



# California Regional Water Quality Control Board

## San Francisco Bay Region



**Linda S. Adams**  
Acting Secretary for  
Environmental Protection

1515 Clay Street, Suite 1400, Oakland, California 94612  
(510) 622-2300 • Fax (510) 622-2460  
<http://www.waterboards.ca.gov/sanfranciscobay>

**Edmund G. Brown, Jr.**  
Governor

*Certified Mail No.  
Return Receipt Requested*

June 28, 2011  
WDID No. 2 011 021583 (DCE)

Friendly Cab Company, Inc.  
Attn. Mrs. Surinder Singh, Mr. Baljit Singh, and Mr. Dhar Mann  
4849 East 12<sup>th</sup> Street  
Oakland, California 94601

Friendly Cab Company, Inc.  
Attn. Mr. Baljit Singh  
Agent for Service of Process  
4849 East 12<sup>th</sup> Street  
Oakland, California 94601

Ackland International, Inc.  
Attn. Mr. Ekundayo Sowunmi, P.E.  
333 Hegenberger Road, Suite 304  
Oakland, CA 94621

**Subject: Administrative Civil Liability Complaint No. R2-2011-004 for Industrial Stormwater General Permit Violations**

Dear Sirs and Madam:

Enclosed is Administrative Civil Liability Complaint No. R2-2011-0041 (Complaint), which proposes to assess an administrative civil liability (ACL) against Friendly Cab Company, Inc. (Friendly Cab) in the amount of \$100,400. This proposed liability is based on allegations that Friendly Cab violated California Water Code (CWC) Section 13385(a)(2) by failing to comply with waste discharge requirements set forth in Water Quality Order No. 97-03-DWQ, NPDES General Permit No. CAS000001, Waste Discharge Requirements for Discharges of Storm Water Associated with Industrial Activities (General Permit). The administrative civil liability is imposed under the authority of CWC Section 13385(c).

Friendly Cab can respond to the Complaint by appearing before the Regional Water Board at a public hearing to contest the matter or by signing a waiver to pursue other options.

1. The Complaint can be contested before the Regional Water Board at the following meeting:

Date/Time: September 14, 2011, commencing at 9:00 a.m.  
Place: First Floor Auditorium, Elihu Harris State Building  
1515 Clay Street, Oakland

*Preserving, enhancing, and restoring the San Francisco Bay Area's waters for over 60 years*

At this meeting, the Regional Water Board will consider whether to impose administrative civil liability (as proposed in the Complaint or for a different amount), decline the administrative civil liability, or refer the matter to the Attorney General for judicial enforcement at a public hearing.

Please refer to the enclosed Public Notice and Hearing Procedure for the Complaint and the ACL Fact Sheet for additional information about the Regional Water Board's process, hearing procedure, and important deadlines (for submitting comments or evidence, obtaining designated party status, waiving or postponing a hearing, making objections or rebuttals to evidence, etc.).

2. The public hearing that has been scheduled (above) can be waived to pursue one of the following options:
  - a. Pay the liability as proposed in the Complaint;
  - b. Request more time and postpone the date of the public hearing; or
  - c. Promptly engage in settlement discussions with the Regional Water Board Prosecution Team during which Friendly Cab can raise settlement options, including supplemental environmental projects (SEPs) and enhanced compliance projects that meet the State Water Resources Control Board's requirements for such projects.

The Waiver, attached to the Complaint, describes these options in further detail. To pursue one of these options, **the Waiver must be signed, dated, and received by Sandia Potter of the Regional Water Board Advisory Team with a copy to the Prosecution Team contact listed below no later than 5:00 p.m. on July 28, 2011. It is at the discretion of the Regional Water Board Advisory Team to either accept or deny a waiver request.**

For more information about SEPs and the project selection and proposal approval process, or for assistance with selecting a candidate project for an SEP, please contact Athena Honore of the San Francisco Estuary Partnership (SFEP) at (510) 622-2325 or via email to [ahonore@waterboards.ca.gov](mailto:ahonore@waterboards.ca.gov). To see examples of current and completed projects, visit SFEP's website: [www.sfestuary.org/projects/detail.php?projectID=38](http://www.sfestuary.org/projects/detail.php?projectID=38).

If you wish to communicate directly with the Prosecution Team regarding the Complaint, please contact David Elias at (510) 622-2509 or via email to [delias@waterboards.ca.gov](mailto:delias@waterboards.ca.gov).

Please refer to the letterhead for our mailing address and fax number.

Sincerely,

Thomas E. Mumley  
Assistant Executive Officer

Enclosures: ACL Complaint No. R2-2011-0041  
Waiver Form for ACL Complaint No. R2-2011-0041  
Public Notice and Hearing Procedure for ACL Complaint No. R2-2011-0041  
Administrative Civil Liability Fact Sheet

cc: Regional Water Board Lyris Enforcement email list  
Regional Water Board Advisory Team  
Regional Water Board Prosecution Team  
Mr. Craig Pon, City of Oakland, cpon@oaklandnet.com