

ORDER NO. R5-2023-0502
ACCEPTANCE OF SETTLEMENT OFFER AND WAIVER OF RIGHT TO A HEARING
FOR
SIERRA JOINT COMMUNITY COLLEGE DISTRICT
SIERRA COLLEGE NEW INSTRUCTIONAL BUILDING
PLACER COUNTY

By signing below and returning this Acceptance of Settlement Offer and Waiver of Right to Hearing (Acceptance and Waiver) to the Central Valley Water Board, Sierra Joint Community College District (Discharger) hereby accepts the Settlement Offer described in the letter dated 05 October 2022 and titled Offer to Settle Administrative Civil Liability, Sierra Joint Community College District, Sierra College New Instructional Building, Placer County, WDID 5S31C394993 and waives the right to a hearing before the Central Valley Water Board to dispute the alleged violations described in the Settlement Offer and its enclosures.

The Discharger agrees that the Settlement Offer shall serve as a complaint pursuant to Article 2.5 of the Water Code and that no separate complaint is required for the Central Valley Water Board to assert jurisdiction over the alleged violations. The Discharger agrees to perform the following:

- Pay an administrative civil liability in the sum of seventy-seven thousand eight hundred forty-eight dollars (\$77,848) by cashier's check or certified check made payable to the "State Water Resources Control Board Cleanup and Abatement Account". This payment shall be deemed payment in full of any civil liability pursuant to Water Code section 13385 that might otherwise be assessed for violations described in the Settlement Offer and its enclosures.
- Fully comply with the conditions of the General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities, Order 2009-0009 DWQ (Construction General Permit) at the Sierra College New Instructional Building.

The Discharger understands that by signing this Acceptance and Waiver, the Discharger has waived its right to contest the allegations in the Settlement Offer and the civil liability amount for the alleged violation(s). The Discharger understands that this Acceptance and Waiver does not address or resolve any liability for any violation not specifically identified in the Settlement Offer and its enclosures.

Upon execution by the Discharger, the Acceptance and Waiver shall be returned to the following address:

Central Valley Regional Water Quality Control Board
Attention: Kari Holmes, Supervisor, Enforcement Section
11020 Sun Center Drive, Suite 200
Rancho Cordova, CA 95670

The Discharger understands that federal regulations require the Prosecution Team to publish notice of and provide at least 30 days for public comment on any proposed resolution of an enforcement action for violations of an NPDES permit. Accordingly, this *Acceptance and Waiver*, prior to being formally endorsed by the Central Valley Water Board Executive Officer (acting as head of the Advisory Team), will be published as required by law for public comment

If no comments are received within the notice period that cause the Prosecution Team to reconsider the Settlement Offer, then the Prosecution Team will present this *Acceptance and Waiver* to the Central Valley Water Board's Executive Officer for formal endorsement on behalf of the Central Valley Water Board.

The Discharger understands that if significant comments are received in opposition to the settlement, then the offer may be withdrawn by the Prosecution Team. If the Settlement Offer is withdrawn, then the Discharger will be notified and the Discharger's waiver pursuant to the *Acceptance and Waiver* will also be treated as withdrawn. The unresolved violation(s) will be addressed in a formal enforcement action. An administrative civil liability complaint may be issued, and the matter may be set for a hearing.

The Discharger understands that once this *Acceptance and Waiver* is formally endorsed and an Order Number is inserted, then the full payment is a condition of this *Acceptance and Waiver*. An invoice will be sent upon endorsement, and full payment will be due within 30 days of the date of the invoice.

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*.

Sierra Joint Community College District

By: Original Signed by Laura Doty

Title: Director of Facilities and Construction

Date: 02 November 2022

IT IS SO ORDERED, pursuant to California Water Code section 13385.

By: PATRICK PULUPA, Executive Officer

**Attachment A - PENALTY CALCULATION METHODOLOGY
FOR
SIERRA JOINT COMMUNITY COLLEGE DISTRICT
SIERRA COLLEGE NEW INSTRUCTIONAL BUILDING
PLACER COUNTY**

The State Water Board's *Water Quality Enforcement Policy* (Enforcement Policy) establishes a methodology for determining administrative civil liability by addressing the factors that are required to be considered under California Water Code section 13385(e). Each factor of the nine-step approach is discussed below, as is the basis for assessing the corresponding score. The [Enforcement Policy](https://www.waterboards.ca.gov/board_decisions/adopted_orders/resolutions/2017/040417_9_final%20adopted%20policy.pdf) can be found at:

(https://www.waterboards.ca.gov/board_decisions/adopted_orders/resolutions/2017/040417_9_final%20adopted%20policy.pdf)

Background

On 1 October 2021, staff from the Central Valley Regional Water Quality Control Board (Board) conducted an inspection of the Sierra Joint Community College District (Discharger) New Instructional Building construction project (Project). The Project received coverage under the State Water Resources Control Board's Waste Discharge Requirements for Discharges of Storm Water Runoff Associated with Construction and Land Disturbance Activities, Order 2009-009-DWQ, as amended by Orders 2010-2014-DWQ and 2012-006-DWQ (Construction General Permit) on 2 September 2021. Generally speaking, one of the main purposes of the Construction General Permit is to minimize the amount of pollutant discharge with storm water runoff from a construction project, especially during rain events. At the time of inspection, the Project was active and in its mass grading phase. Board Staff informed the Discharger of concerns due to large, disturbed soil areas as the Project entered the "rainy season" and alerted the Discharger that the Project needed to implement erosion control best management practices (BMPs) prior to rain events. Board Staff conducted a second inspection of the Project on 14 December 2021, during a storm event that produced over 3 inches of rain between 13 and 16 December 2021. During the inspection, Board staff observed pumping of turbid stormwater offsite and inefficient or missing erosion control BMPs on several disturbed soil areas. The turbidity of the pumped stormwater discharge measured by Board Staff was greater than 1,000 Nephelometric Turbidity Units (NTU). The Numeric Action Level (NAL) contained in the Construction General Permit is 250 NTU (Section V.B.2 of the Construction General Permit Order. The implementation of BMPs observed during the 14 December 2021 inspection did not meet the Construction General Storm Water Permit's requirement to implement best management practices that achieve best available technology economically achievable (BAT) for toxic pollutants and non-conventional pollutants and best conventional pollutant control technology (BCT) for conventional pollutants, also referred as the BAT/BCT standard.

Following the 14 December 2021 inspection, the Central Valley Water Board issued a Notice of Violation (NOV). The NOV required the Discharger to correct all the violations documented during the inspection, and to upload all inspection reports conducted by the Project's Qualified Storm Water Pollution Prevention Plan Practitioner (QSP) leading up to the December 2021 storm event as well as submit documentation of corrective actions taken

following the storm events. Review of the inspection reports and accompanying photos showed that the Project did not have BMPs that met the BAT/BCT requirement between storm events recorded from 22 October 2021 through 16 December 2021. The Project is assumed to have returned to compliance by December 23 December 2021 based on the inspection and sampling reports prepared by the QSP, which showed no issues or violations, and turbidity results below the NAL.

Violation 1 – Failure to minimize or prevent pollutants in storm water discharges in violation of Construction General Permit

Pursuant to the Construction General Permit, dischargers are required to minimize or prevent pollutants in storm water using controls, structures and management practices that achieve the BAT/BCT standard.

There were thirteen days of precipitation between 18 October 2021 and 16 December 2021, six of which produced greater than 0.5 inches of rain. The Prosecution Team alleges that storm water discharged from the Project on days with greater than 0.5 inches of precipitation and that on the six days that there was stormwater discharge, the BMPs installed did not meet the BAT/BCT standard, in violation of the General Permit. Attachment D, section A.1.b, Effluent Standards, in the General Permit states: *Dischargers shall minimize or prevent pollutants in storm water discharges and authorized non-storm water discharges through the use of controls, structures, and management practices that achieve BAT for toxic and non-conventional pollutants and BCT for conventional pollutants.*

PENALTY FACTOR	VALUE	DISCUSSION
Step 1, Factor 1: The degree of Toxicity of the Discharge (physical, chemical, biological, or thermal characteristics of the discharge)	2	Discharges of turbidity, such as those described herein, cloud the receiving water (which reduces the amount of sunlight reaching aquatic plants), clog fish gills, smother aquatic habitat and spawning areas, and impede navigation. Sediment can also transport other materials such as nutrients, metals, and oils and grease, which can also negatively impact aquatic life and aquatic habitat.
Step 1, Factor 2: Actual Harm or Potential harm to beneficial uses (harm or potential for harm to beneficial uses)	3	The project discharges directly to Secret Ravine, which is part of the Sacramento River watershed. The Beneficial uses of the Sacramento River watershed include warm and cold-water aquatic freshwater habitat, spawning, and migration as well as wildlife habitat. In addition, Secret Ravine is identified as salmon habitat which sustains salmon spawning and migration. Project conditions documented in photographs during days of precipitation, and the turbidity samples collected during the 14 December 2021 inspection show turbid discharges or evidence of turbid discharge from the Project. Due to the dilution expected

PENALTY FACTOR	VALUE	DISCUSSION
		between the discharge locations and Secret Ravine, the discharge was expected to have a moderate impact to beneficial uses. Moderate potential for harm is defined by the Enforcement Policy as reasonably expected to have potential impacts, but harm or potential harm to beneficial uses is moderate and likely to attenuate without appreciable medium or long term acute or chronic effects.
Step 1, Factor 3: Susceptibility to Cleanup or Abatement	1	The sediment from the turbid discharge was deposited over a long distance and cleanup or abatement of 50% or more of the material would not be possible. Therefore, a score of 1 is appropriate.
Step 1, Final Score: Potential for Harm	6	The Potential for Harm score is the sum of Factors 1 through 3 of Step 1, shown above. The Total Potential for Harm score is $2+3+1 = 6$
Step 2: Per Gallon and per Day factor for Discharge Violations	0.15	The "Deviation from Requirement" is moderate because the Discharger partially implemented erosion and sediment control BMPs. The slopes leaving the Project had been protected with erosion control blankets, but the rest of the Project remained unprotected and out of compliance with the BAT/BCT requirement. The Potential for Harm from step one of five, and the Major Deviation was used to determine both the per gallon and per day factors of 0.15 from Tables 1 and 2 of the Enforcement Policy.
Step 2: Volume discharged	n/a	The Prosecution Team did not to calculate the discharge volume at this time. The Prosecution Team reserves the right to include the volume discharged in the penalty calculation should this matter proceed to hearing.
Step 2: Adjustment for high volume discharges	n/a	The Prosecution Team chose not to calculate the discharge volume at this time. The Prosecution Team reserves the right to assess penalties for the volume discharged should this matter proceed to hearing.
Step 2: Days of discharge considered	6	According to rainfall data from station "CA-PC-35 Rocklin 2.5 W", there were six days with over $\frac{1}{2}$ " inches of rainfall between 22 October 2021 and 16 December 2021. The Prosecution Team alleges that the Project discharged on days with greater

PENALTY FACTOR	VALUE	DISCUSSION
		than 1/2" inches of rainfall without BMPs that met the BAT/BCT requirement during that period.
Step 2: Initial Liability for Violation #1	\$9,000	The liability is calculated as the per day factor multiplied by the number of days multiplied by the maximum liability per day (6 days x 0.15 x \$10,000/day = \$9,000).
Step 3: Per Day Assessments for Non-Discharge Violations	N/A	This step does not apply to this violation as it is a discharge violation
Step 4: Adjustments for Discharger Conduct: Culpability	1.2	The Discharger has retained the services of a Qualified SWPPP Developer and Practitioner who is responsible for advising the Discharger on what BMPs are required to be installed to meet the requirements of the Construction General Permit. Board staff inspected the Project on 1 October 2021, well ahead of the forecasted storm event for 20 October 2021, and communicated the requirements for Risk Level 2 projects to the Discharger. Therefore, an adjustment factor of 1.2 was deemed appropriate.
Step 4: Adjustments for Discharger Conduct: History of Violations	1.0	Water Board staff is not aware of previous violations by the Discharger related to the Construction General Permit. Therefore, a neutral factor of 1.0 is appropriate.
Step 4: Adjustments for Discharger Conduct: Cleanup and Cooperation	1.0	The Discharger's response to return into compliance after the 14 December 2021 inspection and NOV was reasonable and what is expected of Dischargers. Therefore, a neutral factor of 1.0 is appropriate.
Step 1-4: Total Base Liability for Violation #1	\$10,800	The base liability is calculated as the initial liability multiplied by each of the above three factors (\$9,000 x 1.2 x 1 x 1) = 10,800).

Violation 2 – Failure to implement erosion control BMPs on active areas

During the site inspection on 14 December 2021, Board staff observed that the Risk Level 2 Project had large areas of disturbed soil without erosion control BMPs during a storm event. There were thirteen days of precipitation between 18 October 2021 and 16 December 2021, twelve of which had precipitation greater than 0.1 inches. The Prosecution team alleges that the Project was in violation of the erosion control for active areas requirement on days with greater than 0.1 inches of precipitation. Attachment D, section E.3, Sediment Control, in the General Permit states: *Risk Level 2 dischargers shall implement appropriate erosion control BMPs (runoff control and soil stabilization) in conjunction with sediment control BMPs for areas under active construction.*

PENALTY FACTOR	VALUE	DISCUSSION
Step 1: Actual Harm or Potential for Harm for Discharge Violations	N/A	This step is not applicable because the violation is not a discharge violation.
Step 2: Per Gallon and Per Day Assessments for Discharge Violations	N/A	This step is not applicable because the violation is not a discharge violation.
Step 3, Non - Discharge Violations: Potential for harm	Moderate	Erosion and sediment control BMPs were partially deployed throughout the Project. Failure to entirely install appropriate erosion controls contributed to the discharge of turbid, sediment laden water. Discharges of sediment can cloud the receiving water (which reduces the amount of sunlight reaching aquatic plants), clog fish gills, smother aquatic habitat and spawning areas, and impede navigation. Sediment can also transport other materials such as nutrients, metals, and oils and grease, which can also negatively impact aquatic life and aquatic habitat.
Step 3, Non-Discharge Violations: Deviation from Requirement	Moderate	The “Deviation from Requirement” is moderate because the Discharger partially implement required erosion control BMPs for disturbed areas prior to a forecasted storm event but left several disturbed soil areas unprotected, rendering the permit’s requirement only partially achieved.
Step 3, Non-discharge Violations: Per day Factor	0.35	The value of 0.35 was determined from Table 3 in the Enforcement Policy. The middle value was chosen at this time.
Step 3, Non-Discharge Violation, Days of Violation	12	The Discharger is required to implement erosion control BMPs on all disturbed soil areas prior to all rain events. The Prosecution Team is alleging that the Discharger was in violation of the erosion control BMP requirement on all days with greater than 0.1 inches of precipitation. During the period between 18 October 2021 and 16 December 2021, there were twelve days of rainfall with greater than 0.1 inches of rain. The Project was assumed to have returned into compliance on 23 December 2021 based on inspection and sampling reports from the Project’s QSP.
Step 3: Initial Liability for Violation #2	\$42,000	The liability is calculated as the per day factor multiplied by the number of days multiplied by the maximum liability per day (0.35 x 12 x \$10,000/day = \$42,000).

PENALTY FACTOR	VALUE	DISCUSSION
Step 4, Adjustments for Discharger Conduct Culpability	1.2	The Discharger has retained the services of a Qualified SWPPP Developer and Practitioner who is responsible for advising the Discharger on what BMPs= are required to be installed to meet the requirements of the Construction General Permit. Board staff inspected the Project on 1 October 2021, well ahead of the forecasted storm event for 20 October 2021 and communicated the requirements for Risk Level 2 projects to the Discharger.
Step 4, Adjustments for Discharger Conduct Culpability: History of Violations	1.0	The Central Valley Water Board has not previously issued any Administrative Civil Liability Orders against this Discharger; therefore, a neutral factor of 1.0 is appropriate.
Step 4, Adjustments for Discharger Conduct Cleanup and Cooperation	1.0	The Discharger’s response to return into compliance after the 14 December 2021 inspection and NOV was reasonable and what is expected of Dischargers. Therefore, a neutral factor of 1.0 is appropriate.
Total Base Liability for Violation #2	\$50,400	The base liability is calculated as the initial liability multiplied by each of the above three factors (\$42,000 X 1,2 X 1 X 1 = \$50,400).

Violation 3 – Failure to Sample

During the site inspection on 14 December 2021, Water Board Staff observed that turbid stormwater was being pumped from a Risk Level 2 Project offsite without it being sampled. The Prosecution Team alleges that the Discharger was in violation of the sampling requirements of the Construction General Permit on 14 December 2021. Attachment D, Section I.4.a of the Construction General Permit requires that *Risk Level 2 dischargers shall collect storm water grab samples from sampling locations, as defined in Section I.5. The storm water grab sample(s) obtained shall be representative of the flow and characteristics of the discharge.*

PENALTY FACTOR	VALUE	DISCUSSION
Step 1: Actual Harm or Potential for Harm for Discharge Violations	N/A	This step is not applicable because the violation is not a discharge violation.
Step 2: Per Gallon and Per Day Assessments for Discharge Violations	N/A	This step is not applicable because the violation is not a discharge violation.
Step 3, Non - Discharge Violations: Potential for harm	Major	Discharges of turbidity can cloud the receiving water (which reduces the amount of sunlight reaching aquatic plants), clog fish gills, smother aquatic habitat

PENALTY FACTOR	VALUE	DISCUSSION
		and spawning areas, and impede navigation. Sediment can also transport other materials such as nutrients, metals, and oils and grease, which can also negatively impact aquatic life and aquatic habitat.
Step 3, Non-Discharge Violations: Deviation from Requirement	Major	The "Deviation from Requirement" is Major because the Discharger failed to sample the discharged stormwater, rendering the permit requirement ineffective.
Step 3, Non-discharge Violations: Per day Factor	0.85	The value of 0.85 was determined from Table 3 in the Enforcement Policy. The middle value was chosen at this time.
Step 3, Non - discharge Violations: Days of Violation	1	The Prosecution Team alleges that the Discharger was in violation of the sampling requirement on 14 December 2021, the day when pumping practices were observed without sampling.
Initial Liability for Violation #2	\$8,500	The liability is calculated as the per day factor multiplied by the number of days multiplied by the maximum liability per day ($0.85 \times 1 \text{ day} \times \$10,000/\text{day} = \$8,500$).
Step 4: Adjustments for Discharger Conduct Culpability	1.2	The Discharger has retained the services of a Qualified SWPPP Developer and Practitioner who is responsible for advising the Discharger requirements of the Construction General Permit. The Discharger and/or contractors pumping stormwater should be aware of the sampling requirement; therefore, a factor of 1.2 was assigned for this violation.
Step 4: Adjustments for Discharger Conduct History of Violations	1.0	The Central Valley Water Board has not previously issued any Administrative Civil Liability Orders against this Discharger; therefore, a neutral factor of 1.0 is appropriate.
Step 4: Adjustments for Discharger Conduct Cleanup and Cooperation	1.0	The Discharger's response to return to compliance after the 14 December 2021 inspection and NOV was reasonable and what is expected of Dischargers. Therefore, a neutral factor of 1.0 is appropriate.
Total Base Liability for Violation #3	\$10,000	The base liability calculated as the initial liability multiplied by each of the above three factors exceeds the maximum liability ($\$8,500 \times 1.2 \times 1 \times 1 = \$10,200$). Therefore, the liability stands at \$10,000.

Other Factor Considerations

Total Base Liability for all violations is \$71,200 (\$10,800 for Violation # 1 + \$50,400 for Violation # 2 + \$10,000 for Violation # 3 = \$71,200). The Enforcement Policy states that five other factors must be considered before obtaining the final liability amount.

OTHER FACTORS	VALUE	CONSIDERATIONS
Step 6: Ability to pay and Continue in Business	No adjustment	Board staff does not have information suggesting that the Discharger cannot pay the proposed penalty and continue in business.
Step 7: Economic Benefit	\$542	Board staff estimated the economic benefit for each violation. The cost of installing BMPs which would have avoided violations 1 and 2 were estimated at \$6,171. Since these BMPs were installed following the violations, this cost was considered a delayed cost. In addition, the missed monitoring in violation 3 was considered an avoided cost, estimated at \$500. The economic benefit of the delayed and avoided costs was estimated using the EPA's BEN model. Calculations showing the estimated Economic Benefit are included as Attachment A.
Step 8: Other Factors as Justice may Require	\$6,684	The costs of investigation and enforcement are "other factors as justice may require" and are added to the liability amount. The Central Valley Water Board has incurred approximately \$6,648 in staff costs associated with the investigation and enforcement of the alleged violations. The estimated staff costs used in Step 8 are included as Attachment B.
Maximum liability	\$190,000	Based on California Water Code section 13385, the maximum liability is \$10,000 per day per violation and \$10 per gallon. The maximum penalty of \$190,000 is calculated using only days of violation (19 days x \$10,000 per day) and does not include gallons discharged as the Prosecution Team has not estimated the discharged volume. The Prosecution Team reserves the right to include the volume discharged in the penalty calculation should this matter proceed to hearing. In addition, the Prosecution Team reserves the right to assess penalties for other violations observed during the 14 December 2021 inspection that were not included in this settlement if this matter proceeds to hearing.
Minimum liability	\$596	Based on California Water Code section 13385, civil liability must be at least the economic benefit of non-compliance. Per the Enforcement Policy, the minimum liability is to be the economic benefit plus 10%.

OTHER FACTORS	VALUE	CONSIDERATIONS
Final Liability	\$77,848	The final liability amount is the total base liability plus any adjustment for the ability to pay, economic benefit, and other factors. The final liability must be more than the minimum liability but cannot exceed the maximum liability. The Final Liability is $\$71,200 + \$6,648 = \$77,848$

- Attachments:
- A. Economic Benefit Calculation
 - B. Staff Cost Estimate

Economic Benefit Analysis									
Sierra College									
Compliance Action	One-Time Non-Depreciable Expenditure				Non-Compliance Date	Compliance Date	Penalty Payment Date	Discount Rate	Benefit of Non-Compliance
	Amount	Basis	Date	Delayed?					
Hydromulch with Tackifier	\$ 5,671	CCI	10/6/2021	Y	10/22/2021	12/23/2021	12/25/2022	3.10%	22
Mobilization of BMP Installer	\$ 500	CCI	10/6/2021	Y	10/22/2021	12/23/2021	12/25/2022	3.10%	2
Failure to Sample	\$ 500	CCI	10/6/2021	N	10/22/2021	12/23/2021	12/25/2022	3.10%	518
Income Tax Schedule: Not-For-Profit								Total Benefit: \$ 542	
USEPA BEN Model Version: Version 2022.0.0 (June 2022)									
Analyst: Jennifer McGovern, Valaree St. Mary									
Date/Time of Analysis: 9/28/22 12:00									
Assumptions:									
<ul style="list-style-type: none"> o Cost estimates and compliance actions provided by Regional Board Staff o Failure to implement construction BMPs which included hydromulch with tackifier and mobilization of BMP installer was delayed, not avoided o Failure to sample was an avoided cost o BMP installation adjusted using the construction cost index (CCI) o Non-compliance and compliance dates for each compliance action provided by Regional Board Staff o The penalty payment date is assumed to be 3 months from the date of analysis o The discharger is assumed to operate as a not-for-profit entity 									

Table 1. Staff Cost Summary

	Quantity	Unit Cost	Total Cost
Inspections	2	\$ 236.33	\$ 472.65
Inspection Reports	2	\$ 549.82	\$ 1,099.65
Notice of Violations	1	\$ 390.67	\$ 390.67
ACL Prep	1	\$ 4,685.79	\$ 4,685.79
Total Staff Costs		\$ 6,648.76	

Table 2. Staff Cost Calculation

Inspection	Hours ¹	Ave Cost/Hour ²	Cost
Water Resource Control Engineer	2	\$ 118.16	\$ 236.33
Senior Environmental Scientist	0	\$ 154.34	\$ -
Supervising Water Resources Control Engineer	0	\$ 179.32	\$ -
Assistant Executive Officer	0	\$ 185.26	\$ -
Cost per Inspection			\$ 236.33
Inspection Report	Hours	Ave Cost/Hour	Cost
Water Resource Control Engineer	4	\$ 118.16	\$ 472.65
Senior Environmental Scientist	0.5	\$ 154.34	\$ 77.17
Supervising Water Resources Control Engineer	0	\$ 179.32	\$ -
Assistant Executive Officer	0	\$ 185.26	\$ -
Cost per Inspection Report			\$ 549.82
Notice of Violation	Hours	Ave Cost/Hour	Cost
Water Resource Control Engineer	2	\$ 118.16	\$ 236.33
Senior Environmental Scientist	1	\$ 154.34	\$ 154.34
Supervising Water Resources Control Engineer	0	\$ 179.32	\$ -
Assistant Executive Officer	0	\$ 185.26	\$ -
Cost per Notice of Violation			\$ 390.67
ACL Preparation	Hours	Ave Cost/Hour	Cost
Water Resource Control Engineer	20	\$ 118.16	\$ 2,363.27
Senior Environmental Scientist	8	\$ 154.34	\$ 1,234.72
Supervising Water Resources Control Engineer	4	\$ 179.32	\$ 717.28
Assistant Executive Officer	2	\$ 185.26	\$ 370.52
Cost per Notice of Violation			\$ 4,685.79

Notes:

- 1 Inspection Time includes in-office pre-inspection research and drive time.
- 2 Hourly costs from SWRCB Office of Enforcement Fiscal Year 2020-2021 Billing Costs Summary, mid range salary used.