5	8.7	0
4	9/10/2008	Chronic	EFF-001	pH Instantaneous Maximum ≤ 8.5	8.6	1
5	9/11/2008	Chronic	EFF-001	pH Instantaneous Maximum ≤ 8.5	8.6	1
6	9/11/2008	Chronic	EFF-002	Total Coliform 7-day Median ≤ 23 MPN/100mL	50 MPN/100mL	1
7	9/13/2008	Chronic	EFF-001	Total Suspended Solids Weekly Average ≤ 45 mg/L	50 mg/L	1
8	9/16/2008	Chronic	EFF-002	Total Coliform No more than one sample over 240 MPN/100 mL in a 30-day period	Sept. 11: 81,000 MPN/100 mL Sept. 16: 1,400 MPN/100 mL	1
9	9/16/2008	Chronic	EFF-002	Total Coliform 7-day Median ≤ 23 MPN/100mL	50 MPN/100mL	1
10	9/23/2008	Chronic	EFF-002	Total Coliform 7-day Median ≤ 23 MPN/100mL	140 MPN/100mL	1
11	9/30/2008	Chronic	EFF-001	Total Suspended Solids Monthly Average ≤ 30 mg/L	37.8 mg/L	1
12	10/1/2008	Chronic	EFF-002	Total Coliform 7-day Median ≤ 23 MPN/100mL	50 MPN/100mL	1
13	10/4/2008	Chronic	EFF-001	Total Suspended Solids Weekly Average ≤ 45 mg/L	52 mg/L	1
14	10/8/2008	Chronic	EFF-002	Total Coliform 7-day Median ≤ 23 MPN/100mL	80 MPN/100mL	1
15	10/11/2008	Chronic	EFF-001	Total Suspended Solids Weekly Average ≤ 45 mg/L	48 mg/L	1
16	10/15/2008	Chronic	EFF-002	Total Coliform No more than one sample over 240 MPN/100 mL in a 30-day period	Sept. 16: 1,400 MPN/100 mL Oct. 15: 2,700 MPN/100 mL	1
17	10/15/2008	Chronic	EFF-002	Total Coliform 7-day Median ≤ 23 MPN/100mL	140 MPN/100mL	1
18	10/22/2008	Chronic	EFF-002	Total Coliform No more than one sample over 240 MPN/100 mL in a 30-day period	Oct. 15: 2,700 MPN/100 mL Oct. 22: 360 MPN/100mL	1

Attachment A

Susanville Sanitary District Wastewater Treatment Plant
Table of Effluent Limit Violations

No.	Violation Date	Violation Type	Monitoring Location	Parameter Effluent Limit	Analytical Results	MMP
19	10/22/2008	Chronic	EFF-002	Total Coliform 7-day Median ≤ 23 MPN/100mL	360 MPN/100mL	1
20	10/29/2008	Chronic	EFF-002	Total Coliform No more than one sample over 240 MPN/100 mL in a 30-day period	Oct. 22: 360 MPN/100mL Oct. 29: 940 MPN/100 mL	1
21	10/29/2008	Chronic	EFF-002	Total Coliform 7-day Median ≤ 23 MPN/100mL	360 MPN/100mL	1
22	10/31/2008	Chronic	EFF-001	Total Suspended Solids Monthly Average ≤ 30 mg/L	35 mg/L	1
23	11/4/2008	Chronic	EFF-002	Total Coliform 7-day Median ≤ 23 MPN/100mL	140 MPN/100mL	1
24	11/12/2008	Chronic	EFF-002	Total Coliform No more than one sample over 240 MPN/100 mL in a 30-day period	Oct. 29: 940 MPN/100 mL Nov. 12: 640 MPN/100 mL	1
25	11/12/2008	Chronic	EFF-002	Total Coliform 7-day Median ≤ 23 MPN/100mL	360 MPN/100mL	1
26	11/19/2008	Chronic	EFF-002	Total Coliform 7-day Median ≤ 23 MPN/100mL	360 MPN/100mL	1
27	11/22/2008	Chronic	EFF-001	Total Suspended Solids Weekly Average ≤ 45 mg/L	47 mg/L	1
28	11/25/2008	Chronic	EFF-002	Total Coliform 7-day Median ≤ 23 MPN/100mL	360 MPN/100mL	1
29	12/3/2008	Chronic	EFF-002	Total Coliform 7-day Median ≤ 23 MPN/100mL	100 MPN/100mL	1
30	12/9/2008	Chronic	EFF-002	Total Coliform 7-day Median ≤ 23 MPN/100mL	92 MPN/100mL	1
31	12/17/2008	Chronic	EFF-002	Total Coliform 7-day Median ≤ 23 MPN/100mL	90 MPN/100mL	1
32	12/23/2008	Chronic	EFF-002	Total Coliform 7-day Median ≤ 23 MPN/100mL	90 MPN/100mL	1
33	12/27/2008	Serious* and Chronic	EFF-001	Total Suspended Solids Weekly Average ≤ 45 mg/L	73 mg/L	1
34	12/31/2008	Chronic	EFF-002	Total Coliform 7-day Median ≤ 23 MPN/100mL	90 MPN/100mL	1
35	12/31/2008	Chronic	EFF-001	Total Suspended Solids Monthly Average ≤ 30 mg/L	32 mg/L	1
36	1/7/2009	Chronic	EFF-002	Total Coliform 7-day Median ≤ 23 MPN/100mL	78 MPN/100mL	1

Susanville Sanitary District Wastewater Treatment Plant
Table of Effluent Limit Violations

No.	Violation Date	Violation Type	Monitoring Location	Parameter Effluent Limit	Analytical Results	MMP
37	1/13/2009	Chronic	EFF-002	Total Coliform No more than one sample over 240 MPN/100 mL in a 30-day period	Dec. 31: 500 MPN/100 mL Jan. 13: 940 MPN/100 mL	1
38	1/13/2009	Chronic	EFF-002	Total Coliform 7-day Median \leq 23 MPN/100mL	90 MPN/100mL	1
39	1/22/2009	Chronic	EFF-002	Total Coliform 7-day Median \leq 23 MPN/100mL	78 MPN/100mL	1
40	1/28/2009	Chronic	EFF-002	Total Coliform No more than one sample over 240 MPN/100 mL in a 30-day period	Jan. 13: 940 MPN/100 mL Jan. 28: 3,400 MPN/100 mL	1
41	1/28/2009	Chronic	EFF-002	Total Coliform 7-day Median \leq 23 MPN/100mL	78 MPN/100mL	1
42	2/4/2009	Chronic	EFF-002	Total Coliform No more than one sample over 240 MPN/100 mL in a 30-day period	Jan. 28: 3,400 MPN/100 mL Feb. 4: 600 MPN/100 mL	1
43	2/4/2009	Chronic	EFF-002	Total Coliform 7-day Median \leq 23 MPN/100mL	500 MPN/100mL	1
44	2/10/2009	Chronic	EFF-002	Total Coliform No more than one sample over 240 MPN/100 mL in a 30-day period	Feb. 4: 600 MPN/100 mL Feb. 10: 520 MPN/100 mL	1
45	2/10/2009	Chronic	EFF-002	Total Coliform 7-day Median \leq 23 MPN/100mL	520 MPN/100mL	1
46	2/14/2009	Chronic	EFF-001	Total Suspended Solids Weekly Average \leq 45 mg/L	59 mg/L	1
47	2/18/2009	Chronic	EFF-002	Total Coliform 7-day Median \leq 23 MPN/100mL	520 MPN/100mL	1
48	2/25/2009	Chronic	EFF-002	Total Coliform 7-day Median \leq 23 MPN/100mL	520 MPN/100mL	1
49	3/4/2009	Chronic	EFF-002	Total Coliform No more than one sample over 240 MPN/100 mL in a 30-day period	Feb. 10: 520 MPN/100 mL March 4: 540 MPN/100 mL	1
50	3/4/2009	Chronic	EFF-002	Total Coliform 7-day Median \leq 23 MPN/100mL	520 MPN/100mL	1
51	3/10/2009	Chronic	EFF-002	Total Coliform No more than one sample over 240 MPN/100 mL in a 30-day period	March 4: 540 MPN/100 mL March 10: 880 MPN/100 mL	1
52	3/10/2009	Chronic	EFF-002	Total Coliform 7-day Median \leq 23 MPN/100mL	540 MPN/100mL	1

Attachment A

Susanville Sanitary District Wastewater Treatment Plant

Table of Effluent Limit Violations

No.	Violation Date	Violation Type	Monitoring Location	Parameter Effluent Limit	Analytical Results	MMP
53	3/18/2009	Chronic	EFF-002	Total Coliform 7-day Median < 23 MPN/100mL	520 MPN/100mL	1
54	3/21/2009	Serious* and Chronic	EFF-001	Total Suspended Solids Weekly Average < 45 mg/L	81 mg/L	1
55	3/25/2009	Chronic	EFF-002	Total Coliform 7-day Median < 23 MPN/100mL	84 MPN/100mL	1
56	3/28/2009	Serious* and Chronic	EFF-001	Total Suspended Solids Weekly Average < 45 mg/L	77 mg/L	1
57	3/31/2009	Serious* and Chronic	EFF-001	Total Suspended Solids Monthly Average < 30 mg/L	55 mg/L	1
58	4/1/2009	Chronic	EFF-002	Total Coliform 7-day Median < 23 MPN/100mL	60 MPN/100mL	1
59	4/2/2009	Chronic	EFF-001	pH Instantaneous Maximum < 8.5	8.8	1
60	4/7/2009	Chronic	EFF-001	pH Instantaneous Maximum < 8.5	8.7	1
61	4/8/2009	Chronic	EFF-002	Total Coliform 7-day Median < 23 MPN/100mL	70 MPN/100mL	1
62	4/13/2009	Chronic	EFF-001	pH Instantaneous Maximum < 8.5	8.6	1
63	4/14/2009	Chronic	EFF-001	pH Instantaneous Maximum < 8.5	8.7	1
64	4/15/2009	Chronic	EFF-001	pH Instantaneous Maximum < 8.5	9.0	1
65	4/15/2009	Chronic	EFF-002	Total Coliform 7-day Median < 23 MPN/100mL	70 MPN/100mL	1
66	4/16/2009	Chronic	EFF-001	pH Instantaneous Maximum < 8.5	8.9	1
67	4/22/2009	Chronic	EFF-002	Total Coliform 7-day Median < 23 MPN/100mL	70 MPN/100mL	1
68	4/28/2009	Chronic	EFF-002	Total Coliform 7-day Median < 23 MPN/100mL	60 MPN/100mL	1
69	5/6/2009	Chronic	EFF-002	Total Coliform 7-day Median < 23 MPN/100mL	60 MPN/100mL	1
70	5/13/2009	Chronic	EFF-001	pH Instantaneous Maximum < 8.5	8.6	1
71	5/14/2009	Chronic	EFF-001	pH Instantaneous Maximum < 8.5	8.7	1

Susansville Sanitary District Wastewater Treatment Plant
Table of Effluent Limit Violations

No.	Violation Date	Violation Type	Monitoring Location	Parameter Effluent Limit	Analytical Results	MMP
72	5/14/2009	Chronic	EFF-002	Total Coliform 7-day Median \leq 23 MPN/100mL	70 MPN/100mL	1
73	5/20/2009	Chronic	EFF-002	Total Coliform 7-day Median \leq 23 MPN/100mL	70 MPN/100mL	1
74	5/28/2009	Chronic	EFF-002	Total Coliform 7-day Median \leq 23 MPN/100mL	160 MPN/100mL	1
75	5/31/2009	Chronic	EFF-001	Total Suspended Solids Monthly Average \leq 30 mg/L	30.5	1
76	6/4/2009	Chronic	EFF-002	Total Coliform 7-day Median \leq 23 MPN/100mL	160 MPN/100mL	1
77	6/10/2009	Chronic	EFF-002	Total Coliform 7-day Median \leq 23 MPN/100mL	34 MPN/100mL	1
78	6/18/2009	Chronic	EFF-002	Total Coliform 7-day Median \leq 23 MPN/100mL	34 MPN/100mL	1
79	6/25/2009	Chronic	EFF-002	Total Coliform 7-day Median \leq 23 MPN/100mL	34 MPN/100mL	1
80	7/1/2009	Chronic	EFF-002	Total Coliform 7-day Median \leq 23 MPN/100mL	32 MPN/100mL	1
81	7/7/2009	Chronic	EFF-001	pH Instantaneous Maximum \leq 8.5	8.7	1
82	7/8/2009	Chronic	EFF-001	pH Instantaneous Maximum \leq 8.5	8.8	1
83	7/8/2009	Chronic	EFF-002	Total Coliform 7-day Median \leq 23 MPN/100mL	32 MPN/100mL	1
84	7/9/2009	Chronic	EFF-001	pH Instantaneous Maximum \leq 8.5	9.1	1
85	7/10/2009	Chronic	EFF-001	pH Instantaneous Maximum \leq 8.5	9.1	1
86	7/13/2009	Chronic	EFF-001	pH Instantaneous Maximum \leq 8.5	8.8	1
87	7/14/2009	Chronic	EFF-001	pH Instantaneous Maximum \leq 8.5	8.9	1
88	7/15/2009	Chronic	EFF-001	pH Instantaneous Maximum \leq 8.5	8.7	1
89	7/16/2009	Chronic	EFF-001	pH Instantaneous Maximum \leq 8.5	8.8	1
90	7/17/2009	Chronic	EFF-001	pH Instantaneous Maximum \leq 8.5	8.7	1

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91	7/18/2009	Chronic	EFF-001	Total Suspended Solids Weekly Average < 45 mg/L	57 mg/L	1
92	7/20/2009	Chronic	EFF-001	pH Instantaneous Maximum < 8.5	8.7	1
93	7/23/2009	Chronic	EFF-001	pH Instantaneous Maximum < 8.5	8.8	1
94	7/31/2009	Chronic	EFF-001	Total Suspended Solids Monthly Average < 30 mg/L	41.8 mg/L	1
95	8/5/2009	Chronic	EFF-002	Total Coliform 7-day Median < 23 MPN/100mL	50 MPN/100mL	1
96	8/12/2009	Chronic	EFF-002	Total Coliform No more than one sample over 240 MPN/100 mL in a 30-day period	July 29: 3,100 MPN/100 mL August 12: 500 MPN/100 mL	1
97	8/12/2009	Chronic	EFF-002	Total Coliform 7-day Median < 23 MPN/100mL	50 MPN/100mL	1
98	8/19/2009	Chronic	EFF-002	Total Coliform 7-day Median < 23 MPN/100mL	50 MPN/100mL	1
99	8/27/2009	Chronic	EFF-002	Total Coliform 7-day Median < 23 MPN/100mL	50 MPN/100mL	1
100	8/31/2009	Chronic	EFF-001	Total Suspended Solids Monthly Average < 30 mg/L	30.5 mg/L	1
101	9/2/2009	Chronic	EFF-002	Total Coliform 7-day Median < 23 MPN/100mL	50 MPN/100mL	1
102	9/5/2009	Serious* and Chronic	EFF-001	Total Suspended Solids Weekly Average < 45 mg/L	118 mg/L	1
103	9/5/2009	Chronic	EFF-001	Total Suspended Solids Weekly Average < 751 Lbs/day	755 Lbs/day	1
104	9/9/2009	Chronic	EFF-002	Total Coliform No more than one sample over 240 MPN/100 mL in a 30-day period	2 samples over the limit	1
105	9/9/2009	Chronic	EFF-002	Total Coliform 7-day Median < 23 MPN/100mL	50 MPN/100mL	1
106	9/16/2009	Chronic	EFF-002	Total Coliform No more than one sample over 240 MPN/100 mL in a 30-day period	Sept. 9: 3,000 MPN/100 mL Sept. 16: 280 MPN/100 mL	1
107	9/16/2009	Chronic	EFF-002	Total Coliform 7-day Median < 23 MPN/100mL	50 MPN/100mL	1
108	9/23/2009	Chronic	EFF-002	Total Coliform 7-day Median < 23 MPN/100mL	100 MPN/100mL	1

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No.	Violation Date	Violation Type	Monitoring Location	Parameter Effluent Limit	Analytical Results	MMP
109	9/30/2009	Chronic	EFF-002	Total Coliform No more than one sample over 240 MPN/100 mL in a 30-day period	Sept. 16: 280 MPN/100 mL Sept. 30: 300 MPN/100 mL	1
110	9/30/2009	Chronic	EFF-002	Total Coliform 7-day Median \leq 23 MPN/100mL	100 MPN/100mL	1
111	9/30/2009	Serious* and Chronic	EFF-001	Total Suspended Solids Monthly Average \leq 30 mg/L	48 mg/L	1
112	10/7/2009	Chronic	EFF-002	Total Coliform 7-day Median \leq 23 MPN/100mL	100 MPN/100mL	1
113	10/14/2009	Chronic	EFF-002	Total Coliform 7-day Median \leq 23 MPN/100mL	100 MPN/100mL	1
114	10/21/2009	Chronic	EFF-002	Total Coliform 7-day Median \leq 23 MPN/100mL	100 MPN/100mL	1
115	10/24/2009	Chronic	EFF-001	Total Suspended Solids Weekly Average \leq 45 mg/L	56 mg/L	1
116	10/28/2009	Chronic	EFF-002	Total Coliform 7-day Median \leq 23 MPN/100mL	100 MPN/100mL	1
117	10/31/2009	Chronic	EFF-001	Total Suspended Solids Monthly Average \leq 30 mg/L	37.8 mg/L	1
118	11/4/2009	Chronic	EFF-002	Total Coliform 7-day Median \leq 23 MPN/100mL	42 MPN/100mL	1
119	11/12/2009	Chronic	EFF-002	Total Coliform 7-day Median \leq 23 MPN/100mL	34 MPN/100mL	1
120	11/14/2009	Chronic	EFF-001	Total Suspended Solids Weekly Average \leq 45 mg/L	56 mg/L	1
121	11/21/2009	Serious* and Chronic	EFF-001	Total Suspended Solids Weekly Average \leq 45 mg/L	67 mg/L	1
122	11/25/2009	Chronic	EFF-002	Total Coliform 7-day Median \leq 23 MPN/100mL	26 MPN/100mL	1
123	11/28/2009	Chronic	EFF-001	Total Suspended Solids Weekly Average \leq 45 mg/L	55 mg/L	1
124	11/30/2009	Serious* and Chronic	EFF-001	Total Suspended Solids Monthly Average \leq 30 mg/L	52.3 mg/L	1
125	12/19/2009	Serious* and Chronic	EFF-001	Total Suspended Solids Weekly Average \leq 45 mg/L	64 mg/L	1
126	12/23/2009	Chronic	EFF-002	Total Coliform 7-day Median \leq 23 MPN/100mL	26 MPN/100mL	1
127	12/26/2009	Chronic	EFF-001	Total Suspended Solids Weekly Average \leq 45 mg/L	62 mg/L	1

Attachment A

Susanville Sanitary District Wastewater Treatment Plant

Table of Effluent Limit Violations

No.	Violation Date	Violation Type	Monitoring Location	Parameter Effluent Limit	Analytical Results	MMP
128	12/30/2009	Chronic	EFF-002	Total Coliform No more than one sample over 240 MPN/100 mL in a 30-day period	Dec. 16: 60,000 MPN/100 mL Dec. 30: 6,800 MPN/100 mL	1
129	12/31/2009	Serious* and Chronic	EFF-001	Total Suspended Solids Monthly Average ≤ 30 mg/L	51.6 mg/L	1
130	1/2/2010	Chronic	EFF-001	Total Suspended Solids Weekly Average ≤ 45 mg/L	60 mg/L	1
131	1/7/2010	Chronic	EFF-002	Total Coliform No more than one sample over 240 MPN/100 mL in a 30-day period	Dec. 30: 6,800 MPN/100 mL Jan. 7: 5,400 MPN/100 mL	1
132	1/7/2010	Chronic	EFF-002	Total Coliform 7-day Median < 23 MPN/100mL	60 MPN/100mL	1
133	1/13/2010	Chronic	EFF-002	Total Coliform 7-day Median < 23 MPN/100mL	60 MPN/100mL	1
134	1/20/2010	Chronic	EFF-002	Total Coliform 7-day Median < 23 MPN/100mL	60 MPN/100mL	1
135	1/27/2010	Chronic	EFF-002	Total Coliform 7-day Median < 23 MPN/100mL	200 MPN/100mL	1
136	2/3/2010	Chronic	EFF-002	Total Coliform 7-day Median < 23 MPN/100mL	60 MPN/100mL	1
137	2/10/2010	Chronic	EFF-002	Total Coliform 7-day Median < 23 MPN/100mL	200 MPN/100mL	1
138	2/17/2010	Chronic	EFF-002	Total Coliform 7-day Median < 23 MPN/100mL	44 MPN/100mL	1
139	2/24/2010	Chronic	EFF-002	Total Coliform 7-day Median < 23 MPN/100mL	30 MPN/100mL	1
140	2/27/2010	Chronic	EFF-001	Total Suspended Solids Weekly Average < 45 mg/L	46 mg/L	1
141	3/3/2010	Chronic	EFF-002	Total Coliform 7-day Median < 23 MPN/100mL	28 MPN/100mL	1
142	3/25/2010	Chronic	EFF-001	Total Suspended Solids Weekly Average < 45 mg/L	48.0 mg/L	1
143	3/31/2010	Chronic	EFF-001	Total Suspended Solids Monthly Average < 30 mg/L	39.3 mg/L	1
144	4/15/2010	Chronic	EFF-001	pH Instantaneous Maximum < 8.5	8.7	1
145	5/6/2010	Chronic	EFF-001	Total Suspended Solids Weekly Average < 45 mg/L	50.0 mg/L	1

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No.	Violation Date	Violation Type	Monitoring Location	Parameter Effluent Limit	Analytical Results	MMP
146	5/10/2010	Chronic	EFF-001	pH Instantaneous Maximum ≤ 8.5	8.6	1
147	5/20/2010	Chronic	EFF-001	Total Suspended Solids Weekly Average ≤ 45 mg/L	47.0 mg/L	1
148	5/31/2010	Chronic	EFF-001	Total Suspended Solids Monthly Average ≤ 30 mg/L	38.5 mg/L	1
149	6/30/2010	Chronic	EFF-001	Total Suspended Solids Monthly Average ≤ 30 mg/L	32.3 mg/L	1
150	8/31/2010	Chronic	EFF-001	Total Suspended Solids Monthly Average ≤ 30 mg/L	40.3 mg/L	1
151	8/24/2010	Chronic	EFF-001	Total Coliform 7-day Median ≤ 23 MPN/100mL	30 MPN/100mL	1
152	8/31/2010	Chronic	EFF-001	Total Coliform 7-day Median ≤ 23 MPN/100mL	30 MPN/100mL	1
153	9/7/2010	Chronic	EFF-001	Total Coliform 7-day Median ≤ 23 MPN/100mL	30 MPN/100mL	1
154	9/30/2010	Chronic	EFF-001	Total Suspended Solids Monthly Average ≤ 30 mg/L	31.2 mg/L	1
mg/L = milligrams per liter						
MPN/100 mL = most probable number per 100 milliliters						
First three of four violations occurring in a period of six months						
* - One of the 10 serious violations that are not included in the chronic count.						
Total Violations Subject to MMPs						151