

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

In the Matter of:

ORDER R5-2020-0502

**CITY OF DUNSMUIR
WASTEWATER TREATMENT PLANT
SHASTA AND SISKIYOU COUNTIES**

**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 or Water Board), on behalf of the Central Valley Water Board Prosecution Team (Prosecution Team), and City of Dunsmuir (City or 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. On 4 October 2012, the Central Valley Water Board adopted WDRs Order R5-2012-0085 (NPDES No. CA0078441), effective 23 November 2012, which contained new requirements and rescinded WDRs Order R5-2006-0129, except for enforcement purposes.
3. On 28 July 2017, Central Valley Water Board staff issued the Discharger a Notice of Violation for total coliform effluent violations that occurred between 30 November 2016 and 22 March 2017. On 25 August 2017, the Discharger responded to the NOV and requested that the MMPs be applied toward a compliance project to offset the MMPs, as allowed by Water Code section 13385(k).
4. On 7 December 2018, Central Valley Water Board staff issued the Discharger a Notice of Violation for ammonia, biochemical oxygen demand, and total suspended solids effluent violations that occurred between 10 May 2017 and 31 May 2017. On 3 January 2019, the Discharger responded to the NOV and

requested that the MMPs be applied toward a compliance project to offset the MMPs, as allowed by Water Code section 13385(k).

5. WDRs Order R5-2012-0085, section IV.A.1, includes, in part, the following effluent limitations:

a. The Discharger shall maintain compliance with the following effluent limitations at Discharge Point 001, unless otherwise specified, with compliance measured at Monitoring Location EFF-001.

Table A - Effluent Limitations

Parameter	Units	Average Monthly Effluent limitation	Average Weekly Effluent limitation	Average Weekly Effluent limitation
Biochemical Oxygen Demand 5-day @ 20 °C	mg/L	10	15	20
Total Suspended Solids	mg/L	10	15	20
Ammonia Nitrogen Total (as N)	mg/L	21.9		21.9

e. **Total Coliform Organisms.** From 16 November through 30 April effluent total coliform organisms shall not exceed:

- I. 23 most probable number (MPN) per 100 mL, as a 7-day median; and
- II. 240 MPN/100 mL, at any time.

6. Water Code section 13385, subdivisions (h) and (i) require assessment of mandatory penalties 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

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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) 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

7. According to the Discharger’s self-monitoring reports, the Discharger committed three (3) non-serious violations not subject to MMPs, five (5) serious Group I violations, and five (5) non-serious violations subject to MMPs of the above effluent limitations contained in WDRs Order R5-2012-0085 as shown in Attachment A. Three (3) non-serious violations are not subject to mandatory penalties because these violations fall within the first three violations in a 180-day period. Five (5) non-serious violations are subject to mandatory penalties 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. The

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five (5) serious Group I violations are defined as serious because the measured concentration of the Group I constituents exceeded maximum prescribed levels by more than 40 percent. The mandatory minimum penalty for these violations is **thirty thousand dollars (\$30,000)**.

8. The total amount of the mandatory minimum penalties assessed for the alleged effluent violations is **thirty thousand dollars (\$30,000)**. As stated herein, a detailed list of the alleged effluent violations is included in Attachment A.
9. Water Code section 13385 (k) states:
 - (1) In lieu of assessing all or a portion of the mandatory minimum penalties pursuant to 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 2010 State Water Resources Control Board's Water Quality Enforcement Policy (Enforcement Policy), 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 10,000 persons or fewer or a rural county, with a financial hardship as determined by the state board after considering such factors as median income of the residents, rate of unemployment, or low population density in the service area of the publicly owned treatment works.

10. Under the 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.
11. 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.
12. 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 Discharger serves a population of 1,650 with a median household income (MHI) of \$35,208, which is 52% of the statewide MHI, according to the 2013-2017 American Community Survey 5-Year Estimates.
13. On 11 September 2019, the Discharger submitted information about the following compliance projects: a chlorine room redesign evaluation and ultraviolet disinfection study; installation of a sodium hypochlorite dosing station, coliform sampling station, and a free chlorine analyzer; implementation of a FOG ordinance, and setting up a CCTV system to investigate the potential connection of an area storm drain to the collection system and source of inflow and infiltration. Two of the projects, the chlorine room redesign/UV study and the FOG ordinance, have already been completed. The free chlorine analyzer is in the process of being ordered, due to a long lead time, and the other projects will be completed within 18 months of the issuance of this Order. Additional information and requirements for the compliance project is contained in Attachment B of this Order.
14. Board staff finds that the proposed compliance project qualifies as a compliance project within the meaning of Water Code section 13385 (k) because it will remedy future violations for ammonia, biochemical oxygen demand, total coliform and total suspended solids. The amount that the Discharger will expend on the

compliance project is in excess of the mandatory minimum penalty that the Board is required to assess under Water Code sections 13385(h) and (i) for the violations listed in Attachment A of this Order.

15. 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 imposition of an ACL in the amount of **thirty thousand dollars (\$30,000)** in MMPs against the Discharger. The entire **thirty thousand dollars (\$30,000)** penalty will be satisfied through the completion of the compliance project described in Attachment B of this Order.

16. 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:

17. **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 to this Stipulation.

18. **Administrative Civil Liability:**

A) The Discharger hereby agrees to the imposition of an ACL in the amount of **thirty thousand dollars (\$30,000)** to the Central Valley Water Board to resolve the violation specifically alleged in Attachment A to this Order.

B) The entire **thirty thousand-dollar (\$30,000)** penalty has been satisfied through the completion of the Compliance Project described in Finding 13, in accordance with Water Code section 13385(k) incorporated herein by reference. In accordance with Water Code section 13385(k), mandatory

penalties (i.e., \$30,000) shall be permanently suspended upon adoption of this Order.

19. Representations and Agreements: The Discharger understands that the completed Compliance Project is a material condition of this settlement of liability between the Discharger and the Central Valley Water Board Prosecution Team. As a material consideration for the Central Valley Water Board's acceptance of this Stipulated Order, the Discharger represents and agrees that, in accordance with Water Code section 13385, subdivision (k)(1).

- A) The Compliance Project designed to correct the violations within five years.
- B) The Compliance Project is in accordance with the Enforcement Policy of the state board:
 - i. The Central Valley Water Board will not authorize additional compliance projects for the project the Discharger completed as described above, except under unusual circumstances.
 - ii. The Discharger agrees that the Central Valley Water Board has the right to require a third-party audit of the funds expended by it to implement the Compliance Project; and
 - iii. The Discharger shall permit inspection of the Compliance Project by Central Valley Water Board staff during normal business hours, at any location where the Compliance Project is being implemented, as well as review of any documents associated with implementation of the Compliance Project, at any time without notice.

20. Third Party Financial Audit of Compliance Project: At the written request of the Central Valley Water Board, the Discharger, at its sole cost, shall submit a report prepared by an independent third party(ies) acceptable to the Central Valley Water Board providing such party's(ies's) professional opinion that the Discharger has expended money in the amounts claimed by the Discharger. The written request shall specify the reasons why the audit is being requested. The audit report shall be provided to the Central Valley Water Board within six (6) months of notice from the Central Valley Water Board to the Discharger of the

need for an independent third-party audit. The audit need not address any costs incurred by the Central Valley Water Board for oversight.

21. 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.

22. Party Contacts for Communications Related to Stipulated Order:

FOR THE CENTRAL VALLEY WATER BOARD:

Michael Collins, Water Resource Control Engineer
NPDES Unit
364 Knollcrest Drive, Suite 205
Redding, CA 96002
(530) 224-4785
Michael.Collins@waterboards.ca.gov

FOR THE DISCHARGER:

Todd Juhasz, City Manager
City of Dunsmuir
5915 Dunsmuir Avenue
Dunsmuir, CA 96025

23. 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.

24. 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

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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.

25. **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 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.
26. **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.
27. **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.
28. **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.
29. **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.

30. **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.
31. **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.
32. **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.
33. **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 right, if any, to appeal

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the same to a California Superior Court and/or any California appellate level court.

34. **Covenant Not to Sue:** Upon the effective date of this Stipulated Order, the 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.
35. **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 Order.
36. **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.
37. **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.
38. **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.

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39. **Severability:** This Stipulated Order is severable; should any provision be found invalid the remainder shall remain in full force and effect.
40. **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.
41. **Counterpart Signatures:** This 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.

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IT IS SO STIPULATED.

California Regional Water Quality Control Board Prosecution Team
Central Valley Region

By: Original Signed By Bryan Smith (for)
Clint E. Snyder, P.G.
Assistant Executive Officer

11/22/2019
Date

City of Dunsmuir

By: Original Signed By
Todd Juhasz
City Manager

11/18/2019
Date

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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

January 15, 2020

Enclosures (2):

Attachment A: Record of Violations

Attachment B: Compliance Project Description

**R5-2020-0502 - ATTACHMENT A
RECORD OF VIOLATIONS FOR ASSESSING MANDATORY MINIMUM PENALTIES**

**City of Dunsmuir
Wastewater Treatment Plant**

RECORD OF VIOLATIONS (30 November 2016 – 31 May 2017) MANDATORY PENALTIES
(Data reported under Monitoring and Reporting Programs R5 2012-0085)

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 minimum penalties

Item	Date	Parameter	Units	Limit	Measured	Period	Violation Type	MMP Type	CIWQS
1	30-Nov-16	Total Coliform	MPN/100 mL	23	80	7-Day Median	OEV	NCHRON	1023771
2	2-Dec-16	Total Coliform	MPN/100 mL	23	80	7-Day Median	OEV	NCHRON	1019211
3	14-Dec-16	Total Coliform	MPN/100 mL	23	140	7-Day Median	OEV	NCHRON	1019213
4	7-Jan-17	Total Coliform	MPN/100 mL	23	170	7-Day Median	OEV	CHRON	1021505
5	11-Jan-17	Total Coliform	MPN/100 mL	240	300	Daily Max	OEV	CHRON	1021504
6	11-Jan-17	Total Coliform	MPN/100 mL	23	235	7-Day Median	OEV	CHRON	1024628
7	22-Mar-17	Total Coliform	MPN/100 mL	23	50	7-Day Median	OEV	CHRON	1024393
8	10-May-17	Biochemical Oxygen Demand	mg/L	20	41	Final MDEL	CAT 1	SIG	1049581
9	10-May-17	Biochemical Oxygen Demand	mg/L	15	41	Final AWEL	CAT 1	SIG	1027712

**R5-2020-0502 - ATTACHMENT A
RECORD OF VIOLATIONS FOR ASSESSING MANDATORY MINIMUM PENALTIES**

Item	Date	Parameter	Units	Limit	Measured	Period	Violation Type	MMP Type	CIWQS
10	10-May-17	Total Suspended Solids	mg/L	15	16.8	Final AWEL	CAT 1	CHRON	1027713
11	31-May-17	Ammonia, Total (as N)	mg/L	21.9	28.2	Final MDEL	CAT 1	SIG	1050291
12	31-May-17	Ammonia, Total (as N)	mg/L	21.9	28.2	Final AMEL	CAT 1	SIG	1050292
13	31-May-17	Biochemical Oxygen Demand	mg/L	10	24.5	Final AMEL	CAT 1	SIG	1049582

EXPEDITED PAYMENT AMOUNT VIOLATIONS SUMMARY:

VIOLATIONS AS OF: 5/31/2017

Group I Serious Violations:	5
Group II Serious Violations:	0
Non-Serious Violations Not Subject to MMPs:	3
<u>Non-serious Violations Subject to MMPs:</u>	<u>5</u>
Total Violations Subject to MMPs:	10

Mandatory Minimum Penalty Amount for Effluent Limit Violation(s)

5 Serious Group II Violation(s) x \$3,000 Violation = \$15,000

5 Non-Serious Violation subject to MMP x \$3,000 per Violation = \$15,000

Total Expedited Mandatory Minimum Penalty = \$30,000

R5-2020-0502 - ATTACHMENT A
RECORD OF VIOLATIONS FOR ASSESSING MANDATORY MINIMUM PENALTIES

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 (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.

**R5-2020-0502 - ATTACHMENT B
COMPLIANCE PROJECT DESCRIPTION**

Compliance Project Description

Project Title: City of Dunsmuir WWTP Compliance Project

Geographic Area of Interest: City of Dunsmuir Wastewater Treatment Plant, Shasta Siskiyou Counties

Name of Responsible Entity: City of Dunsmuir

Contact Information:

Ron LaRue, Designated Operator in Charge
City of Dunsmuir WWTP
1100 South First Street
Dunsmuir, CA 96025
(530) 925-0871
wwtp@ci.dunsmuir.ca.us

Project Description:

The City had their consultant, PACE Engineering, evaluate an upgrade to their WWTP Chlorine Room in 2018. During this effort, it was determined that adding two additional chlorine cylinders would require the entire building to be brought up to current building codes, which was determined to be economically infeasible.

The City has collected daily grab samples of the effluent free chlorine since 17 January 2017, and ultraviolet transmittance (UVT) samples from 6 December 2017 to 18 December 2018. These samples were used to evaluate alternatives to chlorine gas for effluent disinfection. The City found the free chlorine fluctuated significantly, and it would be difficult to dose the effluent solely based on free chlorine but found this information helpful in determining breakpoint chlorination and when their effluent is requiring more chlorine than what is shown by total chlorine residual. The UVT results were promising, but during summer months, algae grows in the traveling bridge filter(s), and without chlorine, UVT results become less optimal. In addition, some research has shown inconsistent treatment of effluent wastewater with UV; therefore, it was determined to continue with chlorine gas. The City plans to install a free chlorine analyzer, post chlorine contact chamber, to further assist in determining breakpoint chlorination. This project addresses coliform effluent limit violations with the goal of improving the reliability of the disinfection process.

The City's vendor of chlorine gas changed a couple of years ago and is now based out of Sacramento. The City has experienced issues with the vendor providing consistent

R5-2020-0502 - ATTACHMENT B COMPLIANCE PROJECT DESCRIPTION

deliveries during the winter months when demand is high. Therefore, the City implemented a temporary liquid sodium hypochlorite dosing station last winter. As such, the City would like to implement a permanent sodium hypochlorite dosing station for trimming the chlorine demand during high flow/demand periods, which would further improve the reliability of the disinfection process. In the event the City's existing sulfur dioxide cannot meet the demand with the addition of sodium hypochlorite, the automatic butterfly valve to the River will close when a chlorine residual is detected. If the City needed to resume discharge to the River, they have a back-up pump available to dose sodium thiosulfate.

The City currently collects their coliform sample from the effluent wet well vault as the water flows over the effluent weir. This requires the operator to climb into the effluent wet well to collect a sample. As such, the City would like to install an above-ground sampling station. The City plans to complete duplicate sampling for 3 weeks to gain confidence in the sampling station.

Around 28 April 2017, the City observed a large plume of toilet paper and sheen at the surface of the oxidation ditch. The City suspects this was due to an unauthorized dump into the collection system. Initially, effluent quality remained stable, which made the City believe the plant was able to handle the unauthorized dump. However, on 10 May 2017, the City completed monthly sampling and had several violations. The City has since adopted a new Fats, Oils, and Grease (FOG) Ordinance and sent public outreach flyers regarding FOG, wipes, etc. The City is also implementing Industrial Use Permits for new facilities coming to Dunsmuir, such as cannabis growers and breweries. These efforts address BOD and ammonia effluent limit violations with the goal of reducing or eliminating highly concentrated loads from entering the WWTP.

The City has historically had significant I&I and has been trying to identify key areas to replace mainlines that would have the largest impact on reducing I&I. The WWTP has seen instantaneous peaks on the influent reach 2.4 MGD. The City has recently completed some I&I monitoring and smoke testing. Smoke testing of portions of the City's collection system revealed a potential connection of an area drain to the City's collection system. The City would like to CCTV that portion of the collection system and further investigate this possible connection. From there, they will be able to potentially correct the connection and reduce one source of I&I to the system.

Estimated Cost of Project Completion:

The estimated project cost is \$34,493. The \$30,000 of MMPs associated with this Order will be used to fund the proposed improvements.

**R5-2020-0502 - ATTACHMENT B
COMPLIANCE PROJECT DESCRIPTION**

Water body, beneficial use and/or pollutant addressed by this project:

The compliance project will allow Operators to potentially reduce coliform, BOD, TSS, and ammonia in the effluent that is discharged to the Sacramento River.

Project Schedule, Budget, and Deliverables:

The City will submit quarterly progress reports summarizing construction as described above. All improvements shall be completed within 18 months of compliance project approval. The City will submit a post-project accounting of all expenditures. The accounting shall clearly show whether the final cost of the completed compliance project is less than, equal to, or more than the suspended liability of \$30,000.

Table C - Estimated Project Cost

No.	Item	Cost
1	PACE Billings to redesign Chlorine Room (already incurred)	\$4,436
2	Sodium Hypochlorite Dosing Station	\$7,230
3	Coliform Sampling Station	\$3,115
4	Free Chlorine Analyzer	\$16,600
5	CCTV Area Drain on Pine & Dunsmuir Ave by City Staff	\$1,280
6	New FOG Ordinance and Public Outreach (already incurred)	\$1,832
--	Total Cost	\$34,493