

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
CENTRAL VALLEY REGION**

In the Matter of:

**City of Colusa
City of Colusa Wastewater Treatment Plant
Colusa County**

ORDER R5-2023-0510

**SETTLEMENT AGREEMENT AND
STIPULATION FOR ENTRY OF
ADMINISTRATIVE CIVIL LIABILITY
ORDER**

I. Introduction

1. This Settlement Agreement and Stipulation for Entry of Administrative Civil Liability Order (Stipulated Order or Order) is entered into by and between the Assistant Executive Officer of the California Regional Water Quality Control Board, Central Valley Region (Central Valley Water Board), on behalf of the Central Valley Water Board Prosecution Team (Prosecution Team), and the City of Colusa (Discharger) (collectively known as the Parties) and is presented to the Central Valley Water Board, or its delegee, for adoption as an order by settlement, pursuant to California Water Code section 13323 and Government Code section 11415.60.

II. Recitals

2. The Discharger owns and operates the City of Colusa Wastewater Treatment Plant (Facility) a wastewater collection, treatment, and disposal system, which provides sewerage service to the City of Colusa. Treated municipal wastewater is discharged to an unnamed tributary of Powell Slough, a water of the United States and tributary to the Colusa Basin Drain within the Sacramento River Watershed.
3. In order to regulate discharges from the Facility, on 18 August 2016, the Central Valley Water Board adopted Waste Discharge Requirements (WDRs) Order R5-2016-0062 (NPDES CA0078999), which was amended to R5-2016-0062-01 by order R5-2018-0018 on 6 April 2018, and to R5-2016-0062-02 by order R5-2020-0006 on 20 February 2020. On 21 April 2022, The Central Valley Water Board adopted WDRs Order R5-2022-0020 (NPDES CA0078999), which became effective on 1 June 2022.
4. WDRs Order R5-2016-0062-02, IV.A.1.d., requires that total coliform organisms in effluent shall not exceed:
 - a. 2.2 most probable number (MPN) per 100 mL, as a 7-day median;
 - b. 23 MPN/100 mL, more than once in any 30-day period; and
 - c. 240 MPN/100 mL, at any time.
5. WDRs Order R5-2022-0020, IV.A.1.e., requires that total coliform organisms in effluent shall not exceed:
 - a. 2.2 most probable number (MPN) per 100 mL, as a 7-day median;

Stipulated Administrative Civil Liability Order R5-2023-0510
City of Colusa

- b. 23 MPN/100 mL, more than once in any 30-day period; and
 - c. 240 MPN/100 mL, at any time.
6. This Stipulated Order addresses violations that occurred between 1 March 2022 and 31 December 2022. On 24 April 2023, Central Valley Water Board staff issued the Discharger a Notice of Violation and Record of Violations (ROV) for effluent limitation violations relating to total coliform exceedances occurring between 1 March 2022 and 31 December 2022. The Discharger responded on 8 May 2023 and agreed with the violations detailed in the ROV. These violations are subject to penalties as described below.
7. This Order addresses an administrative civil liability (ACL) for effluent limitation violations that occurred between 1 March 2022 and 31 December 2022. These violations are specifically identified in Attachment A, Record of Violations, to this Order as subject to mandatory minimum penalties (MMPs). Attachment A to this Order is attached hereto and incorporated herein by this reference.
8. Water Code section 13385, subdivisions (h) and (i) require assessment of mandatory minimum penalties (MMPs) and state, in part, the following:

Water Code section 13385, subdivision (h)(1) states:

Notwithstanding any other provision of this division, and except as provided in subdivisions (j), (k), and (l), a mandatory minimum penalty of three thousand dollars (\$3,000) shall be assessed for each serious violation.

Water Code section 13385, subdivision (h)(2) states:

For the purposes of this section, a “serious violation” means any waste discharge that violates the effluent limitations contained in the applicable waste discharge requirements for a Group II pollutant, as specified in Appendix A to Section 123.45 of Title 40 of the Code of Federal Regulations, by 20 percent or more or for a Group I pollutant, as specified in Appendix A to Section 123.45 of Title 40 of the Code of Federal Regulations, by 40 percent or more.

Water Code section 13385, subdivision (i)(1) states, in part:

Notwithstanding any other provision of this division, and except as provided in subdivisions (j), (k), and (l), a mandatory minimum penalty of three thousand dollars (\$3,000) shall be assessed for each violation whenever the person does any of the following four or more times in any period of six consecutive months, except that the requirement to assess the mandatory minimum penalty shall not be applicable to the first three violations:

- A) Violates a waste discharge requirement effluent limitation.
- B) Fails to file a report pursuant to Section 13260.
- C) Files an incomplete report pursuant to Section 13260.

- 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.
9. According to the Discharger's self-monitoring reports, the Discharger committed fourteen (14) non-serious violations of the above effluent limitations contained in WDRs Order R5-2016-0062-02 and WDRs Order R5-2023-0510, as shown in Attachment A. All fourteen (14) non-serious violations are subject to MMPs under Water Code section 13385, subdivision (i)(1) because these violations were preceded by three or more effluent limit violations within a 180-day period.
10. The total MMP assessed for the alleged effluent violations is **forty-two thousand dollars (\$42,000)**.
11. Water Code section 13385, subdivision (k) states:
- (1) In lieu of assessing all or a portion of the mandatory minimum penalties pursuant to Water Code section 13385 subdivisions (h) and (i) against a publicly owned treatment works serving a small community, the state board or the regional board may elect to require the publicly owned treatment works to spend an equivalent amount towards the completion of a compliance project proposed by the publicly owned treatment works, if the state board or the regional board finds all of the following:
 - A) The compliance project is designed to correct the violations within five years.
 - B) The compliance project is in accordance with the enforcement policy of the state board, excluding any provision in the policy that is inconsistent with this section.
 - C) The publicly owned treatment works has prepared a financing plan to complete the compliance project.
 - (2) For the purposes of this subdivision, "a publicly owned treatment works serving a small community" means a publicly owned treatment works serving a population of 20,000 persons or fewer or a rural county, with a financial hardship as determined by the state board after considering such factors as the median income of the residents, rate of unemployment, or low population density in the service area of the publicly owned treatment works.
12. Under the State Water Resources Control Board's (State Water Board) Water Quality Enforcement Policy (Enforcement Policy), a publicly owned treatment work (POTW) serving a small community is a POTW serving a community that has a financial hardship and has a population of 10,000 or fewer people or lies completely within one or more rural counties.

13. Adoption of the Enforcement Policy preceded an amendment to Water Code section 13385, subdivision (k)(2), which was amended to raise the population threshold to 20,000 or fewer people.
14. Under the Enforcement Policy, “financial hardship” means that the community served by the POTW meets one of the following criteria:
 - a. Median household income for the community is less than 80 percent of the California median household income;
 - b. The community has an unemployment rate of 10 percent or greater; or
 - c. Twenty percent of the population is below the poverty level.
15. The Central Valley Water Board finds the Discharger is eligible for a compliance project because the Facility is a publicly owned treatment works serving a small community with a financial hardship. The Facility is located in Colusa County, which is a qualified rural county based on the 2013 United States Department of Agriculture Rural-Urban Continuum Codes for California, and serves a population of 6,359 with a median household income (MHI) of \$55,465, which is 65.9% of the statewide MHI, according to the 2021 American Community Survey 5-Year Estimate.
16. On 6 April 2021, the Central Valley Water Board issued Administrative Civil Liability Order (ACLO) R5-2021-0500 assessing a \$69,000 MMP to the Discharger for effluent violations occurring between 1 January 2020 and 30 November 2020. Under ACLO R5-2021-0500, the Discharger was able to apply the entire penalty amount toward a compliance project designed to improve effluent water quality by reducing total coliform. The Discharger submitted documentation showing that it spent \$102,135, which exceeded the \$69,000 penalty by \$33,135, to replace the butterfly valve controlling flow through the ultraviolet (UV) disinfection channels, enclose the UV treatment building, and add a 5-micron filter set.
17. On 28 September 2022, the Central Valley Water Board issued Administrative Civil Liability Order (ACLO) R5-2022-0505 assessing a \$132,000 MMP to the Discharger for effluent violations occurring between 1 December 2020 and 28 February 2022. Under ACLO R5-2022-0505, the Discharger was able to apply \$33,134 toward the compliance project described in ACLO R5-2021-0500, and the remaining amount of \$98,865 toward a compliance project designed to improve effluent water quality by reducing total coliform. The Discharger submitted documentation showing that it spent \$134,000—which exceeded the remaining \$98,865 penalty by \$35,135—to install a stainless-steel liner in the ultraviolet disinfection channels and upgrade the tertiary filter controls.
18. This Order allows \$35,135 of the current MMP to be applied toward the compliance project described in ACLO R5-2022-0505. Applying a portion of the MMP to that compliance project is consistent with the Enforcement Policy because the violations in this Order occurred prior to the completion of the project on 31 May 2023.

19. The Discharger agrees to make full payment of the remaining \$6,865 MMP no later than thirty (30) calendar days after the effective date of this Order. In accordance with California Water Code section 13385(n)(1) and California Water Code section 13385.1(c)(1), funds collected for violations of effluent limitations and reporting requirements pursuant to section 13385 and 13385.1 shall be deposited in the State Water Pollution Cleanup and Abatement Account. Accordingly, the \$6,865 liability shall be paid by cashiers or certified check made out to the "State Water Pollution Cleanup and Abatement Account." Failure to pay the full penalty within the required time period may subject the Discharger to further liability.
20. The Parties have engaged in confidential settlement negotiations and agree to settle the matter without administrative or civil litigation by presenting this Stipulated Order to the Central Valley Water Board, or its delegee, for adoption as an order by settlement, pursuant to Water Code section 13323 and Government Code section 11415.60. To resolve the violations by consent and without further administrative proceedings, the Parties have agreed to the terms herein.
21. The Central Valley Water Board Prosecution Team believes that the resolution of the alleged violations is fair and reasonable and fulfills its enforcement objectives, that no further action is warranted concerning the violations alleged herein and that this Stipulated Order is in the best interest of the public.

III. Stipulations

The Parties stipulate to the following:

22. **Jurisdiction:** The Parties agree that the Central Valley Water Board has subject matter jurisdiction over the matters alleged in this action and personal jurisdiction of the Parties.
23. **Administrative Civil Liability (ACL):**
 - a. The Discharger hereby agrees to the imposition of an ACL in the amount of **forty-two thousand dollars (\$42,000)** to the Central Valley Water Board to resolve the violations specifically alleged in Attachment A to this Order.
 - b. A portion of the penalty in the amount of **\$35,135** has been satisfied through the completion of the compliance project described in ACLO R5-2022-0505 and summarized in Paragraph 17 above. The project was completed on 31 May 2023.
 - c. The Parties agree the Discharger shall deposit the remaining penalty amount of **six thousand eight hundred sixty-five dollars (\$6,865)** in the State Water Pollution Cleanup and Abatement Account. Payment shall be made no later than thirty (30) days after adoption of an order approving this Stipulated Order by the Central Valley Water Board, or its delegee, by check payable to the State Water Pollution Cleanup and Abatement Account. The Discharger shall indicate on the

check the number of this Stipulated Order (R5-2023-0510). The Discharger shall send the original signed check to the Accounting Office, Attn: ACL Payment, P.O. Box 1888, Sacramento, California 95812-1888. A copy of the check shall be emailed to the Central Valley Water Board (Xuan.Luo@waterboards.ca.gov).

24. **Publicity:** Whenever the Discharger or its agents or subcontractors publicizes one or more elements of the Compliance Project, it shall state in a prominent manner that the Compliance Project is being undertaken as part of the settlement of an enforcement action by the Central Valley Water Board against the Discharger.
25. **Compliance with Applicable Laws and Regulatory Changes:** The Discharger understands that payment of an ACL in accordance with the terms of this Stipulated Order and/or compliance with the terms of this Stipulated Order is not a substitute for compliance with applicable laws, and that additional violations of the type alleged may subject it to further enforcement, including additional ACLs. Nothing in this Stipulated Order shall excuse the Discharger from meeting any more stringent requirements which may be imposed hereafter by changes in applicable and legally binding legislation or regulations.

26. Party Contacts for Communications Related to Stipulated Order:

For the Central Valley Water Board:
Xuan Luo, Ph.D., P.E.
Senior Water Resources Control Engineer
NPDES/Forest Activities Compliance and Enforcement
11020 Sun Center Drive, Suite 200
Rancho Cordova, CA 95670
(916) 464-4606
Xuan.Luo@waterboards.ca.gov

For the Discharger:
Jesse Cain, City Manager
City of Colusa
425 Webster Street
Colusa, CA 95932
(530) 458-4740 x105
citymanager@cityofcolusa.com

27. **Attorney's Fees and Costs:** Except as otherwise provided herein, each Party shall bear all attorneys' fees and costs arising from the Party's own counsel in connection with the matters set forth herein.
28. **Public Notice:** The Discharger understands that this Stipulated Order will be noticed for a 30-day public review and comment period prior to consideration by the Central Valley Water Board, or its delegee. If significant new information is received that reasonably affects the propriety of presenting this Stipulated Order to the Central Valley Water Board, or its delegee, for adoption, the Assistant Executive Officer may

unilaterally declare this Stipulated Order void and decide not to present it to the Central Valley Water Board, or its delegee. The Discharger agrees that it may not rescind or otherwise withdraw its approval of this proposed Stipulated Order.

29. **Procedure:** The Parties agree that the procedure that has been adopted for the approval of the settlement by the Parties and review by the public, as reflected in this Stipulated Order, will be adequate. In the event procedural objections are raised prior to this Stipulated Order becoming effective, the Parties agree to meet and confer concerning any such objections and may agree to revise or adjust the procedure as necessary or advisable under the circumstances.
30. **No Waiver of Right to Enforce:** The failure of the Prosecution Team or Central Valley Water Board to enforce any provision of this Stipulated Order shall in no way be deemed a waiver of such provision, or in any way affect the validity of this Stipulated Order. The failure of the Prosecution Team or Central Valley Water Board to enforce any such provision shall not preclude it from later enforcing the same or any other provision of this Stipulated Order. No oral advice, guidance, suggestions, or comments by employees or officials of any Party regarding matters covered under this Stipulated Order shall be construed to relieve any Party regarding matters covered in this Stipulated Order. The Central Valley Water Board reserves all rights to take additional enforcement actions, including without limitation the issuance of ACL complaints or orders for violations other than those addressed by this Order.
31. **Effect of Stipulated Order:** Except as expressly provided in this Stipulated Order, nothing in this Stipulated Order is intended nor shall it be construed to preclude the Central Valley Water Board or any state agency, department, board or entity or any local agency from exercising its authority under any law, statute, or regulation.
32. **Interpretation:** This Stipulated Order shall not be construed against the party preparing it but shall be construed as if the Parties jointly prepared it and any uncertainty and ambiguity shall not be interpreted against any one party.
33. **Modification:** This Stipulated Order shall not be modified by any of the Parties by oral representation whether made before or after the execution of this Order. All modifications must be made in writing and approved by the Central Valley Water Board or its delegee.
34. **Integration:** This Stipulated Order constitutes the entire agreement between the Parties and may not be amended or supplemented except as provided for in this Stipulated Order.
35. **If Order Does Not Take Effect:** In the event that this Stipulated Order does not take effect because it is not approved by the Central Valley Water Board, or its delegee, or is vacated in whole or in part by the State Water Board or a court, the Parties acknowledge that the Prosecution Team may proceed to a contested evidentiary hearing before the Central Valley Water Board to determine whether to assess an ACL for the underlying alleged violations, or may continue to pursue settlement. The

Parties agree that all oral and written statements and agreements made during the course of settlement discussions will not be admissible as evidence in any subsequent administrative or judicial proceeding or hearing and will be fully protected by California Evidence Code sections 1152 and 1154; California Government Code section 11415.60; Rule 408, Federal Rules of Evidence; and any other applicable privilege under federal and/or state law. The Parties also agree to waive any and all objections related to their efforts to settle this matter, including, but not limited to:

- a. Objections related to prejudice or bias of any of the Central Valley Water Board members or their advisors and any other objections to the extent that they are premised in whole or in part on the fact that the Central Valley Water Board members or their advisors were exposed to some of the material facts and the Parties settlement positions, and therefore may have formed impressions or conclusions, prior to conducting any contested evidentiary hearing in this matter; or
- b. Laches or delay or other equitable defenses based on the time period that the Order or decision by settlement may be subject to administrative or judicial review.

36. **Waiver of Hearing:** The Discharger has been informed of the rights provided by Water Code section 13323, subdivision (b), and hereby waives its right to a hearing before the Central Valley Water Board.

37. **Waiver of Right to Petition:** The Discharger hereby waives the right to petition the Central Valley Water Board's adoption of the Stipulated Order as written for review by the State Water Board, and further waives the rights, if any, to appeal the same to a California Superior Court and/or any California appellate level court.

38. **Covenant Not to Sue:** Upon the effective date of this Stipulated Order, Discharger shall and does release, discharge, and covenant not to sue or pursue any civil or administrative claims against any State Agency or the State of California, its officers, agents, directors, employees, attorneys, representatives, for any and all claims or cause of action, which arise out of or are related to this action.

39. **Water Boards Not Liable:** Neither the Central Valley Water Board members, nor the Central Valley Water Board staff, attorneys, or representatives shall be liable for any injury or damage to persons or property resulting from the negligent or intentional acts or omissions by the Discharger or its respective directors, officers, employees, agents, representatives, or contractors in carrying out activities pursuant to this Order, nor shall the Central Valley Water Board, its members, staff, attorneys, or representatives be held as parties to or guarantors of any contract entered into by the Discharger, or its directors, officers, employees, agents, representatives, or contractors in carrying out activities pursuant to this Stipulated Order.

40. **Authority to Bind:** Each person executing this Stipulated Order in a representative capacity represents and warrants that he or she is authorized to execute this Order on behalf of and to bind the entity on whose behalf he or she executes the Order.

41. **Necessity for Written Approvals:** All approvals and decisions of the Central Valley Water Board under the terms of this Stipulated Order shall be communicated to the Discharger in writing. No oral advice, guidance, suggestions, or comments by employees or officials of the Central Valley Water Board regarding submissions or notices shall be construed to relieve the Discharger of its obligation to obtain any final written approval required by this Stipulated Order.
42. **No Third-Party Beneficiaries:** This Stipulated Order is not intended to confer any rights or obligation on any third party or parties, and no third party or parties shall have any right of action under this Stipulated Order for any cause whatsoever.
43. **Severability:** This Stipulated Order is severable; should any provision be found invalid the remainder shall remain in full force and effect.
44. **Effective Date:** This Stipulated Order shall be effective and binding on the Parties upon the date the Central Valley Water Board, or its delegee, enters the Order.
45. **Counterpart Signatures:** This Stipulated Order may be executed and delivered in any number of counterparts, each of which when executed and delivered shall be deemed to be an original, but such counterparts shall together constitute one document.

IT IS SO STIPULATED.

California Regional Water Quality Control Board Prosecution Team
Central Valley Region

By: ORIGINAL SIGNED BY
John J. Baum
Assistant Executive Officer

12/27/2023
Date

City of Colusa

By: ORIGINAL SIGNED BY
Jesse Cain
City Manager

1/18/2024
Date

HAVING CONSIDERED THE PARTIES' STIPULATIONS, THE CENTRAL VALLEY REGIONAL WATER QUALITY CONTROL BOARD, BY AND THROUGH ITS EXECUTIVE OFFICER, FINDS THAT:

1. The foregoing Stipulation is fully incorporated herein and made part of this Order.
2. This is an action to enforce the laws and regulations administered by the Central Valley Water Board. The Central Valley Water Board finds that issuance of this Order is exempt from the provisions of the California Environmental Quality Act (Public Resources Code, sections 21000 et seq.), in accordance with section 15321, subdivision (a)(2), Title 14, of the California Code of Regulations.
3. The Executive Officer of the Central Valley Water Board is authorized to refer this matter directly to the Attorney General for enforcement if the Discharger fails to perform any of its obligations under this Order.

Pursuant to Water Code section 13323 and Government Code section 11415.60, **IT IS HEREBY ORDERED** on behalf of the California Regional Water Quality Control Board, Central Valley Region.

Patrick Pulupa
Executive Officer
Central Valley Regional Water Quality Control Board

Attachment A: Record of Violations

CITY OF COLUSA
CITY OF COLUSA WASTEWATER TREATMENT PLANT
RECORD OF VIOLATIONS (1 March 2022 – 31 December 2022) MANDATORY PENALTIES
(Data reported under Monitoring and Reporting Programs R5-2016-0062-02 and R5-2022-0020)

The following table lists the alleged violations subject to mandatory minimum penalties (MMPs), pursuant to Water Code section 13385(h) and (i).

Table A. Violations Subject to Mandatory Penalties

Item	Date	Parameter	Units	Limit	Measured	Period	Violation Type	MMP Type	CIWQS
*	2/22/2022	Total coliform	MPN/100 mL	2.2	4.5	7-day med	OEV	CHRON*	1102701
*	2/24/2022	Total coliform	MPN/100 mL	2.2	4.0	7-day med	OEV	CHRON*	1102699
*	2/28/2022	Total coliform	MPN/100 mL	2.2	13	7-day med	OEV	CHRON*	1102756
1	3/1/2022	Total coliform	MPN/100 mL	2.2	13	7-day med	OEV	CHRON	1103490
2	3/1/2022	Total coliform	MPN/100 mL	23	70	>1 in 30 days ¹	OEV	CHRON	1107291
3	3/3/2022	Total coliform	MPN/100 mL	2.2	70	7-day med	OEV	CHRON	1103493
4	3/3/2022	Total coliform	MPN/100 mL	23	130	>1 in 30 days	OEV	CHRON	1107292
5	3/7/2022	Total coliform	MPN/100 mL	2.2	130	7-day med	OEV	CHRON	1103491
6	3/7/2022	Total coliform	MPN/100 mL	23	540	>1 in 30 days	OEV	CHRON	1107293
7	3/7/2022	Total coliform	MPN/100 mL	240	540	Instantaneous maximum	OEV	CHRON	1107954
8	3/8/2022	Total coliform	MPN/100 mL	2.2	130	7-day med	OEV	CHRON	1107955
9	3/14/2022	Total coliform	MPN/100 mL	23	130	>1 in 30 days	OEV	CHRON	1107294
10	3/15/2022	Total coliform	MPN/100 mL	2.2	22	7-day med	OEV	CHRON	1103492
11	5/23/2022	Total coliform	MPN/100 mL	2.2	6.8	7-day med	OEV	CHRON	1107956
12	5/26/2022	Total coliform	MPN/100 mL	2.2	6.8	7-day med	OEV	CHRON	1107957
13	8/9/2022	Total coliform	MPN/100 mL	240	540	Instantaneous maximum	OEV	CHRON	1108717
14	10/18/2022	Total coliform	MPN/100 mL	2.2	4.5	7-day med	OEV	CHRON	1110588

* Violation was previously resolved under Administrative Civil Liabilities Order R5-2022-0505

1. The first total coliform result more than 23 MPN/100 mL in a 30-day period was 49 MPN/100mL on 2/22/2022.

VIOLATIONS AS OF:	31 December 2022
Group I Serious Violations:	0
Group II Serious Violations:	0
Non-Serious Violations Not Subject to MMPs:	0
Non-serious Violations Subject to MMPs:	14
Total Violations Subject to MMPs:	14

Mandatory Minimum Penalty Amount for Effluent Limit Violations

0 Serious Violations x \$3,000 Violation = \$0

14 Non-Serious Violation subject to MMP x \$3,000 per Violation = \$42,000

Total Expedited Payment Amount = \$42,000

Table B. Definitions

Abbreviation	Description
CAT 1	Violation of effluent limitation for Group I pollutant.
CAT 2	Violation of effluent limitation for Group II pollutant
CHRON	Chronic violation as defined by Water Code section 13385 (i). Any non-serious violation that falls within a 180-day period with three preceding violations. Thus, the fourth non-serious violation that occurs within a 180-day period is subject to MMPs.
CIWQS	California Integrated Water Quality System database. https://www.waterboards.ca.gov/water_issues/programs/ciwqs/
CTOX	Violation of chronic toxicity effluent limitation.
DREP	Deficient reporting violation. This will only result in MMPs if the report is so deficient as to make determination of compliance impossible for the reporting period.
LREP	Late Reporting violation. Every 30-Days a report is late counts as one serious late reporting violation subject to MMPs.
Measured	Reported value for the monitoring period by the Discharger.
MMP Type	Classification of the type of MMP violation.
Occurrence Date	Date that a violation occurred. For averaging period limitation violations, such as weekly and monthly averages, the last day of the reporting period is used such as last day of the week (Saturday) and last day of the month, respectively.
OEV	Violation of any constituent-specific effluent limitation not included in Group I or Group II.
NCHRON	Non-serious violation falls within the first three violations in a 180-day period, thus, not subject to MMP.
SIG	Serious Violation: For Group I pollutants that exceed the effluent limitation by 40 percent or more. For Group II pollutants that exceed the effluent limitation by 20 percent or more.