

REPORT TO THE LEGISLATURE

Per California Water Code Chapter 5.5 Section 13385 (n) Enforcement Activities of the Regional Water Quality Control Boards -2001

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 (n) of the California Water Code. This report responds to the following provision:

13385. Civil Liability

(n)(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.

Report Summary

This report details the violations of waste discharge requirements for discharges to surface water and the formal and informal enforcement actions for those violations. The report focuses on discharges to surface water because it has been prepared pursuant to Chapter 5.5 of the California Water Code. This chapter applies to implementation of the provisions of the Federal Water Pollution Control Act, which establishes a permit program for discharges to surface water only.

Some of the major findings of this report regarding violations and enforcement actions are:

- A 20 percent reduction in the total number of NPDES violations from the previous year.
- A 40 percent reduction in the total number of significant NPDES violations from the previous year.
- Sixty-eight percent of the violations during this reporting period are from facilities that discharge municipal/domestic waste; these facilities account for only 16 percent of the total number of facilities.

- Special Districts and Cities account for a disproportionate share of the recorded violations. Special Districts had 28 percent of the violations and constitute 9 percent of the discharger population. Cities had 32 percent of the violations and constitute 13 percent of the discharger population.
- Enforcement response to violations by the Regional Water Quality Control Boards is essentially the same as the previous year with only a slight increase of 6 percent for violations receiving no enforcement response.
- The NPDES permit processing time for renewing and revising permits more than doubled for permits adopted after January 1, 2000. Two events took place in 2000 that may have effected the permit processing time: (1) the SWRCB adopted the State Implementation Plan for the California Toxics Rule, and (2) implementation of Mandatory Minimum Penalties (MMPs). Water Code Section 13385 was modified by SB 709 to require the issuance of MMPs after January 1, 2000 for (1) “serious violations” and (2) when 4 or more violations have occurred in a 6-month period.

This report also contains an analysis of current enforcement policies, and current progress that is being made towards revisions of the SWRCB’s Enforcement Policy.

Violations and Enforcement Actions

Tracking Violations and Enforcement Actions

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

Violations of Waste Discharge Requirements

The violations enumerated in this report consist of those 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 lie within different watersheds and are as follows (see Attachment

No. 1 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
- Region 6 – Lahontan RWQCB
- Region 7 – Colorado River Basin RWQCB
- Region 8 – Santa Ana RWQCB
- Region 9 – San Diego RWQCB

Statewide there are 2037 facilities with NPDES Waste Discharge Requirements. These facilities are divided into two distinct categories:

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

A summary of active NPDES facilities by category and RWQCB as of January 12, 2002, is shown in the table below.

NPDES FACILITIES			
REGION	MAJORS	MINORS	TOTAL
1	15	46	61
2	62	213	275
3	21	58	79
4	49	645	694
5	59	227	286
6	3	33	36
7	13	50	63
8	21	422	443
9	35	65	100
TOTAL	278	1759	2037

This report addresses violations occurring from January 1, 2001 through December 31, 2001. However, the data for the fourth quarter are incomplete. The schedule for this report does not permit inclusion of most discharger self-monitoring reports, the principal measure that reveals violations, covering this final quarter. Typically, self-monitoring reports are due to the RWQCB 30 to 45 days after the end of the month for which the monitoring was done to allow for laboratory analysis and transmittal of data. Added to this can be up to another 30 to 60 days for review of the submitted reports by the RWQCBs. As a result of these time lags, the violations which occurred in October are often not known and recorded in the tracking database until the following January.

There were a total of 3,022 violations in 2001 recorded in the database as of January 10, 2002. This compares with 3,798 violations for 2000 as reported in last year's analysis. This constitutes a 20 percent reduction in the number of violations for a similar period. The table below breaks the violations for 2001 out by Region and quarter.

Violations of NPDES Waste Discharge Requirements					
Region	Qtr 1 1/1/01 - 3/31/01	Qtr 2 4/1/01 - 6/30/01	Qtr 3 7/1/01 - 9/30/01	Qtr 4* 10/1/01 - 12/31/01	Total for 2001
1	137	97	38	17	289
2	116	82	44	10	252
3	77	55	226	41	399
4	245	82	11	1	339
5	288	244	140	45	717
6	3	9	32	9	53
7	78	91	96	37	302
8	177	110	27	45	359
9	141	55	54	62	312
Totals	1,262	825	668	267	3,022

* Note that as mentioned above, the data for the fourth quarter was incomplete at the time this report was prepared.

A comparison of the number of violations by Region and the number of facilities regulated in that Region is provided in the table below. The data indicate an uneven distribution of violations among the different Regions when compared to their associated percentage of facilities. The reasons for this inconsistency are unknown at this time. The SWRCB recognizes the need to investigate these inconsistencies and will endeavor to find the causes.

Number of Facilities Compared to Number of NPDES Violations				
Region	NPDES Facilities	Percentage of Facilities	Total Violations	Percentage of Violations
1	61	2.99%	289	9.56%
2	275	13.50%	252	8.34%
3	79	3.88%	399	13.20%
4	694	34.07%	339	11.22%
5	286	14.04%	717	23.73%
6	36	1.77%	53	1.75%
7	63	3.09%	302	9.99%
8	443	21.75%	359	11.88%
9	100	4.91%	312	10.32%
Total	2,037		3,022	

For the NPDES program, facility waste types are generally broken into three categories:

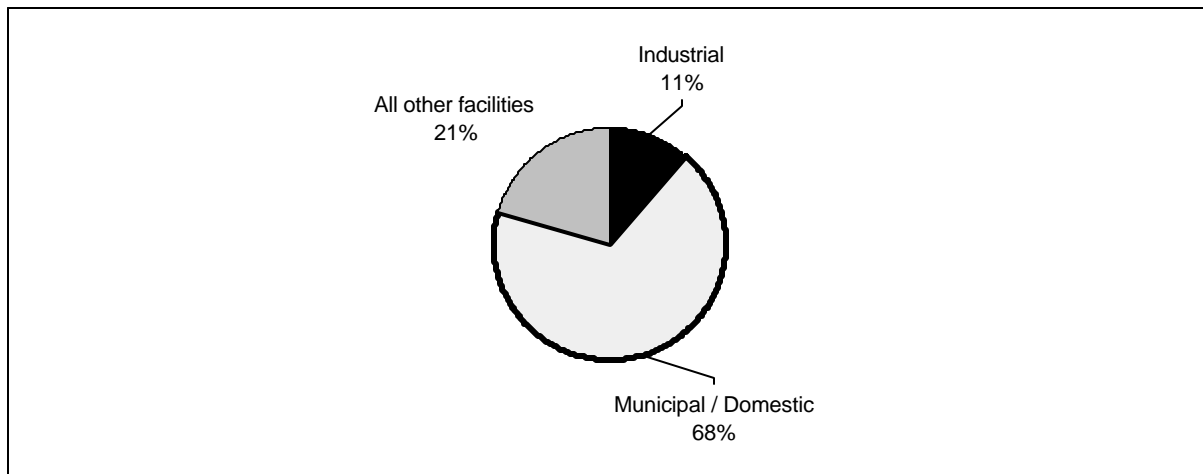
- Industrial wastes – includes industrial discharges that are primarily from industrial processes,
- Municipal/Domestic wastes – includes facilities that treat domestic and municipal wastes, and
- All other facilities under permit and not in a category above.

NPDES violations for 2001 are displayed by Region and type of Facility in the table below.

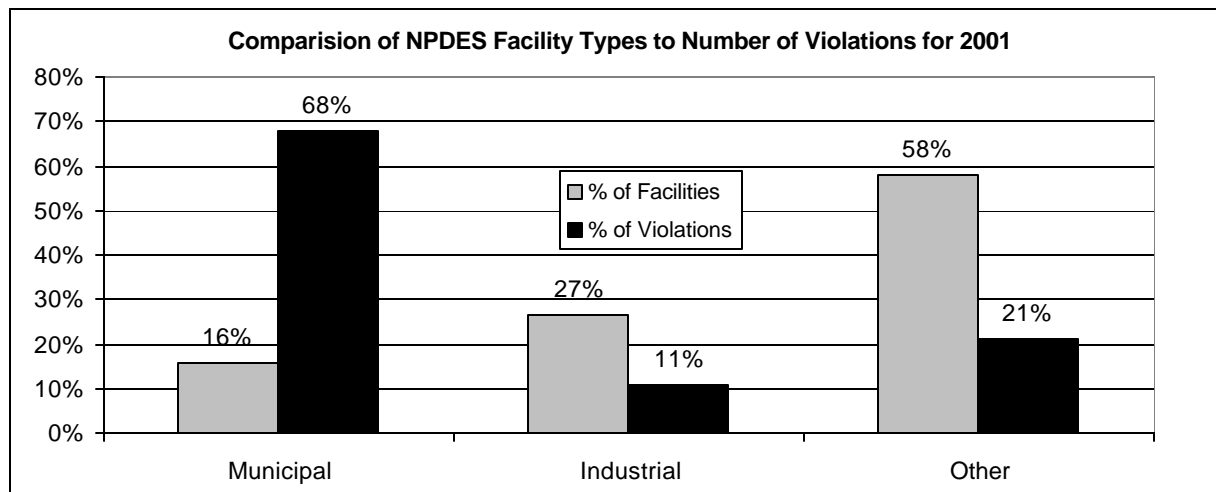
NPDES Violations by Facility Waste Type				
	Industrial	Municipal / Domestic	All other facilities	Total
1	19	267	3	289
2	17	174	61	252
3	16	373	10	399
4	69	47	223	339
5	119	547	51	717
6	4	8	41	53
7	17	264	21	302
8	55	246	58	359
9	30	130	152	312
Total	346	2056	620	3022
Percent of Total	11%	68%	21%	

The chart below shows the breakdown of violations for each facility waste type for the whole State. The overwhelming majority of violations statewide occurred at Municipal/Domestic facilities.

Violations by Facility Waste Type



Municipal waste facilities account for approximately 16 percent of the NPDES facilities overall. The chart below indicates that municipal waste facilities' violations represent a disproportionate percentage of the total violations.



Violations can also be broken out by the type of agency. The following types of agencies are tracked in the SWIM database:

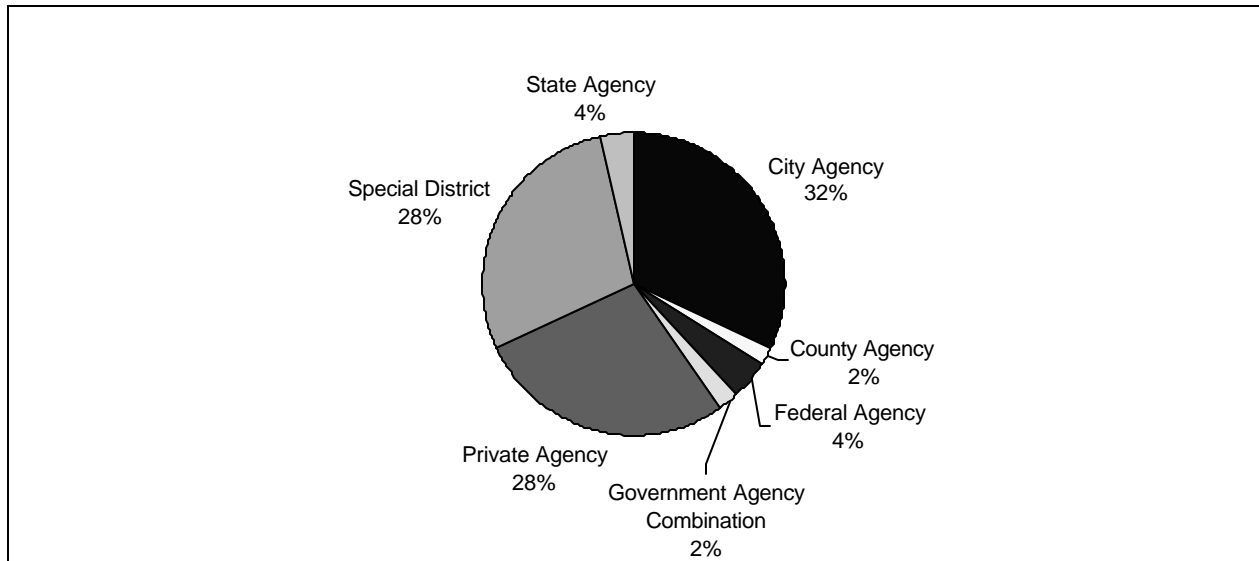
- City Agencies
- Special Districts
- County Agencies
- State Agencies
- Federal Agencies
- Government Agency Combinations
- Private Agencies

The table below shows the violations by agency type and Region for 2001.

NPDES Violations by Agency Type								
	City Agency	County Agency	Federal Agency	Government Agency Combination	Private Agency	Special District	State Agency	Total
1	137	0	0	0	22	130	0	289
2	108	17	2	0	75	50	0	252
3	224	0	0	33	58	33	51	399
4	120	10	3	3	191	6	6	339
5	192	20	1	0	184	285	35	717
6	1	3	0	0	35	9	5	53
7	87	0	12	0	65	135	3	302
8	61	10	1	26	87	170	4	359
9	34	2	109	0	123	40	4	312
Total	964	62	128	62	840	858	108	3,022

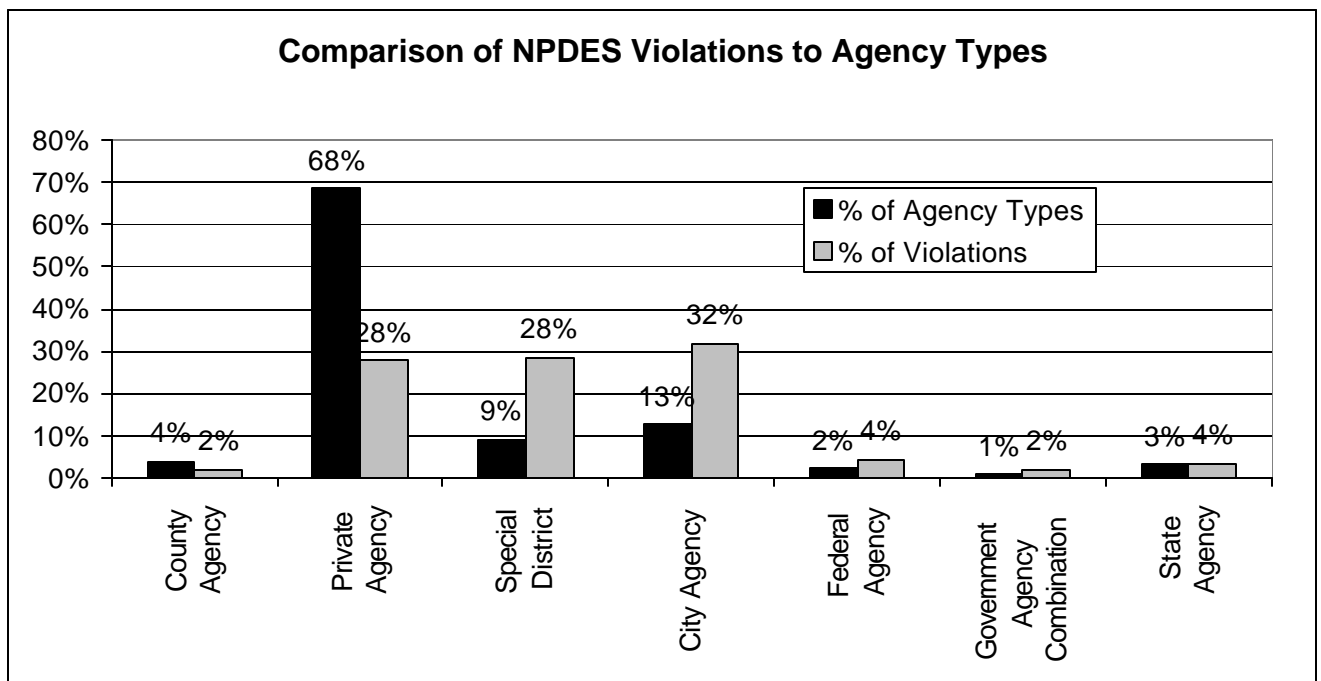
The breakdown of violations by each agency type is displayed in the chart below. The violation data indicate that municipal or government agency types (Special Districts, Cities, State Agencies, County Agencies, Federal Agencies, and Government Agency combinations) account for 72 percent of the NPDES violations.

NPDES Violations by Agency Type



A comparison of the percentage of violations for each type of agency to the percentage of facilities of that agency type is presented below. Both Special Districts and City Agencies account for a disproportionate share of violations.

Comparison of NPDES Violations to Agency Types



An important distinction to consider when evaluating the violation data presented above is that not all violations are equivalent. Violations vary from not submitting monitoring reports to acute toxicity violations. The RWQCBs also make a distinction for each violation on whether it is considered significant. Significant violations are defined by the State Board's Water Quality Enforcement Policy (Resolution No. 96-030, as amended by Resolution No. 97-085). A breakdown of the violation types and the number of those violations that were significant is presented in the table below. A more detailed description of each violation category is provided in Attachment No. 2.

NPDES Violations by Category for 2001					
Description of Violation Category	Total Violations		Significant Violations		
	Number	%	Number	% of Total Significant	% of Total Violations
Category 1 Pollutant	861	28.5%	350	62.4%	11.6%
Other Effluent Violation	677	22.4%	29	5.2%	1.0%
Failure to submit Reports or Report is Deficient	670	22.2%	5	0.9%	0.2%
Category 2 Pollutant	290	9.6%	171	30.5%	5.7%
Violation of Non-Effluent Permit Condition	228	7.5%	1	0.2%	0.0%
Sanitary Sewer Overflow	147	4.9%	2	0.4%	0.1%
Acute Toxicity	52	1.7%		0.0%	0.0%
Basin Plan Prohibition	32	1.1%		0.0%	0.0%
Unregulated Discharge	28	0.9%		0.0%	0.0%
Failure to Pay Fees	16	0.5%		0.0%	0.0%
Chronic Toxicity	9	0.3%	2	0.4%	0.1%
Compliance Schedule	5	0.2%		0.0%	0.0%
Failure to Notify Per Requirement	4	0.1%		0.0%	0.0%
Failure to Obtain Permit	2	0.1%	1	0.2%	0.0%
Previous Enforcement Action	1	0.0%		0.0%	0.0%
Total	3022	100%	561	100%	18.6%

Enforcement Actions Taken

Enforcement actions taken as a result of a violation are classified as either informal or formal. Informal enforcement actions are generally actions taken at the staff level. Formal enforcement actions generally consist of Board actions or actions taken by the Executive Officer.

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 Regional or State Board.	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 Regional Board is a party.	Formal
Waste Discharge Requirements	Any modification or rescission of Waste Discharge Requirements in response to a violation.	Formal

Enforcement actions recorded in the SWIM database are linked to specific violations. It is important to recognize that one enforcement action is often in response to multiple violations. The SWRCB's Enforcement Policy also establishes a progressive enforcement approach. This

means some violations may first receive an informal enforcement action which, if not responded to, is followed by a formal enforcement action at a later time. The table below shows the number of violations for each quarter and the total for 2001. It compares this with the number of violations that did not receive any enforcement action, the number of violations that received an informal enforcement action, and the number of violations that received 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 as discussed above.

NPDES Violations Compared to Enforcement Actions																				
Region	Qtr 1				Qtr 2				Qtr 3				Qtr 4*				Total for 2001			
	1/1/01 - 3/31/01				4/1/01 - 6/30/01				7/1/01 - 9/30/01				10/1/01 - 12/31/01							
	Total Violations	Violations without Enforcement Actions	Violations with Informal Enforcement Actions	Violations with Formal Enforcement Actions	Total Violations	Violations without Enforcement Actions	Violations with Informal Enforcement Actions	Violations with Formal Enforcement Actions	Total Violations	Violations without Enforcement Actions	Violations with Informal Enforcement Actions	Violations with Formal Enforcement Actions	Total Violations	Violations without Enforcement Actions	Violations with Informal Enforcement Actions	Violations with Formal Enforcement Actions	Total Violations	Violations without Enforcement Actions	Violations with Informal Enforcement Actions	Violations with Formal Enforcement Actions
1	137	50	65	22	97	29	68	0	38	2	36	0	17	12	5	0	289	93	174	22
2	116	55	37	24	82	50	12	20	44	38	6	0	10	9	1	0	252	152	56	44
3	77	43	11	23	55	33	15	7	226	154	68	5	41	36	3	2	399	266	97	37
4	245	0	245	13	82	2	79	1	11	1	9	1	1	0	1	0	339	3	334	15
5	288	92	161	66	244	132	102	20	140	86	55	4	45	31	17	0	717	341	335	90
6	3	1	2	0	9	5	3	1	32	5	20	7	9	3	5	1	53	14	30	9
7	78	30	39	18	91	44	16	44	96	23	27	51	37	35	1	1	302	132	83	114
8	177	93	41	48	110	98	12	4	27	20	7	1	45	6	43	0	359	217	103	53
9	141	40	98	19	55	5	48	20	54	10	44	2	62	15	47	0	312	70	237	41
Totals	1262	404	699	233	825	398	355	117	668	339	272	71	267	147	123	4	3022	1288	1449	425
Percentages		32%	55%	18%		48%	43%	14%		51%	41%	11%		55%	46%	1%		43%	48%	14%

* Note that as mentioned above, the data for the fourth quarter was incomplete at the time this report was prepared.

A comparison of the statewide totals for this reporting period and the last reporting period for NPDES violation and enforcement actions is shown below. The data indicate there has been essentially little change in the response rate to violations with only a slight increase of 6 percent for violations with no enforcement response. Violations with informal enforcement actions decreased by 5 percent and violations with formal enforcement actions decreased by 1 percent.

Comparison of NPDES Violations and Enforcement Actions for 2000 and 2001																				
	Qtr 1				Qtr 2				Qtr 3				Qtr 4*				Total for Year			
	Total Violations	Violations without Enforcement Actions	Violations with Informal Enforcement Actions	Violations with Formal Enforcement Actions	Total Violations	Violations without Enforcement Actions	Violations with Informal Enforcement Actions	Violations with Formal Enforcement Actions	Total Violations	Violations without Enforcement Actions	Violations with Informal Enforcement Actions	Violations with Formal Enforcement Actions	Total Violations	Violations without Enforcement Actions	Violations with Informal Enforcement Actions	Violations with Formal Enforcement Actions	Total Violations	Violations without Enforcement Actions	Violations with Informal Enforcement Actions	Violations with Formal Enforcement Actions
2000																				
Totals	1894	652	994	363	1138	356	657	161	564	235	310	36	202	154	46	3	3798	1397	2007	563
Percentages		34%	52%	19%		31%	58%	14%		42%	55%	6%		76%	23%	1%		37%	53%	15%
2001																				
Totals	1262	404	699	233	825	398	355	117	668	339	272	71	267	147	123	4	3022	1288	1449	425
Percentages		32%	55%	18%		48%	43%	14%		51%	41%	11%		55%	46%	1%		43%	48%	14%

* Note that as mentioned above, the data for the fourth quarter was incomplete at the time this report was prepared.

Effectiveness of Current Enforcement Policies

Analysis of Current Enforcement Policies

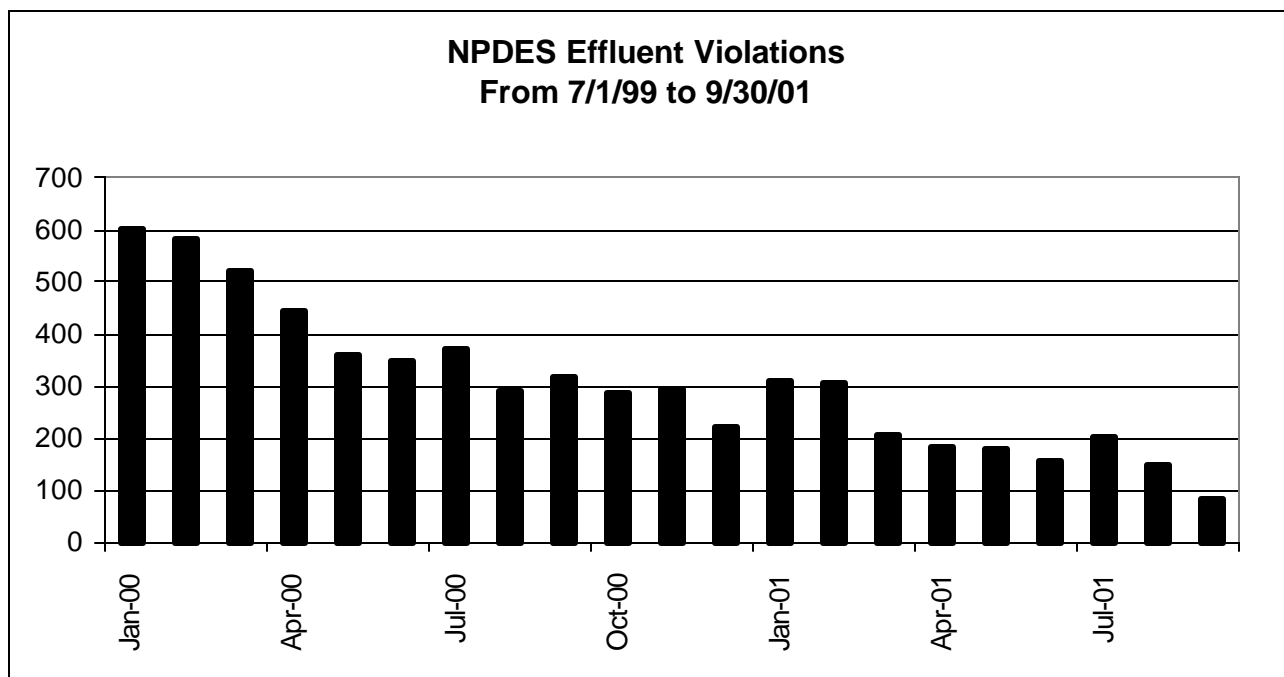
The SWRCB considers two main criteria when evaluating the effectiveness of its current enforcement policies:

- How quickly do out of compliance facilities return to compliance, and
- Is there an overall reduction in the number of violations.

Unfortunately, the SWRCB is not able to directly answer the first question at this time due to a lack of computerized data on violations and enforcement actions in the past. Our current data systems were only brought online in July of 1999 and do not yet hold enough information to provide insight on the effectiveness of the SWRCB's current Enforcement Policies in returning facilities to compliance. As data continues to be entered into SWIM, a trend analysis relating facilities with violations to resulting enforcement actions should be possible.

The second question can be addressed. Currently there appears to be an overall reduction in the number of violations. The number of violations for the previous reporting period, or those violations occurring during the year 2000, was 3798. For the current reporting period, or those violations occurring during the year 2001, the number of violations was 3,022. This is a 20 percent reduction in the overall number of violations for two similar periods.

The chart below plots total violations for each month starting in January 2000 and continuing until September 2001. From January 2000 forward, there is a gradual decrease in the number of violations each month. The precise cause for this decrease has not been determined but it may be the result of increased enforcement actions as a result of Mandatory Minimum Penalties.



The numbers for significant violations show an even greater decline. During the previous reporting period there were 942 significant violations. For the current reporting period there were 561 significant violations. This equates to a 40 percent reduction in the number of significant violations since January 2000.

During the previous reporting period, the SWRCB lacked an adequate data set from which to evaluate overall compliance with Waste Discharge Requirements. To offset this, several small-scale reviews were performed. One of these reviews evaluated eight facilities that were in chronic noncompliance and have received large Mandatory Minimum Penalties (MMP). These 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 facilities actions as a result of the MMP.

This review has been updated for this report and is discussed in the section below.

Analysis of Mandatory Minimum Penalties

The SWRCB and RWQCBs have been implementing the changes to Water Code Section 13385 by SB 709 and SB 2165 since January of 2000. Included in these changes were statutes requiring the issuance of Mandatory Minimum Penalties for (1) “serious violations” and (2) when 4 or more violations have occurred in a 6-month period (chronic violations). A “serious violation” is defined as a violation 40 percent over the limit of a conventional pollutant and 20 percent over the limit of a toxic pollutant (WC Section 13385 references 40 CFR 123.45 for the definitions of pollutant types).

Also included in the statutes are exemptions from receiving a MMP. These exemptions are for facilities that are small communities and for facilities that have Cease and Desist Orders or Time Schedule Orders and meet a strict set of criteria.

Included as Attachment No. 3 is a table that lists those facilities with MMP violations from January 1, 2000 through June 30, 2001. This table also details how many of those violations have received MMPs. The last six months of 2001 are excluded due to the time lag involved in identifying violations and issuing MMPs.

The attached table (Attachment No. 3) lists 256 facilities with 2,976 total MMP violations. Of these facilities, 24 qualify for the exemptions provided by statutes accounting for 373 of the MMP violations. The table also shows that 58 percent of the nonexempt violations, or 1,498 of the MMP violations received an enforcement action and that 60 percent of the nonexempt facilities with MMP violations received enforcement actions. Generally, enforcement actions have not been taken to date for the remaining violations for the following reasons:

- MMP violations are continuing and enforcement action postponed.
- The RWQCBs are issuing MMPs for continuing violators on intervals of between 6 and 12 months.
- Data for MMP violation are being reanalyzed to verify violation.
- Facility is under criminal investigation.
- An Administrative Civil Liability greater than the MMP is being prepared.
- Other higher priority tasks are being completed first.

The summary data regarding NPDES violations generally indicate that MMPs have had a positive effect on compliance. Overall, violation rates are trending down and focused studies indicate that facilities are undertaking measures to return and remain in compliance.

The SWRCB previously selected and gathered detailed information on eight facilities that had received a MMP for violations during the first six months of 2000. These facilities have been reviewed again to determine what, if any, effect the issuance of MMPs has had regarding their compliance status. Two of the facilities previously reported have combined to become one discharger. Of the remaining seven facilities, one has had a moderate increase in compliance after receiving a MMP. The other six facilities have only seen a minor increase in compliance or none at all because of the long-term nature of the fixes required.

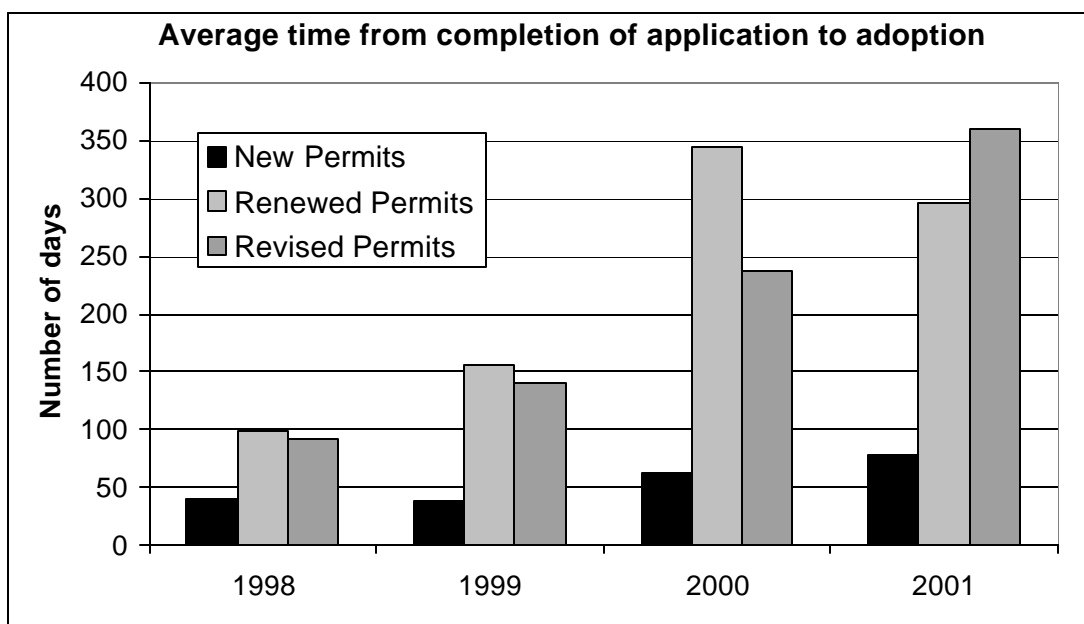
Discharger (Region)	Current overall compliance status	Previously anticipated compliance status after assessment of MMPs¹	Was significant compliance expected by Jan. 2002?¹	Has significant compliance been achieved?
City of Petaluma (2)	Facility has continued to have violations, although at a reduced rate. Making plans for facility upgrade, but this was being prepared for prior to MMPs.	Moderate increase in compliance	Yes	No
Ragged Point Inn (3)	This facility has seen a minor increase of compliance with its effluent flow violations. The facilities effluent quality increased prior to the issuance of MMPs. The permitted flow limit has been increased under a revised permit.	Moderate increase in compliance	Yes	No
California Men's Colony (3)	Assessed two MMPs: one for \$33,000 and the other for \$87,000. Upgrade of the facility is still underway, but substantially complete. Final completion in 2003. Minor increase in compliance has resulted.	Minor increase in compliance	No	No
Pismo Beach (3)	This facility has been issued 2 MMPs; one for \$15,000 and another for \$120,000. Numerous violations have continued until very recently. Another MMP is anticipated. However, very recent indications are that the facility has improved. The facility has undertaken a major upgrade to its treatment facilities, but these will not be complete until 2004.	Minor increase in compliance	No	No
Coachella Sanitary District #2 (7)	This facility has combined with the City of Coachella and is now a single discharger.	Moderate increase in compliance	Yes	N/A
City of Coachella (7)	Violations still continue. Facility renovations are underway and consultant has been retained to investigate cause of violations.	Moderate increase in compliance	Yes	No

Discharger (Region)	Current overall compliance status	Previously anticipated compliance status after assessment of MMPs ¹	Was significant compliance expected by Jan. 2002? ¹	Has significant compliance been achieved?
Centinella State Prison (7)	Facility continues to have violations. Consultant retained to investigate cause of violations with renovations planned.	No change in compliance record	Yes	No
City of Corona (8)	Permit was modified so that the facility is no longer violating its effluent limitations. Facility generally in compliance.	Minor increase in compliance	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.

Increase Processing Time for NPDES Permits

One consequence of MMPs appears to be an increased time required to issue NPDES permits. An analysis of the time required to issue NPDES permits shows that the average time from receipt of a complete application to adoption of the permit by the RWQCB has more than doubled for renewed and revised permits. An increase in the time required for new permits has also occurred, but is not as dramatic. The chart below plots the average times to process an NPDES permit application for the three types of permitting actions.



This increase in permit processing time corresponds to two events that took place in 2000. First, the SWRCB adopted the State Implementation Plan for the California Toxic Rule. The new federal requirements for permits under this rule has likely contributed to the increase in time. The second event is the implementation of MMPs. It appears that since MMPs are based on the effluent limitation contained in a dischargers permit, dischargers are more likely to challenge those limitations in order to reduce their exposure to penalties. While it is not possible to discern

which event has had a greater effect in increasing the permitting time, it is likely that both have contributed.

Recommendations for Improvements to the Enforcement Program

Revision of the State Board Enforcement Policy

The SWRCB is in the final phases of revising its Water Quality Enforcement Policy. The current policy was established by SWRCB Resolution 96-030 "Water Quality Enforcement Policy" and was adopted in order to ensure a consistent approach to water quality enforcement actions throughout the State. This proposed revision addresses recommendations of the SWRCB's Enforcement Order Review Panel, reflects recent statutory changes, and promotes statewide consistency in the enforcement of water quality laws by the State and Regional Water Quality Control Boards.

On January 9, 2001 the SWRCB held a public hearing seeking comments regarding the October 19, 2000 proposed revision of SWRCB Resolution 96-030 (amended by Resolution 97-085) "Water Quality Enforcement Policy". In response to several requests, the public comment period was extended until January 31, 2001. After careful consideration of all comments, SWRCB staff prepared the October 15, 2001, Revised Draft Water Quality Enforcement Policy. A public hearing on the revised draft policy was conducted on January 10, 2002.

The goals of the proposed revised policy include:

1. Integrating policy/guidance with the SWRCB Information Management Strategy (IMS) to better communicate enforcement needs and effectiveness and to improve efficiency.
2. Ensuring more efficient use of standardized permit and enforcement order language.
3. Improving and standardizing violation and enforcement reporting.
4. Establishing procedures for identifying enforcement priorities.
5. Establishing procedures for response to fraudulent reporting or knowingly withholding data.
6. Establishing the process for implementation of specific provisions of SB 709 (1999), SB 2165 (2000), and AB 1664 (2001).
7. Establishing more consistent procedures for staff to use when developing recommendations for ACL amounts. The recommended liabilities include the recovery of economic benefit and the recovery of staff costs.
8. Detailing the available options for payment of liabilities: a) cash payments to the Cleanup and Abatement Account (CAA); b) funding supplemental environmental projects (SEPs) for certain portions of the ACL amount; and c) funding compliance projects for certain avoided costs.
9. Establishing procedures for SEP selection and tracking and defining the public's role in this process.

At the time of this writing it is anticipated that the SWRCB will adopt the revised policy in February 2002.

State Board's Strategic Plan

The SWRCB adopted its revised Strategic Plan on November 15, 2001. One of the Key Strategic Projects contained in this plan is the Compliance Assurance and Enforcement Initiative Project. This Initiative will lay out a plan to achieve measurable and continuing increases in the rate of compliance with state and federal laws.

A key aspect of this will be better data management. Regulators, policy makers, and the public must have improved access to information about violations and enforcement. Better tools must be developed to improve the consistency and cost-effectiveness of compliance determinations and action plans. Also, representative measures of compliance rates are needed in the form of periodic public Compliance Report Cards prepared by the Water Boards.

Improved Data Systems

Improved data management was identified by the SWRCB's Strategic Plan as being fundamental to its future success. Currently the SWRCB is undertaking its SWIM II database project. This project includes several enhancements to the SWIM database that will improve the SWRCB's compliance assurance and enforcement programs. The SWIM II project will continue through the year 2004 with a gradual introduction of features. Several key features of the project in regards to compliance and enforcement are:

- Development of electronic self monitoring reporting (eSMR) whereby dischargers submit data electronically and it is automatically screened for compliance.
- Improved tracking of inspections and the ability to target inspection resources to those areas where they will be most effective.
- Better access to permit data by compliance staff to increase efficiencies.
- Improved tracking of enforcement actions to monitor their results.
- Standardized and automated enforcement order tools to increase efficiencies and improve consistency.

Training for Inspectors and Compliance Staff

The Governor's FY 2001-2002 budget provided resources to undertake a vigorous training program for the SWRCB and RWQCB inspectors and compliance staff. This training is needed to improve the effectiveness of our personnel. The training will also address the large number of new staff due to recent hiring and staff turnover that need technical training in order to perform their job function effectively. These funds are the initial investment in the SWRCB's Water Quality Academy that will be the ultimate vehicle for training our technical staff and educating the public.

The training program will include some courses specifically related to compliance and enforcement activities as well as technical topics that enable staff to better perform their job functions. The following list is a sampling of the training topics being developed:

- Applied technical training to meet Total Maximum Daily Load (TMDL) requirements,
- Basic inspection procedures,
- Industrial storm water inspections,
- Construction storm water inspections,

- Legal training on enforcement actions and application of the Water Code sections on enforcement,
- Immediate spill response protocol for staff,
- Emergency spill response for senior and supervisory staff,
- Review of self monitoring reports and other technical reports,
- Sampling procedures,
- Environmental negotiations training, and
- Pollution prevention.

Continued funding for this wide spectrum of training activities is critical to the SWRCB and the RWQCB being able to effectively meet our mission of protecting water quality and successfully service the regulated community. The Governor's FY 2002-2003 budget proposes continued funding for this important program.

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
 Gray Davis, Governor

California Environmental Protection Agency
 Winston H. Hickox, Secretary

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

LISTING AND DESCRIPTIONS OF VIOLATIONS TYPES USED IN THE SINC AND SWIM DATA SYSTEMS																																													
Violation Type	Description																																												
CAT1	<p>Category 1 pollutant – Category 1 pollutants as defined by USEPA include:</p> <table style="width: 100%; border: none;"> <tr> <td style="width: 60%;"></td> <td style="text-align: center;"><u>Minerals</u></td> </tr> <tr> <td>Oxygen Demand</td> <td>Calcium</td> </tr> <tr> <td>Biochemical Oxygen Demand</td> <td>Chloride</td> </tr> <tr> <td>Chemical Oxygen Demands</td> <td>Fluoride</td> </tr> <tr> <td>Total Organic Carbon</td> <td>Magnesium</td> </tr> <tr> <td>Other</td> <td>Sodium</td> </tr> <tr> <td></td> <td>Potassium</td> </tr> <tr> <td>Solids</td> <td>Sulfur</td> </tr> <tr> <td>Total Suspended Solids (Residues)</td> <td>Sulfate</td> </tr> <tr> <td>Total Dissolved Solids (Residues)</td> <td>Total Alkalinity</td> </tr> <tr> <td>Other</td> <td>Total Hardness</td> </tr> <tr> <td></td> <td>Other Minerals</td> </tr> <tr> <td>Nutrients</td> <td></td> </tr> <tr> <td>Inorganic Phosphorus Compounds</td> <td style="text-align: center;"><u>Metals</u></td> </tr> <tr> <td>Inorganic Nitrogen Compounds</td> <td>Aluminum</td> </tr> <tr> <td>Other</td> <td>Cobalt</td> </tr> <tr> <td></td> <td>Iron</td> </tr> <tr> <td>Detergents and Oils</td> <td>Vanadium</td> </tr> <tr> <td>MBAS</td> <td></td> </tr> <tr> <td>NTA</td> <td></td> </tr> <tr> <td>Oil and Grease</td> <td></td> </tr> <tr> <td>Other detergents or algicides</td> <td></td> </tr> </table>		<u>Minerals</u>	Oxygen Demand	Calcium	Biochemical Oxygen Demand	Chloride	Chemical Oxygen Demands	Fluoride	Total Organic Carbon	Magnesium	Other	Sodium		Potassium	Solids	Sulfur	Total Suspended Solids (Residues)	Sulfate	Total Dissolved Solids (Residues)	Total Alkalinity	Other	Total Hardness		Other Minerals	Nutrients		Inorganic Phosphorus Compounds	<u>Metals</u>	Inorganic Nitrogen Compounds	Aluminum	Other	Cobalt		Iron	Detergents and Oils	Vanadium	MBAS		NTA		Oil and Grease		Other detergents or algicides	
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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>																																												

LISTING AND DESCRIPTIONS OF VIOLATIONS TYPES USED IN THE SINC AND SWIM DATA SYSTEMS	
Violation Type	Description
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.
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 Regional Board as required by permit condition.
PAYF	<u>Failure to pay fees</u> – Failure to pay permit fees. This does not include failure to pay any penalties assed 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.

MMP Violations from 1-1-2000 through 6-30-2001

Region	Agency	Facility	WDID	MMP Violations	Violations Receiving Penalty	Status of MMP for Facility
1	CLOVERDALE, CITY OF	CLOVERDALE CITY WWTP	1B84032OSON	3	0	
	FERNDALE, CITY OF	FERNDALE CITY POTW	1B83136OHUM	19	0	Facility Exempt - Small Community
	FORT BRAGG, CITY OF	FORT BRAGG CITY WWTP	1B84083OMEN	28	0	
	FORTUNA, CITY OF	FORTUNA CITY WWTP	1B83135OHUM	13	0	
	GEORGIA PACIFIC CORPORATION	GP FORT BRAGG SAW	1B84089OMEN	8	0	
	LOLETA CSD	LOLETA POTW	1B80081OHUM	31	9	Facility Exempt - Small Community
	MCKINLEYVILLE CSD	MCKINLEYVILLE WWTP	1B82084OHUM	5	0	Facility Exempt - Small Community
	MENDO CO WWD #2 ANCHOR BAY	MENDOCINO CWWD#2-ANCHOR BAY	1B83118OMEN	12	0	Facility Exempt - Small Community
	REDWAY CSD	REDWAY POTW	1B83147OHUM	3	0	Facility Exempt - Small Community
	SAMOA PACIFIC CELLULOSE. LLC	LP SAMOA PULPMILL	1B77005OHUM	11	0	
	SANTA ROSA DEPT OF PUBLIC WORK	SANTA ROSA CITY WWTP, LAGUNA	1B83099OSON	14	11	
	SONOMA COUNTY WATER AGENCY	SCWA FORESTVILLE CITY CSD	1B83100OSON	18	0	Facility Exempt - Small Community
	SONOMA COUNTY WATER AGENCY	SCWA GRATON CSA NO. 2	1B84060OSON	3	0	
	SONOMA COUNTY WATER AGENCY	SCWA OCCIDENTAL CSD	1B83001OSON	33	0	Facility Exempt - Small Community
	SONOMA COUNTY WATER AGENCY	SCWA RUSSIAN RIVER CSD	1B82045OSON	20	0	Facility Exempt - Small Community
	SONOMA WEST HOLDINGS INC	PLANT #2 FACILITY	1B81202OSON	11	0	
	UC DAVIS	UC BODEGA MARINE LAB	1B84035OSON	2	0	
	UKIAH, CITY OF	UKIAH CITY WWTP	1B84029OMEN	3	0	
Total				237	20	

2	APPLIED MATERIALS INC.	APPLIED MATERIALS.-B81 DEWATER	2 438146001	1	1	MMP Issued
	BENICIA, CITY OF	BENICIA WWTP	2 482001001	11	11	MMP Issued
	BP OIL COMPANY	666 N. SANTA CRUZ LG	2 438416001	1	0	MMP Scheduled
	BP OIL COMPANY	97 S. ABBOTT MILPITAS	2 438498002	1	0	MMP Scheduled
	BURLINGAME, CITY OF	BURLINGAME WWTP	2 417005001	6	6	MMP Issued
	C & H SUGAR	C & H SUGAR WWTP	2 071006001	8	0	MMP Scheduled
	CALIF DEPT OF PARKS & RECR	ANGEL ISLAND STATE PK	2 215002001	18	0	MMP Scheduled
	CALISTOGA, CITY OF	CALISTOGA WW TREATMENT PLANT	2 283003001	2	0	MMP Scheduled
	CENTRAL MARIN SANITATION AG.	CENTRAL MARIN SAN AG.	2 215116001	7	6	MMP Scheduled
	CHEVRON PRODUCTS CO	CHEVRON USA TERMINAL	2 438309001	1	1	MMP Issued
	CHEVRON PRODUCTS CO	2710 Story SJ	2 438349002	1	0	MMP Scheduled
	CHEVRON PRODUCTS CO	6096 Cottle SJ	2 438544001	2	0	MMP Scheduled

Region	Agency	Facility	WDID	MMP Violations	Violations Receiving Penalty	Status of MMP for Facility
	COAST OIL CO.	2075 ALUM ROCK, SJ, BULK PLANT	2 438448002	1	0	MMP Scheduled
	DELTA DIABLO SANITATION DIST.	DELTA DIABLO SANT. DIS	2 071013001	7	7	MMP Issued
	EAST BAY MUNICIPAL UTILITY DIS	ORINDA FILTER PLANT	2 071113001	2	1	MMP Scheduled
	ExxonMobil	1898 N. Capitol SJ	2 438440001	1	0	MMP Scheduled
	ExxonMobil	1610 Tully SJ	2 438411001	1	0	MMP Scheduled
	ExxonMobil	1005 El Camino Sunnyvale	2 438422001	2	0	MMP Scheduled
	ExxonMobil	890 Coleman SJ	2 438395001	1	0	MMP Scheduled
	ExxonMobil	3110 Mt. Vista SJ	2 438451001	1	0	MMP Scheduled
	FAIRFIELD-SUISUN SEWER DISTRCT	SUBREGIONAL WWTP	2 482005001	15	15	MMP Issued
	FMC Corporation	Gate One Annex - 1125 Coleman SJ	2 438520001	1	1	MMP Issued
	GTE Operations Support Inc.	100 Ferguson MV	2 438537001	1	1	MMP Issued
	GENERAL CHEMICAL	GENERAL CHEMICAL WWTP	2 071001001	1	1	MMP Issued
	HANSON AGGREGATES	4501 TIDEWATER AVE, OAKLAND	2 019216001	13	0	MMP Scheduled
	HANSON AGGREGATES	HANSON AGGREGATES	2 386028001	28	0	MMP Scheduled
	HEWLETT PACKARD CO	HP-1501 PMR-BLDGS 1-6	2 438063003	2	1	MMP Scheduled
	JASCO Chemical Corporation	1710 Villa MV	2 438210001	2	2	MMP Issued
	LAS GALLINAS VALLEY S.D.	LAS GALLINAS WWTP	2 215012001	10	10	MMP Issued
	LIVERMORE, CITY OF	LIVERMORE WPCP	2 019025001	3	0	MMP Scheduled
	MALLINCKRODT, INC.	MANSION GROVE APARTMENTS	2 438517001	3	3	
	MARTINEZ REFINING CO	NPD MAJ-FORMER SHELL REFINRY	2 071042001	2	2	MMP Issued
	MOUNTAIN VIEW, CITY OF	SMALL BOAT LAKE	2 438010001	1	0	MMP Scheduled
	MT. VIEW SANITARY DIST	MT. VIEW SANITARY DIST	2 071029001	1	0	MMP Scheduled
	NEC ELECTRONIC INC	NEC ELECTRONIC INC.	2 438162001	2	1	MMP Issued
	NEC ELECTRONIC INC	NEC ELECTRONIC INC.	3 438162001	2	2	MMP Issued
	NOVATO SANITARY DISTRICT	NOVATO AND IGNACIO STP	2 215022001	16	16	MMP Issued
	PACIFICA, CITY OF	PACIFICA WWTP	2 417022001	51	51	MMP Issued
	PACIFICA, CITY OF	CALERA CREEK WWTP	2 417022001	50	9	MMP Scheduled
	PALO ALTO, CITY OF	PALO ALTO REGIONAL WQC PLANT	2 438011001	46	46	MMP Issued
	PETALUMA, CITY OF	PETALUMA WPCP	2 494006001	24	12	MMP Scheduled
	Phillips Petroleum	6211 Santa Teresa	2 438547001	1	1	MMP Scheduled
	PINOLE, CITY OF	CITY OF PINOLE WWTP	2 071032001	9	9	MMP Issued
	REYNOLD SCHWEICKHARDT	2790 HOMESTEAD, SC, L KENNEDY	2 438526002	1	1	
	RICHMOND, CITY OF	RICHMOND WPCP	2 071037001	1	0	
	RODEO SANITARY DISTRICT	RODEO SD STP	2 071039001	10	0	Facility Exempt - Small Community

Region	Agency	Facility	WDID	MMP Violations	Violations Receiving Penalty	Status of MMP for Facility
	SAN FRANCISCO, CITY & CO	BAYSIDE CSO	2 386010003	2	2	MMP Issued
	SAN FRANCISCO, CITY & CO	SOUTHEAST PLANT	2 386010001	3	0	MMP Scheduled
	SAN FRANCISCO, CITY AND CO	SF INT AIRPORT IND WTP	2 417033001	10	0	MMP Scheduled
	SAN FRANCISCO, CITY AND CO	SF INT AIRPORT WQCP	2 417032001	6	1	MMP Scheduled
	SAN JOSE/SANTA CLARA WPCP	SAN JOSE?SANTA CLARA WPCP	2 438014001	3	3	MMP Issued
	SAN MATEO, CITY OF	SAN MATEO WQCP	2 417035001	16	0	MMP Scheduled
	SANTA CLARA CO ROADS & AIRPORT	OREGON EXP UNDERPASS	2 438265001	2	2	
	SAUSALITO-MARIN CITY SAN DIST	SAUSALITO STP	2 215023001	8	8	MMP Issued
	SEWER AUTHORITY MID-COASTSIDE	MAJ-SAM WWTP	2 417068001	17	17	MMP Issued
	SEWERAGE AGENCY OF SO. MARIN	SASM WWTP	2 215015001	2	0	MMP Scheduled
	SONOMA VALLEY COUNTY S. D.	SONOMA VALLEY CNTY SD	2 494009001	44	31	MMP Scheduled
	SOUTH BAYSIDE SYSTEM AUTHORITY	SBSA WWTP	2 417037001	4	0	MMP Scheduled
	SOUTH SAN FRANCISCO STP	S SF/SAN BRUNO WQCP	2 417038001	17	0	MMP Scheduled
	SUNNYVALE, CITY OF	SUNNYVALE STP	2 438018001	8	8	MMP Issued
	TOSCO REFINING COMPANY	901 Ashby Berkeley	2 019255001	2	0	
	TOSCO REFINING COMPANY	TOSCO PORT COSTA PROJECT	2 071204001	2	1	MMP Issued
	TOSCO REFINING COMPANY	TOSCO PORT COSTA PROJECT	2 071204001	2	2	MMP Scheduled
	ULTRAMAR, INC.	ULTRAMAR - AVON REFINERY	2 071048001	5	5	MMP Issued
	UNITED STATES NAVY	TREASURE ISLAND	2 386013001	2	0	MMP Scheduled
	USS-POSCO	USS-POSCO IND	2 071059001	3	3	MMP Issued
	VALLEJO SAN AND FLOOD CONT DIS	VALLEJO SFCD WWTP	2 482012001	13	13	MMP Issued
	WEST COUNTY AGENCY	COMBINED OUTFALL	2 071107001	14	7	MMP Scheduled
	ZENECA INC, WESTERN RESEARCH	ZENECA, RICHMOND PLANT	2 071185001	2	2	MMP Issued
Total				558	322	

3	CA DEPT OF CORRECTIONS	CALIFORNIA MEN'S COLONY	3 400108001	55	45	
	CA STATE PARKS	BIG BASIN WWTP	3 440800001	20	0	Facility Exempt - Small Community
	CARMEL AREA WWD	CARMEL AREA WWTP	3 270101001	4	2	
	CARPINTERIA SD	CARPINTERIA SD WWTP	3 420101001	2	2	
	GOLETA SD	GOLETA SD WWTP	3 420102001	1	0	
	LOMPOC, CITY OF	LOMPOC REGIONAL WWTP	3 420105001	36	30	
	MORRO BAY & CAYUCOS SD	MORRO BAY/CAYUCOS WWTP	3 400103001	1	1	
	NUNES COOLING, INC.	NUNES COOLING, INC.	3 272116001	1	0	
	PISMO BEACH, CITY OF	PISMO BEACH WWTP	3 400106001	58	58	

Region	Agency	Facility	WDID	MMP Violations	Violations Receiving Penalty	Status of MMP for Facility
	RAGGED POINT INN	RAGGED POINT INN MOTEL	3 401001001	23	22	
	RMC PACIFIC MATERIALS INC	RMC LONESTAR SANTA CRUZ CEMENT	3 442004003	4	0	
	SAN LUIS OBISPO, CITY OF	SAN LUIS OBISPO WWTP	3 400107001	28	19	
	SAN SIMEON CSD	SAN SIMEON WWTP	3 400110001	1	1	
	SANTA BARBARA CITY PWD	EL ESTERO WWTP NPDES	3 420108001	2	0	
	SANTA CRUZ CITY DPW	SANTA CRUZ WWTP	3 440102001	2	0	
	SOUTH SAN LUIS OBISPO CO SD	SOUTH SAN LUIS OBISPO SD WWTP	3 400111001	2	0	
			Total	240	180	

4	AES REDONDO BEACH, LLC	REDONDO GENERATING STATION	4B192111003	22	0	
	AIR PRODUCTS AND CHEMICALS,INC	CARSON HYDROGEN PLANT	4B196400054	3	0	MMP Issued
	AIR PRODUCTS AND CHEMICALS,INC	HYDROGEN PLANT & RELATED FAC.	4B191285001	2	2	MMP Issued
	ARCO C.Q.C. KILN, INC.	ARCO C.Q.C. KILN, INC.	4B192208003	2	2	MMP Issued
	ASHLAND CHEMICAL COMPANY	ASHLAND CHEMICAL COMPANY	4B196800001	1	1	MMP Issued
	B F GOODRICH AEROSPACE	B F GOODRICH AEROSPACE CARBON	4B196400039	12	10	MMP Scheduled
	CALIFORNIA STATE UNIVERSITY	CSU, LONG BEACH, POOL, ETC	4B190800001	8	8	MMP Issued
	CALIFORNIA WATER SERVICE CO.	WELL # 29401	4B196000374	4	0	
	CALIFORNIA WATER SERVICE CO.	WELL #'S 21501 & 21502	4B196000375	2	0	
	CALLEGUAS MUNICIPAL WATER DIST	FAIRVIEW PUMP STATION	4A566000049	5	0	
	CAMARILLO SANITARY DISTRICT	CAMARILLO WWRP, NPDES	4A560100001	7	0	
	CITY OF SANTA PAULA	OMI/SANTA PAULA WWRP, NPDES	4A560108001	6	0	
	COPPERFIELD INVESTMENT & DEVEL	GW-WILSHIRE-HIGHLAND BLDG.	4B196000239	1	0	No Action Planned
	EL SEGUNDO POWER, L.L.C.	EL SEGUNDO GENERATING STATION	4B192111001	22	0	
	EQUILON ENTERPRISES, LLC	L.A. REFINING CO. (WILMINGTON)	4B192121001	2	0	
	EQUILON ENTERPRISES, LLC	MORMON ISLAND MARINE TERMINAL	4B192108009	3	3	MMP Issued
	EQUITY OFFICE PROPERTIES	THE TOWER	4B196000360	1	1	MMP Issued
	FAIRCHILD HOLDING CORP.	FAIRCHILD FASTENERS SCREWCORP	4B196800017	9	9	MMP Issued
	FILLMORE, CITY OF	FILLMORE WWTP, NPDES	4A560101002	39	27	MMP Issued
	H. R. TEXTRON INC.	VALENCIA FACILITY	4A192332001	1	1	MMP Issued
	HARRIS WATER CONDITIONING	CULLIGAN WATER	4A561037001	4	0	
	HERMETIC SEAL CORP.	HERMETIC SEAL CORP.	4B196400038	2	1	MMP Issued
	HPG MANAGEMENT	GW2-360 S. DETROIT APARTMENT	4B196100006	2	1	MMP Issued
	HPG MANAGEMENT	GW2-HANCOCK PARK PLACE APTS	4B196100005	1	1	MMP Issued
	KINDER MORGAN (FORMER GATX)	CARSON TERMINAL	4B192238002	13	12	MMP Issued

Region	Agency	Facility	WDID	MMP Violations	Violations Receiving Penalty	Status of MMP for Facility
	KINNELOA IRRIGATION DIST.	GW-K3 WATER WELL	4B196000011	10	0	
	LA CITY BUREAU OF SANITATION	MARINA INTERCEPTOR SEWER LINE	4B196000517	7	0	
	LA CITY BUREAU OF SANITATION	TERMINAL ISLAND WWTP	4B190106005	1	0	
	LA CITY BUREAU OF SANITATION	TILLMAN WWRP, NPDES	4B190106004	4	0	
	LONG BEACH GENERATION LLC	LONG BEACH GENERATION STATION	4B192111002	3	0	
	LOS ANGELES CITY OF DWP	HARBOR GENERATING STATION	4B193500004	40	0	
	LOS ANGELES CITY OF DWP	HAYNES GENERATING STATION	4B193500002	29	0	
	LOS ANGELES CITY OF DWP	LOS ANGELES HARBOR WRP	4B196100023	1	1	MMP Issued
	LOS ANGELES CITY OF DWP	TANK E AREA, HAYNES PLT, LB	4B190106049	4	4	MMP Issued
	LOS ANGELES CITY OF DWP	TANK H, J AREA, HAYNES PLT. LB	4B190106042	2	1	MMP Issued
	LOS ANGELES CITY OF DWP	TUNNEL # 105	4B190106099	1	0	
	LOS ANGELES COUNTY MUSE.OF NAT	GEORGE C PAGE MUSEUM	4B196000333	2	2	MMP Issued
	MACERICH MANAGEMENT CO.	VILLA MARINA MARKET PL	4B196000167	2	0	MMP Scheduled
	MIOTEL HOTEL	VOC-HOTEL SOFITEL LOS ANGELES	4B196800009	2	0	MMP Scheduled
	NEWHALL LAND	SOUTH RIVER DEWATERING PROJ.	4A196000467	20	0	
	NEWTONE PROPERTIES C/O HMC	NEWTON PROPERTIES C/O HMC	4B196800012	2	0	
	PAKTANK CORP. - LOS ANGELES	WILMINGTON LIQ. BULK TERMINALS	4B199019002	1	1	MMP Issued
	PASADENA, CITY OF, DWP	DEPT. OF WATER & POWER	4B190138001	1	1	MMP Issued
	PNEUMO ABEX AEROSPACE, INC.	PNEUMO ABEX AEROSPACE CORP.	4A561058001	2	2	MMP Issued
	PORT OF LONG BEACH	PIER A TOE DRAIN TREATMENT SYS	4B196800029	60	0	
	PRAXAIR, INC.	PRAXAIR, WILMINGTON	4B192140001	17	8	MMP Issued
	REDMAN EQUIPMENT & MFG CO	TORRANCE HEAT EXCHANGER MFG&RP	4B192090001	3	3	MMP Issued
	REDONDO BEACH, CITY OF	SEASIDE LAGOON	4B190143001	15	0	
	RELIANT ENERGY	MANDALAY GENERATING STATION	4A562019001	1	1	MMP Issued
	RELIANT ENERGY	ORMOND BEACH GENERATING STATIO	4A562019002	1	1	MMP Issued
	RMR PROPERTIES	RMR PROPERTIES	4B191086001	12	0	MMP Scheduled
	SAN BUENAVENTURA CITY OF	VENTURA WWRP, NPDES	4A560107001	38	36	
	SANTA MONICA,CITY OF	SANTA MONICA WATER TRT. PLANT	4B190122001	2	1	MMP Issued
	SIMI VALLEY, CITY OF	SIMI VALLEY WWRP, NPDES	4A560110001	1	0	
	SIX FLAGS MAGIC MOUNTAIN	AMUSEMENT PARK, VALENCIA	4A199002002	5	0	MMP Scheduled
	SONY PICTURES ENTERTAINMENT	GW-THE CULVER STUDIOS	4B196100019	5	0	
	SPYGLASS HOMEOWNERS ASSOCIATIO	GW-SPTGLASS HOMEOWNERS ASSOC.	4B196000188	1	1	MMP Issued
	THE BOEING COMPANY	ROCKETDYNE DIV. - SANTA SUSANA	4B562013002	30	0	
	TIDELANDS OIL PRODUCTION CO.	WILMINGTON AND TERMINAL ISLAND	4B192023001	1	0	

Region	Agency	Facility	WDID	MMP Violations	Violations Receiving Penalty	Status of MMP for Facility
	TUTOR-SALIBA TEAM	ALAMEDA MID-CORRIDOR TRENCH PJ	4B191340001	1	0	
	TUTOR-SALIBA TEAM	MID-CORRIDOR PIPELINE RELOCATI	4B196100037	6	5	
	UNIVERSITY OF CALIFORNIA LA	UNIVERSITY OF CALIFORNIA LA	4B196000532	4	0	MMP Scheduled
	UNOCAL CORP.	TANK LEAK-UNOCAL SS #5894	4B196600110	1	2	MMP Issued
	W-B LTD	GW-12100 WILSHIRE BLVD.	4B196000297	2	2	MMP Issued
			Total	514	151	

5F	ATWATER, CITY OF	WWTF	5C240100001	12	12	MMP Issued
	KAWEAH RIVER ROCK CO, INC	SAND AND GRAVEL PLANT	5D541046001	1	0	MMP Scheduled
	MALAGA CWD	WWTF	5D100124001	3	0	MMP Scheduled
	MERCED, CITY OF	WWTF	5C240108001	4	4	MMP Issued
	PLANADA CSD	WWTF	5C240110001	43	0	MMP Scheduled
	PLIANT CORPORATION	VITAFILM PLANT	5C242008001	9	0	No Action Planned
			Total	72	16	

5S	BRENTWOOD, CITY OF	BRENTWOOD WWTP	5B070101001	84	81	
	CA DEPT OF CORRECTIONS	SIERRA CONSERVATION CTR-WTP	5C550801002	32	32	
	CA DEPT OF FISH & GAME	NIMBUS HATCHERY	5A340801001	7	7	
	COLFAX, CITY OF	COLFAX STP	5A310101001	27	0	Facility Exempt - Small Community
	COLUSA, CITY OF	COLUSA WWTP	5A060101001	11	0	Facility Exempt - Small Community
	CON AGRA GROCERY PRODUCTS CO	OAKDALE FACILITY	5C502023001	12	12	
	DISCOVERY BAY CSD	DISCOVERY BAY TRMT PLANT	5B070105003	23	23	
	EAST BAY MUD	CAMANCHE DAM POWER HOUSE	5B390114001	1	1	
	GRASS VALLEY, CITY OF	GRASS VALLEY, CITY OF STP	5A290100001	76	0	No Action Planned
	GWFF POWER SYSTEMS, INC.	GWFF POWER SYSTEMS, SITE IV	5B072050003	1	0	
	HUNT-WESSON, INC.	HUNT-WESSON, INC.	5A572002001	6	6	
	LIVE OAK, CITY OF	CITY OF LIVE OAK WWTP	5A510100001	8	0	Facility Exempt - Small Community
	LODI, CITY OF	WHITE SLOUGH WATER POLL CON PU	5B390103002	2	2	
	MANTECA, CITY OF	MANTECA WW QUALITY CONTROL FAC	5B390104001	88	0	MMP Scheduled

Region	Agency	Facility	WDID	MMP Violations	Violations Receiving Penalty	Status of MMP for Facility
	PLACER CO. FACILITY SERVICES	PLACER COUNTY SMD NO. 1	5A310104007	6	6	
	PLACER CO. FACILITY SERVICES	SA NO.28, ZONE NO.6	5A310104011	17	0	Facility Exempt - Small Community
	PLACERVILLE, CITY OF	HANGTOWN CREEK WWTP	5A090100001	3	3	
	RIO VISTA, CITY OF	RIO VISTA WASTE TRT FACILITY	5A480104001	13	10	
	ROSEVILLE, CITY OF	DRY CREEK WWTP	5A310106001	3	3	
	SACRAMENTO COUNTY DPW	KIEFER LANDFILL GW TREATMENT	5A340311002	1	1	
	SEVEN CROWN RESORTS, INC.	PARADISE POINT MARINA	5B391041001	5	0	
	TEICHERT AGGREGATES	SETTLING POND DISCHARGE	5A347001001	7	6	
	TURLOCK, CITY OF	TURLOCK WWTP	5C500108001	2	0	Facility Exempt - CDO or TSO
	UC DAVIS	MAIN STP	5A570800001	5	5	
	VACAVILLE, CITY OF	EASTERLY SEWAGE TRT PLANT	5A480105002	9	6	
	WEST SACRAMENTO, CITY OF	WEST SACRAMENTO STP	5B570103001	2	1	
	WILLOWS, CITY OF	WILLOWS WWTP	5A110101001	8	0	Facility Exempt - Small Community
			Total	459	205	

	ANDERSON, CITY OF	ANDERSON WPCP	5A450100001	1	1	
	BIGGS, CITY OF	BIGGS WWTP	5A040100001	38	0	Facility Exempt - Small Community
	CALAVERAS CEMENT COMPANY	CALAVERAS CEMENT COMPANY	5A452008001	2	0	Facility Exempt - CDO or TSO
	CHICO, CITY OF	CHICO REGIONAL WWTF	5A040102001	2	2	
	COLLINS PINE COMPANY	CHESTER SAWMILL	5A322000001	2	2	
	HOLLY TREE RANCH DEVELOPMENT	GREENHORN MINE	5A459010001	3	0	No Action Planned
	REDDING, CITY OF	CLEAR CREEK WWTP	5A450103001	1	1	
			Total	49	6	

6	None					
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7	BRAWLEY, CITY OF	BRAWLEY WWTP-NPDES 00-087	7A130100011	8	4	MMP Scheduled
	CA DEPT OF CORRECTIONS	CENTINELA STATE PRISON 98-014	7A131337001	17	17	
	CALIPATRIA, CITY OF	CALIPATRIA - NPDES 00-002	7A130102041	13	0	Facility Exempt - Small Community

Region	Agency	Facility	WDID	MMP Violations	Violations Receiving Penalty	Status of MMP for Facility
	COACHELLA SANITARY DISTRICT	COACHELLA SD - NPDES 00-032	7A330104012	33	27	MMP Scheduled
	COACHELLA SANITARY DISTRICT	COACHELLA SD #2 NPDES	7A330104004	19	19	
	HEBER PUBLIC UTILITY DISTRICT	HEBER WWTP 00-100	7A130104011	52	0	Facility Exempt - CDO or TSO
	IMPERIAL COMMUN. COLLEGE DIST	IMP COMM COLLEGE WTP 99-009	7A130113011	1	1	
	IMPERIAL, CITY OF	IMPERIAL WPCP 00-040	7A130106011	6	4	Facility Exempt - Small Community
	NILAND SANITARY DISTRICT	NILAND STP 98-017	7A130109011	7	0	Facility Exempt - Small Community
	SEELEY COUNTY WATER DISTRICT	SEELEY WWTP NPDES 97-049	7A130111013	4	0	Facility Exempt - Small Community
	VALLEY SANITARY DISTRICT	VALLEY SD STP - NPDES 00-010	7A330122021	2	2	
	WESTMORLAND, CITY OF	WESTMORLAND WWTP 98-001	7A130112012	7	0	Facility Exempt - CDO or TSO
			Total	169	74	

8	ARIZONA PIPELINE CO.	DEWATERING,BALBOA ISLAND	8 303314001	1	0	
	CALIFORNIA STEEL INDUSTRIES	STORM,MULBERRY DITCH & SAN SEV	8 362023002	6	0	
	CALTRANS - DISTRICT 12	DEWATERING,GENERAL-ORANGE CO.	8 302691001	18	0	
	COLTON/SAN BERNARDINO RTT&WA	STP,RIX	8 362375001	81	78	MMP Issued
	CORONA, CITY OF	STP NO. 1	8 330108001	100	93	MMP Issued
	GARDEN GROVE, CITY OF	DEWATERING,GENERAL	8 302689001	4	4	MMP Issued
	GLEN IVY HOT SPRINGS	HOT SPRINGS,GLEN IVY	8 331050001	8	0	
	INLAND EMPIRE UTILITIES AGENCY	STP NO 1,ONTARIO-UPLAND	8 360104004	9	6	MMP Issued
	INLAND EMPIRE UTILITIES AGENCY	STP NO 2,CHINO	8 360104001	6	4	MMP Issued
	INLAND EMPIRE UTILITIES AGENCY	STP, CARBON CANYON	8 362283001	1	1	MMP Issued
	IRVINE RANCH WATER DISTRICT	STP	8 302006002	1	1	MMP Issued
	MOUNTAINVIEW POWER CO., LLC	GENERATING STATION,SAN BERDO	8 362036003	6	6	
	MWD OF SOUTHERN CALIFORNIA	WTP,DIEMER	8 300137001	1	0	
	ORANGE CO. PF&RD	DEWATERING,GENERAL	8 300124001	8	0	
	RIALTO, CITY OF	STP	8 360112001	45	42	MMP Issued
	WESTERN RIVERSIDE CO. RWA	STP,NORCO	8 332353001	74	71	MMP Issued
	YUCAIPA VALLEY WATER DISTRICT	STP	8 362222001	108	103	MMP Issued
			Total	477	409	

9	ATLANTIC RICHFIELD CO.	ARCO #03012	9 000000941	12	9	MMP Issued
	CONTINENTAL MARITIME IND, INC	CONTINENTAL MARITIME SHIPYARD	9 000000400	8	8	MMP Issued
	ESCONDIDO, CITY OF	HALE AVE WASTEWATER TRMT PLNT	9 000000031	3	3	MMP Issued

Region	Agency	Facility	WDID	MMP Violations	Violations Receiving Penalty	Status of MMP for Facility
	FALLBROOK PUBLIC UTILITY DIST	PLANT NO 1 OCEASIDE OUTFALL	9 000000115	2	2	MMP Issued
	MISSION LINEN ENGINEERING	MISSION LINEN SUPPLY	9 000000020	2	2	MMP Issued
	MORLIN MANAGEMENT CORP	GREAT AMERICAN PLAZA DEWATER	9 000000469	15	15	MMP Issued
	NATIONAL STEEL & SHIPBUILDING	NASSCO	9 000000066	21	21	MMP Issued
	NEVADA INVESTMENT HOLDINGS,INC	SUNBELT REMEDTN 1702 O'SIDE BL	9 000000817	4	4	MMP Issued
	NEW URBAN WEST, INC	BROOKSIDE CONSTRUCTION DEWAT	9 000000925	6	0	MMP Scheduled
	OCEANSIDE,CITY OF,WTR UTIL DEP	SAN LUIS REY WWTP, OCEANSIDE	9 000000146	5	5	MMP Scheduled
	PROMENADE MALL DEVELOPMT CORP	PROMENADE AT PACIFIC BCH DEWAT	9 00000005	28	0	MMP Scheduled
	RANCHO CA WD	SANTA ROSA WRF	9 000000601	28	28	MMP Issued
	SAN DIEGO, CITY OF, MWWD	POINT LOMA OCEAN OUTFALL	9 000000275	4	0	MMP Scheduled
	SAN DIEGO, CITY OF	SAN DIEGO CONVENTION CTR DEWAT	9 000000329	36	0	MMP Scheduled
	SAN ELIJO JOINT POWERS AUTH	SAN ELIJO WPCF	9 000000125	5	2	MMP Issued
	SEA WORLD, INC	SEA WORLD, SAN DIEGO	9 000000083	7	5	MMP Issued
	SOUTHERN CALIFORNIA EDISON	SONGS UNIT 1	9 000000086	3	3	MMP Issued
	SOUTHLAND CORP	7-11 STORE #20611	9 000000904	6	5	MMP Issued
	SOUTHLAND CORP	7-11 STORE #22894 REMED	9 000000910	5	3	MMP Issued
	SOUTHWEST MARINE, INC	SOUTHWEST MARINE SHIPYARD	9 000000137	1	0	MMP Issued
			Total	201	115	

GRAND TOTAL: 2976 1498
% OF NONEXEMPT VIOLATIONS W/ MMP: 58%
TOTAL # OF FACILITIES: 256
TOTAL # OF NONEXEMPT FACILITIES: 232
TOTAL # OF EXEMPT FACILITIES: 24
OF FACILITIES W/ ENFORCEMENT ACTION: 138
% OF FACILITIES W/ ENFORCEMENT ACTION: 54%
% OF NONEXEMPT FACILITIES W/ ENFORCEMENT ACTION: 60%

VIOLATIONS FOR EXEMPT FACILITIES (SMALL COMMUNITY): 310
VIOLATIONS FOR EXEMPT FACILITIES (CDO OR TSO): 63
TOTAL VIOLATIONS OR EXEMPT FACILITIES: 373