

Mandatory Penalty Administrative Civil Liability

Eureka City

Eureka City Elk River WWTP

WDID No. 1B82151OHUM

NPDES No. CA0024449

EXHIBIT "A"

Effluent Limitations Violations Requiring Mandatory Minimum Penalties

#	Violation Number	Violation Date	Constituent	Pollutant Group	Limitation Period	Limit	Result/Average	Units	Exempted from MMP?	Exempt Reason	% Over Limit	Date 180 Days Prior	Serious or Chronic Violation?	No. of Violations within 180 days	Mandatory Fine?	Water Code	Penalty
1	1121431	08/10/2023	Ammonia, Total (as N)	Group 1	Daily Maximum	10	23	mg/L	Y	a	130%	02/11/2023	S	Ct. 1	N		\$ 0
2	1121429	08/31/2023	Ammonia, Total (as N)	Group 1	Monthly Average	4.1	15	mg/L	Y	a	266%	03/04/2023	S	Ct. 2	N		\$ 0
3	1121430	09/06/2023	Ammonia, Total (as N)	Group 1	Daily Maximum	10	20	mg/L	Y	a	100%	03/10/2023	S	Ct. 3	N		\$ 0
4	1121433	09/18/2023	Fecal Coliform	Other	Single Sample Maximum	43	49	MPN/100	Y	a	N/A	03/22/2023	C	> Ct. 3	N		\$ 0
5	1121432	09/30/2023	Ammonia, Total (as N)	Group 1	Monthly Average	4.1	13	mg/L	Y	a	217%	04/03/2023	S	> Ct. 3	N		\$ 0
6	1123435	10/10/2023	Cyanide, Total (as CN)	Group 2	Daily Maximum	1	1.5	ug/L	Y	a	50%	04/13/2023	S	> Ct. 3	N		\$ 0
7	1123434	10/31/2023	Cyanide, Total (as CN)	Group 2	Monthly Average	0.5	1.5	ug/L	Y	a	200%	05/04/2023	S	> Ct. 3	N		\$ 0
8	1123433	10/31/2023	Ammonia, Total (as N)	Group 1	Monthly Average	4.1	4.2	mg/L	Y	a	2%	05/04/2023	C	> Ct. 3	N		\$ 0
9	1123437	12/19/2023	Fecal Coliform	Other	Single Sample Maximum	43	130	MPN/100	Y	a	N/A	06/22/2023	C	> Ct. 3	N		\$ 0
10	1126645	02/06/2024	Fecal Coliform	Other	Daily Maximum	43	350	MPN/100	N		N/A	08/10/2023	C	> Ct. 3	Y	13385(i)	\$ 3,000
11	1126644	03/03/2024	Fecal Coliform	Other	Daily Maximum	43	110	MPN/100	N		N/A	09/05/2023	C	> Ct. 3	Y	13385(i)	\$ 3,000
12	1139615	12/23/2024	Fecal Coliform	Other	Daily Maximum	43	46	MPN/100	N		N/A	06/26/2024	N/A	Ct. 1	N		\$ 0
13	1139616	12/29/2024	Fecal Coliform	Other	Daily Maximum	43	1600	MPN/100	N		N/A	07/02/2024	N/A	Ct. 2	N		\$ 0
14	1139614	12/30/2024	Fecal Coliform	Other	Daily Maximum	43	130	MPN/100	N		N/A	07/03/2024	N/A	Ct. 3	N		\$ 0
15	1142476	01/06/2025	Fecal Coliform	Other	Daily Maximum	43	49	MPN/100	N		N/A	07/10/2024	C	> Ct. 3	Y	13385(i)	\$ 3,000
16	1142477	02/03/2025	Fecal Coliform	Other	Daily Maximum	43	1600	MPN/100	N		N/A	08/07/2024	C	> Ct. 3	Y	13385(i)	\$ 3,000
17	1142478	03/17/2025	Fecal Coliform	Other	Daily Maximum	43	79	MPN/100	N		N/A	09/18/2024	C	> Ct. 3	Y	13385(i)	\$ 3,000

Total Penalty: \$ 15,000

Legend of Table

a. Violation is not eligible for MMP because it was already included in a previous Enforcement Action. Included in this list to show rolling 180-day count.

Ct. Count – The number that follows represents the number of exceedances in the past 180 days. A count > than Ct. 3 means that a penalty under Water Code Section 13385 (i) applies.

1 - Violation occurs on sample date or last date of averaging period.

2 - For Group I pollutants, a violation is serious when the limit is exceeded by 40% or more

- For Group II pollutants, a violation is serious when the limit is exceeded by 20% or more

3 - When a serious violation occurs on the same day as a chronic, the serious violation is only assessed an MMP once and is counted last for the day when determining the number of chronic violations to be assessed a penalty.

Violation Period Between February 6, 2024 and March 17, 2025

Group I Violations Assessed MMP:	0
Group II Violations Assessed MMP:	0
Other Effluent Violations Assessed MMP:	5
Violations Exempt from MMP:	0
Total Violations Assessed MMP:	5

Mandatory Minimum Penalty = (0 Serious Violations + 5 Non-Serious Violations) x \$3,000 = \$15,000