

City of Palo Alto

Public Works Department

June 11, 2008

Paul Dinapoli
West Coast Facilities Director
Communications and Power Industries, Inc.
P.O. Box 50750
Palo Alto, CA 94303-0750

Dear Mr. Dinapoli,

NOTICE OF NONCOMPLIANCE

Divisions

Administration
650.329.2373
650.329.2299 fax

Engineering
650.329.2151
650.329.2299 fax

Environmental
Compliance
650.329.2598
650.494.3531 fax

Equipment
Management
650.496.6922
650.496.6958 fax

Facilities
Management
650.496.6900
650.496.6958 fax

Operations
650.496.6974
650.852.9289 fax

Regional Water
Quality Control
650.329.2598
650.494.3531 fax

Communications and Power Industries, Inc. (CPI) has violated provisions contained in Discharge Permit number 06104 and Chapter 16.09 of the Palo Alto Municipal Code (PAMC). Specifically, CPI:

- 1) On May 19, 2008 released approximately 40 gallons of industrial wastewater to the storm drain system in violation of Palo Alto Municipal Code (PAMC) Section 16.09.106(a); and
- 2) Failed to report the May 19, 2008 storm drain release within 15 minutes of knowledge thereof in violation of PAMC Section 16.09.020 and Attachment 1, Part C.2.c of Discharge Permit number 06104; and
- 3) Failed to take immediate action to contain and cleanup the May 19, 2008 release of industrial wastewater to the storm drain system in violation of PAMC Section 16.09.020 and Attachment 1, Part C.2.c of Discharge Permit number 06104.
- 4) Failed to maintain in working order the high level alarm located within the containment curb surrounding process tanks TA10 and TA11 in violation of PAMC Section 16.09.020 and Attachment 1, Part D.4 of Discharge Permit number 06104. The failure of this alarm resulted in the discharge of industrial wastewater to the asphalt area at the back of CPI's building 2 which ultimately set the stage for the May 19, 2008 storm drain release.

CPI shall cease the discharge of industrial wastewater to the storm drain system. In addition, CPI shall comply with PAMC chapter 16.09 and Discharge Permit number 06104 requirements.

In response to the violations indicated above, the RWQCP is considering further enforcement action. We will be contacting you shortly about this.

If you have any questions, please contact James Stuart at 650-329-2292.

Sincerely,



Phil Bobel, Manager
Environmental Compliance Division

cc: Annette Walton, Stanford Land Management Company

Received

JUN 16 2008

Environmental Mgmt.

P.O.Box 10250
Palo Alto, CA 94303