LOZEAU DRURY LLP

T 510.836.4200
F 510.836.4205

410 12th Street, Suite 250
Oakland, Ca 94607

www.lozeaudrury.com
doug@lozeaudrury.com

VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED

March 27, 2014

Rick Mitchell, Plant Manager
Douglas Fierce
Dragon Products, Ltd.
15700 South McKinley Ave.
Lathrop, CA 95330

Will Crenshaw, Chairman/CEO
Casey Crenshaw, President
Douglas Fierce
Dragon ESP Ltd.
1655 Louisiana St.
Beaumont, TX 77701

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

Dear Messrs. Mitchell, Fierce, Crenshaw, and Crenshaw:

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 Dragon ESP Ltd.'s facility, Dragon Products, Ltd. ("Facility") located at 15700 South McKinley Avenue in Lathrop, California. CSPA is a non-profit public benefit corporation dedicated to the preservation, protection, and defense of the environment, wildlife, and natural resources of the San Joaquin River and other California waters. This letter is being sent to Dragon Products, Ltd., Dragon ESP Ltd., Rick Mitchell, Douglas Fierce, Will Crenshaw, and Casey Crenshaw as the responsible owners, officers, or operators of the Facility (all recipients are hereinafter collectively referred to as "Dragon Products").

This letter addresses Dragon Products' unlawful discharge of pollutants from the Facility through channels that flow into the San Joaquin River. 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 WDID identification number for the Facility listed on documents submitted to the California Regional Water Quality Control Board, Central Valley Region ("Regional Board") is 5S39I021930. The Facility is engaged in ongoing violations of the substantive and procedural requirements of the General Permit.

Section 505(b) of the Federal Water Pollution Control Act ("Clean Water Act" or "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 Violation and Intent to File Suit provides notice of the violations that have occurred, and continue to occur, at the Facility. Consequently, Dragon Products is hereby placed on formal notice by CSPA 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 Dragon Products 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 18, 2008, Dragon Products submitted its Notice of Intent to Comply with the Terms of the General Permit to Discharge Storm Water Associated with Industrial Activity ("NOI") to the Regional Board. In its NOI, Dragon Products certifies that the Facility is classified under SIC code 3537, "commercial machinery manufacturing facilities." The Facility collects and discharges storm water from its 6.5-acre, mostly paved industrial site from at least six storm water outfalls. On information and belief, CSPA alleges that all storm water discharges from the Facility contain storm water that is commingled with runoff from the Facility from areas where industrial processes occur. The outfalls discharge to channels that flow to the San Joaquin River.

The Regional Board has identified beneficial uses of the Central Valley Region's waters and established water quality standards for the San Joaquin River and its tributaries 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* http://www.waterboards.ca.gov/centralvalley/water_issues/basin_plans/sacsjr.pdf. The beneficial uses of the San Joaquin River and its tributaries include among others water contact recreation, non-contact water recreation, municipal and domestic water supply, endangered and threatened species habitat, shellfish harvesting, 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 II-1.00 – II-2.00. Visible pollution, including visible sheens and cloudy or muddy water from industrial areas, impairs people's use of the San Joaquin River for contact and non-contact water recreation.

The Basin Plan establishes water quality standards for the San Joaquin River and its tributaries. 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 III-8.01. It provides that "[w]ater shall not contain floating material in amounts that cause nuisance or adversely affect beneficial uses." *Id.* at III-5.00. It provides that "[w]ater shall be free of discoloration that causes nuisance or adversely affects beneficial uses." *Id.* It provides that "[w]aters shall not contain suspended materials in concentrations that cause nuisance or adversely affect beneficial uses." *Id.* at III-7.00. 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 III-6.00. The Basin Plan provides that the pH shall not be depressed below 6.5 nor raised above 8.5. *Id.*

The Effluent Limitations of the General Permit prohibit the discharge of pollutants from the Facility in concentrations above the level commensurate with the application of best available technology economically achievable ("BAT") for toxic pollutants and best conventional pollutant control technology ("BCT") for conventional pollutants. *See* General Permit, Order Part B(3). The EPA has published Benchmark values set at the maximum pollutant concentration present if an industrial facility is employing BAT and BCT.[1] The following benchmarks have been established for pollutants discharged by Dragon Products: pH – 6.0 - 9.0 standard units ("s.u."); total suspended solids ("TSS") – 100 mg/L, oil and grease ("O&G") – 15 mg/L, and total organic carbon – 110 mg/L.

II. Alleged Violations of the NPDES Permit.

A. Discharges in Violation of the Permit

Dragon Products 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 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

[1] The Benchmark Values can be found at: http://www.epa.gov/npdes/pubs/msgp2008_finalpermit.pdf (Last accessed on March 27, 2014).

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 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 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.

Dragon Products has discharged and continues to discharge storm water with unacceptable levels of TSS, pH, and other pollutants in violation of the General Permit. Dragon Products' 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 numeric water quality standards established in the Basin Plan. They have thus violated Discharge Prohibitions A(1) and A(2) and Receiving Water Limitations C(1) and C(2), are evidence of ongoing violations of Effluent Limitation B(3) of the General Permit, and constitute unauthorized discharges of pH and storm water associated with industrial activity in violation of Section 301(a) of the CWA.

Date	**Parameter**	**Observed Concentration**	**Basin Plan Water Quality Objective**	**Outfall (as identified by the Facility)**
4/16/2013	pH	5.39 s.u.	6.5 – 8.5 s.u.	Outfall #3 & 4
4/16/2013	pH	5.5 s.u.	6.5 – 8.5 s.u.	Outfall #5 & 6
12/14/2012	pH	5.85 s.u.	6.5 – 8.5 s.u.	Outfall #1 & 2
12/14/2012	pH	6.15 s.u.	6.5 – 8.5 s.u.	Outfall #3 & 4
12/14/2012	pH	5.45 s.u.	6.5 – 8.5 s.u.	Outfall #5 & 6
4/12/2012	pH	5.64 s.u.	6.5 – 8.5 s.u.	Outfall #1 & 2

4/12/2012	pH	5.46 s.u.	6.5 – 8.5 s.u.	Outfall #3 & 4
4/12/2012	pH	5.78 s.u.	6.5 – 8.5 s.u.	Outfall #5 & 6
12/15/2011	pH	5.68 s.u.	6.5 – 8.5 s.u.	Outfall #1 & 2
12/15/2011	pH	5.55 s.u.	6.5 – 8.5 s.u.	Outfall #3 & 4
12/15/2011	pH	5.57 s.u.	6.5 – 8.5 s.u.	Outfall #5 & 6
12/8/2010	pH	6.41 s.u.	6.5 – 8.5 s.u.	Outfall #1 & 2
12/8/2010	pH	6.38 s.u.	6.5 – 8.5 s.u.	Outfall #3 & 4
10/13/2010	pH	6.48 s.u.	6.5 – 8.5 s.u.	Outfall #1 & 2
10/13/2010	pH	6.44 s.u.	6.5 – 8.5 s.u.	Outfall #3 & 4

The information in the above table reflects data gathered from Dragon Products' self-monitoring during the 2009-2010, 2010-2011, 2011-2012, and 2012-2013 wet seasons. CSPA alleges that since March 27, 2009, and continuing through today, Dragon Products has discharged storm water contaminated with pollutants at levels that exceed the applicable water quality standard for pH (6.5 – 8.5 s.u.). In addition, CSPA alleges that Dragon Products violated the narrative standard in the Basin Plan for oil and grease, when it observed a visible oil sheen in storm water discharges on December 29, 2010, at all six storm water discharge locations.

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), are evidence of ongoing violations of Effluent Limitation B(3) of the General Permit.

Date	Parameter	Observed Concentration	EPA Benchmark Value	Outfall (as identified by the Facility)
4/16/2013	Total Suspended Solids	380 mg/L	100 mg/L	Outfall #1 & 2
4/16/2013	Total Suspended Solids	240 mg/L	100 mg/L	Outfall #3 & 4
4/16/2013	pH	5.39 s.u.	6.0 – 9.0 s.u.	Outfall #3 & 4
4/16/2013	pH	5.5 s.u.	6.0 – 9.0 s.u.	Outfall #5 & 6
12/14/2012	Total Suspended Solids	400 mg/L	100 mg/L	Outfall #1 & 2
12/14/2012	pH	5.85 s.u.	6.0 – 9.0 s.u.	Outfall #1 & 2
12/14/2012	Total Suspended Solids	360 mg/L	100 mg/L	Outfall #3 & 4
12/14/2012	Total Suspended Solids	190 mg/L	100 mg/L	Outfall #5 & 6
12/14/2012	pH	5.45 s.u.	6.0 – 9.0 s.u.	Outfall #5 & 6
4/12/2012	Total Suspended Solids	550 mg/L	100 mg/L	Outfall #1 & 2
4/12/2012	pH	5.64 s.u.	6.0 – 9.0 s.u.	Outfall #1 & 2
4/12/2012	Total Suspended Solids	120 mg/L	100 mg/L	Outfall #3 & 4
4/12/2012	pH	5.46 s.u.	6.0 – 9.0 s.u.	Outfall #3 & 4
4/12/2012	Total Suspended Solids	490 mg/L	100 mg/L	Outfall #5 & 6
4/12/2012	pH	5.78 s.u.	6.0 – 9.0 s.u.	Outfall #5 & 6
12/15/2011	Total Suspended Solids	530 mg/L	100 mg/L	Outfall #1 & 2
12/15/2011	pH	5.68 s.u.	6.0 – 9.0 s.u.	Outfall #1 & 2
12/15/2011	Total Suspended Solids	260 mg/L	100 mg/L	Outfall #3 & 4

12/15/2011	pH	5.55 s.u.	6.0 – 9.0 s.u.	Outfall #3 & 4
12/15/2011	Total Suspended Solids	140 mg/L	100 mg/L	Outfall #5 & 6
12/8/2010	Total Suspended Solids	190 mg/L	100 mg/L	Outfall #1 & 2
12/8/2010	Total Suspended Solids	250 mg/L	100 mg/L	Outfall #3 & 4
12/8/2010	Total Suspended Solids	230 mg/L	100 mg/L	Outfall #5 & 6

The information in the above table reflects data gathered from Dragon Products' self-monitoring during the 2009-2010, 2010-2011, 2011-2012, and 2012-2013 wet seasons. CSPA alleges that since March 27, 2009, and continuing through today, Dragon Products 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:

- Total Suspended Solids – 100 mg/L
- pH – 6.0 – 9.0 s.u.

CSPA's investigation, including its review of Dragon Products' analytical results documenting pollutant levels in the Facility's storm water discharges well in excess of applicable water quality standards and EPA's benchmark values, indicates that Dragon Products has not implemented BAT and BCT at the Facility for its discharges of TSS, pH, and other pollutants, in violation of Effluent Limitation B(3) of the General Permit. Dragon Products was required to have implemented BAT and BCT by no later than October 1, 1992, or since the date the Facility opened. Thus, Dragon Products 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 General Permit. CSPA alleges that such violations also have occurred and will occur on other rain dates, including every significant rain event that has occurred since March 27, 2009, 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 Dragon Products has discharged storm water containing impermissible and unauthorized levels of TSS and pH 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 General Permit.[2]

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 Clean Water Act. Each discharge of storm water constitutes an unauthorized discharge of TSS, pH, and storm water associated with industrial activity in violation of Section 301(a) of the Act.

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[2] The rain dates are all the days when 0.1" or more rain fell as calculated by rain data from a weather station in Manteca approximately four miles from the Facility. The weather data can be obtained at http://www.ipm.ucdavis.edu/calludt.cgi/WXDESCRIPTION?STN=MANTECA.A (Last accessed on March 27 2014).

Consistent with the five-year statute of limitations applicable to citizen enforcement actions brought pursuant to the federal Clean Water Act, Dragon Products is subject to penalties for violations of the General Permit and the Act since March 27, 2009.

C. 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(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."

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 Dragon Products is not representative of the quality of the Facility's various storm water discharges and that the Facility failed to monitor all qualifying storm water discharges, CSPA alleges that the Facility's monitoring program violates Sections B(3), (4), (5) and (7) of the General Permit.

In addition, Dragon Products failed to conduct monthly visual observations of storm water discharges, in violation of Section B(4) of the General Permit, at all storm water discharge locations on the following months (in the indicated years):

2013: January, February, March, May
2012: January, February, March, May, October, November
2011: January, February, April, May, October, November
2010: February, March, October, November

These failures to conduct required visual observations amount to at least 20 separate violations of the General Permit.

The above violations are ongoing. Consistent with the five-year statute of limitations applicable to citizen enforcement actions brought pursuant to the federal Clean Water Act, Dragon Products is subject to penalties for violations of the General Permit and the Act's monitoring and sampling requirements since March 27, 2009.

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

Section A and Provision E(2) of the General 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 investigation of the conditions at the Facility as well as Dragon Products' Annual Reports indicate that Dragon Products has been operating with an inadequately developed or implemented SWPPP in violation of the requirements set forth above. Dragon Products has failed to evaluate the effectiveness of its BMPs and to revise its SWPPP as necessary. Dragon Products has been in continuous violation of Section A and Provision E(2) of the General Permit every day since at least March 27, 2009, at the very latest, and will continue to be in violation every day that Dragon Products fails to prepare, implement, review, and update an effective SWPPP. Dragon Products is subject to penalties for violations of the General Permit and the Act occurring since at March 27, 2009.

E. Failure to File True and Correct Annual Reports

Section B(14) of the General 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 Permit requires the discharger to include in their annual report an evaluation of their storm water controls, including certifying compliance with the General Permit. *See also* General Permit, Sections C(9) and (10) and B(14).

For the previous five years, Dragon Products and Rick Mitchell, inaccurately certified in their Annual Reports that the Facility was in compliance with the General Permit. Consequently, Dragon Products has violated Sections A(9)(d), B(14) and C(9) & (10) of the General Permit every time Dragon Products failed to submit a complete or correct report and every time Dragon Products or its agents falsely purported to comply with the Act. Dragon Products is subject to penalties for violations of Section (C) of the General Permit and the Act occurring since at June 30, 2010.

III. Persons Responsible for the Violations.

CSPA puts Dragon Products 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 Dragon Products on notice that it intends to include those persons in this action.

IV. Name and Address of Noticing Parties.

The name, address and telephone number of California Sportfishing Protection Alliance is as follows:

Bill Jennings, Executive Director
California Sportfishing Protection Alliance
3536 Rainier Avenue
Stockton, CA 95204
Tel. (209) 464-5067
Fax (209) 464-1028
E-Mail: deltakeep@me.com

V. Counsel.

CSPA has retained our office to represent it in this matter. Please direct all communications to:

Michael R. Lozeau
Douglas J. Chermak
Lozeau Drury LLP
410 12th Street, Suite 250
Oakland, California 94607
Tel. (510) 836-4200

michael@lozeaudrury.com
doug@lozeaudrury.com

VI. 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 Dragon Products 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 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 Dragon Products 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,

Douglas J. Chermak
Lozeau Drury LLP
Attorneys for California Sportfishing Protection Alliance

cc via First Class Mail: Capitol Corporate Services, Inc.
Agent for Service of Process for Dragon ESP, L.P. (Entity Number 200312900011)
455 Capitol Mall Complex, Suite 217
Sacramento, CA 95814

SERVICE LIST

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

Thomas Howard, Executive Director
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812-0100

Eric Holder, U.S. Attorney General
U.S. Department of Justice
950 Pennsylvania Avenue, N.W.
Washington, DC 20530-0001

Jared Blumenfeld, Regional Administrator
U.S. EPA – Region 9
75 Hawthorne Street
San Francisco, CA, 94105

Pamela C. Creedon, Executive Officer
Regional Water Quality Control Board
Central Valley Region
11020 Sun Center Drive #200
Rancho Cordova, CA 95670-6114

ATTACHMENT A

Rain Dates, Dragon Products, Lathrop, California

5/1/2009	10/23/2010	5/15/2011
9/14/2009	10/24/2010	5/16/2011
10/13/2009	11/7/2010	5/18/2011
11/27/2009	11/19/2010	6/4/2011
12/7/2009	11/20/2010	6/5/2011
12/10/2009	11/21/2010	6/28/2011
12/11/2009	11/23/2010	10/4/2011
12/12/2009	11/27/2010	10/5/2011
12/13/2009	12/4/2010	11/5/2011
12/28/2009	12/5/2010	11/19/2011
1/12/2010	12/8/2010	11/20/2011
1/13/2010	12/14/2010	12/15/2011
1/17/2010	12/17/2010	1/20/2012
1/18/2010	12/18/2010	1/21/2012
1/19/2010	12/19/2010	1/23/2012
1/20/2010	12/22/2010	2/13/2012
1/21/2010	12/25/2010	2/29/2012
1/25/2010	12/28/2010	3/14/2012
1/26/2010	12/29/2010	3/16/2012
2/21/2010	1/1/2011	3/17/2012
2/23/2010	1/2/2011	3/25/2012
2/26/2010	1/30/2011	3/27/2012
3/2/2010	2/16/2011	3/31/2012
3/3/2010	2/17/2011	4/11/2012
3/12/2010	2/18/2011	4/12/2012
3/30/2010	2/19/2011	4/13/2012
3/31/2010	2/24/2011	4/25/2012
4/2/2010	2/25/2011	10/22/2012
4/4/2010	3/6/2011	10/23/2012
4/11/2010	3/15/2011	11/16/2012
4/20/2010	3/18/2011	11/17/2012
4/21/2010	3/19/2011	11/18/2012
4/27/2010	3/20/2011	11/21/2012
5/10/2010	3/23/2011	11/28/2012
5/25/2010	3/24/2011	11/30/2012
5/27/2010	3/26/2011	12/1/2012
10/6/2010	4/7/2011	12/2/2012
10/17/2010	4/13/2011	12/5/2012

ATTACHMENT A

Rain Dates, Dragon Products, Lathrop, California

12/12/2012
12/15/2012
12/17/2012
12/21/2012
12/22/2012
12/23/2012
12/25/2012
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2/19/2013
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3/30/2013
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1/31/2014
2/2/2014
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