



California Environmental Protection Agency



CALIFORNIA

Water Boards

STATE WATER RESOURCES CONTROL BOARD
REGIONAL WATER QUALITY CONTROL BOARDS

ENFORCEMENT REPORT

[Per California Water Code Chapter 5.5, Section 13385(o)]

February 23, 2005

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**State Water Boards
Enforcement Report**
[Per California Water Code Chapter 5.5, Section 13385(o)]

This State Water Boards report provides the information directed by Chapter 5.5 Section 13385(o) of the California Water Code, responding to the following provision:

13385 Civil Liability

(o): The state board shall continuously report and update information on its Web site, but at a minimum, annually on or before January 1, regarding its enforcement activities. The information shall include all of the following:

(A) A compilation of the number of violations of waste discharge requirements in the previous calendar year, including stormwater enforcement violations.

(B) A record of the formal and informal compliance and enforcement actions taken for each violation, including stormwater enforcement actions

(C) An analysis of the effectiveness of current enforcement policies, including mandatory minimum penalties.

As directed by this statute, the report is available at the Water Board's website at <http://www.waterboards.ca.gov> .

Executive Summary

This report summarizes information regarding violations of waste discharge requirements and enforcement actions taken by the Regional Water Boards in response to those violations. The report addresses only discharges to surface water because it has been prepared pursuant to Chapter 5.5 of the California Water Code. Chapter 5.5 implements provisions of the Federal Water Pollution Control Act and establishes a regulatory program for discharges to surface water only. This report also contains commentary on performance and follow-up actions.

The Water Boards use the System for Water Information Management (SWIM) database to track violations and the resulting enforcement actions. The SWIM database contains information on violations and enforcement actions that have occurred since July 1, 1999.

The major findings of this report are:

- (1) The Water Boards have assessed nearly \$50 million in penalties over the last four fiscal years.
- (2) The Water Boards have issued enforcement actions to 16,814 violations over the last four fiscal years, 7,860 of these violations received a formal enforcement action.
- (3) The number of permits per staff has increased over the past four fiscal years from 49 to 74, drawing resources away from dealing with violations and enforcement.
- (4) The total number of violations of waste discharge requirements at National Pollutant Discharge Elimination System (NPDES) wastewater facilities and the number of effluent violations has fluctuated over the past four years with no discernable patterns.
- (5) The percentage of violations with a completed enforcement action has declined during the past four years (Note some violations may not warrant enforcement).
- (6) A backlog of MMPs for reporting violations has developed as the Water Boards adjust to this new requirement effective January 1, 2004.
- (7) After a rise from 2000 to 2002, the total number of violations occurring in the NPDES stormwater program is declining.
- (8) Although improvements are occurring, data quality and completeness problems persist due to continued reliance on manual review of discharger self-monitoring reports and manual data entry.

These findings are based on input from Water Board enforcement coordinators and analysis of the data from the SWIM database as presented in this report.

The Water Boards are undertaking the following actions to address these findings:

- (a) Standardization for efficient processing of permits and MMPs; return saved resources to compliance work,
- (b) e-government to provide dischargers and state staff greater efficiencies and enable more state resources devoted to compliance,
- (c) Explore improved prioritization of enforcement efforts,
- (d) More effective semi-annual reviews of compliance progress,
- (e) A "Compliance Report Card" on the Internet.

Introduction

This report addresses violations of Waste Discharge Requirements for discharges to surface water. Discharges to surface water are issued a combined Waste Discharge Requirements/NPDES permit. The NPDES program is administered by California in accordance with the United States Environmental Protection Agency's approval, and is implemented through Chapter 5.5 of the California Water Code. NPDES Waste Discharge Requirements are usually issued by one of the nine Regional Water Boards. These nine Regional Water Boards and twelve regional offices lie within different watersheds and are as follows (see Appendix A for map and details):

- Region 1 – North Coast Water Board
- Region 2 – San Francisco Bay Water Board
- Region 3 – Central Coast Water Board
- Region 4 – Los Angeles Water Board
- Region 5 – Central Valley Water Board (With Offices in Redding [5R], Sacramento [5S] and Fresno [5F])
- Region 6 – Lahontan Water Board (With offices in South Lake Tahoe [6A] and Victorville [6B])
- Region 7 – Colorado River Basin Water Board
- Region 8 – Santa Ana Water Board
- Region 9 – San Diego Water Board

Four overarching considerations are pertinent to this report: the reporting period, federal facilities, stormwater facilities, and data quality.

Reporting Period

This report includes a compilation of violations that occurred during state fiscal year 2003-2004 (between July 1, 2003 and June 30, 2004) and the enforcement actions in response to those violations. Typically, it takes approximately six months to issue an enforcement action after the violation has occurred; it may take substantially longer for more complex cases, or where staff has been assigned to higher priorities. Therefore, this report considers violations up to June 30, 2004. Also, self-monitoring reports are typically due to the Water Boards 30 to 45 days after the end of the month for which the monitoring was done. This allows for laboratory analysis and transmittal of data. As a result, Water Board staff does not detect violations for several months after they occur. Staff must review the reports, identify the violations and manually enter the information into the data system. For this reason we are unable to provide a previous calendar year report by January 1, 2005 as specified by the statute directing this report. Unless specified otherwise, data for the report was extracted from the SWIM database on January 27, 2005.

Federal Facilities

SWIM database information about federal facilities has become inconsistent and problematic because Water Boards have found it difficult to prevail in enforcement against federal facilities. Federal facilities are shielded from most enforcement actions by sovereign immunity, so enforcement actions are often precluded. Motivation for data entry under these circumstances

has declined. For example, Regional Water Board 9 initially entered all identified violations at federal facilities into the database. The Water Board discontinued this comprehensive recordation of federal facility violations early in 2001 because of their inability to enforce. The SWIM database reflects this Water Board decision as it includes 1,799 violations that occurred at federal facilities in that Region during fiscal year 1999-2000, 691 violations in 2000-2001, 62 violations in 2001-2002, 93 violations in 2002-2003, and 86 in 2003-2004. We know from the Water Board action that this significant reduction in recorded violations does not represent improved compliance at federal facilities. But if the data is included in summary information about violations and related enforcement, it has a dramatic and misleading impact on the apparent trends in that Region, and for the entire state. For that reason, this report does not include violations and enforcement actions for federal facilities.

Stormwater Facilities

Two things have recently occurred with respect to reporting on stormwater enforcement: 1) previously separate wastewater and stormwater enforcement reports were consolidated by statute, commencing January 1, 2005, into this report, and 2) the stormwater program began using the SWIM data base for recording stormwater violations and enforcement actions. The result is dedicated wastewater and stormwater sections in this report, and a broader stormwater discussion than past stormwater enforcement reports.

Data quality

Data quality and completeness, although improved, continues to be a challenge. Spot checks indicate that data entry is inconsistent between Water Boards and has been delayed in some. The primary reasons for these difficulties are the manual review of monitoring reports and manual data entry. Measures are being developed that will automate this data entry. They will relieve staff of this added burden, and improve data quality/completeness. Implementation of these measures is scheduled to begin in the fall of 2005.

(A) A compilation of the number of violations of waste discharge requirements in the previous year.

Wastewater

During the reporting period, there were 2,186 active wastewater facilities regulated by NPDES waste discharge requirements in California. These facilities are divided into two categories:

- Major facilities – Facilities with an average daily discharge greater than 1 million gallons per day or those that pose a high degree of threat to water quality;
- Minor facilities – Facilities with an average daily flow less than 1 million gallons per day and have a lower threat to water quality.

The waste discharge requirements (hereinafter “NPDES permits” or “permits”) are issued as individual permits or as general permits. Dischargers who are eligible for coverage under a general permit must enroll and agree to comply with the conditions of the general permit.

A summary of active NPDES facilities by category and Water Board is shown in Table 1.

Table 1: NPDES Wastewater Facilities by Category and Regional Office

REGIONAL OFFICE	MAJOR FACILITIES	MINOR FACILITIES			Total
	INDIVIDUAL Permits	GENERAL Permit Enrollees	INDIVIDUAL Permits	Total Minor	
1	15	15	31	46	61
2	58	216	43	259	317
3	22	76	27	103	125
4	46	425	122	547	593
5F	6	21	39	60	66
5R	13	18	54	72	85
5S	39	56	68	124	163
6A	0	13	4	17	17
6B	1	4	7	11	12
7	11	39	16	55	66
8	19	430	31	461	480
9	37	111	26	137	174
Total	267	1,204	468	1,672	2,159

*Data compiled on January 27, 2005. Does not include federal facilities.

Table 2 lists the total number of violations of NPDES permits by Water Board office for each of the past five fiscal years. The table shows a decrease in the number of total violations over the first three years followed by an increase during the last two fiscal years. This increase in the number of violations is mostly explained by the increased diligence in recording reporting violations prompted by the late report MMP requirements commencing January 1, 2004.

Table 2: Number of Violations of NPDES Wastewater Permits, by Fiscal Year (July 1 to June 30) From 1999-2000 to 2003-2004

Violations of NPDES Waste Discharge Requirements					
Regional Office	1999 - 2000	2000 - 2001	2001 - 2002	2002 - 2003	2003 - 2004
1	652	616	463	350	549
2	530	512	369	307	183
3	329	325	396	265	241
4	1,485	1,886	1,454	2,090	2,820
5F	475	584	969	782	591
5R	333	114	97	84	45
5S	1,306	973	585	546	530
6A	7	11	12	19	10
6B	11	5	14	25	24
7	150	233	214	264	272
8	604	422	195	214	163
9	246	288	180	236	574
Total	6,128	5,969	4,948	5,182	6,002

* Data compiled on January 27, 2005.

A comparison of the number of violations by Water Board and the number of facilities regulated in that Water Board is provided in Table 3. A comparison of the average number of violations per facility assists in recognizing Water Boards or facilities that have above average and below average compliance rates.

Table 3: Number of Violations Per Wastewater Facility for Fiscal Year 2003-2004

Number of Facilities Compared to Number of NPDES Violations FY 2003-2004			
Regional Office	NPDES Facilities	Total Violations	Violations per facility
1	61	549	9.0
2	317	183	0.6
3	125	241	1.9
4	593	2,820	4.8
5F	66	591	9.0
5R	85	45	0.5
5S	163	530	3.3
6A	17	10	0.6
6B	12	24	2.0
7	66	272	4.1
8	480	163	0.3
9	174	574	3.3
Total	2,159	6,002	Average: 2.8

* Data compiled on January 27, 2005.

The data indicate an uneven distribution of the average number of violations per facility among the different Water Board offices. The reasons for this high variability include differences in facility-specific requirements, differences in Water Board office processes and priority assigned to report review and data entry, and differences in rates of compliance among dischargers. Variability due to report review and data entry should be eliminated with the automation of this process starting in the fall of 2005. Another project to standardize permits will reduce the difference in facility specific requirements over the next few years as permits are renewed.

A breakdown of the violation types and the number of those violations that are identified as priority violations is presented in Table 4. A more detailed description of each violation category is provided in Appendix B. Violations vary from not submitting monitoring reports on time to acute toxicity violations. The Water Boards identify priority violations based on criteria identified in the Water Quality Enforcement Policy (Resolution No. 2002-0040) (<http://www.waterboards.ca.gov/plnspols/docs/wqep.doc>). A priority violation represents a greater threat to water quality than other violations. Approximately thirty four percent of NPDES wastewater violations have been identified as priority violations.

Table 4: NPDES Wastewater Violations by Category for FY 2003-2004

Breakdown of the Number of NPDES Violations by Category for FY 2003-2004					
Description of Violation Category (See Appendix B)	Total Violations		Priority Violations		
	Number	%	Number	% of Total Priority	% of Total Violations
Failure to submit Reports or Report is Deficient	2,085	35%	626	31%	10%
Category 1 Pollutant	1,681	28%	823	40%	14%
Other Effluent Violation	1,069	18%	40	2%	1%
Category 2 Pollutant	527	9%	379	19%	6%
Violation of Non-Effluent Permit Condition	218	4%	28	1%	0%
Sanitary Sewer Overflow	124	2%	1	0%	0%
Failure to Pay Annual Fees	106	2%	105	5%	2%
Acute Toxicity	79	1%	3	0%	0%
Unregulated Discharge	59	1%	14	1%	0%
Chronic Toxicity	43	1%	4	0%	0%
Failure to Obtain Permit	7	0%	0	0%	0%
Compliance Schedule	3	0%	0	0%	0%
Failure to Notify Per Requirement	1	0%	0	0%	0%
Total	6,002		2,023		34%

*Data compiled on January 27, 2005.

Stormwater

At the time of report preparation, there are 24,010 active facilities/permittees regulated by NPDES stormwater permits in California. These facilities are divided into five categories:

- **Construction Stormwater Facilities** – Dischargers whose projects disturb 1 or more acres of soil or whose projects disturb less than 1acre but are part of a larger common plan of development that in total disturbs 1 or more acres, are required to obtain coverage under the General Permit for Discharges of Storm Water Associated with Construction Activity ([Construction General Permit, 99-08-DWQ](#)). Construction activity subject to this permit includes clearing, grading and disturbances to the ground such as stockpiling, or excavation, but does not include regular maintenance activities performed to restore the original line, grade or capacity of the facility.
- **Industrial Stormwater Facilities** – The Industrial Storm Water General Permit Order 97-03-DWQ ([General Industrial Permit](#)) is an NPDES permit that regulates discharges associated with 10 broad categories of industrial activities.
- **Linear Stormwater Facilities** –Underground/Overhead Projects disturbing at least 1 acre but less than 5 acres (including trenching and staging areas) are covered by the Statewide

General Permit for Storm Water Discharges Associated with Construction Activity from Small Linear Underground/Overhead Projects ([Small LUP General Permit](#))

- Municipal Stormwater Phase I Facilities – The Municipal Storm Water Permits regulate storm water discharges from municipal separate storm sewer systems (MS4s). Under [Phase I](#), which started in 1990, the Water Boards have issued NPDES MS4 permits to permittees serving populations greater than 100,000 people. Many of these permits are issued to a group of co-permittees encompassing an entire metropolitan area.
- Municipal Stormwater Phase II Facilities – Under [Phase II](#), the SWRCB adopted a General Permit for the Discharge of Storm Water from Small MS4s (WQ Order No. 2003-0005-DWQ) to provide permit coverage for smaller municipalities (10,000 to 100,000 people), including non-traditional Small MS4s which are governmental facilities such as military bases, public campuses, and prison and hospital complexes.

The stormwater permits are generally issued as individual permits to the Phase 1 MS4s and as general permits to the other categories. Dischargers who are eligible for coverage under a general permit must enroll and agree to comply with the conditions of the general permit.

A summary of active NPDES stormwater facilities by category and Water Board is shown in Table 5.

Table 5: NPDES Stormwater Facilities by Permit Type and Regional Office

REGIONAL OFFICE	Construction	Industrial	Linear	Municipal Phase I**	Municipal Phase II**	Total
1	300	352	0	7	0	659
2	1,732	1,266	13	75	15	3,101
3	728	337	3	3	0	1,071
4	2,256	2,355	5	100	0	4,716
5F	1,019	489	4	8	0	1,520
5R	323	168	2	2	2	497
5S	3,664	1,060	16	21	31	4,792
6A	228	70	0	3	0	301
6B	640	185	2	1	0	828
7	505	134	2	14	0	655
8	366	1,411	8	59	0	1,844
9	3,254	726	5	41	0	4,026
Total	15,015	8,553	60	334	48	24,010

*Data compiled on January 27, 2005. **These permits regulate permittees/co-permittees, not necessarily facilities.

Table 6 lists the total number of violations of NPDES stormwater permits by Water Board office for each of the past four fiscal years. The table shows first an increase in the number of violations over the first two years followed by a decrease during the last two fiscal years.

Table 6: Number of Violations of NPDES Stormwater Permits by Fiscal year (July 1 to June 30) From 2000-2001 to 2003-2004

Violations of NPDES Stormwater Waste Discharge Requirements				
Regional Office	2000 – 2001	2001 – 2002	2002 - 2003	2003 - 2004
1	71	57	50	85
2	129	87	88	14
3	28	72	59	20
4	505	1,404	1,096	746
5F	8	9	4	60
5R	64	28	146	17
5S	60	26	79	308
6A	37	64	68	85
6B	38	86	3	1
7	7	11	22	0
8	769	614	332	201
9	174	436	482	283
Total	1,890	2,894	2,429	1,820

* Data compiled on January 27, 2005.

A breakdown of the storm water violations by violation type for fiscal year 2003-2004 is presented in Table 7. Approximately seven percent of NPDES stormwater violations have been identified as priority violations.

Table 7: NPDES Stormwater Violations by Category for FY 2003-2004

Breakdown of the Number of NPDES Stormwater Violations by Category for					
Description of Violation Category (See Appendix B)	Total Violations		Priority Violations		
	Number	%	Number	% of Total Priority	% of Total Violations
Violation of Non-Effluent Permit Condition	969	53%	74	57%	4%
Failure to Submit Reports or Report is Deficient	470	26%	3	2%	0%
Failure to Obtain Permit	181	10%	0	0%	0%
Failure to Pay Fees	111	6%	44	34%	2%
Unregulated Discharge	27	1%	8	6%	0%
Other Effluent Violation	23	1%	0	0%	0%
Previous Enforcement Action	12	1%	0	0%	0%
Basin Plan Prohibition	10	1%	0	0%	0%
Category 2 Pollutant	5	0%	0	0%	0%
Compliance Schedule	3	0%	0	0%	0%
Sanitary Sewer Overflow	3	0%	1	1%	0%
Category 1 Pollutant	3	0%	0	0%	0%
Failure to Notify Per Requirement	2	0%	0	0%	0%
Acute Toxicity	1	0%	0	0%	0%
Total	1,820		130		7%

*Data compiled on January 27, 2005.

(B) A record of the formal and informal compliance and enforcement actions taken for each violation.

Wastewater

Enforcement actions taken as a result of a violation are classified as either informal or formal. An informal enforcement action is any enforcement action taken by Water Board staff that is not defined in statute such as staff letters and notices of violation. Formal enforcement actions are statutorily recognized actions to address a violation or threatened violation such as cleanup and abatement orders. Appendix C describes the enforcement options used by the Water Boards.

Table 8: NPDES Wastewater Violations Compared to Completed Enforcement Actions

NPDES Violations Compared to Completed Enforcement Actions																
Fiscal Year	2000-2001				2001-2002				2002-2003				2003-2004			
Regional Office	Total Violations	Total Violations without Completed Enforcement Actions	Total Violations with Informal Enforcement Actions	Total Violations with Formal Enforcement Actions	Total Violations	Total Violations without Completed Enforcement Actions	Total Violations with Informal Enforcement Actions	Total Violations with Formal Enforcement Actions	Total Violations	Total Violations without Completed Enforcement Actions	Total Violations with Informal Enforcement Actions	Total Violations with Formal Enforcement Actions	Total Violations	Total Violations without Completed Enforcement Actions	Total Violations with Informal Enforcement Actions	Total Violations with Formal Enforcement Actions
1	616	175	325	139	463	203	222	122	350	202	116	54	549	256	218	90
2	512	129	74	348	369	79	49	293	307	149	13	146	183	129	9	46
3	325	124	47	190	396	125	74	280	265	157	49	107	241	168	31	56
4	1886	519	1256	682	1454	591	722	465	2090	1211	529	589	2820	1904	437	555
5F	584	76	358	210	969	495	379	111	782	94	660	58	591	219	359	14
5R	114	23	76	19	97	36	52	28	84	28	52	18	45	14	23	11
5S	973	270	340	568	585	225	170	245	546	196	200	205	530	332	128	81
6A	11	8	3	0	12	11	1	0	19	16	3	0	10	10	0	0
6B	5	0	5	0	14	5	7	2	25	7	17	1	24	9	12	3
7	233	63	120	136	214	89	78	128	264	18	203	195	272	45	200	70
8	422	115	102	298	195	35	100	70	214	82	42	92	163	70	5	88
9	288	76	170	245	180	32	143	158	236	8	228	168	574	16	547	476
Total	5969	1578	2876	2835	4948	1926	1997	1902	5182	2168	2112	1633	6002	3172	1969	1490
Percentage		26%	48%	47%		39%	40%	38%		42%	41%	32%		53%	33%	25%

* Data compiled on January 27, 2005.

Table 8 shows the number of violations for each fiscal year since July 1, 2000. It also lists the number of violations for which there is no completed enforcement action (enforcement is still pending for some, but not all, of these violations), the number of violations that are linked to an informal enforcement action, and the number of violations that are linked to formal enforcement actions. The percentages at the bottom show each violation category as a percentage of the total number of violations. The sum of these percentages is greater than 100 percent because one violation can receive multiple enforcement actions.

Table 9 shows the percentage of violations linked to an enforcement action. While Water Board authorities for enforcement are significant, resource levels generally preclude enforcement against every violation. The general declines in numbers of enforcement actions are related to competing priorities, recent budget/staff cuts, and other factors.

Table 9: Percentage of NPDES Wastewater Violations With A Completed Enforcement Action.

Regional Board Office	2000-2001		2001 - 2002		2002 - 2003		2003 - 2004	
	Violations	With Enforcement	Violations	With Enforcement	Violations	With Enforcement	Violations	With Enforcement
1	616	72%	463	56%	350	42%	549	53%
2	512	75%	369	79%	307	51%	183	30%
3	325	62%	396	68%	265	41%	241	30%
4	1,886	72%	1,454	59%	2,090	42%	2,820	32%
5F	584	87%	969	49%	782	88%	591	63%
5R	114	80%	97	63%	84	67%	45	69%
5S	973	72%	585	62%	546	64%	530	37%
6A	11	27%	12	8%	19	16%	10	0%
6B	5	100%	14	64%	25	72%	24	63%
7	233	73%	214	58%	264	93%	272	83%
8	422	73%	195	82%	214	62%	163	57%
9	288	74%	180	82%	236	97%	574	97%
Total	5,969	74%	4,948	61%	5,182	58%	6,002	47%

Color Codes

GREEN	More than 90% of violations with completed enforcement
YELLOW	Between 80% and 90% of violations with completed enforcement
RED	Less than 80% of violations with completed enforcement

Stormwater

Table 10 shows the number of stormwater violations for each fiscal year since July 1, 2000. It also lists the number of stormwater violations addressed by informal and formal enforcement actions. The percentages at the bottom show each violation category as a percent of the total number of violations. The sum of these percentages is greater than 100 percent because one violation can receive multiple enforcement actions.

Table 10: NPDES Stormwater Violations Compared to Completed Enforcement Actions

NPDES Stormwater Violations Compared to Enforcement Actions												
Fiscal Year	2000-2001			2001-2002			2002-2003			2003-2004		
Regional Office	Total Violations	Total Violations with Informal Enforcement Actions	Total Violations with Formal Enforcement Actions	Total Violations	Total Violations with Informal Enforcement Actions	Total Violations with Formal Enforcement Actions	Total Violations	Total Violations with Informal Enforcement Actions	Total Violations with Formal Enforcement Actions	Total Violations	Total Violations with Informal Enforcement Actions	Total Violations with Formal Enforcement Actions
1	71	10	58	57	11	46	50	5	44	85	10	75
2	129	94	117	87	48	26	88	36	45	14	1	9
3	28	26	5	72	58	19	59	50	32	20	18	30
4	505	301	267	1404	1045	540	1096	992	339	746	686	185
5F	8	4	4	9	0	9	4	3	2	60	33	18
5R	64	58	5	28	26	3	146	93	71	17	17	4
5S	60	37	24	26	18	18	79	76	20	308	163	147
6A	37	26	7	64	30	8	68	31	6	85	38	7
6B	38	4	31	86	62	12	3	1	2	1	0	0
7	7	3	0	11	10	0	22	21	1	0	0	0
8	769	712	33	614	585	26	332	358	22	201	171	13
9	174	93	159	436	164	195	482	307	413	283	138	222
Total	1890	1368	710	2894	2057	902	2429	1973	997	1820	1275	710
Percentage		72%	38%		71%	31%		81%	41%		70%	39%

* Data compiled on January 27, 2005. A "Total Violations without Completed Enforcement Action" column has not been included as in Table 8 for wastewater because the numbers would all be zero due to data entry problems.

Table 10 does not include a column for "total violations without completed enforcement actions" as is included in Table 8 for the wastewater reporting because presently violations are being entered into the database only when enforcement action is taken. Improvements in data entry are being developed to correct this problem.

(C) An analysis of the effectiveness of current policies, including mandatory minimum penalties (MMPs).

Mandatory Minimum Penalties (MMPs)

Background

California Water Code section 13385 requires MMPs for specified violations of NPDES permits. For violations that are subject to those MMPs, the Water Board must either assess an Administrative Civil Liability (ACL) for the minimum penalty or assess an ACL for a greater amount. California Water Code section 13385(h) requires a MMP of \$3,000 for each “serious” violation. A serious violation is defined as any waste discharge that exceeds the effluent limitation for a Group I pollutant by 40 percent or more, or a Group II pollutant by 20 percent or more.

The Water Boards are also required by California Water Code section 13385(i) to assess MMPs of \$3,000 for multiple non-serious violations. This penalty applies when the discharger does any of the following four or more times in any period of six consecutive months:

- 1) Violates effluent limitations;
- 2) Fails to file a report of waste discharge pursuant to California Water Code section 13260;
- 3) Files an incomplete report of waste discharge pursuant to California Water Code section 13260; or
- 4) Violates a toxicity effluent limitation where the WDR does not contain pollutant-specific effluent limitations for toxic pollutants.

California Water Code section 13385(j) includes several limited exceptions to the mandatory minimum penalty provisions. The primary exceptions are for discharges that are in compliance with a cease and desist order or time schedule order under narrowly specified conditions. California Water Code section 13385(k) provides an alternative to assessing MMPs against a publicly owned treatment works (POTW) that serves a small community, “as defined by subdivision (b) of Section 79084”. Under this alternative, the Water Boards may require the POTW to spend an amount equivalent to the mandatory minimum penalty toward a compliance project that is designed to correct the violations.

In September 2003, Assembly Bill 1541 (Chapter 609, Statutes of 2003), added section 13385.1 to the California Water Code, effective January 1, 2004. That section defines the term “effluent limitation” and expands the definition of a “serious violation” in California Water Code section 13385(h) to include failure to file a discharge monitoring report for each 30 days it is late.

Section 13385.1 also re-defines MMPs as applicable only to permits in which the location of the discharge is specified. Most general NPDES permits do not specify the location of discharge and are therefore no longer subject to MMPs for effluent or reporting violations. Prior Water Board Enforcement Reports identified effluent violations under general permits as subject to MMPs. The following MMP discussions and data do not include violations of effluent and reporting requirements under general NPDES permits.

Summary of MMP Violations and MMP Enforcement Actions

Current records show a total of 8,426 effluent violations and 756 reporting violations for individual permits since the inception of these MMPs. Some portion of the reported effluent violations may qualify for statutory exemptions. MMPs have been issued for 60% of the effluent violations and 6% of reporting violations to date. Enforcement actions are pending for the vast majority of the remaining violations.

In the following discussion and analysis of the effectiveness of MMPs, we separate effluent violations effective since January 1, 2000 from reporting violations effective January 1, 2004.

Effluent Violations

According to the SWIM database, 8,426 MMP effluent violations occurred between January 1, 2000 and June 30, 2004. Of these, 5,047 (60 percent) are recorded as having received a minimum or greater penalty. Appendix D lists the 348 facilities where these MMP violations occurred. Appendix D also shows which violations have had the minimum penalty or a larger ACL assessed.

Table 11 summarizes the data from Appendix D and shows the number of violations that have had penalties issued by each Water Board office.

Table 11: Status of Effluent Violations Subject to MMPs From January 2000 to June 2004

Regional Office	TOTAL MMP EFFLUENT VIOLATIONS January 2000 June 2004	EFFLUENT VIOLATIONS With MMP/ACL ENFORCEMENT	EFFLUENT VIOLATIONS Without Completed MMP/ACL ENFORCEMENT	% Without
1	647	92	555	86%
2	1,027	777	250	24%
3	462	358	104	23%
4	2,622	1,595	1,027	39%
5F	704	109	595	85%
5R	85	25	60	71%
5S	1,341	752	589	44%
6A	4	-	4	NA
6B	-	-	-	NA
7	440	301	139	32%
8	687	631	56	8%
9	407	407	-	0%
TOTAL	8,426	5,047	3,379	40%

Last year, the Water Board Enforcement Report identified 459 facilities had accumulated a total of 7,812 MMP effluent violations (see Appendix D in of 2003 report). Of those violations, 42 percent received either an MMP or an ACL. Appendix D now lists 348 facilities and a total of 8,426 MMP violations. This decrease in the number of facilities subject to MMPs is due to a statute change on January 1, 2004, which redefines MMPs as applicable only where the permit

identifies the location of discharge. General permits usually have not specified the location of discharge, and these permits account for the drop in the number of facilities.

Table 12 lists the number of facilities in each Water Board office that have one or more MMP violations, the number of facilities for which MMPs have been issued for all MMP violations, and the number of facilities that would require at least one enforcement action to cover the outstanding MMP violations. As shown, 259 or more enforcement actions would be necessary to cover the 3,379 violations subject to MMPs. From January 1, 2000 to June 30, 2004 the Water Boards have issued a total of 356 enforcement actions at or above the mandatory minimum penalty amount.

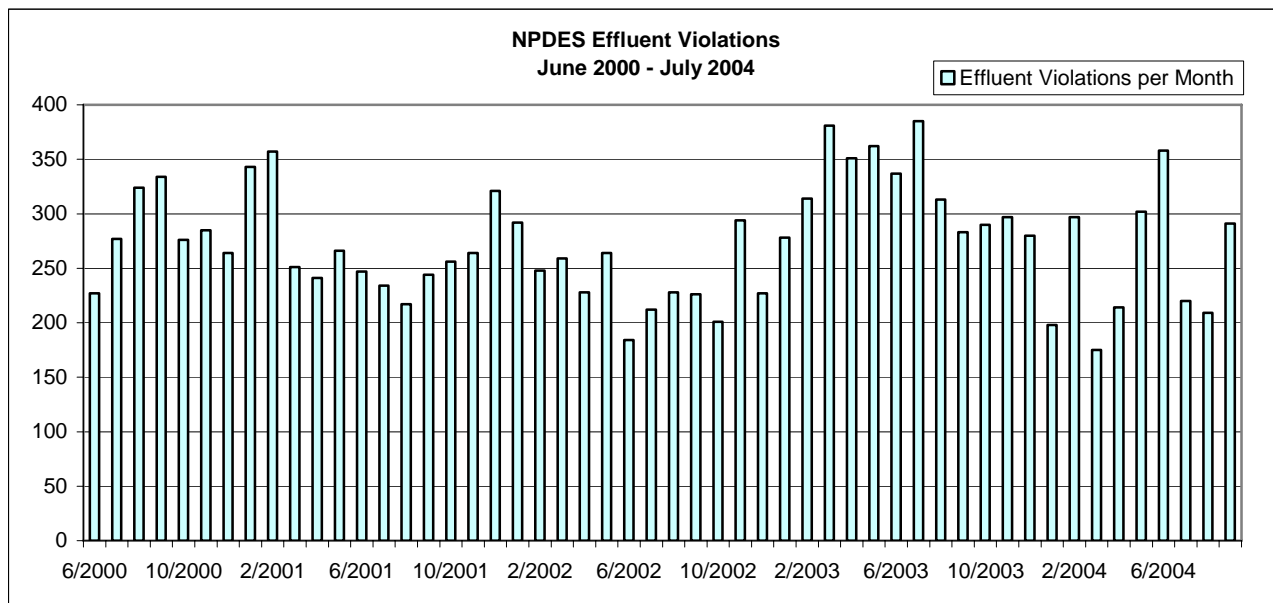
Table 12: Facilities With MMP Effluent Violations and Pending Enforcement Actions January 2000 to June 2004

Regional Office	Facilities with MMP effluent violations	Facilities with all MMP penalties issued	Facilities with pending MMP penalties
1	24	0	24
2	57	15	42
3	16	9	7
4	111	27	84
5F	15	2	13
5R	13	2	11
5S	61	14	47
6A	1	0	1
6B	0	0	0
7	18	1	17
8	21	9	12
9	11	10	1
TOTAL	348	89	259

Effectiveness of Mandatory Minimum Penalties on Effluent Violations

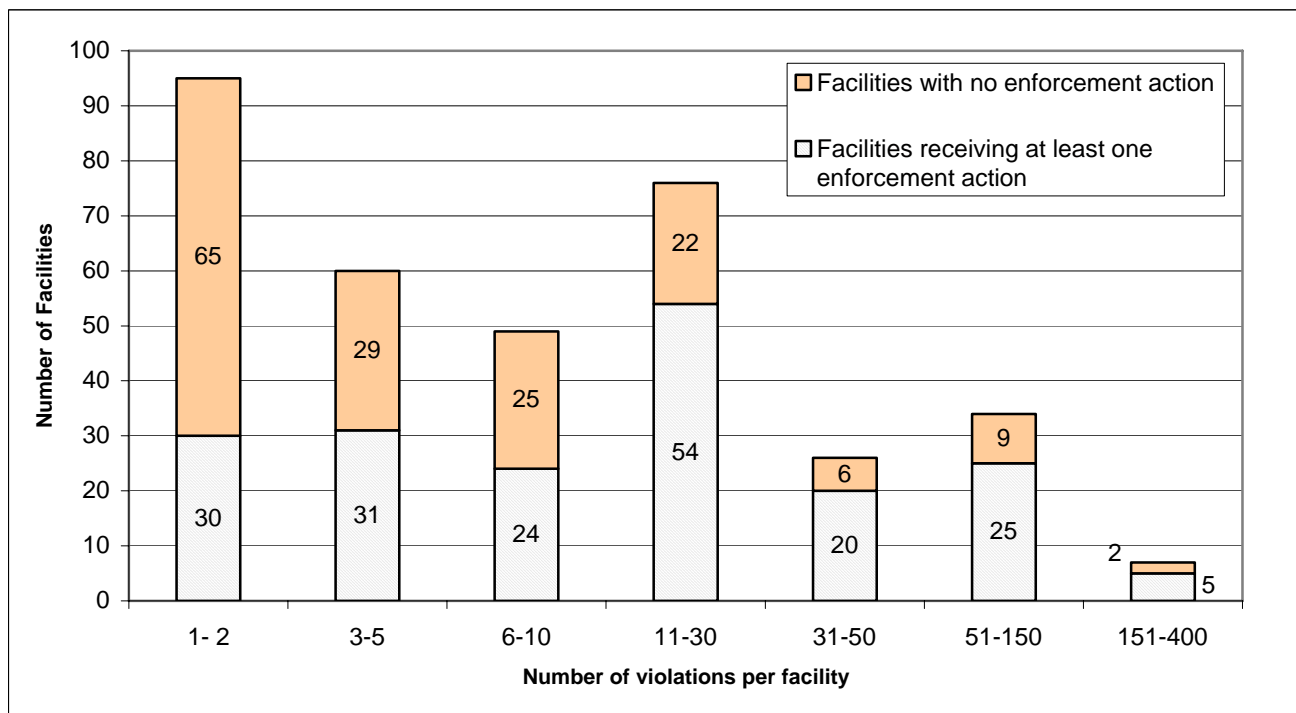
Last year, the Water Board Enforcement Report observed an overall reduction in the number of effluent violations at NPDES facilities. We believed that reduction was at least partly a result of increased compliance due to the deterrent effect of MMPs. Since then, data entry has improved and this previous observation is no longer correct. Figure 1 plots effluent violations for each month from June 2000 through July 2004. Since moderate declines and increases characterize this data, the graph basically shows that we are unable to draw any conclusions from the available data about the effectiveness of MMPs on effluent violations.

Figure 1: NPDES Effluent Violations From June 2000 – July 2004.



In analyzing the effectiveness of MMPs on compliance levels, we use Figure 2 to look at MMP effluent violations per facility since January 2000. The numbers that generate Figure 2 indicate 58 percent of facilities have incurred ten or fewer MMP violations; and 12 percent of facilities with MMP violations have more than fifty MMP violations each.

Figure 2: Distribution of MMP Effluent Violations and Penalties by Facility



Approximately 58 percent of facilities with 1-10 MMP violations each have not been issued an MMP, compared to only 27% of facilities with 11-800 MMP violations. The Water Boards generally prioritize MMP issuance to facilities with greater compliance problems because of the staff resource costs associated with issuing MMPs and ACLs. Of the 190 facilities that received one or more penalties, 89 (47%) have not reported any more violations that are subject to MMPs.

Reporting Violations

Beginning January 1, 2004, Water Code Section 13385.1 specifies MMPs of \$3,000 each for certain¹ NPDES self-monitoring reports that are more than 30 days late. Each 30-day period is defined as a “serious violation” and penalties accrue for every serious violation.

SWIM data shows 143 reports more than 30 days late, accounting for 756 serious violations subject to MMPs. Table 13 shows the distribution of these serious reporting violations among the Regional Boards.

Table 13: NPDES Reports Subject to Mandatory Minimum Penalties. Reports Due Between January 1 And June 30, 2004

Region	Late reports (received more than 30 days late)	Serious violations for late reports	Missing reports (more than 30 days overdue)	Serious violations for missing reports	Total reports more than 30 days late	Total serious violations to date
1	7	18	3	31	10	49
2	-	-	8	71	8	71
3	1	1	-	-	1	1
4	49	133	13	112	62	245
5R	3	6	4	38	7	44
5S	9	13	27	236	36	249
5F	15	56	3	30	18	86
6A	-	-	-	-	-	-
6B	-	-	-	-	-	-
7	-	-	1	11	1	11
8	-	-	-	-	-	-
9	-	-	-	-	-	-
Total	84	227	59	529	143	756

Because many of the 84 late reports were more than 30 days late, those reports actually represent 227 serious violations. Similarly, the 59 overdue reports represent 529 serious violations because many reports are multiple 30-day periods late. Every outstanding report continues to accumulate penalties every 30 days until the report is received.

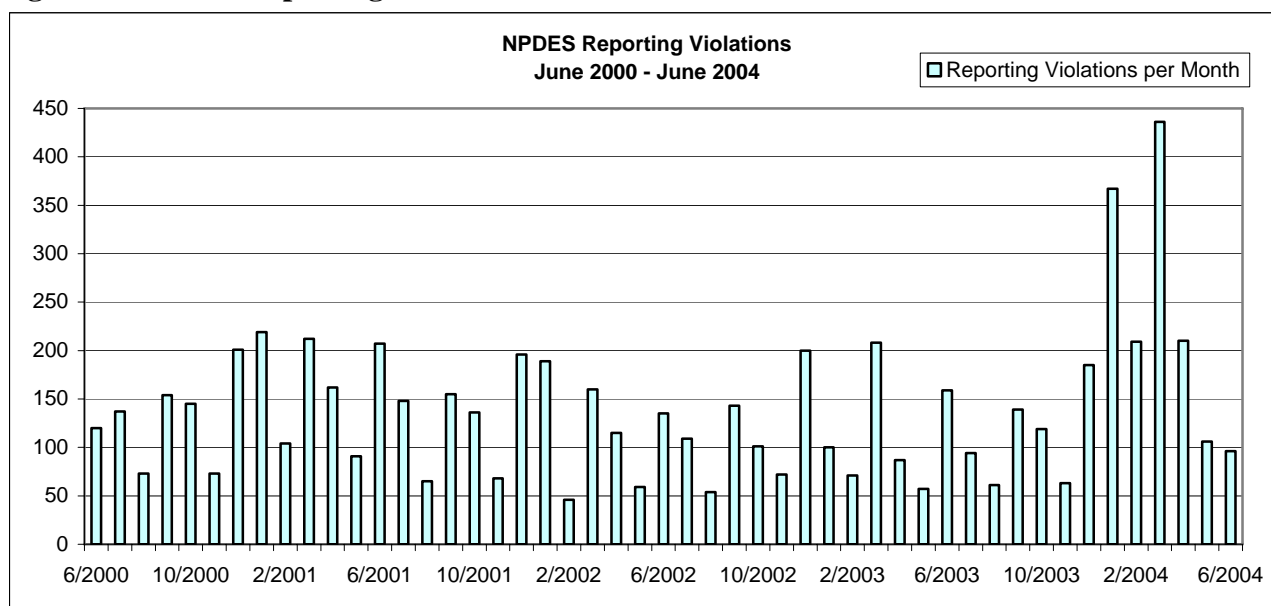
Issuance of MMPs for serious reporting violations has been minimal to date as the Water Boards adjust to these new requirements. The Los Angeles Regional Water Board (Region 4) has issued 18 enforcement actions for 19 late reports addressing a total of 33 serious reporting violations. The Santa Ana Regional Water Board (Region 8) has issued two MMP actions for 14 serious reporting violations.

¹Applies to NPDES permits that specify the location of discharge.

Effectiveness of Mandatory Minimum Penalties on Reporting Violations

Figure 3 plots reporting violations for each month from July 1999 through June 2004. A slightly declining level of reporting violations is interrupted by an upswing in the first six months of 2004. We believe this increase is the result of increased Water Board efforts in tracking reports due and received as they are now subject to MMPs.

Figure 3: NPDES Reporting Violations From June 2000 – June 2004



At this early stage in the implementation of the reporting MMP statute, there is not enough data to evaluate the impact of this new mandate on compliance rates for permittee reporting.

Overall effectiveness

The data presented in the tables throughout this report provide various perspectives on Water Board effectiveness relative to violations and enforcement actions. Having this data in a database and being able to use it is a significant accomplishment over the last five years. Having the data also reveals a workload greater than was recognized without the data.

Despite issuing over \$50 million in total penalties over the past four fiscal years, and despite the changes from Fiscal Year 1996-1997 when only 5 percent of violations resulted in a formal enforcement action and 1 percent resulted in the assessment of an administrative civil liability,² the overall conclusion from review of the data is that the Water Boards need to further improve their effectiveness in handling violations and enforcement actions. However, despite this overall conclusion, there are success stories. A case in point is the San Diego Water Board (Region 9). That Water Board has organized a three-step enforcement approach to 1) review compliance levels based on violations, 2) prioritize their limited resources for response with appropriate enforcement, and 3) monitor their performance. This approach implements the Water Boards'

² Legislative Analyst Office Analysis of 1999-2000 Budget Bill Resources Department 3 Issues.

Enforcement Policy and it works as illustrated by the data in this report. The San Diego Water Board's performance displayed in Tables 8 and 9, for instance, well exceeds others.

The Water Boards' Water Quality Enforcement Policy was adopted in 2002 (<http://www.waterboards.ca.gov/plnspols/docs/wqep.doc>). It creates a framework for identifying and investigating instances of noncompliance, for taking enforcement actions that are appropriate in relation to the nature and severity of the violation, and for prioritizing enforcement resources to achieve maximum environmental benefits.

The Policy includes the following elements:

- An overview of water quality enforcement options.
- A process for identifying enforcement priorities and choosing the appropriate enforcement response.
- Provisions for more efficient use of standardized, enforceable permit and enforcement order language.
- Information to assist in integrated enforcement efforts with other agencies.
- Procedures for response to fraudulent reporting or knowingly withholding data.
- Specific guidance regarding assessment of administrative civil liability, use of supplemental environmental projects and compliance projects, handling of criminal activities, and standards for violation and enforcement reporting.

The concepts and approaches of the Enforcement Policy are sound and provide appropriate approaches, practices, and considerations for effective enforcement. Improved implementation of the Enforcement Policy is needed to achieve its framework for effectiveness. The San Diego Water Board experience demonstrates this.

The Water Boards have been facing multiple competing priorities and pressures that have limited opportunities to implement the Enforcement Policy provisions. Issuing permits, for example, has become more complex and contentious in recent years. It has drawn staff resources away from dealing with violations and enforcement because of discharger reactions and challenges related to the California Toxics Rule, to MMPs, and to other factors. The number of permits each staff is responsible for issuing, overseeing, and enforcing has increased from 49 in Fiscal Year 2000/2001 to 74 in Fiscal Year 2003-2004. MMPs have also changed enforcement priorities by mandating formal enforcement actions in response to violations that, given their relative threat to water quality, were often resolved through informal enforcement actions before.

To overcome these obstacles and improve implementation of the Enforcement Policy, the Water Boards are undertaking the following actions to increase staff efficiencies, prioritize enforcement activities, and increase management oversight:

1. Standardize NPDES permitting to the extent feasible to restore certainty and expectations for staff and dischargers, to restore efficiency and performance to these efforts, and to return diverted staff resources to address violations and enforcement.
2. Standardize the issuance of MMPs to maximize efficiency and minimize the resource impacts of these new requirements.
3. Explore the implementation of a statewide, consistent process to prioritize and target enforcement actions towards 1) violations that pose a significant threat to the

environment or human health, 2) violations that show a pattern of chronic non-compliance, and 3) violations that require MMPs. This approach will provide for regular management review and prioritization of cases, assignment for action, and review of progress. The San Diego Water Board is a model of this approach.

4. Deploy an e-government system that enables dischargers to make required compliance monitoring submittals to the Water Boards through the Internet. The system will capture compliance data directly from dischargers, analyze the submittals for and flag violations, and replace most manual data entry of discharger reporting at the Water Boards. The efficiencies so gained will return diverted staff to the regulatory roles of addressing violations and enforcement.
5. Conduct a semiannual statewide review of our compliance progress within the Water Boards. In-depth analysis of statewide and region specific caseloads, types of priority cases, effective and ineffective actions, and trends in compliance rates and pollutants discharged will support this review.
6. Institute a "Compliance Report Card" on the Internet to engage the public in a productive dialogue about discharger performance, environmental effects, Water Board workload, and Water Board performance.

Appendix A

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARDS

North Coast Region (1)

5550 Skylane Blvd Suite A
 Santa Rosa, CA, 95403
 Catherine E. Kuhlman, EO
 TEL: (707) 576-2220
 FAX: (707) 523-0135

San Francisco Bay Region (2)

1515 Clay Street,
 Suite 1400
 Oakland, CA, 94612
 Bruce H. Wolfe, EO
 TEL: (510) 622-2300
 FAX: (510) 622-2460

Central Coast Region (3)

895 Aerovista Place
 Suite 101
 San Luis Obispo, CA 93401
 Roger W. Briggs, EO
 TEL: (805) 549-3147
 FAX: (805) 543-0397

Los Angeles Region (4)

320 W. 4th St., Suite 200
 Los Angeles, CA, 90013
 Jonathan Bishop, EO
 TEL: (213) 576-6600
 FAX: (213) 576-6640

Central Valley Region (5S)

11020 Sun Center Drive #200
 Rancho Cordova, CA 95670-6114
 Thomas R. Pinkos, EO
 TEL: (916) 464-3291
 FAX: (916) 464-

Fresno Office (5F)

3614 East Ashlan Ave
 Fresno, CA, 93726
 Loren J. Harlow, AEO
 TEL: (559) 445-5116
 FAX: (559) 445-5910

Redding Office (5R)

415 Knollcrest Drive
 Redding, CA, 96002
 Jim Pedri, AEO
 TEL: (530) 224-4845
 FAX: (530) 224-4857

Lahontan Region (6SLT)

2501 Lake Tahoe Blvd.
 South Lake Tahoe, CA,
 96150
 Harold J. Singer, EO
 TEL: (530) 542-5400
 FAX: (530) 544-2271

Victorville Office (6V)

15428 Civic Dr, Suite 100
 Victorville, CA, 92392
 Hisam A. Baqui, SWRCE
 TEL: (760) 241-6583
 FAX: (760) 241-7308

Colorado River Basin Region (7)

73-720 Fred Waring Drive
 Suite 100
 Palm Desert, CA, 92260
 Robert Perdue, EO
 TEL: (760) 346-7491
 FAX: (760) 341-6820

Santa Ana Region (8)

3737 Main Street, Suite 500
 Riverside, CA, 92501-3339
 Gerald J. Thibeault, EO
 TEL: (909) 782-4130
 FAX: (909) 781-6288

San Diego Region (9)

9174 Sky Park Court.
 Suite 100
 San Diego, CA, 92123
 John Robertus, EO
 TEL: (858) 467-2952
 FAX: (858) 571-6972



State of California
 Arnold Schwarzenegger, *Governor*

California Environmental Protection Agency
 Dr. Alan Lloyd, *Secretary*

State Water Resources Control Board
 Arthur G. Baggett Jr., *Chairman*

Appendix B

**LISTING AND DESCRIPTIONS OF VIOLATION TYPES USED
IN THE SWIM DATA SYSTEM**

Violation Type	Description																																												
CAT1	<p>Category 1 pollutant – Category 1 pollutants as defined by USEPA include:</p> <table style="width: 100%; border: none;"> <tr> <td style="width: 60%;">Oxygen Demand</td> <td><u>Minerals</u></td> </tr> <tr> <td>Biochemical Oxygen Demand</td> <td>Calcium</td> </tr> <tr> <td>Chemical Oxygen Demands</td> <td>Chloride</td> </tr> <tr> <td>Total Organic Carbon</td> <td>Fluoride</td> </tr> <tr> <td>Other</td> <td>Magnesium</td> </tr> <tr> <td></td> <td>Sodium</td> </tr> <tr> <td></td> <td>Potassium</td> </tr> <tr> <td>Solids</td> <td>Sulfur</td> </tr> <tr> <td>Total Suspended Solids (Residues)</td> <td>Sulfate</td> </tr> <tr> <td>Total Dissolved Solids (Residues)</td> <td>Total Alkalinity</td> </tr> <tr> <td>Other</td> <td>Total Hardness</td> </tr> <tr> <td></td> <td>Other Minerals</td> </tr> <tr> <td>Nutrients</td> <td></td> </tr> <tr> <td>Inorganic Phosphorus Compounds</td> <td>Metals</td> </tr> <tr> <td>Inorganic Nitrogen Compounds</td> <td>Aluminum</td> </tr> <tr> <td>Other</td> <td>Cobalt</td> </tr> <tr> <td></td> <td>Iron</td> </tr> <tr> <td>Detergents and Oils</td> <td>Vanadium</td> </tr> <tr> <td>MBAS</td> <td></td> </tr> <tr> <td>NTA</td> <td></td> </tr> <tr> <td>Oil and Grease</td> <td></td> </tr> <tr> <td>Other detergents or algaecides</td> <td></td> </tr> </table>	Oxygen Demand	<u>Minerals</u>	Biochemical Oxygen Demand	Calcium	Chemical Oxygen Demands	Chloride	Total Organic Carbon	Fluoride	Other	Magnesium		Sodium		Potassium	Solids	Sulfur	Total Suspended Solids (Residues)	Sulfate	Total Dissolved Solids (Residues)	Total Alkalinity	Other	Total Hardness		Other Minerals	Nutrients		Inorganic Phosphorus Compounds	Metals	Inorganic Nitrogen Compounds	Aluminum	Other	Cobalt		Iron	Detergents and Oils	Vanadium	MBAS		NTA		Oil and Grease		Other detergents or algaecides	
Oxygen Demand	<u>Minerals</u>																																												
Biochemical Oxygen Demand	Calcium																																												
Chemical Oxygen Demands	Chloride																																												
Total Organic Carbon	Fluoride																																												
Other	Magnesium																																												
	Sodium																																												
	Potassium																																												
Solids	Sulfur																																												
Total Suspended Solids (Residues)	Sulfate																																												
Total Dissolved Solids (Residues)	Total Alkalinity																																												
Other	Total Hardness																																												
	Other Minerals																																												
Nutrients																																													
Inorganic Phosphorus Compounds	Metals																																												
Inorganic Nitrogen Compounds	Aluminum																																												
Other	Cobalt																																												
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Detergents and Oils	Vanadium																																												
MBAS																																													
NTA																																													
Oil and Grease																																													
Other detergents or algaecides																																													
CAT2	<p><u>Category 2 pollutant</u> – Category 2 pollutants as defined by USEPA:</p> <p><u>Metals</u> (all forms) Other metals not specifically listed under Group I</p> <p>Inorganic Cyanide Total Residual Chlorine</p> <p>Organics All organics are Group II except those specifically listed under Group I.</p>																																												
OEV	<u>Other effluent violation</u> – Any violation of an effluent requirement not cover under Category 1 or Category 2.																																												
CTOX	<u>Chronic Toxicity</u> – Violation of a chronic toxicity effluent requirement.																																												
ATOX	<u>Acute Toxicity</u> – Violation of an acute toxicity effluent requirement.																																												
PRMC	<u>Violation of Non-effluent Permit Condition</u> – Violation of any permit condition not pertaining to effluent requirements.																																												
RPT	<u>Failure to submit reports or report is deficient</u> – Failure to submit a report or a report that is either not complete or contains errors.																																												
CSCH	<u>Compliance schedule</u> – Failure to comply with a compliance schedule in a permit. This does not include schedules in an enforcement order likes a Cease & Desist and Time Schedule Orders.																																												
PRET	<u>Pretreatment</u> – Any permit violation related to a pretreatment program.																																												
SSO	<u>Sanitary Sewer Overflow</u> – Any spill from a sanitary sewer collection system or pump station.																																												

Appendix B

**LISTING AND DESCRIPTIONS OF VIOLATION TYPES USED
IN THE SWIM DATA SYSTEM**

Violation Type	Description
UNRD	<u>Unregulated Discharge</u> – Any spill that is not a SSO as described above.
RLGW	<u>Release to groundwater</u> – Any release to groundwater that violates permit conditions or basin plan prohibitions.
NOTR	<u>Failure to Notify per Requirement</u> – Failure to notify the Water Board as required by permit condition.
PAYF	<u>Failure to pay fees</u> – Failure to pay permit fees. This does not include failure to pay any penalties assessed by an ACL or other enforcement action.
OBPR	<u>Failure to obtain permit</u> – Failure to obtain the appropriate permit prior to discharge or regulated activity.
PENF	<u>Previous Enforcement Order</u> – Failure to comply with a previous enforcement order by not meeting its requirements, its time schedule, or failure to pay penalties.
PROH	<u>Basin Plan Prohibition</u> – Violation of any basin plan prohibition.

Appendix C

Types and Classification of Enforcement Actions

Type of Enforcement Action	Description	Classification
Verbal Communication	Any communication regarding the violation that takes place in person or by telephone.	Informal
Staff Enforcement Letter	Any written communication regarding violations and possible enforcement actions that is signed at the staff level.	Informal
Notice of Violation	A letter officially notifying a discharger of a violation and the possible enforcement actions, penalties, and liabilities that may result. This letter is signed by the Executive Officer.	Informal
Notice to Comply	Issuance of a Notice to Comply per Water Code Section 13399.	Formal
13267 Letter	A letter utilizing Water Code Section 13267 authority to require further information or studies.	Formal
Clean-up and Abatement Order	Any order pursuant to Water Code Section 13304.	Formal
Cease and Desist Order	Any order pursuant to Water Codes Sections 13301-13303.	Formal
Time Schedule Order	Any order pursuant to Water Code Section 13300.	Formal
Administrative Civil Liability (ACL) Complaint	ACL Complaint issued by the Executive Officer for liability pursuant to Water Code 13385.	Formal
Administrative Civil Liability (ACL) Order	An ACL Order that has been imposed by the Water Board or SWRCB.	Formal
Settlement	A settlement agreement per California Government Code Section 11415.6	Formal
Referral	Referral to the District Attorney, Attorney General, or USEPA.	Formal
Referred to a Task Force	Any referral of a violation to an environmental crimes task force.	Formal
Referral to Other Agency	Any referral to another State Agency.	Formal
Third Party Action	An enforcement action taken by a non-governmental third party and to which the State or Water Board is a party.	Formal
Waste Discharge Requirements	Any modification or rescission of Waste Discharge Requirements in response to a violation.	Formal

Appendix D

List of Facilities with Effluent Violations Subject to MMP Actions and Violations Receiving Penalties by Water Board Office from 1-1-2000 through 6-30-2004

Water Board	Agency Name	Facility Name	WDID	MMP Violations (Includes both confirmed and alleged MMP violations)	Violations Receiving Penalty (Does not include pending Penalties)
1	SONOMA COUNTY WATER AGENCY	SCWA OCCIDENTAL CSD	1B83001OSON	119	79
1	ARCATA, CITY OF	ARCATA CITY WWTF	1B82114OHUM	93	0
1	FORT BRAGG, CITY OF	FORT BRAGG CITY WWTP	1B84083OMEN	63	0
1	TULELAKE, CITY OF	TULELAKE CITY WWTP	1A84002OSIS	61	0
1	LOLETA CSD	LOLETA POTW	1B80081OHUM	52	0
1	STOCKTON PACIFIC ENTERPRISES	LP SAMOA PULPMILL	1B77005OHUM	42	12
1	FORESTVILLE WATER DISTRICT	FORESTVILLE CSD	1B83100OSON	36	0
1	FERNDALE, CITY OF	FERNDALE CITY POTW	1B83136OHUM	31	0
1	MCKINLEYVILLE CSD	MCKINLEYVILLE WWTP	1B82084OHUM	27	0
1	SONOMA COUNTY WATER AGENCY	SCWA RUSSIAN RIVER CSD	1B82045OSON	23	0
1	MENDO CO WWD #2 ANCHOR BAY	MENDOCINO CWWD#2-ANCHOR BAY	1B83118OMEN	18	0
1	CRESCENT CITY HARBOR DISTRICT	CC HARBOR SEAFOOD WW SYSTEM	1A84005ODN	15	0
1	FORTUNA, CITY OF	FORTUNA CITY WWTP	1B83135OHUM	13	0
1	GEORGIA PACIFIC CORPORATION	GP FORT BRAGG SAW	1B84089OMEN	12	0
1	SONOMA COUNTY WATER AGENCY	SCWA GRATON CSA NO. 2	1B84060OSON	12	0
1	HCRID #1	SHELTER COVE POTW	1B84086OHUM	8	0
1	CRESCENT CITY, CITY OF	CRESCENT CITY WWTP	1A84006ODN	6	0
1	REDWAY CSD	REDWAY POTW	1B83147OHUM	6	0
1	COLLEGE OF THE REDWOODS	COLLEGE OF THE REDWOODS, POTW	1B80121OHUM	2	0
1	EUREKA, CITY OF	EUREKA CITY ELK RIVER WWTP	1B82151OHUM	2	1
1	MENDOCINO CITY CSD	MENDOCINO CITY CSD	1B83129OMEN	2	0
1	WILLITS, CITY OF	WILLITS CITY WWTP	1B80078OMEN	2	0
1	RIO DELL, CITY OF	RIO DELL CITY WWTF	1B83134OHUM	1	0
1	YREKA, CITY OF	YREKA CITY WWTP	1A84073OSIS	1	0
Total				647	92

2	NAPA SANITATION DISTRICT	NAPA SD WWTP	2 283009001	65	48
2	HANSON AGGREGATES	4501 TIDEWATER AVE, OAKLAND	2 019216001	63	0
2	RICHMOND, CITY OF	RICHMOND WPCP	2 071037001	61	59
2	PALO ALTO, CITY OF	PALO ALTO REGIONAL WQC PLANT	2 438011001	56	57
2	HANSON AGGREGATES	HANSON AGGREGATES - SF	2 386028001	55	55
2	PETALUMA, CITY OF	PETALUMA WPCP	2 494006001	55	55
2	PACIFICA, CITY OF	CALERA CRK WTR RECYCLING PLANT	2 417022002	54	23
2	SONOMA VALLEY COUNTY S. D.	SONOMA VALLEY COUNTY S.D. WWTP	2 494009001	47	44

Water Board	Agency Name	Facility Name	WDID	MMP Violations (Includes both confirmed and alleged MMP violations)	Violations Receiving Penalty (Does not include pending Penalties)
2	FAIRFIELD-SUISUN SEWER DISTRICT	FSSD SUBREGIONAL WWTP	2 482005001	43	20
2	SOUTH SAN FRANCISCO STP	S SF/SAN BRUNO WQCP	2 417038001	39	38
2	NOVATO SANITARY DISTRICT	NOVATO AND IGNACIO STP	2 215022001	35	15
2	PACIFICA, CITY OF	PACIFICA WWTP	2 417022001	35	35
2	C & H SUGAR	C & H SUGAR WWTP	2 071006001	33	33
2	GENERAL CHEMICAL	GENERAL CHEMICAL- WWTP	2 071001001	28	25
2	CALISTOGA, CITY OF	CALISTOGA WW TREATMENT PLANT	2 283003001	24	23
2	SAN MATEO, CITY OF	SAN MATEO WQCP	2 417035001	23	21
2	SUNNYVALE, CITY OF	SUNNYVALE STP	2 438018001	22	11
2	SEWER AUTHORITY MID-COASTSIDE	SAM WWTP	2 417068001	21	20
2	LAS GALLINAS VALLEY S.D.	LAS GALLINAS WWTP	2 215012001	20	18
2	CONTRA COSTA CO	PORT COSTA WWTP	2 071034001	19	0
2	VALLEJO SAN AND FLOOD CONT DIS	VALLEJO SFCD WWTP	2 482012001	18	16
2	BENICIA, CITY OF	BENICIA WWTP	2 482001001	17	16
2	RODEO SANITARY DISTRICT	RODEO SD	2 071039001	17	11
2	WEST COUNTY AGENCY	COMBINED OUTFALL	2 071107001	17	11
2	CENTRAL MARIN SANITATION AGENCY	CENTRAL MARIN SAN. AGCY. WWTP	2 215116001	14	13
2	SAUSALITO-MARIN CITY SAN DIST	SAUSALITO STP	2 215023001	14	13
2	CALIF. DEPT. OF PARKS & RECR.	ANGEL ISLAND STATE PK - WWTP	2 215002001	12	11
2	PINOLE, CITY OF	CITY OF PINOLE WWTP	2 071032001	12	9
2	TESORO REFINING & MARKETING CO	GOLDEN EAGLE REFINERY-NPDES	2 071048001	12	11
2	BURLINGAME, CITY OF	BURLINGAME WWTP	2 417005001	11	10
2	SAN FRANCISCO, CITY AND CO	SF INT AIRPORT WQCP	2 417032001	11	10
2	SAN FRANCISCO, CITY AND CO	SF INT AIRPORT IND WTP	2 417033001	9	4
2	DELTA DIABLO SANITATION DIST.	DELTA DIABLO SAN. DIST. WWTP	2 071013001	8	8
2	GENERAL ELECTRIC COMPANY	VALLECITOS NUCLEAR CENTER	2 019018001	6	4
2	CONOCOPHILLIPS	SAN FRANCISCO REFINERY, RODEO	2 071051001	5	2
2	LIVERMORE, CITY OF	LIVERMORE WPCP	2 019025001	5	5
2	DUBLIN SAN RAMON SERVICES DIST	DUBLIN SAN RAMON SD WWTP	2 019033001	4	4
2	SAN FRANCISCO, CITY & CO	BAYSIDE CSO	2 386010003	4	3
2	SOUTH BAYSIDE SYSTEM AUTHORITY	SBSA WWTP	2 417037001	4	0
2	NEW CENTURY BEVERAGE COMPANY	BOTTLING GROUP LLC	2 019320001	3	2
2	SEWERAGE AGENCY OF SO. MARIN	SASM WWTP	2 215015001	3	2
2	AMERICAN CANYON, CITY OF	AMERICAN CANYON, CITY OF WWTP	2 283021001	2	0
2	KOBE PRECISION INC	KOBE PRECISION INC	2 019328001	2	2
2	MARTINEZ REFINING CO	SHELL MARTINEZ REFINRY	2 071042001	2	2
2	SANTA CLARA CO ROADS & AIRPORT	OREGON EXP UNDERPASS	2 438265002	2	2
2	SOUTHERN ENERGY CALIFORNIA	PITTSBURG POWER PLANT	2 071030001	2	0
2	USS-POSCO	USS-POSCO IND	2 071059001	2	1

Water Board	Agency Name	Facility Name	WDID	MMP Violations (Includes both confirmed and alleged MMP violations)	Violations Receiving Penalty (Does not include pending Penalties)
2	ZENECA INC, WESTERN RESEARCH	ZENECA, RICHMOND PLANT	2 071185001	2	2
2	CHEVRON PRODUCTS COMPANY	RICHMOND REFINERY	2 071044001	1	0
2	EAST BAY MUNICIPAL UTILITY DIS	EBMUD SD#1-WET WTHR BYPASS	2 019014002	1	0
2	MOUNTAIN VIEW, CITY OF	SMALL BOAT LAKE	2 438010001	1	0
2	MT. VIEW SANITARY DIST	MT. VIEW SAN. DIST. WWTP	2 071029001	1	1
2	NORTH SAN MATEO COUNTY SD	NORTH SAN MATEO WWTP	2 417021001	1	0
2	ORO LOMA SANITARY DISTRICT	ORO LOMA SD WWTP	2 019032001	1	0
2	PACIFIC GAS & ELECTRIC CO	HUNTERS POINT POWER PL	2 386003001	1	1
2	SAN FRANCISCO, CITY & CO	SF - SE NORTH POINT & BAYSIDE	2 386010001	1	1
2	SAN JOSE/SANTA CLARA WPCP	SAN JOSE/SANTA CLARA WPCP	2 438014001	1	0
			Total	1027	777

3	PISMO BEACH, CITY OF	PISMO BEACH WWTP	3 400106001	142	72
3	CA DEPT OF CORRECTIONS	CALIFORNIA MEN'S COLONY	3 400108001	131	124
3	CA STATE PARKS	BIG BASIN WWTP	3 440800001	46	46
3	HIGHLANDS SA	HIGHLANDS SA WWTP	3 270115001	31	18
3	RAGGED POINT INN	RAGGED POINT INN MOTEL	3 401001001	23	22
3	SAN LUIS OBISPO, CITY OF	SAN LUIS OBISPO WWTP	3 400107001	23	23
3	SANTA BARBARA CITY PWD	EL ESTERO WWTP NPDES	3 420108001	15	15
3	LOMPOC, CITY OF	LOMPOC REGIONAL WWTP	3 420105001	12	12
3	DUKE ENERGY MORRO BAY LLC	DUKE MORRO BAY POWER PLANT	3 402003002	10	4
3	MORRO BAY & CAYUCOS SD	MORRO BAY/CAYUCOS WWTP	3 400103001	10	10
3	PASO ROBLES, CITY OF	PASO ROBLES WWTP	3 400105001	6	3
3	RMC PACIFIC MATERIALS INC	RMC LONESTAR SANTA CRUZ CEMENT	3 442004003	5	1
3	CARPINTERIA SD	CARPINTERIA SD WWTP	3 420101001	3	3
3	CARMEL AREA WWD	CARMEL AREA WWTP	3 270101001	2	2
3	SAN SIMEON CSD	SAN SIMEON WWTP	3 400110001	2	2
3	GOLETA SD	GOLETA SD WWTP	3 420102001	1	1
			Total	462	358

4	SANTA PAULA, CITY OF	SANTA PAULA WWRP	4A560108001	802	802
4	SAN BUENAVENTURA, CITY OF	VENTURA WWRP	4A560107001	237	39
4	WHEELABRATOR NORWALK ENERGY CO	STATE HOSPITAL COGENERATION PT	4B191168001	187	0
4	PRAXAIR, INC.	PRAXAIR, WILMINGTON	4B192140001	95	8
4	FILLMORE, CITY OF	FILLMORE WWTP	4A560101002	92	92
4	MCA / UNIVERSAL CITY STUDIOS	UNIVERSAL CITY STUDIOS	4B199017001	88	88
4	LA CO SANITATION DISTRICTS	VALENCIA WWRP	4A190107023	82	0
4	CAMARILLO SANITARY DISTRICT	CAMARILLO WATER RECLAM. PLANT	4A560100001	73	56
4	LOS ANGELES CITY OF DWP	HAYNES GENERATING STATION	4B193500002	63	11

Water Board	Agency Name	Facility Name	WDID	MMP Violations (Includes both confirmed and alleged MMP violations)	Violations Receiving Penalty (Does not include pending Penalties)
4	HARRIS WATER CONDITIONING	CULLIGAN WATER	4A561037001	59	3
4	ALAMEDA CORRIDOR TRANS. AUTHOR	ALAMEDA MID-CORRIDOR TRENCH PJ	4B191340001	47	47
4	SANTA CLARITA, CITY OF	DRAINAGE BEN. ASSESS AREA 6&18	4A191142001	46	31
4	LOS ANGELES CITY OF DWP	SCATTERGOOD GENERATING STATION	4B193500003	45	45
4	AES REDONDO BEACH, LLC	REDONDO GENERATING STATION	4B192111003	41	38
4	THOUSAND OAKS CITY OF DPW	HILL CANYON WWTP	4A560112001	40	38
4	AIR PRODUCTS & CHEMICALS, INC.	HYDROGEN PLANT & RELATED FAC.	4B191285001	32	2
4	VOPAK TERMINAL LOS ANGELES INC	VOPAK TERMINAL LOS ANGELES INC	4B199019002	32	32
4	ROYAL CATERING	ROYAL CATERING, EL MONTE	4B191106001	30	30
4	OJAI VALLEY SAN DIST	OJAI VALLEY WWTP	4A560104001	24	8
4	SIX FLAGS MAGIC MOUNTAIN	AMUSEMENT PARK, VALENCIA	4A199002002	24	12
4	SKYWORKS SOLUTIONS, INC.	SKYWORKS SOLUTIONS, INC.	4A562074001	22	22
4	CSU, LONG BEACH	CSU, LONG BEACH, POOL, ETC	4B190800001	20	20
4	LA CO METRO TRANS AUTHORITY	SEGMENTS 1,2A,2B,3 OPERATIONS	4B192515004	19	0
4	KINDER MORGAN (FORMER GATX)	CARSON TERMINAL	4B192238002	18	12
4	REDONDO BEACH, CITY OF	SEASIDE LAGOON	4B190143001	18	16
4	RMR PROPERTIES	RMR PROPERTIES	4B191086001	18	13
4	KINDER MORGAN (FORMER GATX)	SAN PEDRO MARINE TERMINAL	4B192124001	16	0
4	LAS VIRGENES MWD	TAPIA WRF	4B190104001	16	2
4	SIMI VALLEY, CITY OF	SIMI VALLEY WWRP	4A560110001	16	16
4	THE BOEING COMPANY	SANTA SUSANA FIELD LAB	4B562013002	14	13
4	LA CO DEPT OF PARKS&RECREATION	VAL VERDE CO. PARK SWIM POOL	4A190107086	12	7
4	LA CO SANITATION DISTRICTS	SAN JOSE CREEK WWRP	4B190107020	12	0
4	LA CO SANITATION DISTRICTS	JWPCP, CARSON	4B190107013	11	11
4	COLTEC INDUSTRIES INC.	FORMER MENASCO AEROSYSTEM FACI	4B191318001	9	8
4	FAIRCHILD HOLDING CORP.	FAIRCHILD FASTENERS SCREWCORP	4B196800017	9	9
4	GOLDEN WEST REFINING CO.	SANTA FE SPRINGS REFINERY	4B192162001	9	9
4	LACNTY. FAIRHOTEL&EXPO COMPLEX	FAIRPLEX	4B190144001	9	0
4	LOS ANGELES CITY OF DWP	HARBOR GENERATING STATION	4B193500004	9	9
4	LOS ANGELES CITY OF DWP	TANK E AREA, HAYNES PLT, LB	4B190106049	9	4
4	CONOCOPHILLIPS COMPANY	LA REFINERY, CARSON PLANT	4B192131026	8	0
4	HITCO CARBON COMPOSITES, INC.	HITCO/DEFENSE PROD DIV,	4B192128001	8	8
4	LB/L-SUNCAL MANDALAY, LLC	WESTPORT AT MANDALAY BAY	4A562445001	8	0
4	LOS ANGELES CITY OF DWP	TANK A,B,C,D AREA, HAYNES PL, LB	4B190106007	8	0
4	RSM LLC	RSM LLC	4B191297001	8	0
4	CHANNEL ISLAND MARINE RESOURCE	CHANNEL ISLAND MARINE RESOURCE	4B191309001	7	0
4	LA CO SANITATION DISTRICTS	SAUGUS WWRP	4A190107021	7	0
4	ANACAPA MARINE SERVICES	ANACAPA MARINE SERVICES	4A562442001	6	6
4	LOS ANGELES CITY OF DWP	OLYMPIC TANK FARM SKIM POND	4B190106051	6	0

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4	PARAMOUNT PETROLEUM CORP.	PARAMOUNT REFINERY	4B192348001	6	0
4	ULTRAMAR INC.	MARINE TERM, BERTH 164	4B192023002	6	0
4	AES ALAMITOS, L.L.C.	ALAMITOS GENERATING STATION	4B192111006	5	0
4	DIAL CORP, THE	SOUTHWEST GREASE BUSINESS	4B192545001	5	0
4	LAS VIRGENES MWD	TAPIA WRF	4B190104004	5	0
4	LOS ANGELES CITY OF DWP	TANK H, J AREA, HAYNES PLT. LB	4B190106042	5	1
4	HONEYWELL INC.	HONEYWELL INC.	4B191263001	4	0
4	LA CO SANITATION DISTRICTS	LOS COYOTES WWRP	4B190107015	4	0
4	LA CO SANITATION DISTRICTS	WHITTIER NARROWS WWRP	4B190107016	4	0
4	LOS ANGELES CITY OF DWP	TUNNEL # 105	4B190106099	4	4
4	PLASKOLITE WEST, INC.	PLASKOLITE WEST INC.	4B192533001	4	0
4	TIDELANDS OIL PRODUCTION CO.	WILMINGTON AND TERMINAL ISLAND	4B192023001	4	0
4	3M COMPANY	3M PHARMACEUTICALS	4B192594001	3	0
4	BP WILMINGTON CALCINER	BP WILMINGTON PLANT	4B192208003	3	2
4	CONSOLIDATED DRUM RECONDITION	OIL DRUM RECYCLING, SOUTH GATE	4B192178001	3	0
4	EL SEGUNDO POWER, L.L.C.	EL SEGUNDO GENERATING STATION	4B192111001	3	0
4	HR TEXTRON INC.	VALENCIA FACILITY	4A192332001	3	1
4	KOREAN WORLD TOWER	LOS ANGELES APARTMENT BLDG	4B191019001	3	0
4	LA CITY BUREAU OF SANITATION	TERMINAL ISLAND WWTP	4B190106005	3	0
4	LA CITY BUREAU OF SANITATION	TILLMAN WWRP	4B190106004	3	0
4	LONG BEACH GENERATION LLC	LONG BEACH GENERATING STATION	4B192111002	3	0
4	LOS ANGELES CITY OF DWP	TANK F,G AREA,HAYNES PLT, LB	4B190106050	3	0
4	METROPOLITAN WATER DIST. OF SC	FOOTHILL FEEDER POWER PLANT	4A190115006	3	0
4	NORTHROP GRUMMAN SP & MSN INC.	SPACE PARK FACILITY	4B192557003	3	3
4	PASADENA, CITY OF	DEPT. OF WATER & POWER	4B190138001	3	3
4	PNEUMO ABEX AEROSPACE, INC.	PNEUMO ABEX AEROSPACE CORP.	4A561058001	3	2
4	REDMAN EQUIPMENT & MFG CO	REDMAN EQUIPMENT & MFG CO	4B192090001	3	3
4	SHELL OIL PRODUCTS US	MORMON ISLAND MARINE TERMINAL	4B192108009	3	3
4	AVALON, CITY OF	AVALON WWTF	4B190100001	2	0
4	CALIFORNIA DAIRIES INC.	CALIFORNIA DAIRIES INC.	4B192454001	2	0
4	CONOCOPHILLIPS COMPANY	LOS ANGELES LUB. PLANT	4B192131013	2	0
4	DEPT OF WATER RESOURCES	WILLIAM E. WARNE POWER PLANT	4A190805002	2	0
4	EXXONMOBIL OIL CORPORATION	MOBIL SS#18-LDM	4B192079026	2	0
4	FAIRCHILD HOLDING CORP.	VOI-SHAN REDONDO BEACH	4B192525001	2	0
4	KEYSOR-CENTURY CORP	PVC-PVA COPOLYMER MFG, SAUGUS	4A192000001	2	0
4	MOBIL OIL CORP.	TORRANCE REFINERY	4B192079002	2	0
4	PLATINUM PARADIGM PROPERTIES	NORTH CRESCENT REALTY V, LLC	4B191112001	2	0
4	PORT OF LOS ANGELES	NEW DOCK ST PUMP STATION	4B191310001	2	0
4	SHELL OIL PRODUCTS US	L.A. REFINING CO. (WILMINGTON)	4B192121001	2	0
4	UNITED STATES BORAX & CHEM COR	WILMINGTON PLANT	4B192129002	2	0
4	1801 AVENUE OF THE STARS LP	OFFICE BUILDING	4B191067001	1	0

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4	BP WEST COAST PRODUCTS LLC	CARSON REFINERY	4B192010008	1	0
4	BP WEST COAST PRODUCTS LLC	HATHAWAY TERMINAL TANK FARM	4B192187001	1	0
4	BP WEST COAST PRODUCTS LLC	MARINE TERMINAL 1,BERTH 121,LB	4B192010015	1	1
4	CULLIGAN INDUSTRIAL WATER TREA	PURETEC HARRIS IND. WATER	4A562432001	1	0
4	DAYTON SUPERIOR SPECIALTY CHEM	EDOCO	4B192034001	1	0
4	EXXONMOBIL OIL CORPORATION	SOUTHWESTERN TERMINAL-AREA I	4B192079001	1	1
4	KINDER MORGAN (FORMER GATX)	LOS ANGELES HARBOR TERMINAL	4B192238001	1	0
4	L. FLYNT, LTD.	GREAT WESTERN SAVINGS CENTER	4B191093001	1	0
4	LA CITY BUREAU OF SANITATION	HYPERION WWTP	4B190106002	1	0
4	LONG BEACH UNIFIED SCHOOL DIST	MILLIKAN HIGH SCH NATATORIUM	4B190120001	1	0
4	LOS ANGELES CITY OF DWP	HARBOR G.S. - MARINE TANK FARM	4B190106046	1	0
4	LOS ANGELES CITY OF DWP	TUNNEL NO. 104	4B190106061	1	0
4	PACIFIC REFINING CO.	FORMER WESTERN FUEL OIL	4B191311001	1	0
4	RELIANT ENERGY MANDALAY, LLC	MANDALAY GENERATING STATION	4A562019001	1	1
4	RELIANT ENERGY MANDALAY, LLC	ORMOND BEACH GENERATING STN	4A562019002	1	1
4	SANTA MONICA, CITY OF	SANTA MONICA WATER TRT. PLANT	4B190122001	1	1
4	SHORE TERMINAL LLC	WILMINGTON MARINE TERMINAL	4B192263001	1	0
4	SOUTHERN CALIFORNIA EDISON CO.	PEBBLY BEACH DESALINATION PLT	4B192111010	1	0
4	TELEFLEX INC.	THE TALLEY SITE, NEWBURY PARK	4A562397002	1	0
4	TRW INC.	HAWTHORNE SITE	4B192557002	1	0
4	U.S. GYPSUM CO.	U.S. GYPSUM CO.	4B191287001	1	0
4	VOPAK TERMINAL LONG BEACH INC	VOPAK TERMINAL LONG BEACH INC.	4B192614001	1	1
Total				2622	1595

5F	MALAGA CWD	WWTF	5D100124001	364	0
5F	CALIFORNIA DAIRIES, INC	TIPTON MILK & BUTTER PROC FAC	5D541067001	122	0
5F	PLANADA CSD	WWTF	5C240110001	86	86
5F	VALLEY WASTE DISPOSAL CO	CAWEL0 RESERVOIR B	5D152013001	56	0
5F	ATWATER, CITY OF	WWTF	5C240100001	23	23
5F	VALLEY GOLD, LLC	GUSTINE CHEESE PRC FACILITY	5C242033002	18	0
5F	SOUTHERN CALIF EDISON CO	BIG CREEK POWERHOUSE NO 1	5C102009001	10	0
5F	PLIANT CORPORATION	VITAFILM PLANT	5C242008001	8	0
5F	ROCKWELL INTERNATIONAL	ROCKWELL INTERNATIONAL C/O GEO	5D542095001	6	0
5F	TAFT, CITY OF	CITY OF TAFT WWTF	5D150115001	3	0
5F	CA DEPT OF FORESTRY	MTN HOME CONSERVATION CAMP	5D540800001	2	0
5F	CALMAT OF CENTRAL CALIF	SANGER PLANT	5D102010001	2	0
5F	MARIPOSA PUD	WWTP	5C221012001	2	0
5F	CALIFORNIA DAIRIES, INC	LOS BANOS FOODS, INC	5C245017001	1	0

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5F	GRIFFIN RESOURCES	MOUNT POSO, POSCAL PAC VILLARD	5D152028001	1	0
			Total	704	109

5S	LIVE OAK, CITY OF	CITY OF LIVE OAK WWTP	5A510100001	293	293
5S	BRENTWOOD, CITY OF	BRENTWOOD WWTP	5B070101001	94	94
5S	GRASS VALLEY, CITY OF	GRASS VALLEY, CITY OF STP	5A290100001	78	0
5S	DISCOVERY BAY CSD	DISCOVERY BAY TRMT PLANT	5B070105003	73	70
5S	MANTECA, CITY OF	MANTECA WW QUALITY CONTROL FAC	5B390104001	66	27
5S	PLACERVILLE, CITY OF	HANGTOWN CREEK WWTP	5A090100001	61	3
5S	CONAGRA GROCERY PRODUCTS CO	CONAGRA OAKDALE FACILITY	5C502023001	60	51
5S	NEVADA CO SD #1	LAKE OF THE PINES WWTP	5A290104003	46	0
5S	DEUEL VOCATIONAL INSTITUTE	DEUEL VOCATNL INST. STP	5B390100001	40	40
5S	TURLOCK, CITY OF	TURLOCK WWTP	5C500108001	36	0
5S	NEVADA CO SD #1	LAKE WILDWOOD WWTP	5A290104001	34	0
5S	CA DEPT OF CORRECTIONS-JAMESTO	SIERRA CONSERVATION CTR-WTP	5C550801002	30	0
5S	VACAVILLE, CITY OF	EASTERLY STP	5A480105002	30	28
5S	WOODLAND, CITY OF - DOMESTIC	WOODLAND WWTP	5A570105001	30	0
5S	COLFAX, CITY OF	COLFAX STP	5A310101001	27	27
5S	EL DORADO ID	HYDRO ELECTRIC PROJ (FERC 184)	5A09NP00004	27	0
5S	NEVADA CO SD #1	CASCADE SHORES WWTP	5A290107002	23	0
5S	DAVIS, CITY OF	DAVIS STP	5A570100001	22	0
5S	MODESTO, CITY OF	GRAYSON PARK WELL NO.295	5C500117001	19	19
5S	GALT, CITY OF	GALT SD	5B340101001	18	0
5S	WILLOWS, CITY OF	WILLOWS WWTP	5A110101001	18	0
5S	PLACER CO FACILITY SERVICES	SA NO 28, ZONE NO.6	5A310104011	17	0
5S	COLUSA, CITY OF	COLUSA WWTP	5A060101001	16	12
5S	CA DEPT OF GENERAL SERVICES J	CENTRAL HEATING/COOLING FAC	5A340802001	15	15
5S	RIO VISTA, CITY OF	RIO VISTA WASTE TRT FACILITY	5A480104001	15	15
5S	CA DEPT OF FISH & GAME	NIMBUS HATCHERY	5A340801001	11	7
5S	GAYLORD CONTAINER CORPORATION	ANTIOCH PULP & PAPER MILL	5B072039001	10	2
5S	RIO VISTA, CITY OF	TRILOGY WWTP/NORTHWEST WWTP	5A480108001	9	4
5S	SEVEN CROWN RESORTS, INC.	PARADISE POINT MARINA	5B391041001	9	0
5S	UC DAVIS	UC DAVIS MAIN STP	5A570800001	9	5
5S	PROCTER AND GAMBLE COMPANY	PROCTER & GAMBLE CO WWTP	5A342004001	8	0
5S	SACRAMENTO REGIONAL CSD-SACTO	SACRAMENTO REGIONAL WWTP	5A340108002	8	0
5S	SACRAMENTO COGENERATION AUTH	SACRAMENTO COGEN AUTH PROJECT	5A342041001	7	0
5S	TEICHERT AGGREGATES	SETTLING POND DISCHARGE	5A347001001	7	6
5S	BROWN SAND, INC.	MANTECA AGGREGATE SAND PLANT	5B392082001	6	0

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5S	HUNT-WESSON, INC.	HUNT-WESSON, INC.	5A572002001	6	6
5S	LODI, CITY OF	WHITE SLOUGH WATER POLL CON PU	5B390103002	6	2
5S	MAXWELL P.U.D.	MAXWELL PUD WWTF	5A060102001	6	6
5S	CALIF AMMONIA COMPANY	CALAMCO - STOCKTON TERMINAL	5B392095001	5	0
5S	GWF POWER SYSTEMS, L.P.	GWF POWER SYSTEMS, SITE IV	5B072050003	5	5
5S	PLACER CO FACILITY SERVICES	PLACER CO SMD NO 1	5A310104007	5	4
5S	CA DEPT OF GENERAL SERVICES J	STATE PRINTING & WAREHOUSES	5A340805001	4	0
5S	TRACY, CITY OF	TRACY STP	5B390108001	4	3
5S	AUBURN, CITY OF	AUBURN WWTP	5A310100001	3	0
5S	ROSEVILLE, CITY OF	DRY CREEK WWTP	5A310106001	3	3
5S	WEST SACRAMENTO, CITY OF	WEST SACRAMENTO STP	5B570103001	3	2
5S	WILLIAMS, CITY OF	WILLIAMS WWTP	5A060103001	3	0
5S	MIRANT DELTA LLC	CONTRA COSTA POWER PLT ANTIOCH	5B072014008	2	0
5S	SACRAMENTO CO AIRPORT SYSTEM	SACRAMENTO INTERNATIONAL AIRPT	5A34NP00004	2	0
5S	CA DEPT OF FISH & GAME	MOKELUMNE RIVER FISH HATCHERY	5B390800001	1	0
5S	EAST BAY MUD	CAMANCHE DAM POWER HOUSE	5B390114001	1	1
5S	LINDA CO WATER DISTRICT	LINDA CO WTR DIST WPCP	5A580100002	1	0
5S	MODESTO ID	MODESTO ID REGIONAL WTP	5C500114003	1	0
5S	MODESTO, CITY OF	MODESTO WATER QUALITY CTRL FAC	5C500102001	1	0
5S	OLIVEHURST PUD	OLIVEHURST WWTP	5A580102001	1	0
5S	SACRAMENTO CO DPW-GOETHE RD	KIEFER LANDFILL GW TREATMENT	5A340311002	1	1
5S	SACRAMENTO REGIONAL CSD-ELK GV	WALNUT GROVE WWTP (CSD1)	5A340107010	1	0
5S	SAN JOAQUIN CO DPW	CSA 31 - FLAG CITY	5B390115001	1	0
5S	SMUD	RANCHO SECO NUCLEAR GEN STA 1	5A342008001	1	0
5S	SMUD	SMUD COGENERATION PLANT	5A342008003	1	0
5S	STOCKTON, CITY OF	IVANO LANE	5B39NP00034	1	1
Total				1341	752

5R	BIGGS, CITY OF	BIGGS WWTP	5A040100001	31	0
5R	CHICO, CITY OF	WATER POLLUTION CONTROL PLANT	5A040102001	11	10
5R	MINING REMEDIAL RECOVERY CO	MAMMOTH, SUTRO, KEYSTONE ET AL	5A459006001	10	0
5R	MILLENNIUM HOLDINGS LLC	BULLY HILL & RISING STAR MINES	5A459002001	6	0
5R	QUINCY CSD	QUINCY WWTP & COLLECTION SYSTM	5A320103001	6	4
5R	COLLINS PINE COMPANY	CHESTER SAWMILL	5A322000001	4	2
5R	RED BLUFF, CITY OF	RED BLUFF WW RECLAMATION PLANT	5A520101001	4	4
5R	SIERRA PACIFIC INDUSTRIES	SIERRA PACIFIC, QUINCY DIV	5A321016001	4	3
5R	HOLLY TREE RANCH DEVELOPMENT	GREENHORN MINE	5A459010001	3	0
5R	LEHIGH SOUTHWEST CEMENT CO	LEHIGH SOUTHWEST CEMENT CO	5A452008001	2	0
5R	REDDING, CITY OF	CLEAR CREEK WWTP	5A450103001	2	1

Water Board	Agency Name	Facility Name	WDID	MMP Violations (Includes both confirmed and alleged MMP violations)	Violations Receiving Penalty (Does not include pending Penalties)
5R	ANDERSON, CITY OF	ANDERSON WPCP	5A450100001	1	1
5R	SHASTA LAKE, CITY OF	SHASTA LAKE WWTF	5A450105001	1	0
			Total	85	25

6A	SUSANVILLE CSD	SUSANVILLE CSD	6A181554001	4	0
			Total	4	0

7	COACHELLA SANITARY DISTRICT	COACHELLA SD - NPDES 00-032	7A330104012	172	166
7	CALIPATRIA, CITY OF	CALIPATRIA - NPDES 00-002	7A130102041	57	20
7	SEELEY COUNTY WATER DISTRICT	SEELEY CWD WWTP 02-126	7A130111013	50	9
7	BRAWLEY, CITY OF	BRAWLEY WWTP-NPDES 00-087	7A130100011	32	28
7	IMPERIAL, CITY OF	IMPERIAL WPCP 00-040	7A130106011	26	25
7	COACHELLA SANITARY DISTRICT	COACHELLA SD #2 NPDES	7A330104004	19	19
7	CA DEPT OF CORRECTIONS	CENTINELA STATE PRISON 03-096	7A131337001	18	17
7	WESTMORLAND, CITY OF	WESTMORLAND WWTP 02-004	7A130112012	13	7
7	DATE GARDEN MHP	DATE GARDEN MHP 03-054	7A131057011	12	0
7	BFD ASSET/COUNTRY MHRPV ASSET	COUNTRY LIFE RV & MHP 03-053	7A131001011	9	0
7	NILAND SANITARY DISTRICT	NILAND STP 03-049	7A130109011	7	0
7	MCCABE UNION SCHOOL DISTRICT	MCCABE UNION SCHOOL 02-001	7A130114011	6	5
7	EL CENTRO, CITY OF	EL CENTRO MWWTP 04-004	7A130103011	5	0
7	IMPERIAL COMMUN. COLLEGE DIST	IMP COMM COLLEGE WTP 04-084	7A130113011	4	3
7	VALLEY SANITARY DISTRICT	VALLEY SD STP - NPDES 00-010	7A330122021	4	2
7	HOLTVILLE, CITY OF	HOLTVILLE WWTP 01-002	7A130105011	3	0
7	ORMAT NEVADA, INC.	COVANTA HEBER GEOTH. 00-072	7A132160001	2	0
7	ORMAT NEVADA, INC.	COVANTA SECOND IMP GEO 00-001	7A132210001	1	0
			Total	440	301

8	YUCAIPA VALLEY WATER DISTRICT	STP	8 362222001	244	244
8	CORONA, CITY OF	STP NO. 1	8 330108001	110	104
8	WESTERN RIVERSIDE CO. RWA	STP, NORCO	8 332353001	106	104
8	RIALTO, CITY OF	STP	8 360112001	57	57
8	COLTON/SAN BERNARDINO RTT&WRA	STP, RIX	8 362375001	50	49
8	CALIFORNIA STEEL INDUSTRIES	STORM, MULBERRY DITCH & SAN SEV	8 362023002	24	8
8	EASTERN MUNICIPAL WATER DIST.	STP, LIVE STREAM-ALL PLANTS	8 332303001	18	18
8	INLAND EMPIRE UTILITIES AGENCY	STP NO 1,ONTARIO-UPLAND	8 360104004	18	16
8	IRVINE RANCH WATER DISTRICT	DEWATERING, GENERAL	8 302006009	18	0
8	INTERNATIONAL BAY CLUBS, INC.	DEWATERING, BALBOA BAY CLUB	8 303232001	16	16

Water Board	Agency Name	Facility Name	WDID	MMP Violations (Includes both confirmed and alleged MMP violations)	Violations Receiving Penalty (Does not include pending Penalties)
8	MOUNTAINVIEW POWER CO., LLC	GENERATING STATION, SAN BERDO	8 362036003	6	6
8	INLAND EMPIRE UTILITIES AGENCY	STP NO 2,CHINO	8 360104001	5	3
8	IRVINE COMPANY	DEWATERING, GENERAL	8 302448001	3	0
8	IRVINE RANCH WATER DISTRICT	STP	8 302006002	3	3
8	SAN BERNARDINO, CITY OF-WATER	STP, SAN BERNARDINO	8 360114003	3	0
8	ADAMS STEEL	STORM, ANAHEIM	8 302741001	1	1
8	AES HUNTINGTON BEACH, L.L.C.	GENERATING STATION, HUNT BEACH	8 302015004	1	0
8	ARIZONA PIPELINE CO.	DEWATERING, BALBOA ISLAND	8 303314001	1	0
8	CORONA, CITY OF	STP NO. 3	8 332476001	1	0
8	HAAGEN COMPANY, LLC	GW CLEANUP-H.B., EDINGER	8 303335001	1	1
8	INLAND EMPIRE UTILITIES AGENCY	STP, CARBON CANYON	8 362283001	1	1
			Total	687	631
9	ESCONDIDO, CITY OF	HARRF DISCH TO SAN ELIJO OO	9 000000031	316	317
9	FALLBROOK PUBLIC UTILITY DIST	FALLBROOK PUD, OCEANSIDE OCN OF	9 000000115	30	29
9	RANCHO CALIFORNIA WATER DIST	SANTA ROSA WRF-MUR CK DIS-HIST	9 000000601	25	25
9	OCEANSIDE, CITY OF, WTR UTIL DEP	OCEANSIDE OCEAN OUTFALL	9 000000146	14	14
9	SEA WORLD, INC	SEA WORLD, SAN DIEGO	9 000000083	9	9
9	SAN ELIJO JOINT POWERS AUTH	SAN ELIJO WPCF	9 000000125	3	3
9	SOUTHERN CALIFORNIA EDISON	SONGS UNIT 1	9 000000086	3	3
9	ENCINA WASTEWATER AUTHORITY	ENCINA OCEAN OUTFALL	9 000000030	2	2
9	MISSION LINEN ENGINEERING	MISSION LINEN SUPPLY	9 000000020	2	2
9	SOCWA-SAN JUAN CREEK OCEAN O/F	SOCWA SAN JUAN CREEK OCEAN O/F	9 000000175	2	2
9	SOUTHWEST MARINE, INC	SOUTHWEST MARINE SHIPYARD	9 000000137	1	1
			Total	407	407

GRAND TOTAL: 8426 5047
TOTAL # OF FACILITIES: 348
OF FACILITIES W/ ENFORCEMENT ACTION: 189
% OF FACILITIES W/ ENFORCEMENT ACTION: 54%