

California Environmental Protection Agency

State Water Resources Control Board

REPORT TO LEGISLATURE

Per California Water Code Chapter 5.5 Section 13385 (o)

Enforcement Activities of the Regional Water Quality Control Boards - 2003

February 2004

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REPORT TO THE LEGISLATURE

Per California Water Code Chapter 5.5 Section 13385 (o) Enforcement Activities of the Regional Water Quality Control Boards -2003

This report has been prepared by the State Water Resources Control Board (SWRCB) in compliance with the provisions contained in Chapter 5.5 Section 13385 (o) of the California Water Code. This report responds to the following provision:

13385. Civil Liability

(o)(1) Notwithstanding Section 7550.5 of the Government Code, the state board shall report annually to the Legislature regarding its enforcement activities. The reports shall include all of the following:

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

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

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

(D) Recommendations, if any, necessary for improvements to the enforcement program in the following year.

(2) The report shall be submitted to the Chairperson of the Assembly Committee on Environmental Safety and Toxic Materials and the Chairperson of the Senate Committee on Environmental Quality on or before March 1, 2001, and annually thereafter.

Executive Summary

This report summarizes information regarding violations of waste discharge requirements and enforcement actions taken by the Regional Water Quality Control Boards (RWQCBs) 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 an analysis of current enforcement policies, and includes recommendations for improvements. Copies of other recent reports to the Legislature can be found at <http://www.swrcb.ca.gov/news.html>.

The SWRCB and RWQCBs 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.

Four major findings of this report are:

- (1) The total number of violations of waste discharge requirements at NPDES facilities has declined over the past four years.
- (2) The number of effluent violations has not decreased significantly.
- (3) Although improvements occurred over the past year, data quality problems persist and the backlog of violations not yet entered into the data system continues to be significant due to continued reliance on manual review of discharger self-monitoring reports and data entry;
- (4) The percentage of violations that do not have a reported enforcement action has risen during the past four years.
- (5) The backlog of violations for which the RWQCBs have not yet issued mandatory minimum penalties (MMPs) continues to increase.

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

Introduction

This report addresses violations of Waste Discharge Requirements for discharges to surface water. Discharges to surface water are permitted and issued Waste Discharge Requirements under the National Pollutant Discharge Elimination System (NPDES). The NPDES program is delegated to the State by the United States Environmental Protection Agency and implemented through Chapter 5.5 of the California Water Code. NPDES Waste Discharge Requirements are usually issued by one of the State's nine RWQCBs. The nine RWQCBs and twelve regional offices lie within different watersheds and are as follows (see Appendix A for map and details):

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

1. Persistent data quality problems.

Data quality and completeness, although improved over the past year, continue to be a challenge. Reviews indicate that entry of violations is inconsistent between RWQCBs and has been delayed in several Regions. Ongoing problems with the development and implementation of the compliance module in the SWIM database include system errors and design changes that have frustrated data entry efforts. Limited reporting capabilities have discouraged routine use of the available information. A team has been identifying and fixing bugs, resolving design problems,

and developing training materials. Improved reporting capability, training, data quality assurance, and revised business processes that include data maintenance as a routine function are all elements of a plan to mature the data management capabilities. Even with these system improvements, some data problems are anticipated to continue because of reliance on manual review and data entry of discharger monitoring information.

In last year's report we discussed data entry problems at the Los Angeles RWQCB (Region 4). The Los Angeles RWQCB has an aggressive enforcement program but they had accumulated a large backlog of violations that had not been entered into the data system. They have since redirected resources from other projects in order to eliminate this backlog. As a result of those efforts more than 1,378 year-2002 violations have now been entered into the database. An additional 1,285 year-2003 violations have also been entered.

2. Federal Facilities

The use of the SWIM database for Federal Facilities has been inconsistent. All RWQCBs have found it difficult to prevail in enforcement against federal facilities. Sovereign immunity is argued and enforcement actions stayed. The San Diego RWQCB initially entered all identified violations at federal facilities into the database. This effort was discontinued, early in 2001 because of their inability to enforce. The SWIM database currently includes 1491 violations that occurred at federal facilities in Region 9 during 2000, 349 violations in 2001, 36 violations in 2002 and 49 in 2003. This significant reduction in recorded violations does not represent improved compliance at federal facilities. When that misleading data is included in summary information about violations, it has a dramatic impact on the apparent trend of violations in that Region, and for the entire state. For that reason, this report does not include violations and enforcement actions for federal facilities.

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

At the time of report preparation, there are 2,329 active 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; and
- 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 (also called “permits”) are either 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 RWQCB is shown in Table 1.

Table 1: NPDES facilities by category and Regional Office

REGIONAL OFFICE	MAJOR FACILITIES			MINOR FACILITIES			Total
	GENERAL Permit Enrollees	INDIVIDUAL Permits	Total	GENERAL Permit Enrollees	INDIVIDUAL Permits	Total	
1	4	16	20	24	34	58	73
2	4	56	60	188	53	241	297
3	6	21	27	78	29	107	128
4	8	42	50	465	146	611	653
5F	1	6	7	17	39	56	61
5R	1	13	14	19	56	75	88
5S	4	39	43	106	68	174	213
6A	3	1	4	22	4	26	27
6B	4	1	5	13	7	20	21
7	5	11	16	40	15	55	66
8	6	20	26	486	31	517	537
9	33	36	69	77	25	102	165
Total	79	262	341	1,535	507	2,042	2,329

*Data compiled on January 20, 2004. It does not include Federal Facilities.

This report is required to include a compilation of violations that occurred between January 1, 2003 and December 31, 2003. Unfortunately, there is a lag in the manual review and data entry process and this data is not complete, particularly for the latter part of 2003. The NPDES program requires dischargers to periodically monitor their effluent and to report the results to the RWQCB in self-monitoring reports. Typically, those reports are due to the RWQCB 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, violations which occur after September are normally not known and recorded in the tracking database until at least the following January. Except for the few reports that are submitted electronically, staff must then review the reports, identify the violations and manually enter them into the data system. The time lag for this process varies, but can be significant.

Table 2 lists the total number of violations of NPDES waste discharge requirements, by RWQCB office for each of the past four years. The table shows a decrease in the number of total violations over that period. Most RWQCB enforcement coordinators report that their dischargers have taken steps to increase compliance rates in order to avoid MMPs. As discussed later in Section (C), effluent violations have not decreased significantly.

Table 2: Annual number of violations of NPDES waste discharge requirements from 2000 to 2003

Violations of NPDES Waste Discharge Requirements				
Regional Office	2000	2001	2002	2003
1	899	532	340	175
2	564	507	321	179
3	339	454	348	236
4	1,657	1,737	1,378	1,285
5F	454	789	845	616
5R	241	94	108	18
5S	1,274	720	643	445
6A	10	11	21	5
6B	6	11	20	12
7	186	237	233	275
8	497	336	213	105
9	285	255	202	180
Total	6,412	5,683	4,672	3,531

* Data compiled on January 20, 2004.

Table 3 lists the total number of violations of NPDES waste discharge requirements, by RWQCB office for each calendar quarter in 2003. The lag in data entry is clearly shown in that the number of violations reported for the 4th quarter is only sixteen percent of the number reported for the 1st quarter.

Table 3: Violations of NPDES waste discharge requirements by quarter for 2003

Violations of NPDES Waste Discharge Requirements					
Regional Office	Qtr 1 1/1/03 - 3/31/03	Qtr 2 4/1/03 - 6/30/03	Qtr 3 7/1/03 - 9/30/03	Qtr 4* 10/1/03 - 12/31/03	Total for 2003
1	83	57	25	10	175
2	63	72	25	19	179
3	84	77	41	34	236
4	552	418	282	33	1,285
5F	224	206	178	8	616
5R	6	10	0	2	18
5S	146	121	142	36	445
6A	1	4	0	0	5
6B	10	1	1	0	12
7	78	76	92	29	275
8	30	55	14	6	105
9	66	44	30	40	180
Total	1,343	1,141	830	217	3,531

* Data compiled on January 20, 2004. The 4th Quarter data is assumed to be incomplete.

A comparison of the number of violations by Region and the number of facilities regulated in that Region is provided in Table 4. The data indicate an uneven distribution of the average number of violations per facility among the different RWQCB offices. The reasons for this inconsistency include differences in facility-specific requirements, differences in processes and

priority assigned to report review and data entry, and differences in rates of compliance among dischargers.

Table 4: Number of violations per facility for 2003.

Number of Facilities Compared to Number of NPDES Violations			
Regional Office	NPDES Facilities	Total Violations	Violations per facility
1	73	175	2.4
2	297	179	0.6
3	128	236	1.8
4	653	1,285	2.0
5F	61	616	10.1
5R	88	18	0.2
5S	213	445	2.1
6A	27	5	0.2
6B	21	12	0.6
7	66	275	4.2
8	537	105	0.2
9	165	180	1.1
Total	2,329	3,531	Weighted Average: 1.5

* Data compiled on January 20, 2004.

A breakdown of the violation types and the number of those violations that are identified as priority violations is presented in Table 5. A more detailed description of each violation category is provided in Appendix B. When evaluating violation data it is important to distinguish between different types of violations. Violations vary from not submitting monitoring reports on time to acute toxicity violations. The RWQCBs identify priority violations based on the criteria identified in the SWRCB Water Quality Enforcement Policy (Resolution No. 2002-0040). A priority violation represents a greater threat to water quality than other violations. Approximately 18 percent of NPDES violations have been identified as priority violations.

Table 5: NPDES violations by category for 2003.

Breakdown of the Number of NPDES Violations by Category for 2003					
Description of Violation Category (See Appendix B)	Total Violations		Priority Violations		
	Number	%	Number	% of Total Priority	% of Total Violations
Category 1 Pollutant	963	27%	319	49%	9%
Other Effluent Violation	963	27%	43	7%	1%
Failure to submit Reports or Report is Deficient	723	20%	29	4%	1%
Category 2 Pollutant	435	12%	203	31%	6%
Violation of Non-Effluent Permit Condition	167	5%	39	6%	1%
Sanitary Sewer Overflow	113	3%	3	0%	0%
Acute Toxicity	73	2%	3	0%	0%
Chronic Toxicity	37	1%	2	0%	0%
Unregulated Discharge	37	1%	8	1%	0%
Pretreatment Program	18	1%	0	0%	0%
Compliance Schedule	1	0%	0	0%	0%
Failure to Obtain Permit	1	0%	0	0%	0%
Total	3,531		649		18%

*Data compiled on January 20, 2004.

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

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 SWRCB or RWQCB 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 of water quality laws, regulations, policy or orders such as cleanup and abatement orders. Appendix C describes the enforcement options used by the SWRCB and RWQCBs.

Table 6 shows the number of violations for each year since January 2000. It also lists the number of violations for which no enforcement action is recorded, 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 the percentage of that category compared to the total number of violations. The sum of these percentages is greater than 100 percent because one violation can receive multiple enforcement actions.

Table 6: NPDES violations compared to enforcement actions.

NPDES Violations Compared to Enforcement Actions																
Regional Office	2000				2001				2002				2003			
	Total Violations	Total Violations without Enforcement Actions	Total Violations with Informal Enforcement Actions	Total Violations with Formal Enforcement Actions	Total Violations	Total Violations without Enforcement Actions	Total Violations with Informal Enforcement Actions	Total Violations with Formal Enforcement Actions	Total Violations	Total Violations without Enforcement Actions	Total Violations with Informal Enforcement Actions	Total Violations with Formal Enforcement Actions	Total Violations	Total Violations without Enforcement Actions	Total Violations with Informal Enforcement Actions	Total Violations with Formal Enforcement Actions
1	899	444	276	210	532	169	318	92	340	253	46	46	175	114	52	9
2	564	144	66	392	507	173	61	289	321	196	15	111	179	151	8	20
3	339	127	43	237	454	184	104	233	348	150	65	149	236	157	25	57
4	1657	290	1276	476	1737	636	1034	422	1378	805	510	128	1285	986	254	85
5F	454	50	272	165	789	263	387	147	845	310	475	60	616	266	350	0
5R	241	19	195	44	94	29	59	12	108	49	56	27	18	4	14	1
5S	1274	588	451	463	720	420	251	122	643	431	162	56	445	239	156	51
6A	10	7	3	0	11	9	2	0	21	17	4	0	5	5	0	0
6B	6	2	4	0	11	2	8	1	20	5	13	2	12	5	7	0
7	186	19	152	100	237	86	81	124	233	67	118	136	275	25	231	25
8	497	111	118	400	336	76	108	206	213	53	70	85	105	65	19	18
9	285	28	188	230	255	83	160	161	202	5	211	196	180	4	176	61
Total	6,412	1,829	3,044	2,717	5,683	2,130	2,573	1,809	4,672	2,341	1,745	996	3,531	2,021	1,292	327
Percentage		29%	47%	42%		37%	45%	32%		50%	37%	21%		57%	37%	9%

* Data compiled on January 20, 2004.

It should be noted that the percentage of violations that have not been linked to any enforcement action rises steadily from 29 percent for violations that occurred in 2000 to 57 percent for violations that occurred in 2003. This appears to represent a decreased rate of enforcement that cannot be attributed to just the time lag between a violation and the enforcement response.

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

1. Status of Current Enforcement Policy

On February 19, 2002, the SWRCB adopted the current Water Quality Enforcement Policy. The primary goal of the Policy is to create 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 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.

2. Analysis of 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 RWQCB 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 that an MMP of \$3,000 be assessed by the RWQCB for each serious violation. A serious violation is 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 RWQCBs are also required by California Water Code section 13385(i) to assess MMPs of \$3,000 for chronic, non-serious violations. The penalty applies for such violations when the discharger does any of the following four or more times in any period of six consecutive months:

- 1) violates WDR 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 WDRs do 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 RWQCBs 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, 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.

Summary Of MMP Violations And The Growing Backlog Of MMP Enforcement Actions

As stated above, for violations that are subject to MMPs, the RWQCB must either issue the MMP or assess an ACL for a greater amount.

As of January 20, 2003, the SWIM database included 7,812 violations that occurred between January 1, 2000 and June 30, 2003 that are subject to MMPs. Of these, 3,265 (42 percent) are recorded as having received a penalty at the minimum or greater amount. Appendix D lists the 459 facilities that have had one or more violations subject to MMPs. Appendix D also shows which violations have had either the minimum penalty or a larger ACL assessed. Violations during the last six months of 2003 are excluded due to the normal time lag involved in identifying violations and issuing the MMP.

Table 7 summarizes the data from Appendix D and shows the number of violations that have had penalties issued by each RWQCB office.

Table 7: Status of violations that are subject to MMPs . January 2000-June 2003

Regional Office	TOTAL MMP VIOLATIONS January 2000 June 2003	VIOLATIONS With MMP/ACL ENFORCEMENT	VIOLATIONS Without MMP/ACL ENFORCEMENT	% Without
1	538	106	432	80%
2	1131	678	453	40%
3	599	458	141	24%
4	2285	771	1514	66%
5F	360	21	339	94%
5R	86	13	73	85%
5S	1502	281	1221	81%
6A	0	0	0	NA
6B	0	0	0	NA
7	358	168	190	53%
8	686	540	146	21%
9	267	229	38	14%
TOTAL	7812	3265	4547	58%

Last year we reported that 298 facilities had accumulated a total of 4,669 MMP violations. Of those violations, 49 percent received either an MMP or an ACL. Appendix D now lists 459 facilities and a total of 7,812 MMP violations. This increase is largely due to recent intensive data cleanup efforts by RWQCB staff.

As noted earlier, effective January 1, 2004, the RWQCBs must implement additional MMPs for late submittal of discharge monitoring reports. The SWRCB has estimated that approximately 5,000 reporting violations a year may be subject to an MMP of \$3,000. This new legislative mandate will have a significant impact on the RWQCBs' enforcement workload and could result in further increases in the backlog of MMPs.

Figure 1 is a bar graph showing the cumulative total number of violations by month that are subject to MMPs. The darker portion of each bar shows the cumulative number of penalties for which MMPs have been issued. The lighter portion of each bar shows the backlog of violations for which MMPs have not yet been issued.

Figure 1: Violations subject to MMPs with and without penalties.

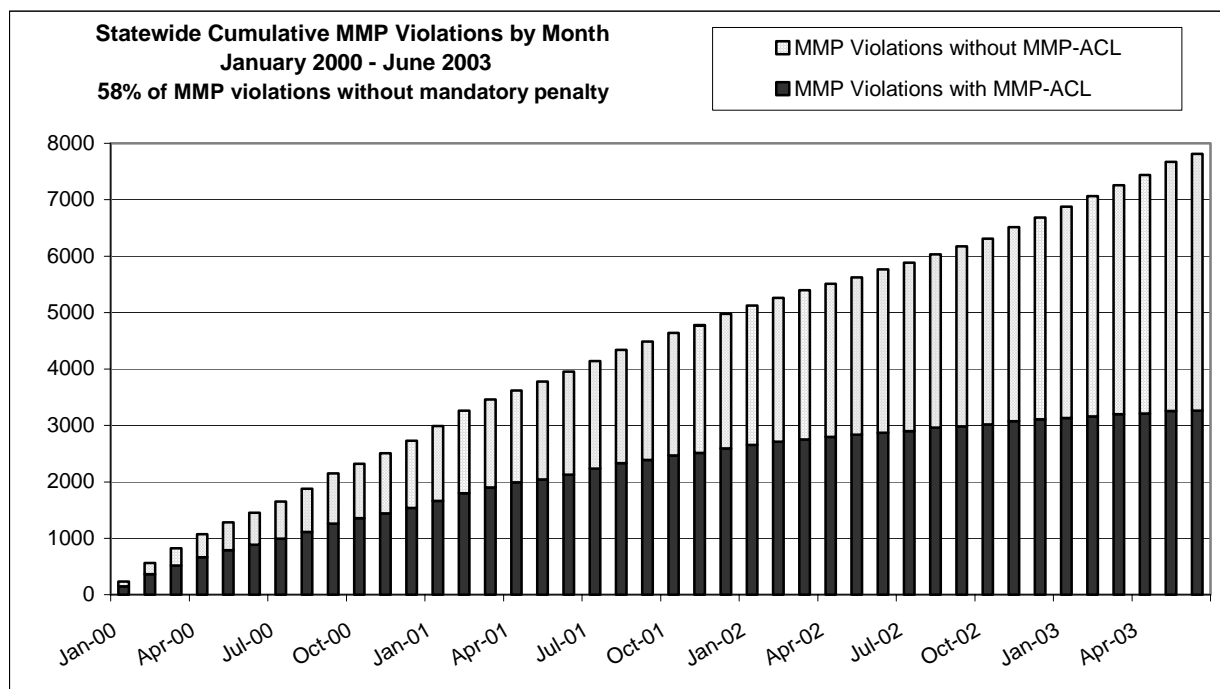


Table 8 lists the number of facilities in each RWQCB office that have one or more MMP violations, the number of facilities for which MMPs have been issued for all MMP violations, and the number of facilities that would require at least one enforcement action to cover the outstanding MMP violations. As shown, approximately 365 enforcement actions would be necessary to cover the backlog of the 4,547 violations subject to MMPs. Since January 2000 the RWQCBs have issued a total of 313 MMPs.

Table 8: Facilities with MMP violations and pending enforcement actions.

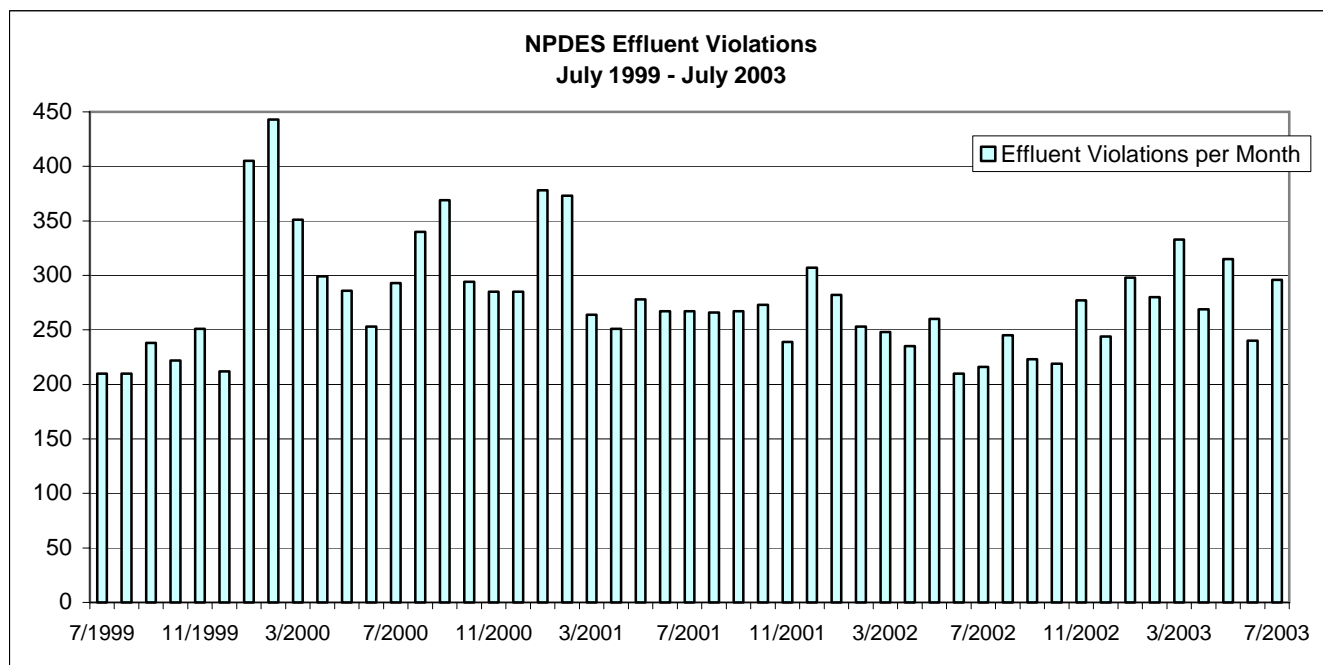
Regional Office	Facilities with MMP violations	Facilities with all MMP penalties issued	Facilities with pending MMP penalties
1	19	0	19
2	64	14	50
3	19	5	14
4	210	37	173
5F	11	0	11
5R	13	3	10
5S	52	7	45
6A	0	0	0
6B	0	0	0
7	13	1	12
8	30	11	19
9	28	16	12
TOTAL	459	94	365

Effluent Violations

In last year’s report we stated that the data indicated there had been an overall reduction in the number of effluent violations at NPDES facilities and that we believed the reduction was at least partly a result of increased compliance due to the deterrent effect of Mandatory Minimum Penalties.

During the past year data entry has improved significantly resulting, unfortunately, in a less optimistic picture of compliance rates. As discussed previously, we also recognized the significant effect that inconsistent data entry for federal facilities had on summary violation data and have therefore removed federal facilities from our analysis. Figure 2 plots effluent limit violations for each month from July 1999 through July 2003. Although the total number of violations appears to have decreased significantly during the past four years (as discussed in section A of this report), the number of violations of effluent limits at NPDES facilities has not decreased significantly.

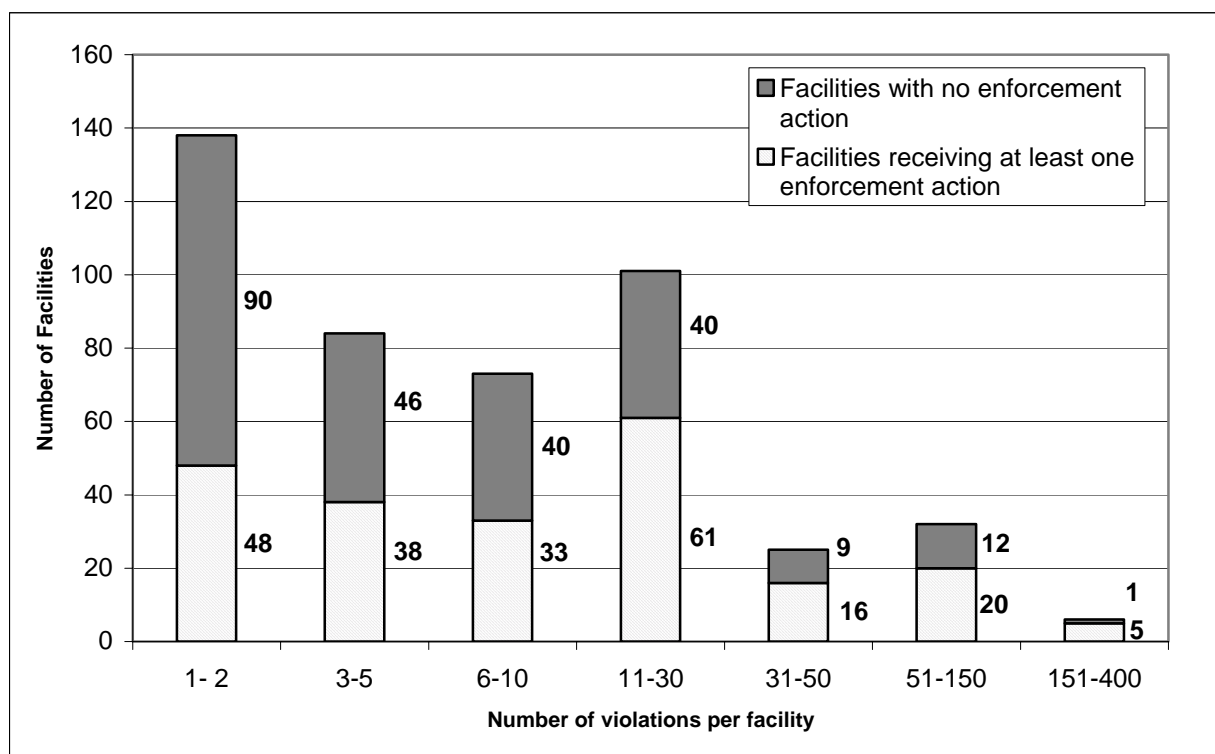
Figure 2: NPDES effluent violations from 7/1/1999 to 7/31/2003.



Distribution Of Violations Subject To Minimum Penalties

In analyzing the effectiveness of MMPs on compliance levels, we subdivided those facilities with MMP violations by the number of MMP violations they have incurred since January 2000. As shown in Figure 3, most facilities (64 percent) have incurred ten or fewer violations. Eight percent of facilities with MMP violations have more than fifty MMP violations each. Figure 3 also shows how many facilities had received at least one MMP or ACL assessing at least the minimum penalty.

Figure 3: Histogram showing the distribution of violations and penalties.



Approximately, 60 percent of facilities with from one to ten MMP violations each have not yet been issued an MMP. This is probably due to the relatively high staff resource costs associated with issuing MMPs. The RWQCBs prioritize MMP issuance to facilities with greater compliance problems. Of the 221 facilities that received one or more penalty, 94 have not reported any more violations that are subject to MMPs.

Case Studies

The SWRCB previously selected and gathered detailed information on eight facilities that were in chronic noncompliance and had received an MMP for violations during the first six months of 2000. Those facilities were reviewed to determine if:

1. The facility is quickly returning to compliance,
2. The facility has undertaken measures that will return it to compliance in the future, or
3. There was no change in the facility’s actions as a result of the MMP.

The SWRCB is continuing to review these example facilities to determine what, if any, effect the issuance of MMPs has had regarding their compliance status. Two of the facilities previously reported (Coachella Sanitary District #2 and City of Coachella) have combined to become one discharger (City of Coachella).

Table 9: Case studies of the compliance rate of 7 facilities receiving an MMP action.

Discharger (Region)	Current overall compliance status	Was significant compliance expected by Jan. 2002? ¹	Has significant compliance been achieved?
City of Petaluma (2)	The facility has continuing violations related to algae bloom in the ponds. The City does not expect to be able to improve that situation significantly with the existing system and is planning to construct a new treatment facility to be located adjacent to the oxidation ponds. The engineering design is about 75% complete as of November 2003. Final engineering plans are expected by May 2004, with construction scheduled for completion by 2007 or 2008. The estimated project cost is approximately \$68 million. The new treatment facility is expected to come on-line in mid 2008 and should dramatically increase compliance.	Yes	No
Ragged Point Inn (3)	Since issuing the MMP in 2000, violations have decreased due to increased permitted flow limit (increased under a revised permit), and improved treatment plant operations. The Discharger proposed use of recycled water, and the RWQCB considered and reissued the NPDES permit for this facility in October of 2003. With the reissuance the Discharger is now utilizing recycled water at select locations within the facility, with eventual plans to eliminate most of their ocean discharge by recycling water from their WWTP.	Yes	Yes
California Men's Colony (3)	Assessed three MMPs: one for \$33,000, one for \$87,000, and in November 2002 one for \$45,000. Major \$20 million upgrade of the facility is still pending with ground breaking expected in Winter 2004, and final completion in 2005. Violations still continue.	No	No
Pismo Beach (3)	In addition to two previous MMPs this facility has accumulated \$735,000 in penalties from July 2001 to July 2002. The City of Pismo Beach is scheduled to break ground on a new WWTP in early 2004 (slipping from Fall 2003), with completion of the facility scheduled for Winter 2004/05. Improvements in operation have reduced violations dramatically. Since July there have been only two violations, both in October.	No	No.

Discharger (Region)	Current overall compliance status	Was significant compliance expected by Jan. 2002? ¹	Has significant compliance been achieved?
City of Coachella (7)	Violations continue. The RWQCB has issued MMPs in excess of \$300,000 with over \$200, 000 more to collect. This is a substantial amount for a City of approximately 30,000 people. Coachella is looking toward the State Revolving Fund to provide \$27.5 Million to build a new facility to replace its aging treatment system. Final design plans for the new facility are due by June 2004. The bid process is expected in September 2004 and construction is expected to take between 12 to 18 months. Coachella has also undertaken several significant projects to get back into compliance such as improved operations and maintenance, correcting problems associated with their oxidation ponds system (solids from ponds are being removed and additional aeration has been added), and looking at their collection system to determine if illegal discharges are taking place (an illegal grease discharger was found and is no longer discharging). This has recently resulted in improved compliance.	Yes	No
Centinella State Prison (7)	There has been a major increase in compliance. No violations have been noted in the last nine months.	Yes	Yes
City of Corona (8)	Permit was modified so that the facility is no longer violating its effluent limitations. Facility is generally in compliance although it continues to have sporadic weekly average coliform violations (5 in the past year). Compliance with other limits (TDS, Na, etc.) has been maintained since the permit was revised.	Yes	Yes

¹ Compliance record and predictions are for violations for which the MMPs were previously assessed. In some cases, different types of violations have been observed after the initial assessment of MMPs.

As shown, three of the seven facilities have successfully returned to compliance and the remaining four facilities are implementing substantial facility upgrades.

Problems Encountered

Except for the initial exemption of the first three chronic violations every six months, mandatory minimum penalties of \$3000 apply equally to violations of widely different magnitudes. For example, a slight violation of an instantaneous maximum effluent limit for a small dewatering operation can carry the same minimum penalty as a significant violation of a monthly average limit for a billion gallon-a-day power plant. Although the RWQCBs have the authority to issue ACLs for amounts higher than the MMP, resource limitations normally favor the decision to impose the (relatively simpler) minimum penalty. It is important to note that when an MMP is issued, the economic benefit of noncompliance is not considered. Economic benefit is to be considered in situations where a discretionary (higher than the minimum) ACL is issued.

MMPs have resulted in dischargers requesting RWQCBs to revise permits to reduce potential exposure to MMPs. Dischargers are also more likely to appeal certain limits in the court system to avoid exposure to MMPs. Finally, issuance of the MMP ACL can take a considerable amount of staff time. All these issues surrounding MMPs substantially impact the RWQCBs' ability to issue other enforcement orders, and take away staff time previously devoted to other regulatory activities.

(D) Recommendations for improvements to the 2004 enforcement program.

1. Improve process for issuing MMPs.

As shown, the existing backlog of MMPs that need to be issued is substantial. Implementation of the new MMPs for reporting violations is expected to increase the number of violations subject to mandatory penalties and could increase the growing backlog. In order to address the new reporting MMPs and reduce the existing backlog the SWRCB will:

- Develop improved tools for tracking report submittal
- Develop standard templates for MMPs;
- Investigate additional methods to simplify, standardize and stream-line MMP issuance;
- Develop criteria for prioritizing MMP issuance;
- Investigate the potential for directing a portion of the penalties collected toward reduction of the backlog; and
- Investigate alternate approaches, including legislative changes, to facilitate automatic submittal of penalties by dischargers.

2. Improve data systems and data quality

The SWRCB will continue to improve the SWIM database regarding violation and enforcement information. The SWRCB considers improved reporting capabilities a top priority and will continue work with the RWQCBs on data quality improvements. The SWRCB will continue to explore and implement electronic submittal of discharger monitoring reports with automatic compliance checking to identify reported violations. Automated report submittal and review will significantly reduce both the data entry lag time and the cost of regular report review.

Appendix A

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARDS

North Coast Region (1)

5550 Skylane Blvd Suite A
 Santa Rosa, CA, 95403
 Susan Warner, EO
 TEL: (707) 576-2220
 FAX: (707) 523-0135

San Francisco Bay Region (2)

1515 Clay Street,
 Suite 1400
 Oakland, CA, 94612
 Loretta K. Barsamian, EO
 TEL: (510) 622-2300
 FAX: (510) 622-2460

Central Coast Region (3)

81 Higuera St., Suite 200
 San Luis Obispo, CA, 93401-5427
 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
 Dennis Dickerson, EO
 TEL: (213) 576-6600
 FAX: (213) 576-6640

Central Valley Region (5S)

3443 Routier Road, Suite A
 Sacramento, CA 95827-3098
 Gary M. Carlton, EO
 TEL: (916) 255-3000
 FAX: (916) 255-3015

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)

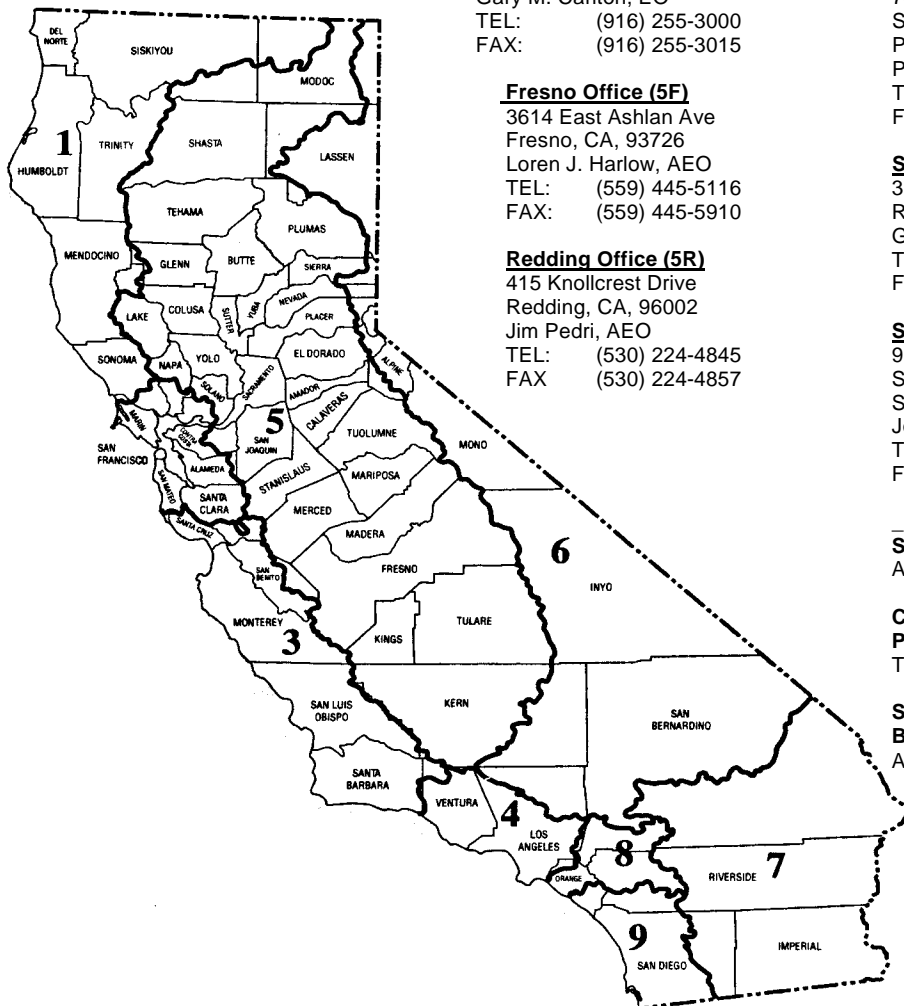
73-720 Fred Waring Drive
 Suite 100
 Palm Desert, CA, 92260
 Phil Gruenberg, EO
 TEL: (760) 346-7491
 FAX: (760) 341-6820

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
 Terry Tamminem, *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: 50%; vertical-align: top;"> Oxygen Demand Biochemical Oxygen Demand Chemical Oxygen Demands Total Organic Carbon Other Solids Total Suspended Solids (Residues) Total Dissolved Solids (Residues) Other Nutrients Inorganic Phosphorus Compounds Inorganic Nitrogen Compounds Other Detergents and Oils MBAS NTA Oil and Grease Other detergents or algaecides </td> <td style="width: 50%; vertical-align: top; border: none;"> <table style="width: 100%; border: none;"> <tr><td style="border: none;"><u>Minerals</u></td></tr> <tr><td style="border: none;">Calcium</td></tr> <tr><td style="border: none;">Chloride</td></tr> <tr><td style="border: none;">Fluoride</td></tr> <tr><td style="border: none;">Magnesium</td></tr> <tr><td style="border: none;">Sodium</td></tr> <tr><td style="border: none;">Potassium</td></tr> <tr><td style="border: none;">Sulfur</td></tr> <tr><td style="border: none;">Sulfate</td></tr> <tr><td style="border: none;">Total Alkalinity</td></tr> <tr><td style="border: none;">Total Hardness</td></tr> <tr><td style="border: none;">Other Minerals</td></tr> <tr><td style="border: none;"> </td></tr> <tr><td style="border: none;"><u>Metals</u></td></tr> <tr><td style="border: none;">Aluminum</td></tr> <tr><td style="border: none;">Cobalt</td></tr> <tr><td style="border: none;">Iron</td></tr> <tr><td style="border: none;">Vanadium</td></tr> </table> </td> </tr> </table>	Oxygen Demand Biochemical Oxygen Demand Chemical Oxygen Demands Total Organic Carbon Other Solids Total Suspended Solids (Residues) Total Dissolved Solids (Residues) Other Nutrients Inorganic Phosphorus Compounds Inorganic Nitrogen Compounds Other Detergents and Oils MBAS NTA Oil and Grease Other detergents or algaecides	<table style="width: 100%; border: none;"> <tr><td style="border: none;"><u>Minerals</u></td></tr> <tr><td style="border: none;">Calcium</td></tr> <tr><td style="border: none;">Chloride</td></tr> <tr><td style="border: none;">Fluoride</td></tr> <tr><td style="border: none;">Magnesium</td></tr> <tr><td style="border: none;">Sodium</td></tr> <tr><td style="border: none;">Potassium</td></tr> <tr><td style="border: none;">Sulfur</td></tr> <tr><td style="border: none;">Sulfate</td></tr> <tr><td style="border: none;">Total Alkalinity</td></tr> <tr><td style="border: none;">Total Hardness</td></tr> <tr><td style="border: none;">Other Minerals</td></tr> <tr><td style="border: none;"> </td></tr> <tr><td style="border: none;"><u>Metals</u></td></tr> <tr><td style="border: none;">Aluminum</td></tr> <tr><td style="border: none;">Cobalt</td></tr> <tr><td style="border: none;">Iron</td></tr> <tr><td style="border: none;">Vanadium</td></tr> </table>	<u>Minerals</u>	Calcium	Chloride	Fluoride	Magnesium	Sodium	Potassium	Sulfur	Sulfate	Total Alkalinity	Total Hardness	Other Minerals	 	<u>Metals</u>	Aluminum	Cobalt	Iron	Vanadium
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Aluminum																					
Cobalt																					
Iron																					
Vanadium																					
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 RWQCB 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 RWQCB or SWRCB.	Formal
Settlement	A settlement agreement not associated with any of the above orders.	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 RWQCB is a party.	Formal
Waste Discharge Requirements	Any modification or rescission of Waste Discharge Requirements in response to a violation.	Formal

List of Facilities with Violations Subject to MMP Actions and Violations Receiving Penalties by RWQCB Office from 1-1-2000 through 6-30-2003

Region	Agency	Facility	WDID	MMP Violations	Violations Receiving Penalty	Status of MMP for Facility
1	ARCATA, CITY OF	ARCATA CITY WWTF	1B82114OHUM	93	0	
1	EUREKA, CITY OF	EUREKA CITY ELK RIVER WWTP	1B82151OHUM	1	0	
1	FERNDALE, CITY OF	FERNDALE CITY POTW	1B83136OHUM	26	0	
1	FORT BRAGG, CITY OF	FORT BRAGG CITY WWTP	1B84083OMEN	55	0	
1	FORTUNA, CITY OF	FORTUNA CITY WWTP	1B83135OHUM	13	0	
1	GEORGIA PACIFIC CORPORATION	GP FORT BRAGG SAW	1B84089OMEN	14	0	
1	LOLETA CSD	LOLETA POTW	1B80081OHUM	35	0	
1	MCKINLEYVILLE CSD	MCKINLEYVILLE WWTP	1B82084OHUM	15	0	
1	MENDO CO WWD #2 ANCHOR BAY	MENDOCINO CWWD#2-ANCHOR BAY	1B83118OMEN	9	0	
1	REDWAY CSD	REDWAY POTW	1B83147OHUM	6	0	
1	SANTA ROSA DEPT OF PUBLIC WORKS	SANTA ROSA CITY WWTP, LAGUNA	1B83099OSON	35	17	
1	SONOMA COUNTY WATER AGENCY	SCWA FORESTVILLE CSD	1B83100OSON	29	0	
1	SONOMA COUNTY WATER AGENCY	SCWA GRATON CSA NO. 2	1B84060OSON	12	0	
1	SONOMA COUNTY WATER AGENCY	SCWA OCCIDENTAL CSD	1B83001OSON	103	77	
1	SONOMA COUNTY WATER AGENCY	SCWA RUSSIAN RIVER CSD	1B82045OSON	11	0	
1	STOCKTON PACIFIC ENTERPRISES	LP SAMOA PULPMILL	1B77005OHUM	25	12	
1	TULELAKE, CITY OF	TULELAKE CITY WWTP	1A84002OSIS	54	0	
1	WILLITS, CITY OF	WILLITS CITY WWTP	1B80078OMEN	1	0	
1	YREKA, CITY OF	YREKA CITY WWTP	1A84073OSIS	1	0	
			Total	538	106	

2	APPLIED MATERIALS INC.	974 ARQUES,AP.MAT.-B81 DEWATER	2 438146001	1	0	
2	BENICIA, CITY OF	BENICIA WWTP	2 482001001	18	16	
2	BURLINGAME, CITY OF	BURLINGAME WWTP	2 417005001	21	12	
2	C & H SUGAR	C & H SUGAR WWTP	2 071006001	22	11	
2	CALIF DEPT OF PARKS & RECR	ANGEL ISLAND STATE PK - WWTP	2 215002001	12	10	Issued

Region	Agency	Facility	WDID	MMP Violations	Violations Receiving Penalty	Status of MMP for Facility
2	CALISTOGA, CITY OF	CALISTOGA WW TREATMENT PLANT	2 283003001	27	26	
2	CENTRAL MARIN SANITATION AGENCY	CENTRAL MARIN SAN. AGCY. WWTP	2 215116001	14	13	
2	CHEVRON PRODUCTS CO	1020 BERRYESSA, CHEVRON TRMNL	2 438309001	1	0	
2	CHEVRONTEXACO	9000 CARQUINEZ SCENIC	2 071204002	3	0	
2	COAST OIL CO.	2075 ALUM ROCK, SJ, BULK PLANT	2 438448002	1	0	
2	CONOCOPHILLIPS	SAN FRANCISCO REFINERY, RODEO	2 071051001	3	2	Scheduled
2	CONTRA COSTA CO	PORT COSTA WWTP	2 071034001	19	0	Scheduled
2	DELTA DIABLO SANITATION DIST.	DELTA DIABLO SAN. DIST. WWTP	2 071013001	6	6	
2	EAST BAY MUNICIPAL UTILITY DIS	ORINDA FILTER PLANT	2 071113001	4	4	
2	FAIRFIELD-SUISUN SEWER DISTRICT	FSSD SUBREGIONAL WWTP	2 482005001	33	20	Scheduled
2	GENERAL CHEMICAL	GENERAL CHEMICAL- WWTP	2 071001001	15	9	Issued
2	GENERAL ELECTRIC COMPANY	VALLECITOS NUCLEAR CENTER	2 019018001	6	4	
2	HANSON AGGREGATES	4501 TIDEWATER AVE, OAKLAND	2 019216001	63	0	Issued
2	HANSON AGGREGATES	HANSON AGGREGATES	2 386028001	57	16	Scheduled
2	HEWLETT PACKARD CO	1501 PAGE MILL RD, HP B1-6	2 438063003	2	1	
2	KOBE PRECISION INC	KOBE PRECISION INC	2 019328001	7	0	Scheduled
2	LAS GALLINAS VALLEY S.D.	LAS GALLINAS WWTP	2 215012001	15	10	Scheduled
2	LIVERMORE, CITY OF	LIVERMORE WPCP	2 019025001	4	4	
2	MALLINCKRODT, INC.	4101 LICK MILL, MNSN GRV APTS.	2 438517001	3	3	
2	MARTINEZ REFINING CO	SHELL MARTINEZ REFINRY	2 071042001	3	2	Issued
2	MISSION VALLEY ROCK COMPANY	MISSION VALLEY ROCK COMPAN	2 019321001	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	NAPA SANITATION DISTRICT	NAPA SD WWTP	2 283009001	59	49	Scheduled
2	NEC ELECTRONIC INC	501 ELLIS, MTV, NEC ELECTRONIC	2 438162001	2	0	
2	NEW CENTURY BEVERAGE COMPANY	BOTTLING GROUP LLC	2 019320001	3	2	
2	NORTH SAN MATEO COUNTY SD	NORTH SAN MATEO WWTP	2 417021001	9	0	
2	NOVATO SANITARY DISTRICT	NOVATO AND IGNACIO STP	2 215022001	30	15	Scheduled
2	PACIFIC GAS & ELECTRIC CO	HUNTERS POINT POWER PL	2 386003001	1	0	

Region	Agency	Facility	WDID	MMP Violations	Violations Receiving Penalty	Status of MMP for Facility
2	PACIFICA, CITY OF	CALERA CRK WTR RECYCLING PLANT	2 417022002	92	6	
2	PACIFICA, CITY OF	PACIFICA WWTP	2 417022001	39	39	
2	PALO ALTO, CITY OF	PALO ALTO REGIONAL WQC PLANT	2 438011001	55	47	Issued
2	PETALUMA, CITY OF	PETALUMA WPCP	2 494006001	48	29	Scheduled
2	PINOLE, CITY OF	CITY OF PINOLE WWTP	2 071032001	12	8	
2	REYNOLD SCHWEICKHARDT	2790 HOMESTEAD, SC, L KENNEDY	2 438526002	1	0	
2	RICHMOND, CITY OF	RICHMOND WPCP	2 071037001	67	58	Scheduled
2	RODEO SANITARY DISTRICT	RODEO SD	2 071039001	14	11	
2	ROMIC ENVIRN TECHNOLOGIES CORP	2081 BAY RD, ROMIC ENVIRN TECH	2 438221002	17	17	
2	SAN FRANCISCO, CITY & CO	BAYSIDE CSO	2 386010003	4	3	
2	SAN FRANCISCO, CITY & CO	SF - SE NORTH POINT & BAYSIDE	2 386010001	1	1	
2	SAN FRANCISCO, CITY AND CO	SF INT AIRPORT IND WTP	2 417033001	9	4	
2	SAN FRANCISCO, CITY AND CO	SF INT AIRPORT WQCP	2 417032001	11	10	
2	SAN JOSE/SANTA CLARA WPCP	SAN JOSE/SANTA CLARA WPCP	2 438014001	3	0	
2	SAN MATEO, CITY OF	SAN MATEO WQCP	2 417035001	28	21	
2	SANTA CLARA CO ROADS & AIRPORT	OREGON EXP UNDERPASS	2 438265002	2	2	
2	SAUSALITO-MARIN CITY SAN DIST	SAUSALITO STP	2 215023001	13	10	Scheduled
2	SEWER AUTHORITY MID-COASTSIDE	SAM WWTP	2 417068001	20	20	
2	SEWERAGE AGENCY OF SO. MARIN	SASM WWTP	2 215015001	2	2	
2	SIEMENS ISELIN	10950 N TANTAU, CUP SIEMENS ME	2 438124002	8	8	
2	SONOMA VALLEY COUNTY S. D.	SONOMA VALLEY COUNTY S.D. WWTP	2 494009001	49	47	
2	SOUTH BAYSIDE SYSTEM AUTHORITY	SBSA WWTP	2 417037001	4	0	
2	SOUTH SAN FRANCISCO STP	S SF/SAN BRUNO WQCP	2 417038001	71	45	Issued
2	SOUTHERN ENERGY CALIFORNIA	PITTSBURG POWER PLANT	2 071030001	17	0	
2	SUNNYVALE, CITY OF	SUNNYVALE STP	2 438018001	6	6	
2	ULTRAMAR, INC.	TESORO REFINING & MARKETING CO	2 071048001	12	3	Scheduled
2	USS-POSCO	USS-POSCO IND	2 071059001	21	14	No action planned

Region	Agency	Facility	WDID	MMP Violations	Violations Receiving Penalty	Status of MMP for Facility
2	VALLEJO SAN AND FLOOD CONT DIS	VALLEJO SFCD WWTP	2 482012001	21	18	Scheduled
2	WEST COUNTY AGENCY	COMBINED OUTFALL	2 071107001	15	11	Scheduled
2	ZENECA INC, WESTERN RESEARCH	ZENECA, RICHMOND PLANT	2 071185001	2	2	
Total				1131	678	
3	CA DEPT OF CORRECTIONS	CALIFORNIA MEN'S COLONY	3 400108001	121	79	Scheduled
3	CA STATE PARKS	BIG BASIN WWTP	3 440800001	51	51	Scheduled
3	CARMEL AREA WWD	CARMEL AREA WWTP	3 270101001	2	2	
3	CARPINTERIA SD	CARPINTERIA SD WWTP	3 420101001	4	2	Scheduled
3	DUKE ENERGY MORRO BAY LLC	DUKE MORRO BAY POWER PLANT	3 402003002	3	0	Scheduled
3	GOLETA SD	GOLETA SD WWTP	3 420102001	1	1	Scheduled
3	GROWERS ICE COMPANY	GROWERS ICE COMPANY	3 271042001	3	0	Scheduled
3	HIGHLANDS INN INVESTORS	HIGHLANDS INN WWTP	3 271000001	1	0	Scheduled
3	HIGHLANDS SA	HIGHLANDS SA WWTP	3 270115001	25	18	Issued
3	LOMPOC, CITY OF	LOMPOC REGIONAL WWTP	3 420105001	26	13	Scheduled
3	MORRO BAY & CAYUCOS SD	MORRO BAY/CAYUCOS WWTP	3 400103001	8	7	Issued
3	PASO ROBLES, CITY OF	PASO ROBLES WWTP	3 400105001	2	0	Scheduled
3	PISMO BEACH, CITY OF	PISMO BEACH WWTP	3 400106001	267	258	Scheduled
3	RAGGED POINT INN	RAGGED POINT INN MOTEL	3 401001001	22	22	
3	RMC PACIFIC MATERIALS INC	RMC LONESTAR SANTA CRUZ CEMENT	3 442004003	4	0	Scheduled
3	SAN LUIS OBISPO, CITY OF	SAN LUIS OBISPO WWTP	3 400107001	46	4	Scheduled
3	SAN SIMEON CSD	SAN SIMEON WWTP	3 400110001	1	1	
3	SANTA BARBARA CITY PWD	EL ESTERO WWTP NPDES	3 420108001	10	0	Scheduled
3	SOUTH SAN LUIS OBISPO CO SD	SOUTH SAN LUIS OBISPO SD WWTP	3 400111001	2	0	
Total				599	458	
4	THE BOEING COMPANY	ROCKETDYNE DIV. - SANTA SUSANA	4B562013002	32	11	
4	VOPAK TERMINAL LOS ANGELES INC	VOPAK TERMINAL LOS ANGELES INC	4B199019002	33	31	

Region	Agency	Facility	WDID	MMP Violations	Violations Receiving Penalty	Status of MMP for Facility
4	MCA / UNIVERSAL CITY STUDIOS	UNIVERSAL CITY STUDIOS	4B199017001	89	87	
4	PLAYA CAPITAL CO., LLC	PLAYA VISTA SITE	4B196800049	2	0	
4	UNOCAL CORP.	SERVICE STATION #3016	4B196800046	2	0	Scheduled
4	UNIVAR USA INC.	FORMER VOPAK USA INC.	4B196800038	5	0	Scheduled
4	PORT OF LONG BEACH	PIER A TOE DRAIN TREATMENT SYS	4B196800029	64	32	
4	CALTRANS	LA-105 GARFIELD/ARDIS AVE.	4B196800025	12	0	Scheduled
4	TESORO PETROLEUM	TARGET STORE-290	4B196800023	3	0	
4	FAIRCHILD HOLDING CORP.	FAIRCHILD FASTENERS SCREWCORP	4B196800017	9	9	
4	LOS ANGELES CITY OF DWP	POLLOCK WELLS TREATMENT PLANT	4B196800016	3	0	
4	NELOWE PROPERTIES C/O HMC	NELOWE PROPERTIES C/O HMC	4B196800012	2	0	
4	LOS ANGELES MAISON	HOTEL SOFITEL LOS ANGELES	4B196800009	3	3	
4	ERIC REALTY, INC.	ERIC REALTY, INC.	4B196800006	2	0	
4	XEROX CORPORATION	XEROX POMONA FACILITY	4B196800005	18	0	Scheduled
4	UNITED TECHNOLOGIES CORP.	CARRIER CORPORATION	4B196800002	8	0	Scheduled
4	ASHLAND CHEMICAL COMPANY	ASHLAND CHEMICAL COMPANY	4B196800001	4	1	
4	CALCLEAN INC.	CALCLEAN INC. (CARSON)	4B196600163	1	0	
4	CONOCOPHILLIPS COMPANY	76 PRODUCTS STATION #1747	4B196600148	3	0	
4	ATLANTIC RICHFIELD COMPANY	FORMER ARCO SERVICE STN. #1860	4B196600144	1	0	
4	UNOCAL CORP.	UNOCAL SS #5894	4B196600110	1	1	
4	EXXONMOBIL OIL CORPORATION	MOBIL SS#11-FRN	4B196600097	10	0	Scheduled
4	LASMO PETROLEUM INC.	CARSON TANK FARM	4B196600077	2	0	
4	SOUTHERN CALIFORNIA WATER CO.	JUAN PLAN SITE	4B196400069	1	1	
4	SSR WESTERN MULTIFAMILY LLC	ALLIANCE PROPERTY MANAGEMENT	4B196400067	1	0	
4	CERTIFIED ALLOY PRODUCTS, INC.	CERTIFIED ALLOY PRODUCTS, INC.	4B196400064	2	0	
4	THE BOEING COMPANY	C1 (LONG BEACH) FACILITY	4B196400063	5	5	
4	RADISSON LOS ANGELES AIRPORT	RADISSON LOS ANGELES AIRPORT	4B196400060	4	0	
4	AIR PRODUCTS & CHEMICALS, INC.	CARSON HYDROGEN PLANT	4B196400054	4	4	
4	MAGUIRE PARTNERS	THE GAS COMPANY TOWER	4B196400050	2	0	
4	LOS ANGELES TIMES	PARKING STRUCTURE 213 S.SPRING	4B196400046	1	1	

Region	Agency	Facility	WDID	MMP Violations	Violations Receiving Penalty	Status of MMP for Facility
4	SOUTHERN CALIFORNIA WATER CO.	TRURO FE & MN FILTRATION PLANT	4B196400045	1	0	
4	GRIFOLS BIOLOGICALS INC.	BLOOD FRACTIONATION & PROCESS	4B196400043	19	0	Scheduled
4	GOODRICH CORPORATION	GOODRICH CORPORATION	4B196400039	12	10	
4	HERMETIC SEAL CORP.	HERMETIC SEAL CORP.	4B196400038	1	1	
4	SOUTHERN CALIFORNIA WATER CO.	GOLDMEDAL PLANT	4B196400037	1	0	
4	METROPOLITAN WATER DIST. OF SC	VENICE POWER PLANT	4B196400035	7	0	Scheduled
4	SIERRACIN/SYLMAR CORP.	SIERRACIN.SYLMAR CORP.	4B196400009	6	0	Scheduled
4	ARCO TERMINAL SERVICES CORP.	MARINE TERMINAL #3	4B196300136	1	0	
4	LOS ANGELES CITY OF DWP	SEPULVEDA TRUNK LINE PROJECT	4B196300132	6	0	Scheduled
4	WEST BASIN MUNICIPAL WATER DIS	WEST BASIN WATER RECYCLING	4B196300039	1	0	
4	USC UNIVERSITY HOSPITAL, INC.	USC UNIV. HOSP NORRIS TOWER	4B196100112	6	0	Scheduled
4	CEDARS-SINAI MEDICAL CENTER	CENDARS SINAI-NORTH CARE TWR	4B196100111	1	0	
4	CEDARS-SINAI MEDICAL CENTER	CEDARS-SINAI MEDICAL CENTER	4B196100094	2	0	
4	DOUGLAS, EMMETT & CO.	WILSHIRE LANDMARK II BUILDING	4B196100075	1	0	
4	LOS ANGELES CITY OF DWP	BURBANK TRUNK LINE	4B196100072	18	18	
4	SOUTHERN CALIFORNIA WATER CO.	YUKON NO. 5	4B196100068	11	7	
4	PLAYA CAPITAL CO., LLC	PLAYA PHASE I COMMERCIAL	4B196100065	11	0	Scheduled
4	CASDEN PARK LA BREA "B", LLC	PARK LA BREA PARCEL "B"	4B196100062	2	2	
4	LA CO MUSEUM OF NATURE SCIENCE	GEORGE C PAGE MUSEUM	4B196100056	11	1	
4	CASDEN PARK LA BREA "A", LLC	PARK LA BREA, PARCEL A	4B196100055	3	0	
4	TUTOR-SALIBA TEAM	MID-CORRIDOR PIPELINE RELOCATI	4B196100037	5	5	
4	GEORGE & ERIKA KABOR FAMILY TR	LA CIENEGA CENTER	4B196100025	5	5	
4	LOS ANGELES CITY OF DWP	LOS ANGELES HARBOR WRP	4B196100023	3	1	
4	WILSHIRE WEST PARTNERS	WILSHIRE RENAISSANCE APTS.	4B196100020	7	0	Scheduled
4	SONY PICTURES ENTERTAINMENT	THE CULVER STUDIOS	4B196100019	7	4	
4	LE MONTROSE HOTEL	LE MONTROSE HOTEL	4B196100008	3	0	
4	HPG MANAGEMENT	DETROIT APARTMENT, 360 S	4B196100006	1	1	
4	HPG MANAGEMENT	HANCOCK PARK PLACE APTS	4B196100005	1	1	
4	INDUSTRY URBAN DEVEL. AGENCY	CHERYL LANE DEWATERING SYSTEM	4B196000632	8	0	Scheduled

Region	Agency	Facility	WDID	MMP Violations	Violations Receiving Penalty	Status of MMP for Facility
4	ARDEN REALTY L. P.	WILSHIRE-SAN VICENTE PLAZA	4B196000620	1	0	
4	CLARK CONSTRUCTION GROUP INC.	CALTRANS DIST. 7 HEADQUARTERS	4B196000615	50	49	Issued
4	THUMS LONG BEACH COMPANY	POWER PLANT @PORT OF LONGBEACH	4B196000607	2	0	
4	LOS ANGELES CITY OF DWP	ANAHEIM EMERGENCY STORM DRAIN	4B196000591	5	0	Scheduled
4	LAKELWOOD, CITY OF	WELL # 14 PUMP TEST PROJ.	4B196000571	1	1	
4	WALNUT VALLEY WATER DISTRICT	WELL FACILITY	4B196000555	4	0	
4	EAST PASADENA WATER CO.	WATER WELL NO. 10 AND 8	4B196000550	1	0	
4	DOUGLAS EMMETT REALTY ADVISORS	ONE WESTWOOD- DOUGLAS EMMETT R	4B196000540	13	13	Issued
4	PORT OF LONG BEACH	FORMER U. S. NAVY SHIPYARD	4B196000537	2	0	
4	UNIVERSITY OF CALIFORNIA LA	UNIVERSITY OF CALIFORNIA LA	4B196000532	3	2	
4	LA CITY BUREAU OF SANITATION	MARINA INTERCEPTOR SEWER LINE	4B196000517	24	15	
4	CEDARS-SINAI MEDICAL CENTER	CEDARS-SINAI MEDICAL CENTER	4B196000515	1	1	
4	LA CO DEPT OF PUBLIC WORKS	ALAMITOS BARRIER PROJECT 1,2&3	4B196000501	29	11	
4	LA CO DEPT OF PUBLIC WORKS	ALAMITOS BARRIER PROJECT 1,2&3	4B196000500	4	0	
4	ONE HUNDRED TOWERS LLC	CENTURY PLAZA TOWERS, OFFICES	4B196000408	6	0	Scheduled
4	VILLA MARINA EAST BOARD OF DIR	VILLA MARINA EAST V	4B196000402	4	0	
4	CORNERSTONE SUBURBAN OFFICE,L	FIRST FINANCIAL PLAZA	4B196000399	5	4	
4	INTERACTIVE CORP.	TICKETMASTER BUILDING	4B196000388	2	0	
4	CALIFORNIA WATER SERVICE CO.	WELLS 21501 & 21502	4B196000375	2	0	
4	CALIFORNIA WATER SERVICE CO.	WELL 29401	4B196000374	4	0	
4	RODEO OWNER CORP.	TWO RODEO ASSOCIATES	4B196000373	27	0	Scheduled
4	EQUITY OFFICE PROPERTIES	THE TOWER	4B196000360	1	1	
4	LB PROPERTY MANAGEMENT	OFFICE BUILDING	4B196000359	1	0	
4	WILROAD ASSOCIATES C/O HINES	WILSHIRE RODEO PLAZA	4B196000355	4	0	
4	PORTOBELLO MANAGEMENT	LAKE VIEW APARTMENTS	4B196000335	7	0	Scheduled
4	LA CO MUSEUM OF NATURE SCIENCE	GEORGE C PAGE MUSEUM	4B196000333	2	2	
4	MERCURY CASUALTY COMPANY	HOME OFFICE BUILDING	4B196000332	1	0	

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4	WB LTD	12100 WILSHIRE BLVD	4B196000297	2	2	
4	JIZHAK FAMILY TRUST	HUNTLEY DRIVE APARTMENT	4B196000283	4	0	
4	LOS ANGELES CITY OF DWP	HOLLYWOOD WQ IMPROVEMENT PJ.	4B196000269	19	19	
4	COPPERFIELD INVESTMENT & DEVEL	WILSHIRE-HIGHLAND BLDG.	4B196000239	26	0	Scheduled
4	FRANCIS PROPERTY MANAGEMENT	585 NORTH ROSSMORE, LTD.	4B196000237	1	0	
4	CEDARS-SINAI MEDICAL CENTER	CEDARS-SINAI MEDICAL CENTER	4B196000236	11	0	Scheduled
4	SUBURBAN WATER SYSTEMS	PLANT 139, WELL #2,4,5,6	4B196000215	1	0	
4	SPYGLASS HOMEOWNERS ASSOC.	SPYGLASS HOMEOWNERS ASSOC.	4B196000188	1	1	
4	LA CO DEPT OF PUBLIC WORKS	STORM DRAIN PROJECT 9037	4B196000182	2	2	
4	M & H REALTY PARTNERS	VILLA MARINA MARKET PL	4B196000167	4	4	
4	HOME SAVINGS	SHERMAN OAKS BRANCH	4B196000144	1	0	
4	BEVERLY HILLS, CITY OF	CITY WELL OF BEVERLY HILLS	4B196000142	15	0	Scheduled
4	G & K MANAGEMENT CO., INC.	GRAND PROMENADE	4B196000135	2	1	
4	JOHN O'KEEFE	SANTA MONICA GATEWAY	4B196000129	1	0	
4	LAWRY'S RESTAURANTS, INC.	LAWRY'S PRIME RIB RESTAURAN	4B196000051	13	0	Scheduled
4	GRAND CENTRAL SQUARE	PARKING STRUCTURE	4B196000035	3	0	
4	JONES LANG LA SALLE	BANK OF AMERICA HARBOR BLDG	4B196000028	1	0	
4	TWO CALIF PLAZA/ARDEN REALTY	TWO CALIF PLAZA/EQUITY OFFICE	4B196000027	4	0	
4	KINNELOA IRRIGATION DIST.	K3 WATER WELL	4B196000011	35	35	
4	SK MANAGEMENT CO. LLC	THE MONET	4B196000008	2	2	
4	SK MANAGEMENT CO. LLC	METRO APARTMENTS	4B196000007	1	0	
4	LOS ANGELES CITY OF DWP	HARBOR GENERATING STATION	4B193500004	49	9	
4	LOS ANGELES CITY OF DWP	HAYNES GENERATING STATION	4B193500002	29	0	Scheduled
4	3M COMPANY	3M PHARMACEUTICALS	4B192594001	1	0	
4	NORTHROP GRUMMAN SP & MSN INC.	SPACE PARK FACILITY	4B192557003	3	3	
4	TRW INC.	HAWTHORNE SITE	4B192557002	1	0	
4	PLASKOLITE WEST, INC.	PLASKOLITE WEST INC.	4B192533001	3	0	
4	LA CO METRO TRANS AUTHORITY	SEGMENTS 1,2A,2B,3 OPERATIONS	4B192515004	4	0	
4	CALIFORNIA DAIRIES INC.	CALIFORNIA DAIRIES INC.	4B192454001	1	0	
4	PARAMOUNT PETROLEUM CORP.	PARAMOUNT REFINERY	4B192348001	6	0	Scheduled

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4	SHORE TERMINAL LLC	WILMINGTON MARINE TERMINAL	4B192263001	1	0	
4	KINDER MORGAN (FORMER GATX)	CARSON TERMINAL	4B192238002	20	12	
4	BP WILMINGTON CALCINER	BP WILMINGTON PLANT	4B192208003	3	2	
4	CONSOLIDATED DRUM RECONDITION	OIL DRUM RECYCLING, SOUTH GATE	4B192178001	3	0	
4	GOLDEN WEST REFINING CO.	SANTA FE SPRINGS REFINERY	4B192162001	10	9	
4	PRAXAIR, INC.	PRAXAIR, WILMINGTON	4B192140001	68	8	
4	CONOCOPHILLIPS COMPANY	LA REFINERY, CARSON PLANT	4B192131026	8	0	Scheduled
4	CONOCOPHILLIPS COMPANY	CONOCOPHILLIPS LA LUB. PLANT	4B192131013	5	0	Scheduled
4	UNITED STATES BORAX & CHEM CORP	WILMINGTON PLANT	4B192129002	1	0	
4	HITCO CARBON COMPOSITES, INC.	HITCO/DEFENSE PROD DIV,	4B192128001	9	8	
4	SHELL OIL PRODUCTS CO.	CARSON SULFUR RECOVERY PLANT	4B192121002	6	0	Scheduled
4	SHELL OIL PRODUCTS CO.	L.A. REFINING CO. (WILMINGTON)	4B192121001	2	0	
4	AES ALAMITOS, L.L.C.	ALAMITOS GENERATING STATION	4B192111006	1	0	
4	AES REDONDO BEACH, LLC	REDONDO GENERATING STATION	4B192111003	23	0	Scheduled
4	LONG BEACH GENERATION LLC	LONG BEACH GENERATING STATION	4B192111002	3	0	
4	EL SEGUNDO POWER, L.L.C.	EL SEGUNDO GENERATING STATION	4B192111001	23	0	Scheduled
4	SHELL OIL PRODUCTS CO.	MORMON ISLAND MARINE TERMINAL	4B192108009	4	3	
4	REDMAN EQUIPMENT & MFG CO	REDMAN EQUIPMENT & MFG.CO	4B192090001	4	3	
4	EXXONMOBIL OIL CORPORATION	MOBIL SS#18-LDM	4B192079026	2	0	
4	MOBIL OIL CORP.	TORRANCE REFINERY	4B192079002	1	0	
4	EXXONMOBIL OIL CORPORATION	SOUTHWESTERN TERMINAL-AREA I	4B192079001	1	1	
4	DAYTON SUPERIOR SPECIALTY CHEM	EDOCO	4B192034001	16	0	Scheduled
4	ULTRAMAR INC.	MARINE TERM, BERTH 164	4B192023002	6	0	Scheduled
4	TIDELANDS OIL PRODUCTION CO.	WILMINGTON AND TERMINAL ISLAND	4B192023001	4	0	
4	BP WEST COAST PRODUCTS LLC	MARINE TERMINAL 1,BERTH 121,LB	4B192010015	1	1	
4	BP WEST COAST PRODUCTS LLC	CARSON REFINERY	4B192010008	1	0	
4	ALAMEDA CORRIDOR TRANS. AUTHOR	ALAMEDA MID-CORRIDOR TRENCH PJ	4B191340001	65	47	
4	COLTEC INDUSTRIES INC.	FORMER MENASCO AEROSYSTEM FACI	4B191318001	6	0	Scheduled

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4	PACIFIC REFINING CO.	FORMER WESTERN FUEL OIL	4B191311001	1	0	
4	PORT OF LOS ANGELES	NEW DOCK ST PUMP STATION	4B191310001	2	0	
4	CHANNEL ISLAND MARINE RESOURCE	CHANNEL ISLAND MARINE RESOURCE	4B191309001	5	0	Scheduled
4	EASTMAN CHEMICAL CO	EASTMAN CHEMICAL CO	4B191297001	6	0	Scheduled
4	U.S. GYPSUM CO.	U.S. GYPSUM CO.	4B191287001	1	0	
4	AIR PRODUCTS & CHEMICALS, INC.	HYDROGEN PLANT & RELATED FAC.	4B191285001	28	2	
4	HONEYWELL INC.	HONEYWELL INC.	4B191263001	2	0	
4	WHEELABRATOR NORWALK ENERGY CO	STATE HOSPITAL COGENERATION PT	4B191168001	31	0	Scheduled
4	ROYAL CATERING	ROYAL CATERING, EL MONTE	4B191106001	31	30	
4	RMR PROPERTIES	RMR PROPERTIES	4B191086001	20	13	
4	SALVATION ARMY, THE	RED SHIELD YTH & COMMUNITY CTR	4B191016001	1	0	
4	CSU, LONG BEACH	CSU, LONG BEACH, POOL, ETC	4B190800001	19	8	
4	LACNTY. FAIRHOTEL&EXPO COMPLEX	FAIRPLEX	4B190144001	9	0	Scheduled
4	REDONDO BEACH, CITY OF	SEASIDE LAGOON	4B190143001	17	15	
4	PASADENA, CITY OF	DEPT. OF WATER & POWER	4B190138001	3	3	
4	SANTA MONICA, CITY OF	SANTA MONICA WATER TRT. PLANT	4B190122001	1	1	
4	LA CO SANITATION DISTRICTS	SAN JOSE CREEK WWRP	4B190107020	10	0	
4	LA CO SANITATION DISTRICTS	LOS COYOTES WWRP	4B190107015	2	0	
4	LA CO SANITATION DISTRICTS	JWPCP, CARSON	4B190107013	11	11	
4	LOS ANGELES CITY OF DWP	TUNNEL # 105	4B190106099	3	1	
4	LOS ANGELES CITY OF DWP	TANK F,G AREA,HAYNES PLT, LB	4B190106050	3	0	
4	LOS ANGELES CITY OF DWP	TANK E AREA, HAYNES PLT, LB	4B190106049	10	4	
4	LOS ANGELES CITY OF DWP	HARBOR G.S. - MARINE TANK FARM	4B190106046	1	0	
4	LOS ANGELES CITY OF DWP	TANK H, J AREA, HAYNES PLT. LB	4B190106042	5	1	
4	LOS ANGELES CITY OF DWP	TANK A,B,C,D AREA,HAYNES PL, LB	4B190106007	9	0	
4	LA CITY BUREAU OF SANITATION	TILLMAN WWRP	4B190106004	38	0	
4	LAS VIRGENES MWD	TAPIA WRF	4B190104004	3	0	Scheduled
4	LAS VIRGENES MWD	TAPIA WRF	4B190104001	13	2	

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4	AVALON, CITY OF	AVALON WWTF	4B190100001	2	0	
4	CONOCOPHILLIPS COMPANY	FORMER 76 STATION #5228	4A566800045	42	0	
4	VENTURA CO DEPT OF AIRPORT	FORMER CONDOR LUFT SITE	4A566600174	2	0	
4	PLEASANT VALLEY REC & PARK DIS	FREEDOM PARK	4A566600155	6	0	Scheduled
4	VENTURA CO FIRE DEPT.	VENTURA COUNTY FIRE STATION#30	4A566600133	10	0	Scheduled
4	VENTURA CO FLOOD CONTROL DIST.	SANTA CLARA UNIT IIB	4A566000606	3	0	
4	CALLEGUAS MUNICIPAL WATER DIST	RSMP- BRINE LINE PHASE 1	4A566000605	10	0	Scheduled
4	PACIFIC COMMUNITIES BUILDER	TRACT MAP #5171 (APN 222-01)	4A566000566	1	0	
4	THOUSAND OAKS CITY OF DPW	CITY OF THOUSAND OAKS	4A566000563	25	16	
4	RMR, INC.	SPINNAKER LIFT STATION PROJECT	4A566000541	7	0	Scheduled
4	THOUSAND OAKS, CITY OF	UNIT W & F INTERCEPTOR - II	4A566000477	11	0	Scheduled
4	LB/L-SUNCAL MANDALAY, LLC	WESTPORT AT MANDALAY BAY	4A562445001	8	0	Scheduled
4	ANACAPA MARINE SERVICES	ANACAPA MARINE SERVICES	4A562442001	7	6	
4	SKYWORKS SOLUTIONS, INC.	SKYWORKS SOLUTIONS, INC.	4A562074001	2	0	
4	RELIANT ENERGY MANDALAY, LLC	ORMOND BEACH GENERATING STATIO	4A562019002	1	1	
4	RELIANT ENERGY MANDALAY, LLC	MANDALAY GENERATING STATION	4A562019001	1	1	
4	TOSCO CORP.	GASOLINE SERVICE STATIONS	4A561300001	1	0	
4	PNEUMO ABEX AEROSPACE, INC.	PNEUMO ABEX AEROSPACE CORP.	4A561058001	3	2	
4	HARRIS WATER CONDITIONING	CULLIGAN WATER	4A561037001	178	3	
4	THOUSAND OAKS CITY OF DPW	HILL CANYON WWTP	4A560112001	43	0	Scheduled
4	SIMI VALLEY, CITY OF	SIMI VALLEY WWRP	4A560110001	13	12	
4	SANTA PAULA, CITY OF/OMI	SANTA PAULA WWRP	4A560108001	16	0	Scheduled
4	SAN BUENAVENTURA, CITY OF	VENTURA WWRP	4A560107001	48	36	
4	OJAI VALLEY SAN DIST	OJAI VALLEY WWTP	4A560104001	8	8	
4	FILLMORE, CITY OF	FILLMORE WWTP	4A560101002	81	0	Scheduled
4	CAMARILLO SANITARY DISTRICT	CAMARILLO WATER RECLAM. PLANT	4A560100001	57	0	Scheduled
4	SIX FLAGS MAGIC MOUNTAIN	AMUSEMENT PARK, VALENCIA	4A199002002	26	12	
4	NEWHALL LAND AND FARMING CO.	AVENUE SCOTT BRIDGE	4A196000473	7	6	
4	NEWHALL LAND AND FARMING CO.	SOUTH RIVER DEWATERING PROJ.	4A196000467	21	21	
4	HR TEXTRON INC.	VALENCIA FACILITY	4A192332001	2	1	

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4	KEYSOR-CENTURY CORP	PVC-PVA COPOLYMER MFG, SAUGUS	4A192000001	2	0	
4	SANTA CLARITA, CITY OF	DRAINAGE BEN. ASSESS AREA 6&18	4A191142001	30	29	
4	METROPOLITAN WATER DIST. OF SC	FOOTHILL FEEDER POWER PLANT	4A190115006	2	0	
4	LA CO DEPT OF PARKS&RECREATION	VAL VERDE CO. PARK SWIM POOL	4A190107086	13	7	
4	LA CO HEALTH DEPT	ACTON REHABILITATION CENTER	4A190107024	6	6	
4	LA CO SANITATION DISTRICTS	VALENCIA WWRP	4A190107023	65	0	Scheduled
4	LA CO SANITATION DISTRICTS	SAUGUS WWRP	4A190107021	1	0	
Total				2285	771	

5F	ATWATER, CITY OF	WWTF	5C240100001	20	13	Scheduled
5F	CALIFORNIA DAIRIES, INC	LOS BANOS FOODS, INC	5C245017001	1	0	
5F	CALIFORNIA DAIRIES, INC	TIPTON MILK & BUTTER PROC FAC	5D541067001	9	0	
5F	GRIFFIN RESOURCES	MOUNT POSO, POSCAL PAC VILLARD	5D152028001	1	0	
5F	LAND O' LAKES, INC.	GUSTINE CHEESE PROCESSING PLNT	5C242033002	18	0	Violations recorded in error
5F	MALAGA CWD	WWTF	5D100124001	143	0	Scheduled
5F	MERCED, CITY OF	CITY OF MERCED WWTF	5C240108001	13	8	
5F	PLANADA CSD	WWTF	5C240110001	83	0	Scheduled
5F	PLIANT CORPORATION	VITAFILM PLANT	5C242008001	8	0	
5F	SOUTHERN CALIF EDISON CO	BIG CREEK POWERHOUSE NO 1	5C102009001	8	0	
5F	VALLEY WASTE DISPOSAL CO	CAWELO RESERVOIR B	5D152013001	56	0	
Total				360	21	

5S	AUBURN, CITY OF	AUBURN WWTP	5A310100001	1	0	
5S	BRENTWOOD, CITY OF 1	BRENTWOOD WWTP	5B070101001	94	82	Scheduled
5S	CA DEPT OF CORRECTIONS-JAMESTO	SIERRA CONSERVATION CTR-WTP	5C550801002	30	0	

Region	Agency	Facility	WDID	MMP Violations	Violations Receiving Penalty	Status of MMP for Facility
5S	CA DEPT OF FISH & GAME	MOKELUMNE RIVER FISH HATCHERY	5B390800001	1	0	
5S	CA DEPT OF FISH & GAME	NIMBUS HATCHERY	5A340801001	7	7	
5S	CA DEPT OF GENERAL SERVICES	CENTRAL HEATING/COOLING FAC	5A340802001	16	0	Scheduled
5S	CA DEPT OF GENERAL SERVICES	STATE PRINTING & WAREHOUSES	5A340805001	4	0	
5S	CALIF AMMONIA COMPANY	CALAMCO - STOCKTON TERMINAL	5B392095001	3	0	
5S	COLFAX, CITY OF	COLFAX STP	5A310101001	27	0	Issued
5S	COLUSA, CITY OF	COLUSA WWTP	5A060101001	12	0	Issued
5S	CONAGRA GROCERY PRODUCTS CO	CONAGRA OAKDALE FACILITY	5C502023001	60	51	
5S	DAVIS, CITY OF	DAVIS STP	5A570100001	3	0	
5S	DEUEL VOCATIONAL INSTITUTE	DEUEL VOCATNL INST. STP	5B390100001	313	0	Scheduled
5S	DISCOVERY BAY CSD	DISCOVERY BAY TRMT PLANT	5B070105003	75	38	Scheduled
5S	EAST BAY MUD	CAMANCHE DAM POWER HOUSE	5B390114001	1	1	
5S	EL DORADO ID	HYDRO ELECTRIC PROJ (FERC 184)	5A09NP00004	27	0	
5S	GALT, CITY OF	GALT SD	5B340101001	12	0	
5S	GAYLORD CONTAINER CORPORATION	ANTIOCH PULP & PAPER MILL	5B072039001	2	2	
5S	GRASS VALLEY, CITY OF	GRASS VALLEY, CITY OF STP	5A290100001	78	0	
5S	GWF POWER SYSTEMS, L.P.	GWF POWER SYSTEMS, SITE IV	5B072050003	28	1	Scheduled
5S	HUNT-WESSON, INC.	HUNT-WESSON, INC.	5A572002001	6	6	
5S	LINDA CO WATER DISTRICT	LINDA CO WTR DIST WPCP	5A580100002	1	0	
5S	LIVE OAK, CITY OF	CITY OF LIVE OAK WWTP	5A510100001	299	36	Issued
5S	LODI, CITY OF	WHITE SLOUGH WATER POLL CON PU	5B390103002	6	2	
5S	MANTECA, CITY OF	MANTECA WW QUALITY CONTROL FAC	5B390104001	105	0	Scheduled
5S	MIRANT DELTA LLC	CONTRA COSTA POWER PLT ANTIOCH	5B072014008	2	0	
5S	MODESTO ID	MODESTO ID REGIONAL WTP	5C500114003	1	0	
5S	MODESTO, CITY OF	MODESTO WATER QUALITY CTRL FAC	5C500102001	1	0	
5S	NEVADA CO SD #1	CASCADE SHORES WWTP	5A290107002	23	0	
5S	NEVADA CO SD #1	LAKE OF THE PINES WWTP	5A290104003	43	0	

Region	Agency	Facility	WDID	MMP Violations	Violations Receiving Penalty	Status of MMP for Facility
5S	NEVADA CO SD #1	LAKE WILDWOOD WWTP	5A290104001	12	0	
5S	PLACER CO FACILITY SERVICES	PLACER CO SMD NO 1	5A310104007	6	5	
5S	PLACER CO FACILITY SERVICES	SA NO 28, ZONE NO.6	5A310104011	17	0	
5S	PLACERVILLE, CITY OF	HANGTOWN CREEK WWTP	5A090100001	3	3	
5S	PROCTER AND GAMBLE COMPANY	PROCTER & GAMBLE CO WWTP	5A342004001	5	0	
5S	RIO VISTA, CITY OF	RIO VISTA WASTE TRT FACILITY	5A480104001	17	14	Scheduled
5S	RIO VISTA, CITY OF	TRILOGY WWTP	5A480108001	8	1	Scheduled
5S	ROSEVILLE, CITY OF	DRY CREEK WWTP	5A310106001	3	3	
5S	SACRAMENTO CO AIRPORT SYSTEM	SACRAMENTO INTERNATIONAL AIRPT	5A34NP00004	1	0	
5S	SACRAMENTO CO DPW-GOETHE RD	KIEFER LANDFILL GW TREATMENT	5A340311002	1	1	
5S	SACRAMENTO COGENERATION AUTH	SACRAMENTO COGEN AUTH PROJECT	5A342041001	4	0	
5S	SACRAMENTO REGIONAL CSD-SACTO	SACRAMENTO REGIONAL WWTP	5A340108002	17	0	
5S	SEVEN CROWN RESORTS, INC.	PARADISE POINT MARINA	5B391041001	9	0	
5S	TEICHERT AGGREGATES	SETTLING POND DISCHARGE	5A347001001	7	6	
5S	TRACY, CITY OF	TRACY STP	5B390108001	8	0	
5S	TURLOCK, CITY OF	TURLOCK WWTP	5C500108001	38	0	
5S	UC DAVIS	UC DAVIS MAIN STP	5A570800001	9	5	
5S	VACAVILLE, CITY OF	EASTERLY SEWAGE TRT PLANT	5A480105002	35	15	Scheduled
5S	WEST SACRAMENTO, CITY OF	WEST SACRAMENTO STP	5B570103001	3	2	
5S	WEST SACRAMENTO, CITY OF	WEST SACRAMENTO STP	5B570103001	1	0	
5S	WILLIAMS, CITY OF	WILLIAMS WWTP	5A060103001	3	0	
5S	WILLOWS, CITY OF	WILLOWS WWTP	5A110101001	14	0	
			Total	1502	281	
5R	ALTURAS, CITY OF	ALTURAS MUNICIPAL WWTP	5A250100001	1	0	
5R	ANDERSON, CITY OF	ANDERSON WPCP	5A450100001	1	1	
5R	BIGGS, CITY OF	BIGGS WWTP	5A040100001	42	0	Scheduled

Region	Agency	Facility	WDID	MMP Violations	Violations Receiving Penalty	Status of MMP for Facility
5R	CHICO, CITY OF	CHICO REGIONAL WWTF	5A040102001	8	5	Scheduled
5R	COLLINS PINE COMPANY	CHESTER SAWMILL	5A322000001	2	2	
5R	HOLLY TREE RANCH DEVELOPMENT	GREENHORN MINE	5A459010001	3	0	
5R	LEHIGH SOUTHWEST CEMENT CO	LEHIGH SOUTHWEST CEMENT CO	5A452008001	2	0	
5R	MILLENNIUM HOLDINGS LLC	BULLY HILL & RISING STAR MINES	5A459002001	6	0	
5R	MINING REMEDIAL RECOVERY CO	MAMMOTH,SUTRO,KEYSTONE ET AL	5A459006001	10	0	
5R	MT SHASTA, CITY OF	MT SHASTA WWTP	5A470105001	1	0	
5R	QUINCY CSD	QUINCY WWTP	5A320103001	4	0	
5R	RED BLUFF, CITY OF	RED BLUFF WW RECLAMATION PLANT	5A520101001	4	4	
5R	REDDING, CITY OF	CLEAR CREEK WWTP	5A450103001	2	1	
Total				86	13	

6	None			0	0	
Total				0	0	

7	BRAWLEY, CITY OF	BRAWLEY WWTP-NPDES 00-087	7A130100011	37	15	Scheduled
7	CA DEPT OF CORRECTIONS	CENTINELA STATE PRISON 03-096	7A131337001	17	16	Scheduled
7	CALIPATRIA, CITY OF	CALIPATRIA - NPDES 00-002	7A130102041	33	0	Scheduled
7	COACHELLA SANITARY DISTRICT	COACHELLA SD #2 NPDES	7A330104004	19	19	
7	COACHELLA SANITARY DISTRICT	COACHELLA SD - NPDES 00-032	7A330104012	182	104	Scheduled
7	HEBER GEOTHERMAL COMPANY	COVANTA HEBER GEOTH 00-072	7A132160001	4	0	Scheduled
7	IMPERIAL COMMUN. COLLEGE DIST	IMP COMM COLLEGE WTP 99-009	7A130113011	4	3	Scheduled
7	IMPERIAL, CITY OF	IMPERIAL WPCP 00-040	7A130106011	24	4	Scheduled
7	MCCABE UNION SCHOOL DISTRICT	MCCABE UNION SCHOOL 02-001	7A130114011	7	5	Scheduled
7	NILAND SANITARY DISTRICT	NILAND STP 03-049	7A130109011	7	0	Scheduled
7	SEELEY COUNTY WATER DISTRICT	SEELEY CWD WWTP 02-126	7A130111013	14	0	Scheduled
7	VALLEY SANITARY DISTRICT	VALLEY SD STP - NPDES 00-010	7A330122021	3	2	Scheduled

Region	Agency	Facility	WDID	MMP Violations	Violations Receiving Penalty	Status of MMP for Facility
	7WESTMORLAND, CITY OF	WESTMORLAND WWTP 02-004	7A130112012	7	0	Scheduled
				Total	358	168

8	ARIZONA PIPELINE CO.	DEWATERING,BALBOA ISLAND	8 303314001	1	0	
8	BASF CORPORATION	GW CLEANUP-S.A.,BIRCH	8 302770001	2	0	
8	BELL INDUSTRIES	GW CLEANUP-S.A.,RITCHEY	8 303189001	1	1	
8	CALIFORNIA STEEL INDUSTRIES	STORM,MULBERRY DITCH & SAN SEV	8 362023002	18	8	Scheduled
8	CALTRANS - DISTRICT 12	DEWATERING,GENERAL-ORANGE CO.	8 302691001	18	0	
8	COLTON/SAN BERNARDINO RTT&WRA	STP, RIX	8 362375001	48	45	Scheduled
8	CORONA, CITY OF	STP NO. 1	8 330108001	112	99	Scheduled
8	CORONA, CITY OF	STP NO. 3	8 332476001	1	0	Scheduled
8	EXXON MOBIL REFINING & SUPPLY	GW CLEANUP-RIVERSIDE,VALLEY	8 332354001	2	2	
8	GARDEN GROVE, CITY OF	DEWATERING,GENERAL	8 302689001	4	4	
8	HAAGEN COMPANY, LLC	GW CLEANUP-H.B.,EDINGER	8 303335001	1	1	
8	INLAND EMPIRE UTILITIES AGENCY	STP NO 1,ONTARIO-UPLAND	8 360104004	16	11	Scheduled
8	INLAND EMPIRE UTILITIES AGENCY	STP NO 2,CHINO	8 360104001	5	3	Scheduled
8	INTERNATIONAL BAY CLUBS, INC.	DEWATERING,BALBOA BAY CLUB	8 303232001	16	16	
8	IRVINE COMPANY	DEWATERING,GENERAL	8 302448001	3	0	
8	IRVINE RANCH WATER DISTRICT	DEWATERING,GENERAL	8 302006009	18	0	
8	JURUPA COMMUNITY SERVICES DIST	STP,INDIAN HILLS WRP	8 330107002	5	0	
8	MESA CONSOLIDATED WATER DIST	DEWATERING,GENERAL-COSTA MESA	8 302439001	2	0	
8	MOUNTAINVIEW POWER CO., LLC	GENERATING STATION,SAN BERDO	8 362036003	6	6	
8	ORANGE CO. PF&RD	DEWATERING,GENERAL	8 300124001	11	0	
8	ORANGE COUNTY FIRE PROTECTION	DEWATERING,GENERAL	8 303396001	6	0	
8	RAYTHEON COMPANY	GW CLEANUP-FULLERTON,GILBERT	8 302795001	1	1	
8	RIALTO, CITY OF	STP	8 360112001	57	57	
8	SFPP, L.P.	GW CLEANUP-	8 362378001	14	14	

Region	Agency	Facility	WDID	MMP Violations	Violations Receiving Penalty	Status of MMP for Facility
		BLOOMINGTON,RIVERSI				
8	THRIFTY OIL COMPANY	GW CLEANUP-WESTMIN.,WESTMIN.	8 302793001	2	2	
8	USA GASOLINE CORPORATION	GW CLEANUP-BIG BEAR #239	8 362569001	5	0	Scheduled
8	VELASTEGUI, MARCO	GW CLEANUP-H.B.,BEACH	8 303286001	2	2	
8	WESTERN RIVERSIDE CO. RWA	STP,NORCO	8 332353001	106	104	
8	YORBA COUNTRY CAR WASH	GW CLEANUP-YORBA LINDA, YORBA	8 303313001	2	0	
8	YUCAIPA VALLEY WATER DISTRICT	STP	8 362222001	201	164	
			Total	686	540	

9	AMERICAN PLAZA OWNERS ASSOC	ONE AMERICAN PLAZA DEWATER	9 000000469	8	8	
9	ATLANTIC RICHFIELD CO.	ARCO #3012	9 000000941	8	8	
9	BEUS, LEO RAY C/O JNE ASSOC	CORONADO RESIDENCE DEWAT	9 000000947	4	0	
9	CONTINENTAL MARITIME IND, INC	CONTINENTAL MARITIME SHIPYARD	9 000000400	8	8	
9	CORONADO, CITY OF	GLORIETTA BAY PUMP STATION DW	9 000000938	16	16	
9	ENCINA WASTEWATER AUTHORITY	ENCINA OCEAN OUTFALL	9 000000030	2	2	Issued
9	ESCONDIDO, CITY OF	HARRF DISCH TO SAN ELIJO OO	9 000000031	6	3	
9	FALLBROOK PUBLIC UTILITY DIST	FALLBROOK PUD,OCEANSIDE OCN OF	9 000000115	64	62	Issued
9	FIFTH AVENUE CONDOS LLC	FIFTH AVE CONDOS-TRELLIS PROJ	9 000001089	2	0	Issued
9	KINDER MORGAN, MVT, SFPP, L.P.	MISSION VALLEY TERMINAL	9 000000506	9	8	
9	MANCHESTER RESORTS	HYATT HOTEL EXPANSION DEWATER	9 000000951	11	11	
9	MISSION LINEN ENGINEERING	MISSION LINEN SUPPLY	9 000000020	2	2	
9	NATIONAL STEEL & SHIPBUILDING	NASSCO	9 000000066	21	21	
9	NEVADA INVESTMENT HOLDINGS,INC	SUNBELT REMEDTN 1702 O'SIDE BL	9 000000817	4	4	
9	OCEANSIDE,CITY OF,WTR UTIL DEP	OCEANSIDE OCEAN OUTFALL	9 000000146	7	7	
9	PROMENADE MALL DEVELOPMT CORP	PROMENADE AT PACIFIC BCH DEWAT	9 000000588	10	0	
9	RANCHO CALIFORNIA WATER DIST	PRODUCTION WELL #205 DEWATER	9 000000907	4	0	
9	RANCHO CALIFORNIA WATER DIST	RCWD WATR PROD WELL#121 DEWATR	9 000000807	1	1	

Region	Agency	Facility	WDID	MMP Violations	Violations Receiving Penalty	Status of MMP for Facility
9	RANCHO CALIFORNIA WATER DIST	SANTA ROSA WRF-MUR CK DIS-HIST	9 000000601	28	25	
9	SAN DIEGO, CITY OF	SAN DIEGO CONVENTION CTR DEWAT	9 000000329	22	22	
9	SAN ELIJO JOINT POWERS AUTH	SAN ELIJO WPCF	9 000000125	5	2	
9	SEA WORLD, INC	SEA WORLD, SAN DIEGO	9 000000083	7	5	
9	SOCWA-SAN JUAN CREEK OCEAN O/F	SOCWA SAN JUAN CREEK OCEAN O/F	9 000000175	2	2	
9	SOUTHERN CALIFORNIA EDISON	SONGS UNIT 1	9 000000086	3	3	
9	SOUTHLAND CORP	7-11 STORE #20342 REMED	9 000000795	1	0	
9	SOUTHLAND CORP	7-11 STORE 20611	9 000000904	5	5	
9	SOUTHLAND CORP	7-11 STORE 22894 REMED	9 000000910	6	3	
9	SOUTHWEST MARINE, INC	SOUTHWEST MARINE SHIPYARD	9 000000137	1	1	
Total				267	229	

	MMP Violations	Violations Receiving Penalty
GRAND TOTAL:	7,812	3,265

% OF VIOLATIONS W/ MMP:	42%
TOTAL # OF FACILITIES:	459
# OF FACILITIES W/ ENFORCEMENT ACTION:	219
% OF FACILITIES W/ ENFORCEMENT ACTION:	48%