

**California Environmental Protection Agency
State Water Resources Control Board**

REPORT TO LEGISLATURE

Per California Water Code Chapter 5.5 Section 13385 (o)

Enforcement Activities of the Regional Water Quality Control Boards -2002

January 2003

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

13385. Civil Liability

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

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

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

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

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

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

Executive Summary

This report summarizes information regarding violations of waste discharge requirements for discharges to surface water and about the formal and informal enforcement actions taken by the Regional Water Quality Control Boards in response to those violations. The report addresses only discharges to surface water because it has been prepared pursuant to Chapter 5.5 of the California Water Code. Chapter 5.5 implements provisions of the Federal Water Pollution Control Act and establishes a regulatory program for discharges to surface water only. This report also contains an analysis of current enforcement policies, and includes recommendations for improvements.

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

Two major findings of this report regarding violations and enforcement actions are: (1) Data quality problems persist and the backlog of violations not yet entered into the data system continues to be significant due to the continued reliance on manual review and data entry; (2) Despite the data quality issues, there appears to be a significant reduction, (possibly as high as 33%) in the number of violations being reported at NPDES facilities. This conclusion is based on input from RWQCB enforcement coordinators and analysis of the data presented in this report.

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

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 and twelve regional offices 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 (With Offices in Redding 5R, Sacramento 5S and Fresno 5F)
- Region 6 – Lahontan RWQCB (With offices in South Lake Tahoe 6A and Victorville 6B)
- Region 7 – Colorado River Basin RWQCB
- Region 8 – Santa Ana RWQCB
- Region 9 – San Diego RWQCB

As of January 13, 2003 there are, statewide, 2,616 active facilities regulated under NPDES Waste Discharge Requirements. These facilities are divided into two categories:

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

The Waste Discharge Requirements (also called “permits”) are either issued as individual permits or as SWRCB or RWQCB general permits. Dischargers who are eligible for coverage under a general permit must enroll and agree to comply with the conditions of the general permit.

A summary of active NPDES facilities by category and RWQCB is shown in the following table.

Table 1 NPDES facilities by category and Regional Office

REGIONAL OFFICE	MAJOR FACILITIES			MINOR FACILITIES			Total
	GENERAL Permit Enrollees	INDIVIDUAL Permits	Total	GENERAL Permit Enrollees	INDIVIDUAL Permits	Total	
1	2	16	18	19	37	56	71
2	4	57	61	172	66	238	295
3	6	21	27	65	31	96	117
4	8	41	49	541	157	698	739
5F	1	7	8	3	47	50	57
5R	1	13	14	14	62	76	89
5S	4	39	43	118	81	199	238
6A	3	1	4	18	4	22	23
6B	4	1	5	13	7	20	21
7	5	13	18	39	18	57	70
8	7	19	26	693	37	730	749
9	23	25	48	82	24	106	147
Total	68	253	321	1,777	571	2,348	2,616

*Data compiled on January 13, 2003

As required, this report identifies violations that occurred on or between January 1, 2002 and December 31, 2002. The data should not be considered complete, particularly data for the fourth quarter. The NPDES program requires dischargers to periodically monitor their effluent and to report the results to the Regional Board in self-monitoring reports. Typically, those reports are due to the RWQCB 30 to 45 days after the end of the month for which the monitoring was done. This allows for laboratory analysis and transmittal of data. As a result, violations which occur in October are normally not known and recorded in the tracking database until at least the following January or later. Except for reports that are submitted electronically to the San Francisco Bay RWQCB, staff must then review the reports, identify the violations and enter them into the data system. The time lag for this process varies, but can be significant. For example, at this time last year there were 3,022 violations that occurred in the year 2001 entered into the database. At the time this report was prepared that number had risen to 4,933 violations as the RWQCBs strive to address the manual data entry backlog.

The following table lists the total number of violations of NPDES waste discharge requirements, by regional board office for each of the past three years. The table shows a dramatic decrease in the number of violations over that period. The SWRCB believes the decrease in violations is real although, due to the lag in data entry, the magnitude of that reduction is uncertain. Most RWQCB enforcement coordinators report that their dischargers have taken steps to increase compliance rates in order to avoid mandatory minimum penalties.

Table 2: Violations of NPDES Waste Discharge Requirements

Violations of NPDES Waste Discharge Requirements			
Regional Office	2000	2001	2002
1	886	457	147
2	536	443	174
3	319	440	308
4	1,336	892	125
5F	469	784	582
5R	241	71	67
5S	1,184	571	333
6A	10	11	15
6B	5	7	10
7	196	252	208
8	510	394	149
9	1,756	611	167
Total	7,448	4,933	2,285

* Data compiled on January 13, 2003.

The following table lists the total number of violations of NPDES waste discharge requirements, by regional board office for each calendar quarter in 2002. The lag in data entry is clearly shown in that the 4th quarter is one quarter of the 1st..

Table 3: Compilation of violations of WDR by quarter for 2002

Violations of NPDES Waste Discharge Requirements					
Regional Office	Qtr 1 1/1/02 - 3/31/02	Qtr 2 4/1/02 - 6/30/02	Qtr 3 7/1/02 - 9/30/02	Qtr 4* 10/1/02 - 12/31/02	Total for 2002
1	61	40	36	10	147
2	68	44	43	19	174
3	59	95	96	58	308
4	61	30	19	15	125
5F	243	238	81	20	582
5R	20	16	14	17	67
5S	107	110	97	19	333
6A	5	3	3	4	15
6B	5	2	1	2	10
7	79	56	39	34	208
8	56	32	41	20	149
9	66	56	41	4	167
Total	830	722	511	222	2,285

* Data compiled on January 13, 2003. The 4th Quarter data is assumed to be incomplete.

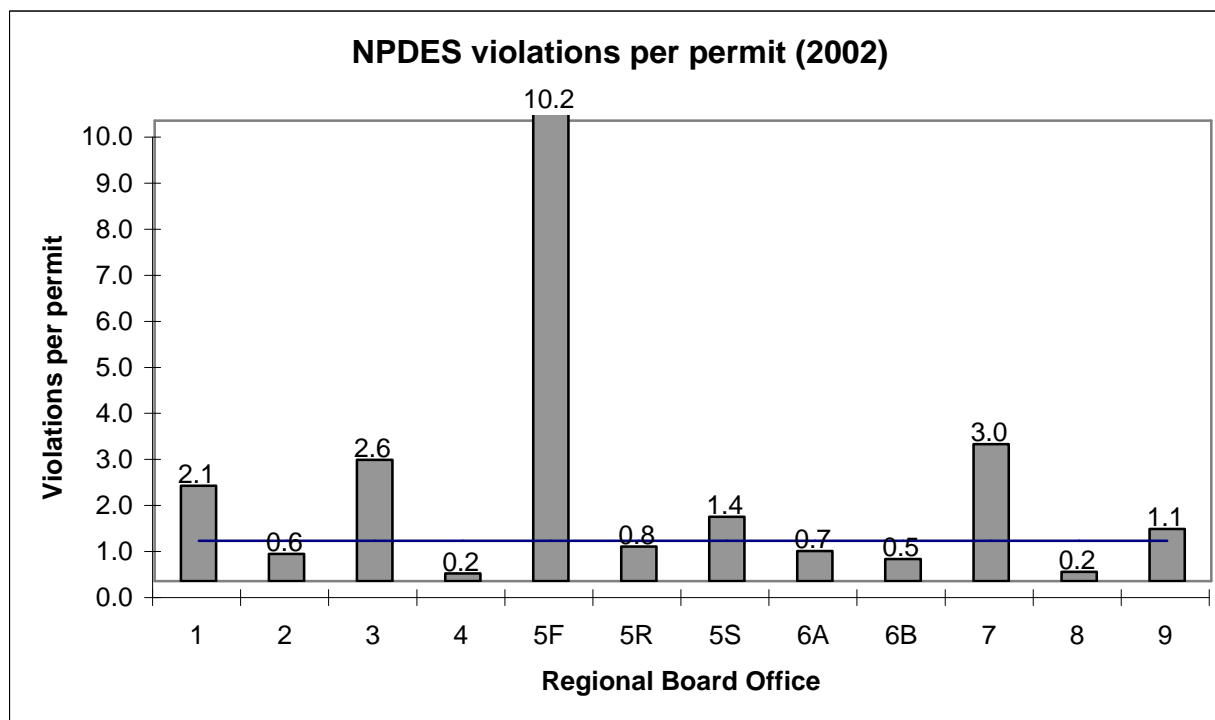
A comparison of the number of violations by Region and the number of facilities regulated in that Region is provided in the table below. The data indicate an uneven distribution of the average number of violations per facility among the different Regional Board offices. The reasons for this inconsistency include facility-specific requirements in waste discharge requirements and inconsistent processes and priority assigned to report review and data entry.

Table 4: Number of violations per facility for 2002.

Number of Facilities Compared to Number of NPDES Violations			
Regional Board Office	NPDES Facilities	Total Violations	Violations per facility
1	71	147	2.1
2	295	174	.6
3	117	308	2.6
4	739	125	.2
5F	57	582	10.2
5R	89	67	.8
5S	238	333	1.4
6A	23	15	.7
6B	21	10	.5
7	70	208	3.0
8	749	149	.2
9	147	167	1.1
Total	2,616	2,285	Weighted Average: .9

* Data compiled on January 13, 2003.

Figure 1: NPDES violations per permit for 2002.



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 (e.g. Agriculture).

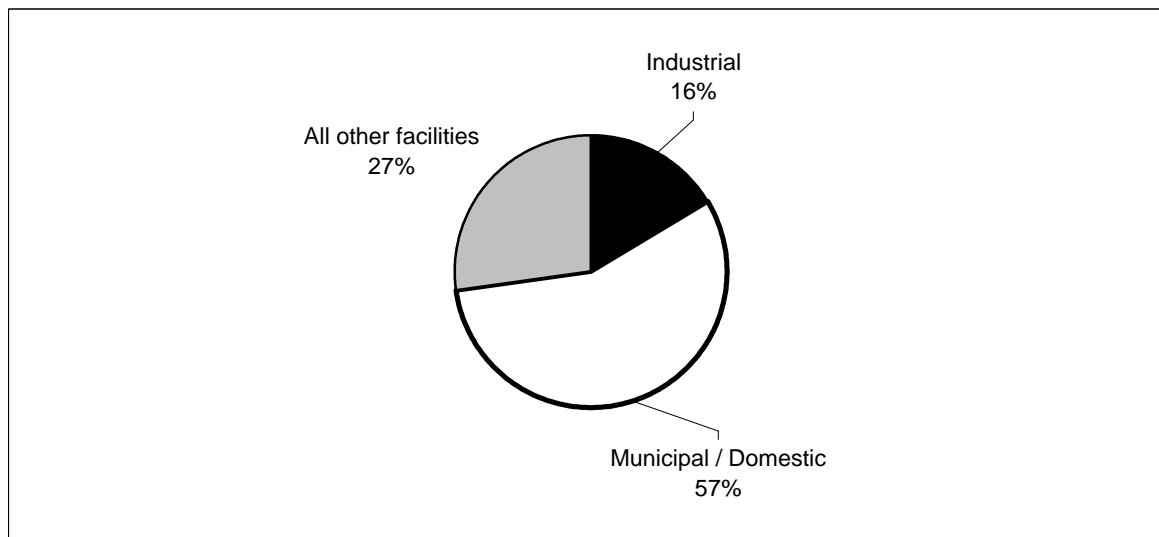
NPDES violations for 2002 are displayed by Regional Board office and type of facility in the following table.

Table 5: NPDES violations by facility waste type.

NPDES Violations by Facility Waste Type				
Regional Board Office	Industrial	Municipal / Domestic	All other facilities	Total
1	12	132	3	147
2	60	110	4	174
3	11	287	10	308
4	11	9	105	125
5F	97	216	269	582
5R	33	25	9	67
5S	68	260	5	333
6A	0	10	5	15
6B	0	7	3	10
7	17	149	42	208
8	28	40	81	149
9	40	38	89	167
Total	377	1283	625	2,285
Percent of Total	16%	56%	27%	

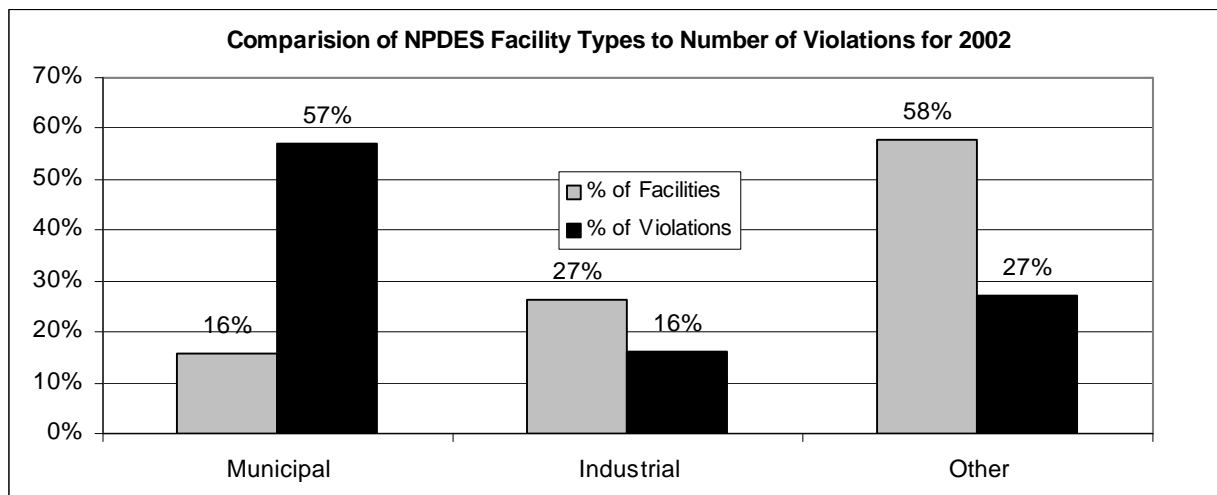
The chart below shows the distribution of violations for each facility waste type for the whole State. The majority of violations statewide occurred at Municipal/Domestic facilities.

Figure 2: Violations by Facility Waste Type



Municipal waste facilities account for approximately 16 percent of the NPDES facilities overall. The chart below indicates that violations at municipal waste facilities’ represent a disproportionate percentage of the total violations. It should be noted that municipal facilities generally analyze for more constituents and at a greater frequency than other types of facilities. Higher numbers of violations from facilities that sample more frequently may not indicate a higher water quality problem.

Figure 3: Comparison of NPDES facility types to number of violations for 2002.



* Data compiled on January 13, 2003.

Available data also enable violations to be displayed 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 Entities

The following table shows the violations by agency type and Region for 2002.

Table 6: NPDES violations by agency type.

NPDES Violations by Agency Type								
Regional Office	City Agency	County Agency	Federal Agency	Government Agency Combination	Private Entity	Special District	State Agency	Total
1	67	0	0	1	12	65	2	147
2	81	3	0	2	63	24	1	174
3	140	1	0	36	53	20	58	308
4	7	15	3	0	98	2	0	125
5F	48	0	3	0	374	145	12	582
5R	14	3	0	0	39	9	2	67
5S	107	43	1	0	60	51	71	333
6A	0	0	0	0	4	10	1	15
6B	0	0	0	0	2	7	1	10
7	46	0	12	0	44	104	2	208
8	15	2	0	0	97	35	0	149
9	50	0	12	0	75	15	15	167
Total	575	67	31	39	921	487	165	2,285

* Data compiled on January 13, 2003.

The distribution 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 60 percent of the NPDES violations.

An important distinction to consider when evaluating the violation data presented below is that not all violations are equivalent. Violations vary from not submitting monitoring reports to acute toxicity violations. The RWQCBs identify priority violations based on the criteria identified in the SWRCB Water Quality Enforcement Policy (Resolution No. 2002-0040). A priority violation represents a greater threat to water quality than other violations. A breakdown of the violation types and the number of those violations that are identified as priority violations is presented in the table below. A more detailed description of each violation category is provided in Attachment No. 2.

Figure 4: NPDES Violations by Agency type

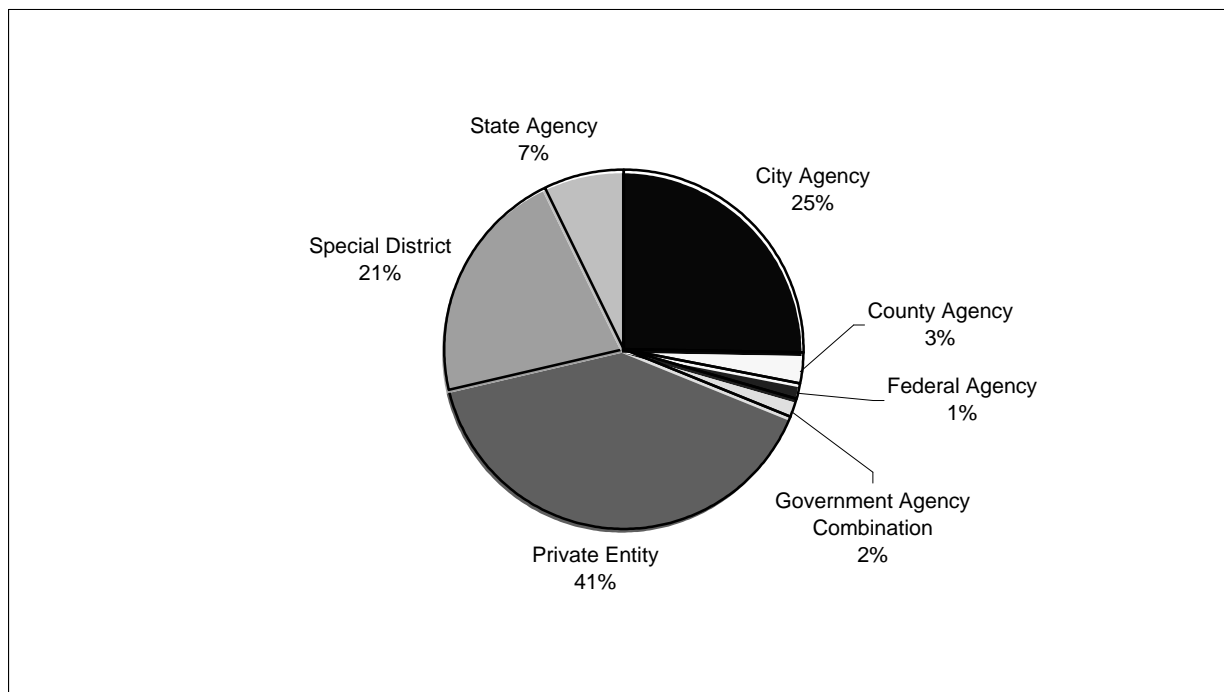


Figure 5: Comparison of violations by agency types.

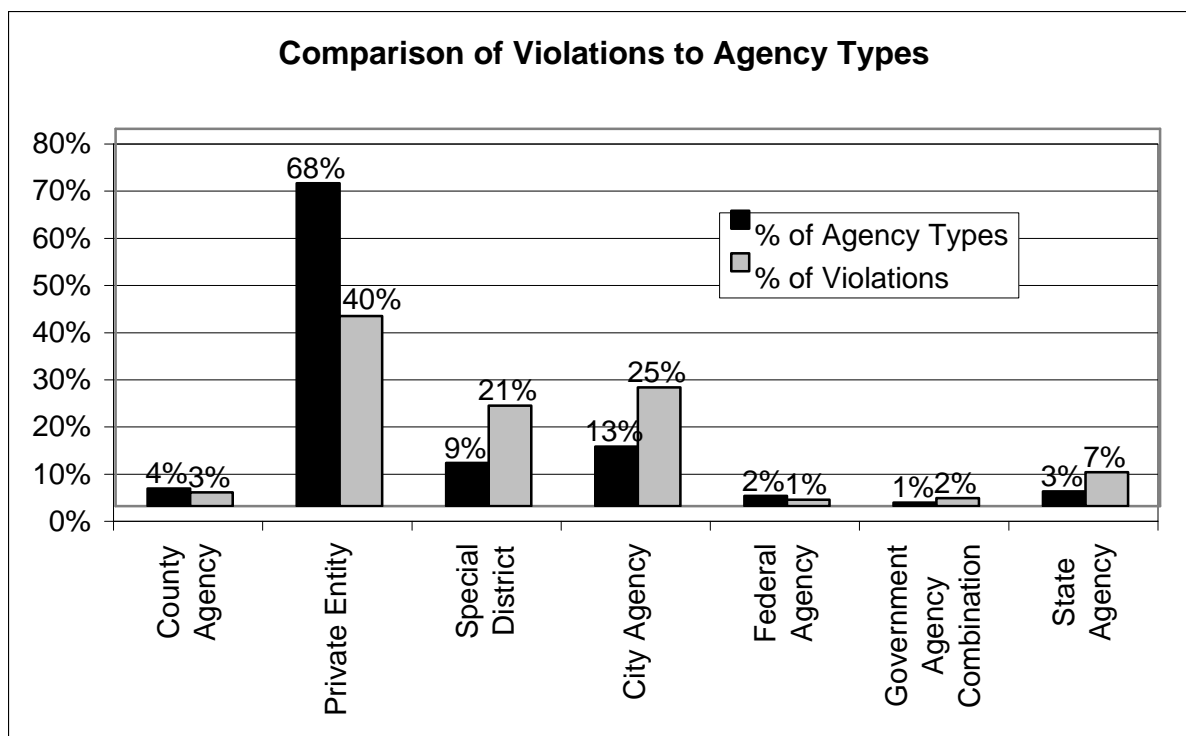


Table 7: NPDES violations by category for 2002.

NPDES Violations by Category for 2002					
Description of Violation Category	Total Violations		Priority Violations		
	Number	%	Number	% of Total Priority	% of Total Violations
Category 1 Pollutant	647	28.3%	227	70.9%	9.9%
Other Effluent Violation	593	26.0%	3	0.9%	0.1%
Failure to submit Reports or Report is Deficient	533	23.3%	5	1.6%	0.2%
Sanitary Sewer Overflow	156	6.8%	5	1.6%	0.2%
Category 2 Pollutant	121	5.3%	55	17.2%	2.4%
Violation of Non-Effluent Permit Condition	99	4.3%	5	1.6%	0.2%
Acute Toxicity	53	2.3%	6	1.9%	0.3%
Chronic Toxicity	42	1.8%	14	4.4%	0.6%
Unregulated Discharge	28	1.2%		0.0%	0.0%
Compliance Schedule	7	0.3%		0.0%	0.0%
Failure to Notify Per Requirement	3	0.1%		0.0%	0.0%
Failure to Obtain Permit	1	0.0%		0.0%	0.0%
Failure to Pay Fees	1	0.0%		0.0%	0.0%
Basin Plan Prohibition	1	0.0%		0.0%	0.0%
Total	2,285		320	100.0%	14.0%

*Data compiled on January 13, 2003.

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

Enforcement actions taken as a result of a violation are classified as either informal or formal. An informal enforcement action is any enforcement action taken by SWRCB or RWQCB staff that is not defined in statute. Formal enforcement actions are statutorily recognized actions to address a violation or threatened violation of water quality laws, regulations, policy or orders.

Table 8: Types and classification of enforcement actions.

Type of Enforcement Action	Description	Classification
Verbal Communication	Any communication regarding the violation that takes place in person or by telephone.	Informal
Staff Enforcement Letter	Any written communication regarding violations and possible enforcement actions that is signed at the staff level.	Informal
Notice of Violation	A letter officially notifying a discharger of a violation and the possible enforcement actions, penalties, and liabilities that may result. This letter is signed by the Executive Officer.	Informal
Notice to Comply	Issuance of a Notice to Comply per Water Code Section 13399.	Formal
13267 Letter	A letter utilizing Water Code Section 13267 authority to require further information or studies.	Formal
Clean-up and Abatement Order	Any order pursuant to Water Code Section 13304.	Formal
Cease and Desist Order	Any order pursuant to Water Codes Sections 13301-13303.	Formal
Time Schedule Order	Any order pursuant to Water Code Section 13300.	Formal
Administrative Civil Liability (ACL) Complaint	ACL Complaint issued by the Executive Officer for liability pursuant to Water Code 13385.	Formal
Administrative Civil Liability (ACL) Order	An ACL Order that has been imposed by the 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 that, if not responded to, is followed by a formal enforcement action at a later time. The following table shows the number of violations for each quarter and the total for 2002. It also lists 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. It should be noted that there are fewer violations with enforcement actions as the year progresses because enforcement actions may take several months to be issued after the violation occurred.

Table 9: NPDES violations compared to enforcement actions.

NPDES Violations Compared to Enforcement Actions																				
	Qtr 1				Qtr 2				Qtr 3				Qtr 4				Total for 2002			
	1/1/02 - 3/31/02				4/1/02 - 6/30/02				7/1/02 - 9/30/02				10/1/02 - 12/31/02							
Regional Board Office	Total Violations	Total Violations without Enforcement Actions	Total Violations with Informal Enforcement Actions	Total Violations with Formal Enforcement Actions	Total Violations	Total Violations without Enforcement Actions	Total Violations with Informal Enforcement Actions	Total Violations with Formal Enforcement Actions	Total Violations	Total Violations without Enforcement Actions	Total Violations with Informal Enforcement Actions	Total Violations with Formal Enforcement Actions	Total Violations	Total Violations without Enforcement Actions	Total Violations with Informal Enforcement Actions	Total Violations with Formal Enforcement Actions	Total Violations	Total Violations without Enforcement Actions	Total Violations with Informal Enforcement Actions	Total Violations with Formal Enforcement Actions
1	61	46	12	4	40	37	2	1	36	36	0	0	10	9	1	0	147	128	15	5
2	68	48	7	13	44	37	4	4	43	31	3	9	19	17	0	2	174	133	14	28
3	59	30	24	6	95	84	8	3	96	87	10	0	58	53	5	0	308	254	47	9
4	61	2	59	9	30	2	29	1	19	0	18	2	15	0	14	1	125	4	120	13
5F	243	233	9	1	238	228	10	0	81	79	2	0	20	20	0	0	582	560	21	1
5R	20	11	9	2	16	6	10	1	14	11	3	0	17	11	6	0	67	39	28	3
5S	107	70	33	5	110	94	16	0	97	89	7	1	19	16	3	0	333	269	59	6
6A	5	4	1	0	3	3	0	0	3	3	0	0	4	2	2	0	15	12	3	0
6B	5	1	3	1	2	2	0	0	1	1	0	0	2	1	1	0	10	5	4	1
7	79	48	22	26	56	20	30	6	39	8	26	5	34	15	15	4	208	91	93	41
8	56	16	34	8	32	13	16	3	41	24	18	0	20	7	12	2	149	60	80	13
9	66	2	60	53	56	0	54	42	41	0	54	13	4	1	3	0	167	3	171	108
Totals	830	511	273	128	722	526	179	61	511	369	141	30	222	152	62	9	2285	1558	655	228
Percentages	62%	33%	15%		73%	25%	8%		72%	28%	6%		68%	28%	4%		68%	29%	10%	

* Data compiled on January 13, 2003.

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

Analysis of Current Enforcement Policies

1. Revised Water Quality Enforcement Policy

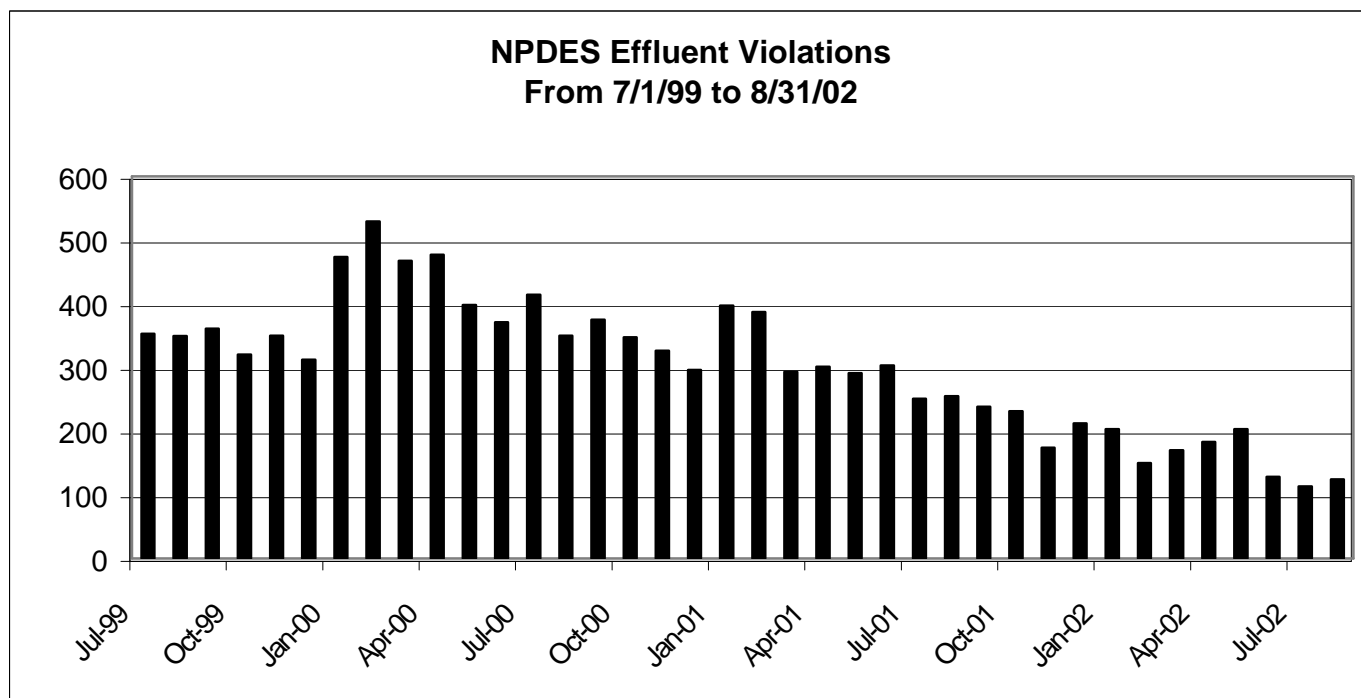
On February 19, 2002, the SWRCB adopted Resolution No. 2002-0040, rescinding Resolutions 96-030 and 97-085 and approving the revised Water Quality Enforcement Policy. The primary goal of the Water Quality Enforcement Policy is to create a framework for identifying and investigating instances of noncompliance, for taking enforcement actions that are appropriate in relation to the nature and severity of the violation, and for prioritizing enforcement resources to achieve maximum environmental benefits.

The Policy includes the following elements:

- An overview of water quality enforcement options.
- A process for identifying enforcement priorities and to assist in choosing the appropriate enforcement response.
- Provisions for more efficient use of standardized permit and enforcement order language.
- Information to assist in integrated enforcement efforts with other agencies.
- Procedures for response to fraudulent reporting or knowingly withholding data.
- Specific guidance regarding assessment of administrative civil liability, use of supplemental environmental projects and compliance projects, handling of criminal activities, guidance on what constitutes minor violations, and standards for violation and enforcement reporting.

2. Overall reduction in the number of violations at NPDES facilities.

The data indicate there has been an overall reduction in the number of violations at NPDES facilities. Figure 6 below plots total effluent limitation violations for each month starting in January 2000 and continuing until August 2002. From January 2000 forward, there is a gradual decrease in the number of effluent violations each month. Part of this decrease is due to the lag time between when the violation occurs and when it is entered into the system. We believe, however, that the reduction in the total number of effluent violations is also a result of increased compliance due to the deterrent effect of Mandatory Minimum Penalties.

Figure 6: NPDES effluent violations from 7/1/1999 to 8/31/2002.

3. Persistent data quality problems.

Careful review of the data presented here and in other, more comprehensive reviews (i.e., reviews that include non-NPDES dischargers) indicate that entry of violations is inconsistent between Regional Boards and has been significantly delayed in several Regions. We have experienced growing pains associated with the development and implementation of the compliance module of the SWIM database that now houses our violation and enforcement information. System bugs and design changes have frustrated data entry efforts and technical complexities associated with reporting capabilities have discouraged routine use of the available information. A team has been identifying and fixing bugs, resolving design problems, and developing training materials. Improved reporting capability, training, data quality assurance, and revised business processes that include data maintenance as a routine function are all needed as we mature in our data management capabilities. Even with these system improvements it is anticipated inconsistent and incomplete reporting will continue because of reliance on manual review and data entry of discharger monitoring information.

It is illustrative to identify two Region-specific factors that affect the reliability of data and that should be considered when evaluating apparent trends in violations:

- The Los Angeles RWQCB (Region 4) has an aggressive enforcement program. They have accumulated a very large backlog of violations that have been identified by student reviewers, but not yet verified by technical staff or entered into the data system. They have recently decided to redirect resources from other projects in order to eliminate this backlog within the next few months.
- Last year approximately one third (109 out of 312) of the violations in the San Diego RWQCB (Region 9) occurred at federal facilities. All RWQCBs have found it extremely difficult to prevail in enforcement against federal facilities. Region 9's efforts to compel

compliance continue, but its data entry for the numerous violations at federal facilities has been, at least temporarily, suspended. This has had a dramatic impact on the apparent trend of violations in that Region. Of the reported 167 violations reported by the San Diego RWQCB for 2002, only 7 occurred at federal facilities.

Analysis of Mandatory Minimum Penalties

1. Background and summary information.

The SWRCB and RWQCBs have been implementing the changes to Water Code Section 13385 by SB 709 (Statutes of 1999, Chapter 93) and SB 2165 (States of 2000, Chapter 80) . Included in these changes were statutes requiring the issuance of Mandatory Minimum Penalties (1) for “serious violations” and (2) for 4 or more violations occurring 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 violations subject to MMPs from January 1, 2000 through June 30, 2002. This table also details how many of those violations have received MMPs. The last six months of 2002 are excluded due to the time lag involved in identifying violations and issuing MMPs.

Attachment No. 3 lists 298 facilities with 4,669 total MMP violations. Attachment 3 also shows 49 percent of the nonexempt violations, or 2,284 of the 4,669 MMP violations listed, received an enforcement action equal or higher than the required minimum penalty. Generally, this level of enforcement can be explained by the following reasons:

- In anticipation of recent legislation, several RWQCBs delayed issuing MMPs so that the discharger would be allowed to direct part of the penalties toward supplemental environmental projects within their Regions;
- Several facilities that qualify as small communities with a financial hardship are cooperating with the Regional Board to design and implement facility upgrades. The Regional Board intends to direct the future MMP penalties toward these on-site compliance projects;
- An Administrative Civil Liability greater than the MMP is being prepared; or
- 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 downward and focused studies indicate that facilities are undertaking measures to return to, and remain in, compliance.

2. Case Studies.

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

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

The SWRCB is continuing to review these example facilities to determine what, if any, effect the issuance of MMPs has had regarding their compliance status. Two of the facilities previously reported have combined to become one discharger. Of the remaining seven facilities, one has had a major increase in compliance after receiving a MMP. Two facilities have had a moderate increase in compliance. The other four facilities have only seen a minor increase in compliance due to the long-term nature of the corrective action required.

Table 10: Case study of the compliance rate of 8 facilities receiving an MMP action.

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 planned prior to MMPs.	Moderate increase in compliance	Yes	No
Ragged Point Inn (3)	Since issuing the MMP in 2000, this facility has upgraded their treatment plant and hired a consultant to evaluate the possibility of near term elimination of their discharge. Violations have decreased due to increased permitted flow limit (increased under a revised permit), and improved treatment plant operations.	Moderate increase in compliance	Yes	Yes
California Men's Colony (3)	Assessed three MMPs: one for \$33,000, one for \$87,000, and in November 2002 one for \$45,000. Major \$20 million upgrade of the facility is still pending with ground breaking expected in Spring 2003, and final completion in 2004. Violations still continue.	Minor increase in compliance	No	No

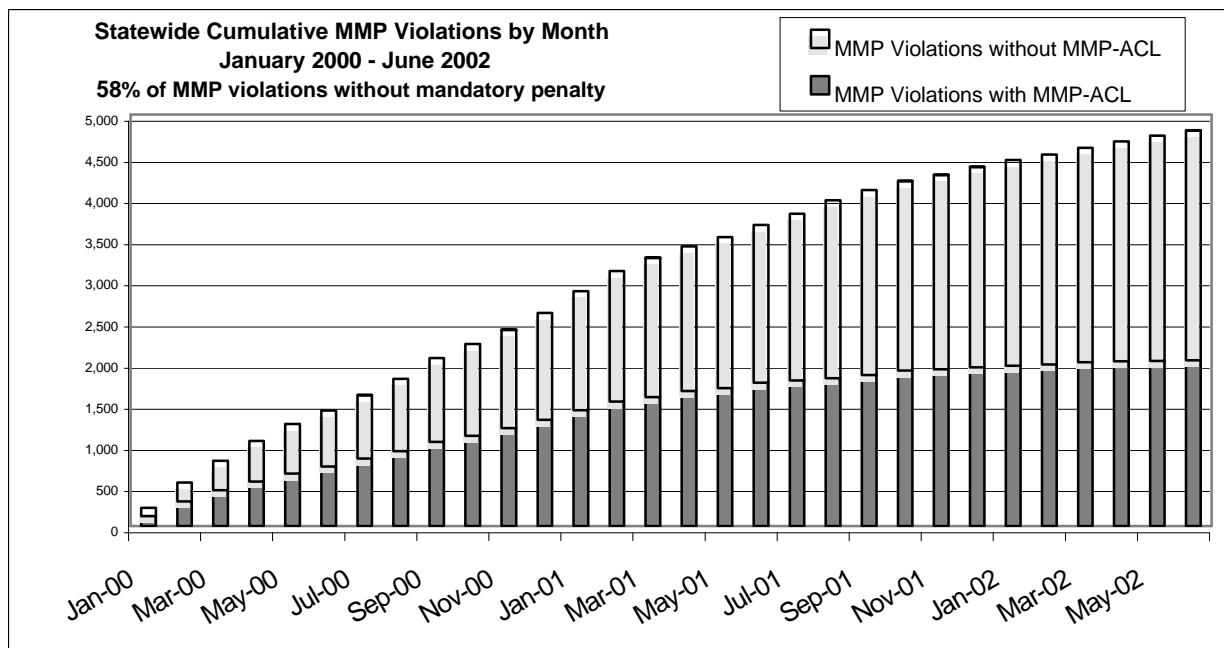
Discharger (Region)	Current overall compliance status	Previously anticipated compliance status after assessment of MMPs¹	Was significant compliance expected by Jan. 2002?¹	Has significant compliance been achieved?
Pismo Beach (3)	In addition to two previous MMPs this facility has accumulated \$522,000 in penalties from July 2001 to November 2002. The City of Pismo Beach is scheduled to break ground on a new WWTP in the Fall of 2003, with completion of the facility scheduled for Winter 2004/05. Violations are expected to continue until the new WWTP comes online.	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.	N/A	N/A	N/A
City of Coachella (7)	A Cease & Desist Order (CDO) has been proposed. Regional Board staff will be incorporating Coachella Sanitary District's Pollution Prevention Plan into the CDO. Coachella Sanitary District has applied for funding to construct a new POTW.	Minor increase in compliance	Yes	No
Centinella State Prison (7)	There has been a major increase in compliance. No violations have been noted in the last nine months.	Major increase in compliance	Yes	Yes
City of Corona (8)	Permit was modified so that the facility is no longer violating its effluent limitations. Facility is generally in compliance.	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.

3. Increasing backlog of violations that have not been issued MMPs.

The following bar graph shows the cumulative total number of violations that are subject to mandatory minimum penalties. The solid portion of each bar shows the cumulative number of penalties for which MMPs have been issued. The dotted portion of each bar shows the backlog of violations for which MMPs have not yet been issued. The reasons for this increasing backlog have been discussed previously in this report.

Figure 7: Violations subject to mandatory minimum penalties with and without penalties.



4. Additional effects of mandatory minimum penalties.

In some cases, mandatory minimum penalties have resulted in the easing of permit requirements at the time of permit renewal in order to reduce the permitte’s exposure to mandatory penalties. This easing of permit requirements may be done in the form of revised effluent limits or by reducing the frequency of sampling.

The Central Valley RWQCB has identified dischargers who have chosen to avoid mandatory minimum penalties by ceasing discharges to surface water. Discharges to land are not subject to mandatory minimum penalties.

(D) Recommendations for improvements to the 2003 enforcement program.

Implementation of the State Board Enforcement Policy

The enforcement policy includes both long-term and short-term objectives. Due to budgetary constraints, implementation of both will be delayed to various degrees.

Enforcement training is a high priority for the SWRCB and RWQCBs. As part of the SWRCB Training Initiative, comprehensive, customized enforcement training is planned in every RWQCB office during 2003.

Other short-term objectives that should remain a high priority include:

- developing tools to help staff identify priority violations;
- listing proposed supplemental environmental projects (SEPs). An SEP is a water quality improvement project that is funded through the administrative civil liability process as described in the Enforcement Policy;
- tracking funded SEPs;
- developing a standard format for documenting the basis of assessed liabilities; and
- improving violation and enforcement reporting.

Developing templates for permits and other enforceable orders is a long-term objective that is a high priority because it is expected to improve efficiency, increase consistency and enhance the enforceability of issued orders.

Compliance Report Card

The SWRCB is continuing efforts to compile and report reliable, up-to-date, targeted information about the number, character, distribution and effect of violations of requirements of the water quality programs administered by the Water Boards. The first Compliance Report Card is scheduled for early spring 2003. After review and validation, the information will be posted on the State Board's internet-site, www.swrcb.ca.gov. This should be considered a work-in-progress as the data system matures and the analytical tools develop.

Reducing The Backlog Of Mandatory Penalties

Several options should be considered for this objective:

- Redirection of RWQCB staff from other activities;
- Possible stream-lining of processes through the use of improved templates and batch processing; and
- Shift responsibility for the preparation of MMPs to the State Board.

Note: Recent legislation that allows a RWQCB to direct all or part of mandatory penalties to SEPs will significantly increase the staff time needed to assess MMPs and to track

implementation of approved projects. The backlog of MMPs is likely to increase due to these increased staff requirements.

Improved Data Systems

Improvement efforts to the SWIM database should continue regarding violation and enforcement information. The SWRCB should continue to explore and implement, as resources allow, electronic submittal of discharger monitoring reports with automatic compliance checking to identify reported violations. Such capability will significantly address current violation data entry lags, as well as accomplish significant other staff efficiencies.

State Water Resources Control Board

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Redding Branch Office
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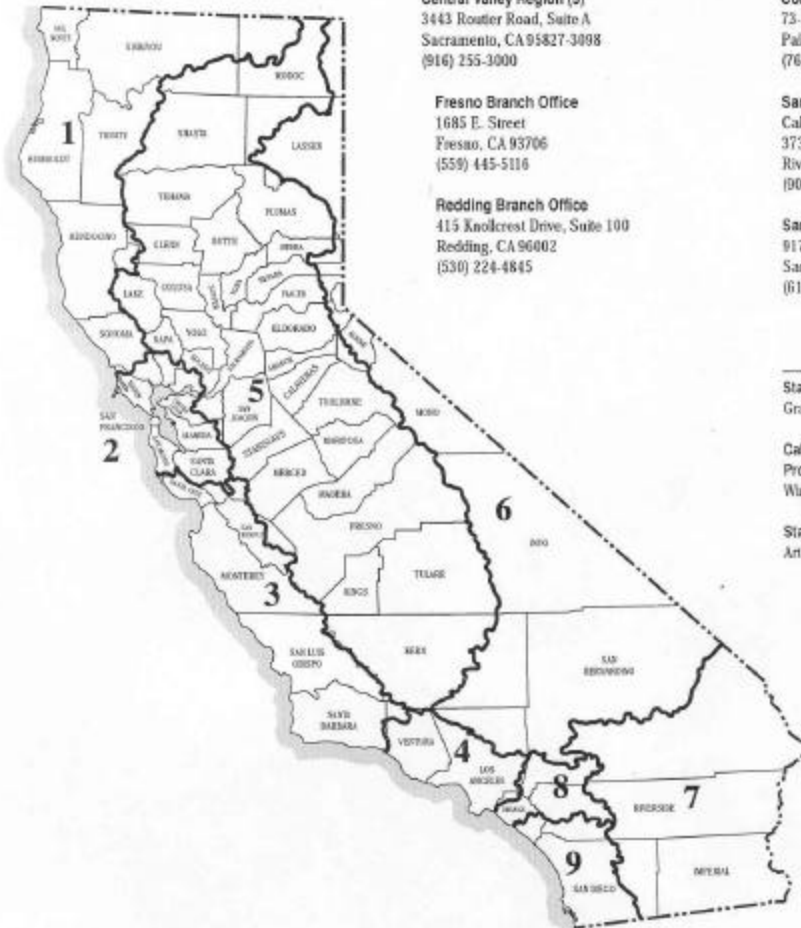
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 2501 Lake Tahoe Blvd.
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 Palm Desert, CA 92260
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 California Tower
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 Riverside, CA 92501-3339
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San Diego Region (9)
 9174 Skypark Ct., Ste. 100
 San Diego, CA 92124-1324
 (619) 467-2952



State of California
 Gray Davis, Governor

California Environmental
 Protection Agency
 Waston H. Hickox, Secretary

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

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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Oil and Grease																																													
Other detergents or algicides																																													
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 6-30-2002

Region	Agency	Facility	WDID	MMP Violations	Violations Receiving Penalty	Status of MMP for Facility
1	ARCATA, CITY OF	ARCATA CITY WWTF	1B82114OHUM	36	0	MMP Scheduled
1	EUREKA, CITY OF	EUREKA CITY ELK RIVER WWTP	1B82151OHUM	1	0	MMP Scheduled
1	FERNDALE, CITY OF	FERNDALE CITY POTW	1B83136OHUM	10	0	MMP Scheduled
1	FORT BRAGG, CITY OF	FORT BRAGG CITY WWTP	1B84083OMEN	62	0	MMP Scheduled
1	FORTUNA, CITY OF	FORTUNA CITY WWTP	1B83135OHUM	10	0	MMP Scheduled
1	GEORGIA PACIFIC CORPORATION	GP FORT BRAGG SAW	1B84089OMEN	14	0	MMP Scheduled
1	LOLETA CSD	LOLETA POTW	1B80081OHUM	33	0	MMP Scheduled
1	MCKINLEYVILLE CSD	MCKINLEYVILLE WWTP	1B82084OHUM	6	0	MMP Scheduled
1	MENDO CO WWD #2 ANCHOR BAY	MENDOCINO CWWD#2-ANCHOR BAY	1B83118OMEN	41	0	MMP Scheduled
1	REDWAY CSD	REDWAY POTW	1B83147OHUM	3	0	MMP Scheduled
1	SAMOA PACIFIC CELLULOSE. LLC	LP SAMOA PULPMILL	1B77005OHUM	21	12	
1	SANTA ROSA DEPT OF PUBLIC WORK	SANTA ROSA CITY WWTP, LAGUNA	1B83099OSON	23	17	
1	SONOMA COUNTY WATER AGENCY	SCWA RUSSIAN RIVER CSD	1B82045OSON	35	0	MMP Scheduled
1	SONOMA COUNTY WATER AGENCY	SCWA OCCIDENTAL CSD	1B83001OSON	78	69	MMP Scheduled
1	SONOMA COUNTY WATER AGENCY	SCWA FORESTVILLE CITY CSD	1B83100OSON	28	23	MMP Scheduled
1	SONOMA COUNTY WATER AGENCY	SCWA GRATON CSA NO. 2	1B84060OSON	14	8	MMP Scheduled
1	TULELAKE, CITY OF	TULELAKE CITY WWTP	1A84002OSIS	37	0	MMP Scheduled
Total Region 1				452	129	

2	APPLIED MATERIALS INC.	APPLIED MATERIALS.-B81 DEWATER	2 438146001	1	0	
2	BENICIA, CITY OF	BENICIA WWTP	2 482001001	16	10	
2	BURLINGAME, CITY OF	BURLINGAME WWTP	2 417005001	7	7	MMP Issued
2	C & H SUGAR	C & H SUGAR WWTP	2 071006001	12	9	MMP Scheduled
2	CALIF DEPT OF PARKS & RECR	ANGEL ISLAND STATE PK	2 215002001	10	10	MMP Issued
2	CALISTOGA, CITY OF	CALISTOGA WW TREATMENT PLANT	2 283003001	24	24	MMP Issued
2	CENTRAL MARIN SANITATION AG.	CENTRAL MARIN SAN AG.	2 215116001	10	8	
2	CHEVRON PRODUCTS CO	CHEVRON USA TERMINAL	2 438309001	1	0	
2	COAST OIL CO.	2075 ALUM ROCK, SJ, BULK PLANT	2 438448002	1	0	

2	DELTA DIABLO SANITATION DIST.	DELTA DIABLO SANT. DIS	2 071013001	7	7	MMP Issued
2	EAST BAY MUNICIPAL UTILITY DIS	ORINDA FILTER PLANT	2 071113001	4	1	MMP Issued
2	FAIRFIELD-SUISUN SEWER DISTRCT	SUBREGIONAL WWTP	2 482005001	31	6	MMP Issued
2	GENERAL ELECTRIC COMPANY	VALLECITOS NUCLEAR CENTER	2 019018001	6	6	MMP Issued
2	HANSON AGGREGATES	4501 TIDEWATER AVE, OAKLAND	2 019216001	20	0	
2	HANSON AGGREGATES	HANSON AGGREGATES	2 386028001	28	0	
2	HEWLETT PACKARD CO	HP-1501 PMR-BLDGS 1-6	2 438063003	2	1	
2	KOBE PRECISION INC	KOBE PRECISION INC	2 019328001	7	0	
2	LAS GALLINAS VALLEY S.D.	LAS GALLINAS WWTP	2 215012001	12	9	
2	LIVERMORE, CITY OF	LIVERMORE WPCP	2 019025001	4	4	MMP Issued
2	MALLINCKRODT, INC.	MANSION GROVE APARTMENTS	2 438517001	3	3	MMP Issued
2	MARTINEZ REFINING CO	NPD MAJ-FORMER SHELL REFINRY	2 071042001	2	1	
2	MISSION VALLEY ROCK COMPANY	MISSION VALLEY ROCK COMPAN	2 019321001	1	0	
2	MOUNTAIN VIEW, CITY OF	SMALL BOAT LAKE	2 438010001	1	0	
2	MT. VIEW SANITARY DIST	MT. VIEW SANITARY DIST	2 071029001	1	1	MMP Issued
2	NAPA SANITATION DISTRICT	NAPA SD WWTP	2 283009001	62	52	MMP Issued
2	NEC ELECTRONIC INC	NEC ELECTRONIC INC.	2 438162001	2	1	
2	NORTH SAN MATEO COUNTY SD	NORTH SAN MATEO WWTP	2 417021001	4	0	
2	NOVATO SANITARY DISTRICT	NOVATO AND IGNACIO STP	2 215022001	20	14	
2	PACIFIC GAS & ELECTRIC CO	HUNTERS POINT POWER PL	2 386003001	1	0	
2	PACIFICA, CITY OF	CALERA CRK WTR RECYCLING PLANT	2 417022002	70	9	
2	PACIFICA, CITY OF	PACIFICA WWTP	2 417022001	39	39	MMP Issued
2	PALO ALTO, CITY OF	PALO ALTO REGIONAL WQC PLANT	2 438011001	55	48	
2	PETALUMA, CITY OF	PETALUMA WPCP	2 494006001	27	26	
2	PINOLE, CITY OF	CITY OF PINOLE WWTP	2 071032001	10	8	MMP Scheduled
2	REYNOLD SCHWEICKHARDT	2790 HOMESTEAD, SC, L KENNEDY	2 438526002	1	1	MMP Issued
2	RICHMOND, CITY OF	RICHMOND WPCP	2 071037001	16	0	
2	RODEO SANITARY DISTRICT	RODEO SD STP	2 071039001	9	9	MMP Issued
2	SAN FRANCISCO, CITY & CO	BAYSIDE CSO	2 386010003	3	2	
2	SAN FRANCISCO, CITY & CO	SOUTHEAST PLANT	2 386010001	1	1	MMP Issued
2	SAN FRANCISCO, CITY AND CO	SF INT AIRPORT IND WTP	2 417033001	9	0	MMP Scheduled
2	SAN FRANCISCO, CITY AND CO	SF INT AIRPORT WQCP	2 417032001	10	10	MMP Issued
2	SAN JOSE SANTA CLARA WPCP	SAN JOSE SANTA CLARA WPCP	2 438014001	3	0	
2	SAN MATEO, CITY OF	SAN MATEO WQCP	2 417035001	18	0	MMP Scheduled
2	SANTA CLARA CO ROADS & AIRPORT	OREGON EXP UNDERPASS	2 438265001	2	2	MMP Issued

2	SAUSALITO-MARIN CITY SAN DIST	SAUSALITO STP	2 215023001	10	8	
2	SEWER AUTHORITY MID-COASTSIDE	MAJ-SAM WWTP	2 417068001	17	17	MMP Issued
2	SEWERAGE AGENCY OF SO. MARIN	SASM WWTP	2 215015001	2	2	MMP Issued
2	SONOMA VALLEY COUNTY S. D.	SONOMA VALLEY CNTY SD	2 494009001	49	30	MMP Scheduled
2	SOUTH BAYSIDE SYSTEM AUTHORITY	SBSA WWTP	2 417037001	4	0	
2	SOUTH SAN FRANCISCO STP	S SF SAN BRUNO WQCP	2 417038001	33	13	
2	SOUTHERN ENERGY CALIFORNIA	SEC PITTSBURG POWER PLANT	2 071030001	17	0	MMP Scheduled
2	SUNNYVALE, CITY OF	SUNNYVALE STP	2 438018001	4	4	MMP Issued
2	TOSCO REFINING COMPANY	TOSCO PORT COSTA PROJECT	2 071204002	4	2	
2	ULTRAMAR, INC.	ULTRAMAR GOLDEN EAGLE REFINERY	2 071048001	12	3	
2	USS-POSCO	USS-POSCO IND	2 071059001	26	14	MMP Issued
2	VALLEJO SAN AND FLOOD CONT DIS	VALLEJO SFGD WWTP	2 482012001	21	18	MMP Issued
2	WEST COUNTY AGENCY	COMBINED OUTFALL	2 071107001	15	11	MMP Scheduled
2	ZENECA INC, WESTERN RESEARCH	ZENECA, RICHMOND PLANT	2 071185001	2	2	MMP Issued
Total Region 2				789	453	

3	CA DEPT OF CORRECTIONS	CALIFORNIA MEN'S COLONY	3 400108001	61	24	No Action Planned
3	CA STATE PARKS	BIG BASIN WWTP	3 440800001	22	22	MMP Issued
3	CARMEL AREA WWD	CARMEL AREA WWTP	3 270101001	4	2	No Action Planned
3	CARPINTERIA SD	CARPINTERIA SD WWTP	3 420101001	3	2	
3	GOLETA SD	GOLETA SD WWTP	3 420102001	5	0	
3	HIGHLANDS SA	HIGHLANDS SA WWTP	3 270115001	47	0	MMP Scheduled
3	LOMPOC, CITY OF	LOMPOC REGIONAL WWTP	3 420105001	19	13	MMP Scheduled
3	MORRO BAY & CAYUCOS SD	MORRO BAY CAYUCOS WWTP	3 400103001	1	1	MMP Issued
3	NUNES COOLING, INC.	NUNES COOLING, INC.	3 272116001	1	0	No Action Planned
3	PISMO BEACH, CITY OF	PISMO BEACH WWTP	3 400106001	187	55	MMP Scheduled
3	RAGGED POINT INN	RAGGED POINT INN MOTEL	3 401001001	26	22	
3	RMC PACIFIC MATERIALS INC	RMC LONESTAR SANTA CRUZ CEMENT	3 442004003	4	0	MMP Scheduled
3	SAN LUIS OBISPO, CITY OF	SAN LUIS OBISPO WWTP	3 400107001	46	4	
3	SAN SIMEON CSD	SAN SIMEON WWTP	3 400110001	1	1	MMP Issued
3	SANTA BARBARA CITY PWD	EL ESTERO WWTP NPDES	3 420108001	2	0	
3	SANTA CRUZ CITY DPW	SANTA CRUZ WWTP	3 440102001	4	0	No Action Planned
3	SOUTH SAN LUIS OBISPO CO SD	SOUTH SAN LUIS OBISPO SD WWTP	3 400111001	2	0	MMP Scheduled
Total Region 3				435	146	

4	AES REDONDO BEACH, LLC	REDONDO GENERATING STATION	4B192111003	22	0	MMP Scheduled
4	AIR PRODUCTS & CHEMICALS, INC.	HYDROGEN PLANT & RELATED FAC.	4B191285001	2	2	MMP Issued
4	AIR PRODUCTS & CHEMICALS, INC.	CARSON HYDROGEN PLANT	4B196400054	3	3	MMP Issued
4	ALAMEDA CORRIDOR TRANS. AUTHOR	ALAMEDA MID-CORRIDOR TRENCH PJ	4B191340	62	0	MMP Scheduled
4	ANACAPA MARINE SERVICES	ANACAPA MARINE SERVICES	4A562442001	6	6	MMP Issued
4	ASHLAND CHEMICAL COMPANY	ASHLAND CHEMICAL COMPANY	4B196800001	1	1	MMP Issued
4	BP WILMINGTON CALCINER	BP WILMINGTON PLANT	4B192208003	2	2	MMP Issued
4	CALIFORNIA WATER SERVICE CO.	WELL # 29401	4B196000374	4	0	MMP Scheduled
4	CALIFORNIA WATER SERVICE CO.	WELL #'S 21501 & 21502	4B196000375	2	0	MMP Scheduled
4	CALLEGUAS MUNICIPAL WATER DIST	FAIRVIEW PUMP STATION	4A566000049	3	0	MMP Scheduled
4	CAMARILLO SANITARY DISTRICT	CAMARILLO WWRP	4A560100001	4	0	MMP Scheduled
4	CASDEN PROPERTIES, LLC	PARK LA BREA PARCEL "B"	4B196100062	2	2	MMP Issued
4	CEDARS-SINAI MEDICAL CENTER	CEDARS-SINAI MEDICAL CENTER	4B196000515	1	1	MMP Issued
4	COPPERFIELD INVESTMENT & DEVEL	WILSHIRE-HIGNLAND BLDG.	4B196000239	1	0	MMP Scheduled
4	CORNERSTONE SUBURBAN OFFICE,L	FIRST FINANCIAL PLAZA	4B196000399	4	4	MMP Issued
4	CSU, LONG BEACH	CSU, LONG BEACH, POOL, ETC	4B190800001	19	8	MMP Scheduled
4	EL SEGUNDO POWER, L.L.C.	EL SEGUNDO GENERATING STATION	4B192111001	22	0	MMP Scheduled
4	EQUITY OFFICE PROPERTIES	THE TOWER	4B196000360	1	1	MMP Issued
4	FAIRCHILD HOLDING CORP.	FAIRCHILD FASTENERS SCREWCORP	4B196800017	9	9	MMP Issued
4	FILLMORE, CITY OF	FILLMORE WWTP	4A560101002	39	0	MMP Scheduled
4	G & K MANAGEMENT CO., INC.	GRAND PROMENADE	4B196000135	1	1	MMP Issued
4	GEORGE & ERIKA KABOR FAMILY TR	LA CIENEGA CENTER	4B196100025	5	5	MMP Issued
4	GOLDEN WEST REFINING CO.	SANTA FE SPRINGS REFINERY	4B192162001	4	0	MMP Scheduled
4	GOODRICH CORPORATION	GOODRICH CORPORATION	4B196400039	10	10	MMP Issued
4	HARRIS WATER CONDITIONING	CULLIGAN WATER	4A561037001	3	3	MMP Issued
4	HERMETIC SEAL CORP.	HERMETIC SEAL CORP.	4B196400038	1	1	MMP Issued
4	HITCO CARBON COMPOSITES, INC.	HITCO DEFENSE PROD DIV,	4B192128001	8	8	MMP Issued
4	HPG MANAGEMENT	HANCOCK PARK PLACE APTS	4B196100005	1	1	MMP Issued
4	HPG MANAGEMENT	DETROIT APARTMENT, 360 S	4B196100006	1	1	MMP Issued
4	HR TEXTRON INC.	VALENCIA FACILITY	4A192332001	1	1	MMP Issued
4	KINDER MORGAN (FORMER GATX)	CARSON TERMINAL	4B192238002	12	12	MMP Issued
4	KINNELOA IRRIGATION DIST.	K3 WATER WELL	4B196000011	19	0	MMP Scheduled
4	LA CITY BUREAU OF SANITATION	TILLMAN WWRP	4B190106004	38	0	MMP Scheduled

4	LA CITY BUREAU OF SANITATION	MARINA INTERCEPTOR SEWER LINE	4B196000517	17	17	MMP Issued
4	LA CO DEPT OF PARKS&RECREATION	VAL VERDE CO. PARK SWIM POOL	4A190107086	7	7	MMP Issued
4	LA CO DEPT OF PUBLIC WORKS	STORM DRAIN PROJECT 9037	4B196000182	2	2	MMP Issued
4	LA CO DEPT OF PUBLIC WORKS	ALAMITOS BARRIER PROJECT 1,2&3	4B196000501	11	11	MMP Issued
4	LA CO MUSEUM OF NATURE SCIENCE	GEORGE C PAGE MUSEUM	4B196000333	2	2	MMP Issued
4	LA CO MUSEUM OF NATURE SCIENCE	GEORGE C PAGE MUSEUM	4B196100056	1	1	MMP Issued
4	LA CO SANITATION DISTRICTS	SAN JOSE CREEK WWRP	4B190107020	11	0	MMP Scheduled
4	LAKELWOOD, CITY OF	WELL # 14 PUMP TEST PROJ.	4B196000571	1	1	MMP Issued
4	LAS VIRGENES MWD	TAPIA WRF GROUNDWATER DISCH	4B196000037	4	4	MMP Issued
4	LAWRY'S RESTAURANTS, INC.	LAWRY'S PRIME RIB RESTAURAN	4B196000051	13	0	MMP Scheduled
4	LONG BEACH GENERATION LLC	LONG BEACH GENERATION STATION	4B192111002	3	0	MMP Scheduled
4	LOS ANGELES CITY OF DWP	TANK H, J AREA, HAYNES PLT. LB	4B190106042	1	1	MMP Issued
4	LOS ANGELES CITY OF DWP	TANK E AREA, HAYNES PLT, LB	4B190106049	4	4	MMP Issued
4	LOS ANGELES CITY OF DWP	TUNNEL # 105	4B190106099	1	0	MMP Scheduled
4	LOS ANGELES CITY OF DWP	HAYNES GENERATING STATION	4B193500002	29	0	MMP Scheduled
4	LOS ANGELES CITY OF DWP	HARBOR GENERATING STATION	4B193500004	40	0	MMP Scheduled
4	LOS ANGELES CITY OF DWP	LOS ANGELES HARBOR WRP	4B196100023	1	1	MMP Issued
4	LOS ANGELES MAISON	HOTEL SOFITEL LOS ANGELES	4B196800009	3	3	MMP Issued
4	M & H REALTY PARTNERS	VILLA MARINA MARKET PL	4B196000167	4	4	MMP Issued
4	MCA UNIVERSAL CITY STUDIOS	UNIVERSAL CITY STUDIOS	4B199017001	88	88	MMP Issued
4	NEWHALL LAND AND FARMING CO.	SOUTH RIVER DEWATERING PROJ.	4A196000467	20	0	MMP Scheduled
4	NEWLOWE PROPERTIES CO HMC	NEWLOWE PROPERTIES CO HMC	4B196800012	2	0	MMP Scheduled
4	PAKTANK CORP. - LOS ANGELES	WILMINGTON LIQ. BULK TERMINALS	4B199019002	1	1	MMP Issued
4	PASADENA, CITY OF	DEPT. OF WATER & POWER	4B190138001	3	3	MMP Issued
4	PNEUMO ABEX AEROSPACE, INC.	PNEUMO ABEX AEROSPACE CORP.	4A561058001	1	1	MMP Issued
4	PORT OF LONG BEACH	PIER A TOE DRAIN TREATMENT SYS	4B196800029	33	0	MMP Scheduled
4	PRAXAIR, INC.	PRAXAIR, WILMINGTON	4B192140001	8	8	MMP Issued
4	REDMAN EQUIPMENT & MFG CO	TORRANCE HEAT EXCHANGER MFG&RP	4B192090001	3	3	MMP Issued
4	REDONDO BEACH, CITY OF	SEASIDE LAGOON	4B190143001	17	17	MMP Issued
4	RELIANT ENERGY MANDALAY, LLC	ORMOND BEACH GENERATING STATIO	4A56201900	1	1	MMP Issued
4	RELIANT ENERGY MANDALAY, LLC	MANDALAY GENERATING STATION	4A562019001	1	1	MMP Issued
4	RMR PROPERTIES	RMR PROPERTIES	4B191086001	12	12	MMP Issued
4	RMR, INC.	SPINNAKER LIFT STATION PROJECT	4A566000541	7	0	MMP Scheduled
4	ROYAL CATERING	ROYAL CATERING, EL MONTE	4B191106001	30	30	MMP Issued
4	SANTA MONICA, CITY OF	SANTA MONICA WATER TRT. PLANT	4B190122001	1	1	MMP Issued

4	SANTA PAULA, CITY OF OMI	SANTA PAULA WWRP	4A560108001	6	0	MMP Scheduled
4	SHELL OIL PRODUCTS CO.	MORMON ISLAND MARINE TERMINAL	4B192108009	3	3	MMP Issued
4	SIMI VALLEY, CITY OF	SIMI VALLEY WWRP	4A560110001	1	0	MMP Scheduled
4	SIX FLAGS MAGIC MOUNTAIN	AMUSEMENT PARK, VALENCIA	4A199002002	11	11	MMP Issued
4	SONY PICTURES ENTERTAINMENT	THE CULVER STUDIOS	4B196100019	4	4	MMP Issued
4	SOUTHERN CALIFORNIA WATER CO.	YUKON NO. 5	4B196100068	7	7	MMP Issued
4	SPYGLASS HOMEOWNERS ASSOC.	SPYGLASS HOMEOWNERS ASSOC.	4B196000188	1	1	MMP Issued
4	THE BOEING COMPANY	C1 (LONG BEACH) FACILITY	4B196400063	5	5	MMP Issued
4	THE BOEING COMPANY	ROCKETDYNE DIV. - SANTA SUSANA	4B562013002	30	13	MMP Scheduled
4	THOUSAND OAKS CITY OF DPW	CITY OF THOUSAND OAKS	4A566000563	18	0	MMP Scheduled
4	TIDELANDS OIL PRODUCTION CO.	WILMINGTON AND TERMINAL ISLAND	4B192023001	1	0	MMP Scheduled
4	TOSCO CORP.	LOS ANGELES TERMINAL WEST	4B192131013	2	0	MMP Scheduled
4	TRW INC.	SPACE PARK FACILITY	4B192557003	3	3	MMP Issued
4	TUTOR-SALIBA TEAM	MID-CORRIDOR PIPELINE RELOCATI	4B196100037	5	5	MMP Issued
4	UNIVERSITY OF CALIFORNIA LA	UNIVERSITY OF CALIFORNIA LA	4B196000532	2	2	MMP Issued
4	UNOCAL CORP.	UNOCAL SS #5894	4B196600110	1	1	MMP Issued
4	WB LTD	12100 WILSHIRE BLVD	4B196000297	2	2	MMP Issued
				Total Region 4	798	363

5F	ATWATER, CITY OF	WWTF	5C240100001	26	12	MMP Scheduled
5F	CALIFORNIA DAIRIES, INC	TIPTON MILK & BUTTER PROC FAC	5D541067001	9	0	MMP Scheduled
5F	GRIFFIN RESOURCES	MOUNT POSO, POSCAL PAC VILLARD	5D152028001	1	0	MMP Scheduled
5F	KAWEAH RIVER ROCK CO, INC	SAND AND GRAVEL PLANT	5D541046001	1	0	
5F	MALAGA CWD	WWTF	5D100124001	8	0	MMP Scheduled
5F	MERCED, CITY OF	WWTF	5C240108001	16	4	MMP Scheduled
5F	PLANADA CSD	WWTF	5C240110001	43	0	MMP Scheduled
5F	PLIANT CORPORATION	VITAFILM PLANT	5C242008001	9	0	No Action Planned
5F	SOUTHERN CALIF EDISON CO	BIG CREEK POWERHOUSE NO 1	5C102009001	8	0	MMP Scheduled
				Total Region 5 Fresno	121	16

5S	BRENTWOOD, CITY OF	BRENTWOOD WWTP	5B070101001	87	81	MMP Issued
5S	CA DEPT OF CORRECTIONS-JAMESTO	SIERRA CONSERVATION CTR-WTP	5C550801002	32	32	MMP Issued
5S	CA DEPT OF FISH & GAME	NIMBUS HATCHERY	5A340801001	7	7	MMP Issued
5S	CA DEPT OF GENERAL SERVICES	CENTRAL HEATING COOLING FAC	5A340802001	14	0	MMP Scheduled
5S	CA DEPT OF GENERAL SERVICES	STATE PRINTING & WAREHOUSES	5A340805001	4	0	MMP Scheduled
5S	COLFAX, CITY OF	COLFAX STP	5A310101001	27	0	MMP Scheduled
5S	COLUSA, CITY OF	COLUSA WWTP	5A060101001	12	0	MMP Scheduled
5S	CON AGRA GROCERY PRODUCTS CO	OAKDALE FACILITY	5C502023001	59	59	MMP Issued
5S	DEUEL VOCATIONAL INSTITUTE	DEUEL VOCATNL INST. STP	5B390100001	231	0	MMP Scheduled
5S	DISCOVERY BAY CSD	DISCOVERY BAY TRMT PLANT	5B070105003	43	39	MMP Scheduled
5S	EAST BAY MUD	CAMANCHE DAM POWER HOUSE	5B390114001	1	1	MMP Issued
5S	EL DORADO ID	HYDRO ELECTRIC PROJ (FERC 184)	5A09NP00004	27	0	MMP Scheduled
5S	GALT, CITY OF	GALT SD	5B340101001	4	0	MMP Scheduled
5S	GAYLORD CONTAINER CORPORATION	ANTIOCH PULP & PAPER MILL	5B072039001	2	2	MMP Issued
5S	GRASS VALLEY, CITY OF	GRASS VALLEY, CITY OF STP	5A290100001	78	0	MMP Scheduled
5S	GWF POWER SYSTEMS, L.P.	GWF POWER SYSTEMS, SITE IV	5B072050003	1	1	MMP Issued
5S	HUNT-WESSON, INC.	HUNT-WESSON, INC.	5A572002001	6	6	MMP Issued
5S	LINDA CO WATER DISTRICT	LINDA CO WTR DIST WPCP	5A580100002	1	0	MMP Scheduled
5S	LIVE OAK, CITY OF	CITY OF LIVE OAK WWTP	5A510100001	8	0	MMP Scheduled
5S	LODI, CITY OF	WHITE SLOUGH WATER POLL CON PU	5B390103002	6	2	MMP Scheduled
5S	MANTECA, CITY OF	MANTECA WW QUALITY CONTROL FAC	5B390104001	91	0	MMP Scheduled
5S	MODESTO ID	MODESTO ID REGIONAL WTP	5C500114003	1	0	MMP Scheduled
5S	NEVADA CO SD #1	CASCADE SHORES WWTP	5A290107002	21	0	MMP Scheduled
5S	PLACER CO FACILITY SERVICES 1	PLACER CO SMD NO 1	5A310104007	6	5	MMP Scheduled
5S	PLACER CO FACILITY SERVICES 1	SA NO 28, ZONE NO.6	5A310104011	17	0	MMP Scheduled
5S	PLACERVILLE, CITY OF	HANGTOWN CREEK WWTP	5A090100001	3	3	MMP Issued
5S	PROCTER AND GAMBLE COMPANY	PROCTER & GAMBLE CO WWTP	5A342004001	3	0	MMP Scheduled
5S	RIO VISTA, CITY OF	RIO VISTA WASTE TRT FACILITY	5A480104001	17	14	MMP Scheduled
5S	RIO VISTA, CITY OF	TRILOGY WWTP	5A480108001	2	1	MMP Scheduled
5S	ROSEVILLE, CITY OF	DRY CREEK WWTP	5A310106001	3	3	MMP Issued
5S	SACRAMENTO CO DPW-GOETHE RD	KIEFER LANDFILL GW TREATMENT	5A340311002	1	1	MMP Issued
5S	SACRAMENTO COGENERATION AUTH	SACRAMENTO COGEN AUTH PROJECT	5A3420410	1	0	MMP Scheduled
5S	SACRAMENTO REGIONAL CSD-SACTO	SACRAMENTO REGIONAL WWTP	5A340108002	7	0	MMP Scheduled
5S	SEVEN CROWN RESORTS, INC.	PARADISE POINT MARINA	5B391041001	5	0	MMP Scheduled

5S	TEICHERT AGGREGATES	SETTLING POND DISCHARGE	5A347001001	7	6	MMP Scheduled
5S	TRACY, CITY OF	TRACY SEWAGE TRT. PLANT	5B390108001	4	0	MMP Scheduled
5S	TURLOCK, CITY OF	TURLOCK WWTP	5C500108001	12	0	MMP Scheduled
5S	UC DAVIS	UC DAVIS MAIN STP	5A570800001	6	5	MMP Scheduled
5S	VACAVILLE, CITY OF	EASTERLY SEWAGE TRT PLANT	5A480105002	24	15	MMP Scheduled
5S	WEST SACRAMENTO, CITY OF	WEST SACRAMENTO STP	5B570103001	4	2	MMP Scheduled
5S	WILLIAMS, CITY OF	WILLIAMS WWTP	5A060103001	3	0	MMP Scheduled
5S	WILLOWS, CITY OF	WILLOWS WWTP	5A110101001	8	0	MMP Scheduled
				Total Region 5 Sacramento	896	285

5R	ALTURAS, CITY OF	ALTURAS MUNICIPAL WWTP	5A250100001	1	0	MMP Scheduled
5R	ANDERSON, CITY OF	ANDERSON WPCP	5A450100001	1	1	MMP Issued
5R	BIGGS, CITY OF	BIGGS WWTP	5A040100001	39	0	MMP Scheduled
5R	CHICO, CITY OF	CHICO REGIONAL WWTF	5A040102001	5	5	MMP Issued
5R	COLLINS PINE COMPANY	CHESTER SAWMILL	5A322000001	2	2	MMP Issued
5R	HOLLY TREE RANCH DEVELOPMENT	GREENHORN MINE	5A459010001	3	0	No Action Planned
5R	LEHIGH SOUTHWEST CEMENT CO	LEHIGH SOUTHWEST CEMENT CO	5A452008001	2	0	MMP Scheduled
5R	QUINCY CSD	QUINCY WWTP	5A320103001	3	0	MMP Scheduled
5R	REDDING, CITY OF	CLEAR CREEK WWTP	5A450103001	2	1	MMP Scheduled
				Total Region 5 Redding	58	9

6	None			0	0	
				Total Region 6	0	0

7	BRAWLEY, CITY OF	BRAWLEY WWTP-NPDES 00-087	7A130100011	24	15	MMP Scheduled
7	CA DEPT OF CORRECTIONS	CENTINELA STATE PRISON 98-014	7A131337001	17	16	No Action Planned
7	CALIPATRIA, CITY OF	CALIPATRIA - NPDES 00-002	7A130102041	20	0	MMP Scheduled
7	COACHELLA SANITARY DISTRICT	COACHELLA SD - NPDES 00-032	7A330104012	99	77	MMP Scheduled
7	IMPERIAL COMMUN. COLLEGE DIST	IMP COMM COLLEGE WTP 99-009	7A130113011	4	3	No Action Planned
7	IMPERIAL, CITY OF	IMPERIAL WPCP 00-040	7A130106011	8	4	MMP Scheduled

7	NILAND SANITARY DISTRICT	NILAND STP 98-017	7A130109011	7	0	MMP Scheduled
7	SEELEY COUNTY WATER DISTRICT	SEELEY CWD WWTP 02-126	7A130111013	13	4	MMP Scheduled
7	VALLEY SANITARY DISTRICT	VALLEY SD STP - NPDES 00-010	7A330122021	2	2	MMP Issued
7	WESTMORLAND, CITY OF	WESTMORLAND WWTP 02-004	7A130112012	7	0	MMP Scheduled
			Total Region 7	201	121	

8	AES HUNTINGTON BEACH, L.L.C.	GENERATING STATION,HUNT BEACH	8 302015004	1	0	
8	ARIZONA PIPELINE CO.	DEWATERING,BALBOA ISLAND	8 303314001	1	0	
8	BEAUMONT, CITY OF	STP NO. 1	8 330101001	1	0	MMP Scheduled
8	BELL INDUSTRIES	GW CLEANUP-S.A.,RITCHEY	8 303189001	1	0	
8	CALIFORNIA STEEL INDUSTRIES	STORM,MULBERRY DITCH & SAN SEV	8 362023002	11	7	MMP Scheduled
8	CALTRANS - DISTRICT 12	DEWATERING,GENERAL-ORANGE CO.	8 302691001	18	0	
8	COLTON/SAN BERNARDINO RTT&WA	STP,RIX	8 362375001	81	78	MMP Issued
8	CORONA, CITY OF	STP NO. 1	8 330108001	105	98	MMP Issued
8	GARDEN GROVE, CITY OF	DEWATERING,GENERAL	8 302689001	4	4	MMP Issued
8	GLEN IVY HOT SPRINGS	HOT SPRINGS,GLEN IVY	8 331050001	8	0	
8	INLAND EMPIRE UTILITIES AGENCY	STP NO 2,CHINO	8 360104001	6	4	MMP Issued
8	INLAND EMPIRE UTILITIES AGENCY	STP NO 1,ONTARIO-UPLAND	8 360104004	9	6	MMP Issued
8	INLAND EMPIRE UTILITIES AGENCY	STP,CARBON CANYON	8 362283001	1	1	MMP Issued
8	IRVINE COMPANY	DEWATERING,GENERAL	8 302448001	3	0	
8	IRVINE RANCH WATER DISTRICT	DEWATERING,GENERAL	8 302006009	5	0	
8	MESA CONSOLIDATED WATER DIST	DEWATERING,GENERAL-COSTA MESA	8 302439001	2	0	
8	MOUNTAINVIEW POWER CO., LLC	GENERATING STATION,SAN BERDO	8 362036003	6	6	MMP Issued
8	MWD OF SOUTHERN CALIFORNIA	WTP,DIEMER	8 300137001	3	0	
8	ORANGE CO. PF&RD	DEWATERING,GENERAL	8 300124001	12	0	
8	RIALTO, CITY OF	STP	8 360112001	53	53	MMP Scheduled
8	WESTERN RIVERSIDE CO. RWA	STP,NORCO	8 332353001	95	88	MMP Issued
8	YUCAIPA VALLEY WATER DISTRICT	STP	8 362222001	191	181	MMP Issued
			Total Region 8	617	526	

9	AMERICAN PLAZA OWNERS ASSOC	ONE AMERICAN PLAZA DEWATER	9 000000469	8	8	MMP Issued
9	ATLANTIC RICHFIELD CO.	ARCO 03012	9 000000941	11	8	MMP Scheduled
9	BEUS, LEO RAY CO JNE ASSOC	CORONADO RESIDENCE DEWAT	9 000000947	4	0	MMP Scheduled
9	CONOCOPHILLIPS COMPANY	76 STATION 5965 SAN MARCOS VIL	9 000000920	6	6	No Action Planned
9	CONTINENTAL MARITIME IND, INC	CONTINENTAL MARITIME SHIPYARD	9 000000400	8	8	No Action Planned

9	CORONADO, CITY OF	GLORIETTA BAY PUMP STATION DW	9 000000938	16	13	MMP Scheduled
9	ESCONDIDO, CITY OF	HALE AVE RESOURCE RECOVERY FAC	9 000000031	6	3	MMP Scheduled
9	FALLBROOK PUBLIC UTILITY DIST	PLANT NO 1, OCEANSIDE OUTFALL	9 000000115	31	31	MMP Issued
9	KINDER MORGAN, MVT, SFPP, L.P.	MISSION VALLEY TERMINAL	9 000000506	9	9	MMP Issued
9	MANCHESTER RESORTS	HYATT HOTEL EXPANSION DEWATER	9 000000951	11	11	MMP Issued
9	MISSION LINEN ENGINEERING	MISSION LINEN SUPPLY	9 000000020	2	2	MMP Issued
9	NATIONAL STEEL & SHIPBUILDING	NASSCO	9 000000066	21	21	MMP Issued
9	NEVADA INVESTMENT HOLDINGS, INC	SUNBELT REMEDTN 1702 O'SIDE BL	9 000000817	4	4	MMP Issued
9	NEW URBAN WEST, INC	BROOKSIDE CONSTRUCTION DEWAT	9 000000925	26	26	MMP Scheduled
9	OCEANSIDE, CITY OF, WTR UTIL DEP	SAN LUIS REY WWTP, OCEANSIDE	9 000000146	5	4	MMP Scheduled
9	PROMENADE MALL DEVELOPMT CORP	PROMENADE AT PACIFIC BCH DEWAT	9 00000005	21	12	MMP Scheduled
9	RANCHO CA WD	PRODUCTION WELL #205 DEWATER	9 000000907	4	0	MMP Scheduled
9	RANCHO CA WD	RCWD WATR PROD WELL#121 DEWATR	9 000000807	1	1	MMP Issued
9	RANCHO CA WD	SANTA ROSA WRF	9 000000601	28	28	MMP Issued
9	SAN DIEGO, CITY OF	SAN DIEGO CONVENTION CTR DEWAT	9 000000329	41	23	MMP Scheduled
9	SAN DIEGO, CITY OF, MWWD	SOUTH BAY WATER RECLAM PLANT	9 000000900	7	0	Facility Exempt - CDO or TSO
9	SAN ELIJO JOINT POWERS AUTH	SAN ELIJO WPCF	9 000000125	5	2	MMP Scheduled
9	SEA WORLD, INC	SEA WORLD, SAN DIEGO	9 000000083	7	5	MMP Scheduled
9	SOCWA	SOCWA SAN JUAN CREEK OCEAN OF	9 000000175	2	0	MMP Scheduled
9	SOUTHERN CALIFORNIA EDISON	SONGS UNIT 1	9 000000086	3	3	MMP Issued
9	SOUTHLAND CORP	7-11 STORE #20342 REMED	9 000000795	1	0	MMP Scheduled
9	SOUTHLAND CORP	7-11 STORE 20611	9 000000904	6	5	MMP Scheduled
9	SOUTHLAND CORP	7-11 STORE 22894 REMED	9 000000910	7	3	MMP Scheduled
9	SOUTHWEST MARINE, INC	SOUTHWEST MARINE SHIPYARD	9 000000137	1	0	No Action Planned
				Total Region 9	302	236

GRAND TOTAL: 4,669 2,284
% OF NONEXEMPT VIOLATIONS W/ MMP: 49%
TOTAL # OF FACILITIES: 298
OF FACILITIES W/ ENFORCEMENT ACTION: 180
% OF FACILITIES W/ ENFORCEMENT ACTION: 60%
VIOLATIONS FOR EXEMPT FACILITIES (CDO OR TSO): 7