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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA, and)
the STATE OF MINNESOTA)
)
Plaintiffs,)
)
v.)
)
SOUTHERN MINNESOTA BEET)
SUGAR COOPERATIVE)
)
Defendant)

Civil Action No.

COMPLAINT

The United States of America, by the authority of the Attorney General of the United States and through its undersigned attorneys, acting at the request of the United States Environmental Protection Agency (“EPA”), and the State of Minnesota, by authority of its Attorney General and on behalf of the Minnesota Pollution Control Agency (“MPCA”), file this complaint and allege as follows:

NATURE OF ACTION

1. This is a civil action for penalties, restitution, and injunctive relief brought against Defendant Southern Minnesota Beet Sugar Cooperative (“SMB”) pursuant to the Clean Water Act (“CWA”), 33 U.S.C. § 1251 *et seq.*, as amended.

JURISDICTION, VENUE, AUTHORITY, AND NOTICE

2. This Court has jurisdiction over the subject matter of this action pursuant to 28 U.S.C. §§ 1331, 1345, and 1355 and CWA Section 309(b), 33 U.S.C. § 1319(b). The State is a party to this action pursuant to CWA Section 309(e), 33 U.S.C. § 1319(e), and 28 U.S.C. § 1367(a).

1 such discharge will meet certain specific requirements of the CWA or such other conditions as
2 EPA determines necessary to carry out the provisions of the CWA. In addition, EPA may
3 prescribe conditions pertaining to test procedures, data and information collection, reporting, and
4 such other requirements as deemed appropriate by EPA.

5 14. CWA Section 402(b), 33 U.S.C. § 1342(b), provides that a state may establish and
6 administer its own permit program, and, after EPA authorizes the state's program, it may also
7 issue NPDES permits.

8 15. On June 30, 1974, pursuant to CWA Section 402(b), 33 U.S.C. § 1342(b), EPA
9 delegated the administration of the federal NPDES permit program to the State of Minnesota for
10 discharges into the navigable waters within its jurisdiction.

11 16. Minn. Stat. § 115.07 (2012) prohibits the operation of a disposal system, which is
12 a system for disposing of sewage, industrial waste and other wastes, and includes sewer systems
13 and treatment works, without a written permit from the MPCA.

14 17. Minn. R. 7001.1030 (2013) provides that "no person may discharge a pollutant
15 from a point source into the water of the state without obtaining a national pollutant discharge
16 elimination system permit from the agency."

17 18. Notwithstanding the delegation of NPDES permitting authority to a state under
18 CWA Section 402(b), 33 U.S.C. § 1342(b), EPA retains the authority to commence a civil action
19 for appropriate relief, including a permanent or temporary injunction, when any person violates,
20 among other things, CWA Section 301, 33 U.S.C. § 1311, or violates any of the terms or
21 conditions of a NPDES permit. 33 U.S.C. § 1319(b).

22 19. CWA Section 309(d), 33 U.S.C. § 1319(d), provides that any person who violates
23 Section 301 of the CWA, 33 U.S.C. § 1311, or who violates any condition or limitation of a
24 NPDES permit issued pursuant to Section 402 of the CWA, 33 U.S.C. § 1342, shall be subject to
25 the civil penalties not to exceed \$25,000 per day for each violation. The Civil Penalties Inflation
26 Act of 1990, 28 U.S.C. § 2461 *et seq.*, as amended by the Debt Collection Improvements Act of
27 1996, 31 U.S.C. § 3701 *et seq.*, requires EPA to periodically adjust its civil penalties for
28 inflation. On December 11, 2008, EPA adopted and revised regulations entitled "Adjustment of

1 Civil Monetary Penalties for Inflation,” 40 C.F.R. Part 19, to upwardly adjust the maximum civil
 2 penalty under the CWA. For each violation that occurs on and after January 13, 2009, penalties
 3 of up to \$37,500 per day may be assessed. 73 F.R. 75340 (December 11, 2008).

4 20. Minn. Stat. § 115.071 (2012) provides that “any person who violates any
 5 provision of this chapter . . . or of (1) any effluent standard and limitation or water quality
 6 standards, (2) any permit or term or condition thereof . . . shall forfeit and pay to the state a
 7 penalty, in an amount to be determined by the court, of not more than \$10,000 per day of
 8 violation . . .”

9 **GENERAL ALLEGATIONS**

10 **The Facility**

11 21. SMB is a farmer-owned cooperative that processes millions of tons of sugar beets
 12 grown annually by the member farmers into granulated sugars and other sugar products.

13 22. The Facility consists of 11 remote beet stockpile sites, where the beets are
 14 collected and stored until they are processed, and the Factory Site, where the beets are actually
 15 processed.

16 23. At all times relevant to this Complaint, the Factory Site included the processing
 17 plant, six wastewater storage ponds (“Ponds 1-6”), stormwater ponds, the Waste Water
 18 Treatment Plant (“WWTP”), and land application parcels.

19 24. The processing plant is where SMB processes the beets into granulated sugar and
 20 various other sugar products. The processing plant generates most of the wastewater at the
 21 Facility. The remainder of the wastewater is contaminated stormwater runoff.

22 25. SMB stores the wastewater in wastewater storage ponds prior to treatment at the
 23 on-site WWTP.

24 26. The stormwater ponds collect the stormwater runoff from the Facility. The
 25 stormwater collects in various ditches and then flows into the ponds. At all times relevant to this
 26 Complaint, the northernmost stormwater pond was commonly known as “Tanner’s Pond.”
 27
 28

1 27. SMB disposes of some of its treated and untreated wastewater through spray
 2 irrigation on adjacent land application parcels and some treated wastewater through surface
 3 water discharges.

4 28. SMB's spray irrigation and surface water discharges are governed by its NPDES
 5 Permit.

6 **SMB's NPDES/SDS Permit**

7 29. Under the authority of CWA Section 402(b), 33 U.S.C. § 1342(b), the State of
 8 Minnesota issued SMB NPDES/State Disposal System ("SDS") Permit MN0040665 on
 9 December 29, 2004 (the "Permit"). Among other things, the Permit establishes effluent limits and
 10 other limitations on discharges to surface water and land application parcels.

11 30. Although the expiration date of the Permit is listed as November 30, 2009, SMB
 12 submitted a timely permit renewal application prior to that date. Therefore, the Permit remains
 13 in effect pending MPCA's review of SMB's permit renewal application, in accordance with
 14 Permit Chapter 12, Section 17 and Minnesota Administrative Rule 7001.0160. The Permit has
 15 remained in effect at all relevant times to this Complaint.

16 31. All discharges of wastewater from the Facility are regulated by SMB's Permit.

17 32. Relevant to this Complaint are the Facility's four outfalls: SD001, SD009, SD003,
 18 and SD004. The Permit authorized discharges only through these outfalls.

19 33. Under its Permit, SMB may discharge only non-contact cooling water
 20 (uncontaminated wastewater) from SD001.

21 34. Under its Permit, SMB is authorized to discharge treated wastewater through
 22 outfall SD009 (formerly "SD005"), to County Ditch 45 ("CD 45"). CD 45 flows to Sacred Heart
 23 Creek and then to the Minnesota River.

24 35. Under its Permit, SMB is authorized to discharge treated wastewater from two of
 25 its land application parcels through outfalls SD003 and SD004 to County Ditch 37 ("CD 37").
 26 CD 37 flows to the West Fork of Beaver Creek and then to the Minnesota River.

27 36. The Permit does not allow SMB to discharge untreated wastewater to CD 37 or
 28 CD 45 at any time.

1 37. Chapter 12, Section 11.11 of the Permit contains freeboard storage limits for the
2 six wastewater storage ponds at the Facility. It requires SMB to maintain at least 2-feet
3 freeboard on all wastewater and wastewater containment dams at the facility, except that ponds 5
4 and 6 shall maintain 3-feet of freeboard.

5 38. Chapter 3, Section 2.1 of the Permit allows discharges of treated wastewater
6 through SD009 into CD 45 exclusively during the period between September 1 and March 31.
7 During this time, SMB is permitted to discharge at a rate of up to 3.5 cubic feet per second
8 (“cfs”).

9 39. The Limits and Monitoring Requirements of the Permit prohibit spray irrigation
10 from November 1 through March 31.

11 40. Chapter 9, Section 1.2 of the Permit prohibits stormwater discharges from the
12 Facility, except for the stormwater that SMB treats at its wastewater treatment plant and
13 discharges through SD009. Chapter 9, Section 2.1 defines “stormwater” as “stormwater runoff,
14 snow melt runoff, and surface runoff and drainage.”

15 41. Chapter 12, Section 11.2 of the Permit requires SMB to ensure system reliability
16 at Tanner’s Pond and requires the “install[ation] of adequate backup or support system to achieve
17 permit compliance and prevent the discharge of untreated or inadequately treated waste. These
18 systems may include alternative power sources, in-line monitoring devices, auxiliary treatment
19 works and sufficient storage volume for untreated wastes.”

20 42. The Limits and Monitoring Requirements of the Permit require SMB to limit the
21 daily maximum discharge of carbonaceous biochemical oxygen demand (“CBOD”) to 25 mg/L
22 at SD003 and SD004.

23 43. The Limits and Monitoring Requirements of the Permit require SMB to limit the
24 calendar month maximum discharge of fecal coliform (“Fecal Coliform, MPN or Membrane
25 Filter 44.5C”) to 400 CFU/100 ml at SD009 for September and October.

26 44. The Limits and Monitoring Requirements of the Permit requires SMB to limit the
27 calendar month average for total chloride to 230 mg/l at SD009.
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CLAIMS FOR RELIEF

FIRST CLAIM FOR RELIEF

(Violations of Permit Freeboard Limits)

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4 45. Plaintiffs reallege and incorporate by reference Paragraphs 1-44 as if fully set
5 forth herein.

6 46. Between March 30, 2010 and June 5, 2010, SMB stored water in excess of
7 freeboard limits in Ponds 1, 2, and/or 3 on at least 61 separate days, in violation of Chapter 12,
8 Section 11.11 of the Permit.

9 47. Between March 30, 2010 and July 15, 2010, SMB stored water in excess of
10 freeboard limits in Ponds 5 and 6 on at least 97 separate days, in violation of Chapter 12,
11 Section 11.11 of the Permit.

12 48. SMB also stored water in excess of freeboard limits in Pond 2 on November 6,
13 2009; Pond 1 on September 23, 2010; Pond 3 on July 1, 2011; and in Ponds 5 and 6 on
14 March 31, 2011, in violation of Chapter 12, Section 11.11 of the Permit.

15 49. Each one of SMB's permit violations constitutes a violation of the CWA.

16 50. Each violation of the Permit is subject to penalties pursuant to Section 309(d) of
17 the CWA, 33 U.S.C. § 1319(d), and the Civil Penalties Inflation Act of 1990, of up to \$37,500
18 per day for each violation on and after January 13, 2009.

19 51. Each violation of the Permit is subject to penalties under Minn. Stat. § 115.071 of
20 up to \$10,000 per day.

21 **SECOND CLAIM FOR RELIEF**

22 **(Discharges outside the Permitted Time Period)**

23 52. Plaintiffs reallege and incorporate by reference Paragraphs 1-44 as if fully set
24 forth herein.

25 53. In April 2010, SMB discharged treated wastewater through SD009 on 25 separate
26 days outside the permitted period, in violation of Chapter 3, Section 2.1 of the Permit.

27 54. Each one of SMB's permit violations constitutes a violation of the CWA.
28

1 85. Each violation of the Permit is subject to penalties pursuant to Section 309(d) of
2 the CWA, 33 U.S.C. § 1319(d), and the Civil Penalties Inflation Act of 1990, of up to \$37,500
3 per day for each violation on and after January 13, 2009.

4 86. Each violation of the Permit is subject to penalties under Minn. Stat. § 115.071 of
5 up to \$10,000 per day.

6 **EIGHTH CLAIM FOR RELIEF**

7 **(Discharge of Untreated Wastewater through SD001)**

8 87. Plaintiffs reallege and incorporate by reference Paragraphs 1-44 as if fully set
9 forth herein.

10 88. On August 13, 2013, SMB discharged untreated wastewater to County Ditch 37
11 through SD001 in violation of its Permit.

12 89. Because County Ditch 37 flows to the West Fork of Beaver Creek, untreated
13 wastewater flowed into Beaver Creek.

14 90. As a result of this discharge, natural resources of the state were damaged,
15 including thousands of fish that were killed.

16 91. This permit violation constitutes a violation of the CWA.

17 92. This violation of the Permit is subject to penalties pursuant to Section 309(d) of
18 the CWA, 33 U.S.C. § 1319(d), and the Civil Penalties Inflation Act of 1990, of up to \$37,500
19 per day for each violation on and after January 13, 2009.

20 93. Each violation of the Permit is subject to penalties under Minn. Stat. § 115.071 of
21 up to \$10,000 per day.

22 94. The state is authorized to recover natural resource damages arising out of a
23 violation under Minn. Stat. § 115.071.

24 **PRAYER FOR RELIEF**

25 WHEREFORE, based upon all of the allegations set forth above, the United States of
26 America and the State of Minnesota respectfully request that this Court:
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ANDREW M. LUGER
United States Attorney
District of Minnesota



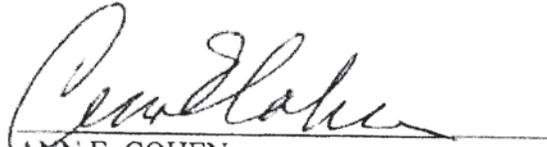
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FOR THE STATE OF MINNESOTA:



ANN E. COHEN
Assistant Attorney General
State of Minnesota
Atty. No. 0166777

JS 44 (Rev 12/12)

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

| | |
|---|--|
| <p>I. (a) PLAINTIFFS United States of America and the State of Minnesota</p> <p>(b) County of Residence of First Listed Plaintiff _____ <i>(EXCEPT IN U.S. PLAINTIFF CASES)</i></p> <p>(c) Attorneys (Firm Name, Address, and Telephone Number) See attachment</p> | <p>DEFENDANTS Southern Minnesota Beet Sugar Cooperative</p> <p>County of Residence of First Listed Defendant <u>Renville County</u> <i>(IN U.S. PLAINTIFF CASES ONLY)</i></p> <p>NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.</p> <p>Attorneys (If Known) Michael R. Drysdale, Dorsey & Whitney, LLP Suite 1500, 50 South Sixth Street, Minneapolis, MN 55402 Tel:(612) 340-5652</p> |
|---|--|

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|--|--|----------------------------|---------|---------|----------------------------|----------------------------|----------------------------|---|--|--|--------------------------|----------------------------|----------------------------|----------------------------|----------------------------|----------------------------|---|--|--|---|----------------------------|----------------------------|----------------------------|----------------------------|----------------------------|----------------|--|--|
| <p>II. BASIS OF JURISDICTION (Place an "X" in One Box Only)</p> <p><input checked="" type="checkbox"/> 1 U.S. Government Plaintiff</p> <p><input type="checkbox"/> 2 U.S. Government Defendant</p> <p><input type="checkbox"/> 3 Federal Question (U.S. Government Not a Party)</p> <p><input type="checkbox"/> 4 Diversity (Indicate Citizenship of Parties in Item III)</p> | <p>III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)</p> <table style="width:100%;"> <tr> <td style="width:33%;">Citizen of This State</td> <td style="width:33%;">PTF DEF</td> <td style="width:33%;">PTF DEF</td> </tr> <tr> <td><input type="checkbox"/> 1</td> <td><input type="checkbox"/> 1</td> <td><input type="checkbox"/> 4</td> </tr> <tr> <td colspan="3" style="text-align: center;">Incorporated or Principal Place of Business In This State</td> </tr> <tr> <td>Citizen of Another State</td> <td><input type="checkbox"/> 2</td> <td><input type="checkbox"/> 5</td> </tr> <tr> <td><input type="checkbox"/> 2</td> <td><input type="checkbox"/> 2</td> <td><input type="checkbox"/> 5</td> </tr> <tr> <td colspan="3" style="text-align: center;">Incorporated and Principal Place of Business In Another State</td> </tr> <tr> <td>Citizen or Subject of a Foreign Country</td> <td><input type="checkbox"/> 3</td> <td><input type="checkbox"/> 6</td> </tr> <tr> <td><input type="checkbox"/> 3</td> <td><input type="checkbox"/> 3</td> <td><input type="checkbox"/> 6</td> </tr> <tr> <td colspan="3" style="text-align: center;">Foreign Nation</td> </tr> </table> | Citizen of This State | PTF DEF | PTF DEF | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | <input type="checkbox"/> 4 | Incorporated or Principal Place of Business In This State | | | Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 5 | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | <input type="checkbox"/> 5 | Incorporated and Principal Place of Business In Another State | | | Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 6 | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | <input type="checkbox"/> 6 | Foreign Nation | | |
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| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 5 | | | | | | | | | | | | | | | | | | | | | | | | | | |
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| Incorporated and Principal Place of Business In Another State | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 6 | | | | | | | | | | | | | | | | | | | | | | | | | | |
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| Foreign Nation | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

IV. NATURE OF SUIT (Place an "X" in One Box Only)

| | | | | | |
|---|--|--|---|---|---|
| CONTRACT | TORTS | FORFEITURE/PENALTY | BANKRUPTCY | OTHER STATUTES | |
| <input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise | PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice | PERSONAL INJURY <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability | <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions | <input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609 | <input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input checked="" type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes |
| REAL PROPERTY | CIVIL RIGHTS | PRISONER PETITIONS | | | |
| <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property | <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education | Habeas Corpus: <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty Other: <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement | | | |

V. ORIGIN (Place an "X" in One Box Only)

1 Original Proceeding 2 Removed from State Court 3 Remanded from Appellate Court 4 Reinstated or Reopened 5 Transferred from Another District (specify) 6 Multidistrict Litigation

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):
The Clean Water Act ("CWA"), 33 U.S.C. 1251 et seq.

Brief description of cause:
This is a civil action for penalties, restitution, and injunctive relief brought against Defendant pursuant to the CWA.

VII. REQUESTED IN COMPLAINT: CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P. DEMAND \$ _____ CHECK YES only if demanded in complaint: JURY DEMAND: Yes No

VIII. RELATED CASE(S) IF ANY (See instructions): JUDGE _____ DOCKET NUMBER _____

DATE 5/5/16 SIGNATURE OF ATTORNEY OF RECORD Friedrich A.P. Gehret

FOR OFFICE USE ONLY: RECEIPT # _____ AMOUNT _____ APPLYING IFP _____ JUDGE _____ MAG. JUDGE _____

Attachment to Civil Cover Sheet

I.(c) Attorneys for Plaintiffs:

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