



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street

San Francisco, CA 94105-3901

SEP 30 2003

*Cont 7000520002161079558*

James F. Stahl  
Chief Engineer and General Manager  
County Sanitation Districts of Los Angeles County  
PO Box 4998  
Whittier, CA 90607-4998

Dear Mr. Stahl:

Enclosed is a Finding of Violation and Order for Compliance that requires the County Sanitation Districts of Los Angeles County to take measures to reduce the number of sewage spills from its collection system. The Order for Compliance sets forth a series of actions to be conducted and plans that must be prepared and implemented with required time lines.

The U.S. Environmental Protection Agency, Region 9 (EPA) has reviewed spill data for the last five years, from files provided by the Los Angeles Regional Water Quality Control Board and from your response to our July 2001 request for information related to your sanitary sewer collection system. Based on findings from our evaluation of this information, I am issuing the enclosed Finding of Violation and Order for Compliance.

EPA is aware the County Sanitation Districts of Los Angeles County has operations and maintenance programs in place for its collection system. The Order requires the Districts to examine your programs and to identify improvements necessary to reduce the number and volume of spills.

Please contact Dave Basinger of my staff at (415) 972-3506 with questions of a technical nature.

Sincerely,

Alexis Strauss  
Director  
Water Division

*30 Sept. 2003*

enclosures

cc: Dennis Dickerson, EO, RWQCB, Los Angeles  
Harold Singer, EO, RWQCB, Lahontan

*Hawthorne  
Revised  
10.7.03  
(Copy to Phil Farris)*

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J.F. STAHL  
Stephen R. Maguin

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX

IN THE MATTER OF: ) Docket No. CWA-402-9-03-31  
)  
COUNTY SANITATION DISTRICTS OF LOS ) **FINDINGS OF VIOLATION**  
ANGELES COUNTY ) **AND**  
) **ORDER FOR COMPLIANCE**  
Proceeding under Sections 308(a) and 309(a) of )  
the Clean Water Act )  
)  
)

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**STATUTORY AUTHORITY**

The following Findings are made and Order issued under authority vested in the Administrator of the United States Environmental Protection Agency ("EPA") under sections 308(a) and 309(a) of the Clean Water Act, as amended ("CWA"), 33 U.S.C. §§ 1318(a), 1319(a). This authority has been delegated to the Regional Administrator of EPA, Region 9, and re-delegated by the Regional Administrator to the Director, Water Division ("Director"). Notice of this action has been given to the State of California Regional Water Quality Control Board, Los Angeles and Lahontan Regions (Regional Board).

**FINDINGS OF VIOLATION**

The director finds:

1. Under section 301(a) of the CWA, 33 U.S.C. § 1311(a), it is unlawful for any person to discharge any pollutant from a point source into "navigable waters" except in compliance with a permit issued under the CWA. Under section 402 of the CWA, EPA or the State of California, Regional Water Quality Control Board issues National Pollutant Discharge Elimination System permits ("NPDES permits") for the discharge of pollutants into navigable waters located within the State of California.
2. Pollutants include sanitary sewage. 33 U.S.C. § 1362(6). A point source is any confined and

discrete conveyance, including a pipe or other conduit. 33 U.S.C. § 1362(14). Navigable waters are defined as “waters of the United States,” which include all waters used in interstate commerce, including tidal waters and all their tributaries. 33 U.S.C. § 1362(7); 40 C.F.R. §§ 122.3, 230.3(s).

3. County Sanitation Districts of Los Angeles County (CSDLAC, or “Districts”) is a special district incorporated by the State of California and as such is a municipality under section 502(5) of the CWA 33 U.S.C. § 1362(5).
4. County Sanitation Districts of Los Angeles County (CSDLAC, or “Districts”) is a confederation of twenty-five (25) separate Districts joined together under a Joint Administration Agreement with one administrative staff. The Districts operate a separate sanitary sewage collection system that collects sanitary sewage and conveys this sewage for treatment at various wastewater treatment facilities (this system hereinafter is collectively referred to as “the sewage collection system” or “the collection system”). The Districts’ collection system includes forty-nine (49) pumping stations and approximately 1,300 miles of main sewer lines (trunk sewers) which connect to local sewers. Local sewers are the responsibility of each individual city; the Districts operate and maintain the trunk sewers. The Districts’ service area covers nearly 800 square miles and encompasses seventy-eight (78) cities and unincorporated territory within the County. The Districts operate eleven (11) wastewater treatment facilities with a combined daily flow of approximately five hundred and forty (540) million gallons. Seven of the facilities (the Joint Water Pollution Control Plant or JWPCP, La Cañada Water Reclamation Plant or WRP, Whittier Narrows WRP, San Jose Creek WRP, Pomona WRP, Los Coyotes WRP, and Long Beach WRP) are located in the metropolitan area of Los Angeles County and compromise the Joint Outfall System. A regional system comprised of two wastewater treatment facilities (Valencia WRP and Saugus WRP) operates in the Santa Clarita Valley and two independent treatment facilities (Palmdale WRP and Lancaster WRP) operate in the Antelope Valley.
5. The Regional Board has issued the following NPDES Permits to the Districts authorizing discharge of treated wastewater from various wastewater treatment facilities:
  - NPDES No. CA 0053813, Order No. 97-090, Joint Water Pollution Control Plant (JWPCP)
  - NPDES No. CA 0053716, Order No. R4-2002-0142, Whittier Water Reclamation Plant (WRP)
  - NPDES No. CA 0053911, Order No. 95-079, San Jose Creek WRP
  - NPDES No. CA 0053619, Order No. 95-078, Pomona WRP
  - NPDES No. CA 0054119, Order No. R4-2002-0121, Los Coyotes WRP
  - NPDES No. CA 0054119, Order No. R4-2002-0123, Long Beach WRP
  - NPDES No. CA 0054216, Order No. 95-081, Valencia WRP
  - NPDES No. CA 0054313, Order No. 95-080, Saugus WRP
  - Palmdale WRP
  - Lancaster WRP

6. On May 18, 2001, the California Regional Water Quality Control Board, Los Angeles Region, issued Administrative Civil Liability (ACL) Complaint No. 00-171, against the County Sanitation Districts of Los Angeles County penalizing the City \$89,690 for four (4) sewage spills between January 1, 1999 and December 31, 2000. Three of these spills are included in Attachment 1.
7. In Appendix K of the Districts' response dated September 21, 2001, to the EPA's Section 308 Request for Information CWA-308-IX-FY01-29, the table entitled "Collection System Spill Chronology for period 7/1/96 to 6/30/01" provides a listing of sewage spills from sewer pipes and pump stations owned and operated by the Districts. For spills between July 1, 2001 and August 22, 2003, spill reports submitted by the Districts to the Regional Board have been provided by the Regional Board.
8. During the period from October 1, 1998 through August 22, 2003, the Districts reported thirty-five (35) sewage spills from portions of the sewage collection system owned and operated by the Districts. The Districts reported three (3) spills between October 1 and December 31, 1998; nine (9) spills in calendar year 1999; four (4) spills in calendar year 2000; eight (8) spills in calendar year 2001; three (3) spills in calendar year 2002; and eight (8) spills between January 1 and August 22, 2003.
9. Between October 1, 1998 and August 22, 2003, the Districts reported that twenty-seven (27) of the thirty-five (35) sewage spills from its collection system were to waters of the U.S. A list of sewage spills to waters of the U.S. by the Districts is included as Attachment 1 and made a part of this Finding of Violation. Each of the twenty-seven (27) sewage spills listed in Attachment 1 was a discharge of pollutants from a point source to waters of the United States.
10. County Sanitation Districts of Los Angeles County, on twenty-seven (27) occasions, as set forth in Paragraph 8 above, discharged pollutants from a point source to waters of the United States without authorization of an NPDES permit and thus is in violation of section 301(a) of the CWA.
11. County Sanitation Districts of Los Angeles County, on an additional eight (8) occasions, reported pollutant discharges which did not reach waters of the United States; while these discharges may have violated other specific permit conditions or regulations, these have not been cited as discharges to waters of the U.S. in this Order.

Considering the foregoing Findings and the potential environmental and human health effects of the violations, EPA has determined that compliance in accordance with the following requirements is reasonable. Pursuant to the authority of sections 308(a) and 309(a) of the CWA, it is hereby ORDERED:

## ORDER

County Sanitation Districts of Los Angeles County shall implement a Sewage Spill Reduction Action Plan (SSRAP) that includes the following components for reducing and eliminating sewage spills from the Districts' wastewater collection system. Each component plan of the SSRAP required in paragraphs I. to IV. of this Order is subject to review and approval by EPA as specified in paragraph V. of this Order. The Districts shall continue to implement its current program for controlling sewage spills, and shall take steps immediately to begin implementing improvements to its current program that are consistent with the requirements below.

### **I. IMMEDIATE REDUCTION OF COLLECTION SYSTEM SPILLS**

- A. Full compliance with the CWA requires that there be no discharge of wastewater from the collection system to waters of the U.S.. To ensure continuous improvement in spill reduction performance, as an interim standard, the Districts shall, each year, consistently and substantially reduce the frequency and volume of sanitary sewage spills to waters of the U.S..
- B. Compliance with the reduction in spills specified by the preceding paragraph shall not, however, constitute full compliance with the CWA. Only elimination of all overflows and spills to waters of the United States shall constitute full compliance.
- C. If, during any year, the Districts fail to meet the interim standard in Paragraph I.A, the annual report required pursuant to Paragraph VII shall describe actions the Districts plan to undertake in order to further eliminate spills and comply with the interim standard in Paragraph I.A. and set forth numeric spill reduction goals for three subsequent years.

### **II. SPILL RESPONSE**

- A. **Sanitary Sewer Overflow Response Plan:** By March 1, 2004, the Districts shall submit to EPA a Sanitary Sewer Overflow Response Plan. The plan shall include measures for containing spilled sewage, establishment of interim system operations, and timely repair and restoration of normal operations. The plan shall include a list of necessary spare parts and emergency equipment.

### **III. CONTROL OF NON-CAPACITY RELATED SPILLS**

- A. **Sewer System Cleaning and Root Control Program:**
  - 1. By March 1, 2004, the Districts shall submit a plan to EPA describing its Sewer System Cleaning and Root Control Program. The program must be sufficient to eliminate or reduce blockage related spills and shall include each of the following

elements:

- a. A schedule for periodic cleaning of the entire sewage collection system.
  - b. A hot spot cleaning schedule for more frequent cleaning of sections of the collection system known to be in poor condition or prone to blockage by roots, grease or debris. The plan shall identify all pipe sections in the hot spot cleaning program and describe procedures for adding or deleting pipe sections from the hot spot list.
  - c. A comprehensive plan for controlling intrusion and blockage of sewer pipes by roots. In developing the root control portion of the plan, the Districts shall consider all options for controlling roots including sewer pipe cleaning and rodding; chemical treatment; control of roots in private laterals; and repair, rehabilitation, or replacement of sewer pipes prone to root blockage.
2. By September 1 of each year, the Districts shall submit an annual report to EPA documenting activities of the Districts' sewer cleaning and root control program during the previous year including miles of pipe cleaned as part of the routine and hot spot cleaning programs, and miles of pipe treated by each method used for controlling roots. The Districts shall include a description of the success of the sewer cleaning and root control program at preventing blockages and sewage overflows and any changes to be made in the program to further reduce spills.
- B. Maintenance Management System:** By March 1, 2004 the Districts shall certify that they have a computerized sewer maintenance management system (MMS) capable of scheduling and tracking completion of sewer and pump station cleaning, maintenance and repairs. The MMS shall be linked to the Districts' Geographic Information System (GIS) map of the sewage collection system.
- C. Sewer Pipe Inspection and Condition Assessment:**
1. By March 1, 2004 the Districts shall submit a plan to EPA for periodic inspection and assessment of the condition of gravity sewers and maintenance holes in the Districts' collection system. The inspection and condition assessment program shall be sufficient to assess the condition of pipes following blockage related spills, identify pipes in need of emergency repair and to identify pipes in need of rehabilitation or replacement.
    - a. Inspection methods to be used, including direct visual inspection and CCTV inspection, and whether the Districts will purchase, lease, or contract for CCTV inspection equipment;

- b. An inspection schedule including an estimate of how many maintenance holes and miles of pipe will be inspected each year for the next 5 years; and
  - c. A system for timely evaluation of inspection findings and documentation of the assessed condition.
2. By September 1 of each year, the Districts shall submit an annual report to EPA summarizing the findings of the sewer pipe condition assessments conducted during the previous year and the miles of sewer pipe and number of maintenance holes planned to be inspected during the current fiscal year. The report shall indicate the inspection methods used.

**D. Sewer Repair, Rehabilitation and Replacement**

1. The Districts shall submit to EPA by March 1, 2004 a Plan including schedules and financial plan, for both short-term (repairs of acute defects to occur within one year of inspection and assessment completed) and long-term repair, rehabilitation and replacement of sewer pipes. The plan shall be sufficient to: 1) ensure timely repair of sewer pipes in imminent danger of failure or blockage; 2) ensure the long range sustainable replacement of obsolete assets; and 3) improve system performance and reduce spills caused by pipe defects. The plan shall include:
  - a. An estimate of how many sewer pipes annually will undergo emergency repair or replacement;
  - b. An estimate of how many miles of sewer pipe will be rehabilitated or replaced over the next 10 years and identification of the pipe reaches that will be rehabilitated or replaced in the next 5 years; and
  - c. A 10-year financial plan for short-term and long-term repair, rehabilitation, and replacement of sewer pipes.
2. By September 1 of each year, the Districts shall submit an annual report to EPA documenting sewer repair, rehabilitation or replacement activities completed in the previous year; describing projects to be completed in the coming year; and providing an updated 10-year Capital Improvement Plan (CIP).

**E. Pump Station Maintenance and Inventory**

1. The Districts shall complete a study of the condition of each pump station and associated force mains in the District's collection system and submit a report to EPA documenting the findings and recommendations by September 1, 2004. At a minimum the evaluation shall:

- a. Identify problems that resulted in recent overflows from pump stations and assess the potential of similar problems occurring at other pump stations in system;
  - b. Provide recommendations for standby generators and alarm systems as needed; and
  - c. Describe any other conditions that may affect the continuous operation of each pump station.
2. By March 1, 2005, the Districts shall submit a plan, including a schedule and financial plan, for completing all repairs, renovations, and upgrades necessary to ensure continuous operation of each pump station.
  3. The Districts shall revise its Sanitary Sewer Overflow Response Plan to include information found during study of the pump station. The Districts shall include in its Sanitary Sewer Overflow Prevention Plan monthly on-load checks of each pump station standby generator.

**F. Fats, Oils & Grease (FOG) Blockage Control Plan**

1. By March 1, 2004 the Districts shall submit a plan, including a schedule for implementation, to EPA describing a program for controlling sources of FOG entering the County's sewage collection system. The program shall be sufficient to eliminate or significantly reduce sewage spills caused by FOG blockage. At a minimum the program shall include:
  - a. Cleaning of sewer pipes prone to FOG blockage;
  - b. Requirements for Food Service Establishments (FSEs) to implement control measures as needed to minimize the discharge of FOG to the sewage collection system;
  - c. Requirements, as needed, for new and remodeled FSEs to install and operate properly sized grease interceptors;
2. By September 1 of each year, the Districts shall submit an annual report to EPA documenting the activities carried out under the FOG Blockage Control Program during the previous year and including copies of the FSE inspection and enforcement log for that year.

**IV. COLLECTION SYSTEM CAPACITY ASSURANCE**

## A. Capacity Assessment

1. Beginning in December 2003, the Districts shall assess wet weather flow levels and available capacity in the sewage collection system during the 2003/04 and 2004/05 rainy seasons. The assessment shall include:
  - a. Examination of flow meter charts at pump stations;
  - b. Visual observation of flow levels at critical maintenance holes during rain storms;
  - c. Identification of inflow sources contributing excess flow to the sewage collection system; and
  - d. Identification of any parts of the collection system that do not have sufficient capacity to convey sewage flows during wet weather.
2. In the annual report due September 1, 2004 the Districts shall report to EPA on the methods being used and preliminary findings of the wet weather flow capacity assessment required by paragraph IV. A.1. of this Order.

## B. Capacity Assurance Plan:

1. By December 1, 2004 the Districts shall control all known significant sources of inflow to the sewage collection system that pose a risk of exceeding collection system capacity.
2. By September 1, 2005 the Districts shall identify any parts of the collection system that do not have sufficient capacity to convey sewage flows during wet weather and, if needed, submit a plan for controlling sources of inflow and infiltration or providing sufficient conveyance capacity.

V. **PLAN REVIEW AND APPROVAL:** Where this Order requires the submittal of a plan to EPA, that plan shall be subject to EPA review, comment and approval. EPA will, as expeditiously as possible, review and approve or comment on the plan. EPA will complete its review within 60 days of receipt of a plan, or a revised plan, or it will, in writing, extend EPA's review for an additional 30 days. The Districts shall make any revisions requested by EPA in writing or respond to any EPA comments and submit a revised plan to EPA within 30 days of receipt of EPA's comments or requested revisions. If EPA does not respond by the end of the review period, the Districts shall implement the plan as submitted. Upon approval of the plans by EPA, the plans are incorporated by reference as an enforceable part of this Order. All annual reports required by this Order are also subject to EPA review and approval in accordance with this paragraph.

- VI. **QUARTERLY SPILL REPORTS:** On the first day of February, May, August, and November in each year in which activities are conducted pursuant to this Order, the Districts shall submit a summary of all sewage spills occurring during the previous calendar quarter, along with primary factors contributing to the spills, if known. Information reported shall include the spill date, time, estimated volume, duration, and location, as well as the pipe size, material, and age. The reports shall indicate whether spills are to Waters of the U.S., and include spills to storm drains or other man-made conveyances to such waters. Steps taken to remedy the problem shall also be documented.
- VII. **ANNUAL PROGRESS REPORTS** - Beginning in 2004, on September 1 of each year in which activities are conducted pursuant to this Order, the Districts shall submit a written summary progress report detailing its implementation of the requirements of this Order during the preceding fiscal year (July 1 to June 30). The reports shall also evaluate the effectiveness of the spill reduction programs, and detail additional actions the Districts plan to take to further eliminate spills. The annual progress report shall also contain the wastewater collection system annual budget for the current year. Annual progress reports are subject to EPA review and approval in accordance with Paragraph V.

**VIII. INFORMATION SUBMITTAL**

- A. All submittals made pursuant to this Order shall be mailed to the following addresses:

U.S. Environmental Protection Agency  
Clean Water Act Compliance Office (WTR-7)  
Water Division  
75 Hawthorne Street  
San Francisco, CA 94105  
Attn: David Basinger

Mr. Dennis Dickerson  
Executive Officer  
California Regional Water Quality Control Board  
Los Angeles Region  
320 West 4<sup>th</sup> Street, Suite 200  
Los Angeles, CA 90013

Mr. Harold Singer  
Executive Officer  
Lahontan Region  
Victorville Branch Office  
15428 Civic Drive, Suite 100  
Victorville, CA 92392

- B. Such submittals shall include the following certification signed by a duly authorized representative:

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, I certify that the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

- C. The information requested herein must be provided notwithstanding its possible characterization as confidential business information or trade secrets. EPA has promulgated regulations to protect the confidentiality of the business information it receives. These regulations are set forth in part 2, subpart B of Title 40 of the Code of Federal Regulations. A claim of business confidentiality may be asserted in the manner specified by 40 C.F.R. section 2.203(b) for part or all of the information requested. EPA

will disclose business information covered by such a claim only as authorized under 40 C.F.R. part 2, subpart B. If no such claim accompanies the business information at the time EPA receives it, EPA may make it available to the public without further notice.

## IX. GENERAL PROVISIONS

- A. This Order is not a permit under the Act, and does not relieve the Districts of any obligations imposed by the Act or any other law, regulation or permit.
- B. All requirements to submit information to EPA set forth in this Order are not subject to review by the Office of Management and Budget (“OMB”) under the Paperwork Reduction Act because they are not “information collection requests” within the meaning of 44 U.S.C. §§3502(3), 3507, 3512, and 3518(c)(1). See also, 5 C.F.R. §§ 1320.3(c), 1320.4, and 1320.6(a). Furthermore, they are exempt from OMB review under the Paperwork Reduction Act because they are directed to fewer than ten persons and are an exempt investigation. 44 U.S.C. §§ 3502(4), (11), 3518(c)(1); 5 C.F.R. §§ 1320.4 and 1320.6(a).
- C. Issuance of an Order for Compliance shall not be deemed an election by EPA to forego any administrative, civil, or criminal action to seek penalties, fines, or other appropriate relief under the Act.
- D. Failure to respond, or any other violation of the terms of this Order could subject the Districts to a civil action for appropriate relief pursuant to Section 309(b) of the Act [33 U.S.C. 1319(b)], and/or penalties under Section 309(d) of the Act [33 U.S.C. 1319(d)]. In addition, Section 309(c)(1) of the Act [33 U.S.C. 1319(c)(1)] provides that negligent violations shall be punished by a fine of not less than \$2,500 per day or more than \$25,000 per day of violation, or imprisonment for not more than one year, or both. Section 309(c)(2) of the Act [33 U.S.C. 1319(c)(2)] provides that knowing violations shall be punished by a fine of not less than \$5,000 per day or more than \$50,000 per day of violation, or imprisonment for not more than three years, or both. Section 309(c)(4) of the Act [33 U.S.C. 1319(c)(4)] provides penalties for knowingly making false statements.
- E. If any event occurs that may cause a failure to timely carry out any requirement of this Order, the Districts shall notify EPA in writing within twenty-one (21) calendar days of the time the Districts becomes aware of the effect the event may have on compliance. The notice shall describe in detail the precise cause of the failure and measures taken to prevent or minimize the failure. The Districts shall implement reasonable measures to avoid or minimize any such failure. Failure of the Districts to timely notify shall render the provisions of this paragraph void and of no effect as to the particular incident involved unless notice is impossible due to catastrophic circumstances. For purposes of this Order, a Force Majeure is defined as any event arising from causes beyond the control of the Districts and which could not be overcome or prevented by due diligence, and which delays or prevents performance by a date required by this Order. If EPA agrees that the delay was caused by circumstances beyond the control of the Districts,

EPA shall modify this Order to provide additional time for performance of the requirement and as applicable, any subsequent requirement.

- F. This Order remains in effect until terminated by the Director of the Water Division, EPA, Region 9. Such termination shall not occur before December 31, 2004, unless the Director determines otherwise. The Districts may petition the Director to terminate the order based on the Districts' progress toward reducing and eliminating sewage spills that are a violation of the CWA and certification by the Districts that they have completed each requirement of this Order and have in place programs and financial plans to assure the continued improvement of the collection system.

Dated this 30<sup>th</sup> day of Sept., 2003



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Alexis Strauss, Director

Water Division  
U.S. Environmental Protection Agency  
Region 9  
75 Hawthorne Street  
San Francisco, CA 94105

**ATTACHMENT 1: Finding of Violation and Order Docket No. CWA 309-9-03-31**

**COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY  
Sewage Spills to Waters of the United States: October 1, 1998 to August 22, 2003<sup>1</sup>**

| Date<br>(Mo/Dy/Yr)      | Overflow Location<br>(Districts location)  | Total Overflow Volume<br>(gallons) <sup>2</sup> |
|-------------------------|--|---|
| 10/16/1998              | Madison Street Trunk Sewer Extension, City of Rolling Hill Estates                   | 5,000   |
| 11/18/1998              | Main Street Trunk Sewer, City of Long Beach  | 3,900   |
| 11/26/1998              | Trunk "F" Sewer, City of Lancaster   | 9,000   |
| 05/23/1999 <sup>3</sup> | Joint Outfall "A" Trunk Sewer  | 61,000  |
| 08/16/1999 <sup>3</sup> | Joint Outfall "J" Trunk Sewer, City of Rancho Palos Verdes                           | 30,000  |
| 09/24/1999              | California Avenue Extension and Huntington Park Relief Extension, City of South Gate | 30,000  |
| 01/13/2000              | Abalone Cove Pumping Plant Force Main, City of Rancho Palos Verdes                   | 60,000  |
| 03/08/2000              | Arcadia-Sierra Madre Trunk Sewer, City of Sierra Madre                               | 2,000   |
| 03/24/2000              | Madison Street Trunk Sewer, City of Torrance   | 100   |
| 03/25/2000 <sup>3</sup> | Madison Street Trunk Sewer, City of Torrance   | 2,000   |
| 02/09/2001              | Narbonne Avenue Trunk Sewer, City of Lomita  | 5,000   |
| 03/07/2001              | Arroyo Drive Truck Sewer, City of Montebello   | 40,000  |

<sup>1</sup> Sources: "Collection System Spill Chronology for period 7/1/96 to 6/30/01", Appendix K to letter dated September 21, 2001 in response to U.S. EPA information request 308-IX-FY01-29; also, spill reports submitted by the Districts to the Regional Board for spills dated 6/2/99 through 8/22/03

<sup>2</sup> Districts reported that, for some spills, a portion of the spilled sewage was recovered.

<sup>3</sup>Spills included in Regional Board Order on Complaint No .00-171 for Administrative Liability, issued May 18, 2001 against CSDLAC for sanitary sewer overflows from JWPCP and its collection system in 1999 and 2000.

|                          |  |         |
|--------------------------|--|---------|
| 05/15/2001               | Arcadia-Sierra Madre Trunk Sewer, City of Sierra Madre                   | 8,000   |
| 05/22/2001               | Malaga Cove Pumping Plant No. 1 Force Main, City of Palos Verdes Estates | 300     |
| 10/22/2001               | Malaga Cove Pumping Plant 1 Force Main, City of Palos Verdes Estates     | 100     |
| 10/29/2001               | Malaga Cove Pumping Plant 1 Force Main, City of Palos Verdes Estates     | 900     |
| 12/02/2001 to 12/03/2001 | Whites Point Pumping Plant, City of Los Angeles                          | 190,000 |
| 05/16/02                 | Arcadia-Sierra Madre Trunk Sewer, City of Sierra Madre                   | 1,300   |
| 11/15/2002               | Huntington Park Trunk Sewer, City of Huntington Park                     | 1,100   |
| 11/08/2002 to 11/21/2002 | Victoria Street Trunk Sewer, City of Compton                             | 86,000  |
| 02/12/2003               | Manchester-Vermont Diversion Extension Trunk Sewer, City of LA           | 2,700   |
| 02/12/2003               | Palos Verdes North Slope Trunk Sewer, City of Torrance                   | 17,000  |
| 02/12/2003               | Western Avenue Pumping Plant, City of Rancho Palos Verdes                | 7,800   |
| 02/12/2003               | Slack Road Trunk Sewer, City of South El Monte                           | 1,800   |
| 03/06/2003               | Scott Avenue Trunk Sewer, City of Whittier                               | 6,800   |
| 06/11/2003               | Holmes-Willowbrook Trunk Sewer, Florence unincorporated area             | 2,800   |
| 08/11/2003               | Vesta Street Pumping Plant, City of Inglewood                            | 89,600  |