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November 21, 2019

VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Matt Morey, President and Legally
Responsible Person
Calstone Co.
1155 Aster Ave.
Sunnyvale, CA 94086

Michael Murray
Calstone Co.
426 E. Grant Line Road
Tracy, CA 95376

VIA FIRST CLASS MAIL

Matt Morey
(Registered Agent for Service of Process for
Calstone Co.)
1155 Aster Ave.
Sunnyvale, CA 94086

Re: Notice of Violations and Intent to File Suit under the Federal Water Pollution Control Act

Dear Messrs. Morey and Murray:

I am writing on behalf of California Sportfishing Protection Alliance ("CSPA") in regard to violations of the Clean Water Act (the "Act") that CSPA believes are occurring at your industrial facility located at 426 E. Grant Line Road in Tracy, California ("Facility"), as well as your construction site located at the same address ("Site"). CSPA is a non-profit public benefit corporation dedicated to the preservation, protection, and defense of the environment, wildlife, and natural resources of the Sacramento River, San Joaquin River, the Sacramento-San Joaquin Delta and other California waters. This letter is being sent to Calstone Company, Matt Morey, and Michael Murray as the responsible owners or operators of the Facility and Site (all recipients are hereinafter collectively referred to as "Calstone").

This letter addresses Calstone's unlawful discharge of pollutants from the Facility and Site to the City of Tracy's municipal storm drain system, which then flow to the Middle River, then the Old River and on into the Delta and Suisun Bay. 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. 97-03-DWQ ("1997 Permit") as renewed by Order No. 2015-0057-DWQ ("2015 Permit"). The 1997 Permit was in

effect between 1997 and June 30, 2015, and the 2015 Permit went into effect on July 1, 2015. As explained below, the 2015 Permit maintains or makes more stringent the same requirements as the 1997 Permit. As appropriate, CSPA refers to the 1997 and 2015 Permits in this letter collectively as the "General Permit." The Site is discharging storm water pursuant to NPDES Permit No. CAS000002, State Board Order No. 2009-0009-DWQ as amended by Order No. 2010-0014-DWQ and Order No. 2012-0006-DWQ ("General Construction Permit"). This letter notifies Calstone of ongoing violations of the substantive and procedural requirements of the General Permit at the Facility and the General Construction Permit at the Site.

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 and Site. Consequently, CSPA hereby places Calstone on formal notice that, after the expiration of sixty days from the date of this Notice of Violations and Intent to Sue, CSPA intends to file suit in federal court against Calstone under Section 505(a) of the Clean Water Act (33 U.S.C. § 1365(a)), for violations of the Clean Water Act, the General Permit, and the General Construction Permit. These violations are described more extensively below.

I. Background.

A. The Facility.

On May 13, 2015, Calstone filed its Notice of Intent to Comply with the Terms of the General Permit to Discharge Storm Water Associated with Industrial Activity ("NOI"). The Waste Discharger Identification Number ("WDID") for the Facility listed on documents submitted to the State Board is 5S39I021376. In the NOI, Calstone certifies that the Facility is classified under SIC code 3271 ("Concrete Block and Brick"). The Facility collects and discharges storm water from its 15.5 acre industrial site into at least thirteen drain inlets connected to one storm water discharge location at the Facility. The Facility discharges stormwater to a municipal storm drain system operated by the City of Tracy, which conveys the Facility's storm water discharges to the Old River, Middle River, the Delta and Suisun Bay. CSPA is informed and believes that the Facility has been in operation under the current ownership since at least 2010. During that entire period, the Facility has been subject to the Clean Water Act's stormwater control requirements.

B. The Construction Site.

On August 3, 2018, Calstone filed a Notice of Intent to Comply with the General Permit to Discharge Storm Water Associated with Construction Activity ("Construction NOI"). The WDID for the Facility listed on documents submitted to the State Board is 5S39C384425. In the Construction NOI, Calstone certifies that the construction start date is September 1, 2018 and the

end date is September 16, 2020. The total size of the construction area is 2.66 acres, with a total area of 2.66 acres to be disturbed. On information and belief, the Site discharges storm water through at least two outfall locations, located in the northwest corner of the Site and the western bioswale at Storage Lot 1. The discharge goes to the City of Tracy's municipal storm drain system, which then flows to the Middle River, then the Old River and on into the Delta and Suisun Bay.

The Site's current Construction NOI and Storm Water Pollution Prevention Plan ("SWPPP") indicates that the Site's risk level is at a Risk Level 1.

C. Water Quality Standards, Guidelines, and Numeric Action Levels.

The Regional Board has identified beneficial uses of the Central Valley Region's waters and established water quality standards for the Sacramento-San Joaquin Delta, in "The Water Quality Control Plan (Basin Plan) for the California Regional Water Quality Control Board, Central Valley Region – The Sacramento River Basin and The San Joaquin River Basin," generally referred to as the Basin Plan. *See* https://www.waterboards.ca.gov/centralvalley/water_issues/basin_plans/sacsjr_201805.pdf.

The beneficial uses of these waters include, among others, domestic and municipal supply, water contact recreation, non-contact recreation, wildlife habitat, warm and cold freshwater habitat, and fish spawning. The non-contact water recreation use is defined as "[u]ses of water for recreational activities involving proximity to water, but where there is generally no body contact with water, nor any likelihood of ingestion of water. These uses include, but are not limited to, picnicking, sunbathing, hiking, camping, boating, . . . hunting, sightseeing, or aesthetic enjoyment in conjunction with the above activities." Basin Plan at 2-2. Contact recreation includes "swimming, wading, water-skiing, skin and scuba diving, surfing, white water activities, fishing, or use of natural hot springs." *Id.* Visible pollution, including cloudy or muddy water from industrial areas, impairs people's use of the Old River, Middle River, and the Delta for contact and non-contact water recreation.

The Basin Plan establishes water quality standards for the Sacramento-San Joaquin River Delta. It includes a narrative toxicity standard which states that "[a]ll waters shall be maintained free of toxic substances in concentrations that produce detrimental physiological responses in human, plant, animal, or aquatic life." *Id.* at 3-15. It provides that "[w]ater shall not contain floating material in amounts that cause nuisance or adversely affect beneficial uses." *Id.* at 3-7. It provides that "[w]ater shall be free of discoloration that causes nuisance or adversely affects beneficial uses." *Id.* at 3-6. It provides that "[w]aters shall not contain suspended material in concentrations that cause nuisance or adversely affect beneficial uses." *Id.* at 3-13. The Basin Plan requires that "[w]aters shall be free of changes in turbidity that cause nuisance or adversely affect beneficial uses." *Id.* at 3-15. The Basin Plan also prohibits the discharges of oil and grease, stating that "[w]aters shall not contain oils, greases, waxes, or other materials in concentrations that cause nuisance, result in a visible film or coating on the surface of the water or on objects in the water, or otherwise adversely affect beneficial uses." *Id.* at 3-8. The Basin Plan provides that the pH shall not be depressed below 6.5 nor raised above 8.5. *Id.*

Table 3-1 of the Basin Plan establishes a water quality objective ("WQO") for iron of 0.3 mg/L and for zinc of 0.1 mg/L. The California Toxics Rule (California Enclosed Bays & Estuaries) sets a freshwater numeric water quality standard for zinc of 0.12 mg/L (Criteria Maximum Concentration – "CMC") at a hardness of 100 mg/L $CaCO_3$.

The Basin Plain provides that "[a]t a minimum, water designated for use as domestic or municipal supply (MUN) shall not contain concentrations of chemical constituents in excess of the maximum contaminant levels (MCLs) specified in the following provisions of Title 22 of the California Code of Regulations, which are incorporated by reference into this plan: Tables 64431-A (Inorganic Chemicals) and 64431-B (Fluoride) of Section 64431, Table 64444-A (Organic Chemicals) of Section 64444, and Tables 64449-A (Secondary Maximum Contaminant Levels-Consumer Acceptance Limits) and 64449-B (Secondary Maximum Contaminant Levels-Ranges) of Section 64449." *Id.* at 3-16. Table 64449-A provides Secondary MCL ("SMCL") for iron of 0.3 mg/L.

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").[1] The following benchmarks have been established for pollutants discharged by Calstone: total suspended solids ("TSS") – 100 mg/L and iron – 1.0 mg/L. EPA also has established a benchmark for zinc of 0.26 mg/L.

These benchmarks are reflected in the 2015 Permit in the form of Numeric Action Levels ("NALs"). The 2015 Permit incorporates annual NALs, which reflect the EPA Multi-Sector General Permit benchmark values, and instantaneous maximum NALs, which are derived from a Water Board dataset. The following annual NALs have been established under the 2015 Permit for pollutants discharged by Calstone: TSS – 100 mg/L; oil & grease ("O&G") – 15 mg/L; iron – 1.0 mg/L; lead – 0.262 mg/L; cadmium – 0.0053 mg/L; nickel – 1.02 mg/L; copper – 0.0332 mg/L; and zinc — 0.26 mg/L. The 2015 Permit also establishes the following instantaneous maximum NALs: pH – 6.0-9.0 s.u.; TSS – 400 mg/L; and O&G – 25 mg/L.

The State of California maintains a list of impaired waterways pursuant to Section 303(d) of the Clean Water Act, 33 U.S.C. § 1313(d). Old River and Middle River are included on the impaired waters list. Old River is identified as impaired by chlorpyrifos, electrical conductivity, low dissolved oxygen, and total dissolved solids. Middle River is identified as impaired by low dissolved oxygen. Discharges of pollutants in storm water from the Facility include pollutants that contribute to some of these impairments, including electrical conductivity, low dissolved oxygen, and total dissolved solids.

[1] The Benchmark Values can be found at: https://www.epa.gov/sites/production/files/2015-10/documents/msgp2015_finalpermit.pdf.

II. Alleged Violations of the NPDES General Permit.

A. Discharges in Violation of the General Permit.

Calstone has violated and continues to violate the terms and conditions of the General 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 1997 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. The 2015 Permit includes the same effluent limitation. *See* 2015 Permit, Effluent Limitation V(A). BAT and BCT include both nonstructural and structural measures. 1997 Permit, Section A(8); 2015 Permit, Section X(H). Conventional pollutants are TSS, O&G, pH, biochemical oxygen demand, 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 1997 Permit and Discharge Prohibition III(B) of the 2015 Permit prohibit 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 1997 Permit and Discharge Prohibition III(C) of the 2015 Permit prohibit 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 1997 Permit and Receiving Water Limitation VI(B) of the 2015 Permit prohibit storm water discharges and authorized non-storm water discharges that adversely impact human health or the environment. Receiving Water Limitation C(2) of the 1997 Permit and Receiving Water Limitation VI(A) and Discharge Prohibition III(D) of the 2015 Permit also prohibit storm water discharges and authorized non-storm water discharges that cause or contribute to an exceedance of any applicable water quality standards. The General Permit does not authorize the application of any mixing zones for complying with Receiving Water Limitation C(2) of the 1997 Permit and Receiving Water Limitation VI(A) of the 2015 Permit. As a result, compliance with this provision is measured at the Facility's discharge monitoring locations.

Calstone has discharged and continues to discharge storm water with unacceptable levels of TSS and iron in violation of the General Permit. Calstone'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 General 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 observations and measurements of pollutants in excess of applicable numerical and narrative water quality standards established in the Basin Plan. They have thus violated Discharge Prohibitions A(2) and

Receiving Water Limitations C(1) and C(2) of the 1997 Permit; Discharge Prohibitions III(C) and III(D) and Receiving Water Limitations VI(A), VI(B), and VI(C) of the 2015 Permit; and are evidence of ongoing violations of Effluent Limitation B(3) of the 1997 Permit, and Effluent Limitation V(A) of the 2015 Permit.

Sampling / Observation Date	Parameter	Observed Concentration	Basin Plan Water Quality Objective / CTR	Outfall (as identified by Facility)
02/08/2019	Iron	14 mg/L	0.3 mg/L (WQO) / 0.3 mg/L (SMCL)	Outfall 1
01/16/2019	Iron	23.5 mg/L	0.3 mg/L (WQO) / 0.3 mg/L (SMCL)	Outfall 1
12/17/2018	Iron	1.47 mg/L	0.3 mg/L (WQO) / 0.3 mg/L (SMCL)	Outfall 1
11/29/2018	Iron	4.5 mg/L	0.3 mg/L (WQO) / 0.3 mg/L (SMCL)	Outfall 1
11/16/2017	Iron	0.865 mg/L	0.3 mg/L (WQO) / 0.3 mg/L (SMCL)	Outfall 1
12/23/2016	Iron	0.625 mg/L	0.3 mg/L (WQO) / 0.3 mg/L (SMCL)	Outfall 1
12/15/2016	Iron	0.304 mg/L	0.3 mg/L (WQO) / 0.3 mg/L (SMCL)	Outfall 1
01/04/2016	Iron	1.45 mg/L	0.3 mg/L (WQO) / 0.3 mg/L (SMCL)	Outfall 1
01/16/2019	pH	9.9 s.u.	6.5 – 8.5 s.u.(WQO)	Outfall 1
12/17/2018	pH	9.0 s.u.	6.5 – 8.5 s.u. (WQO)	Outfall 1
11/29/2018	pH	9.0 s.u.	6.5 – 8.5 s.u. (WQO)	Outfall 1
02/08/2019	Zinc	0.119 mg/L	0.1 mg/L (WQO)	Outfall 1
01/16/2019	Zinc	0.172 mg/L	0.1 mg/L (WQO) / 0.120 mg/L (CTR)	Outfall 1
11/29/2018	Zinc	0.175 mg/L	0.1 mg/L (WQO) / 0.120 mg/L (CTR)	Outfall 1
02/26/2018	Zinc	0.439 mg/L	0.1 mg/L (WQO) / 0.120 mg/L (CTR)	Outfall 1
11/16/2017	Zinc	1.32 mg/L	0.1 mg/L (WQO) / 0.120 mg/L (CTR)	Outfall 1
12/23/2016	Zinc	0.228 mg/L	0.1 mg/L (WQO) / 0.120 mg/L (CTR)	Outfall 1
12/15/2016	Zinc	0.632 mg/L	0.1 mg/L (WQO) / 0.120 mg/L (CTR)	Outfall 1
01/04/2016	Zinc	0.308 mg/L	0.1 mg/L (WQO) / 0.120 mg/L (CTR)	Outfall 1

The information in the above table reflects data gathered from Calstone' self-monitoring during the 2015-2016, 2016-2017, 2017-2018, and 2018-2019 reporting years. CSPA alleges that since at least November 21, 2014 and continuing through the date of this notice, Calstone 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:

- Iron – 0.3 mg/L (WQO and SMCL)
- pH – 6.5–8.5 s.u. (WQO)
- Zinc – 0.1 mg/L (WQO)

The following discharges of pollutants from the Facility have contained measurements of pollutants in excess of applicable NALs and EPA benchmarks. 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) of the 1997 Permit; Discharge Prohibitions III(B) and III(C) and Receiving Water Limitations VI(A) and VI(B) of the 2015 Permit; and are evidence of ongoing violations of Effluent Limitation B(3) of the 1997 Permit and Effluent Limitation V(A) of the 2015 Permit.

Sampling / Observation Date	**Parameter**	**Observed Concentration / Conditions**	**EPA Benchmark Value / Annual NAL**	**Outfall (as identified by the Facility)**
02/08/2019	Iron	14.0 mg/L		Outfall 1
01/16/2019	Iron	23.5 mg/L		Outfall 1
12/17/2018	Iron	1.47 mg/L		Outfall 1
11/29/2018	Iron	4.5 mg/L		Outfall 1
2018-2019 Annual Average:	Iron	10.87 mg/L	1.0 mg/L	Outfall 1
01/04/2016	Iron	1.45 mg/L		Outfall 1
2015-2016 Annual Average:	Iron	1.45 mg/L	1.0 mg/L	Outfall 1
01/16/2019	pH	9.9 s.u.	9.0 s.u.	Outfall 1
12/17/2018	pH	9.0 s.u.	9.0 s.u.	Outfall 1
11/29/2018	pH	9.0 s.u.	9.0 s.u.	Outfall 1
2018-2019 Annual Average:	pH	9.1 s.u.	9.0 s.u.	Outfall 1
02/08/2019	TSS	319 mg/L		Outfall 1
01/16/2019	TSS	604 mg/L		Outfall 1
12/17/2018	TSS	112 mg/L		Outfall 1
11/29/2018	TSS	137 mg/L		Outfall 1

2018-2019 Annual Average:	TSS	293 mg/L	100 mg/L	Outfall 1
02/26/2018	Zinc	0.439 mg/L		Outfall 1
11/16/2017	Zinc	1.32 mg/L		Outfall 1
2017-2018 Annual Average:	Zinc	0.88 mg/L	0.26 mg/L	Outfall 1
12/15/2016	Zinc	0.632 mg/L		Outfall 1
2016-2017 Annual Average:	Zinc	0.43 mg/L	0.26 mg/L	Outfall 1
01/04/2016	Zinc	0.308 mg/L		Outfall 1
2015-2016 Annual Average:	Zinc	0.308 mg/L	0.26 mg/L	Outfall 1

The information in the above table reflects data gathered from Calstone' self-monitoring during the 2015-2016, 2016-2017, 2017-2018, and 2018-2019 reporting years. CSPA notes that Calstone's sampling results from the 2015-2016 reporting year placed the Facility in Level 1 Status for zinc and iron pursuant to the General Permit. The additional NAL exceedances in 2016-2017 placed the Facility in Level 2 Status for zinc. The NAL exceedances for TSS in 2018-2019 have placed the Facility into Level 1 status for TSS. Although the Facility returned to baseline status for iron at the conclusion of the 2017-2018 reporting year, the exceedances of the iron NAL in 2018-2019 have placed the Facility in Level 1 status for iron once again. CSPA alleges that since at least November 21, 2014 Calstone has discharged storm water contaminated with pollutants at levels that exceed the applicable NALs and related EPA benchmarks for iron, TSS, and zinc.

CSPA's investigation, including its review of Calstone's SWPPP, Calstone's Level 1 and Level 2 ERA Reports, Calstone's analytical results documenting pollutant levels in the Facility's storm water discharges well in excess of applicable water quality standards, and NALs and EPA benchmark values indicates that Calstone has not implemented BAT and BCT at the Facility for its discharges of TSS, iron, copper, and zinc, and potentially other pollutants, in violation of Effluent Limitation B(3) of the 1997 Permit and Effluent Limitation V(A) of the 2015 Permit. Calstone was required to have implemented BAT and BCT by no later than October 1, 1992, or since the date the Facility opened. Thus, Calstone is discharging polluted storm water associated with its industrial operations without having implemented BAT and BCT.

In addition, the numbers listed above 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 1997 Permit; Discharge Prohibitions III(C) and III(D) and Receiving Water Limitations VI(A), VI(B), and VI(C) of the 2015 Permit. CSPA alleges that such violations also have occurred and will occur on other rain dates, including on information and belief every significant rain event that has occurred since November 21, 2014 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 alleges that Calstone has discharged storm water containing impermissible and unauthorized levels of TSS, iron, and/or zinc in violation of Section 301(a) of the Act as well as Effluent Limitation B(3), Discharge Prohibitions A(1) and A(2), and Receiving Water Limitations C(1) and C(2) of the 1997 Permit; and Effluent Limitation V(A), Discharge Prohibitions III(B) and III(C) and Receiving Water Limitations VI(A) and VI(B) of the 2015 Permit.[2]

Further, CSPA puts Calstone on notice that 2015 Permit Effluent Limitation V(A) is a separate, independent requirement with which Calstone must comply, and that carrying out the iterative process triggered by exceedances of the NALs listed at Table 2 of the 2015 Permit does not amount to compliance with the Permit's Effluent Limitations, including Calstone's obligation to have installed BAT and BCT at the Facility. While exceedances of the NALs demonstrate that a facility is among the worst performing facilities in the State and is evidence relevant to determining that BAT and BCT have not been implemented at the Facility, the NALs are not by themselves technology based criteria that alone determine whether an industrial facility has implemented BMPs that achieve BAT/BCT.[3] Thus, even if a facility is discharging pollutants below the NALs, the facility may not have implemented BAT and BCT. Finally, even if Calstone submits an Exceedance Response Action Plan(s) pursuant to Section XII of the 2015 Permit, the violations of Effluent Limitation V(A) described in this Notice Letter are ongoing.

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 Permit and the Act. Each discharge of storm water constitutes an unauthorized discharge of TSS, iron, copper, and/or zinc, and storm water associated with industrial activity in violation of Section 301(a) of the CWA. Each day that the Facility operates without implementing BAT/BCT is a violation 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, Calstone is subject to penalties for violations of the General Permit and the Act since November 21, 2014.

B. Failure to Conduct Sampling and Analysis.

The 1997 Permit requires facility operators to develop and implement an adequate Monitoring and Reporting Program before industrial activities begin at a facility. *See* 1997 Permit, § B(1). The 2015 Permit includes similar monitoring and reporting requirements. *See* 2015 Permit, § XI. The primary objective of the Monitoring and Reporting Program is to both

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[2] The rain dates on the attached table are all the days when 0.1 inches or more of rain was measured at a weather station in close proximity to the Facility or samples were taken of stormwater discharging from the Facility. The data was accessed via https://www.ncdc.noaa.gov/cdo-web/ (Last accessed on September 26, 2019).

[3] The NALs are not intended to serve as technology-based or water quality-based numeric effluent limitations. The NALs are not derived directly from either BAT/BCT requirements or receiving water objectives. NAL exceedances defined in [the 2015] Permit are not, in and of themselves, violations of [the 2015] Permit." 2015 Permit, Finding 63, p. 11. The NALs do, however, trigger reporting requirements. *See* 2015 Permit, Section XII.

observe and to detect and measure the concentrations of pollutants in a facility's discharge to ensure compliance with the General Permit's discharge prohibitions, effluent limitations, and receiving water limitations. An adequate Monitoring and Reporting Program therefore ensures that BMPs are effectively reducing and/or eliminating pollutants at a facility, and is evaluated and revised whenever appropriate to ensure compliance with the General Permit.

Sections B(3)-(16) of the 1997 Permit set forth the monitoring and reporting requirements. As part of the Monitoring Program, all facility operators must conduct visual observations of storm water discharges and authorized non-storm water discharges, and collect and analyze samples of storm water discharges. As part of the Reporting Program, all facility operators must timely submit an Annual Report for each reporting year. The monitoring and reporting requirements of the 2015 Permit are substantially similar to those in the 1997 Permit, and in several instances more stringent.

The 1997 Permit requires dischargers to collect storm water samples during the first hour of discharge from the first storm event of the wet season, and at least one other storm event during the wet season, from all storm water discharge locations at a facility. *See* 1997 Permit, § B(5). A sample must be collected from each discharge point at the facility, and in the event that an operator fails to collect samples from the first storm event, the operators must still collect samples from two other storm events and "shall explain in the Annual Report why the first storm event was not sampled." *See* 1997 Permit, § B(5)(a). The 2015 Permit now mandates that facility operators sample *four* (rather than two) storm water discharges from all discharge locations over the course of the reporting year. *See* 2015 Permit, §§ XI(B)(2), (3). Storm water discharges trigger the sampling requirement under the 1997 Permit when they occur during facility operating hours and are preceded by at least three working days without storm water discharge. *See* 1997 Permit, § B(5)(b). The 2015 Permit shortens the preceding no discharge period to 48 hours. *See* 2015 Permit, § XI(B)(1). Samples must be collected from each drainage area at all discharge locations and be representative of storm water associated with the Facility's industrial activity and any commingled discharges. *See* 2015 Permit, § XI(B)(4); *see also* 1997 Permit § B(5)(a). "The Discharger shall collect and analyze storm water samples from two (2) [qualifying storm events] QSEs within the first half of each reporting year (July 1 to December 31), and two (2) QSEs within the second half of each reporting year (January 1 to June 30)." 2015 Permit, XI(B)(2). A discharger must submit the sampling and analytical results to the State Board's SMARTs database "within 30 days of obtaining all results for each sampling event." 2015 Permit, XI(B)(11)(a).

On information and belief, CSPA alleges that during the 2014-2015 reporting year, Calstone failed to collect and analyze storm water samples from all four requisite storm events. CSPA alleges that local precipitation data shows that discharges occurred on several dates during that wet season on which the Facility was open. Specifically, CSPA alleges that discharges occurred on the following dates where discharges from qualifying rain events occurred but a storm sample was not taken at the Facility:

- May 15, 2015
- June 11, 2015

Because Calstone failed to take any of the four requisite water samples from the Facility's discharge location for the entire 2014-2015 reporting year, Calstone has violated the General Permit's monitoring requirement for that entire period, amounting to at least 2 violations of the Act. These violations of the General Permit are ongoing. Calstone is subject to penalties for each of those daily violations of the General Permit and the Act's monitoring and sampling requirements.

On information and belief, CSPA alleges that during the 2015-2016 reporting year, Calstone failed to collect and analyze storm water samples from three of the requisite four storm events. CSPA alleges that local precipitation data shows that discharges occurred on several dates during that wet season on which the Facility was open. Specifically, CSPA alleges that discharges occurred on the following dates where discharges from qualifying rain events occurred but a storm sample was not taken at the Facility:

- October 1, 2015
- November 2, 2015
- November 9, 2015
- November 16, 2015
- November 25, 2015
- December 11, 2015
- December 14, 2015
- December 21, 2015
- December 28, 2015
- January 5, 2016
- January 18, 2016
- February 18, 2016

Because Calstone failed to take two of the four requisite water samples from the Facility's discharge location for the entire 2015-2016 reporting year, Calstone has violated the General Permit's monitoring requirement for that entire period, amounting to at least 2 violations of the Act. These violations of the General Permit are ongoing. Calstone is subject to penalties for each of those daily violations of the General Permit and the Act's monitoring and sampling requirements.

On information and belief, CSPA alleges that during the 2016-2017 reporting year, Calstone failed to collect and analyze storm water samples from two of the requisite four storm events. CSPA alleges that local precipitation data shows that discharges occurred on several dates during that wet season on which the Facility was open. Specifically, CSPA alleges that discharges occurred on the following dates where discharges from qualifying rain events occurred but a storm water sample was not taken at the Facility:

- October 5, 2016
- October 17, 2016

- October 25, 2016
- October 28, 2016
- December 8, 2016
- December 16, 2016
- January 3, 2017
- January 18, 2017
- February 3, 2017
- February 6, 2017
- February 10, 2017
- March 20, 2017
- March 27, 2017
- April 7, 2017
- April 17, 2017

Because Calstone failed to take two of the four requisite water samples for the entire 2016-2017 reporting year, Calstone has violated the General Permit's monitoring requirement for that entire period, amounting to at least 2 violations of the Act. These violations of the General Permit are ongoing. Calstone is subject to penalties for each of those daily violations of the General Permit and the Act's monitoring and sampling requirements.

On information and belief, CSPA alleges that during the 2017-2018 reporting year, Calstone failed to collect and analyze storm water samples from two of the requisite four storm events. CSPA alleges that local precipitation data compared to dates when the Facility did collect storm water samples shows that discharges occurred on several dates during that wet season on which the Facility was open. Specifically, CSPA alleges that discharges occurred on the following dates where discharges from qualifying rain events occurred but a storm water sample was not taken at the Facility:

- November 14, 2017
- November 17, 2017
- November 27, 2017
- January 3, 2018
- January 8, 2018
- February 27, 2018
- March 2, 2018
- March 14, 2018
- March 21, 2018
- April 6, 2018
- April 17, 2018

Because Calstone failed to take two of the four requisite water samples for the entire 2017-2018 reporting year, Calstone has violated the General Permit's monitoring requirement for that entire period, amounting to at least 2 violations of the Act. These violations of the General

Permit are ongoing. Calstone is subject to penalties for each of those daily violations of the General Permit and the Act's monitoring and sampling requirements.

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

Under the General Permit, the State Board has designated the SWPPP as one of the cornerstones of compliance with NPDES requirements for storm water discharges from industrial facilities, and ensuring that operators meet effluent and receiving water limitations. Section A(1) and Provision E(2) of the 1997 Permit require dischargers to develop and implement a SWPPP prior to beginning industrial activities that meet all of the requirements of the 1997 Permit. The objective of the SWPPP requirement is to identify and evaluate sources of pollutants associated with industrial activities that may affect the quality of storm water discharges and authorized non-stormwater discharges from the facility, and to implement BMPs to reduce or prevent pollutants associated with industrial activities in storm water discharges and authorized non-stormwater discharges. *See* 1997 Permit § A(2); 2015 Permit § X(C). These BMPs must achieve compliance with the General Permit's effluent limitations and receiving water limitations. To ensure compliance with the General Permit, the SWPPP must be evaluated and revised as necessary. 1997 Permit §§ A(9), (10); 2015 Permit § X(B). Failure to develop or implement an adequate SWPPP, or update or revise an existing SWPPP as required, is a violation of the General Permit. 2015 Permit Factsheet § I(1).

Sections A(3)-A(10) of the 1997 Permit set forth the requirements for a SWPPP. Among other requirements, the SWPPP must include: a pollution prevention team; a site map; a list of significant materials handled and stored at the site; a description of potential pollutant sources; an assessment of potential pollutant sources; 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-stormwater discharges, including structural BMPs where non-structural BMPs are not effective. Sections X(D)–X(I) of the 2015 Permit set forth essentially the same SWPPP requirements as the 1997 Permit, except that all dischargers are now required to develop and implement a set of minimum BMPs, as well as any advanced BMPs as necessary to achieve BAT/BCT, which serve as the basis for compliance with the 2015 Permit's technology-based effluent limitations. *See* 2015 Permit § X(H). The 2015 Permit further requires a more comprehensive assessment of potential pollutant sources than the 1997 Permit; more specific BMP descriptions; and an additional BMP summary table identifying each identified area of industrial activity, the associated industrial pollutant sources, the industrial pollutants, and the BMPs being implemented. *See* 2015 Permit §§ X(G)(2), (4), (5).

The 2015 Permit requires dischargers to implement and maintain, to the extent feasible, all of the following minimum BMPs in order to reduce or prevent pollutants in industrial storm water discharges: good housekeeping, preventive maintenance, spill and leak prevention and response, material handling and waste management, erosion and sediment controls, an employee training program, and quality assurance and record keeping. *See* 2015 Permit, § X(H)(1). Failure to implement all of these minimum BMPs is a violation of the 2015 Permit. *See* 2015 Permit Fact Sheet § I(2)(o). The 2015 Permit further requires dischargers to implement and maintain, to the

extent feasible, any one or more of the following advanced BMPs necessary to reduce or prevent discharges of pollutants in industrial storm water discharges: exposure minimization BMPs, storm water containment and discharge reduction BMPs, treatment control BMPs, and other advanced BMPs. *See* 2015 Permit, § X(H)(2). Failure to implement advanced BMPs as necessary to achieve compliance with either technology or water quality standards is a violation of the 2015 Permit. *Id.* The 2015 Permit also requires that the SWPPP include BMP Descriptions and a BMP Summary Table. *See* 2015 Permit § X(H)(4), (5). A Facility's BMPs must, at all times, be sufficiently robust to meet the General Permit's and 33 U.S.C. ¶ 1342(p)(3)(A)'s requirement that all discharges associated with industrial activities be subjected to BAT and BCT. 2015 Permit §§ V(A), I(A)(1), I(D)(31), I(D)(32); 1997 Permit, Effluent Limitation B(3), Receiving Water Limitation C(3).

Despite these SWPPP and BMP requirements, Calstone has been conducting and continues to conduct industrial operations at the Facility with an inadequately developed, implemented, and/or revised SWPPP.

The SWPPP fails to comply with the requirements of Section X(H) of the 2015 Permit. The Facility's SWPPP fails to identify each BMP being implemented at the Facility. The Facility's Level 2 ERA Action Plan and Technical Report identifies additional BMPs not identified in the Facility's 2017 SWPPP, the latest SWPPP the Facility uploaded to SMARTS.

The Facility's storm water samples and discharge observations have consistently exceeded NALs and EPA benchmarks with only cursory BMPs installed at the Facility, demonstrating the failure of its BMPs to reduce or prevent pollutants associated with industrial activities in the Facility's discharges consistent with the BAT and BCT requirements. Despite these exceedances, Calstone has failed to sufficiently update the Facility's SWPPP. The Facility's SWPPP has therefore never achieved the General Permit's objective to identify and implement BMPs to reduce or prevent pollutants associated with the industrial activities in storm water discharges consistent with reductions achieved by implementing BAT and BCT at the Facility.

CSPA puts Calstone on notice that it violates the General Permit and the CWA every day that the Facility operates with an inadequately developed, implemented, and/or revised SWPPP. These violations are ongoing, and CSPA will include additional violations as information and data become available. Calstone is subject to civil penalties for all violations of the CWA occurring since November 21, 2014.

III. Alleged Violations of the NPDES General Construction Permit.

A. Failure to Comply with Risk Level 1 Requirements.

Section IX of the General Construction Permit requires Risk Level 1 Dischargers to comply with the requirements stated in Attachment C of the General Construction Permit. On information and belief, CSPA alleges that Calstone has been a Risk Level 1 Discharger since at least September 1, 2018. On information and belief, CSPA alleges that Calstone has failed and is

continuously failing to comply with numerous requirements set forth in Attachment C of the General Construction Permit.

i. Failure to Comply with BCT and Sediment Control Requirements

Section A(1)(b) of Attachment C of the General Construction Permit requires that Risk Level 1 dischargers "shall minimize or prevent pollutants in storm water discharges and authorized non-storm water discharges through the use of controls, structures, and management practices that achieve BAT for toxic and non-conventional pollutants and BCT for conventional pollutants." CSPA is informed and believes, and thereupon alleges that Calstone has failed to implement BCT measures associated with its construction activities resulting in or contributing to excessive levels of TSS being discharged during storm events from the Facility.

Section (E)(1) of Attachment C of the General Construction Permit requires Risk Level 1 dischargers to establish and maintain effective perimeter controls and stabilize all construction entrances and exits to sufficiently control erosion and sediment discharges from the site." Calstone's 2018-2019 Annual Report indicates that required erosion controls were not fully implemented at the construction site. Likewise, Calstone's 2018-2019 Annual Report indicates that required sediment controls were not fully implemented at the construction site. On information and belief, CSPA alleges that Calstone has failed to comply with this requirement.

On information and belief, CSPA alleges that these violations have occurred daily since at least September 1, 2018, and are ongoing. Consistent with the five-year statute of limitations applicable to citizen enforcement actions brought pursuant to the federal Clean Water Act, Calstone is subject to penalties for violations of the General Construction Permit and the Act's BCT and sediment control requirements since at least September 1, 2018.

ii. Failure to Comply with Inspection, Maintenance and Repair Requirements

Section G(1) of Attachment C of the General Construction Permit requires Risk Level 1 dischargers to "ensure that all inspection, maintenance repair and sampling activities at the project location" are performed or supervised by a Qualified SWPPP Practitioner (QSP) that represents the discharger. Calstone's 2018-2019 Annual Report indicates that all site inspections, maintenance, and repairs were not performed by a QSP. On information and belief, CSPA alleges that Calstone has failed to comply with this requirement.

Section G of Attachment C also requires Risk Level 1 dischargers to perform weekly inspections and observations, perform inspections and observations during extended storm events, identify and record BMPs that need maintenance, implement repairs or design changes to BMPs, complete an inspection checklist, and ensure such checklists remain onsite with the SWPPP. Calstone's 2018-2019 Annual Report indicates that site inspections were not performed weekly and at least once each 24-hour period during extended rain events. Calstone's 2018-2019 Annual Report indicates that the Facility's inspection forms and checklists do not meet the

minimum criteria set forth in Section G.5. On information and belief, CSPA alleges that Calstone has failed to comply with these requirements.

Section G of Attachment C also requires Risk Level 1 dischargers to conduct a post-qualifying rain event visual monitoring inspection within 48 hours after the rain event to, among other things, identify any uncontrolled pollutant sources, and check on the design, implementation and effectiveness of BMPs. Calstone's 2018-2019 Annual Report indicates that no post-rain event inspections were conducted. On information and belief, CSPA alleges that Calstone has failed to comply with these requirements.

On information and belief, CSPA alleges that these violations have occurred daily since at least September 1, 2018, and are ongoing. Consistent with the five-year statute of limitations applicable to citizen enforcement actions brought pursuant to the federal Clean Water Act, Calstone is subject to penalties for violations of the General Construction Permit and the Act's inspection, maintenance and repair requirements since at least September 1, 2018.

iii. Failure to Comply with Risk Level 1 Monitoring and Reporting Requirements

Section I of Attachment C of the General Construction Permit sets forth monitoring and reporting requirements for Risk Level 1 dischargers. Section I(1)(a) requires dischargers to develop and implement a written site-specific Construction Site Monitoring Program ("CSMP") that complies with the requirement of Section I, and which shall also be part of the Site's SWPPP. On information and belief, CSPA alleges that Calstone has failed to implement a CSMP that complies with the requirements of Section I of Attachment C of the General Construction Permit.

Section I(3)(a) of Attachment C requires Risk Level 1 dischargers to inspect storm water discharges within 48 hours after each qualifying rain event. Section I(3)(e) also requires Risk Level 1 dischargers to visually inspect storm water drainage areas to identify spills or leaks, and BMPs to determine if they have been properly implemented prior to each qualifying rain event. Calstone's 2018-2019 Annual Report indicates that no pre-rain event inspections were conducted and no qualifying rain events occurred. However, based on information and belief, CSPA alleges that local precipitation data shows that qualifying rain events occurred on several dates during the period in which Calstone has had its General Construction Permit. Specifically, CSPA alleges that qualifying rain events occurred on the following dates but pre and post qualifying rain event inspections were not done at the Site:

- November 22, 2018
- December 17, 2018
- January 17, 2019
- February 4, 2019
- February 11, 2019
- March 4, 2019
- March 23, 2019

On information and belief, CSPA alleges that Calstone has failed to comply with these requirements.

Section I(3)(e) of Attachment C also requires Risk Level 1 dischargers to conduct, within 2 business days (48 hours) prior to each predicted qualifying rain event, visual inspections in compliance with CGP Attachment C, Section I(3)(e) and (f). Calstone's 2018-2019 Annual Report indicates that no pre-rain event inspections were conducted and no qualifying rain events occurred. On information and belief, and the qualifying rain dates listed above, CSPA alleges that Calstone has failed to comply with these requirements.

Section I(3)(h) of Attachment C requires Risk Level 1 dischargers to "maintain on-site records of all visual observations (inspections), personnel performing the observations, observation dates, weather conditions, locations observed, and corrective actions taken in response to the observations." Calstone's 2018-2019 Annual Report indicates that all visual inspection records are not retained on-site. On information and belief, CSPA alleges that Calstone has failed to comply with these requirements.

On information and belief, CSPA alleges that these violations have occurred daily since at least September 1, 2018, and are ongoing. Consistent with the five-year statute of limitations applicable to citizen enforcement actions brought pursuant to the federal Clean Water Act, Calstone is subject to penalties for violations of the General Construction Permit and the Act's monitoring and reporting requirements since at least September 1, 2018.

B. Failure to Comply with Training and QSP Requirements.

Section VII of the General Construction Permit sets forth the training qualifications and certification requirements. Section VII(A) requires dischargers to "ensure that all persons responsible for implementing requirements of this General [Construction] Permit shall be appropriately trained in accordance with this Section. Training should be both formal and informal, occur on an ongoing basis, and should include training offered by recognized governmental agencies or professional organizations." Those persons "responsible for preparing and amending SWPPPs shall comply with the requirements in this Section VII." Additionally, dischargers are required to provide documentation of all training for persons responsible for implementing the requirements of this General Permit in the Annual Reports." Calstone's 2018-2019 Annual Report indicates that the persons responsible for implementing the requirements of the permit were not appropriately trained and that complete training records were not kept on-site or were available upon request. On information and belief, CSPA alleges that Calstone has failed to comply with these requirements.

Section VII(B)(3) additionally requires dischargers to "ensure that all BMPs required for this General Permit are implemented by a Qualified SWPPP Practitioner (QSP)." Calstone's 2018-2019 Annual Report indicates that the individual conducting the BMP installation, inspection, maintenance and reports was not a QSP. On information and belief, CSPA alleges that Calstone has failed to comply with this requirement.

On information and belief, CSPA alleges that these violations have occurred daily since at least September 1, 2018, and are ongoing. Consistent with the five-year statute of limitations applicable to citizen enforcement actions brought pursuant to the federal Clean Water Act, Calstone is subject to penalties for violations of the General Construction Permit and the Act's training and QSP requirements since at least September 1, 2018.

C. Failure to Ensure Storm Water Pollution Prevention Plan is Implemented by QSP.

Section VII(B) of the General Construction Permit Requires that a "discharger shall ensure that all BMPs required by this General Permit are implemented by a Qualified SWPPP Practitioner (QSP)." Despite this requirement, Calstone has failed to ensure that it's SWPPP has been implemented by a QSP. On information and belief, CSPA alleges that Calstone failed to ensure implementation of ithe Site's SWPPP for all of the reasons identified in Paragraphs III.A and III.B above..

CSPA puts Calstone on notice that it violates the General Construction Permit and the CWA every day that the Site operates with an inadequately implemented SWPPP by a qualified QSP. These violations are ongoing and have been occurring since at least September 1, 2018. CSPA will include additional violations as information and data become available. Calstone is subject to civil penalties for all violations of the CWA occurring since at least September 1, 2018.

IV. Persons Responsible for the Violations.

CSPA puts Calstone, Matt Morey, and Michael Murray 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 puts Calstone, Matt Morey, and Michael Murray on notice that it intends to include those subsequently identified persons in this action.

V. Name and Address of Noticing Parties.

The name, address and telephone number of CSPA is as follows:

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

VI. Counsel.

CSPA has retained legal counsel to represent it in this matter. Please direct all communications to:

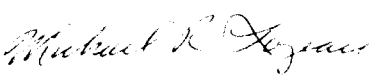
Michael R. Lozeau
Lozeau Drury LLP
1939 Harrison Street, Suite 150
Oakland, California 94612
Tel. (510) 836-4200
michael@lozeaudrury.com

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) each separate violation of the Act subjects Calstone to a penalty of up to $37,500 per day per violation for all violations occurring since November 21, 2014, up to and including November 2, 2015, and up to $54,833 for violations occurring after November 2, 2015. In addition to civil penalties, CSPA will seek injunctive relief preventing further violations of the Act pursuant to Sections 505(a) and (d) (33 U.S.C. §1365(a) 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 believes this Notice of Violations and Intent to File Suit sufficiently states grounds for filing suit. CSPA intends to file a citizen suit under Section 505(a) of the Act against Calstone 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 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 suggests 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 does not intend to delay the filing of a complaint in federal court if discussions are continuing when that period ends.

Sincerely,



Michael R. Lozeau
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U.S. Environmental Protection Agency
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Sacramento, CA 95812-0100

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Mike Stoker, Regional Administrator
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San Francisco, CA, 94105

Patrick Pulupa, Executive Officer
Regional Water Quality Control Board
Central Valley Region
11020 Sun Center Drive #200
Rancho Cordova, CA 95670-6114

ATTACHMENT A
Rain Dates, Calstone, Tracy, CA

05/15/2015	10/29/2016	03/27/2017
06/11/2015	11/19/2016	04/07/2017
10/01/2015	11/20/2016	04/08/2017
11/02/2015	11/21/2016	04/09/2017
11/03/2015	11/27/2016	04/17/2017
11/09/2015	11/28/2016	04/18/2017
11/10/2015	12/08/2016	11/14/2017
11/16/2015	12/11/2016	11/17/2017
11/25/2015	12/12/2016	11/27/2017
12/11/2015	12/16/2016	01/03/2018
12/14/2015	12/23/2016	01/04/2018
12/21/2015	12/24/2016	01/06/2018
12/22/2015	01/03/2017	01/08/2018
12/25/2015	01/04/2017	01/09/2018
12/28/2015	01/05/2017	01/10/2018
01/05/2016	01/07/2017	02/27/2018
01/06/2016	01/08/2017	03/02/2018
01/07/2016	01/09/2017	03/04/2018
01/16/2016	01/10/2017	03/05/2018
01/18/2016	01/11/2017	03/14/2018
01/19/2016	01/12/2017	03/15/2018
01/20/2016	01/18/2017	03/16/2018
01/23/2016	01/19/2017	03/18/2018
01/30/2016	01/20/2017	03/21/2018
02/01/2016	01/21/2017	03/23/2018
02/18/2016	01/22/2017	04/06/2018
03/05/2016	01/23/2017	04/07/2018
03/06/2016	02/03/2017	04/17/2018
03/07/2016	02/06/2017	10/03/2018
03/08/2016	02/07/2017	10/04/2018
03/12/2016	02/08/2017	11/22/2018
03/13/2016	02/10/2017	11/24/2018
03/14/2016	02/18/2017	11/26/2018
04/09/2016	02/20/2017	11/29/2018
04/10/2016	02/21/2017	11/30/2018
04/23/2016	02/22/2017	12/02/2018
05/07/2016	03/05/2017	12/03/2018
10/05/2016	03/20/2017	12/05/2018
10/15/2016	03/21/2017	12/17/2018
10/17/2016	03/22/2017	12/25/2018
10/25/2016	03/23/2017	01/06/2019
10/28/2016	03/25/2017	01/07/2019

ATTACHMENT A
Rain Dates, Calstone, Tracy, CA

01/10/2019
01/16/2019
01/17/2019
01/21/2019
01/22/2019
02/02/2019
02/03/2019
02/04/2019
02/05/2019
02/09/2019
02/10/2019
02/11/2019
02/13/2019
02/14/2019
02/15/2019
02/17/2019
02/27/2019
03/02/2019
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