



---

## Central Coast Regional Water Quality Control Board

November 10, 2022

Thomas J Moore  
Big Basin Water Company, Inc.  
16595 Jamison Creek Road  
Boulder Creek, CA 95006  
Email: [bbwater197@yahoo.com](mailto:bbwater197@yahoo.com)

**Via Certified and Electronic Mail  
No. 7019 1640 0000 7909 9994**

Dear Thomas J Moore:

**BIG BASIN WATER COMPANY, INC., BIG BASIN WOODS SUBDIVISION WWTP,  
HWY 236 AND FALLEN LEAF DRIVE, BOULDER CREEK, SANTA CRUZ COUNTY –  
NOTICE OF VIOLATION FOR WASTEWATER TREATMENT SYSTEM  
OPERATIONS, WASTE DISCHARGE REQUIREMENTS ORDER NUMBER 97-26,  
WDID # 3 441001001**

The California Regional Water Quality Control Board, Central Coast Region (Central Coast Water Board) is a state regulatory agency with the responsibility for protecting the quality of the waters of the state within its area of jurisdiction. The Central Coast Water Board has authority to require submission of information, direct action, establish regulations, levy penalties, and bring legal action when necessary to protect water quality. The purpose of this letter is to notify Big Basin Water Company, Inc. (Big Basin Water Company) of alleged violations of state law at its Big Basin Woods Subdivision Wastewater Treatment Plant (WWTP), require a written response describing the actions taken or planned to be taken to address violations and prevent future violations, and explain the potential civil administrative liability for non-compliance with state and federal laws for any unauthorized discharges of waste to waters of the state and waters of the United States.

Big Basin Water Company is collecting untreated wastewater at the WWTP, providing no treatment, and the WWTP components are overflowing and posing an imminent threat to waters of the state and waters of the United States.<sup>1</sup> Big Basin Water Company must immediately cease any unpermitted discharge and must clean up and remove untreated wastewater.

---

<sup>1</sup> An unnamed ephemeral watercourse directly south of the WWTP is tributary to Boulder Creek, located immediately across Highway 236 from the WWTP. The ephemeral watercourse and Boulder Creek are waters of the state. Boulder Creek is a water of the United States. Groundwater beneath the WWTP is waters of the state. See Attachment 2, Figure 8.

**Background**

Big Basin Water Company is a private utility company that owns and operates the WWTP. The WWTP collects and treats wastewater from a 28-home residential community located approximately 2.5 miles north of Boulder Creek on Big Basin Way (Highway 236) in Santa Cruz County. The Central Coast Water Board regulates the WWTP pursuant to Order No. 97-26, *Waste Discharge Requirements for Big Basin Water Company Inc., Big Basin Woods Subdivision, Santa Cruz County* (Permit),<sup>2</sup> for the discharge of domestic wastewater to land.

A significant portion of the residential community homes and portions of the WWTP were damaged or destroyed in the CZU lightning complex fire in August 2020. The WWTP suffered a long-term loss of power, and several vital pieces of process and transmission equipment were destroyed. Two homes in the subdivision were not destroyed during the fire and have occupancy permits through Santa Cruz County. In addition, the nearby fire station is believed to be connected to the WWTP. Big Basin Water Company has stated that these homes have continued to send wastewater to the inoperable WWTP since the fire. During an inspection on September 22, 2022, Central Coast Water Board staff observed that some residents are living semi-permanently in recreational vehicles on their lots. There are also several new homes under construction in the community. See Attachment 2, Figure 5 for a map from Santa Cruz County that indicates which lots are currently connected to the WWTP and under construction.

After the wildfire, Central Coast Water Board staff contacted Mr. Thomas J (Jim) Moore, Big Basin Water Company's chief executive officer and WWTP operator. Mr. Moore explained that the WWTP's electrical system sustained damage during the fire and the WWTP did not have power to operate. Mr. Moore stated that collected wastewater would be pumped regularly from the WWTP and disposed of appropriately while the electrical system was being repaired.

Central Coast Water Board staff has not been able to verify whether regular pumping has occurred at the WWTP over the last two years and three months. During visits from Santa Cruz County staff on September 9, 2021, August 30, 2022, and October 27, 2022, Central Coast Water Board staff on September 22, 2022, and California Department of Fish and Wildlife staff on November 2, 2022, the WWTP basins were full of untreated wastewater and showed evidence of overflowing. See photographs provided in Attachment 1, Figures 3 – 5 and Attachment 2, Figures 4, 6, and 7. Central Coast Water Board staff has requested pumping reports from Big Basin Water Company multiple times (via email on November 22, 2021, and January 11, 2022) and has not received a response. On September 20, 2022, Central Coast Water Board staff reviewed the Santa Cruz County septic hauling online database and did not find any

---

<sup>2</sup> On December 5, 2013, the Central Coast Water Board amended the Permit via Resolution No. R3-2013-0052 to incorporate the December 5, 2013 Standard Provisions and Reporting Requirements for Waste Discharge Requirements (December 2013 Standard Provisions). The December 2013 Standard Provisions are accessible at the following link:

[https://www.waterboards.ca.gov/centralcoast/board\\_decisions/docs/wdr\\_standard\\_provisions\\_2013.pdf](https://www.waterboards.ca.gov/centralcoast/board_decisions/docs/wdr_standard_provisions_2013.pdf)

reports of septic hauling from the Big Basin Woods subdivision. The database conflicts with a communication Mr. Moore had with Santa Cruz County, which indicates that Big Basin Water Company has pumped the wastewater on a weekly basis. Big Basin Water Company has also failed to submit all quarterly reports required by the Permit monitoring and reporting program since the second quarter of 2019, despite receiving a notice of violation sent by the Central Coast Water Board on May 31, 2022 (Attachment 5).

On May 20, 2022, the Central Coast Water Board sent Big Basin Water Company a directive pursuant to Water Code section 13260 (Attachment 4), requiring it to submit a new permit application by June 20, 2022, because the Central Coast Water Board must update the 30-year-old Permit. Over the last several years, the Central Coast Water Board has been sending directives to all facilities with outdated wastewater permits and delayed the directive to Big Basin Water Company to give it time to recover from the fire. Big Basin Water Company has failed to submit an application in response to the directive.

On August 29, 2022, the County of Santa Cruz contacted Central Coast Water Board staff regarding their public health concerns related to the significant mosquito breeding within the wastewater treatment basins at the WWTP. On August 30, 2022, Santa Cruz County mosquito and vector control staff confirmed dense breeding of mosquitos at the WWTP and applied a larvicide to the basins. Santa Cruz County mosquito and vector control staff have continued to treat the basins with larvicide on a regular basis (September 16, 2022, September 30, 2022, and October 27, 2022). See Attachment 3 for Santa Cruz County's inspection report and Attachment 2, Figures 1-3, and 7 for photos.

In September 2022, Central Coast Water Board staff (Water Resource Control Engineers Mark Lemus and Danial Woldearegay) conducted a desk review of available information on file and inspected the WWTP. Central Coast Water Board staff observed violations of the Permit. See Attachment 1 for a copy of the inspection report.

On October 24, 2022, Central Coast Water Board staff met with Santa Cruz County Public Works and Environmental Health staff and California Public Utilities Commission staff to discuss the status of the WWTP. Santa Cruz County provided photos from their site visit on September 9, 2021 (see Attachment 2, Figure 4), and a map showing the status of each parcel in the Big Basin Subdivision (see Attachment 2, Figure 5). California Public Utilities Commission staff stated that they have not received the 2021 annual report from Big Basin Water Company and have not received any recent requests for rate increases to fund facility operations and/or improvements.

On November 2, 2022, a California Department of Fish and Wildlife warden inspected the WWTP. The warden observed the basin on the south side of the WWTP overflowing (see Attachment 2, Figure 6).

### **Alleged Violations**

The Central Coast Water Board alleges that Big Basin Water Company is in violation of Permit requirements. Details of the alleged violations are described below.

- 1. Permit Section D, Provisions, Item 6** requires “*Stand by and/or portable generators shall be available to assure compliance with requirements during power failure.*”

Big Basin Water Company is violating Permit section D.6 by not having generators on the site that would allow the facility to operate without electricity service to maintain permit compliance. During the September 22, 2022 inspection, Central Coast Water Board staff did not observe a standby generator at the site. Big Basin Water Company personnel stated that the WWTP was without power and have not operated any WWTP system components since the fire in 2019.

- 2. Permit Section A, Prohibitions, Item 1** prohibits “*Discharge to areas other than the designated leachfield disposal area.*”

Big Basin Water Company violated Permit section A.1 by discharging untreated wastewater onto the ground adjacent to the basins. On September 9, 2021, Santa Cruz County staff observed evidence of untreated wastewater overflowing one of the basins (see Attachment 2, Figure 4). On August 30, 2022, and October 27, 2022, Santa Cruz County mosquito and vector control staff observed that one of the basins holding untreated wastewater was overflowing (see Attachment 2, Figure 7). Photos from the September 22, 2022 Central Coast Water Board inspection show evidence of basin overflow (see Attachment 1, Figure 4). On November 2, 2022, California Department of Fish and Wildlife staff observed untreated wastewater overflowing one of the basins (see Attachment 2, Figure 6).

- 3. Permit Section D, Provisions, Item 3** requires compliance with “*Standard Provisions and Reporting Requirements for Waste Discharge Requirements.*” **December 2013 Standard Provisions<sup>3</sup> Section A, General Permit Conditions, Provision 7** states, “*Collection, treatment, or discharge of waste shall not create a nuisance or pollution, as defined by Section 13050 of the California Water Code.*”

Big Basin Water Company violated standard provision A.7 by creating a nuisance. Pursuant to Water Code section 13050(m), a “nuisance” means anything which meets all of the following requirements: (1) is injurious to health, or is indecent or offensive to the senses, or an obstruction to the free use of property, so as to interfere with the comfortable enjoyment of life or property; (2)

---

<sup>3</sup> California Regional Water Quality Control Board Central Coast Region, Standard Provisions and Reporting Requirements for Waste Discharge Requirements, December 5, 2013.

affects at the same time an entire community or neighborhood, or any considerable number of persons, although the extent of the annoyance or damage inflicted upon individuals may be unequal; and (3) occurs during, or as a result of, the treatment or disposal of wastes.

The WWTP has been inoperable and is currently just collecting untreated wastewater in open basins. On August 30, 2022, Santa Cruz County mosquito and vector control staff visited the site and reported big stagnant basins of wastewater that had become concentrated mosquito larvae breeding habitat. Santa Cruz County staff reported, *“confirmed dense breeding of Culex species of mosquitoes which can transmit West Nile virus. The large quantities of mosquitoes produced by this wastewater treatment facility constituted a public health concern to the surrounding residents.”* See Attachment 3 for Santa Cruz County’s inspection report and Attachment 2 Figures 1-3 for photos taken by mosquito and vector control staff. Big Basin Water Company has collected untreated wastewater over an extended period of time and there is no evidence of wastewater removal or treatment.

- 4. Permit Section D, Provisions, Item 3** requires compliance with “*Standard Provisions and Reporting Requirements for Waste Discharge Requirements.*” **December 2013 Standard Provisions Section A, General Permit Conditions, Provision 10** states, *“The Discharger shall prevent formation of habitat for carriers of pathogenic microorganisms in any part of the treatment and disposal system.”*

Big Basin Water Company violated standard provision A.10 by not preventing the formation of habitat for carriers of pathogenic microorganisms. As described in item 3 above, the WWTP has been left inoperable and is collecting stagnant wastewater that has become a breeding ground for mosquitos. See Attachment 3 for Santa Cruz County’s inspection report and Attachment 2 Figures 1-3 for photos taken by county mosquito and vector control staff.

- 5. Permit Section D, Provisions, Item 3** requires compliance with “*Standard Provisions and Reporting Requirements for Waste Discharge Requirements.*” **December 2013 Standard Provisions Section A, General Permit Conditions, Provision 12** states, *“The discharger shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) that are installed or used by the discharger to achieve compliance with the conditions of this order. Proper operation and maintenance includes effective performance, adequate funding, adequate operator staff and training, and adequate laboratory and process controls, including appropriate quality assurance procedures. Proper operation and maintenance shall be described in an Operation and Maintenance Manual.”*

Big Basin Water Company violated standard provision A.12 by not properly operating and maintaining all facilities and systems of treatment and control. The WWTP is inoperable and cannot provide adequate wastewater treatment to be

discharged to the environment. Big Basin Water Company has stated that it does not have adequate funding to repair and replace equipment necessary to bring the WWTP back into compliance with the Permit. California Public Utilities Commission staff have stated that they have not received any request over the last several years from Big Basin Water Company to increase rates so that funds are available to operate the WWTP. It has been over two years since the CZU complex fire, and it appears no significant progress has been made by Big Basin Water Company to bring the facility into an operating condition and into compliance with the Permit.

- 6. Permit Section D, Provisions, Item 3** requires compliance with “*Standard Provisions and Reporting Requirements for Waste Discharge Requirements.*” **December 2013 Standard Provisions Section A, General Permit Conditions, Provision 23** states, “*The discharger shall take all reasonable steps to minimize or prevent any discharge or sludge use or disposal in violation of this order that has a reasonable likelihood of adversely affecting human health or the environment.*”

Big Basin Water Company violated standard provision A.23 by not taking reasonable steps to minimize or prevent discharge in violation of the Permit. Central Coast Water Board staff has requested proof that the wastewater has been pumped from the WWTP; however, Big Basin Water Company has not furnished any proof that wastewater has been pumped from the system on a regular frequency. Visits from Santa Cruz County staff on September 9, 2021, August 30, 2022, and October 27, 2022, Central Coast Water Board staff on September 22, 2022, and California Department of Fish and Wildlife staff on November 2, 2022, showed full basins, which indicate that adequate pumping has not occurred on a regular basis. This collected wastewater within the WWTP is overflowing the WWTP facilities and will likely continue to spill on a daily basis as flows are added to the system from the connected properties. In addition, the WWTP conditions pose a significant threat of a spill reaching nearby surface waters<sup>4</sup> during the next significant precipitation event if no action is taken. It has been over two years since the CZU complex fire, and it appears no significant progress has been made by Big Basin Water Company to bring the facility into an operating condition and into compliance with the Permit.

- 7. Permit Section D, Provisions, Item 3** requires compliance with “*Standard Provisions and Reporting Requirements for Waste Discharge Requirements.*” **December 2013 Standard Provisions Section A, General Permit Conditions, Provision 27**, states that *safeguards, “shall be provided to ensure maximal compliance with all terms and conditions of this order. Safeguards shall include preventative and contingency plans and may also include alternative power sources, stand-by generators, retention capacity, operating procedures, or other*

---

<sup>4</sup> An unnamed ephemeral watercourse lies directly south of the WWTP and is tributary to Boulder Creek, located immediately across Highway 236 from the WWTP. See Attachment 2, Figure 8.

*precautions. Preventative and contingency plans for controlling and minimizing the effect of accidental discharges shall:*

*a. Identify possible situations that could cause "upset," "overflow," "bypass," or other noncompliance. (Loading and storage areas, power outage, waste treatment unit outage, and failure of process equipment, tanks, or pipes should be considered.)*

*b. Evaluate the effectiveness of present facilities and procedures and describe procedures and steps to minimize or correct any adverse environmental impact resulting from noncompliance with the order."*

Big Basin Water Company violated standard provision A.27 by not having any safeguards in place to ensure compliance with the terms and conditions of the Permit. Big Basin Water Company has not prevented or minimized overflow.

- 8. Permit Section D, Provisions, Item 2** requires compliance with “ ‘*Monitoring and Reporting Program No. 97-26*’ as specified by the Executive Officer.” Monitoring and Reporting Program No. 97-26 requires submittal of quarterly reports to the Central Coast Water Board.

Big Basin Water Company violated Permit section D.2 by failing to submit quarterly reports between April and October 2022. The Central Coast Water Board sent a notice of violation to Big Basin Water company on May 31, 2022, for missing quarterly reports with due dates from October 20, 2019, through January 20, 2022 (see Attachment 5). In addition to the reports identified in the May 31, 2022 notice of violation, the Central Coast Water Board has not received quarterly reports for:

- Quarter 1, 2022 due April 20, 2022
- Quarter 2, 2022 due July 20, 2022
- Quarter 3, 2022 due October 20, 2022

- 9. Permit Section B, Discharge Specifications, Item 2** requires effluent discharged to the leachfield disposal area to not exceed a settleable solids maximum of 0.7 mL/L.

Big Basin Water Company violated Permit section B.2 by discharging effluent that exceeds the settleable solids limit. In reports provided by Big Basin Water Company, the settleable solids exceeded the limit on March 1, 2019, and April 1, 2019.

- 10. Permit Section D, Provisions, Item 3** requires compliance with “ ‘Standard Provisions and Reporting Requirements for Waste Discharge Requirements.’ ” **December 2013 Standard Provisions Section A, General Permit Conditions, Provision 19** states, “*Wastewater treatment plants shall be supervised and operated by persons possessing certificates of appropriate grade pursuant to the California Water Code and Title 23 of the California Code of Regulations.*”

Big Basin Water Company violated standard provision A.19. According to the State Water Resources Control Board Office of Operator Certification's database, Thomas J Moore's grade II operator certification expired in 2013, and the certification has not been renewed. In addition, Central Coast Water Board staff determined in October 2022 that the WWTP requires a grade III operator. Going forward, the WWTP will need to be supervised and operated by a grade III operator to be in compliance with standard provision A.19.

### **Requirements for Written Response to Alleged Violations**

Big Basin Water Company must address the alleged violations described above and perform immediate and regular pumping. Big Basin Water Company must **submit by November 28, 2022**, a written response describing the actions taken or planned to address the above alleged violations and prevent future violations. For violations that Big Basin Water Company has not addressed immediately, the response must include a time schedule for corrective actions to bring the WWTP back into compliance with the requirements of the Permit.

Responses must be submitted electronically to the email addresses below:

[Danial.Woldearegay@waterboards.ca.gov](mailto:Danial.Woldearegay@waterboards.ca.gov)

*and*

[RB3-WDR@waterboards.ca.gov](mailto:RB3-WDR@waterboards.ca.gov)

This notice of violation is intended to facilitate a timely remedy to address the Big Basin Water Company's alleged Permit violations. Central Coast Water Board staff will determine the need to recommend further enforcement actions based upon Big Basin Water Company, Inc.'s responses and future compliance with the Permit, Water Code, and Clean Water Act.

### **Potential Administrative Civil Liability**

Big Basin Water Company is hereby on notice that each discharge of waste to waters of the state in violation of the Permit or Water Quality Control Plan for the Central Coastal Basin (Basin Plan)<sup>5</sup> subjects Big Basin Water Company to liability under Water Code section 13350(e). Water Code section 13350(e) authorizes the Central Coast Water Board to impose administrative civil liability of up to \$5,000 per day of violation or \$10 per gallon of waste discharged. Alternatively, the superior court may impose civil liability for each violation of up to \$15,000 per day or \$20 per gallon of waste discharged.

Big Basin Water Company does not have a permit to discharge pollutants to waters of the United States. Unpermitted discharges of pollutants to waters of the United States are violations of federal Clean Water Act (Clean Water Act) section 301. Clean Water

---

<sup>5</sup> Water Quality Control Plan for the Central Coast Region, June 2019 edition, [https://www.waterboards.ca.gov/centralcoast/publications\\_forms/publications/basin\\_plan/index.html](https://www.waterboards.ca.gov/centralcoast/publications_forms/publications/basin_plan/index.html) (Section 5.4.2.2 prohibits discharges containing fecal material from humans to waters of the state)



Act section 301 violations are subject to liability under Water Code section 13385, which authorizes the Central Coast Water Board to impose administrative civil liability of up to \$10,000 per day of violation and \$10 per gallon discharged but not cleaned up over 1,000 gallons. Alternatively, a court may impose civil liability of up to \$25,000 for each day the violation occurs, and up to \$25 per gallon of waste discharged but not cleaned up over 1,000 gallons.

Big Basin Water Company's failure to submit quarterly reports between April and October 2022, is a violation of Water Code section 13267. Pursuant to Water Code section 13268, any person failing or refusing to furnish technical or monitoring program reports required under Water Code section 13267, or falsifying any information provided therein, is guilty of a misdemeanor and subject to an administrative civil liability of up to one thousand dollars (\$1,000) for each day the report is late. Liability for each late reports continues to accrue until the report is submitted to the Central Coast Water Board.

Furthermore, the Central Coast Water Board reserves the right to take any enforcement action authorized by law including, but not limited to, the issuance of a cleanup and abatement order pursuant to Water Code section 13304 or a cease and desist order pursuant to Water Code sections 13301 and 13303.

### **Conclusion**

Big Basin Water Company must ensure compliance with the Permit and must perform immediate and regular pumping of the wastewater at the WWTP to ensure protection of human health and the environment. Big Basin Water Company must not allow additional connections to the system until the WWTP is fully operational and can appropriately treat wastewater in compliance with the Permit. The facility currently poses a threat to human health and the environment by allowing wastewater to continue to overflow the basins, threatening to reach waters of the state and/or waters of the United States.

If you have a questions, please contact Central Coast Water Board staff **Mark Lemus** at (805) 549-3703, [Mark.Lemus@Waterboards.ca.gov](mailto:Mark.Lemus@Waterboards.ca.gov), **Danial Woldearegay** at (805) 549-3892, [Danial.Woldearegay@Waterboards.ca.gov](mailto:Danial.Woldearegay@Waterboards.ca.gov), or Jennifer Epp at (805) 594-6181, [Jennifer.Epp@Waterboards.ca.gov](mailto:Jennifer.Epp@Waterboards.ca.gov).

Sincerely,

*for* Thea S. Tryon  
Assistant Executive Officer

### Attachments:

Attachment 1 – Report of Central Coast Water Board Inspection on September 22, 2022

Attachment 2 – Photos and Figures Provided by Santa Cruz County

- Attachment 3 – Santa Cruz County Vector Inspection Authorization and Report Dated August 30, 2022.
- Attachment 4 – Requirement to Submit Report of Waste Discharge Dated May 20, 2022
- Attachment 5 – Notice of Violation for Failure to Submit Quarterly Monitoring reports dated May 31, 2022.

cc:

DeBerry, Bruce [bruce.deberry@cpuc.ca.gov](mailto:bruce.deberry@cpuc.ca.gov)  
Chavez, Moises [moises.chavez@cpuc.ca.gov](mailto:moises.chavez@cpuc.ca.gov)  
Matthew Machado, [matt.machado@santacruzcounty.us](mailto:matt.machado@santacruzcounty.us)  
Carolyn Burke [Carolyn.Burke@santacruzcounty.us](mailto:Carolyn.Burke@santacruzcounty.us)  
Kent Edler [Kent.Edler@santacruzcounty.us](mailto:Kent.Edler@santacruzcounty.us)  
David Reid, [David.Reid@santacruzcounty.us](mailto:David.Reid@santacruzcounty.us)  
Andrew Strader, [andrew.strader@santacruzcounty.us](mailto:andrew.strader@santacruzcounty.us)  
Jeff Heitzenrater, [Jeff.Heitzenrater@wildlife.ca.gov](mailto:Jeff.Heitzenrater@wildlife.ca.gov)  
Kristy Emershy, [Kristy.Emershy@wildlife.ca.gov](mailto:Kristy.Emershy@wildlife.ca.gov)  
Megan Indermill, [Megan.Indermill@Wildlife.ca.gov](mailto:Megan.Indermill@Wildlife.ca.gov)  
Mark Lemus, [Mark.Lemus@Waterboards.ca.gov](mailto:Mark.Lemus@Waterboards.ca.gov)  
Danial Woldearegay, [Danial.Woldearegay@Waterboards.ca.gov](mailto:Danial.Woldearegay@Waterboards.ca.gov)  
Jennifer Epp, [Jennifer.Epp@Waterboards.ca.gov](mailto:Jennifer.Epp@Waterboards.ca.gov)  
Thea Tryon, [Thea.Tryon@waterboards.ca.gov](mailto:Thea.Tryon@waterboards.ca.gov)  
Tamara Anderson, [Tamara.Anderson@waterboards.ca.gov](mailto:Tamara.Anderson@waterboards.ca.gov)  
Harvey Packard, [Harvey.Packard@waterboards.ca.gov](mailto:Harvey.Packard@waterboards.ca.gov)  
Jesse Woodard, [Jesse.Woodard@Waterboards.ca.gov](mailto:Jesse.Woodard@Waterboards.ca.gov)  
Todd Stanley, [Todd.Stanley@Waterboards.ca.gov](mailto:Todd.Stanley@Waterboards.ca.gov)  
Paul Ciccarelli, [Paul.Ciccarelli@Waterboards.ca.gov](mailto:Paul.Ciccarelli@Waterboards.ca.gov)  
WDR Program, [RB3-WDR@Waterboards.ca.gov](mailto:RB3-WDR@Waterboards.ca.gov)

ECM/CIWQS = 147027

GeoTracker No. = WDR100027894

Rev 7/26/2021

ECM Subject Name = Big Basin Woods Subdivision WWTP NOV

R:\RB3\Enforcement\Case Files\Big Basin WWTP\NOV\_Nov2022\Big Basin

NOV\_Final.docx

## INSPECTION REPORT WASTE DISCHARGE REQUIREMENTS UNIT

### OVERVIEW

**Facility Name:** Big Basin Woods Subdivision Wastewater Treatment Plant (WWTP)

**Facility Owner:** Thomas J (Jim) Moore, Big Basin Water Company, Inc. (Big Basin Water Company)

**Discharger Contact:** Jim Moore, Big Basin Water Company, [bbwater197@yahoo.com](mailto:bbwater197@yahoo.com)

**Address:** 16575 Jamison Creek Rd, Boulder Creek, CA 95006

**Wastewater Permit No.:** Individual Order No. 97-26, *Waste Discharge Requirements for Big Basin Water Company, Inc. Big Basin Woods Subdivision, Santa Cruz County* (Permit)

**Date:** September 22, 2022

**Time:** 10:00 AM – 11:15 AM

**Type of Inspection:** Routine Compliance

**Inspector(s):** Mark Lemus and Danial Woldearegay

**Discharger/Operators present:** Jim Moore

**Person/date when consent provided (facility access):** Jim Moore, September 22, 2022

**Consent for photos provided:** Yes

**Weather:** Sunny, 70°F

**Staff Contact Information:** [Mark.Lemus@waterboards.ca.gov](mailto:Mark.Lemus@waterboards.ca.gov), (805) 549-3703;  
[Danial.Woldearegay@waterboards.ca.gov](mailto:Danial.Woldearegay@waterboards.ca.gov), (805) 549-3892

**Date of Last Inspection(s):** June 1, 2005

### BACKGROUND

Central Coast Regional Water Quality Control Board (Central Coast Water Board) staff Mark Lemus and Danial Woldearegay conducted this inspection to investigate the claims of vector breeding and to obtain a status of the WWTP operations.

### SITE DESCRIPTION

The WWTP is located adjacent (west) to Highway 236 at Fallen Leaf Drive. The topography is significantly sloped, and residential homes are located west and uphill from the WWTP. According to the Permit, the WWTP is a package activated sludge plant with a designed capacity of 35,000 gallons per day (gpd), receiving at that time approximately 4,000 gpd and permitted for 7,000 gpd. The last submitted quarterly self-monitoring report (Quarter 2, 2019), reports average flows of approximately 1,100 gpd.

The package plant system is one continuous basin with a blower and diffusers to provide oxygen for aerobic treatment. The system is designed for treated wastewater to be pumped uphill to a leachfield for disposal located approximately one-half mile south and uphill of the WWTP.

An unnamed tributary is located approximately 200 feet south of the disposal area, and Jamison Creek lies approximately 600 feet north of the WWTP. Both of these surface water bodies are tributaries of Boulder Creek, which is located approximately 190 feet west and immediately across Highway 236. There was also a storm drain noted adjacent (north) of the WWTP.

## **INSPECTION, OBSERVATIONS, AND DISCUSSIONS**

Central Coast Water Board staff observed several lots at the subdivision undergoing various stages of construction. There were also several lots with recreational vehicles and portable toilets. Central Coast Water Board staff met with Jim Moore on Fallen Leaf Drive and followed Mr. Moore to the WWTP entrance, accessible via Hwy 236. Jim Moore allowed Central Coast Water Board staff to enter the facility and provided consent for pictures to be taken during the inspection. The WWTP area was fenced off; however, the chain link for one of the gates was pulled away from the post leaving a gap for potential unauthorized entry. The WWTP basins were filled nearly to the top with collected raw (untreated) wastewater. The WWTP contains an effluent box that appeared to be completely full. Because of the piled foliage, Central Coast Water Board staff were unable to observe any signs of previous spills from the system. Mr. Moore explained his situation had not changed since the last communications that he had with Central Coast Water Board staff, except for the installation of a new electrical drop. When questioned about pumping frequency, Mr. Moore mentioned that pumping occurred frequently but not on a weekly basis. Mr. Moore asked Central Coast Water Board staff if he is allowed to send existing untreated wastewater accumulated in the WWTP to the leachfields directly. Central Coast Water Board staff informed Mr. Moore that doing so would be a violation of his existing permit as bypass of untreated wastewater is not allowed. Based on the elevation of untreated wastewater in the basins throughout the WWTP, Central Coast Water Board staff observed that untreated wastewater is either not getting pumped out of the WWTP or it is getting pumped at an insufficient frequency.

The WWTP blower motor control panel showed signs of fire damage as did the associated aeration blower. None of the equipment could be tested for function due to lack of electricity. Mr. Moore stated he would need to run new conduit and wires to connect the equipment to test once he receives power.

Mr. Moore discussed his difficulty getting the necessary permits to bring electricity to his plant and there was a lack of funds necessary to replace aeration blower, associated motor control panel, and the effluent pump. Mr. Moore stated that with his current service rates he is unable to obtain the appropriate funding necessary to complete the

repairs of his system nor the pumping and hauling of the wastewater from his system on a regular basis.

Central Coast Water Board staff conveyed to Mr. Moore that the County Environmental Health Department reported that the basins had become mosquito larvae breeding habitat, to which Mr. Moore replied that the county vector control agency staff had met with him previously and conveyed no issues with his current operation practices.

Central Coast Water Board staff explained to Mr. Moore that the Central Coast Water Board issued a notice of violation to Big Basin Water Company on May 31, 2022, for missing self-monitoring reports and that according to the Central Coast Water Board's current records, no self-monitoring reports have been submitted since 2019. Mr. Moore responded by indicating he had never received such a notice. Mr. Moore said he would look through his records for any of the missing data from the periods stated on the notice of violation. Mr. Moore indicated that records related to missing self-monitoring reports were most likely lost due to fire damage. Mr. Moore indicated that he was not aware of weekly pumping requirements and does not have pumping records to submit. To date, no self-monitoring reports have been received since 2019.

Central Coast Water Board staff showed Mr. Moore a copy of Central Coast Water Board correspondence<sup>1</sup> from late 2021 and early 2022 requesting pumping records. Mr. Moore stated that he was unaware of the correspondence and would begin pumping regularly.

Central Coast Water Board staff followed Mr. Moore to the subsurface disposal area. Mr. Moore indicated that the existing leachfields were inactive and recent discharge of wastewater had not occurred. Central Coast Water Board staff observed no signs of recent discharge to the leachfields per observation of the leachfield dispersal boxes.

Mr. Moore stated that he'd continue to work on getting power at the WWTP and then determine what components of the WWTP are functioning or in need of repair/replacement.

## **CONCLUSIONS**

There was no standby generator on the site and there appears to be no efforts to connect the WWTP to a standby generator that would allow the WWTP to operate without electricity service to maintain Permit compliance.

The WWTP has been left inoperable and is essentially currently functioning as an open holding basin that has collected wastewater and has become a nuisance. County of Santa Cruz Environmental Health staff visited the site in August 2022 and reported big

---

<sup>1</sup> On November 22, 2021, Central Coast Water Board staff spoke to Jim Moore and sent a follow up email asking for several items including WWTP pumping records and the missing monitoring reports for 2020 and 2021. On Tuesday January 11, 2022, Central Coast Water Board staff sent a follow up email to Jim Moore stating that a response had not been received to the November 22, 2021 email and asking for a response.

stagnant basins of wastewater that had become concentrated mosquito larvae breeding habitat. Untreated wastewater has collected over an extended period of time and there appears to be no efforts to remove or treat wastewater. See attached photos.

The facility is in a status of disrepair and not a functioning system that can provide adequate wastewater treatment to be discharged to the environment. Mr. Moore has stated that there is not adequate funding to repair and replace equipment necessary to bring the WWTP into a condition where it can operate as intended and in compliance with regulatory requirements. It has been two years since the CZU complex fire and it appears no significant progress has been made on behalf of Big Basin Water Company to bring the facility into an operating condition and into compliance with appropriate regulatory requirements.

Against requests from Central Coast Water Board staff, Big Basin Water Company has not furnished any proof that wastewater has been pumped from the system on a regular frequency. The levels of wastewater present in the system during the inspection and the August 2022 visit from Santa Cruz County Environmental Health indicate that pumping has not occurred on a regular basis. This collected wastewater within the system is nearly overflowing the walls of the WWTP and has the potential to spill to nearby surface waters during the next significant seasonal precipitation event if no action is taken. It has been two years since the CZU complex fire and it appears no significant progress has been made on behalf of Big Basin Water Company to bring the facility into an operating condition and into compliance with appropriate regulatory requirements.

There are no safeguards in place to ensure compliance with the terms and conditions of this order.

To date, based on Central Coast Water Board records, the Big Basin Water Company has not submitted self-monitoring reports for the period listed on the May 31, 2022 notice of violation and has not submitted any records of septic hauling services to pump wastewater from the WWTP.

**MAPS AND FIGURES**



**Figure 1: Big Basin WWTP vicinity to nearby waterbodies**

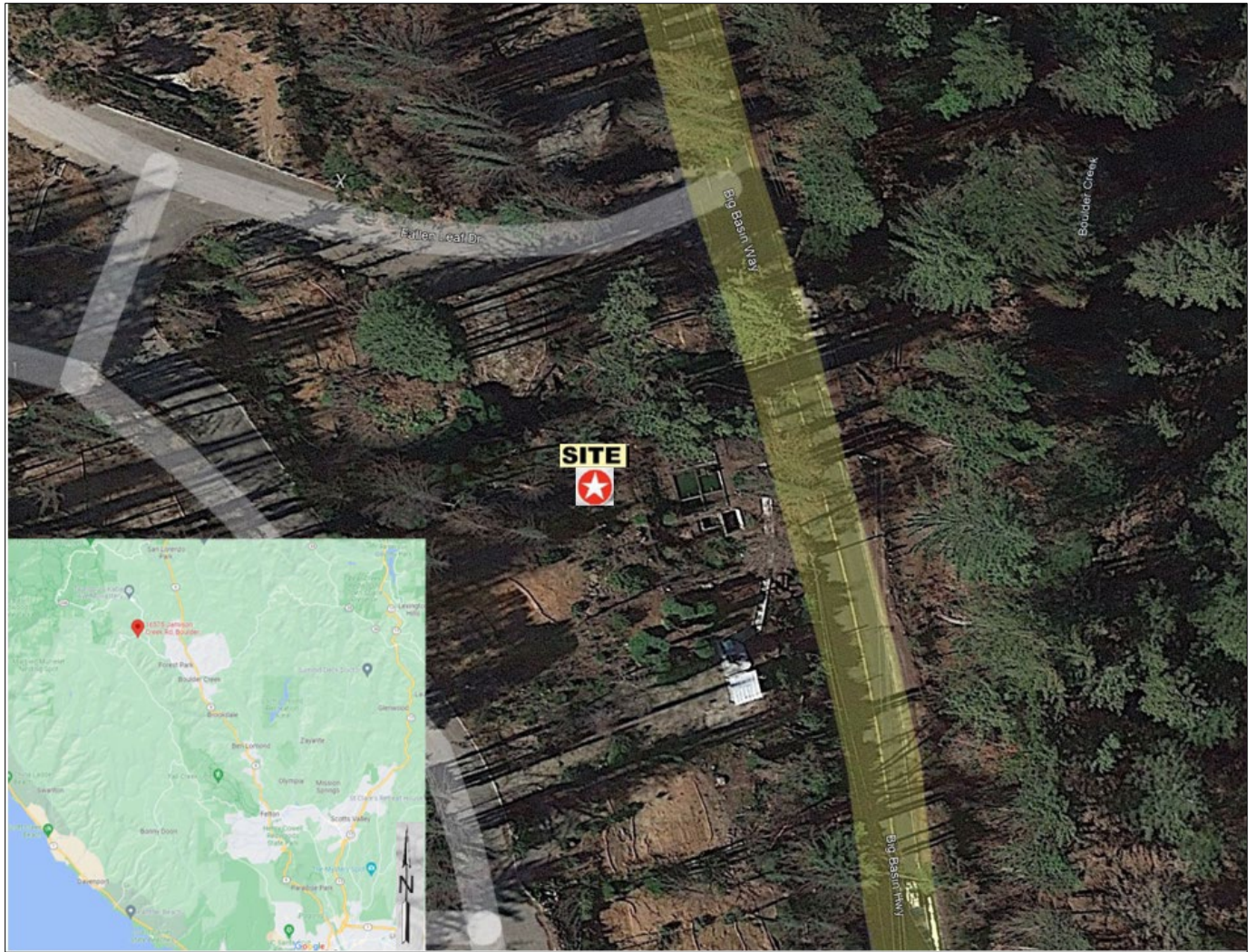


Figure 2: Big Basin WWTP site map





**Figure 3. Activated sludge basin acting as a holding basin for untreated domestic wastewater**



**Figure 4. Basin designed for treated effluent holding untreated wastewater over basin capacity**



**Figure 5. Existing Aerator motor impacted by fire damage**



**Figure 6. Existing pump impacted by fire damage**



**Figure 7. Inactive Leachfield disposal area**



**Figure 8. New incomplete electrical box**

\\ca.epa.local\rb\rb3\enforcement\case files\big basin wwtp\nov\_nov2022\attach  
1\_inspectionreport\_bigbasin.docx

**Attachment 2**  
**Big Basin Woods Subdivision WWTP Figures**



**Figure 1: Wastewater basin at full capacity with mosquito larvae buildup**  
**Photo taken by Sierra Ryan, Water Resources Manager, County of Santa Cruz County**  
**Environmental Health on August 26, 2022**



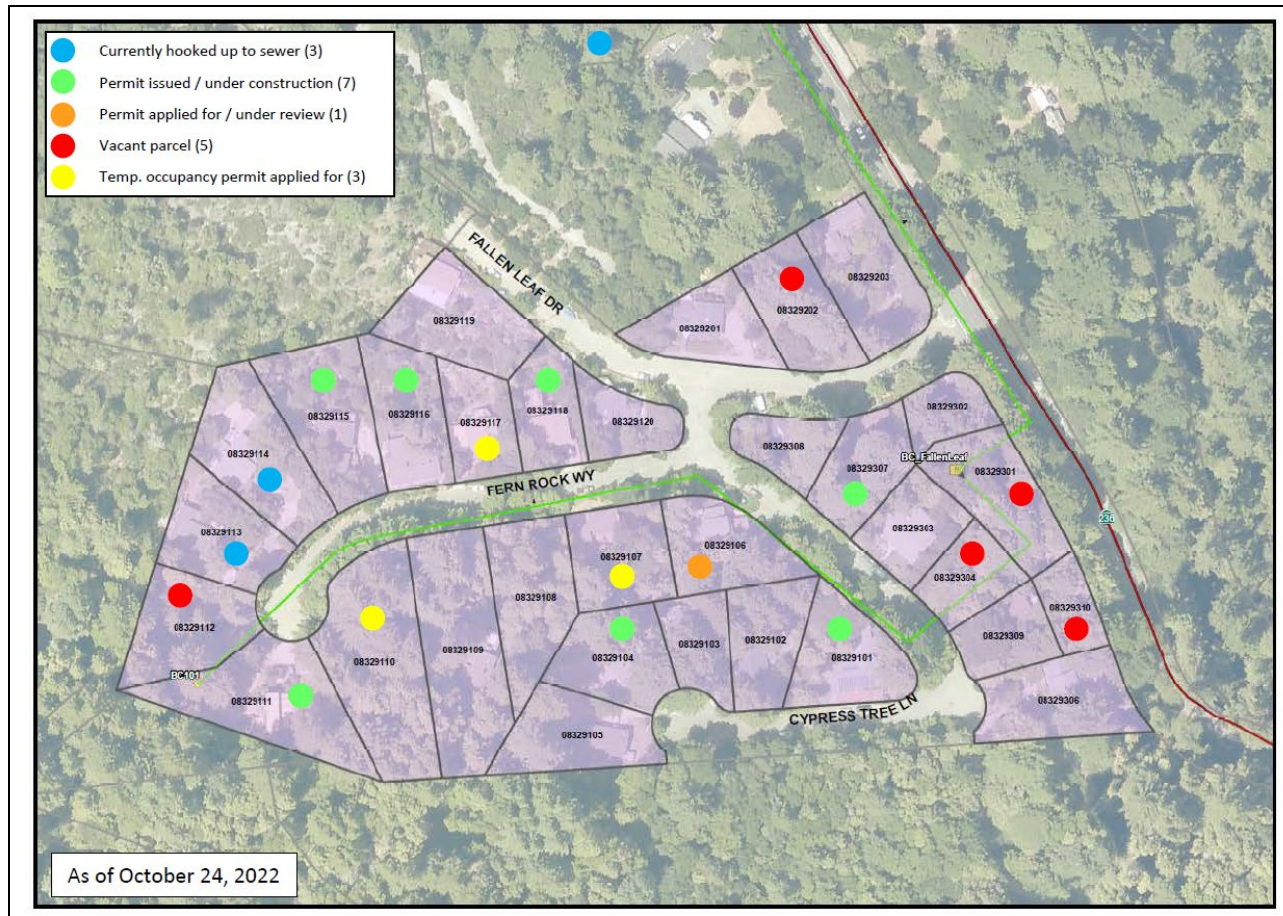
**Figure 2: Wastewater basin at full capacity before mosquito abatement**  
Photos taken by Sierra Ryan, Water Resources Manager, County of Santa Cruz County Environmental Health on August 26, 2022



**Figure 3: Wastewater basin at full capacity**  
Photos taken by Sierra Ryan, Water Resources Manager, County of Santa Cruz County Environmental Health on August 26, 2022



**Figure 4: Wastewater basin overflowing.**  
**Photos taken by Kent Edler, Assistant Director- Special Services, Santa Cruz County on September 9, 2021**



**Big Basin  
Parcels  
Tract 410**



0 50 100 Feet

2021-040  
Date: 10/28/2021

**Figure 5: Big Basin Subdivision WWTP service area  
Created and last revised by Santa Cruz County on October 24, 2022**



**Figure 6: Untreated wastewater overflowing basin**  
Photo taken by Kristy Emershy, California Department of Fish and Wildlife, Santa Cruz Harbor District on November 2, 2022



**Figure 7: Untreated wastewater overflowing basin**  
**Photo provided by Nader Sidhom, Vector Control Specialist, Santa Cruz County Mosquito and Vector Control and taken on October 27, 2022**





**Figure 8: Location of WWTP (shown by blue star) in relation to the unnamed ephemeral stream and Boulder Creek.**



# County of Santa Cruz



## Office of the Agricultural Commissioner

Mosquito and Vector Control CSA 53

640 Capitola Road, Santa Cruz, California 95062

(831) 454-2590 Fax (831) 464-9161 Internet [www.agdept.com](http://www.agdept.com)

Juan Hidalgo, Agricultural Commissioner Amanda Poulsen, M.S., Assistant Manager

Big Basin Water Company  
P.O. Box 197  
Boulder Creek, CA

Subject Property:  
APN: 083-293-01, Big Basin Way x Fallen Leaf Drive

## VECTOR INSPECTION AUTHORIZATION AND REPORT

Dear Mr. Moore,

On August 29, 2022, Santa Cruz County Mosquito & Vector Control were notified by Santa Cruz County Environmental Health of a mosquito issue at the Big Basin Water Company site (APN 083-293-01). Our inspection and subsequent treatments and follow-up actions are authorized under the California Health and Safety Code (Division 3, Chapter 1, Section 2053).

Mosquito & Vector Control staff confirmed dense breeding of *Culex* species mosquitoes which can transmit West Nile virus. The large quantities of mosquitoes produced by this wastewater treatment facility constituted a public health concern to the surrounding residents. An organic biological larvicide in granular form and a liquid mineral-oil were applied to the surface of the water to kill the mosquitoes. Follow-up actions were taken which included checking that there was successful larval knock-down post-treatment and trapping to capture adult mosquitoes for West Nile virus testing.

On August 30, 2022, Mosquito & Vector Control met with the property owner Jim Moore to discuss the mosquito breeding issue. The owners of this property should take all necessary actions to abate these conditions as required by the California Health and Safety Code (Division 3, Chapter 1, Section 2000, *et. seq.*) and/or Chapter 1.14 of the Santa Cruz County Code. It is recommended that the standing water be pumped and removed regularly. If the water cannot be removed, it is recommended that the Big Basin Water Company continuously circulate or aerate the water to prevent mosquito breeding within all chambers of the facility. Mosquito & Vector Control will continue to monitor the site throughout the transition to County Sewer.

Thank you,

  
Amanda Poulsen  
Assistant Vector Control Manager



---

## Central Coast Regional Water Quality Control Board

May 20, 2022

Big Basin Woods Subdivision  
Po Box 197  
Boulder Creek, CA 95006  
Email: [bbwater197@yahoo.com](mailto:bbwater197@yahoo.com)

**Sent Via Electronic Mail**

Dear Big Basin Woods Subdivision,

### **BIG BASIN WOODS SUBDIVISION, HWY 236 AND FALLEN LEAF DRIVE, BOULDER CREEK, SANTA CRUZ COUNTY – REQUIREMENT FOR NOTICE OF INTENT / REPORT OF WASTE DISCHARGE FOR DISCHARGES OF DOMESTIC WASTEWATER**

Big Basin Water Company is currently enrolled in Order No. 97-026, individual waste discharge requirements for discharges of domestic wastewater to land from the Big Basin Woods Subdivision (individual permit). On September 23, 2014, the State Water Quality Control Board adopted *Order WQ 2014-0153-DWQ, General Waste Discharge Requirements for Small Domestic Wastewater Treatment Systems (Small General Permit)* which provides regulatory coverage for wastewater systems with a monthly average flow rate of 100,000 gallons per day or less. Central Coast Regional Water Quality Control Board (Central Coast Water Board) staff reviewed the available documents associated with your wastewater system and determined that your facility would be more appropriately regulated under the Small General Permit.

A copy of the **Small General Permit** can be obtained at the following link:

[https://www.waterboards.ca.gov/centralcoast/board\\_decisions/adopted\\_orders/2014/2014%20small%20domestic%20GP.pdf](https://www.waterboards.ca.gov/centralcoast/board_decisions/adopted_orders/2014/2014%20small%20domestic%20GP.pdf)

### **REQUIREMENT FOR A NOTICE OF INTENT**

The Central Coast Water Board requires that the Big Basin Water Company submit a notice of intent serving as an application (also referred to as a report of waste discharge) for enrollment of Big Basin Water Company in the Small General Permit for discharges from the Big Basin Woods Subdivision by **June 20, 2022**.

The notice of intent must be completed electronically using the application form found at the following web location, under the heading “Permit Application to Discharge Less than 100,000 GPD of Domestic Wastewater (Central Coast Region)”:

[https://www.waterboards.ca.gov/centralcoast/water\\_issues/programs/wastewater\\_permi/ting/](https://www.waterboards.ca.gov/centralcoast/water_issues/programs/wastewater_permi/ting/)

The web location above also includes a link to the application questions and instructions on how to apply.

The Central Coast Water Board’s requirement that Big Basin Water Company submit a notice of intent is made pursuant to section 13260 of the California Water Code.

Once the Central Coast Water Board deem Big Basin Water Company’s application complete, the Central Coast Water Board will terminate the individual permit and issue a notice of applicability. Issuance of the notice of applicability authorizes coverage and enrollment of the Big Basin Water Company in the Small General Permit for discharges from the Big Basin Woods Subdivision. Big Basin Water Company must comply with the conditions of the Small General Permit upon receipt of the notice of applicability.

### **SUMMARY OF REGULATORY PERMIT COVERAGE**

The permit history for Big Basin Water Company’s, Big Basin Woods Subdivision, is provided in Table 1.

**Table 1:** Big Basin Woods Subdivision Permit History

<b>Order No.</b>	<b>Start Date</b>	<b>End Date</b>
Waste Discharge Requirements Order No. 97-026 for Big Basin Water Company	12/5/1997	Present <sup>1</sup>

<sup>1</sup>. Big Basin Water Company’s existing individual permit will be terminated upon the Central Coast Water Board’s issuance of a notice of applicability enrolling the wastewater facility into the Small General Permit.

### **PERMIT FEES**

No application fee is required, as Big Basin Water Company paid its annual fee on March 15, 2022 for coverage under the existing individual permit. Big Basin Water Company must continue to pay an annual fee to maintain permit coverage. The facility is currently assigned a threat and complexity rating of 3B which currently has an associated permit fee of \$3,743. Fees are charged (and updated) annually and are based on threat and complexity ratings, and the treatment technology employed. Threat and complexity ratings are defined in the fee schedule listed in California Code of Regulations, title 23, section 2200 and available at:

[https://www.waterboards.ca.gov/resources/fees/water\\_quality/#wdr](https://www.waterboards.ca.gov/resources/fees/water_quality/#wdr)

## LEGAL REQUIREMENTS

Pursuant to California Water Code section 13260, Big Basin Water Company must file a report of waste discharge (also referred to as a notice of intent) serving as an application for enrollment in the Small General Permit. Pursuant to California Water Code section 13261, failure to furnish a notice of intent by **June 20, 2022**, may subject Big Basin Water Company to administrative civil liability (monetary penalties) of up to \$1,000 for each day of violation. If the Central Coast Water Board imposes a penalty, the required information still needs to be submitted. The Central Coast Water Board reserves the right to take any enforcement action authorized by law.

The Central Coast Water Board recommends that Big Basin Water Company immediately review the Small General Permit and coordinate with the Central Coast Water Board to determine the site-specific effluent limitations for their treatment technology and underlying groundwater basin. For questions regarding this letter, please contact Central Coast Water Board staff **Danial Woldearegay at (805) 549-3892** or [Danial.Woldearegay@Waterboards.ca.gov](mailto:Danial.Woldearegay@Waterboards.ca.gov), or Jennifer Epp at (805) 594-6181.

Sincerely,

**Jennifer Epp**  Digitally signed by Jennifer Epp  
Date: 2022.05.20 12:37:54 -07'00'

*for* Matthew T. Keeling  
Executive Officer

cc:

Danial Woldearegay, [danial.woldearegay@waterboards.ca.gov](mailto:danial.woldearegay@waterboards.ca.gov)

Jennifer Epp, [Jennifer.Epp@Waterboards.ca.gov](mailto:Jennifer.Epp@Waterboards.ca.gov)

WDR Program, [RB3-WDR@Waterboards.ca.gov](mailto:RB3-WDR@Waterboards.ca.gov)

ECM/CIWQS = 209483

GeoTracker No. = WDR100027894

Rev 5/10/2022

ECM Subject Name = 13260 for Big Basin Woods Subdivision

R:\RB3\Shared\WDR\WDR Facilities\Santa Cruz Co\Big Basin Woods Subdiv\2022



---

## Central Coast Regional Water Quality Control Board

May 31, 2022

**Sent Via Certified Mail  
No. 7020 1810 0002 0768 2060**

Big Basin Water Company  
Big Basin Woods Subdivision  
16575 Jamison Creek Rd  
Boulder Creek, CA 95006

Dear Big Basin Water Company:

**BIG BASIN WOODS SUBDIVISION, HWY 236 AND FALLEN LEAF DRIVE, SANTA CRUZ COUNTY - NOTICE OF VIOLATION FOR FAILURE TO SUBMIT REPORTS REQUIRED BY WASTE DISCHARGE REQUIREMENTS ORDER NO. 97-026 FOR BIG BASIN WATER COMPANY –WDID 3 441001001**

The treatment and disposal of wastewater from the Big Basin Woods Subdivision located at Hwy 236 and Fallen Leaf Drive, Boulder Creek, California is regulated by the Central Coast Regional Water Quality Control Board (Central Coast Water Board). Big Basin Water Company is regulated by Waste Discharge Requirements Order No. 97-026 (Permit) and is responsible for complying with the requirements of the Permit. The Permit requires submittal of self-monitoring reports pursuant to the associated Monitoring and Reporting Program.

On August 5, 2019 we sent you a courtesy letter notifying you that you had failed to submit reports required by your permit.

You are receiving this notice of violation because Big Basin Water Company has repeatedly failed to submit quarterly and/or annual self-monitoring reports to the Central Coast Water Board, which is a violation of the monitoring and reporting requirements of the Permit. This notice of violation is to inform Big Basin Water Company of the alleged violations and to notify you of the associated administrative civil liability (monetary penalties) that accrues for each day of violation.

### **Alleged Violation**

Order No. 97-026 requires Big Basin Water Company to comply with the facility's current Monitoring and Reporting Program. The Monitoring and Reporting Program requires submittal of self-monitoring reports. Failing to submit a self-monitoring report is a violation of Order No. 97-026.

JANE GRAY, CHAIR | MATTHEW T. KEELING, EXECUTIVE OFFICER

A review of our records since January 30, 2017, shows that we have not received the following reports:

<b>Report Period</b>	<b>Due Date</b>
Quarterly Report for Q3 2019	10/20/2019
Quarterly Report for Q4 2019	1/20/2020
Quarterly Report for Q1 2020	4/20/2020
Quarterly Report for Q2 2020	7/20/2020
Quarterly Report for Q3 2020	10/20/2020
Quarterly Report for Q4 2020	1/20/2021
Quarterly Report for Q1 2021	4/20/2021
Quarterly Report for Q2 2021	7/20/2021
Quarterly Report for Q3 2021	10/20/2021
Quarterly Report for Q4 2021	1/20/2022

### **Legal Authority**

Failing to submit a self-monitoring report is a violation of California Water Code section 13267. Pursuant to Water Code section 13268, the Central Coast Water Board may impose administrative civil liability of up to \$1,000 per day for each day a violation occurs. Your potential administrative civil liability for failing to submit each report extends back to the original due date for each report and continues to accrue daily. If the Central Coast Water Board imposes a monetary penalty, the reports must still be submitted. The Central Coast Water Board reserves the right to take any enforcement action authorized by law.

### **Action Required**

Central Coast Water Board staff will not recommend further enforcement action if Big Basin Water Company submits all outstanding self-monitoring reports **no later than 30 days from the date of this letter**. Failure to comply with this courtesy deadline will subject Big Basin Water Company to enforcement action, including administrative civil liability, based on the original due date for each report that is late. If you find that some or all of the required data or information is unavailable for a given report, you must still submit the report and note where data or information are unavailable and why.

### **How to Submit the Report(s)**

You are required to submit all reports electronically in a searchable PDF format and email them to [centralcoast@waterboards.ca.gov](mailto:centralcoast@waterboards.ca.gov) using the transmittal sheet found at the link below as the cover page.

[https://www.waterboards.ca.gov/centralcoast/water\\_issues/programs/wastewater\\_permittng/docs/transmittal\\_sheet.pdf](https://www.waterboards.ca.gov/centralcoast/water_issues/programs/wastewater_permittng/docs/transmittal_sheet.pdf)

Annual monitoring reports must follow the format provided here:

[https://www.waterboards.ca.gov/centralcoast/board\\_decisions/adopted\\_orders/2020/wdr\\_annual\\_report\\_format.pdf](https://www.waterboards.ca.gov/centralcoast/board_decisions/adopted_orders/2020/wdr_annual_report_format.pdf)

You may combine multiple overdue reports in a single email as long as the total file size does not exceed 50 MB (if you send large files, please confirm with the staff person shown below that we have received your reports as some email systems have file size limitations). However, each report must be a separate PDF and contain its own transmittal sheet. All reports must be signed according to the criteria listed at the bottom of the transmittal sheet and must include the certification statement as shown on the transmittal sheet directly above the signature lines.

If you have any questions regarding this letter, or if you think this has reached you in error, please address [RB3-WDR@Waterboards.ca.gov](mailto:RB3-WDR@Waterboards.ca.gov) or Danial Woldearegay at [Danial.Woldearegay@Waterboards.ca.gov](mailto:Danial.Woldearegay@Waterboards.ca.gov).

Sincerely,

A handwritten signature in blue ink, appearing to read 'Thea S. Tryon'.

for Thea S. Tryon  
Assistant Executive Officer

ECM/CIWQS = CW-209483

Rev. 3/16/2022

<r:\rb3\shared\wdr\enforcement\2022 nov missing reports project\nov late reports template mailmerge.docx>