

EDMUND G. BROWN JR.
GOVERNOR

MATTHEW RODRIGUEZ
SECRETARY FOR
ENVIRONMENTAL PROTECTION

San Diego Regional Water Quality Control Board

July 7, 2017

Ms. Susanne Harrison
Harrison Trucking Inc.
8801 Olive Lane
Santee, CA 92071

CERTIFIED MAIL
7015 0640 0006 1569 8947

In reply refer to:
SM-229747:WGhoram

Subject OFFER TO SETTLE ADMINISTRATIVE CIVIL LIABILITY FOR ALLEGED VIOLATIONS OF THE GENERAL INDUSTRIAL STORM WATER PERMIT, HARRISON TRUCKING, INC, SAN DIEGO COUNTY, WDID 937I003651

Ms. Harrison:

This letter contains an offer from the California Regional Water Quality Control Board, San Diego Region (San Diego Water Board) Prosecution Team to settle potential claims for administrative civil liability arising out of alleged violations by Harrison Trucking Inc. of the General Permit for Storm Water Discharges Associated with Industrial Activities, (Order No. 2014-0057-DWQ¹) at 8801 Olive Lane, Santee, California.

As the legally responsible person enrolled in Order No. 2014-0057-DWQ, Ms. Susanne Harrison, on behalf of Harrison Trucking Inc., is responsible for complying with all elements of the General Permit and for penalties associated with non-compliance. Hereafter, this letter will be the "Settlement Offer." For the purposes of this Settlement Offer, Harrison Trucking Inc. is liable for ensuring compliance with Order No. 2014-0057-DWQ. The San Diego Water Board acknowledges that Forester Square L.P. owns the property at 8801 Olive Lane in Santee, and leases that property to Harrison Trucking Inc. Should Harrison Trucking Inc. fail to fully comply with the requirements of Order No. 2014-0057-DWQ, the San Diego Water Board may issue an enforcement order (e.g. Cleanup and Abatement Order pursuant to Water Code section 13304) naming Forester Square L.P. and Harrison Trucking Inc. as the responsible parties.

This Settlement Offer provides Harrison Trucking Inc. with an opportunity to resolve the alleged violations through payment of nineteen thousand and fifty-nine dollars (\$19,059). Please read this letter carefully and respond no later than September 5, 2017.

Description of Alleged Violations

The San Diego Water Board Prosecution Team (Prosecution Team) alleges the following violations of Order No. 2014-0057-DWQ. A description of these alleged violations are available for review, and found in the enclosed April 11, 2017 San Diego Water Board Facility Inspection Report (Exhibit 1), issued to Harrison Trucking Inc. on May 12, 2017.

¹ A copy of Order No. 2014-0057-DWQ is available on-line at:
http://www.waterboards.ca.gov/water_issues/programs/stormwater/industrial.shtml

1. Failure to Implement Best Management Practices (BMPs): Harrison Trucking Inc. violated section X.H.1 of Order No. 2014-0057-DWQ by failing to implement BMPs to reduce or prevent pollutants associated with industrial activities in storm water discharges on April 11, 2017.
2. Failure to Submit Annual Report: Harrison Trucking Inc. violated section XVI and section O of Order No. 2014-0057-DWQ by failing to submit and upload to the Storm Water Multiple Application and Report Tracking System (SMARTS) the fiscal year (FY) 2015-2016 annual report by the required due date of July 1, 2016.
3. Failure to Develop and Update the Storm Water Pollution Prevention Plan (SWPPP): Harrison Trucking Inc. violated section X of Order No. 2014-0057-DWQ by failing to develop and update an adequate SWPPP and required site map.
4. Failure to Pay Annual Fees: Harrison Trucking Inc. violated section II. C.1 of Order No. 2014-0057-DWQ by failing to pay the annual fee for coverage under Order No. 2014-0057-DWQ for FY 2015-2016.

Statutory Liability

Pursuant to section 13385 of the California Water Code, Harrison Trucking Inc. is liable for administrative civil liabilities of up to \$10,000 per violation for each day in which the violation occurs and \$10 per gallon discharged in excess of the first 1,000 gallons. The statutory minimum civil liability is the economic benefit resulting from the violations. The State Water Resources Control Board's Water Quality Enforcement Policy (Enforcement Policy²) states that the minimum penalty is to be the economic benefit plus 10%. For the violations described in the attachments, the maximum potential liability is \$40,000 and the minimum liability is \$6,063. However, the statutory maximum and minimum liabilities would be considerably higher if prior inspection days and additional delinquent submittals were to be included in the penalty calculation.

Proposed Settlement Offer

The Prosecution Team proposes to resolve the violation(s) with this Settlement Offer of \$19,059. This Settlement Offer was determined based on an assessment of the factors set forth in California Water Code section 13385(e) using the penalty methodology set forth in the Enforcement Policy. The enclosed "Penalty Calculation Methodology" describes in detail how the penalty amount was calculated (Exhibit 2). The Prosecution Team believes that the proposed resolution of the alleged violation(s) is fair and reasonable, fulfills the San Diego Water Board's enforcement objectives, and is in the best interest of the public.

Should Harrison Trucking Inc. choose *not* to accept this Settlement Offer, please be advised that the Prosecution Team reserves the right to seek a higher liability amount, up to the maximum allowed by statute, either through issuance of a formal administrative civil liability complaint or by referring the matter to the Attorney General's Office. The Prosecution Team also reserves the right to conduct additional investigation, including issuance of investigation orders and/or subpoenas to determine the number of gallons discharged and whether additional violations occurred. Any additional violations and gallons of discharge subjecting Harrison Trucking Inc. to liability may be included in a formal enforcement action. Harrison Trucking Inc. can avoid the risks inherent in a formal enforcement action and settle the alleged violation(s) by accepting this Settlement Offer. Please

² The Water Quality Enforcement Policy is available on-line at:
https://www.waterboards.ca.gov/water_issues/programs/enforcement/policy.shtml

note that the Settlement Offer does not address liability for any violation that is not specifically identified in the attached inspection report. The Prosecution Team reserves the right to take further enforcement actions against Harrison Trucking Inc. for all past and future violations against Order No. 2014-0057-DWQ or subsequently adopted orders.

Options for Responding to the Settlement Offer

Option A: Accept the Offer

If Harrison Trucking Inc. chooses to accept this Settlement Offer, then the enclosed *Acceptance of Settlement Offer and Waiver of Right to Hearing (Acceptance and Waiver)* shall be completed and submitted, via email, no later than **September 5, 2017** to the following address:

California Regional Water Quality Control Board, San Diego Region
Attention: Chiara Clemente, Supervisor, Compliance Assurance Unit
Email: SanDiego@waterboards.ca.gov

Important! Upon receipt of the *Acceptance and Waiver*, this settlement will be publically noticed for a 30-day comment period as required by federal regulations. If no substantive comments are received within the 30 days, the Prosecution Team will ask the San Diego Water Board's Executive Officer to formally endorse the *Acceptance and Waiver* as an order of the San Diego Water Board. An invoice will then be mailed to Harrison Trucking Inc. requiring payment of the **\$19,059** administrative civil liability within 30 days of the date of the invoice.

If, however, substantive comments are received in opposition to this settlement or the Executive Officer declines to accept the settlement, then the Settlement Offer may be withdrawn. In this case, Harrison Trucking Inc. will be notified and Harrison Trucking Inc.'s waiver pursuant to the *Acceptance and Waiver* will also be treated as withdrawn. The unresolved violation(s) will be addressed in a formal enforcement action. An administrative civil liability complaint may be issued and the matter may be set for a hearing.

Option B: Contest the Alleged Violations

If Harrison Trucking Inc. wishes to contest the violation(s) or the methodology used to calculate the proposed liability, they must submit a written response identifying the basis for the challenge, including any evidence to support their claims. Harrison Trucking Inc.'s response must be received by the San Diego Water Board no later than **September 5, 2017**. The Prosecution Team will evaluate Harrison Trucking Inc.'s basis for a challenge and may seek clarifying information or schedule an in-person meeting. The Prosecution Team will inform Harrison Trucking Inc. whether a reduction in the settlement amount is warranted, or whether the original settlement amount is appropriate. Harrison Trucking Inc. will be provided a final opportunity to accept the revised/original settlement amount before proceeding to formal enforcement.

Option C: Reject Offer

If Harrison Trucking Inc. chooses to reject this Settlement Offer or does not complete and return the *Acceptance and Waiver*, Harrison Trucking Inc. should expect that the Prosecution Team would conduct further investigation of the violation(s), issue a cleanup and abatement order and/or assessment of civil liabilities complaint, and schedule a hearing. Harrison Trucking Inc. will receive notice of any deadlines associated with that action. As previously stated, in such an action, the liability amount sought or imposed may exceed the liability amount set forth in this Settlement Offer.

If you have any questions about this settlement offer, please contact Ms. Chiara Clemente at (619) 521-3371 or at chiara.clemente@waterboards.ca.gov.

Respectfully,



JAMES G. SMITH
Assistant Executive Officer

cc (via email): Susanne Harrison, Harrison Trucking Inc., susanneharrison3@gmail.com
 Kenneth L Sauder, Forester Square L.P., ksauder@wakelandhdc.com
 Catherine Hawe, SWRCB Office of Enforcement, CHawe@waterboards.ca.gov
 David Boyers, SWRCB Office of Enforcement, DBoyers@waterboards.ca.gov
 Cecilia Tipton, City of Santee, CTipton@CityofSanteeCa.gov

Enclosures:

Acceptance of Settlement Offer and Waiver of Right to a Hearing
Exhibit 1 – San Diego Water Board Inspection Report – April 2017
Exhibit 2 – Settlement Offer Calculations

ORDER NO. R9-2017-0095

**ACCEPTANCE OF SETTLEMENT OFFER AND WAIVER OF RIGHT TO A HEARING
FOR**

HARRISON TRUCKING INCORPORATED

SAN DIEGO COUNTY

By signing below and returning this *Acceptance of Settlement Offer and Waiver of Right to Hearing (Acceptance and Waiver)* to the California Regional Water Quality Control Board, San Diego Region (San Diego Water Board), Harrison Trucking, Inc. hereby accepts the Settlement Offer described in the letter dated July 7, 2017 and titled *Offer to Settle Administrative Civil Liability, Harrison Trucking Inc., San Diego County, WDID: 9 371003651*. Harrison Trucking Inc. also hereby waives the right to a hearing before the San Diego Water Board to dispute the alleged violations described in the Settlement Offer and its enclosures.

Harrison Trucking Inc. agrees that the Settlement Offer shall serve as a complaint pursuant to Article 2.5 of the California Water Code (Water Code) and that no separate complaint is required for the San Diego Water Board to assert jurisdiction over the alleged violations. Harrison Trucking Inc. agrees to perform the following:

- Pay an administrative civil liability in the sum of nineteen thousand fifty nine dollars (\$19,059) by cashier's check or certified check made payable to the "State Water Resources Control Board Cleanup and Abatement Account." This payment shall be deemed payment in full of any civil liability pursuant to Water Code section 13385 that might otherwise be assessed for violations described in the Settlement Offer and its enclosures.
- Fully comply with the conditions of the *National Pollutant Discharge Elimination System (NPPDES) General Permit No. CAS000001 for Storm Water Discharges Associated with Industrial Activities, Order No. 2014-0057-DWQ* (Industrial General Order) at the Harrison Trucking industrial site in Santee, California.

Harrison Trucking Inc. understands that by signing this *Acceptance and Waiver*, Harrison Trucking Inc. has waived its rights to contest the allegations in the Settlement Offer and the civil liability amount for the alleged violation(s). Harrison Trucking Inc. understands that this *Acceptance and Waiver* does not address or resolve any liability for any violation not specifically identified in the Settlement Offer and its enclosures.

Upon execution by Harrison Trucking Inc., the *Acceptance and Waiver* shall be returned to the following address:

California Regional Water Quality Control Board, San Diego Region
Attention: Chiara Clemente, Supervisor, Compliance Assurance Unit
Email: SanDiego@waterboards.ca.gov

Harrison Trucking Inc. understands that federal regulations require the San Diego Water Board Prosecution Team (Prosecution Team) to publish notice of and provide at least 30 days for public comment on any proposed resolution of an enforcement action for violations of an NPDES permit. Accordingly, this *Acceptance and Waiver*, prior to being formally endorsed by

the San Diego Water Board Executive Officer (acting as head of the Advisory Team), will be published as required by law for public comment.

If no comments are received within the notice period that cause the Prosecution Team to reconsider the Settlement Offer, then the Prosecution Team will present this *Acceptance and Waiver* to the San Diego Water Board's Executive Officer for formal endorsement on behalf of the San Diego Water Board.

Harrison Trucking Inc. understands that if significant comments are received in opposition to the settlement, then the offer may be withdrawn by the Prosecution Team. If the Settlement Offer is withdrawn, then Harrison Trucking Inc. will be notified and Harrison Trucking Inc.'s waiver pursuant to the *Acceptance and Waiver* will also be treated as withdrawn. The unresolved violation(s) will be addressed in a formal enforcement action. An administrative civil liability complaint may be issued and the matter may be set for a hearing.

Harrison Trucking Inc. understands that once this *Acceptance and Waiver* is formally endorsed and an Order Number is inserted, then the full payment is a condition of this *Acceptance and Waiver*. An invoice will be sent upon endorsement, and full payment will be due within 30 days of the date of the invoice.

I hereby affirm that I am duly authorized to act on behalf of and to bind Harrison Trucking Inc. in the making and giving of this *Acceptance and Waiver*.

HARRISON TRUCKING, INC. _____

By: _____

Title _____

Date: _____

IT IS SO ORDERED, pursuant to Water Code section 13385.

By: _____
David W. Gibson, Executive Officer, San Diego Water Board

Date: _____

Exhibit 2 - Settlement Offer Calculations

Compressed Administrative Civil Liability
Settlement Offer Calculator Summary
Order No. R9-2017-0095

Allegation of Violation	Civil Liability				
	Maximum	Minimum	Initial	Base	Final
Allegation No. 1: Failure to Implement Best Management Practices (BMPs)	\$10,000	\$2,894	\$5,500	\$8,652	\$8,652
Allegation No. 2: Failure to Submit Annual Report	\$10,000	\$724	\$3,500	\$6,006	\$724
Allegation No. 3: Failure to Develop and Update the Storm Water Pollution Prevention Plan (SWPPP)	\$10,000	\$2,200	\$5,500	\$9,438	\$9,438
Allegation No. 4: Failure to Pay Annual Fees	\$10,000	\$245	\$3,500	\$6,006	\$245

Total Maximum Civil Liability \$40,000

Total Minimum Civil Liability \$6,063

Total Final Civil Liability \$19,059

Exhibit 2 - Settlement Offer Calculations

Allegation No. 1: Failure to Implement Best Management Practices (BMPs)

Harrison Trucking Inc. violated section H.1 of Order No. 2014-0057-DWQ by failing to implement BMPs to reduce or prevent pollutants associated with industrial activities in storm water discharges on April 11, 2017. For the purpose of an expedited settlement, the Prosecution Team is willing to consider all BMP violations as one violation.

PENALTY FACTOR	VALUE	DISCUSSION
Discharge Violations	n/a	This step is not applicable because the violation is not a discharge violation. The Prosecution Team assigned a Potential for Harm score of "moderate" to this violation because: 1) San Diego Water Board inspectors observed oil and grease discharges to the ground and exposed to storm water at numerous locations from leaking vehicles and spills. The discharge of oil and grease from leakage and waste to surface waters can cause physical fouling of aquatic habitats, can deplete oxygen supplies to aquatic organisms, and in sufficient quantities can render water supplies unfit for human consumption; 2) San Diego Water Board inspectors observed stockpiled soil with no containment exposed to storm water. Suspended sediment in surface waters can cause a significant risk or threat to aquatic organisms by abrasion of surface membranes, interference with respiration, and sensory perception in aquatic fauna. Suspended sediment can reduce photosynthesis in and survival of aquatic flora by limiting the transmittance of light. The discharge of sand to receiving waters can be lethal when it smothers benthic communities. Excess settleable solids can smother benthic communities and alter the hydrology of a water body, which in turn can cause habitat type conversion. Implementation of BMPs, in accordance with Order No. 2014-0057-DWQ, will reduce or eliminate the discharge of wastes from the site.
Potential for Harm	Moderate	Harrison Trucking is located in the San Diego River Hydrologic Unit and is in close proximity to Forester Creek, a tributary to the San Diego River. The San Diego River is a Clean Water Act section 303(d) listed waterbody impaired for enterococcus, fecal coliform, low dissolved oxygen, manganese, nitrogen, phosphorus, total dissolved solids, and toxicity. Forester Creek is also a Clean Water Act section 303(d) listed waterbody impaired for fecal coliform, selenium, total dissolved solids, pH, and toxicity.
Deviation from Requirement	Major	The Prosecution Team assigned a Deviation from Requirement score of "major" to this violation because Harrison Trucking Inc. failed to implement several BMPs to reduce or prevent pollutants associated with industrial activities in storm water discharges, rendering the requirements ineffective in their essential functions.
Per Day Factor	0.55	Determined from Table 3 in the Enforcement Policy. The middle value was chosen.
Days of Violation	1	San Diego Water Board staff observed BMPs not implemented on April 11, 2017.
Initial Liability for Allegation No. 1	\$5,500	The initial liability is calculated as per day factor multiplied by the number of days multiplied by the maximum liability per day.
Culpability	1.3	Harrison Trucking Inc. applied for and received permit coverage under Order No. 2014-0057-DWQ and has been operating for at least four years. Therefore, Harrison Trucking Inc. was aware of the requirements of Order No. 2014-0057-DWQ.
Cleanup and Cooperation	1.1	Harrison Trucking Inc. made little to no effort to demonstrate that corrective actions had been taken to resolve the cited deficiencies.
History of Violations	1.1	Records provided by the City of Santee indicate that five-compliance inspections were performed. The City issued two Notices to Comply and one Notice of Violation. The City of Santee observed a lack of BMPs, inadequate BMPs, poor housekeeping, and inadequate SWPPP. The San Diego Water Board has performed seven-compliance inspections and issued 13 formal and informal enforcement actions, which includes five Notices of Non-compliance, three Notices of Violation, two Staff Enforcement Letters, two Verbal Enforcement Notifications, and one Notice to Comply. Violations against Order No. 2014-0057-DWQ include a lack of BMPs, inadequate BMPs, poor housekeeping, non-storm water discharges, inadequate reporting, failure to report, and failure to pay annual fees.
Total Base Liability for Allegation No. 1	\$8,652	The total base liability is calculated as the initial liability multiplied by the culpability, cleanup and cooperation, and history of violation factors.
Ability to Pay	Yes	Based on publicly available information, the Prosecution Team concludes that Harrison Trucking, Inc. should have the ability to pay the Total Base Liability Amount.
Other Factors as Justice May Require	None	The cost of investigation and enforcement are "other factors as justice may require," and could be added to the liability amount. The San Diego Water Board has incurred over \$5,000 in staff costs associated with the investigation and enforcement of the alleged violations. While this amount could be added to the penalty, it is not added at this time, as a settlement consideration.
Maximum Liability	\$10,000	Based on California Water Code section 13385: \$10,000 per day per violation and \$10 per gallon.
Minimum Liability	\$2,894	Based on California Water Code section 13385: civil liability must be at least the economic benefit of non-compliance. Per the Enforcement Policy, the minimum liability is to be the economic benefit plus 10%.
Final Liability for Allegation No. 1	\$8,652	The final liability amount is the total base liability plus any adjustment for the ability to pay, economic benefit, and other factors. The final liability must be more than the minimum liability and less than the maximum liability.

Allegation No. 2: Failure to Submit Annual Report

Harrison Trucking Inc. violated sections XVI and O of Order No. 2014-0057-DWQ by failing to submit and upload to the Storm Water Multiple Application and Report Tracking System (SMARTS) the fiscal year (FY) 2015-2016 annual report by the required due date of July 1, 2016.

PENALTY FACTOR	VALUE	DISCUSSION
Discharge Violations	n/a	This step is not applicable because the violation is not a discharge violation.
Potential for Harm	Minor	The Prosecution Team has assigned a Potential for Harm score of "minor" for this violation because it presents no direct threat to beneficial uses although it does harm to the regulatory program by contributing to an incomplete assessment of water quality data provided in monitoring reports.
Deviation from Requirement	Major	The Prosecution Team assigned a Deviation from Requirement score of "major" because Harrison Trucking Inc. failed to submit the annual report for fiscal year 2015-2016, thereby rendering the requirement wholly ineffective.
Per Day Factor	0.35	Determined from Table 3 in the Enforcement Policy. The middle value was chosen.
Days of Violation	1	San Diego Water Board staff reviewed the SMARTS database and identified the annual report for FY 2015-2016 had not been submitted and uploaded into SMARTS as of April 11, 2017.
Initial Liability for Allegation No. 2	\$3,500	The initial liability is calculated as per day factor multiplied by the number of days multiplied by the maximum liability per day.
Culpability	1.3	Harrison Trucking Inc. applied for and received permit coverage under Order No. 2014-0057-DWQ and has been operating for at least four years. Therefore, Harrison Trucking Inc. was aware of the requirements of Order No. 2014-0057-DWQ.
Cleanup and Cooperation	1.2	Harrison Trucking Inc., to date, has failed to submit the required annual report for FY 2015-2016.
History of Violations	1.1	Records provided by the City of Santee indicate that five-compliance inspections were performed. The City issued two Notices to Comply and one Notice of Violation. The City of Santee observed a lack of BMPs, inadequate BMPs, poor housekeeping, and inadequate SWPPP. The San Diego Water Board has performed seven-compliance inspections and issued 13 formal and informal enforcement actions, which includes five Notices of Non-compliance, three Notices of Violation, two Staff Enforcement Letters, two Verbal Enforcement Notifications, and one Notice to Comply. Violations against Order No. 2014-0057-DWQ include a lack of BMPs, inadequate BMPs, poor housekeeping, non-storm water discharges, inadequate reporting, failure to report, and failure to pay annual fees.
Total Base Liability for Allegation No. 2	\$6,006	The total base liability is calculated as the initial liability multiplied by the culpability, cleanup and cooperation, and history of violation factors.
Ability to Pay	Yes	Based on publicly available information, the Prosecution Team concludes that Harrison Trucking, Inc. should have the ability to pay the Total Base Liability Amount.
Other Factors as Justice May Require	Yes	California Water Code section 13399.31 requires that if after receiving two Notices of Noncompliance, a discharger still has not submitted the annual report, it is subject to a mandatory penalty of not less than \$1,000, plus staff costs. Due to workload constraints, the San Diego Water Board did not issue Harrison Trucking Inc. the required notices to trigger the mandatory penalty; therefore, this violation is assessed pursuant to California Water Code section 13385. The Prosecution Team has determined that the calculated penalty amount is excessive for the violation. And, in order to make the penalty assessment similar to the mandatory penalty amount, the civil liability recommended for this violation is adjusted to the minimum liability amount of \$724.
Maximum Liability	\$10,000	Based on California Water Code section 13385: \$10,000 per day per violation and \$10 per gallon.
Minimum Liability	\$724	Based on California Water Code section 13385: civil liability must be at least the economic benefit of non-compliance. Per the Enforcement Policy, the minimum liability is to be the economic benefit plus 10%.
Final Liability for Allegation No. 2	\$724	The final liability amount is equal to the minimum penalty amount. The final liability must be no less than the minimum liability and no more than the maximum liability.

Exhibit 2 - Settlement Offer Calculations

Allegation No. 3: Failure to Develop and Update the Storm Water Pollution Prevention Plan (SWPPP)

Harrison Trucking Inc. violated section X of Order No. 2014-0057-DWQ by failing to develop and update an adequate SWPPP and required site map, and failing to provide the SWPPP during the facility inspection report.

PENALTY FACTOR	VALUE	DISCUSSION
Discharge Violations	n/a	This step is not applicable because the violation is not a discharge violation.
Potential for Harm	Moderate	The Prosecution Team assigned a Potential for Harm score of "moderate" to this violation because the Harrison Trucking Inc. failed to develop and update the SWPPP required by sections I and N of Order No. 2014-0057-DWQ. SWPPPs require Harrison Trucking Inc. to describe the action to be performed to achieve compliance with Order No. 2014-0057-DWQ. Failure to develop and update the SWPPP creates an absence of guidance for Harrison Trucking Inc. to implement and maintain BMPs, which may result in additional violations of Order No. 2014-0057-DWQ, impairment of beneficial uses and water quality, and threaten and harm aquatic plants and animals.
Deviation from Requirement	Major	The Prosecution Team assigned a Deviation from Requirement score of "major" because Harrison Trucking Inc. failed to update the SWPPP, thereby rendering the requirement ineffective.
Per Day Factor	0.55	Determined from Table 3 in the Enforcement Policy. The middle value was chosen.
Days of Violation	1	San Diego Water Board staff review of the SMARTS database identified the SWPPP had not been updated as of April 11, 2017. During the April 11, 2017 inspection, Harrison Trucking Inc. failed to allow San Diego Water Board inspectors to view the SWPPP records maintained on site.
Initial Liability for Allegation No. 3	\$5,500	The initial liability is calculated as per day factor multiplied by the number of days multiplied by the maximum liability per day.
Culpability	1.3	Harrison Trucking Inc. applied for and received permit coverage under Order No. 2014-0057-DWQ. Therefore, Harrison Trucking Inc. was aware of the requirements of Order No. 2014-0057-DWQ. During the April 11, 2017 inspection, Harrison Trucking Inc. was reminded that a updated SWPPP is required.
Cleanup and Cooperation	1.2	The Enforcement Policy defines the Cleanup and Cooperation factor as the extent to which Harrison Trucking Inc. voluntarily cooperated in returning to compliance and correcting environmental damage, including any voluntary cleanup efforts taken, with an adjustment multiplier between 0.75 and 1.5. The Prosecution Team assigns a Cleanup and Cooperation multiplier of 1.2 to this violation because Harrison Trucking Inc. elected to withhold the records maintained onsite during the April 11, 2017 inspection, thereby demonstrating an unwillingness to cooperate or return to compliance.
History of Violations	1.1	Records provided by the City of Santee indicate that five-compliance inspections were performed. The City issued two Notices to Comply and one Notice of Violation. The City of Santee observed a lack of BMPs, inadequate BMPs, poor housekeeping, and inadequate SWPPP. The San Diego Water Board has performed seven-compliance inspections and issued 13 formal and informal enforcement actions, which includes five Notices of Non-compliance, three Notices of Violation, two Staff Enforcement Letters, two Verbal Enforcement Notifications, and one Notice to Comply. Violations against Order No. 2014-0057-DWQ include a lack of BMPs, inadequate BMPs, poor housekeeping, non-storm water discharges, inadequate reporting, failure to report, and failure to pay annual fees.
Total Base Liability for Allegation No. 3	\$9,438	The total base liability is calculated as the initial liability multiplied by the culpability, cleanup and cooperation, and history of violation factors.
Ability to Pay	Yes	Based on publicly available information, the Prosecution Team concludes that Harrison Trucking, Inc. should have the ability to pay the Total Base Liability Amount.
Other Factors as Justice May Require	None	The cost of investigation and enforcement are "other factors as justice may require," and could be added to the liability amount. The San Diego Water Board has incurred over \$5,000 in staff costs associated with the investigation and enforcement of the alleged violations. While this amount could be added to the penalty, it is not added at this time.
Maximum Liability	\$10,000	Based on California Water Code section 13385: \$10,000 per day per violation and \$10 per gallon.
Minimum Liability	\$2,200	Based on California Water Code section 13385: civil liability must be at least the economic benefit of non-compliance. Per the Enforcement Policy, the minimum liability is to be the economic benefit plus 10%.
Final Liability for Allegation No. 3	\$9,438	The final liability amount is the total base liability plus any adjustment for the ability to pay, economic benefit, and other factors. The final liability must be more than the minimum liability and less than the maximum liability.

Exhibit 2 - Settlement Offer Calculations

Allegation No. 4: Failure to Pay Annual Fees

Harrison Trucking Inc. violated section C of Order No. 2014-0057-DWQ by failing to pay the annual fee for coverage under Order No. 2014-0057-DWQ for FY 2015-2016. For the purpose of an expedited settlement, the Prosecution Team is not considering additional violations for other past due annual fees. However, all unpaid annual fees remain past due and payable, and this settlement offer does not include those fees.

PENALTY FACTOR	VALUE	DISCUSSION
Discharge Violations	n/a	This step is not applicable because the violation is not a discharge violation.
Potential for Harm	Minor	The Prosecution Team has assigned a Potential for Harm score of "minor" for this violation because it presents no direct threat to beneficial uses although it does harm to the regulatory program.
Deviation from Requirement	Major	The Prosecution Team assigned a Deviation from Requirement score of "major" because Harrison Trucking Inc. failed to pay the annual fee for fiscal year 2015-2016, thereby rendering the requirement wholly ineffective.
Per Day Factor	0.35	Determined from Table 3 in the Enforcement Policy. The middle value was chosen.
Days of Violation	1	San Diego Water Board staff review of the SMARTS database identified a non-payment of the annual fee for FY2015-2016, as of April 11, 2017.
Initial Liability for Allegation No. 4	\$3,500	The initial liability is calculated as per day factor multiplied by the number of days multiplied by the maximum liability per day.
Culpability	1.3	Harrison Trucking Inc. applied for and received permit coverage under Order No. 2014-0057-DWQ and has been operating for at least four years. Therefore, Harrison Trucking Inc. was aware of the requirements of Order No. 2014-0057-DWQ.
Cleanup and Cooperation	1.2	Discharger made no efforts to pay the FY 2015-2016 annual fee, despite receiving payment notifications.
History of Violations	1.1	Records provided by the City of Santee indicate that five-compliance inspections were performed. The City issued two Notices to Comply and one Notice of Violation. The City of Santee observed a lack of BMPs, inadequate BMPs, poor housekeeping, and inadequate SWPPP. The San Diego Water Board has performed seven-compliance inspections and issued 13 formal and informal enforcement actions, which includes five Notices of Non-compliance, three Notices of Violation, two Staff Enforcement Letters, two Verbal Enforcement Notifications, and one Notice to Comply. Violations against Order No. 2014-0057-DWQ include a lack of BMPs, inadequate BMPs, poor housekeeping, non-storm water discharges, inadequate reporting, failure to report, and failure to pay annual fees.
Total Base Liability for Allegation No. 4	\$6,006	The total base liability is calculated as the initial liability multiplied by the culpability, cleanup and cooperation, and history of violation factors.
Ability to Pay	Yes	Based on publicly available information, the Prosecution Team concludes that Harrison Trucking, Inc. should have the ability to pay the Total Base Liability Amount.
Other Factors as Justice May Require	Yes	The Enforcement Policy's penalty calculation methodology calculated a penalty for failing to pay the FY 2015-2016 annual fee. The Prosecution Team has determined that the calculated penalty amount is excessive for the violation. Therefore, the recommended civil liability for this violation has been adjusted to the minimum liability amount of \$245. The recommended civil liability does not capture the original fee or delinquent fees. In other words, this violation is ongoing and the original fee and all delinquent fee payments remain due and payable until they are paid in full by Harrison Trucking Inc.
Maximum Liability	\$10,000	Based on California Water Code section 13385: \$10,000 per day per violation and \$10 per gallon.
Minimum Liability	\$245	Based on California Water Code section 13385: civil liability must be at least the economic benefit of non-compliance. Per the Enforcement Policy, the minimum liability is to be the economic benefit plus 10%.
Final Liability for Allegation No. 4	\$245	The final liability amount is the total base liability plus any adjustment for the ability to pay, economic benefit, and other factors. The final liability must be more than the minimum liability and less than the maximum liability.

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD - SAN DIEGO REGION
STORM WATER MANAGEMENT UNIT**

FACILITY INSPECTION REPORT

FACILITY: Harrison Trucking Incorporated (HTI)
INSPECTION DATE/TIME: 04/11/2017, 10:30 AM
WDID/ECM PIN: 9 371003651, SM-229747

REPRESENTATIVE(S) PRESENT DURING INSPECTION:

NAME: <u>Whitney Ghoram</u>	AFFILIATION: <u>San Diego Water Board</u>
NAME: <u>Roger Mitchell</u>	AFFILIATION: <u>San Diego Water Board</u>
NAME: <u>Susanne Harrison</u>	AFFILIATION: <u>HTI & Irwindale Equipment Corporation</u>

Susanne Harrison, Harrison Trucking Incorporated
NAME OF OWNER, AGENCY OR PARTY RESPONSIBLE FOR DISCHARGE

Harrison Trucking Incorporated
FACILITY OR DEVELOPER NAME (if different from owner)

8801 Olive Lane, Santee, CA 92071
OWNER MAILING ADDRESS

8801 Olive Lane, Santee, CA 92071
FACILITY ADDRESS

Susanne Harrison
OWNER CONTACT NAME AND PHONE #

Susanne Harrison, 619-449-0840
FACILITY OR DEVELOPER CONTACT NAME AND PHONE #

APPLICABLE WATER QUALITY LICENSING REQUIREMENTS:

- | | |
|---|---|
| <input type="checkbox"/> MS4 URBAN RUNOFF REQUIREMENTS | <input type="checkbox"/> GENERAL OR INDIVIDUAL WASTE DISCHARGE REQUIREMENTS OR NPDES |
| <input type="checkbox"/> CONSTRUCTION GENERAL PERMIT | <input type="checkbox"/> GENERAL OR INDIVIDUAL WAIVER OF WASTE DISCHARGE REQUIREMENTS |
| <input type="checkbox"/> CALTRANS GENERAL PERMIT | <input type="checkbox"/> SECTION 401 WATER QUALITY CERTIFICATION |
| <input checked="" type="checkbox"/> INDUSTRIAL GENERAL PERMIT | <input type="checkbox"/> CWC SECTION 13264 |

INSPECTION TYPE (Check One):

- "A" TYPE COMPLIANCE--COMPREHENSIVE INSPECTION IN WHICH SAMPLES ARE TAKEN. (EPA TYPE S)
- "B" TYPE COMPLIANCE--A ROUTINE NONSAMPLING INSPECTION. (EPA TYPE C)
- NONCOMPLIANCE FOLLOW-UP--INSPECTION MADE TO VERIFY CORRECTION OF A PREVIOUSLY IDENTIFIED VIOLATION.
- ENFORCEMENT FOLLOW-UP--INSPECTION MADE TO VERIFY THAT CONDITIONS OF AN ENFORCEMENT ACTION ARE BEING MET.
- COMPLAINT--INSPECTION MADE IN RESPONSE TO A COMPLAINT.
- PRE-REQUIREMENT--INSPECTION MADE TO GATHER INFO. RELATIVE TO PREPARING, MODIFYING, OR RESCINDING REQUIREMENTS.
- NO EXPOSURE CERTIFICATION (NEC) - VERIFICATION THAT THERE IS NO EXPOSURE OF INDUSTRIAL ACTIVITIES TO STORM WATER.
- NOTICE OF TERMINATION REQUEST FOR INDUSTRIAL FACILITIES OR CONSTRUCTION SITES - VERIFICATION THAT THE FACILITY OR CONSTRUCTION SITE IS NOT SUBJECT TO PERMIT REQUIREMENTS.
- COMPLIANCE ASSISTANCE INSPECTION-OUTREACH INSPECTION DUE TO DISCHARGER'S REQUEST FOR COMPLIANCE ASSISTANCE.

INSPECTION FINDINGS:

YES WERE VIOLATIONS NOTED DURING THIS INSPECTION? (YES/NO/PENDING SAMPLE RESULTS)

Facility: Harrison Trucking Incorporated
Inspection Date: 04/11/2017

COMPLIANCE HISTORY / PURPOSE OF INSPECTION

The San Diego Water Board conducted compliance inspections of Harrison Trucking Incorporated (HTI) on January 5, 2001, December 20, 2011, September 18, 2012, October 15, 2013, July 2, 2015, and October 13, 2015. San Diego Water Board found HTI (Discharger) to be in violation of the Statewide Industrial General Storm Water Permit Order No. 2014-0057-DWQ (Industrial General Permit) during all of the inspections. On April 11, 2017, San Diego Water Board inspectors, Ms. Whitney Ghoram and Mr. Roger Mitchell performed a non-compliance follow-up inspection of HTI as a result of inspection observations reported to the San Diego Water Board by Ms. Cecilia Tipton, Storm Water Program Manager, City of Santee, Department of Development Services on April 10, 2017.

The HTI site is located at 8801 Olive Lane, Santee, in the County of San Diego. Further, the HTI site is located in the San Diego River Hydrologic Unit (907.00 HU), and discharges to Forester Creek (HSA 907.12), a tributary to the San Diego River. The Regional Water Quality Control Plan for the San Diego Region (Basin Plan) designates the following beneficial uses for Forrester Creek: industrial service supply, contact water recreation, non-contact water recreation, warm freshwater habitat, wildlife habitat. Forester Creek is also a Clean Water Act Section 303(d) listed waterbody, impaired for fecal coliform, selenium, total dissolved solids, and pH.

The Basin Plan designates the following beneficial uses for the San Diego River: industrial service supply, contact water recreation, non-contact water recreation, warm freshwater habitat, wildlife habitat. The San Diego River is also a Clean Water Act Section 303(d) listed waterbody, impaired for enterococcus, fecal coliform, low dissolved oxygen, manganese, nitrogen, phosphorus, total dissolved solids, and toxicity.

The weather on the day of the inspection was sunny. The inspectors met with Ms. Susanne Harrison, owner of HTI and requested permission to inspect the HTI site and take photos. Ms. Harrison granted permission to inspect the HTI site and take photos. Ms. Harrison accompanied the inspectors during the inspection.

FINDINGS

1. The facility is in the same condition that it was during the October 15, 2013 and October 13, 2015, San Diego Water Board compliance inspections. Poor housekeeping best management practices (BMPs) and lack of secondary containment BMPs were observed (see photos in Attachment No. 1).
2. During the pre-site walk interview and records review, Ms. Harrison declined the inspectors request to look at the SWPPP binder that she had with her during the interview. Failure of Ms. Harrison to allow the inspectors to review the SWPPP records maintained onsite is a violation of section XXI.H. Duty to Provide Information, section XXI.I Inspection and Entry, and section XXI.J Records Retention of the Industrial General Permit. The inspectors told Ms. Harrison that

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the SWPPP, which is not dated, and 2003 site map that are uploaded to Storm Water Multiple Application and Report Tracking System (SMARTS) are both outdated and deficient. The SWPPP that is uploaded to SMARTS has a fax transmittal date of February 4, 2015 on it, and has the July 2003 site map attached as well as two April 2000 hazardous wastes inventory sheets. Ms. Harrison provided a 2011 site map during the interview. No noticeable changes had been made to the 2011 site map from the 2003 site map. Ms. Harrison could not provide employee training logs, monitoring logs, housekeeping logs, hazardous waste disposal receipts and manifests during the inspection. Ms. Harrison stated that oil changes are not done onsite. However, the SWPPP that is uploaded to SMARTS states on page 1, Facility Activities, that "most truck maintenance is done on site, however, some truck maintenance is done offsite by Rush Peterbilt and Hawthorne Machinery Co."

Ms. Harrison stated that HTI is no longer in operation. The current business in operation at the site is Irwindale Equipment Corporation (IEC). IEC is not included in the SWPPP or site map. Ms. Harrison submitted a Notice of Termination on October 8, 2015 for HTI with the basis identified as "new owner/operator" which was identified as IEC, owner Susanne Harrison. There is no Notice of Intent (NOI) on file for IEC. HTI is identified on the signage at the facility entrance (see Photo 2).

3. During the site walk portion of the inspection, San Diego Water Board inspectors made the following observations:
 - a. Trucks leaking oil into gravel and soil (Photos 3, 5, 6, 7, and 42). No drip pans observed during the inspection, however weathered poly tarps were placed under the engines of several trucks.
 - b. A container of diesel fuel was sitting on the ground without secondary containment (Photo 4).
 - c. 55 gallon drums containing hazardous waste (labeled "Harrison Trucking") were sitting outside on the ground without secondary containment (Photos 8 through 11).
 - d. Rusty metal parts and other wastes located outside of the shop and exposed to storm water (Photo 17).
 - e. Tooling activities conducted outside under an umbrella (Photo 18).
 - f. Greasy rags in a dumpster (Photo 23). Ms. Harrison directed an employee to remove rags from the dumpster immediately. The employee removed the greasy rags during the inspection.
 - g. Nuts, bolts, wiring, and rusty lug nuts were on the ground throughout the trailer storage lot and on a truck hitch frame (Photos 28 and 31).
 - h. Old roll off dumpster containing rusty truck parts, brake assemblies, and brake pads (Photos 25 and 26). The roll off dumpster is partially covered with a weathered and unsecured poly tarp (Photo 25).The

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poly tarp is not an adequate form of cover to eliminate exposure to storm water.

- i. Evidence of oil changes being conducted onsite. Used oil filters and waste oil storage containers observed in shop buildings and on secondary containment trays (Photos 12 through 16, and 22).
 - j. Absorbent material seen on the ground under leaking trucks inside of shop and outside onsite (Photos 21 and 42).
 - k. Wheel hubs on inoperative HTI trucks onsite are leaking lubricating oil (Photo 29).
 - l. HTI trucks are parked onsite with engine compartment covers off and exposed to storm water (Photos 32 and 33).
 - m. Storage of out of service trailers onsite. Many of the trailers do not have tires on them (Photo 34).
 - n. Gravel piles, sand piles, and abandoned materials in small trailers are being stored on site. (Photo 35).
 - o. Fresh oil stains on concrete (Photos 27 and 37).
 - p. Empty antifreeze containers, brake fluid containers, and used oil filters left on parked trailers on site (Photos 38 through 40).
 - q. What appears to be a storm water sump/vault in center of site contains stagnant water with organic debris (i.e., leaves). Ms. Harrison referred to this as "swamp water" (Photos 41 through 43).
 - r. IEC trucks on site leaking oil (Photos 3, 5, and 21).
4. During the post inspection exit interview, San Diego Water Board inspectors asked Ms. Harrison to:
- a) Immediately correct all BMP violations;
 - b) Update the SWPPP and site map to include IEC;
 - c) Upload the SWPPP and site map to SMARTS;
 - d) Upload to SMARTS all waste disposal manifests and receipts; and
 - e) File a Notice of Intent (NOI) for IEC.

San Diego Water Board inspectors also advised Ms. Harrison that as long as the Harrison Trucking, Inc. NOI is active, HTI is required to comply with the Industrial General Permit, and that continued failure to comply with the Industrial General Permit may result in substantial monetary penalties.

5. The City of Santee conducted compliance inspections of HTI on March 21, 2017, March 24, 2017, and March 28, 2017. As a result of finding the site in violation of local ordinances, on March 28, 2017, the City of Santee issued HTI a Storm Water Inspection Notice to Take Corrective Actions on multiple violations. The San Diego Water Board inspectors were copied on the City of Santee's inspection findings on April 10, 2017.

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Based on the San Diego Water Board inspectors observations during their April 11, 2017 inspection, HTI has not taken corrective actions on the violations cited by the City of Santee.

RECOMMENDATIONS AND ADDITIONAL COMMENTS

1. San Diego Water Board staff has entered all identified violations into SMARTS and recommends further enforcement action due to the Discharger's continued failure to comply with the IGP reporting requirements, and failure to implement and maintain the following BMPs:
 - a. Collect, contain and properly dispose of industrial wastes and hazardous wastes that have accumulated on the site.
 - b. Use drip pans under all leaking vehicles.
 - c. Provide adequate cover and secondary containment BMPs for all inoperative trucks, engines, transmissions, brakes, other vehicle parts, antifreeze containers, brake fluid containers, used oil filters, and 55 gallon drums of waste oil.
 - d. Clean up the site, including removal and proper disposal of all trash, contaminated soil, and contaminated gravel.
 - e. Upload to SMARTS an updated SWPPP, updated site map, employee training logs, monitoring logs, housekeeping logs, hazardous waste disposal manifests and receipts.
 - f. Provide receipts and invoices, as requested by the San Diego Water Board inspectors, for all offsite oil changes, as well as receipts for drip pans that Ms. Harrison said have been ordered.
2. The San Diego Water Board inspectors advised Ms. Harrison that the Notice of Termination (NOT) submitted for HTI would not be approved until the site meets the Industrial General Permit requirements for termination.
3. San Diego Water Board inspectors advised Ms. Harrison that a NOI will be required to enroll IEC under the Industrial General Permit.
4. Based on observations during the San Diego Water Board's April 11, 2017 site inspection that showed HTI's industrial materials and wastes (trucks, trailers, parts, waste oil, etc.) are still on site and exposed to storm water, San Diego Water Board inspector Ms. Ghoram denied HTI's request for termination of coverage under the Industrial General Permit.

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Facility:	Harrison Trucking Incorporated	
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SIGNATURE SECTION

Whitney Ghoram, SEA		4-11-2017
STAFF INSPECTOR	SIGNATURE	INSPECTION DATE
Roger Mitchell, PG		4-11-2017
STAFF INSPECTOR	SIGNATURE	INSPECTION DATE
Laurie Walsh, PE		5-11-17
REVIEWED BY SUPERVISOR	SIGNATURE	DATE

SMARTS:

Tech Staff Info & Use	
Order No.	2014-0057-DWQ
NPDES No.	CAS000001
ECM Pin/Place ID	SM-229747
WDID	9 371003651
Inspection ID	2033399
Violation ID (Inadequate BMPs)	862982
Violation ID (Insufficient SWPPP)	863087
Enforcement ID	425931

Attachment No. 1- Harrison Trucking Incorporated Inspection Photos, WDID 9 371003651





Photo #5- Additional views of leaking Irwindale Equipment Company truck. Tarp is not an adequate BMP. Drip pans should be used.



Flat tire is indicative of non-operational status of truck, neglect, and lack of maintenance.

Photo #6- Leaking truck oil in gravel. Poor BMPs. Failure to use drip pans.



Harrison Trucking /Irwindale Equipment Corp
8801 Olive Lane, Santee
WDID 9 371003651

Exhibit 1
Inspection Date: April 11, 2017
Inspector: Whitney Ghoram, Roger Mitchell
San Diego Water Board



Photo #7- Leaked oil in gravel.

Photo #8- Hazardous waste label dated 03/20/2017 shows Harrison Trucking. Drum lacks secondary containment.

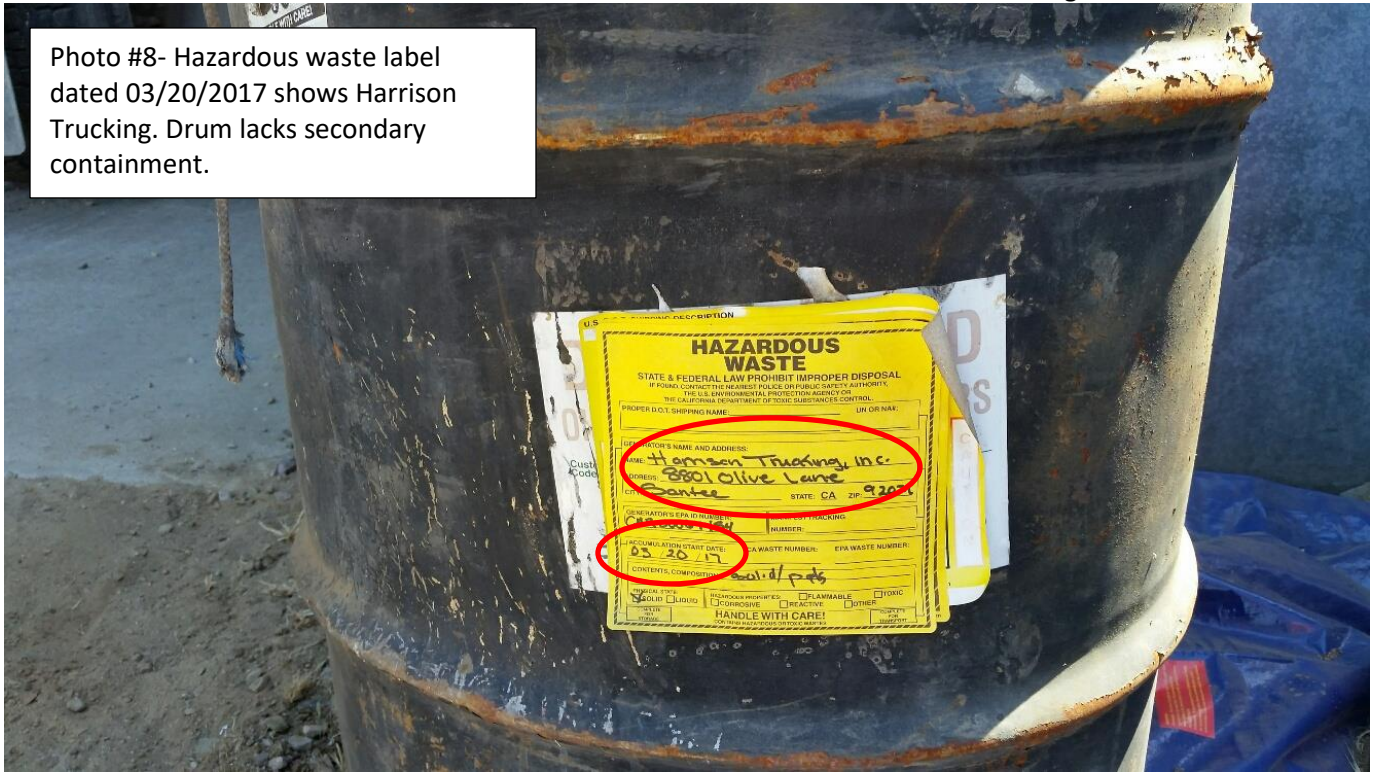


Photo #9- Improperly stored drums containing waste oil. Drums are not level, tip over hazard. Lacking secondary containment & secured lids.



Photo #10- Hazardous waste label dated 03/01/2017 shows Harrison Trucking.



Photo #11- Hazardous waste label dated February 2017 shows Harrison Trucking.

Photo #12- Maintenance shop with 5 gallon buckets of fluids & 55 gallon drum of waste oil without secondary containment.

Pump assembly with hoses to transfer oil from 55 gallon drum to shop storage unit.



Photo #13- Waste oil storage containers. Poor BMPs- oil on floor and surfaces of containers.



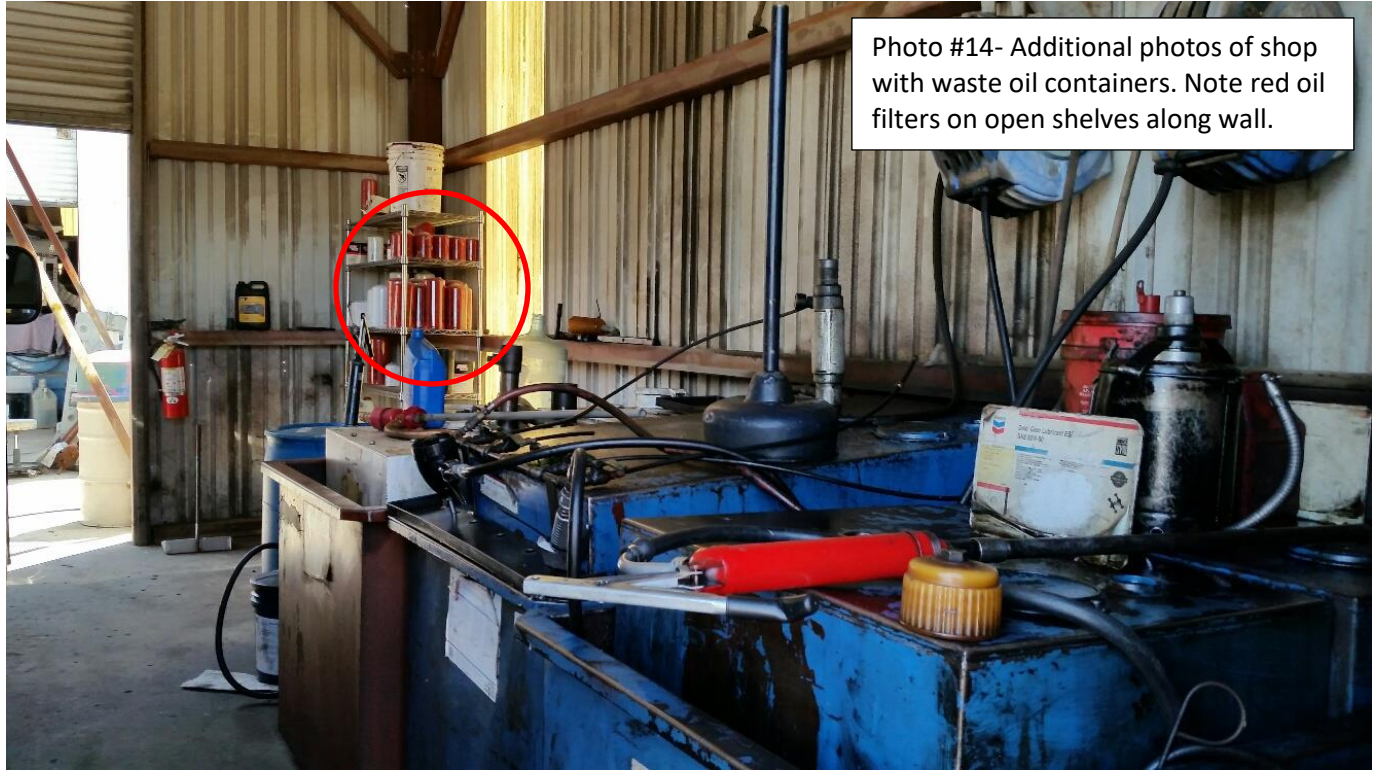


Photo #14- Additional photos of shop with waste oil containers. Note red oil filters on open shelves along wall.

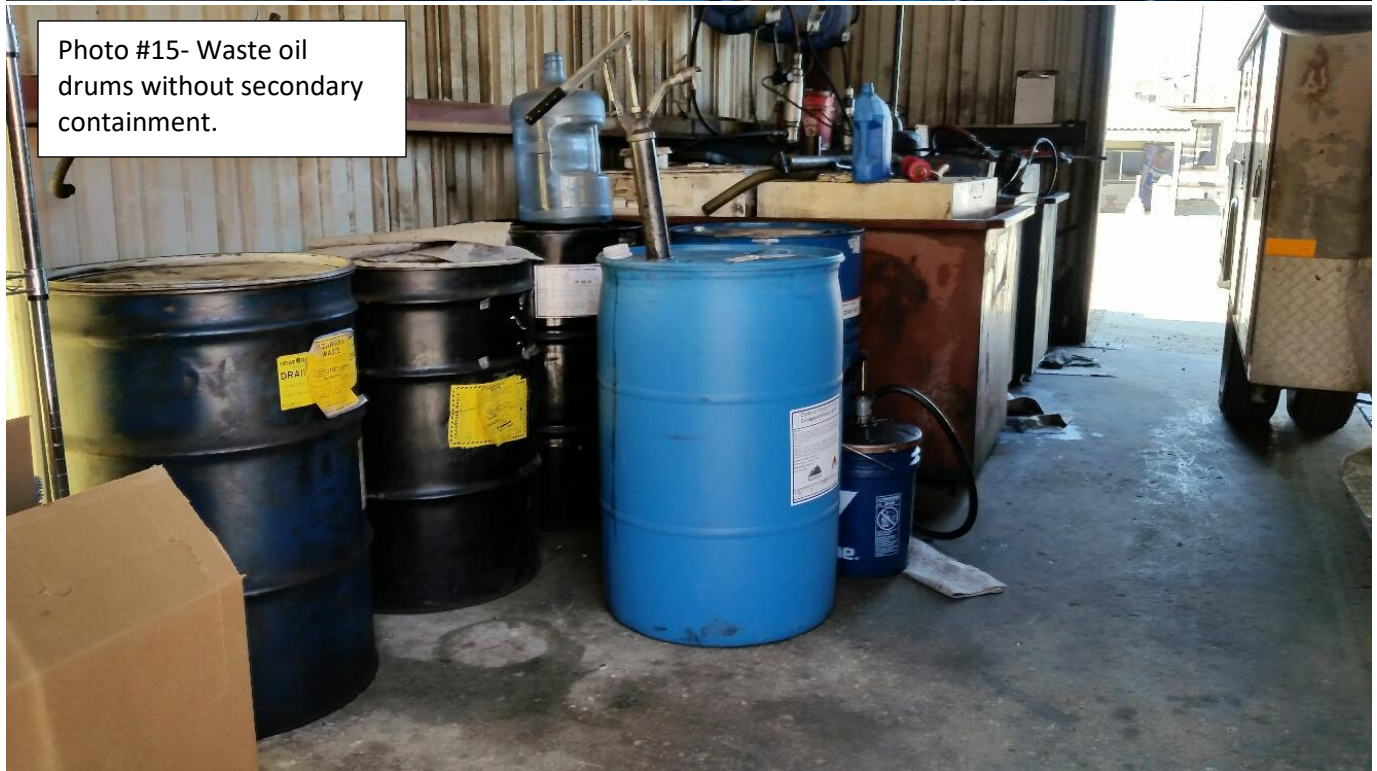


Photo #15- Waste oil drums without secondary containment.

Photo #16- Used oil filters on containment tray. 5 gallon buckets without secondary containment. Contents and/or previous contents of buckets unknown.



Used red oil filters are same/similar to red oil filters on open shelf in previous photo. It is unclear as to why there would be these used oil filters at the facility when Susanne Harrison stated that oil changes are not performed at the facility.

Photo #17- Rusty metal parts and other wastes exposed outside of shop. Unclear as to why a license plate would be with these materials.

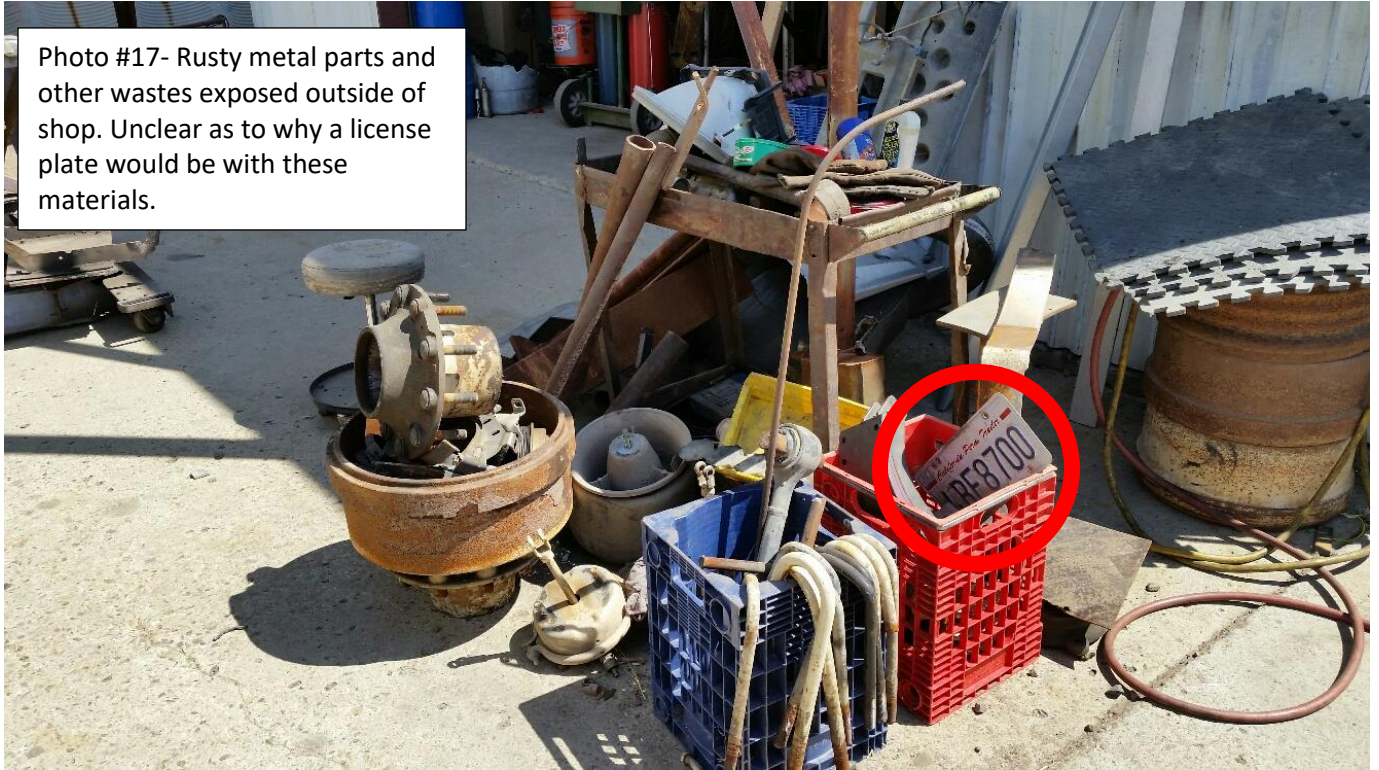
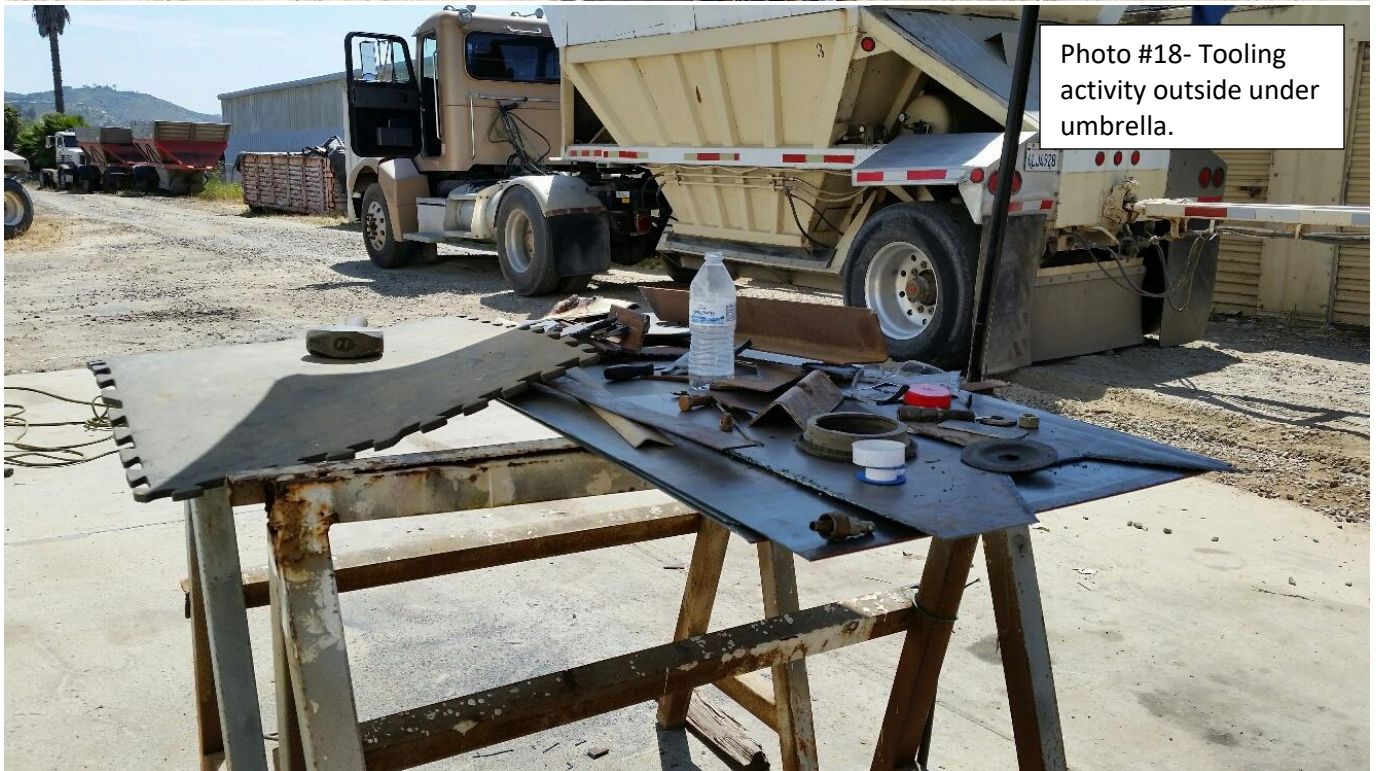


Photo #18- Tooling activity outside under umbrella.



Photos #19 & #20-
Labeled and closed
containers of clean &
dirty absorbent.



Photo #20



Photo #21- Absorbent on spilled/leaked oil under IEC truck that appears to be in servicing/maintenance. Drip pans should be used. Note red oil filter on the truck.



Photo #22- Used oil filters on shop bench.

Photo #23- Greasy rags in general trash bin. The rags were removed from the bin during the inspection.



Photo #24- Operating truck with Irwindale Equipment Corp logo.



Photo #25- Roll off bin containing truck parts including brakes. Poly tarp is not adequate cover. Exposure of truck parts.



Photo #26- Close up view of materials identified in roll off bin photo above.



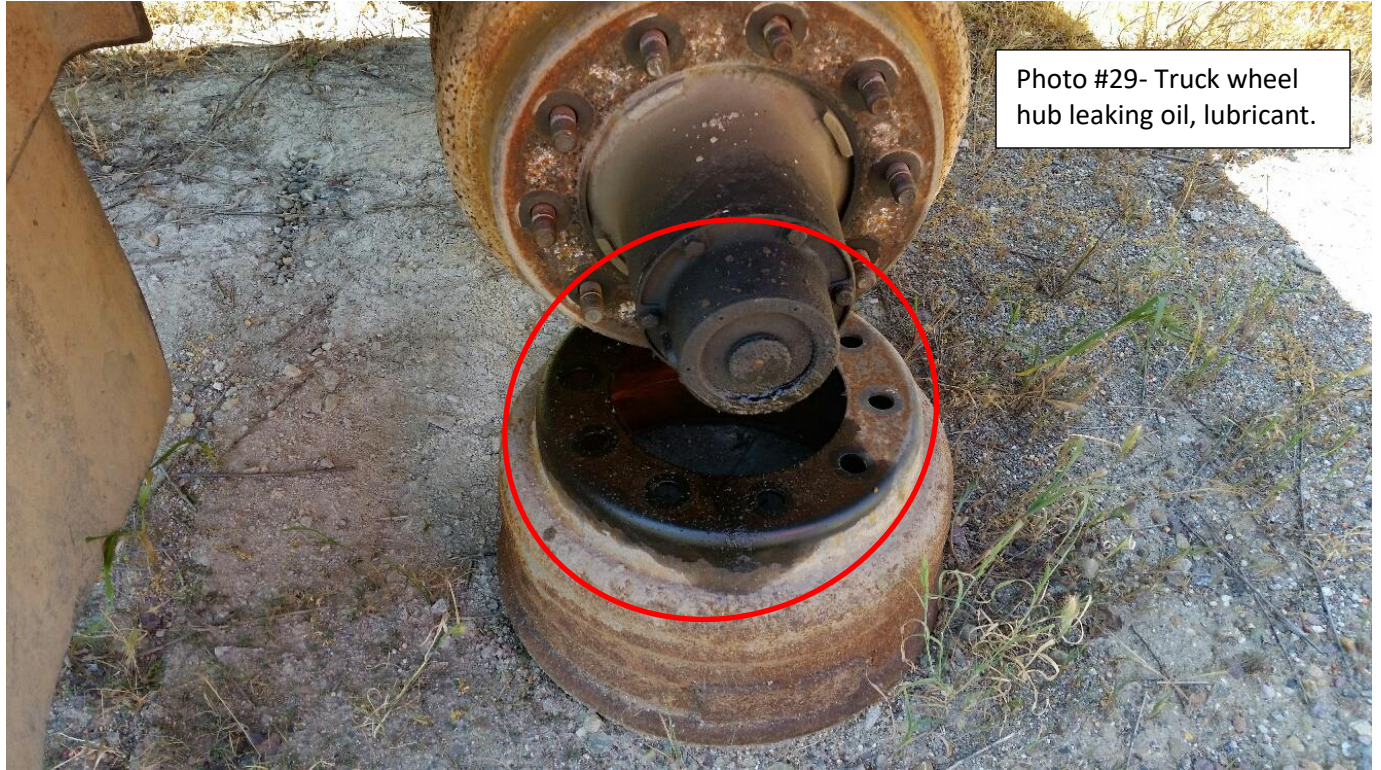


Photo #29- Truck wheel hub leaking oil, lubricant.



Photo #30- Harrison Trucking International (HTI) truck with rusted and oily parts on it. See close up photo below.

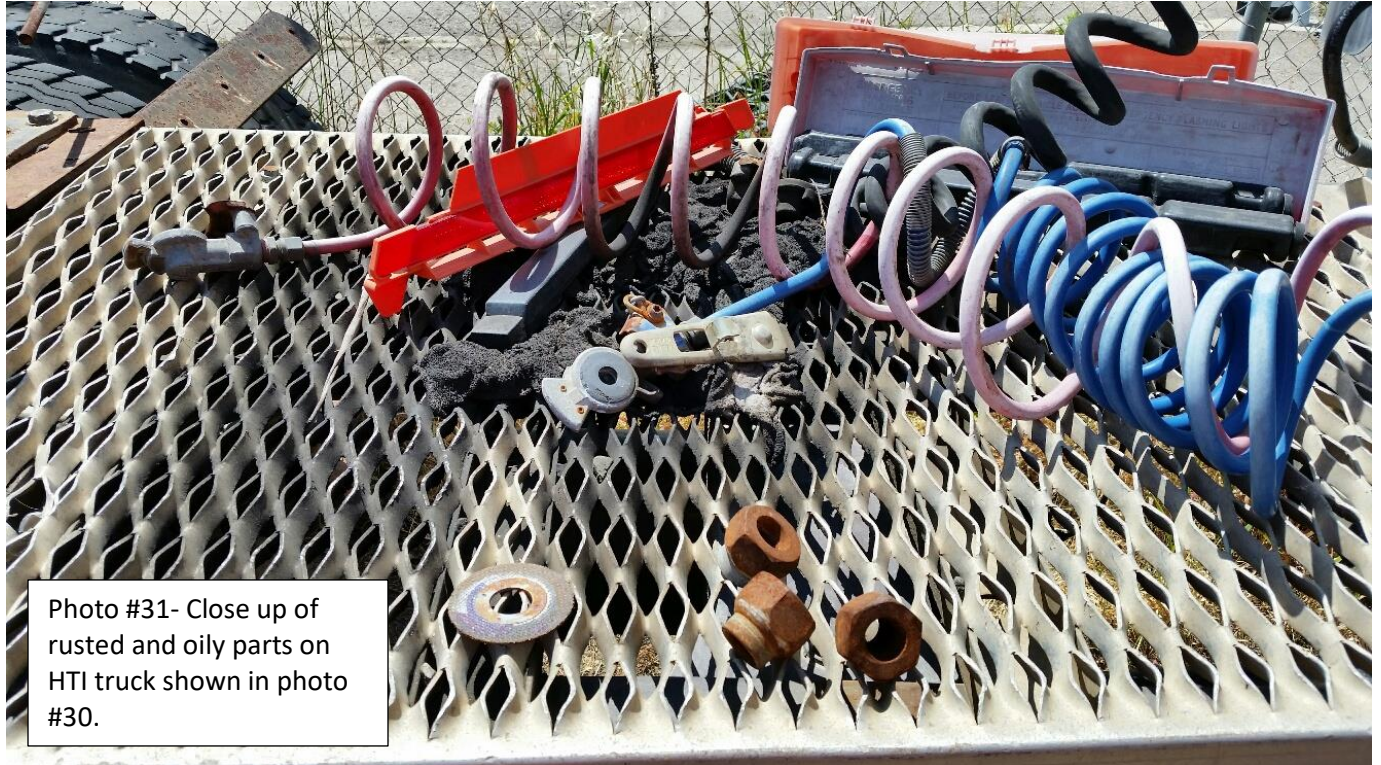


Photo #31- Close up of rusted and oily parts on HTI truck shown in photo #30.



Photo #32- Out of service HTI truck with exposed engine compartment.



Photo #33- Out of service HTI truck storage. Exposed engine compartment. No drip pan under truck.



Photo #34- Out of service trailer storage. None of the trailers have tires on them.





Photo #37- Spilled oil on concrete.



Photo #38- Poor housekeeping BMPs. Improper storage & disposal of antifreeze container.



Photo #39- Improper storage/disposal of oil filter. Poor BMPs.



Photo #40- Improperly storage/disposal of brake fluid container and antifreeze containers.



Photo #41- Standing water in vault sump.



Photo #42- Large quantity of absorbent under truck. Note close proximity to vault/sump.

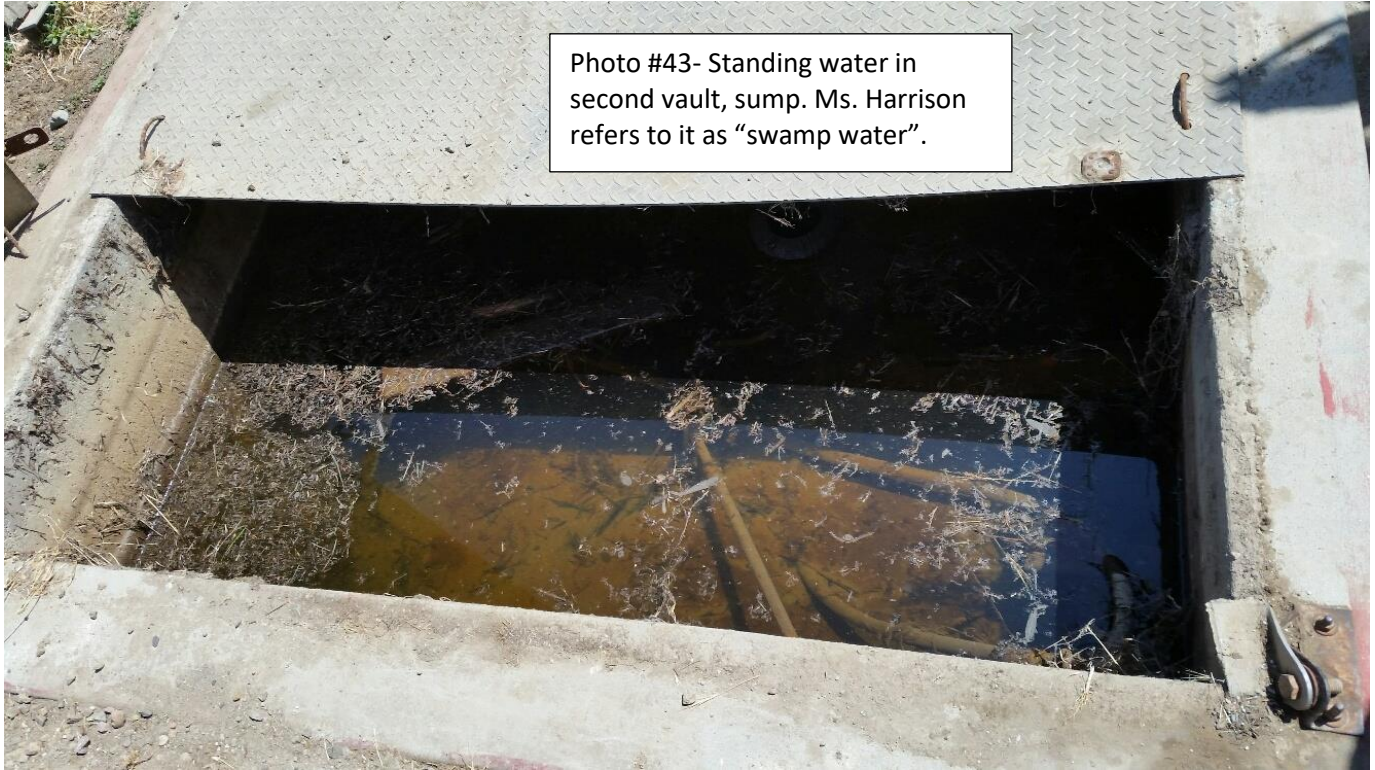


Photo #43- Standing water in second vault, sump. Ms. Harrison refers to it as "swamp water".



Photo #44- Use of poly tarp is unacceptable. Drip pan required for leaking equipment.





Photo #46- HTI site
and trucks

Direction of drainage
from HTI site.