Central Coast Regional Water Quality Control Board

October 5, 2026

Chris Sneddon
Director
County of Santa Barbara Department
of Public Works
123 Anapamu Street
Santa Barbara, CA 93101
Email: csneddo@countyofsb.org

Via Electronic and Certified Mail
7020 1810 0002 0767 8995

Dear Chris Sneddon:

ENFORCEMENT PROGRAM: COUNTY OF SANTA BARBARA TAJIGUAS COMPOST MANAGEMENT UNIT, 14470 CALLE REAL, SANTA BARBARA COUNTY, WDID 3 421224021 – EXPEDITED PAYMENT PROGRAM – CONDITIONAL SETTLEMENT OFFER TO RESOLVE ALLEGED PERMIT VIOLATIONS THROUGH ADMINISTRATIVE CIVIL LIABILITY ORDER R3-2026-0069

The California Regional Water Quality Control Board, Central Coast Region (Central Coast Water Board) is a state regulatory agency with the responsibility for protecting the quality of the waters of the state within its area of jurisdiction. The Central Coast Water Board has authority to require submission of information, direct action, establish regulations, levy penalties, and bring legal action when necessary to protect water quality. The purpose of this letter is to notify the County of Santa Barbara Department of Public Works (Discharger) of alleged violations of Waste Discharge Requirements (WDR) General Order R3-2022-0035, National Pollutant Discharge Elimination System Permit (NPDES) CAG993004, subject to mandatory minimum penalties, and of the opportunity to participate in an expedited settlement process to address $45,000 (Penalty Amount) in liability.

PLEASE NOTE: NO PAYMENT IS YET DUE IN RESPONSE TO THIS LETTER

ALLEGED VIOLATIONS

The Central Coast Water Board's Assistant Executive Officer alleges that from January 6, 2026, to June 24, 2026, the Discharger violated the effluent limitations and/or late reporting requirements identified in the notice of violation (NOV) attached to the enclosed Acceptance of Conditional Settlement Offer and Waiver of Right to Hearing (Acceptance and Waiver); Administrative Civil Liability Order R3-2026-0069 (ACL Order) for discharges to Pila Creek.

STATUTORY LIABILITY

California Water Code sections 13385, subdivisions (h) and (i) and 13385.1, require the assessment of a mandatory minimum penalty of $3,000 for specified serious and non-serious effluent limitation and/or late reporting violations. The enforcement action that the Central Coast Water Board uses to assess such liability is an administrative civil liability complaint, followed by a public hearing on the matter. The Central Coast Water Board is required to, at a minimum, assess the mandatory minimum penalties. Alternatively, the Central Coast Water Board has the option to assess higher discretionary administrative civil liabilities, beginning with the date on which the violations first occurred. Discretionary administrative civil liabilities may be assessed up to $10,000 for each day in which the violation occurs, plus $10 for each gallon discharged but not cleaned up in excess of 1,000 gallons. The Central Coast Water Board also has the option to refer such matters to the Attorney General's Office for prosecution. If referred to the Attorney General's Office for prosecution, the Superior Court may assess up to $25,000 for each day in which the violation occurs, and $25 for each gallon discharged but not cleaned up in excess of 1,000 gallons.

The Central Coast Water Board Executive Officer is being provided a copy of this cover letter without attachments for informational purposes only. If you accept the conditional settlement offer and therefore agree to enter into settlement negotiations with the Assistant Executive Officer and its Prosecution Team, any settlement negotiations would be conducted confidentially in accordance with California Evidence Code sections 1152 and 1154.

CONDITIONAL SETTLEMENT OFFER

To avoid the issuance of an administrative civil liability complaint and promote expedited resolution of the alleged violations, the Central Coast Water Board Assistant Executive Officer offers the Discharger an opportunity to participate in the expedited payment program to settle the matter by completing and returning the enclosed Acceptance and Waiver. Details of the Conditional Settlement Offer are described in this letter and in the Acceptance and Waiver. If the Discharger accepts this offer, the Central Coast Water Board Assistant Executive Officer will forego issuance of an administrative civil liability complaint, will not refer the violations to the Attorney General's Office, will not charge incurred staff costs, and will not seek discretionary administrative civil liabilities for the alleged violations identified in the NOV.

DISCHARGER'S OPTIONS FOR RESPONSE TO CONDITIONAL SETTLEMENT OFFER

The Discharger's options for responding to the Conditional Settlement Offer are the following:

1. **Accept the Conditional Settlement Offer**: If the Discharger accepts the Conditional Settlement Offer, the Discharger must complete and return the enclosed Acceptance and Waiver **no later than November 4, 2026**. The Acceptance and Waiver document provides more details regarding the conditions of the settlement and payment option(s) for the Penalty Amount. *Note: No*

payment is due at the time the Discharger returns the signed Acceptance and Waiver to the Central Coast Water Board.

2. **Contest Alleged Violations**: If the Discharger chooses to contest any of the violations alleged in the NOV attached to the Acceptance and Waiver, the Discharger must identify each violation and the basis for its challenge (e.g., factual error, affirmative defense) **on or before November 4, 2026**. Central Coast Water Board staff will evaluate the contested violations and take one of the following actions:

    a. If Central Coast Water Board staff determine the alleged violations are not supported, it will expunge or exempt those violations, take no further action against the Discharger for those violations, and notify the Discharger in writing of that determination. For any remaining violations, the Discharger will be given 30 days from the date of receipt of Central Coast Water Board staff's determination to either accept the Conditional Settlement Offer by completing and returning the Acceptance and Waiver to the Central Coast Water Board, or to reject the Conditional Settlement Offer; or

    b. If Central Coast Water Board staff determine the alleged violations are valid, staff will notify the Discharger of that determination. The Discharger will be given 30 days from the date of receipt of Central Coast Water Board staff's determination to either accept the Conditional Settlement Offer by completing and returning the Acceptance and Waiver to the Central Coast Water Board, or to reject the Conditional Settlement Offer.

3. **Reject the Conditional Settlement Offer**: If the Discharger does not respond **by November 4, 2026**, or rejects the Conditional Settlement Offer, the Central Coast Water Board Assistant Executive Officer may issue an administrative civil liability complaint for any unresolved alleged violations. In an administrative civil liability complaint, the liability amount sought and/or imposed may exceed the liability amount in the Conditional Settlement Offer.

CONTACT PERSONS

Should the Discharger have any questions about the NOV, the Conditional Settlement Offer, Acceptance and Waiver, the ACL Order, or expedited payment program process, please contact Kelsey DeLong at kelsey.delong@waterboards.ca.gov or (805) 594-6182, or Todd Stanley at todd.stanley@waterboards.ca.gov or (805) 542-4769.

Sincerely,

Original signed by Angela Schroeter
dated October 5, 2026

Angela V. Schroeter
Assistant Executive Officer

Enclosure: Acceptance of Conditional Settlement Offer and Waiver of Right to Hearing; Administrative Civil Liability Order R3-2026-0069

cc via email:

Central Coast Water Board:
Angela Schroeter, angela.schroeter@waterboards.ca.gov
Kelsey DeLong, kelsey.delong@waterboards.ca.gov
Tamara Anderson, tamara.anderson@waterboards.ca.gov
Arwen Wyatt-Mair, arwen.wyatt-mair@waterboards.ca.gov
Mark Lemus, mark.lemus@waterboards.ca.gov
Todd Stanley, todd.stanley@waterboards.ca.gov

File Location: R:\RB3\Enforcement\EPLs\2026-0069 Tajiguas CMU\Tajiguas MMP EPL 26-0069_Offer.docx

ECM Primary Indexing # CW-874811

ACCEPTANCE OF CONDITIONAL SETTLEMENT OFFER AND WAIVER OF RIGHT TO HEARING;

ADMINISTRATIVE CIVIL LIABILITY ORDER R3-2026-0069

County of Santa Barbara Department of Public Works (Discharger)
Tajiguas Compost Management Facility
14470 Calle Real, Goleta, CA
Santa Barbara County
Waste Discharge Requirements General Order R3-2022-0035
National Pollutant Discharge Elimination System (NPDES) Permit CAG993004
WDID: 3 421224021

By signing below and returning this Acceptance of Conditional Settlement Offer and Waiver of Right to Hearing (Acceptance and Waiver) to the California Regional Water Quality Control Board, Central Coast Region (Central Coast Water Board), the Discharger hereby accepts the Conditional Settlement Offer from the Assistant Executive Officer to participate in the expedited payment program to settle the alleged violations and waives the right to a hearing before the Central Coast Water Board to dispute the alleged violations. The alleged violations are identified in the attached notice of violation (NOV).

The Discharger agrees that the NOV shall serve as a complaint pursuant to Division 7, Chapter 5, Article 2.5 of the California Water Code and that no separate complaint is required for the Central Coast Water Board to assert jurisdiction over the alleged violations. The Discharger agrees to pay the mandatory minimum penalties (Penalty Amount) authorized by California Water Code sections 13385 and 13385.1, as specified in the NOV, which shall be deemed payment in full of any civil liability pursuant to Water Code sections 13385 and 13385.1 that otherwise might be assessed for the violations described in the NOV. The Discharger understands that by signing this Acceptance and Waiver, the Discharger waives its right to contest the allegations in the NOV and the amount of administrative civil liability for such violations.

The Discharger understands that this Acceptance and Waiver does not address or resolve liability for any violation that is not specifically identified in the NOV.

The Discharger understands that federal regulations set forth in title 40, Code of Federal Regulations, section 123.27(d)(2)(iii) require the Central Coast Water Board to publish notice of and provide at least 30 days for public comment on any proposed resolution of an enforcement action addressing NPDES permit violations. Accordingly, Central Coast Water Board staff will publish this Acceptance and Waiver for public comment.

If no public comments or new material facts are received within the public comment period that cause the Central Coast Water Board Assistant Executive Officer to reconsider the proposed Conditional Settlement Offer, the Executive Officer, through its delegated authority by the Central Coast Water Board, will consider execution of the Acceptance and Waiver as the executed Administrative Civil Liability Order R3-2026-0069 (ACL Order) that resolves the alleged violations identified in the NOV.

If significant public comments are received in opposition to the Acceptance and Waiver and/or new material facts become available that are relevant to the Acceptance and Waiver, the Central Coast Water Board Assistant Executive Officer may withdraw the Conditional Settlement Offer. In that circumstance, the Central Coast Water Board Assistant Executive Officer may issue a revised Conditional Settlement Offer or may issue an administrative civil liability complaint and the matter would be set for a hearing before the Central Coast Water Board. For such a civil liability hearing, the Discharger understands that this Acceptance and Waiver executed by the Discharger will not be used as evidence against the Discharger.

Penalty Amount: $45,000

The Discharger must fill in the blank boxes in Table 1 below to indicate how the Discharger will direct its payment of the Penalty Amount. Payment is not due until after Central Coast Water Board staff completes the public comment period and the Executive Officer issues the ACL Order as described herein.

The Discharger's payment options are shown below.

1. Payment Option 1 – Direct the entire Penalty Amount as Supplemental Environmental Project (SEP) funds towards the Bay Foundation of Morro Bay's (Bay Foundation) Central Coast Drinking Water Well Testing Program (Drinking Water Well Testing Program). See the *Bay Foundation's Drinking Water Well Testing Program – Use of Supplemental Environmental Project Funds summary document*[1] for more details about the program.

2. Payment Option 2 – Direct a portion of the Penalty Amount as SEP funds towards the Drinking Water Well Testing Program, and direct the remaining portion of the Penalty Amount to the State Water Pollution Cleanup and Abatement Account.[2] If the Discharger elects to allocate only a portion of the Penalty Amount towards the Drinking Water Well Testing Program, then the Discharger must pay the remaining Penalty Amount to the State Water Pollution Cleanup and Abatement Account.

3. Payment Option 3 – Reject the option to direct any of the Penalty Amount towards the Drinking Water Well Testing Program and instead pay the entire Penalty Amount to the State Water Pollution Cleanup and Abatement Account.

[1] Bay Foundation's Drinking Water Well Testing Program – Use of Supplemental Environmental Project Funds summary document:
https://www.waterboards.ca.gov/centralcoast/water_issues/programs/enforcement/docs/2024/summary-drinking-water-well-testing-sep.pdf
[2] Cleanup and Abatement Account:
https://www.waterboards.ca.gov/water_issues/programs/grants_loans/cleanup_and_abatement.html

For Payment Option 1 or 2, the Discharger will not have any additional obligations related to the Drinking Water Well Testing Program upon proof of payment to the Bay Foundation. Electing to pay all or a portion of the Penalty Amount to the Drinking Water Well Testing Program will not change the total Penalty Amount that must be paid to resolve the mandatory minimum penalties for the alleged violations.

Table 1: Penalty Amount Payment Option Selection

(***Please note that no payments are due at the time the Discharger returns this signed Acceptance and Waiver form to the Central Coast Water Board.***)

Payment Options	Mark "X" Below to Select One Payment Option	Enter SEP and CAA Portions of Penalty Amount ($) if Payment Option 2 Selected
Payment Option 1: Direct entire Penalty Amount as SEP funds to the Central Coast Drinking Water Well Testing Program		No entry required in this box. Entire Penalty Amount will be directed as SEP funds to the Central Coast Drinking Water Well Testing Program.
Payment Option 2: Direct portion of Penalty Amount as SEP funds to the Central Coast Drinking Water Well Testing Program, and the remaining portion to the State Water Pollution Cleanup and Abatement Account (CAA)	***If "X" marked in this box, then enter portion amounts in box to the right.***	Portion of Penalty Amount to direct as SEP funds to the Central Coast Drinking Water Well Testing Program: $_____ Portion of Penalty Amount to direct to the CAA: $_____ ***Sum of amounts entered in this box must equal the Penalty Amount.***
Payment Option 3: Direct entire Penalty Amount to the State Water Pollution Cleanup and Abatement Account (CAA)		No entry required in this box. Entire Penalty Amount will be directed to the CAA.

Upon signature by the Discharger, the Discharger must return this Acceptance and Waiver in pdf format via email or mail to:

Kelsey DeLong
Enforcement Coordinator

Email: kelsey.delong@waterboards.ca.gov
Central Coast Water Board
895 Aerovista Place, Suite 101
San Luis Obispo, CA 93401

The Discharger understands that no payments are due at the time it returns the signed Acceptance and Waiver form to the Central Coast Water Board. After the required public comment period and execution of the Acceptance and Waiver as the executed ACL Order by the Executive Officer, the Central Coast Water Board will transmit the executed ACL Order to the Discharger. The transmittal letter will include payment due dates and payment instructions based on the payment options selected in the Acceptance and Waiver. The full payment of the Penalty Amount shall be due within 30 calendar days of the executed ACL Order. Furthermore, the Discharger understands that full payment within 30 calendar days of the executed ACL Order is a material condition of this Acceptance and Waiver. Failure to pay the Penalty Amount within the required time period may subject the Discharger to further liability.

IT IS SO STIPULATED.
I hereby affirm that I am duly authorized to act on behalf of and to bind the Discharger in the making and giving of this Acceptance and Waiver.

By:_____ _____
(Signed Name) (Date)

_____
(Printed or Typed Name)

_____
(Email)

_____
(Title)

IT IS HEREBY ORDERED pursuant to Water Code section 13323 and Government Code section 11415.60 on behalf of the California Regional Water Quality Control Board, Central Coast Region that ACL Order R3-2026-0069 is hereby adopted.

By:_____
Ryan E. Lodge
Executive Officer
Central Coast Water Board

Attachment: Notice of Violation

File Location: R:\RB3\Enforcement\EPLs\2026-0069 Tajiguas CMU\Tajiguas MMP EPL 26-0069_Waiver.docx

ECM Primary Indexing # CW-874811

Exhibit A – Notice of Violation
County of Santa Barbara Department of Public Works Tajiguas Compost Management Unit
Mandatory Minimum Penalty Violations Requiring Enforcement
Alleged Violation Dates: January 6, 2026 – June 24, 2026

The enforcement staff of the California Regional Water Quality Control Board, Central Coast Region (Central Coast Water Board) reviewed information submitted by this facility to determine whether the discharger is subject to mandatory minimum penalties (MMPs) pursuant to subdivisions (h) and (i) of California Water Code section 13385 and section 13385.1. The following table or tables list this facility's alleged violations of Waste Discharge Requirements General Order R3-2022-0035, National Pollutant Discharge Elimination System Permit CAG993004 from January 6, 2026, to June 24, 2026, for which the Central Coast Water Board has not yet assessed MMPs. The Central Coast Water Board reserves the right to pursue additional violations that occurred in or around that period that may be subject to MMPs and that were not included in this document due to reasons such as, but not limited to, new information, ongoing investigation, discharger reporting errors, or circumstances beyond our control. Final calculation of MMP amounts and definitions of some of the terms used in this document are listed below the table.

For additional information about the alleged violations listed in the table, please refer to the State Water Resources Control Board CIWQS Public Reports webpage[1] and select the "Mandatory Minimum Penalty (MMP) Report" link located under the "Violations Reports" category. Once in the Mandatory Minimum Penalty Reports search page, select Region 3 along with the beginning and ending dates shown in this exhibit, select Run Report, and then select your facility to access the list of violations. Expand the "Effluent MMP Violations" and/or "Late Report MMP Violations" sections of that page by selecting the "+" icon to the left of the section titles. To view details of a violation, select the "Violation ID" number. For chronic (non-serious) effluent violations, select the "Chronic" link in the "MMP Type" column of the "Effluent Limit Violations" section to see a list of the three or more violations preceding each chronic violation within 180 days and thus qualifying the chronic violation as an MMP.

[1] CIWQS Public Reports: http://www.waterboards.ca.gov/water_issues/programs/ciwqs/publicreports.shtml

EPL R3-2026-0069 – Exhibit A
ACL Order R3-2026-0069
County of Santa Barbara Department of Public Works
Tajiguas Compost Management Unit

Effluent MMP Violations Table

#	Violation Number	Violation Date	Pollutant	Pollutant Type	Limit Period	Limit	Result	Units	% Over Limit	S or C for Serious or Chronic (Non-Serious) Violation	Date 180 Days Prior	Number of Violations within 180 days	Mandatory Minimum Penalty
1	1154902	1/6/26	Cyanide, Total	Group 2	Daily Maximum	5.2	34	ug/L	554	S	N/A	N/A	$ 3,000
2	1154888	1/6/26	Lead, Total	Group 2	Daily Maximum	2.5	47	ug/L	1,780	S	N/A	N/A	$ 3,000
3	1154901	1/6/26	Copper, Total	Group 2	Daily Maximum	9	161	ug/L	1,689	S	N/A	N/A	$ 3,000
4	1154892	1/6/26	Zinc, Total	Group 2	Daily Maximum	100	354	ug/L	254	S	N/A	N/A	$ 3,000
5	1154889	1/6/26	Mercury, Total	Group 2	Daily Maximum	0.012	0.4	ug/L	3,233	S	N/A	N/A	$ 3,000
6	1154891	1/6/26	Nickel, Total	Group 2	Daily Maximum	52	73	ug/L	40	S	N/A	N/A	$ 3,000
7	1154899	1/6/26	Arsenic, Total	Group 2	Daily Maximum	10	14	ug/L	40	S	N/A	N/A	$ 3,000
8	1154890	1/6/26	Phenol, Single Compound	Group 2	Daily Maximum	1	230	ug/L	22,900	S	N/A	N/A	$ 3,000

#	Violation Number	Violation Date	Pollutant	Pollutant Type	Limit Period	Limit	Result	Units	% Over Limit	S or C for Serious or Chronic (Non-Serious) Violation	Date 180 Days Prior	Number of Violations within 180 days	Mandatory Minimum Penalty
9	1154896	1/28/26	Copper, Total	Group 2	Daily Maximum	9	15	ug/L	64	S	N/A	N/A	$ 3,000
10	1154894	1/28/26	Lead, Total	Group 2	Daily Maximum	2.5	3	ug/L	20	S	N/A	N/A	$ 3,000
11	1154895	1/28/26	Mercury, Total	Group 2	Daily Maximum	0.012	0.019	ug/L	58	S	N/A	N/A	$ 3,000
12	1154898	2/25/26	Lead, Total	Group 2	Daily Maximum	2.5	2.9	ug/L	16	C	8/29/25	13	$ 3,000
13	1154893	2/25/26	Copper, Total	Group 2	Daily Maximum	9	13	ug/L	44	S	N/A	N/A	$ 3,000
14	1154897	2/25/26	Mercury, Total	Group 2	Daily Maximum	0.012	0.049	ug/L	308	S	N/A	N/A	$ 3,000
15	1159222	6/24/26	Copper, Total	Group 2	Daily Maximum	9	11	ug/L	22	S	N/A	N/A	$ 3,000

Total Penalty for Effluent Violations: $45,000

Calculation of Total Mandatory Minimum Penalty Amount for Effluent and Late Reporting Violations:
(14 Serious Violations + 1 Non-Serious Violation) × $3,000 = $45,000

For Group 2 pollutants, a violation is serious when the limit is exceeded by 20% or more, and non-serious when the limit is exceeded by less than 20%. “Non-serious” is also referred to as “chronic” in CIWQS, indicating violations are occurring too frequently.

Each serious violation is subject to a mandatory minimum penalty of $3,000.

A non-serious (also known as chronic) violation is subject to a mandatory minimum penalty of $3,000 when it is preceded by three chronic or serious violations (or more) in a 180-day period representing six consecutive months (e.g., period commencing on the date of the violation being evaluated and ending 180 days before that date). The three most recent preceding chronic or serious violations within the 180-day period that are counted first toward qualifying a chronic violation for a mandatory minimum penalty are not penalized within that specific determination.

For example, if a violation named V4 is preceded by three violations V1, V2, and V3 within a 180-day period, V4 is determined to be subject to a mandatory minimum penalty of $3,000. Within that specific determination for violation V4, V1 through V3 are counted but not penalized. However, each violation is subject to its own specific determination. So, V1, V2, and V3 are each subject to their own evaluation based on their specific occurrence dates and applicable 180-day periods and may warrant or have warranted in a previous enforcement action their own penalty as a chronic or serious violation.

Accordingly, all violations indicating “C” for “Chronic” in the above table also show four or more violations within 180 days because each of the chronic violations is preceded by three (or more) violations in that period. Please see the instructions on the first page of this exhibit if you would like to view in CIWQS all of the preceding violations applicable to the above chronic violations.

Term	Definition
Units	ug/L = micrograms per liter
N/A	Not Applicable

Term	Definition
CIWQS	California Integrated Water Quality System database used by the Water Boards to manage violation and enforcement activities, as well as other data types relevant to water quality protection.
Violation Number	Identification number assigned to a violation in CIWQS.
Violation Date	Date that a violation occurred, with the exception that for some violation types, such as a monthly average, the last day of the reporting period is used. If the occurrence date is unknown, the date used is the day the violation was first discovered by staff, the Discharger, or a third party.
Pollutant Types: Group 2	Group of pollutants defined in the State Water Resources Control Board Water Quality Enforcement Policy. Also referred to as Category 2 or CAT2.

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