

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
NORTH COAST REGION**

**ADMINISTRATIVE CIVIL LIABILITY COMPLAINT NO. R1-
2026-0023 IN THE MATTER OF
THE HUMBOLDT SAWMILL COMPANY, LLC
(SCOTIA SAWMILL AND COGENERATION PLANT)
HUMBOLDT COUNTY**

This Administrative Civil Liability Complaint (Complaint) is issued by the Assistant Executive Officer of the North Coast Regional Water Quality Control Board (North Coast Water Board) to the Humboldt Sawmill Company, LLC (Respondent) for violations of effluent limitations and discharge monitoring reporting requirements contained in Waste Discharge Requirements (WDRs) Order No. R1-2012-0065 (2012 Order), National Pollutant Discharge Elimination System (NPDES) Permit No. CA0006017, for which the North Coast Water Board may impose civil liability pursuant to Water Code section 13385. This Complaint contains eight effluent limitation violations for Total Suspended Solids (TSS) that occurred between January 3, 2023 and February 26, 2026, and 77 late reporting violations that occurred between October 1, 2024 and April 24, 2026. The North Coast Water Board's Executive Officer has delegated their authority to issue this Complaint to the Assistant Executive Officer.

1. The Respondent owns and operates the Scotia Sawmill and Cogeneration Plant (Facility) (formerly Eel River Power Plant), located at 157 Main Street, Town of Scotia, in Humboldt County. The Facility includes an on-site cogeneration system that produces energy from wood waste, generating industrial wastewater associated with log handling, milling, and power plant operations. On April 26, 2012, the Regional Water Board issued Waste Discharge Requirements Order No. R1-2012-0065 (2012 Order) to the Town of Scotia Company, LLC and Eel River Power, LLC to regulate the Facility, which became effective on July 1, 2012. The 2012 Order requires compliance with effluent limitations for discharges at Discharge Points 015 and 017, among others, and monitoring and reporting.
2. On October 30, 2015, Eel River Power, LLC transferred ownership interest in the Facility to Humboldt Redwood Company, LLC. On May 26, 2017, the North Coast Water Board administratively extended the 2012 Order which currently regulates the Facility. On June 8, 2018, the Respondent (Humboldt Sawmill Company) provided notice to the North Coast Water Board that Humboldt Redwood Company's ownership interest in the Facility, which included the Facility's sawmill and power plant assets, would be transferred to the Respondent effective July 1, 2018. The notice included a Form 200, changing the Facility owner on record with the North Coast Water Board from Humboldt Redwood Company to the Respondent. On August 4, 2022, the Regional Water Board adopted Name Change Order No. R1-2022-0026, formally recognizing the prior change in ownership of the Facility and identifying the Respondent as the permittee responsible for compliance with all 2012 Order terms.

3. The Facility consists of two multimedia filters, a reverse osmosis system, three boilers, and two cooling towers. The boilers convert up to 898 gallons per minute (gpm) of recovered condensate and filtered makeup water from the reverse osmosis system into steam at 600 pounds per square inch and 750 degrees Fahrenheit. Approximately 11,000 gallons per day (gpd) of boiler blow-down discharges from the power plant at Discharge Point 015 and combines with cooling tower blow-down for use in the hydraulic rock/wood separator. Water from the rock/wood separator discharges to Discharge Point 017. Discharge Points 015 and 017 discharge directly or indirectly to a 20-acre storage pond, which then discharges through a clarifier and out Discharge Point 003 to the Eel River, a water of the United States within the Scotia Hydrologic Sub area of the Eel River Watershed.

4. Section IV.A.5.a and 7.a of the 2012 Order contains, in part, the following effluent limitations for Discharge Points 015 and 017.

Parameter	Units	Effluent Limitations	
		Average Monthly	Maximum Daily
Total Suspended Solids	mg/l	30	100

5. The Monitoring and Reporting Program, Attachment E, Section X, Table E-16 of the 2012 Order contains, in part, the following monitoring periods and reporting schedule with which the Respondent is required to maintain compliance:

Sampling Frequency	Monitoring Period Begins On	Monitoring Period	Self-Monitoring Report (SMR) Due Date
Continuous	July 1, 2012	All	First Day Of Second Calendar Month Following Month Of Sampling
Daily	July 1, 2012	(Midnight Through 11:59 Pm) Or Any 24-Hour Period That Reasonably Represents A Calendar Day For Purposes Of Sampling.	First Day Of Second Calendar Month Following Month Of Sampling
Weekly	July 1, 2012	Sunday Through Saturday	First Day Of Second Calendar Month Following Month Of Sampling

Monthly	July 1, 2012	1st Day Of Calendar Month Through Last Day Of Calendar Month	First Day Of Second Calendar Month Following Month Of Sampling
Semi-Annually	July 1, 2012	January 1 Through June 30 July 1 Through December 31	First Day Of Second Calendar Month Following Month Of Sampling 1
Annually	January 1, 2012	January 1 Through December 31	February 1
1x / 5 Years	July 1, 2012	October 1 Through May 15	First Day Of Second Calendar Month Following Month Of Sampling, to be submitted no later than June 30, 2016

6. North Coast Water Board staff contacted the Respondent by email on December 17, 2024, October 21 and 23, 2025, January 21, 2026, and February 4 and 25, 2026 regarding late reporting and potential associated liability. Staff also reiterated the requirement for timely submittal of monitoring reports during an NPDES Facility inspection on 10/30/2025 and again during a videoconference with the Respondent on February 5, 2026. The purpose of this videoconference was to provide technical assistance and address the Respondent's questions regarding reporting obligations. Despite these notifications and the compliance assistance provided, the Respondent has not taken adequate corrective action to ensure the timely submittal of Self-Monitoring Reports (SMRs).
7. On April 9, 2026, the North Coast Water Board issued a Notice of Violation (NOV) to the Respondent. The specific violations in the NOV included eleven effluent limitation violations for daily maximum and monthly average Total Suspended Solids (TSS) that occurred from January 3, 2023, through February 25, 2025 and twenty-one late reporting violations for delinquent SMRs from October 2, 2024, through April 2, 2026.
8. On April 13, 2026 the Respondent submitted SMRs for September 2025, October 2025, November 2025, December 2025, and January 2026.

ALLEGATIONS:

9. SMRs submitted by the Respondent between January 3, 2024, and February 26, 2026, indicate the Respondent violated the above-referenced Total Suspended Solids monthly average effluent limitations on ten occasions and daily maximum effluent limitations on one occasion, as identified in Exhibit A. Eight of the eleven alleged violations are not exempt from MMPs. Of the eight, six of the alleged violations are classified as “serious violations” pursuant to Water Code section 13385(h)(2).

Additionally, between October 2, 2024 and April 24, 2026, the Respondent failed to submit 20 discharge monitoring reports within 30 days of the deadline to submit the reports as required by the 2012 Order and identified in Exhibit B. Each of the 20 required reports were submitted between 42 to 366 days late, which subjects the Respondents to a MMP of \$3,000 for each complete period of 30 days pursuant to Water Code section 13385.1(a)(1). Due to an alleged delay reported by the Respondent in approving a Legally Responsible Official (LRO) who is in charge of submitting SMRs, the North Coast Water Board has used its discretion to reduce the number of days late for violations 1-9 in Exhibit B.

Exhibits A and B are attached, hereto, and are incorporated, herein, by this reference. This Complaint only addresses administrative civil liability for the violations specifically identified in Exhibits A and B, which are subject to MMPs under Water Code section 13385(h) and/or (i).

LEGAL PROVISIONS UPON WHICH LIABILITY IS BASED:

10. Water Code section 13376 prohibits the discharge of pollutants in violation of effluent limitations set forth in WDRs.
11. Water Code section 13385(h)(1), requires the North Coast Water Board to assess a MMP of three thousand dollars (\$3,000) for each serious violation.
12. Water Code section 13385(h)(2) defines a “serious violation” as “any waste discharge that violates the effluent limitations contained in the applicable [WDRs] for a Group II pollutant, as specified in Appendix A to Section 123.45 of Title 40 of the Code of Federal Regulations, by 20 percent or more or for a Group I pollutant, as specified in Appendix A to Section 123.45 of Title 40 of the Code of Federal Regulations, by 40 percent or more.”
13. Water Code section 13385(i)(1) also requires the North Coast Water Board to assess a MMP of three thousand dollars (\$3,000) for each violation, not counting the first three (3) violations, if the Respondent does any of the following four (4) or more times in a period of six (6) consecutive months:
 - 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; or

- d. Violates a toxicity effluent limitation contained in the applicable WDRs where the WDRs do not contain pollutant-specific effluent limitations for toxic pollutants.
14. Water Code section 13385(i)(2) defines a “period of six consecutive months” as “the period commencing on the date that one of the violations described in this subdivision occurs and ending 180 days after that date.”
15. Water Code section 13385.1(a)(1) also defines a “serious violation” as a failure to file a discharge monitoring report required pursuant to Water Code section 13383 for each complete period of 30 days following the deadline for submitting the report, if the report is designed to ensure compliance with limitations contained in WDRs that contain effluent limitations.

PROPOSED ADMINISTRATIVE CIVIL LIABILITY ASSESSMENT:

16. The Assistant Executive Officer proposes that the Respondent be assessed an Administrative Civil Liability penalty of two hundred fifty-five thousand dollars (\$255,000) for exceeding the daily maximum and monthly average effluent limitations for TSS and submitting late discharge monitoring reports, as identified in Exhibits A and B.

THE RESPONDENT IS HEREBY GIVEN NOTICE THAT:

17. The North Coast Water Board will hold a hearing on this Complaint on a date proposed by the North Coast Water Board Advisory Team, likely on August 5-6, 2026. The Procedures for all parties to follow for this hearing are included, herein (Hearing Procedures). A form to waive the right to a hearing-within-90-days is also included, herein (Waiver Form). The meeting is tentatively scheduled to take place in the town of Crescent City, Del Norte County, California, at a location to be announced, or at a location posted on the North Coast Water Board’s website, unless the Respondent does one of the following by the deadline to submit the Waiver Form (Attachment C).
 - a. Waive the right to a hearing before the North Coast Water Board and pay the proposed MMP of **\$255,000** in full;
 - b. Waive the right to a hearing-within-90-days before the North Coast Water Board after service of this Complaint to engage the North Coast Water Board Prosecution Team in settlement negotiations; or
 - c. Waive the right to a hearing-within-90-days before the North Coast Water Board after service of this Complaint to extend the hearing date and/or hearing deadlines and allow additional time to prepare for hearing.
18. To select one of the waiver options identified above, the Respondent must complete the enclosed Waiver Form and submit it to the North Coast Water Board Advisory Team. If the Respondent has questions about the Waiver Form

or wishes to request an extension to the deadline, they should contact the North Coast Water Board Advisory Team.

All submittals and communications to the Advisory Team shall be sent to:

Advisory Team

Valerie Quinto
Executive Officer
Regional Water Quality Control Board
North Coast Region
Valerie.Quinto@waterboards.ca.gov

Nathan Jacobsen
Attorney IV
Office of Chief Counsel
State Water Resources Control Board
(916) 341-5181
Nathan.Jacobsen@waterboards.ca.gov

Bayley Toft-Dupuy
Attorney III
Office of Chief Counsel
State Water Resources Control Board
(916) 341-5165
Bayley.Toft-Dupuy@waterboards.ca.gov

19. If a hearing is held, it will be governed by the Notice of Public Hearing and Hearing Procedures that will be provided by the North Coast Water Board Advisory Team.
20. During the hearing, the North Coast Water Board will hear testimony and arguments and affirm, reject, or modify the proposed MMP amount, or determine whether to refer the matter to the Attorney General for recovery of judicial civil liability.
21. Issuance of this Complaint is an enforcement action and is, therefore, exempt from the California Environmental Quality Act (Pub. Resources and Code section 21000 *et seq.*), pursuant to California Code of Regulations, title 14, section 15321, subdivision (a)(2).

Claudia E. Villacorta, P.E.
Assistant Executive Officer

Attachments:

- A. Exhibit A: List of Effluent Limitation Violations Requiring Mandatory Minimum Penalties
- B. Exhibit B: List of Late Reporting Violations Requiring Mandatory Minimum Penalties
- C. Hearing Waiver Form for Administrative Civil Liability Complaint
- D. Hearing Procedures

MANDATORY PENALTY ADMINISTRATIVE CIVIL LIABILITY

Humboldt Sawmill Company

Scotia Sawmill and Cogeneration Plant

WDID No. NPDES No. CA0006017
1B83104OHUM
EXHIBIT "A"

Effluent Limitation Violations Requiring Mandatory Minimum Penalties

#	Violation Number	Violation Date	Constituent	Pollutant Group	Limitation Period	Limit	Result/Average	Units	Exempted from MMP?	Exempt Reason	% Over Limit	Date 180 Days Prior	Serious or Chronic Violation?	No. of Violations within 180 days	Mandatory Fine?	Water Code	Penalty
1	1113924	01/03/2023	Total Suspended Solids	Group 1	Monthly Average	30	49.3	mg/L	N		64%	07/07/2022	S	N/A	Y	13385(h)	\$ 3,000
2	1124740	01/30/2024	Total Suspended Solids	Group 1	Monthly Average	30	33.4	mg/L	N	a	11%	08/03/2023	N/A	1	N		\$ 0
3	1125391	02/09/2024	Total Suspended Solids	Group 1	Monthly Average	30	40	mg/L	N	a	33%	08/13/2023	N/A	2	N		\$ 0
4	1126789	03/20/2024	Total Suspended Solids	Group 1	Monthly Average	30	34	mg/L	N	a	13%	09/22/2023	N/A	3	N		\$ 0
5	1128216	04/29/2024	Total Suspended Solids	Group 1	Monthly Average	30	38	mg/L	N		27%	11/01/2023	C	4	Y	13385(i)	\$ 3,000
6	1129055	05/31/2024	Total Suspended Solids	Group 1	Monthly Average	30	41	mg/L	N		37%	12/03/2023	C	5	Y	13385(i)	\$ 3,000
7	1143752	08/21/2024	Total Suspended Solids	Group 1	Daily Maximum	100	2200	mg/L	N		2100%	02/23/2024	S	N/A	Y	13385(h)	\$ 3,000
8	1149285	01/28/2025	Total Suspended Solids	Group 1	Monthly Average	30	59	mg/L	N		97%	08/01/2024	S	N/A	Y	13385(h)	\$ 3,000
9	1149286	02/25/2025	Total Suspended Solids	Group 1	Monthly Average	30	42	mg/L	N		40%	08/29/2024	S	N/A	Y	13385(h)	\$ 3,000
10	1149287	07/30/2025	Total Suspended Solids	Group 1	Monthly Average	30	70	mg/L	N		133%	01/31/2025	S	N/A	Y	13385(h)	\$ 3,000
11	1153160	02/26/2026	Total Suspended Solids	Group 1	Monthly Average	30	47	mg/L	N		56%	08/30/2025	S	N/A	Y	13385(h)	\$ 3,000

Total Penalty: \$ 24,000

Legend of Table

- a. The first three violations in a 180-day period shall not receive MMP assessment unless serious.
b. Violation is not eligible for MMP because it was already included in a previous Enforcement Action. Included in this list to show rolling 180-day count.
Ct. Count – The number that follows represents the number of exceedances in the past 180 days. A count > than Ct. 3 means that a penalty under Water Code Section 13385 (i) applies.

- 1 - Violation occurs on sample date or last date of averaging period.
2 - For Group I pollutants, a violation is serious when the limit is exceeded by 40% or more.
- For Group II pollutants, a violation is serious when the limit is exceeded by 20% or more.
3 - When a serious violation occurs on the same day as a chronic, the serious violation is only assessed an MMP once and is counted last for the day when determining the number of chronic violations to be assessed a penalty.

Violation period ending the last day of January 3, 2023March 2026

Group I Violations Assessed MMP: 11
Group II Violations Assessed MMP: 0
Other Effluent Violations Assessed MMP: 0
Violations Exempt from MMP: 3
Total Violations Assessed MMP: 8

Mandatory Minimum Penalty = (6 Serious Violations + 2 Non-Serious Violations) x \$3,000 = \$24,000

MANDATORY PENALTY ADMINISTRATIVE CIVIL LIABILITY

Humboldt Sawmill Company
 Scotia Sawmill and Cogeneration Plant
 WDID No. 1B83104OHUM
 EXHIBIT "B"

Effluent Limitation Violations Requiring Mandatory Minimum Penalties

	Violation Number	Violation Date	Constituent/Description	Due Date	Date Submitted	Exempted from MMP?	Exempt Reason	Days Late	No. of Serious Violations	Serious or Chronic Violation?	Mandatory Fine?	Water Code	Penalty
1 (a)	1151793	10/02/2024	Monthly SMR for August 2024 was due on 10/01/2024	10/01/2024	01/01/2025	No	No (d)	91	3 (a)(c)	S	Y	13385.1	\$9,000
2 (a)	1151794	11/02/2024	Monthly SMR for September 2024 was due on 11/01/2024	11/01/2024	01/01/2025	No	No (d)	60	2 (a)(c)	S	Y	13385.1	\$6,000
3 (a)	1151793	12/02/2024	Monthly SMR for October 2024 was due on 12/01/2024	12/01/2024	01/01/2025	No	No (d)	30	1 (a)(c)	S	Y	13385.1	\$3,000
1 (a)	1151793	10/02/2024	Monthly SMR for August 2024 was due on 10/01/2024 recalculated to 04/23/2025	04/23/2025	05/30/2025	No	No (d)	37	1 (a)(c)	S	Y	13385.1	\$3,000
2 (a)	1151794	11/02/2024	Monthly SMR for September 2024 was due on 11/01/2024 recalculated to 04/23/2025	04/23/2025	05/30/2025	No	No (d)	37	1 (a)(c)	S	Y	13385.1	\$3,000
3 (a)	1151795	12/02/2024	Monthly SMR for October 2024 was due on 12/01/2024 recalculated to 04/23/2025	04/23/2025	05/30/2025	No	No (d)	37	1 (a)(c)	S	Y	13385.1	\$3,000
4	1151796	01/02/2025	Monthly SMR for November 2024 was due on 01/01/2025 recalculated to 04/23/2025	04/23/2025	05/31/2025	No	No (d)	38	1 (b)(c)	S	Y	13385.1	\$3,000
5	1151797	02/02/2025	Monthly SMR for December 2024 was due on 02/01/2025 recalculated to 04/23/2025	04/23/2025	05/31/2025	No	No (d)	38	1 (b)(c)	S	Y	13385.1	\$3,000
6	1151798	03/02/2025	Monthly SMR for January 2025 was due on 03/01/2025 recalculated to 04/23/2025	04/23/2025	11/10/2025	No	No (d)	201	6 (b)(c)	S	Y	13385.1	\$18,000
7	1152782	03/04/2025	Annual SMR for 2024 was due on 03/03/2025 recalculated to 04/23/2025	04/23/2025	4/24/2026	No	No (d)	366	12 (b)(c)	S	Y	13385.1	\$36,000
8	1151799	04/02/2025	Monthly SMR for February 2025 was due on 04/01/2025 recalculated to 04/23/2025	04/23/2025	11/10/2025	No	No (d)	201	6 (b)(c)	S	Y	13385.1	\$18,000
9	1151800	05/02/2025	Monthly SMR for March 2025 was due on 05/01/2025	05/01/2025	11/10/2025	No	No (d)	192	6 (c)	S	Y	13385.1	\$18,000
10	1151801	06/02/2025	Monthly SMR for April 2025 was due on 06/01/2025	06/01/2025	11/10/2025	No	No (d)	161	5 (c)	S	Y	13385.1	\$15,000
11	1151802	07/02/2025	Monthly SMR for May 2025 was due on 07/01/2025	07/01/2025	11/10/2025	No	No (d)	131	4 (c)	S	Y	13385.1	\$12,000
12	1151803	08/02/2025	Monthly SMR for June 2025 was due on 08/01/2025	08/01/2025	11/10/2025	No	No (d)	100	3 (c)	S	Y	13385.1	\$9,000
13	1151804	09/02/2025	Monthly SMR for July 2025 was due on 09/01/2025	09/01/2025	11/10/2025	No	No (d)	69	2 (c)	S	Y	13385.1	\$6,000
14	1151805	10/02/2025	Monthly SMR for August 2025 was due on 10/01/2025	10/01/2025	4/24/2026	No	No (d)	204	6 (c)	S	Y	13385.1	\$18,000
15	1151806	11/02/2025	Monthly SMR for September 2025 was due on 11/01/2025	11/01/2025	04/13/2026	No	No (d)	162	5 (c)	S	Y	13385.1	\$15,000
16	1151807	12/02/2025	Monthly SMR for October 2025 was due on 12/01/2025	12/01/2025	04/13/2026	No	No (d)	132	4 (c)	S	Y	13385.1	\$12,000
17	1151808	01/02/2026	Monthly SMR for November 2025 was due on 01/01/2026	01/01/2026	04/13/2026	No	No (d)	101	3 (c)	S	Y	13385.1	\$9,000
18	1153000	02/02/2026	Monthly SMR for December 2025 was due on 02/01/2026	02/01/2026	04/13/2026	No	No (d)	70	2 (c)	S	Y	13385.1	\$6,000
19	1153002	03/02/2026	Monthly SMR for January 2026 was due on 03/01/2026	03/01/2026	04/13/2026	No	No (d)	42	1 (c)	S	Y	13385.1	\$3,000
20	1152779	03/03/2026	Annual SMR for 2025 was due on 03/02/2026	03/02/2026	4/24/2026	No	No (d)	52	1 (c)	S	Y	13385.1	\$3,000
Total													\$231,000

Legend of Table

- a. The penalty for this violation was calculated for two distinct time periods: number of days late in 2024 using a Date Submitted as 1/1/2025, and number of days late from 4/23/2025 to the actual date the report was submitted, 5/30/2025. This discretionary calculation is due to an alleged delay in approving the LRO.
- b. The Due Date for this violation was recalculated to 4/23/2025 because of an alleged delay in approving the LRO.
- c. Water Code section 13385.1. [Definitions of "serious violation" and "effluent limitation"] (a) (1) For the purposes of subdivision (h) of Section 13385, a "serious violation" also means a failure to file a discharge monitoring report required pursuant to Section 13383 for **each complete period of 30 days** following the deadline for submitting the report, if the report is designed to ensure compliance with limitations contained in waste discharge requirements that contain effluent limitations.
- d. Water Code sections 13385.1(a)(2) and (b) specify conditions where violations associated with a report more than 30 days past due will not be considered "serious," and subject to Mandatory Minimum Penalties. Applicable conditions have not been met for any of the violations cited herein.

Violation Period Between October 1, 2024 and April 24, 2026

Late Reporting Violation Assessed MMP: 77

Violations Exempt from MMP: 0

Total Violations Assessed MMP: 77

Mandatory Minimum Penalty = (77 Serious Violations) x \$3,000 = \$231,000

North Coast Regional Water Quality Control Board

ATTACHMENT C

WAIVER FORM

FOR ADMINISTRATIVE CIVIL LIABILITY COMPLAINT NO. R1-2026-0023

By signing this waiver, I affirm and acknowledge the following:

I am duly authorized to represent Humboldt Sawmill Company, LLC (Respondent) in connection with Administrative Civil Liability Complaint No. R1-2026-0023 (Complaint). I am informed that California Water Code section 13323, subdivision (b), states that, “a hearing before the regional board shall be conducted within 90 days after the party has been served with the complaint. The person(s) who have been issued a complaint may waive the right to a hearing.”

- OPTION 1: Check here if the Dischargers waive the hearing requirement and will pay the liability in full.**
- a. I hereby waive any right the Dischargers may have to a hearing before the North Coast Regional Water Quality Control Board (North Coast Water Board).
 - b. I certify that the Dischargers will remit payment for the proposed civil liability in the full amount of **two hundred fifty-five thousand dollars (\$255,000)** by submitting a check that references “ACL Complaint No. R1-2026-0023” made payable to the State Water Pollution Cleanup and Abatement Account and mailed to Attn: ACL Payment Accounting Office, P.O. Box 1888, Sacramento, California, 95812-1888, with a copy of the check sent to the North Coast Water Board at northcoast@waterboards.ca.gov within 30 days from the date on which this waiver is executed.
 - c. I understand the payment of the above amount constitutes a proposed settlement of the Complaint, and that any settlement will not become final until after a 30-day public notice and comment period. Should the North Coast Water Board receive significant new information or comments from any source (excluding the North Coast Water Board’s Prosecution Team) during this comment period, the North Coast Water Board’s Assistant Executive Officer may withdraw the Complaint, return payment, and issue

a new Complaint. I understand that this proposed settlement is subject to approval by the North Coast Water Board, and that the North Coast Water Board may consider this proposed settlement in a public meeting or hearing. I also understand that approval of the settlement will result in the Dischargers having waived the right to contest the allegations in the Complaint and the imposition of civil liability.

- d. I understand that payment of the above amount is not a substitute for compliance with applicable laws and that continuing violations of the type alleged in the Complaint may subject the Dischargers to further enforcement, including additional civil liability.

OPTION 2: Check here if the Dischargers waive the 90-day hearing Requirement to engage in settlement discussions.

- a. I hereby waive any right the Dischargers may have to a hearing before the Regional Water Board within 90 days after service of the Complaint, but I reserve the ability to request a hearing in the future. I certify that the Dischargers will promptly engage the North Coast Water Board Prosecution Team in settlement discussions to attempt to resolve the outstanding violation(s). By checking this box, the Dischargers request that the North Coast Water Board delay the hearing so that the Dischargers and the Prosecution Team can discuss settlement. It remains within the discretion of the North Coast Water Board to agree to delay the hearing. Any proposed settlement is subject to the conditions described above under “Option 1.” In these discussions, the Dischargers may raise settlement options, including a Supplemental Environmental Project(s), that meets the State Water Resources Control Board’s requirements. Copies of the State Water Resources Control Board’s 2024 Water Quality Enforcement Policy and 2018 Policy on Supplemental Environmental Projects, are available at:

https://www.waterboards.ca.gov/water_issues/programs/enforcement/docs/2024/2024-enforcement-policy.pdf

and

https://www.waterboards.ca.gov/water_issues/programs/enforcement/docs/seps/20180503_sep_policy_amd.pdf

OPTION 3: Check here if the Dischargers waive the 90-day hearing requirement in order to extend the hearing date and/or hearing deadlines. Attach a separate sheet with the amount of additional time requested and the rationale.

- a. I, hereby, waive any right the Dischargers may have to a hearing before the North Coast Water Board within 90 days after service of the Complaint. By checking this box, the Dischargers request that the North Coast Water Board

delay the hearing and/or hearing deadlines so that the Dischargers may have additional time to prepare for the hearing or otherwise resolve this matter including through settlement discussions with the Prosecution Team. I understand that it remains within the discretion of the North Coast Water Board to approve the extension.

Humboldt Sawmill Company, LLC

(Print Name)

(Signature)

(Date)