

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

In the Matter of:

ORDER R5-2024-0521

**CHESTER PUBLIC UTILITY DISTRICT  
CHESTER SEWAGE  
TREATMENT PLANT  
PLUMAS COUNTY**

**SETTLEMENT AGREEMENT AND  
STIPULATION FOR ENTRY OF  
ADMINISTRATIVE CIVIL LIABILITY  
ORDER**

**I. Introduction**

1. This Settlement Agreement and Stipulation for Entry of Administrative Civil Liability Order (Stipulated Order) is entered into by and between the Assistant Executive Officer of the California Regional Water Quality Control Board, Central Valley Region (Central Valley Water Board), on behalf of the Central Valley Water Board's Prosecution Team (Prosecution Team), and the Chester Public Utility District (Discharger) (collectively, Parties) and is presented to the Central Valley Water Board, or its delegee, for adoption as an order by settlement, pursuant to California Water Code section 13323 and Government Code section 11415.60.

**II. Recitals**

2. The Discharger owns and operates the Chester Sewage Treatment Plant (Facility), which provides sewerage service to approximately 2,100 residents of Plumas County. Treated municipal wastewater may be discharged to Lake Almanor, a water of the United States, from 1 October to 30 May. Outside this time frame, wastewater may be discharged to constructed wetlands.
3. On 18 February 2016, the Central Valley Water Board adopted WDRs Order R5-2016-0004 (NPDES No. CA0077747) to regulate the Facility discharge of treated municipal wastewater to surface water and the constructed wetlands.
4. On 15 September 2017, Central Valley Water Board staff issued the discharger a Notice of Violation (NOV) that included the effluent limitation violations in Attachment A. The NOV characterized some of the effluents limitation violations as subject to mandatory minimum penalties (MMPs) pursuant to Water Code section 13385, subdivisions (h) and (i).
5. On 26 February 2021, Central Valley Water Board staff issued the discharger a NOV that included the effluent limitation violations in Attachment A. The NOV characterized some of the effluent limitation violations as subject to MMPs pursuant to Water Code section 13385, subdivisions (h) and (i).

6. Water Code section 13385, subdivisions (h) and (i) require the assessment of MMPs as follows:

Water Code section 13385, subdivision (h)(1) states:

Notwithstanding any other provision of this division, and except as provided in subdivisions (j), (k), and (l), a mandatory minimum penalty of three thousand dollars (\$3,000) shall be assessed for each serious violation.

Water Code section 13385, subdivision (i)(1) states:

Notwithstanding any other provision of this division, and except as provided in subdivisions (j), (k), and (l), a mandatory minimum penalty of three thousand dollars (\$3,000) shall be assessed for each violation whenever the person does any of the following four or more times in any period of six consecutive months, except that the requirement to assess the mandatory minimum penalty shall not be applicable to the first three violations:

(A) Violates a waste discharge requirement effluent limitation.

(B) Fails to file a report pursuant to Section 13260.

(C) Files an incomplete report pursuant to Section 13260.

(D) Violates a toxicity effluent limitation contained in the applicable waste discharge requirements where the waste discharge requirements do not contain pollutant-specific effluent limitations for toxic pollutants.

7. According to the Discharger's self-monitoring reports (SMRs), and as identified in Table A of Attachment A, the Discharger committed three (3) serious violations, and eight (8) non-serious violations, of effluent limitations contained in WDRs Order R5-2016-0004 that are subject to MMPs. **The MMP amount for the alleged effluent limitation violations is thirty-three thousand dollars (\$33,000).**

8. Water Code section 13385, subdivision (k) states:

(1) In lieu of assessing all or a portion of the mandatory minimum penalties pursuant to subdivisions (h) and (i) against a publicly owned treatment works (POTW) serving a small community, the state board or the regional board may elect to require the publicly owned treatment works to spend an equivalent amount towards the completion of a compliance project

proposed by the publicly owned treatment works, if the state board or the regional board finds all of the following:

(A) The compliance project is designed to correct the violations within five years.

(B) The compliance project is in accordance with the enforcement policy of the state board, excluding any provision in the policy that is inconsistent with this section.

(C) The publicly owned treatment works has prepared a financing plan to complete the compliance project.

(2) For the purposes of this subdivision, “a publicly owned treatment works serving a small community” means a publicly owned treatment works serving a population of 10,000 persons or fewer or a rural county, with a financial hardship as determined by the state board after considering such factors as median income of the residents, rate of unemployment, or low population density in the service area of the publicly owned treatment works.

9. Under the State Water Resources Control Board’s Water Quality Enforcement Policy, “financial hardship” means that the community served by the POTW meets one of the following criteria:

A) Median household income for the community is less than 80 percent of the California median household income;

B) The community has an unemployment rate of 10 percent or greater, or;

C) Twenty percent of the population is below the poverty level.

10. The Central Valley Water Board finds that the Discharger is eligible for a Compliance Project because the Facility is a POTW serving a small community with a financial hardship. The Discharger serves a community with a population of approximately 2,187 and with a median household income (MHI) less than 80% of the statewide MHI according to the 2022 American Community Survey 5-Year Estimates.

11. The Discharger submitted a Compliance Project proposal to eliminate future effluent limitation violations. Additional information and requirements regarding the Compliance Project is contained in Attachment B, attached hereto and incorporated by reference.

12. The Parties have engaged in confidential settlement negotiations and agree to settle the matter without administrative or civil litigation by presenting this Stipulated Order to the Central Valley Water Board, or its delegee, for adoption as an order by settlement, pursuant to Water Code section 13323 and Government Code section 11415.60. To resolve the violations set forth in Attachment A, by consent and without further administrative proceedings, the Parties have agreed to the imposition of an administrative civil liability (ACL) in the amount of **thirty-three thousand dollars (\$33,000)** in MMPs against the Discharger.
13. The Central Valley Water Board's Prosecution Team believes that the resolution of the alleged violations is fair and reasonable and fulfills its enforcement objectives, that no further action is warranted concerning the violations alleged herein, and that this Stipulated Order is in the best interest of the public.

### III. Stipulations

The Parties stipulate to the following:

14. **Jurisdiction:** The Parties agree that the Central Valley Water Board has subject matter jurisdiction over the matters alleged in this action and personal jurisdiction of the Parties to this Stipulation.
15. **Administrative Civil Liability:**
  - A) The Discharger agrees to the imposition of an ACL in the amount of **thirty-three thousand dollars (\$33,000)** to resolve the violations alleged in Attachment A.
  - B) The Parties agree that the entire ACL amount of **thirty-three thousand dollars (\$33,000)** will be suspended pending completion of the Compliance Project described herein and Attachment B. This amount is also referred to as the Suspended Liability Amount.
16. **Description of Compliance Project:** The primary aim of the project is to tackle the "infiltration and inflow" (I&I) challenges faced by the Chester Public Utility District. Over the years, the district's collection system has deteriorated, allowing unwanted infiltration, particularly during wet winters, which has made it difficult to consistently meet discharge permit requirements for Lake Almanor. To address this, the project will employ targeted tools to effectively seal the collection system. Complete description for the Compliance Project is contained in Attachment B.
17. **Inspection Authority:** The Discharger agrees that Central Valley Water Board staff have permission to inspect the Compliance Project, including any

documents associated with implementation of the Compliance Project, at any time without notice.

18. **Compliance Project Budget:** The amount that the Discharger will expend on the Compliance Project is in excess of the MMPs that the Central Valley Water Board is required to assess under Water Code section 13385, subdivisions (h) and (i) for the violations listed in Attachment A. The Discharger has received grants, above and beyond the ACL amount described in Paragraph 16, to complete the Compliance Project.
19. **Compliance Project Schedule and Reporting Requirements:** The Discharger anticipates completing the Compliance Project within one year of the date of approval of this Stipulated Order (Compliance Project Completion Date). The Discharger shall submit the following reports to the Central Valley Water Board contact identified in Paragraph 24 below:
  - A) **Certification of Completion:** No later than the Compliance Project completion dates identified in Attachment B, a responsible official of the Discharger shall submit a final report and certified statement, signed under penalty of perjury, which documents that the Discharger completed the Compliance Project in accordance with the terms of this Stipulated Order, and documents the Discharger's expenditures to implement the Compliance Project. Documentation may include photographs, invoices, receipts, certifications, and other materials reasonably necessary for the Central Valley Water Board to evaluate completion of the Compliance Project and the costs incurred. The Discharger shall provide Central Valley Water Board staff with any additional information that is reasonably necessary to verify the Discharger's expenditures and certification of completion.
20. **Third Party Financial Audit of Compliance Projects:** If the Central Valley Water Board obtains information indicating that the Discharger has not expended money on the Compliance Project in the amount claimed, or has not adequately completed the Compliance Project, the Central Valley Water Board may require the Discharger to submit, at its sole costs, a written report prepared by an independent third party(ies) acceptable to the Central Valley Water Board, providing such party's(ies's) professional opinion that the Discharger has or has not expended money in the amounts claimed. The audit report shall be provided to the Central Valley Water Board within three (3) months of notice from the Central Valley Water Board to the Discharger of the need for an independent third-party audit. The audit need not address any costs incurred by the Central Valley Water Board for oversight.
21. **Compliance with Applicable Laws and Regulatory Changes:** The Discharger understands that payment of an ACL in accordance with the terms of this

Stipulated Order and/or compliance with the terms of this Stipulated Order is not a substitute for compliance with applicable laws, and that additional violations of the type alleged herein may subject it to further enforcement, including additional ACLs. Nothing in this Stipulated Order shall excuse the Discharger from meeting any more stringent requirements that may be imposed hereafter by changes in applicable and legally binding legislation or regulations.

**22. Failure to Complete Compliance Project:** If the Compliance Project is not fully implemented by the Compliance Project Completion Date described in Attachment B, the Discharger shall pay the entire Suspended Liability Amount associated with the Compliance Project (**\$33,000**). Payment shall be made to the State Water Pollution Cleanup and Abatement Account within 30 days of receipt of written notice from the Central Valley Water Board, or its delegee, that the Compliance Project has not been completed.

**23. Satisfaction of Order:** Under Water Code section 13385, subdivision (k)(1)(A), and the State Water Resources Control Board's Water Quality Enforcement Policy, a Compliance Project must be designed to correct the violations within five years. Upon the Discharger's satisfaction of its obligations under this Stipulated Order, completion of Compliance Project, and any audits the Executive Officer, or its delegee, will issue a "Satisfaction of Order." The Satisfaction of Order shall terminate any further obligations of the Discharger under this Stipulated Order and permanently suspend the Suspended Liability Amount associated with the Compliance Project.

**24. Party Contacts for Communications Related to Stipulated Order:**

FOR THE CENTRAL VALLEY WATER BOARD:

Stacy Gotham, Senior Water Resource Control Engineer  
NPDES Unit  
364 Knollcrest Drive, Suite 205  
Redding, CA 96002  
(530) 224-4993  
[Stacy.Gotham@waterboards.ca.gov](mailto:Stacy.Gotham@waterboards.ca.gov)

FOR THE DISCHARGER:

Adam Cox, General Manager  
Chester Public Utility District  
P.O. Box 503  
Chester, CA 96020  
(530) 258-2171  
[cpud@frontiernet.net](mailto:cpud@frontiernet.net)

25. **Attorney's Fees and Costs:** Except as otherwise provided herein, each Party shall bear all attorneys' fees and costs arising from the Party's own counsel in connection with the matters set forth herein.
26. **Public Notice:** The Discharger understands that this Stipulated Order will be noticed for a 30-day public review and comment period prior to consideration by the Central Valley Water Board, or its delegee. If significant new information is received that reasonably affects the propriety of presenting this Stipulated Order to the Central Valley Water Board, or its delegee, for adoption, the Assistant Executive Officer may unilaterally declare this Stipulated Order void and decide not to present it to the Central Valley Water Board, or its delegee. The Discharger agrees that it may not rescind or otherwise withdraw its approval of this proposed Stipulated Order.
27. **Addressing Objections Raised During Public Comment Period:** The Parties agree that the procedure contemplated for public review of this Stipulated Order and the Central Valley Water Board's, or its delegee's, adoption of this Stipulated Order is lawful and adequate. The Parties understand that the Central Valley Water Board, or its delegee, has the authority to require a public hearing on this Stipulated Order. In the event procedural objections are raised or a public hearing is required prior to the Stipulated Order becoming effective, the Parties agree to meet and confer concerning any such objections and may agree to revise or adjust the procedure and/or this Stipulated Order as necessary or advisable under the circumstances.
28. **No Waiver of Right to Enforce:** The failure of the Prosecution Team or Central Valley Water Board to enforce any provision of this Stipulated Order shall in no way be deemed a waiver of such provision, or in any way affect the validity of this Stipulated Order. The failure of the Prosecution Team or Central Valley Water Board to enforce any such provision shall not preclude it from later enforcing the same or any other provision of this Stipulated Order. No oral advice, guidance, suggestions, or comments by employees or officials of any Party regarding matters covered under this Stipulated Order shall be construed to relieve any Party regarding matters covered in this Stipulated Order. The Central Valley Water Board reserves all rights to take additional enforcement actions, including without limitation, the issuance of ACL complaints or orders for violations other than those addressed by this Stipulated Order.
29. **Effect of Stipulated Order:** Except as expressly provided in this Stipulated Order, nothing in this Stipulated Order is intended nor shall it be construed to preclude the Central Valley Water Board or any state agency, department, board or entity or any local agency from exercising its authority under any law, statute, or regulation.

30. **Interpretation:** This Stipulated Order shall not be construed against the party preparing it but shall be construed as if the Parties jointly prepared it and any uncertainty and ambiguity shall not be interpreted against any one party.
31. **Modification:** This Stipulated Order shall not be modified by any of the Parties by oral representation whether made before or after the execution of this Stipulated Order. All modifications must be made in writing and approved by the Central Valley Water Board or its delegee.
32. **Integration:** This Stipulated Order constitutes the entire agreement between the Parties and may not be amended or supplemented except as provided for in this Stipulated Order.
33. **If Order Does Not Take Effect:** In the event that this Stipulated Order does not take effect because it is not approved by the Central Valley Water Board, or its delegee, or is vacated in whole or in part by the State Water Board or a court, the Parties acknowledge that the Prosecution Team may proceed to a contested evidentiary hearing before the Central Valley Water Board to determine whether to assess an ACL for the underlying alleged violations, or may continue to pursue settlement. The Parties agree that all oral and written statements and agreements made during the course of settlement discussions will not be admissible as evidence in any subsequent administrative or judicial proceeding or hearing and will be fully protected by California Evidence Code sections 1152 and 1154; California Government Code section 11415.60; Rule 408, Federal Rules of Evidence; and any other applicable privilege under federal and/or state law. The Parties also agree to waive any and all objections related to their efforts to settle this matter, including, but not limited to:
- A) Objections related to prejudice or bias of any of the Central Valley Water Board members or their advisors and any other objections to the extent that they are premised in whole or in part on the fact that the Central Valley Water Board members or their advisors were exposed to some of the material facts and the Parties settlement positions, and therefore may have formed impressions or conclusions, prior to conducting any contested evidentiary hearing in this matter; or
  - B) Laches or delay or other equitable defenses based on the time period that the Order or decision by settlement may be subject to administrative or judicial review.
34. **Waiver of Hearing:** The Discharger has been informed of the rights provided by Water Code section 13323, subdivision (b), and hereby waives its right to a hearing before the Central Valley Water Board.

35. **Waiver of Right to Petition:** The Discharger hereby waives the right to petition the Central Valley Water Board's adoption of the Stipulated Order as written for review by the State Water Resources Control Board, and further waives the right, if any, to appeal the same to a California Superior Court and/or any California appellate level court.
36. **Covenant Not to Sue:** Upon the effective date of this Stipulated Order, the Discharger shall and does release, discharge, and covenant not to sue or pursue any civil or administrative claims against any State Agency or the State of California, its officers, agents, directors, employees, attorneys, representatives, for any and all claims or cause of action, which arise out of or are related to this action.
37. **Central Valley Water Board is Not Liable:** Neither the Central Valley Water Board members, nor the Central Valley Water Board staff, attorneys, or representatives shall be liable for any injury or damage to persons or property resulting from the negligent or intentional acts or omissions by the Discharger or its respective directors, officers, employees, agents, representatives, or contractors in carrying out activities pursuant to this Stipulated Order, nor shall the Central Valley Water Board, its members, staff, attorneys, or representatives be held as parties to or guarantors of any contract entered into by the Discharger, or its directors, officers, employees, agents, representatives, or contractors in carrying out activities pursuant to this Stipulated Order.
38. **Authority to Bind:** Each person executing this Stipulated Order in a representative capacity represents and warrants that he or she is authorized to execute this Stipulated Order on behalf of and to bind the entity on whose behalf he or she executes the Stipulated Order.
39. **Necessity for Written Approvals:** All approvals and decisions of the Central Valley Water Board under the terms of this Stipulated Order shall be communicated to the Discharger in writing. No oral advice, guidance, suggestions, or comments by employees or officials of the Central Valley Water Board regarding submissions or notices shall be construed to relieve the Discharger of its obligation to obtain any final written approval required by this Stipulated Order.
40. **No Third Party Beneficiaries:** This Stipulated Order is not intended to confer any rights or obligation on any third party or parties, and no third party or parties shall have any right of action under this Stipulated Order for any cause whatsoever.
41. **Severability:** This Stipulated Order is severable; should any provision be found invalid the remainder shall remain in full force and effect.

42. **Effective Date:** This Stipulated Order shall be effective and binding on the Parties upon the date the Central Valley Water Board, or its delegee, enters the Order.
43. **Counterpart Signatures:** This Stipulated Order may be executed and delivered in any number of counterparts, each of which when executed and delivered shall be deemed to be an original, but such counterparts shall together constitute one document.

Stipulated Administrative Civil Liability Order R5-2024-0521  
Chester Public Utility District  
Chester Sewage Treatment Plant  
Plumas County

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**IT IS SO STIPULATED.**

California Regional Water Quality Control Board Prosecution Team  
Central Valley Region

By: Original signed by Clint E. Snyder  
Clint E. Snyder, P.G.  
Assistant Executive Officer

22 August 2024  
Date

Chester Public Utility District

By: Original signed by Adam Cox  
Adam Cox  
General Manager

4 September 2024  
Date

**HAVING CONSIDERED THE PARTIES STIPULATIONS, THE CENTRAL VALLEY REGIONAL WATER QUALITY CONTROL BOARD, BY AND THROUGH ITS EXECUTIVE OFFICER, FINDS THAT:**

1. The foregoing Stipulation is fully incorporated herein and made part of this Order.
2. This is an action to enforce the laws and regulations administered by the Central Valley Water Board. The Central Valley Water Board finds that issuance of this Order is exempt from the provisions of the California Environmental Quality Act (Public Resources Code, sections 21000 et seq.), in accordance with section 15321, subdivision (a)(2), Title 14, of the California Code of Regulations.
3. The Executive Officer of the Central Valley Water Board is authorized to refer this matter directly to the Attorney General for enforcement if the Discharger fails to perform any of its obligations under this Order.

Pursuant to Water Code section 13323 and Government Code section 11415.60, **IT IS HEREBY ORDERED** on behalf of the California Regional Water Quality Control Board, Central Valley Region.

*Original signed by 21 October 2024*

Patrick Pulupa, Executive Officer

Attachments (2):

Attachment A: Record of Violations for Assessing Mandatory Minimum Penalties

Attachment B: Compliance Project Description

**R5-2024-0521 - ATTACHMENT A  
RECORD OF VIOLATIONS FOR ASSESSING MANDATORY MINIMUM PENALTIES**

**Chester Public Utility District  
Chester Wastewater Treatment Plant**

RECORD OF VIOLATIONS (8 February 2017 – 31 May 2020) MANDATORY MINIMUM PENALTIES  
(Data reported under Monitoring and Reporting Program R5-2016-0004)

The following table lists the alleged violations, including those subject to mandatory minimum penalties (MMPs) pursuant to Water Code section 13385, subdivisions (h) and (i).

**Table A – Effluent Limitation Violations subject to Mandatory Minimum Penalties**

<b>Item</b>	<b>Violation Date</b>	<b>Parameter</b>	<b>Units</b>	<b>Condition</b>	<b>Limit</b>	<b>Measured</b>	<b>Violation Type</b>	<b>MMP Type</b>	<b>CIWQS</b>	<b>MMP Amount</b>
1	02/21/2017	Total Coliform	MPN/100 mL	7-day Median	23	33	OEV	NCHRON	1030464	\$0
2	03/13/2017	pH	standard units	Instantaneous Maximum	9	9.3	OEV	NCHRON	1030462	\$0
3	04/05/2017	Total Coliform	MPN/100 mL	7-day Median	23	240	OEV	NCHRON	1030546	\$0
4	04/12/2017	Total Coliform	MPN/100 mL	7-day Median	23	170	OEV	CHRON	1030549	3,000
5	04/26/2017	Total Coliform	MPN/100 mL	7-day Median	23	>1600	OEV	CHRON	1030551	3,000
6	2/28/2019	Biochemical Oxygen Demand (5-day @ 20° C)	mg/L	% Removal	85	54	CAT 1	NCHRON	1062912	\$0
7	2/28/2019	Total Suspended Solids	mg/L	% Removal	85	40	CAT 1	SIG	1062914	\$3,000

**R5-2024-0521 - ATTACHMENT A**  
**RECORD OF VIOLATIONS FOR ASSESSING MANDATORY MINIMUM PENALTIES**

Item	Violation Date	Parameter	Units	Condition	Limit	Measured	Violation Type	MMP Type	CIWQS	MMP Amount
8	3/31/2019	Biochemical Oxygen Demand (5-day @ 20° C)	mg/L	% Removal	85	74	CAT 1	NCHRON	1062957	\$0
9	3/31/2019	Total Suspended Solids	mg/L	% Removal	85	51	CAT 1	SIG	1062958	\$3,000
10	4/30/2019	Biochemical Oxygen Demand (5-day @ 20° C)	mg/L	% Removal	85	76	CAT 1	CHRON	1062964	\$3,000
11	4/30/2019	Total Suspended Solids	mg/L	% Removal	85	73	CAT 1	CHRON	1062971	\$3,000
12	5/1/2019	Total Coliform	MPN/100mL	7-day Median	23	33	OEV	CHRON	1078245	\$3,000
13	5/8/2019	Total Coliform	MPN/100mL	7-day Median	23	70	OEV	CHRON	1078246	\$3,000
14	5/15/2019	Total Coliform	MPN/100mL	7-day Median	23	46	OEV	CHRON	1078247	\$3,000
15	5/31/2019	Biochemical Oxygen Demand (5-day @ 20° C)	mg/L	% Removal	85	71	CAT 1	CHRON	1064557	\$3,000
16	5/31/2019	Total Suspended Solids	mg/L	% Removal	85	49	CAT 1	SIG	1064560	\$3,000
									<b>Total</b>	<b>\$33,000</b>

Notes:

1. Serious Group I: any waste discharge that exceeds the effluent limitations for a group I pollutant by 40% or more.
2. Serious Group II: any waste discharge that exceeds the effluent limitations for a group II pollutant by 20% or more.

**R5-2024-0521 - ATTACHMENT A**  
**RECORD OF VIOLATIONS FOR ASSESSING MANDATORY MINIMUM PENALTIES**

3. Non-Serious Violation: A non-serious violation will be subject to MMPs if the discharger does any one of the following four or more times in any period of 180 days:
- (a) violates a WDR effluent limitation;
  - (b) fails to file a report of waste discharge pursuant to California Water Code section 13260;
  - (c) files an incomplete report of waste discharge pursuant to California Water Code section 13260;

**PAYMENT AMOUNT VIOLATIONS SUMMARY:**

<b><u>VIOLATIONS AS OF:</u></b>	<b><u>8 February 2017 – 31 May 2020</u></b>
Group I Violations Assessed MMP:	6
Group II Violations Assessed MMP:	0
<u>OEV Violations Subject to MMPs:</u>	<u>5</u>
<b>Total Violations Subject to MMPs:</b>	<b>11</b>

**Mandatory Minimum Penalty Amount for Effluent Limit Violation(s)**

Mandatory Minimum Penalty = (3 Serious Violations + 8 Non-Serious Violations) x \$3,000 = \$33,000

**Total Mandatory Minimum Penalty = \$33,000**

**R5-2024-0521 - ATTACHMENT A**  
**RECORD OF VIOLATIONS FOR ASSESSING MANDATORY MINIMUM PENALTIES**

**Table B - Definitions**

<b>Abbreviation</b>	<b>Description</b>
CAT 1	Violation of effluent limitation for Group 1 pollutant.
CAT 2	Violation of effluent limitation for Group 2 pollutant.
CHRON	Chronic violation as defined by Water Code section 13385(i). To be counted as a chronic violation, there must be 3 preceding violations (serious or non-serious) within a 180-day period. The fourth and any subsequent non-serious violation that occurs within the 180-day period is an MMP violation.
CIWQS	<a href="https://www.waterboards.ca.gov/water_issues/programs/ciwqs/">California Integrated Water Quality System</a> ( <a href="https://www.waterboards.ca.gov/water_issues/programs/ciwqs/">https://www.waterboards.ca.gov/water_issues/programs/ciwqs/</a> )
Measured	Reported value for the monitoring period by the Discharger.
MMP Type	Classification of the type of MMP violation.
Violation Date	Date that a violation occurred. For averaging period limitation violations, such as weekly and monthly averages, the last day of the reporting period is used such as last day of the week (Saturday) and last day of the month, respectively.
NCHRON	Non-serious violation falls within the first three violations in a 180-day period, thus, not subject to MMP.
SIG	Serious Violation as defined in Water Code sections 13385(h) and 13385.1(a)(1).

**R5-2024-0521 – ATTACHMENT B  
COMPLIANCE PROJECT DESCRIPTION**

**Compliance Project Title:**

Chester Public Utility District I/I Prevention Project

**Geographic Area of Interest:**

Chester Public Utility District I/I Prevention Project

**Name of Responsible Entity:**

Chester Public Utility District (Discharger)

**Contact Information:**

Adam Cox, General Manager  
Chester Public Utility District  
P.O. Box 503  
Chester, CA 96020  
(530) 258-2171  
[cpud@frontiernet.net](mailto:cpud@frontiernet.net)

**Compliance Project Description and Goals:**

The goal of the project is to combat Chester Public Utility District's I&I "infiltration and inflow" issues. The district has struggled with infiltration into their collection system due to years of degradation. Meeting their permit requirements during wet winters has been inconsistent during discharge to Lake Almanor. The plan is to attack the I&I issue by investing specific tools that will strategically seal the collection system. The project is divided into two flexible phases.

Phase 1 includes:

- 1) Measure manhole diameters for all 240 manholes in the Chester Public Utility District. All manholes will have manhole inserts installed. This will reduce rainfall from infiltrating the collection system. Also, while operators are out measuring manholes, they will be documenting areas that need a camera to identify infiltration.
- 2) Invest in a camera system that can camera deep into the sanitation lines and lateral's where the operator can view and identify critical areas of infiltration.

Phase 2 includes:

- 1) Investing in tools for Facility repairs that cause I&I issues, such as roto hammer drill that is battery operated for safety in wet conditions, emergency gas detector, safety hoist, Seal Guard Chemical Grout

**R5-2024-0521 – ATTACHMENT B  
COMPLIANCE PROJECT DESCRIPTION**

2) Invest in sanitation plugs for all size sewer lines.

Utilizing cameras from Phase 1, there will be the capability to isolate a sewer line that has been identified and locate an area in need of repair. Once an area in need of repair has been located, it will need to be excavated to fix the issue. With safety in mind. We will invest in shoring to keep Facility operators safe.

Repairs of the manholes will be conducted during Phase 2. Manholes in the district are in bad shape, with around 90 percent of them installed in the 1950s and new tools will be utilized to repair them. During repairs, investment of a quality gas detector is needed for safety in the manholes, and a safety hoist to extract an operator in case of an emergency. A hoist can also be utilized by the operator for any seal work that is needed in higher areas in the manhole. Finally, investing in a good supply of Seal Guard Chemical Grout which is a highly reactive dual component hydrophobic polyurethane. The Seal Guard Chemical Grout reacts to infiltrating water and seals leaks.

Estimated Cost of Compliance Project Completion:  
The total estimated cost of the project cost is: \$56,000.62

Dewalt Roto hammer	\$529
My Tana Sewer Camera	\$15,710.66
Parson Manhole inserts	\$8000.00 - \$11,000
Tri pod safety wench	\$8505.06
Multi Gas Detector	\$6032.81
Sewer plugs 6 to 12"	\$928.09
Seal Guard Grout	\$700.00 - \$6500.00
Shoring	\$7000.00

**Compliance Project Milestones and Completion Dates:**

The Compliance Project will be completed no later than one year from the effective date of the Stipulated Order approving this Compliance Project (Stipulated Order).

**Final Report:**

No later than one year of from the effective date of the Stipulated Order, the Chester Public Utility District will submit a final report declaring the completion of the Compliance Project and detailing fund expenditures and goals achieved. The report shall clearly show whether the final cost of the completed Compliance Project is less than, equal to, or more than the suspended liability of \$33,000, and shall comply with the "Certification of Completion" provision in Section II of the Stipulated Order.