# CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD COLORADO RIVER BASIN REGION

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# **EXECUTIVE OFFICER'S REPORT**

California Regional Water Quality Control Board Colorado River Basin



December 2023

# TABLE OF CONTENTS

1.	LAND DISPOSAL – WASTE DISCHARGE REQUIREMENTS PROGRAM	2
2.	WATER QUALITY/NON-POINT SOURCE PROGRAMS	5
3.	UNDERGROUND STORAGE TANK AND SITE CLEANUP PROGRAM	5
4.	NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM PROGRAM 1	2

The Executive Officer (EO) of the California Regional Water Quality Control Board, Colorado River Basin Region (Regional Water Board) hereby provides the following report on recent staff activities for September and October 2023 in the region:

#### 1. LAND DISPOSAL – WASTE DISCHARGE REQUIREMENTS PROGRAM

**New River Sampling:** During the months of September and October, the Land Disposal Unit coordinated the New River Sampling Program by preparing sample bottles, coordinating lab contracts, and assisting in record keeping. Regional Water Board staff of the Land Disposal Unit collected water quality samples at the New River (International Boundary) in September while the Water Quality Standards Unit collected them in October. Imperial County [*Julya Mestas*].

**Permitted Facility Inspections:** During the months of September and October, the Land Disposal Unit conducted Complaint and Oversight inspections of Facilities regulated by Waste Discharge Requirements. The following Facilities were inspected:

Facility	Inspection Date	Board Order	County	Inspector
Allied Imperial Landfill	09/26/2023	R7-2014-0013	Imperial	Zakary Owens, Adrian Lopez
Sugar Beet Processing Facility	09/26/2023	R7-2023-0001	Imperial	Adriana Godinez
Best Western Joshua Tree Hotel & Suites	10/4/2023	R7-2007-0025	San Bernardino	Adriana Godinez
Drake Development Wastewater Treatment Plant	10/4/2023	R7-2007-0009	San Bernardino	Adriana Godinez
GSA Calexico East Border Crossing Station Wastewater Treatment Plant	10/4/2023	R7-2013-0031	Imperial	Adriana Godinez
Viridos Evaporation Pond Renovation Project	10/11/2023	R7-2015-0012	Imperial	Adriana Godinez
Sundance RV Resort LLC, Onsite Wastewater Treatment Plant	10/25/2023	97-500	San Bernardino	Adriana Godinez
McCabe Municipal Wastewater Treatment Plant	10/30/2023	R7-2015-0050	Imperial	Adriana Godinez

	Inspection Date	Board Order	County	Inspector
Twentynine Palms Marine Corps Air Ground Combat Center Water Treatment Plant		R7-2021-0033	San Bernardino	Julya Mestas

**Notices of Violation:** Two Notices of Violation were issued to dischargers for violations of Waste Discharge Requirements and the California Water Code in the months of September and October.

- On September 20, 2023, a Notice of Violation was issued to Drakon Power Group, LLC for failing to submit monitoring reports from July 15, 2021, to July 16, 2023, as required by Waste Discharge Requirements in Order No. R7-2010-0008. The Discharger is required to immediately submit all overdue reports. Imperial County [Zakary Owens]
- On October 2, 2023, a Notice of Violation was issued to Yucca Valley Senior Housing for a total of 32 violations of its Board Order, R7-2013-0058, that regulates the Facility's Onsite Wastewater Treatment System. The violations include exceedances of the Total Nitrogen and Total Suspended Solids effluent limitations in discharges during the 2021-2023 period, failing to submit complete reports, and failing to submit reports in a timely manner. The Discharger is required to immediately come into full compliance of the Order. San Bernardino County [Adriana Godinez]

**Approvals and Notifications:** Seven Approval/Notifications were issued to dischargers in the months of September and October:

- On September 7, 2023, the Regional Water Board issued a comment letter to Spreckels Sugar Company, Inc. in response to a Groundwater Investigation Workplan (Workplan) that was submitted on April 10, 2023. The Discharger is required to resubmit the Workplan with a more detailed schedule of the activities. Imperial County [*Adriana Godinez*].
- On September 11, 2023, the Regional Water Board issued a comment letter to Mission Springs Water District in response to a Nitrogen Control Strategy Technical Report (Report) that was submitted on April 10, 2023. The Report was approved for implementation and the Discharger is required to submit an updated schedule of implementation within 30 days. Riverside County [Adriana Godinez].
- On September 11, 2023, the Regional Water Board issued a Notice of Applicability to DePierro Development Corporation to enroll Top Dog Car Wash Express into the General Waste Discharge Requirements for Onsite Subsurface Wastewater Disposal Systems for Mobile Homes and other similar facilities, 97-500(186). San Bernardino County [Adriana Godinez].

- On September 20, 2023, the Regional Water Board issued a Notice of Applicability to DePierro Development Corporation to enroll Top Dog Car Wash Express into the General Waste Discharge Requirements for On-Site Subsurface Wastewater Disposal Systems For Fuel Service Stations, Auto Garages, Vehicle Maintenance/Wrecking Yards, Machine Shops, Bus Washes And Car Washes, 93-600(064). San Bernardino County [*Julya Mestas*].
- On September 26, 2023, the Regional Water Board issued a comment letter to Mission Springs Water District in response to a Total Dissolved Solids Impact Report that was submitted on April 12, 2023. Riverside County [Adriana Godinez].
- On September 26, 2023, the Regional Water Board issued a comment letter to Spreckels Sugar Company, Inc. in response to an Interim Precipitated Calcium Carbonate Waste Pile Management Plan that was submitted on July 7, 2023. The workplan was approved for implementation and the discharger is required to provide updates and notification upon completion of the proposed data collection activities. Imperial County [*Adriana Godinez*].
- On October 31, 2023, The San Bernardino County Solid Waste Management Division was given notice of a 30-day comment period on the Tentative Site-Specific Monitoring and Reporting Program for the Lucerne Valley Waste Management Facility, before the Facility is enrolled into General Order R7-2022-0033 for Closed Landfills. San Bernardino County [*Zakary Owens*]

**Notice of Terminations:** Four Notifications were issued to dischargers:

- On September 12, 2023, Stargreen Enterprises, LLC, was issued a Notice of Termination from State Water Resources Control Board Order No. WQ 2019-0001-DWQ (Board Order). The discharger submitted a request for termination and a site closure report on August 15, 2023, after ceasing cannabis activities at the site. Riverside County [Cannabis Unit]
- On September 12, 2023, CCC Project Holding 2, LLC, was issued a Notice of Termination for the Facility at 18776 Blue Dream Crossing, Desert Hot Springs, from State Water Resources Control Board Order No. WQ 2019-0001-DWQ (Board Order). The discharger submitted a request for termination and a site closure report on August 18, 2023, stating that cannabis activities never began at the site. Riverside County [Cannabis Unit]
- On September 12, 2023, CCC Project Holding 2, LLC, was issued a Notice of Termination for the Facility at 18437 Skywalker Court, Deseret Hot Springs, from State Water Resources Control Board Order No. WQ 2019-0001-DWQ (Board Order). The discharger submitted a request for termination and a site closure report on August 27, 2023, stating that cannabis activities never began at the site. Riverside County [*Cannabis Unit*]
- On September 13, 2023, Hi-Desert Water District was issued a Notice of

Termination from the State Water Resources Control Board General Waste Discharge Requirements for Discharges to Land with a Low Threat to Water Quality, 2003-0003-DWQ(39) (Board Order). The discharger submitted a request for termination dated November 17, 2020, after completing clean water testing of their new Wastewater Reclamation Plant. The termination is effective as of November 17, 2020. San Bernardino County [*Adriana Godinez*]

## 2. WATER QUALITY/NON-POINT SOURCE PROGRAMS

#### Colorado River Basin Salinity Forum Work Group

The Colorado River Basin Salinity Forum Work Group met September 26-27, 2023, in person in Salt Lake City, UT and virtually on Zoom. The group discussed the 2023 Triennial Review which received no comments. Final edits were made to the draft 2023 Triennial Review in preparation for Forum adoption in October. Federal agencies reported on updates about funding and studies. [*Emma McCorkle, SES*]

#### Tribal EPA and EPA Region 9 Conference

The Viejas Band of Kumeyaay Indians hosted the Tribal EPA and United States Environmental Protection Agency (USEPA) Region 9 Conference in Alpine, California on October 24 -26, 2023. This was the 31<sup>st</sup> annual conference to bring together tribes and representatives from USEPA Region 9. Water Board staff from every region, division, and office were in attendance to engage with the tribes. Sessions were presented by the tribes and USEPA on topics such as traditional ecological knowledge, data sovereignty, and funding. Staff attended sessions relevant to the region and the region's tribes such as the Tribal Beneficial Uses session put on by Water Boards representatives from Regions 5 and 9. Staff also met with tribal representatives from area tribes. Staff assisted with outreach at the official Water Boards booth. [*Emma McCorkle, SES*]

#### 3. UNDERGROUND STORAGE TANK AND SITE CLEANUP PROGRAM

Regional Water Board staff continues to work with staff from the Department of Defense (DOD) to expedite ongoing activities at cleanup sites located at military facilities within the Colorado River Basin Region. The underground storage tank (UST) and site cleanup program (SCP) staff issued correspondence reviewing technical reports, requesting site access, providing direction for site assessment, and approving remedial action plans for sites currently in the assessment and cleanup process. The following table lists the correspondence regarding DOD, UST and SCP projects issued in September and October 2023.

Date	Subject	Site	Staff
	Request For Submittal of A Feasibility Study	Above Ground Storage Tanks (ASTs), SoCo Bulk Plant, 350 East Main Street, El Centro, Imperial County,	Phan Le, Water Resource Control Engineer

Date	Subject	Site	Staff
		GeoTracker Global ID No. T10000012311	
September 6, 2023	Conditional Approval of Revised Work Plan for Additional Site Assessment Former Underground Storage Tanks	Imperial Irrigation District Headquarters, 333 E. Barioni Boulevard, Imperial, CA, Imperial County; Global ID No.SL0602597886	Theresa Illare, Environmental Scientist
September 14, 2023	Review of Response to Comments Table On The Draft Fall 2022 Semiannual Long-Term Monitoring, Landfill Inspection, And Maintenance Report	Installation Restoration Sites 1 and 2, Naval Air Facility El Centro, California GeoTracker ID No: DOD100312800 and DOD100317400	Jeff Fitzsimmons, Engineering Geologist
September 15, 2023	Nonconcurrence of Final Site Inspection Report, Basewide Investigation of Per- And Polyfluoroalkyl Substances (PFAS) And	Twentynine Palms Marine Corps Air Ground Combat Center, Twentynine Palms, San Bernardino County, GeoTracker Global ID No: DOD100399200	Jessie Bagby, Engineering Geologist
September 18, 2023	Review of Revised Additional Assessment Workplan Requirement Pursuant To Health and	Former E-Z Serve Station, 805 Imperial Ave., El Centro, Imperial County, CRWQCB File No. 7T2 243 051, GeoTracker File T0602500101	Thomas Browne, Water Resource Control Engineer
September 19, 2023	•	Former Flying Inn Motel Currently Magnuson Hotel Blythe, 9232 East Hobsonway (Also Known As) 1781 East Hobsonway, Blythe, Riverside County, GeoTracker Global ID No. T0606500754	Phan Le, Water Resource Control Engineer
September 19, 2023		Former USA Service Station No. 295, 1036 Imperial Ave., Calexico, Imperial County, CRWQCB File No. 7T2 231 019, GeoTracker File	Thomas Browne, Water Resource Control Engineer

Date	Subject	Site	Staff
		T0602558699, Cleanup Fund #17629	
September 19, 2023	Concurrence of Final Removal Action Completion Report, Non-Time Critical Removal Action, Munitions Response Program Site 2	Naval Air Facility El Centro, El Centro, California, GeoTracker ID T10000011417	Jessie Bagby, Engineering Geologist
September 20, 2023		Former Flying Inn Motel Currently Magnuson Hotel Blythe, 9232 East Hobsonway (Also Known As) 1781 East Hobsonway, Blythe, Riverside County, GeoTracker Global ID No. T0606500754	Phan Le, Water Resource Control Engineer
September 20, 2023	Nonconcurrence of Response to Comments Table, Draft Final Record of Decision, Munitions Response Program Site UXO 01	Marine Corps Air Ground Combat Center Twentynine Palms, California GeoTracker Global ID No. T10000004231	Jeff Fitzsimmons, Engineering Geologist
September 21, 2023	Conditional Approval of Plume Delineation, Well Installation, and Conceptual Site Model Report.	USA Gasoline Station #294, 525 East Fifth Street, Holtville, Imperial County; Global ID No. T0602599293	Theresa Illare, Environmental Scientist
September 26, 2023	Nonconcurrence of Response to Comments Table, Underground Storage Tank 10	Twentynine Palms Marine Corps Air Ground Combat Center, Twentynine Palms, San Bernardino County, GeoTracker Global ID No: T060719383	Jessie Bagby, Engineering Geologist
September 26, 2023	Approval of Remedial Action Plan- Oxygen Sparging Pilot Test	USA Gasoline Station #294, 525 East Fifth Street, Holtville, Imperial County; Global ID No. T0602599293	Theresa Illare, Environmental Scientist

Date	Subject	Site	Staff
September 26, 2023	Conditional Approval of Addendum To Revised Workplan For Additional Remediation	Former USA Service Station No. 270, 824 Imperial Ave., Calexico, Imperial County, CRWQCB File No. 7T2 243 032, GeoTracker File T0602585867, Cleanup Fund #17625	Thomas Browne, Water Resource Control Engineer
October 2, 2023	Concurrence With The Final Site Management Plan	Marine Corps Air Ground Combat Center, Twentynine Palms, San Bernardino County GeoTracker Global ID No. DOD100399200	Jeff Fitzsimmons, Engineering Geologist
October 3, 2023	Corrected Version Concurrence With The Final Site Management Plan	Marine Corps Air Ground Combat Center, Twentynine Palms, San Bernardino County GeoTracker Global ID No. DOD100399200	Jeff Fitzsimmons, Engineering Geologist
October 3, 2023	Approval of Extension Request For Submittal Of A Feasibility Study	Above Ground Storage Tanks (ASTs), SoCo Bulk Plant, 350 East Main Street, El Centro, Imperial County, GeoTracker Global ID No. T10000012311	Phan Le, Water Resource Control Engineer
October 4, 2023	Concurrence With The Final Land Use Control Implementation Plan, Installation Restoration Site 14	Marine Corps Air Ground Combat Center, Twentynine Palms, San Bernardino County GeoTracker Global ID No. DOD100399200	Jeff Fitzsimmons, Engineering Geologist
October 4, 2023	Concurrence With The Revised Final Remedial Action Completion Report, Remedial Action at Installation Restoration Site 18	Naval Air Facility El Centro, El Centro, California, GeoTracker ID No: T10000002075	Jessie Bagby, Engineering Geologist

Date	Subject	Site	Staff
October 4, 2023	Draft Final Site Inspection Report And The	Naval Air Facility El Centro, El Centro, California, GeoTracker ID No: DOD100308000	Jessie Bagby, Engineering Geologist
October 5, 2023	Review of Revised Interim Remedial Action Plan and Response to Comments Table	Munguia Lot, 1002 East H Street, Brawley, Imperial County, GeoTracker Global ID No. T0602564848	Theresa Illare, Environmental Scientist
October 5, 2023	Review of Excavation Oversight and Soil Vapor Sampling Report	RD Brown, 307 and 321 North Imperial Avenue, Imperial, Imperial County; GeoTracker Global ID No. T10000005261	Phan Le, Water Resource Control Engineer
October 6, 2023	Review Of Semi-Annual Status Report, First Half 2023	Former Chevron 92693, 400 Imperial Ave., Calexico, Imperial County, CRWQCB File No. 7T2 231 002, GeoTracker ID T0602500034, Cleanup Fund No. 4630	Thomas Browne, Water Resource Control Engineer
October 9, 2023	Review of Second Quarter 2023 Groundwater Monitoring and Closure Request Report	RD Brown, 307 and 321 North Imperial Avenue, Imperial, Imperial County; GeoTracker Global ID No. T10000005261	Phan Le, Water Resource Control Engineer
October 11, 2023	Amendment To Cleanup and Abatement Order (CAO) No. R7-2011- 0006, And Review of Summary of Site Data	Former Unocal/Geothermal Energy and Mineral Corporation (GEMCOR) Facility, 950 West Lindsey Road, Calipatria, Imperial County; GeoTracker Global ID No. T10000006199	Phan Le, Water Resource Control Engineer
October 12, 2023	Concurrence With The Draft Final Proposed Plan and Response to Comments Table, Munitions Response Program Site 4	Naval Air Facility El Centro, El Centro, California, GeoTracker ID T10000011419	Jessie Bagby, Engineering Geologist

Date	Subject	Site	Staff
October 12, 2023	Review of Response to Comments Table and Supplemental Information	Installation Restoration Sites 1 and 2, Naval Air Facility El Centro, El Centro, California, GeoTracker ID No: DOD100312800 and DOD100317400	Jessie Bagby, Engineering Geologist
October 13, 2023	New Regional Water Board Project Manager	Marine Corps Air Ground Combat Center, Twentynine Palms, San Bernardino County GeoTracker Global ID No. DOD100399200	Jeff Fitzsimmons, Engineering Geologist
October 24, 2023	Conceptual Site Model Report Addendum And Request For No Further Action	Coca-Cola Bottling Company, 126 South Third Street, El Centro, California, Imperial County; GeoTracker Global ID No. T10000019745	Angela Garcia, Senior Engineering Geologist
October 25, 2023	Review of Revised Conceptual Site Model	Former SoCo #60, 1690 South 4 <sup>th</sup> Street, El Centro, Imperial County, CRWQCB File No. 7T2 243 072, GeoTracker File T10000006437, Cleanup Fund No. 20281	Thomas Browne, Water Resource Control Engineer
October 25, 2023	Review of the Draft Work Plan for Data Gap Investigation	Installation Restoration Site 7, Naval Air Facility El Centro, El Centro, California, GeoTracker ID NO: DOD100319000	Jessie Bagby, Engineering Geologist
October 25, 2023	Review of Response To Comments Table	Installation Restoration Site 2 Patrol Road Landfill, Naval Air Facility El Centro GeoTracker ID NO: DOD100317400	Jessie Bagby, Engineering Geologist
October 25, 2023	Concurrence With the Response To Comments Table	Installation Restoration Sites 1 and 2, Naval Air Facility El Centro, El Centro, California, GeoTracker ID NO: DOD100312800 and DOD100317400	Jessie Bagby, Engineering Geologist

Date	Subject	Site	Staff
October 25, 2023	New Regional Water Board Project Manager	Thermal Airport 56850 Tyler Street Thermal, CA 92274 GeoTracker Global ID No. SL20702103	Jeff Fitzsimmons, Engineering Geologist
October 25, 2023	New Regional Water Board Project Manager	Twin Pines Ranch 49500 Twin Pines Ranch Road, Banning, CA GeoTracker Global ID No. T0606500736	Jeff Fitzsimmons, Engineering Geologist
October 25, 2023	New Regional Water Board Project Manager	Marine Corps Air Ground Combat Center, Twentynine Palms, California GeoTracker Global ID No. DOD100399200	Jeff Fitzsimmons, Engineering Geologist
October 26, 2023	Review of Second Quarter 2023 Groundwater Monitoring and Closure Request Report	RD Brown, 307 And 321 North Imperial Avenue, Imperial, Imperial County; GeoTracker Global ID No. T10000005261	Phan Le, Water Resource Control Engineer
October 26, 2023	Approval of Supplemental Subsurface and Vapor Intrusion Investigation Work Plan	Riverland RV Resort, Aboveground Storage Tank (AST) Facility, 3401 Parker Dam Road, Earp, San Bernardino County; GeoTracker Global ID No. T10000002077, BLM No. CAAZCA26035	Phan Le, Water Resource Control Engineer
October 30, 2023	Review of 2022 Annual Groundwater Monitoring Report for Twentynine Palms Water District's Salt and Nutrient Management Plan	Twentynine Palms Water District, 72401 Hatch Road, Twentynine Palms, California 92277-2935	Jeff Fitzsimmons, Engineering Geologist
October 31, 2023	Right of Entry Form/Site Access Agreement For Work Conducted Under Emergency Abandoned, Recalcitrant (EAR) Account E0226	Former USA Gas, 1979 W. Ramsey Street, Banning, CA, Riverside County Case No. 20052133, GeoTracker Global ID No. T0606537906	Phan Le, Water Resource Control Engineer

Date	Subject	Site	Staff
October 31, 2023	Response to the Regional Water Board Commnets on the Twentynine Palms Water District's 2021 Salt and Nutrient Management Plan Groundwater Monitoring Report	District,72401 Hatch Road, Twentynine Palms, California 92277-2935	Jeff Fitzsimmons, Engineering Geologist
October 31, 2023	Approval of Request for Extension Pursuant to	Rite Spot Market, 1201 Parker Dam Road, Earp, San Bernardino County; Global ID No. T0607100969 (APN 0661-131-04-0000)	Theresa Illare, Environmental Scientist
October 31, 2023	Assessment of Petroleum Vapor Intrusion to Indoor	Highway 111, Coachella, Riverside County, Global ID	Theresa Illare, Environmental Scientist

## 4. NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM PROGRAM

# Permitting Emergency Projects in Response to Recent Storm Events, Regionwide

On August 21 and September 1, 2023, storm events in the Colorado River Basin Region caused flooding and damage to critical infrastructure. Since then, the Regional Water Board has received 23 applications (Notices of Intent) for enrollment under Water Quality Order (WQO) Order No. 2018-0029-EXEC and WQO Order No. 2023-0058-DWQ, statewide general orders permitting emergency repair and protection activities. Regional Water Board staff are processing the applications and have enrolled 12 projects under the general orders. *[Logan Raub, SES]* 

#### Fact Sheet Reporting the Surface Water Program's Planned Permitting Activities for Fiscal Year 2023-2024, Regionwide

Regional Water Board staff developed a programmatic fact sheet for the NPDES program as part of the Regional Water Board's outreach activities to provide equitable, culturally relevant community outreach to potentially impacted communities. This outreach aligns with the Regional Water Board's Strategic Objective to engage with underserved and under-represented communities. On

October 27, 2023, Regional Water Board staff sent copies of the fact sheet to 116 Tribal Contacts, Academia, Community Groups, Local Governments, Non-Governmental Organizations, Advocacy Groups, and Technical Assistance Providers in the Region. *[Logan Raub, SES; Kai Dunn, Supervising WRCE]* 

## Imperial Irrigation District Supplemental Environmental Project (SEP)

On September 14, 2021, Stipulated Order No. R7-2021-0006 was adopted for a total liability of \$549,000 issued to resolve violations at the Grass Carp Hatchery and El Centro Generating Station facilities. The entire liability was suspended pending the discharger's funding and completion of a third party-performed supplemental environmental project (SEP) by the Imperial County Public Health Department, Division of Environmental Health (DEH): Point of Entry (POE) Pilot Project – Phase II. Under the POE Pilot Project – Phase II, at least 25 additional POE systems were to be installed and maintained for at least 2 years after the installation date.

As of their most recent progress report (3<sup>rd</sup> Quarter 2023), a total of 25 POEs have been installed to date. DEH collected source samples from two households to test the full suite of chemicals. All chemicals detected were below their respective maximum contaminant levels (MCLs) as established by the California Safe Drinking Water Act.

DEH continues to work with the Imperial County Public Health Department Multimedia Team in finalizing the POE demonstration video as required in the SEP. The video is being edited and is expected to be completed during the 4<sup>th</sup> Quarter 2023 reporting period. This will provide maximum accessibility for households with a POE. All households with a POE installed will be notified of the availability and location of the video. [*Kai Dunn, Supervising WRCE*]

# 401 Water Quality Certifications (Dredge or Fill Discharge)

The following table shows the certifications that the Colorado River Basin Water Board issued in October 2023. The certifications listed were in addition to the waste discharge requirements adopted by the Regional Water Board. *[Logan Raub, Environmental Scientist, Fatima Alrahem, WRCE]* 

Issuance Date	Applicant	Project	WDID#
10/03/2023	Coachella Valley Water District	Thousand Palms Flood Control Project	7A333252001
10/30/2023	Southern California Edison	TD1817371, TD1817372, and TD1882154 Yucca Valley Pioneertown Pole Replacement Project	7A363047001

Table 1:	Mandatory	Minimum	Penalty	v Status
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Number	Facility	Violation Description	Assessed Penalty	Settlement Offer Date	Waiver Received Date	Public Notice Issuance Date	Comment Due Date	EO Execution Date	Number of MMPs
1	Seeley CWD	Bacteria indicator & Free Cyanide	\$27,000 *\$39,000	8/11/2021 *9/2/21	9/8/21 *9/23/21		*Discharger agreed to settlement discussion		9 *13
2	Niland SD	Bacteria indicator, BOD, Chlorine Residual	\$45,000	7/29/2022	8/29/22		*Discharger agreed to settlement discussion		15
	TOTAL:		\$72,000 *\$39,000						24 *13

\*Revised

# Unaddressed Violations Subject to Mandatory Minimum Penalties (October 2023)

	<u>J</u>
No. of Facilities	No. of Violations
5	42

[Kai Dunn, Supervising WRCE]