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VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED

June 4, 2010

James Ratto, President
James Salyers, Vice-President
Rick Holiday, Operations Manager
West Sonoma County Disposal Service, Inc.
3417 Standish Avenue
Santa Rosa, CA 95407

James Ratto, President
James Salyers, Vice-President
Rick Holiday, Operations Manager
West Sonoma County Disposal Service, Inc.
P.O. Box 1916
Santa Rosa, CA 95402

**Re: Notice of Violations and Intent to File Suit Under the Federal Water
Pollution Control Act (Clean Water Act)**

Dear Mssrs. Ratto, Salyers, and Holiday:

I am writing on behalf of the California Sportfishing Protection Alliance (“CSPA”) and the Petaluma River Council (“PRC”) regarding violations of the Clean Water Act (“Act”) that CSPA and PRC believe are occurring at West Sonoma County Disposal Service, Inc., located at 3417 Standish Avenue in Santa Rosa, California (“Facility”). CSPA is a non-profit public benefit corporation dedicated to the preservation, protection, and defense of the environment, wildlife, and natural resources of the Russian River, Laguna de Santa Rosa, and other California waters. PRC is an unincorporated organization of concerned citizens, residing in and around Petaluma, committed to protecting and improving the health and character of the Petaluma River, the Russian River, the Laguna de Santa Rosa, and other California waters and their surrounding environment. This letter is being sent to you as the responsible owners, officers, or operators of the Facility (all recipients are hereinafter collectively referred to as “WSCD”).

This letter addresses WSCD’s unlawful discharge of pollutants from the Facility into channels that flow into the Sonoma County Storm Drain System, which empties into Todd Creek, Todd Creek then joins the Laguna de Santa Rosa, which in turn flows into the Russian River, which drains into the Pacific Ocean. The Facility is discharging storm water pursuant to National Pollutant Discharge Elimination System (“NPDES”) Permit No. CA S000001, State Water Resources Control Board (“State Board”) Order No. 92-12-DWQ as amended by Order No. 97-03-DWQ (hereinafter “General Permit”). The Waste Discharge Identification Number (“WDID”) for the Facility listed on documents submitted to the State Board is 149I012696. The

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Facility is engaged in ongoing violations of the substantive and procedural requirements of the General Permit.

Section 505(b) of the Clean Water Act requires a citizen to give notice of intent to file suit sixty (60) days prior to the initiation of a civil action under Section 505(a) of the Act (33 U.S.C. § 1365(a)). Notice must be given to the alleged violator, the U.S. Environmental Protection Agency (“EPA”), and the State in which the violations occur.

As required by the Clean Water Act, this Notice of Violations and Intent to File Suit provides notice of the violations that have occurred, and continue to occur, at the Facility. Consequently, CSPA and PRC hereby place WSCD on formal notice that, after the expiration of sixty days from the date of this Notice of Violation and Intent to Sue, CSPA and PRC intend to file suit in federal court against West Sonoma County Disposal, Inc.; James Ratto; James Salyers; Rick Holiday; plus any other responsible managers, directors, or operators, under Section 505(a) of the Clean Water Act (33 U.S.C. § 1365(a)) for violations of the Clean Water Act and the General Permit. These violations are described more extensively below.

I. Background.

On November 19, 1996, WSCD filed its Notice of Intent to Comply with the Terms of the General Permit to Discharge Storm Water Associated with Industrial Activity (“NOI”). WSCD certified that the Facility is classified under SIC code 5093 (“Processing, Reclaiming, and Wholesale Distribution of Scrap and Waste Materials”) and 5015 (“Motor Vehicle Parts, Used”). The Facility collects and discharges storm water from its approximately seven-and-a-half (7½) acre industrial site through at least three outfalls that flow into the Sonoma County Storm Drain System, which empties into Todd Creek, which then joins the Laguna de Santa Rosa, which in turn flows into the Russian River, which drains into the Pacific Ocean.

The California Regional Water Quality Control Board, North Coast Region (“Regional Board”) has identified beneficial uses of the North Coast region’s waters and established water quality standards for the region in the “Water Quality Control Plan for the North Coast Region,” generally referred to as the Basin Plan. See http://www.waterboards.ca.gov/northcoast/water_issues/programs/basin_plan/basin_plan.shtml. The beneficial uses of these waters include, among others, contact and non-contact recreation, fish migration, endangered and threatened species habitat, shellfish harvesting, and fish spawning. Basin Plan at 2-1.00 – 2-18.00. The non-contact recreation use is defined as “[u]ses of water for recreational activities involving proximity to water, but not normally involving body contact with water, where ingestion of water is reasonably possible. These uses include, but are not limited to, picnicking, sunbathing, hiking, beachcombing, camping, boating, tidepool and marine life study, hunting, sightseeing, or aesthetic enjoyment in conjunction with the above activities.” *Id.* at 2-2.00. Visible pollution, including visible sheens and cloudy or muddy water from industrial areas, impairs people’s use of the Laguna de Santa Rosa, Russian River, and their tributaries for contact and non-contact water recreation.

The Basin Plan establishes numeric water quality objectives for specified pollutants for all inland surface waters of the region, including the Russian River and the Laguna de Santa Rosa. Basin Plan at 3-3.00, 3-9.00. The Basin Plan establishes a water quality objective for aluminum of 1.0 mg/L. *Id.* at 3-9.00. Likewise, the Basin Plan establishes a water quality objective for lead of 0.05 mg/L. *Id.* The EPA has adopted freshwater numeric water quality standards for zinc of 0.12 mg/L (Criteria Maximum Concentration – (“CMC”) and Criteria Continuous Concentration – (“CCC”)); for copper of 0.013 mg/L (CMC) and 0.009 mg/L (CCC); and for lead of 0.065 mg/L (CMC) and 0.0025 mg/L (CCC). 65 Fed.Reg. 31712 (May 18, 2000).

The Basin Plan includes a narrative toxicity standard which states that “[a]ll waters shall be maintained free of toxic substances in concentrations that are toxic to, or that produce detrimental physiological responses in human, plant, animal, or aquatic life.” Basin Plan at 3-4.00. The Basin Plan includes a narrative oil and grease standard which states that “[w]aters shall not contain oils, greases, waxes, or other materials in concentrations that result in a visible film or coating on the surface of the water or on objects in the water, that cause nuisance, or that otherwise adversely affect beneficial uses.” *Id.* The Basin Plan provides that “[w]aters shall not contain suspended material in concentrations that cause nuisance or adversely affect beneficial uses.” *Id.* The Basin Plan provides that “[t]he suspended sediment load and suspended sediment discharge rate of surface waters shall not be altered in such a manner as to cause nuisance or adversely affect beneficial uses.” *Id.* at 3-3.00. The Basin Plan establishes a pH standard for the Laguna de Santa Rose of not less than 6.5 and not more than 8.5. *Id.* at 3-8.00.

The EPA has published benchmark levels as guidelines for determining whether a facility discharging industrial storm water has implemented the requisite best available technology economically achievable (“BAT”) and best conventional pollutant control technology (“BCT”). 65 Fed. Reg. 64767 (October 30, 2000). The following benchmarks have been established for pollutants discharged by WSCD: pH – 6.0-9.0 units; total suspended solids (“TSS”) – 100 mg/L; oil and grease (“O&G”) – 15 mg/L; aluminum – 0.75 mg/L; copper – 0.0636 mg/L; iron – 1.0 mg/L; lead – 0.0816 mg/L; zinc – 0.117 mg/L; and chemical oxygen demand (“COD”) – 120 mg/L. The State Water Quality Control Board also has proposed adding a benchmark level to the General Permit for specific conductance of 200 µmho/cm.

II. Alleged Violations of the NPDES Permit.

A. Discharges in Violation of the Permit.

WSCD has violated and continues to violate the terms and conditions of the General Industrial Storm Water Permit. Section 402(p) of the Act prohibits the discharge of storm water associated with industrial activities, except as permitted under an NPDES permit (33 U.S.C. § 1342) such as the General Permit. The General Permit prohibits any discharges of storm water associated with industrial activities or authorized non-storm water discharges that have not been

subjected to BAT or BCT. Effluent Limitation B(3) of the General Permit requires dischargers to reduce or prevent pollutants in their storm water discharges through implementation of BAT for toxic and nonconventional pollutants and BCT for conventional pollutants. BAT and BCT include both nonstructural and structural measures. General Permit, Section A(8). Conventional pollutants are TSS, O&G, pH, biochemical oxygen demand (“BOD”), and fecal coliform. 40 C.F.R. § 401.16. All other pollutants are either toxic or nonconventional. *Id.*; 40 C.F.R. § 401.15.

In addition, Discharge Prohibition A(1) of the General Permit prohibits the discharge of materials other than storm water (defined as non-storm water discharges) that discharge either directly or indirectly to waters of the United States. Discharge Prohibition A(2) of the General Permit prohibits storm water discharges and authorized non-storm water discharges that cause or threaten to cause pollution, contamination, or nuisance.

Receiving Water Limitation C(1) of the General Industrial Storm Water Permit prohibits storm water discharges and authorized non-storm water discharges to surface or groundwater that adversely impact human health or the environment. Receiving Water Limitation C(2) of the General Permit also prohibits storm water discharges and authorized non-storm water discharges that cause or contribute to an exceedance of any applicable water quality standards contained in a Statewide Water Quality Control Plan or the applicable Regional Board’s Basin Plan. The General Permit does not authorize the application of any mixing zones for complying with Receiving Water Limitation C(2). As a result, compliance with this provision is measured at the Facility’s discharge monitoring locations.

WSCD has discharged and continues to discharge storm water with unacceptable levels of TSS, specific conductivity, oil and grease, aluminum, copper, iron, lead, zinc, COD, and possibly other pollutants in violation of the General Permit. WSCD’s sampling and analysis results reported to the Regional Board confirm discharges of specific pollutants and materials other than storm water in violation of the Permit provisions listed above. Self-monitoring reports under the Permit are deemed “conclusive evidence of an exceedance of a permit limitation.” *Sierra Club v. Union Oil*, 813 F.2d 1480, 1493 (9th Cir. 1988).

The following discharges of pollutants from the Facility have contained concentrations of pollutants in excess of narrative and numeric water quality standards established in the Basin Plan or promulgated by EPA and thus violated Discharge Prohibitions A(1) and A(2) and Receiving Water Limitations C(1) and C(2) and are evidence of ongoing violations of Effluent Limitation B(3) of the General Industrial Storm Water Permit:

Date	Parameter	Observed Concentration	Basin Plan or EPA Water Quality Objective	Location (as identified by the Facility)
1/25/2010	Aluminum	27 mg/L	1.0 mg/L	SD1
1/25/2010	Aluminum	16 mg/L	1.0 mg/L	SD4

Date	Parameter	Observed Concentration	Basin Plan or EPA Water Quality Objective	Location (as identified by the Facility)
1/25/2010	Aluminum	32 mg/L	1.0 mg/L	SD5
1/25/2010	Lead	0.077 mg/L	0.05 mg/L	SD5
1/25/2010	Lead	0.077 mg/L	0.065 mg/L (CMC)	SD5
1/25/2010	Lead	0.077 mg/L	0.0025 mg/L (CCC)	SD5
1/25/2010	Zinc	0.29 mg/L	0.12 mg/L (CMC & CCC)	SD1
1/25/2010	Zinc	0.39 mg/L	0.12 mg/L (CMC & CCC)	SD4
1/25/2010	Zinc	1.4 mg/L	0.12 mg/L (CMC & CCC)	SD5
1/21/2010	Aluminum	24 mg/L	1.0 mg/L	SD1
1/21/2010	Aluminum	9.7 mg/L	1.0 mg/L	SD4
1/21/2010	Aluminum	16 mg/L	1.0 mg/L	SD5
1/21/2010	Copper	0.1 mg/L	0.013 mg/L (CMC)	SD1
1/21/2010	Copper	0.1 mg/L	0.009 mg/L (CCC)	SD1
1/21/2010	Lead	0.078 mg/L	0.05 mg/L	SD1
1/21/2010	Lead	0.078 mg/L	0.065 mg/L (CMC)	SD1
1/21/2010	Lead	0.078 mg/L	0.0025 mg/L (CCC)	SD1
1/21/2010	Zinc	0.77 mg/L	0.12 mg/L (CMC & CCC)	SD1
1/21/2010	Zinc	0.41 mg/L	0.12 mg/L (CMC & CCC)	SD4
1/21/2010	Zinc	0.37 mg/L	0.12 mg/L (CMC & CCC)	SD5
1/18/2010	Aluminum	21 mg/L	1.0 mg/L	SD1
1/18/2010	Aluminum	30 mg/L	1.0 mg/L	SD4
1/18/2010	Aluminum	14 mg/L	1.0 mg/L	SD5
1/18/2010	Copper	0.12 mg/L	0.013 mg/L (CMC)	SD4
1/18/2010	Copper	0.12 mg/L	0.009 mg/L (CCC)	SD4
1/18/2010	Lead	0.14 mg/L	0.05 mg/L	SD1
1/18/2010	Lead	0.14 mg/L	0.065 mg/L (CMC)	SD1
1/18/2010	Lead	0.14 mg/L	0.0025 mg/L (CCC)	SD1
1/18/2010	Lead	0.24 mg/L	0.05 mg/L	SD4
1/18/2010	Lead	0.24 mg/L	0.065 mg/L (CMC)	SD4
1/18/2010	Lead	0.24 mg/L	0.0025 mg/L (CCC)	SD4
1/18/2010	Lead	0.07 mg/L	0.05 mg/L	SD5
1/18/2010	Lead	0.07 mg/L	0.065 mg/L (CMC)	SD5
1/18/2010	Lead	0.07 mg/L	0.0025 mg/L (CCC)	SD5
1/18/2010	Zinc	0.69 mg/L	0.12 mg/L (CMC & CCC)	SD1
1/18/2010	Zinc	2.6 mg/L	0.12 mg/L (CMC & CCC)	SD4
1/18/2010	Zinc	0.38 mg/L	0.12 mg/L (CMC & CCC)	SD5
11/20/2009	Aluminum	18 mg/L	1.0 mg/L	SD1
11/20/2009	Aluminum	31 mg/L	1.0 mg/L	SD4
11/20/2009	Aluminum	9.9 mg/L	1.0 mg/L	SD5
11/20/2009	Copper	0.1 mg/L	0.013 mg/L (CMC)	SD4

Date	Parameter	Observed Concentration	Basin Plan or EPA Water Quality Objective	Location (as identified by the Facility)
11/20/2009	Copper	0.1 mg/L	0.009 mg/L (CCC)	SD4
11/20/2009	Lead	0.11 mg/L	0.05 mg/L	SD1
11/20/2009	Lead	0.11 mg/L	0.065 mg/L (CMC)	SD1
11/20/2009	Lead	0.11 mg/L	0.0025 mg/L (CCC)	SD1
11/20/2009	Lead	0.13 mg/L	0.05 mg/L	SD4
11/20/2009	Lead	0.13 mg/L	0.065 mg/L (CMC)	SD4
11/20/2009	Lead	0.13 mg/L	0.0025 mg/L (CCC)	SD4
11/20/2009	Lead	0.11 mg/L	0.05 mg/L	SD5
11/20/2009	Lead	0.11 mg/L	0.065 mg/L (CMC)	SD5
11/20/2009	Lead	0.11 mg/L	0.0025 mg/L (CCC)	SD5
11/20/2009	Zinc	0.68 mg/L	0.12 mg/L (CMC & CCC)	SD1
11/20/2009	Zinc	1.2 mg/L	0.12 mg/L (CMC & CCC)	SD4
11/20/2009	Zinc	0.5 mg/L	0.12 mg/L (CMC & CCC)	SD5
2/6/2009	pH	9.16	6.5 – 8.5	SD4
2/6/2009	pH	9.49	6.5 – 8.5	SD5
2/6/2009	Aluminum	45 mg/L	1.0 mg/L	SD1
2/6/2009	Aluminum	22 mg/L	1.0 mg/L	SD4
2/6/2009	Aluminum	25 mg/L	1.0 mg/L	SD5
2/6/2009	Copper	0.21 mg/L	0.013 mg/L (CMC)	SD1
2/6/2009	Copper	0.21 mg/L	0.009 mg/L (CCC)	SD1
2/6/2009	Copper	0.16 mg/L	0.013 mg/L (CMC)	SD4
2/6/2009	Copper	0.16 mg/L	0.009 mg/L (CCC)	SD4
2/6/2009	Copper	0.11 mg/L	0.013 mg/L (CMC)	SD5
2/6/2009	Copper	0.11 mg/L	0.009 mg/L (CCC)	SD5
2/6/2009	Lead	0.24 mg/L	0.05 mg/L	SD1
2/6/2009	Lead	0.24 mg/L	0.065 mg/L (CMC)	SD1
2/6/2009	Lead	0.24 mg/L	0.0025 mg/L (CCC)	SD1
2/6/2009	Lead	0.11 mg/L	0.05 mg/L	SD4
2/6/2009	Lead	0.11 mg/L	0.065 mg/L (CMC)	SD4
2/6/2009	Lead	0.11 mg/L	0.0025 mg/L (CCC)	SD4
2/6/2009	Lead	0.15 mg/L	0.05 mg/L	SD5
2/6/2009	Lead	0.15 mg/L	0.065 mg/L (CMC)	SD5
2/6/2009	Lead	0.15 mg/L	0.0025 mg/L (CCC)	SD5
2/6/2009	Zinc	1.2 mg/L	0.12 mg/L (CMC & CCC)	SD1
2/6/2009	Zinc	0.92 mg/L	0.12 mg/L (CMC & CCC)	SD4
2/6/2009	Zinc	0.87 mg/L	0.12 mg/L (CMC & CCC)	SD5
1/22/2009	Oil & Grease Sheen Observed		Narrative – no sheen	SD1
11/3/2008	pH	8.56	6.5 – 8.5	SD4

Date	Parameter	Observed Concentration	Basin Plan or EPA Water Quality Objective	Location (as identified by the Facility)
11/3/2008	Aluminum	7.6 mg/L	1.0 mg/L	SD1
11/3/2008	Aluminum	17 mg/L	1.0 mg/L	SD4
11/3/2008	Aluminum	16 mg/L	1.0 mg/L	SD5
11/3/2008	Lead	0.08 mg/L	0.05 mg/L	SD1
11/3/2008	Lead	0.08 mg/L	0.065 mg/L (CMC)	SD1
11/3/2008	Lead	0.08 mg/L	0.0025 mg/L (CCC)	SD1
11/3/2008	Lead	0.072 mg/L	0.05 mg/L	SD4
11/3/2008	Lead	0.072 mg/L	0.065 mg/L (CMC)	SD4
11/3/2008	Lead	0.072 mg/L	0.0025 mg/L (CCC)	SD4
11/3/2008	Lead	0.06 mg/L	0.05 mg/L	SD5
11/3/2008	Lead	0.06 mg/L	0.0025 mg/L (CCC)	SD5
11/3/2008	Zinc	1.0 mg/L	0.12 mg/L (CMC & CCC)	SD1
11/3/2008	Zinc	0.47 mg/L	0.12 mg/L (CMC & CCC)	SD4
11/3/2008	Zinc	0.59 mg/L	0.12 mg/L (CMC & CCC)	SD5
11/3/2008	Oil & Grease Sheen Observed		Narrative – no sheen	SD4
4/23/2008	Aluminum	34 mg/L	1.0 mg/L	SD1
4/23/2008	Aluminum	70 mg/L	1.0 mg/L	SD4
4/23/2008	Copper	0.14 mg/L	0.013 mg/L (CMC)	SD1
4/23/2008	Copper	0.14 mg/L	0.009 mg/L (CCC)	SD1
4/23/2008	Copper	0.22 mg/L	0.013 mg/L (CMC)	SD4
4/23/2008	Copper	0.22 mg/L	0.009 mg/L (CCC)	SD4
4/23/2008	Lead	0.18 mg/L	0.05 mg/L	SD1
4/23/2008	Lead	0.18 mg/L	0.065 mg/L (CMC)	SD1
4/23/2008	Lead	0.18 mg/L	0.0025 mg/L (CCC)	SD1
4/23/2008	Lead	0.21 mg/L	0.05 mg/L	SD4
4/23/2008	Lead	0.21 mg/L	0.065 mg/L (CMC)	SD4
4/23/2008	Lead	0.21 mg/L	0.0025 mg/L (CCC)	SD4
4/23/2008	Zinc	0.93 mg/L	0.12 mg/L (CMC & CCC)	SD1
4/23/2008	Zinc	1.1 mg/L	0.12 mg/L (CMC & CCC)	SD4
2/18/2008	Oil & Grease Sheen Observed		Narrative – no sheen	Side Loader Parking Area
2/18/2008	Sediment Observed		Narrative	Side Loader Parking Area
1/25/2008	Aluminum	16 mg/L	1.0 mg/L	SD1
1/25/2008	Aluminum	40 mg/L	1.0 mg/L	SD4
1/25/2008	Copper	0.061 mg/L	0.013 mg/L (CMC)	SD1
1/25/2008	Copper	0.061 mg/L	0.009 mg/L (CCC)	SD1
1/25/2008	Copper	0.12 mg/L	0.013 mg/L (CMC)	SD4

Date	Parameter	Observed Concentration	Basin Plan or EPA Water Quality Objective	Location (as identified by the Facility)
1/25/2008	Copper	0.12 mg/L	0.009 mg/L (CCC)	SD4
1/25/2008	Lead	0.092 mg/L	0.05 mg/L	SD1
1/25/2008	Lead	0.092 mg/L	0.065 mg/L (CMC)	SD1
1/25/2008	Lead	0.092 mg/L	0.0025 mg/L (CCC)	SD1
1/25/2008	Lead	0.17 mg/L	0.05 mg/L	SD4
1/25/2008	Lead	0.17 mg/L	0.065 mg/L (CMC)	SD4
1/25/2008	Lead	0.17 mg/L	0.0025 mg/L (CCC)	SD4
1/25/2008	Zinc	0.49 mg/L	0.12 mg/L (CMC & CCC)	SD1
1/25/2008	Zinc	0.86 mg/L	0.12 mg/L (CMC & CCC)	SD4
1/4/2008	Aluminum	11 mg/L	1.0 mg/L	SD1
1/4/2008	Aluminum	22 mg/L	1.0 mg/L	SD4
1/4/2008	Aluminum	81 mg/L	1.0 mg/L	SD5
1/4/2008	Copper	0.1 mg/L	0.013 mg/L (CMC)	SD4
1/4/2008	Copper	0.1 mg/L	0.009 mg/L (CCC)	SD4
1/4/2008	Copper	0.16 mg/L	0.013 mg/L (CMC)	SD5
1/4/2008	Copper	0.16 mg/L	0.009 mg/L (CCC)	SD5
1/4/2008	Lead	0.056 mg/L	0.05 mg/L	SD1
1/4/2008	Lead	0.056 mg/L	0.0025 mg/L (CCC)	SD1
1/4/2008	Lead	0.14 mg/L	0.05 mg/L	SD4
1/4/2008	Lead	0.14 mg/L	0.065 mg/L (CMC)	SD4
1/4/2008	Lead	0.14 mg/L	0.0025 mg/L (CCC)	SD4
1/4/2008	Lead	0.11 mg/L	0.05 mg/L	SD5
1/4/2008	Lead	0.11 mg/L	0.065 mg/L (CMC)	SD5
1/4/2008	Lead	0.11 mg/L	0.0025 mg/L (CCC)	SD5
1/4/2008	Zinc	0.29 mg/L	0.12 mg/L (CMC & CCC)	SD1
1/4/2008	Zinc	0.9 mg/L	0.12 mg/L (CMC & CCC)	SD4
1/4/2008	Zinc	0.77 mg/L	0.12 mg/L (CMC & CCC)	SD5
12/6/2007	Aluminum	120 mg/L	1.0 mg/L	SD1
12/6/2007	Aluminum	700 mg/L	1.0 mg/L	SD4
12/6/2007	Aluminum	50 mg/L	1.0 mg/L	SD5
12/6/2007	Copper	0.4 mg/L	0.013 mg/L (CMC)	SD1
12/6/2007	Copper	0.4 mg/L	0.009 mg/L (CCC)	SD1
12/6/2007	Copper	1.7 mg/L	0.013 mg/L (CMC)	SD4
12/6/2007	Copper	1.7 mg/L	0.009 mg/L (CCC)	SD4
12/6/2007	Copper	0.19 mg/L	0.013 mg/L (CMC)	SD5
12/6/2007	Copper	0.19 mg/L	0.009 mg/L (CCC)	SD5
12/6/2007	Lead	0.49 mg/L	0.05 mg/L	SD1
12/6/2007	Lead	0.49 mg/L	0.065 mg/L (CMC)	SD1
12/6/2007	Lead	0.49 mg/L	0.0025 mg/L (CCC)	SD1

Date	Parameter	Observed Concentration	Basin Plan or EPA Water Quality Objective	Location (as identified by the Facility)
12/6/2007	Lead	1.3 mg/L	0.05 mg/L	SD4
12/6/2007	Lead	1.3 mg/L	0.065 mg/L (CMC)	SD4
12/6/2007	Lead	1.3 mg/L	0.0025 mg/L (CCC)	SD4
12/6/2007	Lead	0.27 mg/L	0.05 mg/L	SD5
12/6/2007	Lead	0.27 mg/L	0.065 mg/L (CMC)	SD5
12/6/2007	Lead	0.27 mg/L	0.0025 mg/L (CCC)	SD5
12/6/2007	Zinc	2.6 mg/L	0.12 mg/L (CMC & CCC)	SD1
12/6/2007	Zinc	7.8 mg/L	0.12 mg/L (CMC & CCC)	SD4
12/6/2007	Zinc	3.7 mg/L	0.12 mg/L (CMC & CCC)	SD5
10/12/2007	pH	8.66	6.5 – 8.5	SD1
10/12/2007	Aluminum	39 mg/L	1.0 mg/L	SD1
10/12/2007	Aluminum	94 mg/L	1.0 mg/L	SD4
10/12/2007	Copper	0.22 mg/L	0.013 mg/L (CMC)	SD1
10/12/2007	Copper	0.22 mg/L	0.009 mg/L (CCC)	SD1
10/12/2007	Copper	0.033 mg/L	0.013 mg/L (CMC)	SD4
10/12/2007	Copper	0.033 mg/L	0.009 mg/L (CCC)	SD4
10/12/2007	Lead	0.28 mg/L	0.05 mg/L	SD1
10/12/2007	Lead	0.28 mg/L	0.065 mg/L (CMC)	SD1
10/12/2007	Lead	0.28 mg/L	0.0025 mg/L (CCC)	SD1
10/12/2007	Lead	0.35 mg/L	0.05 mg/L	SD4
10/12/2007	Lead	0.35 mg/L	0.065 mg/L (CMC)	SD4
10/12/2007	Lead	0.35 mg/L	0.0025 mg/L (CCC)	SD4
10/12/2007	Zinc	2.5 mg/L	0.12 mg/L (CMC & CCC)	SD1
10/12/2007	Zinc	2.6 mg/L	0.12 mg/L (CMC & CCC)	SD4
10/12/2007	Zinc	0.14 mg/L	0.12 mg/L (CMC & CCC)	SD5
4/23/2007	Copper	1.7 mg/L	0.013 mg/L (CMC)	SD1
4/23/2007	Copper	1.7 mg/L	0.009 mg/L (CCC)	SD1
4/23/2007	Lead	0.064 mg/L	0.05 mg/L	SD1
4/23/2007	Lead	0.064 mg/L	0.0025 mg/L (CCC)	SD1
4/23/2007	Zinc	1.8 mg/L	0.12 mg/L (CMC & CCC)	SD1
2/26/2007	Aluminum	27 mg/L	1.0 mg/L	MP1
2/26/2007	Aluminum	19 mg/L	1.0 mg/L	MP2
2/26/2007	Aluminum	21 mg/L	1.0 mg/L	MP4
2/26/2007	Copper	0.11 mg/L	0.013 mg/L (CMC)	MP1
2/26/2007	Copper	0.11 mg/L	0.009 mg/L (CCC)	MP1
2/26/2007	Copper	0.1 mg/L	0.013 mg/L (CMC)	MP2
2/26/2007	Copper	0.1 mg/L	0.009 mg/L (CCC)	MP2
2/26/2007	Copper	0.11 mg/L	0.013 mg/L (CMC)	MP4
2/26/2007	Copper	0.11 mg/L	0.009 mg/L (CCC)	MP4

Date	Parameter	Observed Concentration	Basin Plan or EPA Water Quality Objective	Location (as identified by the Facility)
2/26/2007	Lead	0.33 mg/L	0.05 mg/L	MP1
2/26/2007	Lead	0.33 mg/L	0.065 mg/L (CMC)	MP1
2/26/2007	Lead	0.33 mg/L	0.0025 mg/L (CCC)	MP1
2/26/2007	Lead	0.28 mg/L	0.05 mg/L	MP2
2/26/2007	Lead	0.28 mg/L	0.065 mg/L (CMC)	MP2
2/26/2007	Lead	0.28 mg/L	0.0025 mg/L (CCC)	MP2
2/26/2007	Lead	0.21 mg/L	0.05 mg/L	MP4
2/26/2007	Lead	0.21 mg/L	0.065 mg/L (CMC)	MP4
2/26/2007	Lead	0.21 mg/L	0.0025 mg/L (CCC)	MP4
2/26/2007	Zinc	1.0 mg/L	0.12 mg/L (CMC & CCC)	MP1
2/26/2007	Zinc	0.92 mg/L	0.12 mg/L (CMC & CCC)	MP2
2/26/2007	Zinc	1.3 mg/L	0.12 mg/L (CMC & CCC)	MP4
11/13/2006	pH	9.7	6.5 – 8.5	SD1
11/13/2006	Aluminum	29 mg/L	1.0 mg/L	SD1
11/13/2006	Aluminum	9.2 mg/L	1.0 mg/L	SD4
11/13/2006	Copper	0.13 mg/L	0.013 mg/L (CMC)	SD1
11/13/2006	Copper	0.13 mg/L	0.009 mg/L (CCC)	SD1
11/13/2006	Lead	0.14 mg/L	0.05 mg/L	SD1
11/13/2006	Lead	0.14 mg/L	0.065 mg/L (CMC)	SD1
11/13/2006	Lead	0.14 mg/L	0.0025 mg/L (CCC)	SD1
11/13/2006	Zinc	1.1 mg/L	0.12 mg/L (CMC & CCC)	SD1
11/13/2006	Zinc	0.35 mg/L	0.12 mg/L (CMC & CCC)	SD4
10/4/2006	Oil & Grease Sheen Observed		Narrative – no sheen	Parking Area
10/4/2006	Sediment Observed		Narrative	Parking Area
2/27/2006	Aluminum	3.6 mg/L	1.0 mg/L	MP1
2/27/2006	Aluminum	3.2 mg/L	1.0 mg/L	MP2
2/27/2006	Aluminum	3.0 mg/L	1.0 mg/L	MP3
2/27/2006	Aluminum	5.6 mg/L	1.0 mg/L	SD1
2/27/2006	Zinc	0.43 mg/L	0.12 mg/L (CMC & CCC)	MP1
2/27/2006	Zinc	0.38 mg/L	0.12 mg/L (CMC & CCC)	MP2
2/27/2006	Zinc	0.33 mg/L	0.12 mg/L (CMC & CCC)	MP3
2/27/2006	Zinc	0.21 mg/L	0.12 mg/L (CMC & CCC)	SD1
1/30/2006	Aluminum	17 mg/L	1.0 mg/L	MP1
1/30/2006	Aluminum	19 mg/L	1.0 mg/L	MP3
1/30/2006	Aluminum	17 mg/L	1.0 mg/L	SD1
1/30/2006	Lead	0.078 mg/L	0.05 mg/L	MP1
1/30/2006	Lead	0.078 mg/L	0.065 mg/L (CMC)	MP1

Date	Parameter	Observed Concentration	Basin Plan or EPA Water Quality Objective	Location (as identified by the Facility)
1/30/2006	Lead	0.078 mg/L	0.0025 mg/L (CCC)	MP1
1/30/2006	Lead	0.13 mg/L	0.05 mg/L	MP3
1/30/2006	Lead	0.13 mg/L	0.065 mg/L (CMC)	MP3
1/30/2006	Lead	0.13 mg/L	0.0025 mg/L (CCC)	MP3
1/30/2006	Lead	0.087 mg/L	0.05 mg/L	SD1
1/30/2006	Lead	0.087 mg/L	0.065 mg/L (CMC)	SD1
1/30/2006	Lead	0.087 mg/L	0.0025 mg/L (CCC)	SD1
1/30/2006	Zinc	0.51 mg/L	0.12 mg/L (CMC & CCC)	MP1
1/30/2006	Zinc	0.81 mg/L	0.12 mg/L (CMC & CCC)	MP3
1/30/2006	Zinc	0.54 mg/L	0.12 mg/L (CMC & CCC)	SD1
1/3/2006	Aluminum	8.4 mg/L	1.0 mg/L	MP1
1/3/2006	Aluminum	52 mg/L	1.0 mg/L	MP2
1/3/2006	Copper	0.13 mg/L	0.013 mg/L (CMC)	MP2
1/3/2006	Copper	0.13 mg/L	0.009 mg/L (CCC)	MP2
1/3/2006	Zinc	0.72 mg/L	0.12 mg/L (CMC & CCC)	MP1
1/3/2006	Zinc	0.5 mg/L	0.12 mg/L (CMC & CCC)	MP2

The information in the above table reflects data gathered from WSCD's self-monitoring during the 2005-2006, 2006-2007, 2007-2008, 2008-2009, and 2009-2010 rainy seasons. CSPA and PRC allege that during the each of those rainy seasons and continuing through today, WSCD has discharged storm water contaminated with pollutants at levels that exceed one or more applicable water quality standards, including but not limited to each of the following:

- Aluminum – 1 mg/L
- Lead – 0.05 mg/L
- Lead – 0.065 mg/L (CMC)
- Lead – 0.0025 mg/L (CCC or 4-day average)
- Zinc – 0.12 mg/L (CMC and CCC)
- Copper – 0.013 mg/L (CMC)
- Copper – 0.009 mg/L (CCC or 4-day average)
- Oil & Grease – no sheen
- pH – not less than 6.5 or greater than 8.5

The following discharges of pollutants from the Facility have violated Discharge Prohibitions A(1) and A(2) and Receiving Water Limitations C(1) and C(2) and are evidence of ongoing violations of Effluent Limitation B(3) of the General Industrial Storm Water Permit:

Date	Parameter	Observed Concentration	Benchmark Value	Location (as identified by the Facility)
1/25/2010	TSS	560 mg/L	100 mg/L	SD1
1/25/2010	TSS	460 mg/L	100 mg/L	SD4
1/25/2010	TSS	560 mg/L	100 mg/L	SD5
1/25/2010	Aluminum	27 mg/L	0.75 mg/L	SD1
1/25/2010	Aluminum	16 mg/L	0.75 mg/L	SD4
1/25/2010	Aluminum	32 mg/L	0.75 mg/L	SD5
1/25/2010	Iron	29 mg/L	1.0 mg/L	SD1
1/25/2010	Iron	16 mg/L	1.0 mg/L	SD4
1/25/2010	Iron	36 mg/L	1.0 mg/L	SD5
1/25/2010	Zinc	0.29 mg/L	0.117 mg/L	SD1
1/25/2010	Zinc	0.39 mg/L	0.117 mg/L	SD4
1/25/2010	Zinc	1.4 mg/L	0.117 mg/L	SD5
1/25/2010	COD	180 mg/L	120 mg/L	SD1
1/25/2010	COD	180 mg/L	120 mg/L	SD4
1/25/2010	COD	220 mg/L	120 mg/L	SD5
1/21/2010	TSS	570 mg/L	100 mg/L	SD1
1/21/2010	TSS	240 mg/L	100 mg/L	SD4
1/21/2010	Oil & Grease	110 mg/L	15 mg/L	SD5
1/21/2010	Aluminum	24 mg/L	0.75 mg/L	SD1
1/21/2010	Aluminum	9.7 mg/L	0.75 mg/L	SD4
1/21/2010	Aluminum	16 mg/L	0.75 mg/L	SD5
1/21/2010	Copper	0.1 mg/L	0.0636 mg/L	SD1
1/21/2010	Iron	30 mg/L	1.0 mg/L	SD1
1/21/2010	Iron	13 mg/L	1.0 mg/L	SD4
1/21/2010	Iron	22 mg/L	1.0 mg/L	SD5
1/21/2010	Zinc	0.77 mg/L	0.117 mg/L	SD1
1/21/2010	Zinc	0.41 mg/L	0.117 mg/L	SD4
1/21/2010	Zinc	0.37 mg/L	0.117 mg/L	SD5
1/21/2010	COD	150 mg/L	120 mg/L	SD4
1/21/2010	COD	550 mg/L	120 mg/L	SD5
1/18/2010	TSS	1800 mg/L	100 mg/L	SD1
1/18/2010	TSS	2100 mg/L	100 mg/L	SD4
1/18/2010	TSS	930 mg/L	100 mg/L	SD5
1/18/2010	Oil & Grease	22 mg/L	15 mg/L	SD1
1/18/2010	Oil & Grease	140 mg/L	15 mg/L	SD4
1/18/2010	Aluminum	21 mg/L	0.75 mg/L	SD1
1/18/2010	Aluminum	30 mg/L	0.75 mg/L	SD4
1/18/2010	Aluminum	14 mg/L	0.75 mg/L	SD5

Date	Parameter	Observed Concentration	Benchmark Value	Location (as identified by the Facility)
1/18/2010	Copper	0.12 mg/L	0.0636 mg/L	SD4
1/18/2010	Iron	32 mg/L	1.0 mg/L	SD1
1/18/2010	Iron	49 mg/L	1.0 mg/L	SD4
1/18/2010	Iron	19 mg/L	1.0 mg/L	SD5
1/18/2010	Lead	0.14 mg/L	0.0816 mg/L	SD1
1/18/2010	Lead	0.24 mg/L	0.0816 mg/L	SD4
1/18/2010	Zinc	0.69 mg/L	0.117 mg/L	SD1
1/18/2010	Zinc	2.6 mg/L	0.117 mg/L	SD4
1/18/2010	Zinc	0.38 mg/L	0.117 mg/L	SD5
11/20/2009	TSS	530 mg/L	100 mg/L	SD1
11/20/2009	TSS	380 mg/L	100 mg/L	SD4
11/20/2009	TSS	640 mg/L	100 mg/L	SD5
11/20/2009	Oil & Grease	37 mg/L	15 mg/L	SD1
11/20/2009	Aluminum	18 mg/L	0.75 mg/L	SD1
11/20/2009	Aluminum	31 mg/L	0.75 mg/L	SD4
11/20/2009	Aluminum	9.9 mg/L	0.75 mg/L	SD5
11/20/2009	Copper	0.11 mg/L	0.0636 mg/L	SD4
11/20/2009	Iron	23 mg/L	1.0 mg/L	SD1
11/20/2009	Iron	39 mg/L	1.0 mg/L	SD4
11/20/2009	Iron	13 mg/L	1.0 mg/L	SD5
11/20/2009	Lead	0.11 mg/L	0.0816 mg/L	SD1
11/20/2009	Lead	0.13 mg/L	0.0816 mg/L	SD4
11/20/2009	Lead	0.11 mg/L	0.0816 mg/L	SD5
11/20/2009	Zinc	0.68 mg/L	0.117 mg/L	SD1
11/20/2009	Zinc	1.2 mg/L	0.117 mg/L	SD4
11/20/2009	Zinc	0.5 mg/L	0.117 mg/L	SD5
11/20/2009	COD	370 mg/L	120 mg/L	SD5
2/6/2009	pH	9.16	6.0 – 9.0	SD4
2/6/2009	pH	9.49	6.0 – 9.0	SD5
2/6/2009	TSS	1000 mg/L	100 mg/L	SD1
2/6/2009	TSS	2000 mg/L	100 mg/L	SD4
2/6/2009	TSS	1100 mg/L	100 mg/L	SD5
2/6/2009	Specific Conductivity	596 µmho/cm	200 µmho/cm (proposed)	SD5
2/6/2009	Oil & Grease	49 mg/L	15 mg/L	SD5
2/6/2009	Aluminum	45 mg/L	0.75 mg/L	SD1
2/6/2009	Aluminum	22 mg/L	0.75 mg/L	SD4
2/6/2009	Aluminum	25 mg/L	0.75 mg/L	SD5
2/6/2009	Copper	0.21 mg/L	0.0636 mg/L	SD1

Date	Parameter	Observed Concentration	Benchmark Value	Location (as identified by the Facility)
2/6/2009	Copper	0.16 mg/L	0.0636 mg/L	SD4
2/6/2009	Copper	0.11 mg/L	0.0636 mg/L	SD5
2/6/2009	Iron	64 mg/L	1.0 mg/L	SD1
2/6/2009	Iron	28 mg/L	1.0 mg/L	SD4
2/6/2009	Iron	32 mg/L	1.0 mg/L	SD5
2/6/2009	Lead	0.24 mg/L	0.0816 mg/L	SD1
2/6/2009	Lead	0.11 mg/L	0.0816 mg/L	SD4
2/6/2009	Lead	0.15 mg/L	0.0816 mg/L	SD5
2/6/2009	Zinc	1.2 mg/L	0.117 mg/L	SD1
2/6/2009	Zinc	0.92 mg/L	0.117 mg/L	SD4
2/6/2009	Zinc	0.87 mg/L	0.117 mg/L	SD5
2/6/2009	COD	690 mg/L	120 mg/L	SD1
2/6/2009	COD	900 mg/L	120 mg/L	SD4
2/6/2009	COD	470 mg/L	120 mg/L	SD5
11/3/2008	TSS	340 mg/L	100 mg/L	SD1
11/3/2008	TSS	830 mg/L	100 mg/L	SD4
11/3/2008	TSS	590 mg/L	100 mg/L	SD5
11/3/2008	Oil & Grease	40 mg/L	15 mg/L	SD1
11/3/2008	Aluminum	7.6 mg/L	0.75 mg/L	SD1
11/3/2008	Aluminum	17 mg/L	0.75 mg/L	SD4
11/3/2008	Aluminum	16 mg/L	0.75 mg/L	SD5
11/3/2008	Iron	9.4 mg/L	1.0 mg/L	SD1
11/3/2008	Iron	23 mg/L	1.0 mg/L	SD4
11/3/2008	Iron	23 mg/L	1.0 mg/L	SD5
11/3/2008	Zinc	1.0 mg/L	0.117 mg/L	SD1
11/3/2008	Zinc	0.47 mg/L	0.117 mg/L	SD4
11/3/2008	Zinc	0.59 mg/L	0.117 mg/L	SD5
11/3/2008	COD	390 mg/L	120 mg/L	SD1
11/3/2008	COD	360 mg/L	120 mg/L	SD4
11/3/2008	COD	490 mg/L	120 mg/L	SD5
4/23/2008	TSS	1200 mg/L	100 mg/L	SD1
4/23/2008	TSS	4700 mg/L	100 mg/L	SD4
4/23/2008	Specific Conductivity	878 µmho/cm	200 µmho/cm (proposed)	SD1
4/23/2008	Specific Conductivity	1000 µmho/cm	200 µmho/cm (proposed)	SD4
4/23/2008	Aluminum	34 mg/L	0.75 mg/L	SD1
4/23/2008	Aluminum	70 mg/L	0.75 mg/L	SD4
4/23/2008	Copper	0.14 mg/L	0.0636 mg/L	SD1

Date	Parameter	Observed Concentration	Benchmark Value	Location (as identified by the Facility)
4/23/2008	Copper	0.22 mg/L	0.0636 mg/L	SD4
4/23/2008	Iron	54 mg/L	1.0 mg/L	SD1
4/23/2008	Iron	98 mg/L	1.0 mg/L	SD4
4/23/2008	Lead	0.18 mg/L	0.0816 mg/L	SD1
4/23/2008	Lead	0.21 mg/L	0.0816 mg/L	SD4
4/23/2008	Zinc	0.93 mg/L	0.117 mg/L	SD1
4/23/2008	Zinc	1.1 mg/L	0.117 mg/L	SD4
4/23/2008	COD	760 mg/L	120 mg/L	SD1
4/23/2008	COD	1700 mg/L	120 mg/L	SD4
1/25/2008	TSS	690 mg/L	100 mg/L	SD1
1/25/2008	TSS	1500 mg/L	100 mg/L	SD4
1/25/2008	Oil & Grease	18 mg/L	15 mg/L	SD1
1/25/2008	Aluminum	16 mg/L	0.75 mg/L	SD1
1/25/2008	Aluminum	40 mg/L	0.75 mg/L	SD4
1/25/2008	Copper	0.12 mg/L	0.0636 mg/L	SD4
1/25/2008	Iron	28 mg/L	1.0 mg/L	SD1
1/25/2008	Iron	80 mg/L	1.0 mg/L	SD4
1/25/2008	Lead	0.092 mg/L	0.0816 mg/L	SD1
1/25/2008	Lead	0.17 mg/L	0.0816 mg/L	SD4
1/25/2008	Zinc	0.49 mg/L	0.117 mg/L	SD1
1/25/2008	Zinc	0.86 mg/L	0.117 mg/L	SD4
1/25/2008	COD	240 mg/L	120 mg/L	SD4
1/4/2008	TSS	230 mg/L	100 mg/L	SD1
1/4/2008	TSS	860 mg/L	100 mg/L	SD4
1/4/2008	TSS	2300 mg/L	100 mg/L	SD5
1/4/2008	Aluminum	11 mg/L	0.75 mg/L	SD1
1/4/2008	Aluminum	22 mg/L	0.75 mg/L	SD4
1/4/2008	Aluminum	81 mg/L	0.75 mg/L	SD5
1/4/2008	Copper	0.1 mg/L	0.0636 mg/L	SD4
1/4/2008	Copper	0.16 mg/L	0.0636 mg/L	SD5
1/4/2008	Iron	14 mg/L	1.0 mg/L	SD1
1/4/2008	Iron	35 mg/L	1.0 mg/L	SD4
1/4/2008	Iron	120 mg/L	1.0 mg/L	SD5
1/4/2008	Lead	0.14 mg/L	0.0816 mg/L	SD4
1/4/2008	Lead	0.11 mg/L	0.0816 mg/L	SD5
1/4/2008	Zinc	0.29 mg/L	0.117 mg/L	SD1
1/4/2008	Zinc	0.9 mg/L	0.117 mg/L	SD4
1/4/2008	Zinc	0.77 mg/L	0.117 mg/L	SD5
1/4/2008	COD	170 mg/L	120 mg/L	SD1

Date	Parameter	Observed Concentration	Benchmark Value	Location (as identified by the Facility)
1/4/2008	COD	580 mg/L	120 mg/L	SD4
1/4/2008	COD	180 mg/L	120 mg/L	SD5
12/6/2007	TSS	6600 mg/L	100 mg/L	SD1
12/6/2007	TSS	5800 mg/L	100 mg/L	SD4
12/6/2007	TSS	470 mg/L	100 mg/L	SD5
12/6/2007	Oil & Grease	25 mg/L	15 mg/L	SD4
12/6/2007	Aluminum	120 mg/L	0.75 mg/L	SD1
12/6/2007	Aluminum	700 mg/L	0.75 mg/L	SD4
12/6/2007	Aluminum	50 mg/L	0.75 mg/L	SD5
12/6/2007	Copper	0.4 mg/L	0.0636 mg/L	SD1
12/6/2007	Copper	1.7 mg/L	0.0636 mg/L	SD4
12/6/2007	Copper	0.19 mg/L	0.0636 mg/L	SD5
12/6/2007	Iron	180 mg/L	1.0 mg/L	SD1
12/6/2007	Iron	1100 mg/L	1.0 mg/L	SD4
12/6/2007	Iron	77 mg/L	1.0 mg/L	SD5
12/6/2007	Lead	0.49 mg/L	0.0816 mg/L	SD1
12/6/2007	Lead	1.3 mg/L	0.0816 mg/L	SD4
12/6/2007	Lead	0.27 mg/L	0.0816 mg/L	SD5
12/6/2007	Zinc	2.6 mg/L	0.117 mg/L	SD1
12/6/2007	Zinc	7.8 mg/L	0.117 mg/L	SD4
12/6/2007	Zinc	3.7 mg/L	0.117 mg/L	SD5
12/6/2007	COD	170 mg/L	120 mg/L	SD1
12/6/2007	COD	520 mg/L	120 mg/L	SD4
12/6/2007	COD	260 mg/L	120 mg/L	SD5
10/12/2007	TSS	1000 mg/L	100 mg/L	SD1
10/12/2007	TSS	3600 mg/L	100 mg/L	SD4
10/12/2007	Oil & Grease	41 mg/L	15 mg/L	SD1
10/12/2007	Aluminum	39 mg/L	0.75 mg/L	SD1
10/12/2007	Aluminum	94 mg/L	0.75 mg/L	SD4
10/12/2007	Copper	0.22 mg/L	0.0636 mg/L	SD1
10/12/2007	Iron	87 mg/L	1.0 mg/L	SD1
10/12/2007	Iron	190 mg/L	1.0 mg/L	SD4
10/12/2007	Iron	1.1 mg/L	1.0 mg/L	US1
10/12/2007	Lead	0.28 mg/L	0.0816 mg/L	SD1
10/12/2007	Lead	0.35 mg/L	0.0816 mg/L	SD4
10/12/2007	Zinc	2.5 mg/L	0.117 mg/L	SD1
10/12/2007	Zinc	2.6 mg/L	0.117 mg/L	SD4
10/12/2007	Zinc	0.14 mg/L	0.117 mg/L	US1
10/12/2007	COD	260 mg/L	120 mg/L	SD4

Date	Parameter	Observed Concentration	Benchmark Value	Location (as identified by the Facility)
4/23/2007	TSS	190 mg/L	100 mg/L	SD1
4/23/2007	Copper	1.7 mg/L	0.0636 mg/L	SD1
4/23/2007	Zinc	1.8 mg/L	0.117 mg/L	SD1
4/23/2007	COD	290 mg/L	120 mg/L	SD1
2/26/2007	TSS	1500 mg/L	100 mg/L	MP1
2/26/2007	TSS	2200 mg/L	100 mg/L	MP2
2/26/2007	TSS	1600 mg/L	100 mg/L	MP4
2/26/2007	Oil & Grease	16 mg/L	15 mg/L	MP2
2/26/2007	Aluminum	27 mg/L	0.75 mg/L	MP1
2/26/2007	Aluminum	19 mg/L	0.75 mg/L	MP2
2/26/2007	Aluminum	21 mg/L	0.75 mg/L	MP4
2/26/2007	Copper	0.11 mg/L	0.0636 mg/L	MP1
2/26/2007	Copper	0.1 mg/L	0.0636 mg/L	MP2
2/26/2007	Copper	0.11 mg/L	0.0636 mg/L	MP4
2/26/2007	Iron	60 mg/L	1.0 mg/L	MP1
2/26/2007	Iron	38 mg/L	1.0 mg/L	MP2
2/26/2007	Iron	50 mg/L	1.0 mg/L	MP4
2/26/2007	Lead	0.33 mg/L	0.0816 mg/L	MP1
2/26/2007	Lead	0.28 mg/L	0.0816 mg/L	MP2
2/26/2007	Lead	0.21 mg/L	0.0816 mg/L	MP4
2/26/2007	Zinc	1.0 mg/L	0.117 mg/L	MP1
2/26/2007	Zinc	0.92 mg/L	0.117 mg/L	MP2
2/26/2007	Zinc	1.3 mg/L	0.117 mg/L	MP4
2/26/2007	COD	410 mg/L	120 mg/L	MP1
2/26/2007	COD	820 mg/L	120 mg/L	MP2
2/26/2007	COD	610 mg/L	120 mg/L	MP4
11/13/2006	pH	9.7	6.0 – 9.0	SD1
11/13/2006	TSS	1300 mg/L	100 mg/L	SD1
11/13/2006	TSS	710 mg/L	100 mg/L	SD4
11/13/2006	Specific Conductivity	299 µmho/cm	200 µmho/cm (proposed)	SD1
11/13/2006	Oil & Grease	410 mg/L	15 mg/L	SD1
11/13/2006	Oil & Grease	21 mg/L	15 mg/L	SD4
11/13/2006	Aluminum	29 mg/L	0.75 mg/L	SD1
11/13/2006	Aluminum	9.2 mg/L	0.75 mg/L	SD4
11/13/2006	Copper	0.13 mg/L	0.0636 mg/L	SD1
11/13/2006	Iron	4.6 mg/L	1.0 mg/L	SD1
11/13/2006	Iron	12 mg/L	1.0 mg/L	SD4
11/13/2006	Lead	0.14 mg/L	0.0816 mg/L	SD1

Date	Parameter	Observed Concentration	Benchmark Value	Location (as identified by the Facility)
11/13/2006	Zinc	1.1 mg/L	0.117 mg/L	SD1
11/13/2006	Zinc	0.35 mg/L	0.117 mg/L	SD4
11/13/2006	COD	1000 mg/L	120 mg/L	SD1
11/13/2006	COD	270 mg/L	120 mg/L	SD4
2/27/2006	TSS	130 mg/L	100 mg/L	MP1
2/27/2006	TSS	160 mg/L	100 mg/L	MP2
2/27/2006	TSS	110 mg/L	100 mg/L	MP3
2/27/2006	TSS	230 mg/L	100 mg/L	SD1
2/27/2006	Aluminum	3.6 mg/L	0.75 mg/L	MP1
2/27/2006	Aluminum	3.2 mg/L	0.75 mg/L	MP2
2/27/2006	Aluminum	3.0 mg/L	0.75 mg/L	MP3
2/27/2006	Aluminum	5.6 mg/L	0.75 mg/L	SD1
2/27/2006	Iron	7.0 mg/L	1.0 mg/L	MP1
2/27/2006	Iron	6.3 mg/L	1.0 mg/L	MP2
2/27/2006	Iron	6.0 mg/L	1.0 mg/L	MP3
2/27/2006	Iron	10 mg/L	1.0 mg/L	SD1
2/27/2006	Zinc	0.43 mg/L	0.117 mg/L	MP1
2/27/2006	Zinc	0.38 mg/L	0.117 mg/L	MP2
2/27/2006	Zinc	0.33 mg/L	0.117 mg/L	MP3
2/27/2006	Zinc	0.21 mg/L	0.117 mg/L	SD1
2/27/2006	COD	200 mg/L	120 mg/L	MP1
2/27/2006	COD	160 mg/L	120 mg/L	MP2
2/27/2006	COD	190 mg/L	120 mg/L	MP3
2/27/2006	COD	540 mg/L	120 mg/L	SD1
1/30/2006	TSS	640 mg/L	100 mg/L	MP1
1/30/2006	TSS	340 mg/L	100 mg/L	MP3
1/30/2006	TSS	300 mg/L	100 mg/L	SD1
1/30/2006	Aluminum	17 mg/L	0.75 mg/L	MP1
1/30/2006	Aluminum	19 mg/L	0.75 mg/L	MP3
1/30/2006	Aluminum	17 mg/L	0.75 mg/L	SD1
1/30/2006	Iron	24 mg/L	1.0 mg/L	MP1
1/30/2006	Iron	35 mg/L	1.0 mg/L	MP3
1/30/2006	Iron	26 mg/L	1.0 mg/L	SD1
1/30/2006	Lead	0.13 mg/L	0.0816 mg/L	MP3
1/30/2006	Lead	0.087 mg/L	0.0816 mg/L	SD1
1/30/2006	Zinc	0.51 mg/L	0.117 mg/L	MP1
1/30/2006	Zinc	0.81 mg/L	0.117 mg/L	MP3
1/30/2006	Zinc	0.54 mg/L	0.117 mg/L	SD1
1/3/2006	TSS	500 mg/L	100 mg/L	MP1

Date	Parameter	Observed Concentration	Benchmark Value	Location (as identified by the Facility)
1/3/2006	TSS	130 mg/L	100 mg/L	MP2
1/3/2006	Oil & Grease	48 mg/L	15 mg/L	MP1
1/3/2006	Aluminum	8.4 mg/L	0.75 mg/L	MP1
1/3/2006	Aluminum	52 mg/L	0.75 mg/L	MP2
1/3/2006	Copper	0.13 mg/L	0.0636 mg/L	MP2
1/3/2006	Iron	13 mg/L	1.0 mg/L	MP1
1/3/2006	Iron	86 mg/L	1.0 mg/L	MP2
1/3/2006	Zinc	0.72 mg/L	0.117 mg/L	MP1
1/3/2006	Zinc	0.5 mg/L	0.117 mg/L	MP2
1/3/2006	COD	320 mg/L	120 mg/L	MP1
1/3/2006	COD	300 mg/L	120 mg/L	MP2

The information in the above table reflects data gathered from WSCD's self-monitoring during the 2005-2006, 2006-2007, 2007-2008, 2008-2009, and 2009-2010 rainy seasons. CSPA and PRC allege that during the each of those rainy seasons and continuing through today, WSCD has discharged storm water contaminated with pollutants at levels that exceed one or more applicable EPA Benchmarks, including but not limited to each of the following:

- pH – 6.0 – 9.0
- Total Suspended Solids – 100 mg/L
- Oil & Grease – 15 mg/L
- Chemical Oxygen Demand – 120 mg/L
- Aluminum – 0.75 mg/L
- Zinc – 0.117 mg/L
- Iron – 1 mg/L
- Copper – 0.0636 mg/L
- Lead – 0.0816 mg/L

CSPA's and PRC's investigation, including their review of WSCD's analytical results documenting pollutant levels in the Facility's storm water discharges well in excess of applicable water quality standards, EPA's benchmark values, and the State Board's proposed benchmark for electrical conductivity, indicates that WSCD has not implemented BAT and BCT at the Facility for its discharges of TSS, pH, oil and grease, specific conductivity, aluminum, copper, iron, lead, zinc, COD, and other pollutants in violation of Effluent Limitation B(3) of the General Permit. WSCD was required to have implemented BAT and BCT by no later than November 19, 1996. Thus, WSCD is discharging polluted storm water associated with its industrial operations without having implemented BAT and BCT.

In addition, the above numbers and observations indicate that the Facility is discharging polluted storm water in violation of Discharge Prohibitions A(1) and A(2) and Receiving Water

Limitations C(1) and C(2) of the General Permit. CSPA and PRC also allege that such violations have occurred and will occur on other rain dates, including every significant rain event that has occurred since at least June 4, 2005, and that will occur at the Facility subsequent to the date of this Notice of Violation and Intent to File Suit. Attachment A, attached hereto, sets forth each of the specific rain dates on which CSPA and PRC allege that WSCD has discharged storm water containing impermissible levels of TSS, pH, oil and grease, specific conductivity, aluminum, copper, iron, lead, zinc, and COD in violation of Effluent Limitation B(3), Discharge Prohibitions A(1) and A(2), and Receiving Water Limitations C(1) and C(2) of the General Permit.

These unlawful discharges from the Facility are ongoing. Each discharge of storm water containing any of these pollutants constitutes a separate violation of the General Industrial Storm Water Permit and the Act. Consistent with the five-year statute of limitations applicable to citizen enforcement actions brought pursuant to the federal Clean Water Act, WSCD is subject to penalties for violations of the General Permit and the Act since June 4, 2005.

B. Failure to Sample and Analyze Storm Events and Mandatory Parameters

With some limited adjustments, facilities covered by the General Permit must sample two storm events per season from each of their storm water discharge locations. General Permit, Section B(5)(a). “Facility operators shall collect storm water samples during the first hour of discharge from (1) the first storm event of the wet season, and (2) at least one other storm event in the wet season.” *Id.* “All storm water discharge locations shall be sampled.” *Id.* “Facility operators that do not collect samples from the first storm event of the wet season are still required to collect samples from two other storm events of the wet season and shall explain in the Annual Report why the first storm event was not sampled.” *Id.* Collected samples must be analyzed for TSS, pH, specific conductance, and either TOC or O&G. *Id.* at Section B(5)(c)(i). On information and belief, CSPA and PRC allege that WSCD failed to sample a second storm event from discharge location SD5 during the 2007-2008 rainy season, and failed to sample a second storm event from one of its three discharge locations during the 2006-2007 rainy season for a total of two violations of the General Permit. These violations are ongoing. Consistent with the five-year statute of limitations applicable to citizen enforcement actions brought pursuant to the federal Clean Water Act, WSCD is subject to penalties for violations of the General Permit and the Act since June 4, 2005.

Additionally, on information and belief, CSPA’s and PRC’s review of WSCD’s monitoring data indicates that it failed to analyze for pH and specific conductance in the following samples taken on the following dates at the identified storm water discharge locations at the Facility:

Date	Pollutant Not Analyzed	Location (as identified by the Facility)
2/26/2007	pH	MP1
2/26/2007	pH	MP2
2/26/2007	pH	MP4
2/26/2007	Specific Conductance	MP1
2/26/2007	Specific Conductance	MP2
2/26/2007	Specific Conductance	MP4
11/13/2006	pH	SD4
11/13/2006	Specific Conductance	SD4

Each of the above listed failures to analyze for pH and specific conductance is a violation of General Permit, Section B(5)(c)(i). These violations are ongoing. Consistent with the five-year statute of limitations applicable to citizen enforcement actions brought pursuant to the federal Clean Water Act, WSCD is subject to penalties for violations of the General Permit and the Act since June 4, 2005.

C. Failure to Prepare, Implement, Review and Update an Adequate Storm Water Pollution Prevention Plan.

Section A and Provision E(2) of the General Industrial Storm Water Permit require dischargers of storm water associated with industrial activity to develop, implement, and update an adequate storm water pollution prevention plan (“SWPPP”) no later than October 1, 1992. Section A(1) and Provision E(2) requires dischargers who submitted an NOI pursuant to the General Permit to continue following their existing SWPPP and implement any necessary revisions to their SWPPP in a timely manner, but in any case, no later than August 1, 1997.

The SWPPP must, among other requirements, identify and evaluate sources of pollutants associated with industrial activities that may affect the quality of storm and non-storm water discharges from the facility and identify and implement site-specific best management practices (“BMPs”) to reduce or prevent pollutants associated with industrial activities in storm water and authorized non-storm water discharges (General Permit, Section A(2)). The SWPPP must include BMPs that achieve BAT and BCT (Effluent Limitation B(3)). The SWPPP must include: a description of individuals and their responsibilities for developing and implementing the SWPPP (General Permit, Section A(3)); a site map showing the facility boundaries, storm water drainage areas with flow pattern and nearby water bodies, the location of the storm water collection, conveyance and discharge system, structural control measures, impervious areas, areas of actual and potential pollutant contact, and areas of industrial activity (General Permit, Section A(4)); a list of significant materials handled and stored at the site (General Permit, Section A(5)); a description of potential pollutant sources including industrial processes, material handling and storage areas, dust and particulate generating activities, a description of

significant spills and leaks, a list of all non-storm water discharges and their sources, and a description of locations where soil erosion may occur (General Permit, Section A(6)).

The SWPPP also must include an assessment of potential pollutant sources at the Facility and a description of the BMPs to be implemented at the Facility that will reduce or prevent pollutants in storm water discharges and authorized non-storm water discharges, including structural BMPs where non-structural BMPs are not effective (General Permit, Section A(7), (8)). The SWPPP must be evaluated to ensure effectiveness and must be revised where necessary (General Permit, Section A(9),(10)).

CSPA's and PRC's investigation of the conditions at the Facility as well as WSCD's Annual Reports indicates that WSCD has been operating with an inadequately developed or implemented SWPPP in violation of the requirements set forth above. WSCD has failed to evaluate the effectiveness of its BMPs, to implement structural BMPs, and to revise its SWPPP as necessary. WSCD has failed to implement BAT and BCT at the facility. WSCD has been in continuous violation of Section A and Provision E(2) of the General Permit every day since at least June 4, 2005, and will continue to be in violation every day that WSCD fails to prepare, implement, review, and update an effective SWPPP. WSCD is subject to penalties for violations of the Order and the Act occurring since June 4, 2005.

D. Failure to Develop and Implement an Adequate Monitoring and Reporting Program

Section B of the General Permit describes the monitoring requirements for storm water and non-storm water discharges. Facilities are required to make monthly visual observations of storm water discharges (Section B(4)) and quarterly visual observations of both unauthorized and authorized non-storm water discharges (Section B(3)). Section B(4)(c) requires visual observation records to note, among other things, the date of each monthly observation. Section B(5) requires facility operators to sample and analyze at least two storm water discharges from all storm water discharge locations during each wet season. Section B(7) requires that the visual observations and samples must represent the "quality and quantity of the facility's storm water discharges from the storm event." WSCD failed to sample and analyze at least two storm water discharges from all storm water discharge locations as required by Section B(5) of the General Permit when it only took one sample from discharge location SD5 during the 2007-2008 rainy season and one from its third discharge location¹ during the 2006-2007 rainy season. These violations are ongoing. Consistent with the five-year statute of limitations applicable to citizen

¹ During the 2006-2007 rainy season, WSCD sampled discharge locations SD1 and SD4 on 11/13/2006, and locations MP1, MP2, and MP4 on 2/26/2007. Though it is not clear how WSCD would identify the third discharge location that is missing from the 11/13/2006 sample, it is clear that three discharge locations should have been sampled even though only two were actually sampled.

enforcement actions brought pursuant to the federal Clean Water Act, WSCD is subject to penalties for violations of the General Permit and the Act since June 4, 2005.

One of the objectives of Section B of the General Permit is to “[e]nsure that storm water discharges are in compliance with the Discharge Prohibitions, Effluent Limitations, and Receiving Water Limitations specified in this General Permit.” (Section B(2)(a)). In order to meet that and other objectives, the General Permit requires analysis of storm water samples for parameters “dependent on the facility’s standard industrial classification (SIC) code.” (Section B(5)(c)(iii)). Facility operators must identify “the analytical methods and corresponding method detection limits used to detect pollutants in storm water discharges. This shall include justification that the method detection limits are adequate to satisfy the objectives of the monitoring program.” (Section B(10)(a)(iii)). WSCD, with SIC codes 5093 and 5015, is required to sample for, among other things, copper. (Table D, p. 43). As detailed above, water quality standards for copper are set at 0.013 mg/L (CMC) and 0.009 mg/L (CCC), and the benchmark level is 0.0636 mg/L. However, in many of WSCD’s samples, the threshold level for detecting copper was set at 0.1 mg/L, a number that exceeds all of the water quality standards and the benchmark. As a result, WSCD’s water samples could contain excess amounts of copper but fail to be detected in the analysis because the amount did not reach the sampling threshold. Samples analyzed by WSCD for copper did not reach the 0.1 mg/L threshold on the following dates:

Date	Location
1/25/2010	SD1
1/25/2010	SD4
1/25/2010	SD5
1/21/2010	SD4
1/21/2010	SD5
1/18/2010	SD1
1/18/2010	SD5
11/20/2009	SD1
11/20/2009	SD5
1/4/2008	SD1
10/12/2007	US1
11/13/2006	SD4
2/27/2006	MP1
2/27/2006	MP2
2/27/2006	MP3
2/27/2006	SD1
1/30/2006	MP1
1/30/2006	MP3
1/30/2006	SD1
1/3/2006	MP1

James Ratto, James Salyers, Rick Holiday
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Each of the above listed failures to properly analyze water samples for copper is a violation of General Permit Section B(10)(a)(iii). These violations are ongoing. Consistent with the five-year statute of limitations applicable to citizen enforcement actions brought pursuant to the federal Clean Water Act, WSCD is subject to penalties for violations of the General Permit and the Act since June 4, 2005.

The above referenced data was obtained from the Facility's monitoring program as reported in its Annual Reports submitted to the Regional Board. This data is evidence that the Facility has violated various Discharge Prohibitions, Receiving Water Limitations, and Effluent Limitations in the General Permit. To the extent the storm water data collected by WSCD is not representative of the quality of the Facility's various storm water discharges, and/or WSCD failed to sample for "[t]oxic chemicals and other pollutants that are likely to be present in storm water discharges in significant quantities" (Section B(5)(c)(ii)), CSPA and PRC, on information and belief, allege that the Facility's monitoring program violates Sections B(3), (4), (5) and (7) of the General Permit. Consistent with the five-year statute of limitations applicable to citizen enforcement actions brought pursuant to the federal Clean Water Act, WSCD is subject to penalties for violations of the General Permit and the Act's monitoring and sampling requirements since June 4, 2005.

E. Failure to File True and Correct Annual Reports.

Section B(14) of the General Industrial Storm Water Permit requires dischargers to submit an Annual Report by July 1st of each year to the executive officer of the relevant Regional Board. The Annual Report must be signed and certified by an appropriate corporate officer. General Permit, Sections B(14), C(9) & (10). Section A(9)(d) of the General Industrial Storm Water Permit requires the discharger to include in their annual report an evaluation of their storm water controls, including certifying compliance with the General Industrial Storm Water Permit. *See also* General Permit, Sections C(9) & (10) and B(14).

In addition, since 2005, WSCD and its agents, Rick Holiday and James R. Salyers², inaccurately certified in their Annual Reports that the Facility was in compliance with the General Permit. Consequently, WSCD has violated Sections A(9)(d), B(14) and C(9) & (10) of the General Industrial Storm Water Permit every time WSCD failed to submit a complete or correct report and every time WSCD or its agents falsely purported to comply with the Act. WSCD is subject to penalties for violations of Section (C) of the General Industrial Storm Water Permit and the Act occurring since June 4, 2005.

² Rick Holiday, Operations Manager, certified the 2008-2009 Annual Report; James R. Salyers, Vice-President, certified the Annual Reports for 2006-2007, and 2007-2008.

IV. Persons Responsible for the Violations.

CSPA and PRC put WSCD, James Ratto, James Salyers, and Rick Holiday on notice that they are the persons responsible for the violations described above. If additional persons are subsequently identified as also being responsible for the violations set forth above, CSPA and PRC put WSCD, James Ratto, James Salyers, and Rick Holiday on notice that they intend to include those persons in this action.

V. Name and Address of Noticing Parties.

The names, addresses and telephone numbers of CSPA and PRC are as follows:

Bill Jennings, Executive Director
California Sportfishing Protection Alliance
3536 Rainier Avenue,
Stockton, CA 95204
Tel. (209) 464-5067
Fax (209) 464-1028

David Keller
Petaluma River Council
1327 I Street
Petaluma, CA 94952
Tel. (707) 763-9336

VI. Counsel.

CSPA and PRC have retained our office to represent them in this matter. Please direct all communications to:

Michael R. Lozeau
Richard T. Drury
David A. Zizmor
Lozeau Drury LLP
1516 Oak Street, Suite 216
Alameda, California 94501
Tel. (510) 749-9102
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VII. Penalties.

Pursuant to Section 309(d) of the Act (33 U.S.C. § 1319(d)) and the Adjustment of Civil Monetary Penalties for Inflation (40 C.F.R. § 19.4; 73 FR 75340) each separate violation of the Act subjects WSCD to a penalty of up to \$37,500 per day per violation for all violations occurring during the period commencing five years prior to the date of this Notice of Violations and Intent to File Suit. In addition to civil penalties, CSPA and PRC will seek injunctive relief preventing further violations of the Act pursuant to Sections 505(a) and (d) (33 U.S.C. §1365(a)

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and (d)) and such other relief as permitted by law. Lastly, Section 505(d) of the Act (33 U.S.C. § 1365(d)), permits prevailing parties to recover costs and fees, including attorneys' fees.

CSPA and PRC believe this Notice of Violations and Intent to File Suit sufficiently states grounds for filing suit. CSPA and PRC intend to file a citizen suit under Section 505(a) of the Act against WSCD and its agents for the above-referenced violations upon the expiration of the 60-day notice period. However, during the 60-day notice period, CSPA and PRC would be willing to discuss effective remedies for the violations noted in this letter. If you wish to pursue such discussions in the absence of litigation, CSPA and PRC suggest that you initiate those discussions within the next 20 days so that they may be completed before the end of the 60-day notice period. CSPA and PRC do not intend to delay the filing of a complaint in federal court if discussions are continuing when that period ends.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael R. Lozeau". The signature is fluid and cursive, with a large, stylized initial "M" and "L".

Michael R. Lozeau
Attorney for California Sportfishing Protection
Alliance and Petaluma River Council

SERVICE LIST

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Lisa Jackson, Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

Dorothy R. Rice, Executive Director
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Sacramento, CA 95812-0100

Eric Holder, U.S. Attorney General
U.S. Department of Justice
950 Pennsylvania Avenue, N.W.
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Jared Blumenfeld, Regional Administrator
U.S. EPA – Region 9
75 Hawthorne Street
San Francisco, CA, 94105

Catherine Kuhlman, Executive Officer
North Coast Regional Water Quality Control Board
5550 Skylane Boulevard, Suite A
Santa Rosa, CA 95403

ATTACHMENT A

Rain Dates, West Sonoma County Disposal Services, Inc., Santa Rosa, California

June 8, 2005	January 26, 2006	April 9, 2006
June 9, 2005	January 27, 2006	April 10, 2006
June 16, 2005	January 28, 2006	April 11, 2006
June 17, 2005	January 29, 2006	April 12, 2006
June 18, 2005	January 30, 2006	April 13, 2006
August 20, 2005	February 1, 2006	April 14, 2006
October 15, 2005	February 2, 2006	April 15, 2006
October 25, 2005	February 4, 2006	April 16, 2006
October 26, 2005	February 17, 2006	April 17, 2006
October 28, 2005	February 18, 2006	May 19, 2006
October 29, 2005	February 26, 2006	May 20, 2006
November 4, 2005	February 27, 2006	May 21, 2006
November 6, 2005	February 28, 2006	May 22, 2006
November 7, 2005	March 1, 2006	May 23, 2006
November 8, 2005	March 2, 2006	May 24, 2006
November 9, 2005	March 3, 2006	June 12, 2006
November 25, 2005	March 4, 2006	June 15, 2006
November 28, 2005	March 5, 2006	July 29, 2006
November 29, 2005	March 6, 2006	October 5, 2006
December 1, 2005	March 7, 2006	October 16, 2006
December 2, 2005	March 10, 2006	November 2, 2006
December 7, 2005	March 11, 2006	November 3, 2006
December 17, 2005	March 12, 2006	November 8, 2006
December 18, 2005	March 13, 2006	November 11, 2006
December 19, 2005	March 14, 2006	November 13, 2006
December 20, 2005	March 15, 2006	November 14, 2006
December 21, 2005	March 16, 2006	November 16, 2006
December 22, 2005	March 17, 2006	November 17, 2006
December 23, 2005	March 18, 2006	November 22, 2006
December 25, 2005	March 20, 2006	November 23, 2006
December 26, 2005	March 24, 2006	November 26, 2006
December 27, 2005	March 25, 2006	November 27, 2006
December 28, 2005	March 26, 2006	December 9, 2006
December 30, 2005	March 27, 2006	December 10, 2006
December 31, 2005	March 28, 2006	December 11, 2006
January 1, 2006	March 29, 2006	December 12, 2006
January 2, 2006	March 30, 2006	December 13, 2006
January 3, 2006	March 31, 2006	December 14, 2006
January 4, 2006	April 1, 2006	December 15, 2006
January 7, 2006	April 2, 2006	December 21, 2006
January 11, 2006	April 3, 2006	December 22, 2006
January 14, 2006	April 4, 2006	December 26, 2006
January 18, 2006	April 5, 2006	December 27, 2006
January 19, 2006	April 7, 2006	January 4, 2007
January 21, 2006	April 8, 2006	January 17, 2007

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Rain Dates, West Sonoma County Disposal Services, Inc., Santa Rosa, California

January 26, 2007	November 19, 2007	March 15, 2008
January 27, 2007	December 2, 2007	March 29, 2008
February 7, 2007	December 4, 2007	April 23, 2008
February 8, 2007	December 5, 2007	May 24, 2008
February 9, 2007	December 6, 2007	September 19, 2008
February 10, 2007	December 7, 2007	September 20, 2008
February 11, 2007	December 17, 2007	October 4, 2008
February 12, 2007	December 18, 2007	October 31, 2008
February 21, 2007	December 20, 2007	November 1, 2008
February 22, 2007	December 28, 2007	November 2, 2008
February 23, 2007	December 29, 2007	November 3, 2008
February 24, 2007	December 30, 2007	November 4, 2008
February 25, 2007	January 3, 2008	November 8, 2008
February 26, 2007	January 4, 2008	November 9, 2008
February 27, 2007	January 5, 2008	November 20, 2008
February 28, 2007	January 6, 2008	November 25, 2008
March 1, 2007	January 7, 2008	November 26, 2008
March 2, 2007	January 8, 2008	December 14, 2008
March 7, 2007	January 10, 2008	December 15, 2008
March 26, 2007	January 11, 2008	December 16, 2008
April 7, 2007	January 12, 2008	December 18, 2008
April 11, 2007	January 21, 2008	December 19, 2008
April 12, 2007	January 22, 2008	December 21, 2008
April 14, 2007	January 23, 2008	December 22, 2008
April 20, 2007	January 24, 2008	December 24, 2008
April 21, 2007	January 25, 2008	December 25, 2008
April 22, 2007	January 26, 2008	December 27, 2008
May 2, 2007	January 27, 2008	December 28, 2008
May 4, 2007	January 28, 2008	December 29, 2008
July 11, 2007	January 29, 2008	January 2, 2009
July 18, 2007	January 30, 2008	January 5, 2009
September 22, 2007	January 31, 2008	January 8, 2009
October 1, 2007	February 1, 2008	January 21, 2009
October 6, 2007	February 2, 2008	January 22, 2009
October 10, 2007	February 3, 2008	January 23, 2009
October 12, 2007	February 19, 2008	January 24, 2009
October 15, 2007	February 20, 2008	January 25, 2009
October 16, 2007	February 21, 2008	February 5, 2009
October 17, 2007	February 22, 2008	February 6, 2009
October 19, 2007	February 23, 2008	February 7, 2009
October 20, 2007	February 24, 2008	February 8, 2009
November 10, 2007	March 13, 2008	February 9, 2009
November 11, 2007	March 14, 2008	February 11, 2009

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Rain Dates, West Sonoma County Disposal Services, Inc., Santa Rosa, California

February 13, 2009	December 2, 2009	February 16, 2010
February 14, 2009	December 6, 2009	February 17, 2010
February 15, 2009	December 7, 2009	February 23, 2010
February 16, 2009	December 10, 2009	February 24, 2010
February 17, 2009	December 11, 2009	February 25, 2010
February 18, 2009	December 12, 2009	February 26, 2010
February 22, 2009	December 13, 2009	February 27, 2010
February 23, 2009	December 15, 2009	March 2, 2010
February 24, 2009	December 16, 2009	March 3, 2010
February 25, 2009	December 17, 2009	March 4, 2010
February 26, 2009	December 20, 2009	March 8, 2010
March 1, 2009	December 21, 2009	March 9, 2010
March 2, 2009	December 26, 2009	March 12, 2010
March 3, 2009	December 27, 2009	March 24, 2010
March 4, 2009	December 29, 2009	March 25, 2010
March 5, 2009	January 1, 2010	March 29, 2010
March 15, 2009	January 3, 2010	March 30, 2010
March 16, 2009	January 11, 2010	March 31, 2010
March 21, 2009	January 12, 2010	April 2, 2010
March 22, 2009	January 13, 2010	April 4, 2010
April 7, 2009	January 14, 2010	April 5, 2010
April 8, 2009	January 16, 2010	April 8, 2010
April 9, 2009	January 17, 2010	April 11, 2010
May 1, 2009	January 18, 2010	April 12, 2010
May 2, 2009	January 19, 2010	April 19, 2010
May 3, 2009	January 20, 2010	April 20, 2010
May 4, 2009	January 21, 2010	April 26, 2010
May 5, 2009	January 22, 2010	April 27, 2010
May 6, 2009	January 23, 2010	April 28, 2010
June 3, 2009	January 24, 2010	May 9, 2010
June 5, 2009	January 25, 2010	May 10, 2010
September 12, 2009	January 28, 2010	May 17, 2010
September 13, 2009	January 29, 2010	May 19, 2010
September 14, 2009	February 3, 2010	May 20, 2010
October 13, 2009	February 4, 2010	May 25, 2010
October 14, 2009	February 5, 2010	May 27, 2010
October 15, 2009	February 6, 2010	May 29, 2010
October 19, 2009	February 8, 2010	
November 5, 2009	February 9, 2010	
November 6, 2009	February 11, 2010	
November 18, 2009	February 12, 2010	
November 20, 2009	February 13, 2010	
November 22, 2009	February 15, 2010	