

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

In the Matter of:

ORDER R5-2026-0530

**CITY OF CORNING
WASTEWATER TREATMENT PLANT
TEHAMA COUNTY**

**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 City of Corning (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. This Stipulated Order resolves the violations alleged herein by the imposition of administrative civil liability against the Discharger in the amount of twenty-four thousand dollars (\$24,000) which will be suspended upon completion of the compliance project described in Attachment B of this Order.

II. Recitals

2. The Discharger owns and operates the City of Corning Wastewater Treatment Plant (Facility), which provides sewerage service to approximately 8,069 residents. The Facility discharges treated domestic wastewater to the Sacramento River, a water of the United States.
3. On 21 April 2022, the Central Valley Water Board adopted WDRs Order R5-2022-0022 (NPDES No. CA0004995), to regulate the Facility, which requires, among other things, compliance with effluent limitations at Discharge Point D-001.
4. On 23 August 2024, Central Valley Water Board staff issued the Discharger a Notice of Violation (NOV) for total coliform violations that occurred between March 2024 and June 2024. On 7 March 2025, the Discharger responded to the NOV and requested that the mandatory minimum penalties (MMPs) be applied toward a compliance project to offset the MMPs, as allowed by Water Code section 13385(k).

5. WDRs Order R5-2022-0022, section IV.A.1, includes, in part, the following effluent limitations:

- f. **Total Coliform Organisms.** Effluent total coliform organisms shall not exceed the following with compliance measured immediately after disinfection:
 - i. 23 most probable number per 100 milliliter (MPN/100 mL, as a 7-day median, and
 - ii. 240 MPN/100mL, more than once in any 30-day period.

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

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:

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, and eight (8) non-serious violations subject to MMPs of the above effluent limitations contained in WDRs Order R5-2022-0022 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. Eight (8) 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 mandatory minimum penalty for these violations is **twenty-four thousand dollars (\$24,000)**.
8. The total amount of the mandatory minimum penalties assessed for the alleged effluent violations is **twenty-four thousand dollars (\$24,000)**. 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 2017 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 20,000 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 approximately 8,155 with a median household income (MHI) of \$56,627, which is 57% of the statewide MHI, according to the 2024 American Community Survey 5-Year Estimates.
13. The Discharger submitted a Compliance Project proposal to eliminate future effluent limitation violations. Additional information and requirements regarding the Compliance Project is contained in Attachment B, attached hereto and incorporated by reference.
14. Board staff find 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 total coliform. 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 **twenty-four thousand dollars (\$24,000)** in MMPs against the Discharger. The entire **twenty-four thousand dollars (\$24,000)** 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 incorporate the foregoing Recitals and 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 **twenty-four thousand dollars (\$24,000)** to the Central Valley Water Board to resolve the violation specifically alleged in Attachment A to this Order.

B) The entire **twenty-four thousand dollars (\$24,000)** penalty will be suspended through the completion of the Compliance Project described in Finding 13, in accordance with Water Code section 13385(k) incorporated herein by reference. This amount is also referred to as the Suspended Liability Amount.

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 is 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, Senior 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:

Brant Mesker, City Manager
City of Corning
25010 Gardiner Ferry Road
Corning, CA 96021

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 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 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 they are authorized to execute this Order on behalf of and to bind the entity on whose behalf the Order is executed.
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.
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. Further, this Stipulated Order may be executed by facsimile or electronic signature, and any such facsimile or electronic signature by any Party hereto shall be deemed to be an original signature and shall be binding on such Party to the same extent as if such facsimile or electronic signature were an original signature.

Settlement Agreement & Stipulation - 11 -
Administrative Civil Liability Order
R5-2022-0022
City of Corning
Wastewater Treatment Plant
Tehama County

22 June 2026

IT IS SO STIPULATED.

**California Regional Water Quality Control Board Prosecution Team
Central Valley Region**

By: **Clint E. Snyder, AEO**
Clint E. Snyder, P.G.
Assistant Executive Officer

Digitally signed by Clint E.
Snyder, AEO
Date: 2026.06.17 09:57:19
07:00'
Water Board

6/17/2026

Date

City of Corning

By: 
Brant Mesker
City Manager

7/28/26
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

Date

Enclosures: Attachment A: Record of Violations
Attachment B: Compliance Project Description

R5-2026-0530 - ATTACHMENT A
RECORD OF VIOLATIONS FOR ASSESSING MANDATORY MINIMUM PENALTIES

City of Corning
Wastewater Treatment Plant

RECORD OF VIOLATIONS (March 2024 – June 2024) MANDATORY PENALTIES
(Data reported under Monitoring and Reporting Program R5-2022-0022)

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	Violation Date	Parameter	Units	Limit	Measured	Period	Violation Type	MMP Type	CIWQS ID
1	3/13/2024	Total Coliform	MPN/100mL	23	49	7-Day Median	OEV	NCHRON	1126410
2	3/20/204	Total Coliform	MPN/100mL	23	49	7-Day Median	OEV	NCHRON	1126409
3	3/27/2024	Total Coliform	MPN/100mL	23	240	7-Day Median	OEV	NCHRON	1126408
4	4/3/2024	Total Coliform	MPN/100mL	23	240	7-Day Median	OEV	CHRON	1128001
5	4/11/2024	Total Coliform	MPN/100mL	23	155	7-Day Median	OEV	CHRON	1128002

R5-2026-0530 - ATTACHMENT A
RECORD OF VIOLATIONS FOR ASSESSING MANDATORY MINIMUM PENALTIES

Item	Violation Date	Parameter	Units	Limit	Measured	Period	Violation Type	MMP Type	CIWQS ID
6	4/17/2024	Total Coliform	MPN/100mL	23	80	7-Day Median	OEV	CHRON	1127998
7	4/23/2024	Total Coliform	MPN/100mL	23	42	7-Day Median	OEV	CHRON	1127999
8	4/30/2024	Total Coliform	MPN/100mL	23	49	7-Day Median	OEV	CHRON	1128000
9	5/7/2024	Total Coliform	MPN/100mL	23	130	7-Day Median	OEV	CHRON	1128972
10	5/14/2024	Total Coliform	MPN/100mL	23	79	7-Day Median	OEV	CHRON	1128971
11	6/4/2024	Total Coliform	MPN/100mL	23	49	7-Day Median	OEV	CHRON	1129923

EXPEDITED PAYMENT AMOUNT VIOLATIONS SUMMARY:

VIOLATIONS AS OF: 6/4/2024

Group I Serious Violations: 0

Group II Serious Violations: 0

Non-Serious Violations Not Subject to MMPs: 3

Non-serious Violations Subject to MMPs: 8

Total Violations Subject to MMPs: 8

Mandatory Minimum Penalty Amount for Effluent Limit Violation(s)

8 Non-Serious Violation subject to MMP x \$3,000 per Violation = \$24,000

Total Expedited Mandatory Minimum Penalty = \$24,000

R5-2026-0530 - ATTACHMENT A
RECORD OF VIOLATIONS FOR ASSESSING MANDATORY MINIMUM PENALTIES

Table A - 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.

Compliance Project Description

Project Title: City of Corning WWTP Compliance Project

Geographic Area of Interest: City of Corning Wastewater Treatment Plant,
Tehama County

Name of Responsible Entity: City of Corning

Contact Information:

Mitch Ampí, Designated Operator in Charge
City of Corning WWTP
25010 Gardiner Ferry Road
Corning, CA 96021
(530) 824-5863
mitch.ampi@inframark.com

Compliance Project Description and Goals:

The Discharger proposes to upgrade the existing disinfection and dechlorination systems to address the recurring total coliform effluent limitation violations. The Facility was originally designed to use chlorine gas for disinfection and sulfur dioxide gas for dechlorination. In 2023, the Discharger's contract operator reported supply shortages and reliability concerns associated with sulfur dioxide, which created a risk of inadequate dechlorination and potential noncompliance during chemical supply disruptions. To resolve this issue, the Discharger selected sodium bisulfite as a more consistently available dechlorination agent and initiated installation of new tanks and a chemical feed system.

During the evaluation of the dechlorination system, the Discharger also identified reliability concerns associated with the single-pump chlorine gas system used for disinfection. To improve dosing reliability and reduce the potential for future total coliform violations, the Discharger proposed converting from chlorine gas to a sodium hypochlorite disinfection system. The proposed upgrade includes two chemical feed pumps to provide redundancy. These upgrades will also improve operational control and ensure continuous and stable chlorine dosing.

The Discharger states that installation of the sodium bisulfite feed system was completed on 15 August 2024, and the sodium hypochlorite tanks and feed system were completed and placed into service on 16 December 2024. These upgrades are expected to provide more reliable disinfection and dechlorination performance, reducing the likelihood of total coliform exceedances during both normal and high-flow operating conditions.

R5-2026-0530 - ATTACHMENT B

The Discharger reports that since the systems were placed into service, total coliform sample results have generally been non-detect, with only one elevated sample occurring during a high-flow event. As proposed, the upgrades are anticipated to improve compliance with effluent limitations by providing consistent and dependable chemical dosing, thereby reducing the risk of future violations.

Estimated Cost of Compliance Project Completion:

The project cost was \$133,644 which is more than the entire \$24,000 of MMPs associated with this Order.

Compliance Project Milestones and Completion Dates:

While in communication with and with concurrence from the Central Valley Regional Board, Discharger moved forward with the upgrades in order to quickly address the violations while settlement negotiations progressed.

Evidence of Completion:

The entire \$24,000 is treated as a Suspended Administrative Liability as the discharger has submitted proof to the Regional Board that the money spent toward the Compliance Project was equal or greater than the Suspended Administrative Liability.