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Via Certified Mail –
Return Receipt Requested

June 15, 2023

Angela Calvillo, Clerk of the Board
Board of Supervisors
City and County of San Francisco
1 Dr. Carlton B. Goodlett Place
City Hall, Room 244
San Francisco, CA 94102-4689

Dennis Herrera, General Manager
San Francisco Public Utilities Commission
525 Golden Gate Ave.
San Francisco, CA 94102

Re: Notice of Violations and Intent to File Suit Under the Clean Water Act

Dear Ms. Calvillo, Mr. Herrera, and Members of the Board:

STATUTORY NOTICE

This Notice is provided on behalf of California River Watch ("River Watch") with regard to violations of the Clean Water Act ("CWA" or "Act"), 33 U.S.C. § 1251 *et seq*., that River Watch alleges are occurring through the ownership and operation of the Oceanside Water Pollution Control Plant, Southeast Water Pollution Control Plant, Northpoint Wet-Weather Facility, Wastewater Collection System, and Westside Recycled Water Project (collectively, "Facilities").

River Watch hereby places the City and County of San Francisco ("City"), as owner and operator of the Facilities and associated sewer collection system, on notice that following the expiration of sixty (60) days from the date of this Notice, River Watch will be entitled under CWA § 505(a), 33 U.S.C. § 1365(a), to bring suit in the U.S. District Court against the City for continuing violations of an effluent standard or limitation pursuant to CWA § 301(a), 33 U.S.C. § 1311(a), and the Regional Water Quality Control Board, San Francisco Bay Region ("RWQCB-SF"), Water Quality Control Plan ("Basin Plan"), as the result of violations of the City's National Pollution Discharge Elimination System ("NPDES") Permits.

The CWA regulates the discharge of pollutants into navigable waters. The statute is structured in such a way that all discharges of pollutants are prohibited with the exception of enumerated statutory provisions. One such exception authorizes the City, which has been issued permits pursuant to CWA § 402, 33 U.S.C. § 1342, to discharge designated pollutants at certain levels subject to certain conditions. The effluent discharge standards or limitations specified in an NPDES permit

define the scope of the authorized exception to the CWA § 301(a), 33 U.S.C. § 1311(a) prohibition, such that violation of a permit limit places a discharger in violation of the CWA. River Watch alleges the City is in violation of the CWA by violating the terms of its NPDES Permits.

The CWA provides that authority to administer the NPDES permitting system in any given state or region can be delegated by the Environmental Protection Agency ("EPA") to a state or to a regional regulatory agency provided that the applicable state or regional regulatory scheme under which the local agency operates satisfies certain criteria (*see* 33 U.S.C. § 1342(b)). In California, the EPA has granted authorization to a state regulatory apparatus comprised of the State Water Resources Control Board ("SWRCB") and several subsidiary regional water quality control boards to issue NPDES permits. The entity responsible for issuing NPDES permits and otherwise regulating the City's operations in the region at issue in this Notice is the RWQCB-SF.

While delegating authority to administer the NPDES permitting system, the CWA provides that enforcement of the statute's permitting requirements relating to effluent standards or limitations imposed by the Regional Boards can be ensured by private parties acting under the citizen suit provision of the statute (*see* CWA § 505, 33 U.S.C. § 1365). River Watch is exercising such citizen enforcement to enforce the City's compliance with the CWA.

NOTICE REQUIREMENTS

The CWA requires that any Notice regarding an alleged violation of an effluent standard or limitation, or of an order with respect thereto, shall include sufficient information to permit the recipient to identify the following:

1. Standard, Limitation, or Order Alleged to Have Been Violated

The orders which are the subject of this Notice are:

NPDES No. CA0037681, *Waste Discharge Requirements and National Pollutant Discharge Elimination System Permit for City and County of San Francisco Oceanside Water Pollution Control Plant, Wastewater Collection System, and Westside Recycled Water Project,* and

NPDES No. CA0038873 *Waste Discharge Requirements for Nutrients From Municipal Wastewater Discharges to San Francisco Bay*.

River Watch has identified specific violations of the NPDES Permits including violations of receiving water limitations, effluent limitations, and raw sewage discharges, in addition to failure by the City to either comply with or provide evidence that it has complied with all the terms of its NPDES Permits.

2. Activity Alleged to Constitute a Violation

River Watch contends the City has violated the Act as described in this Notice. River Watch contends these violations are continuing or have a likelihood of occurring in the future.

A. Violations of Effluent Limitations and Discharge Prohibitions for Oceanside Water Pollution Control Plant

River Watch's review of the City's Self-Monitoring Reports identifies numerous violations of the effluent limitations imposed under NPDES Permit Section IV, *Discharge Prohibitions*. A full listing of the violations is provided in **Attachment A** to this Notice.

The City's Self-Monitoring Reports identify the following violations of the effluent limitations imposed under NPDES No. CA0037681, Section IV.A.1; Table 4: Total Suspended Solids (TSS):

- February 4, 2023 (Event ID# 1115242) – "Total Suspended Solids (TSS) Weekly Average limit was 45.0 mg/L and reported value was 48.0 mg/L."

- January 31, 2023 (Event ID# 1115241) –"Total Suspended Solids (TSS). Percent Removal Monthly Average limit is 85   and reported value was 84   at EFF-001."

- January 31, 2023 (Event ID# 1115240) – "Total Suspended Solids (TSS) Monthly Average limit is 30 mg/L and reported value was 31 mg/L at EFF-001."

- June 30, 2019 (Event ID# 1058936) – Total Suspended Solids exceeded monthly average limit.

- November 24, 2018 (Event ID# 1054392) – "Total Suspended Solids (TSS) Weekly Average limit is 45 mg/L and reported value was 55 mg/L at EFF-001A."

River Watch's review of the City's Self-Monitoring Reports identifies the following violations of effluent limitations imposed under NPDES No. CA0038873, Section VI.C.5.c.iv(b).

- January 10, 2023 (Event ID# 1115328) – Did not comply with wet weather plant operational requirements.

- January 3, 2023 (Event ID# 1115237) – Did not comply with wet weather plant operational requirements.

- January 1, 2023 (Event ID# 1115236) – Did not comply with wet weather plant operational requirements.

- December 31, 2022 (Event ID# 1115328) – Did not comply with wet weather plant operational requirements.

- February 15, 2021 (Event ID# 1091449) – Did not comply with wet weather plant operational requirements.

- December 17, 2020 (Event ID# 1087657) – Did not comply with wet weather plant operational requirements.

- April 6, 2020 (Event ID# 1076485) – Did not comply with wet weather plant operational requirements.

- November 26, 2019 (Event ID# 1068871) – Did not comply with wet weather plant operational requirements.

River Watch's review of the City's Self-Monitoring Reports identifies the following violations of effluent limitations imposed under NPDES No. CA0037681 Section III.A:

- August 17, 2019 (Event ID# 1087666) – "an estimated 1.8 million gallons (MG) of primary treated wastewater bypassed the secondary treatment facilities and discharged through the Southwest Ocean Outfall."

- January 25, 2019 (Event ID# 1064928) – "Three discharges of untreated wastewater through SFPUC's Oceanside Plant."

B. Deficient Monitoring Violations for North Point Wet-Weather Facility

River Watch's review of the City's Self-Monitoring Reports identifies the following violations of effluent limitations imposed under NPDES No. CA0038873 Section VI.C.5.iii(b): Order Conditions.

- February 23, 2023 (Event ID# 1115328) – "an estimated additional 0.44 million gallons (MG) – or approximately an additional 0.6% – was discharged into the Central Basin."

- January 9, 2023 (Event ID# 1115326) – "an estimated additional 0.26 million gallons (MG) or less than an additional 0.1% was discharged in the Central Basin."

- December 31, 2022 (Event ID# 1115323) – "temporary decrease in pumping to the North Point Wet Weather Facility potentially increased the volume of Northshore CSDs on December 31 by approximately 4%."

- October 24, 2021 (Event ID# 1100520) – "SEP flow was no maintained at 250 MGD during a wet weather event as required by Provision VI.C.5.c.iii(c) of the SEP permit. This resulted in an approximate CSD volume increase of 4.7%."

- October 23, 2021 (Event ID# 1100519) – "CSDs occurred in the Northshore Basin before the North Point Facility reached 135 MGD, as required by Provision VI.C.5.c.iii(a) of the SEP permit. This resulted in an approximate CSD volume increase of 5.7%."

- October 21, 2021 (Event ID# 1100518) – "SEP flow was not maintained at 250 MGD during the wet weather event as required by Provision VI.C.5.c.iii(c) of the SEP permit."

- December 17, 2020 (Event ID# 1087673) – "A discharge occurred at CSD-029 before the Mariposa Pump Station reached 20 MGD, as required by Provision VI.C.5.iii(b) of the SEP permit. This resulted in an approximate CSD volume increase of 1.3%. The issue was caused by a drain valve blocked open."

- December 22, 2019 (Event ID# 1087670) – "The Mariposa Pump Station (MPS) did not maintain peak wet weather capacity (10 MGD)… This resulted in an additional estimated 0.25 MG through the Mariposa CSD outfall."

- November 5, 2018 (Event ID# 1054349) – "Secondary-treated, chlorinated, and dechlorinated wastewater discharged to Islais Creek from leak in the 36-inch force main from the Booster Pump Station to Discharge Point 001."

River Watch's review of the City's Self-Monitoring Reports identifies the following violation of effluent limitation imposed under NPDES No. CA0037681 Section IV.A.1.Table 5: Oil and Grease.

- July 31, 2019 (Event ID# 1066998) – "Oil and Grease Monthly Average limit is 10 mg/L and reported value was 12 mg/L at EFF-001A."

River Watch's review of the City's Self-Monitoring Reports identifies the following violations of effluent limitations imposed under NPDES No. CA0037681 Section IV.A.1. Table 4: Total Suspended Solids.

- July 31, 2019 (Event ID# 1087669) – "Total Suspended Solids (TSS) Monthly Average (Mean) limit is 30 mg/L at EFF-001A."

- July 6, 2019 (Event ID# 1087668) – "Total Suspended Solids (TSS) Weekly Average (Mean) limit is 45 mg/L and reported value was 52 mg/L at EFF-001A."

- June 30, 2019 (Event ID# 1066848) – "Total Suspended Solids (TSS) Monthly Average limit is 30 mg/L and reported value was 60 mg/L at EFF-001A."

- June 30, 2019 (Event ID# 1066849) – "Total Suspended Solids (TSS) Percent Removal Monthly Average limit is 85% and reported value was 80 % at EFF-001A."

- June 22, 2019 (Event ID# 1066847) – "Total Suspended Solids (TSS) Weekly Average limit is 45 mg/L and reported value was 98 mg/L at EFF-001A."

- June 15, 2019 (Event ID# 1066846) – "Total Suspended Solids (TSS) Weekly Average limit is 45 mg/L and reported value was 78 mg/L at EFF-001A."

River Watch's review of the City's Self-Monitoring Reports identifies the following violation of effluent limitations imposed under NPDES No. CA0037681 Attachment E, VI.A.1.Table E-11 for Fecal Coliform.

- June 30, 2019 (Event ID# 1066850) – "Fecal Coliform 10% for 30 days limit is 1100 MPN/100 mL and reported value was 1600 MPN/100 mL at EFF-001A."

River Watch's review of the City's Self-Monitoring Reports identifies the following violations of effluent limitations imposed under NPDES No. CA0037681 Attachment F, C.1.Table F-2: Biochemical Oxygen Demand.

- June 30, 2019 (Event ID# 1066845) – "BOD5 @ 20 Deg. C. Percent Removal Monthly Average limit is 85% and reported value was 84% at EFF-001A"

- June 30, 2019 (Event ID# 1066844) – "Biochemical Oxygen Demand (BOD) (5-day @ 20 Deg. C.) Monthly Average limit is 30 mg/L and reported value was 48 mg/L at EFF-001A"

- June 22, 2019 (Event ID# 1066843) – "Biochemical Oxygen Demand (BOD) (5-day @ 20 Deg. C.) Weekly Average limit is 45 mg/L and reported value was 59 mg/L at EFF-001A."

- June 15, 2019 (Event ID# 1066841) – "Biochemical Oxygen Demand (BOD) (5-day @ 20 Deg. C.) Weekly Average limit is 45 mg/L and reported value was 62 mg/L at EFF-001A."

River Watch's review of the City's Self-Monitoring Reports identifies the following violations of effluent limitations imposed under NPDES No. CA0037681 Section III.A: Discharge of treated wastewater at a location or in a manner different than described in this Order is prohibited: Unauthorized Discharges.

- April 8, 2022 (Event ID# 1115322) – "Discharged approximately 55 gallons of hydraulic fluid from one of the Division Street Combined Sewer Discharge (CSD) Outfall Gates."

- December 16, 2021 (Event ID# 1100564) – "Discharged approximately 40,000 gallons of treated and disinfected effluent from SEP through a leaking pipe joint in the final effluent force main below Pier 80."

- October 4, 2021 (Event ID# 1096743) – "Discharged approximately 64,000 gallons of secondary treated, disinfected wastewater to EFF-002."

- December 23, 2020 (Event ID# 1087679) – "A leak from a joint on the forty-two-inch Aisles Creek force main that conveys treated effluent from SEP to the Pier 80 deep-water outfall."

- June 10, 2020 (Event ID# 1087671) – "Secondary treated and disinfected wastewater was discharged to San Francisco Bay from the SEP final effluent outfall pipe at a point approximately 470 feet upstream of Discharge Point No. 001."

River Watch's review of the City's Self-Monitoring Reports identifies the following violations of effluent limitations imposed under NPDES No. CA0037681, Section IV.

- October 4, 2021 (Event ID# 1100517) – "Acute Toxicity 11 Sample 90th Percentile limit is 70.0% survival and reported value was 35% survival at EFF-001A."

- July 21, 2021 (Event ID# 1097611) – "Acute Toxicity 11 Sample 90th Percentile limit is 70% survival and reported value was 50% survival at EFF-001A."

- November 2, 2020 (Event ID# 1087672) – "Acute Toxicity 11- Sample Median limit is 90% survival and reported value was 85% survival at EFF-001A."

- March 9, 2020 (Event ID# 1076566) – "Acute toxicity 11 – Sample 90th Percentile limit is 70% survival and reported value was 50% survival at EFF-001A."

- March 2, 2020 (Event ID# 1076565) – "Acute toxicity 11 – Sample 90th Percentile limit is 70% survival and reported value was 60% survival at EFF-001A."

- June 7, 2019 (Event ID# 1066837) – "Acute toxicity 11 Sample 90th Percentile limit is 70% survival and reported value was 55% survival at EFF-001A."

- June 7, 2019 (Event ID# 1066836) – "Acute toxicity 11 – Sample Median limit is 90% survival and reported value was 85% survival at EFF-001A."

- April 12, 2019 (Event ID# 1066835) – "Acute toxicity 11 Sample 90th Percentile limit is 70% survival and reported value was 55% survival at EFF-001A."

- December 10, 2018 (Event ID# 10668354 – "Acute toxicity 11 Sample 90th Percentile limit is 70% survival and reported value was 55% survival at EFF-001A."

- December 5, 2018 (Event ID# 1066833) – "Acute toxicity 11 Sample 90th Percentile limit is 70% survival and reported value was 45% survival at EFF-001A."

- June 18, 2018 (Event ID# 1048823) – "Acute toxicity 11 Sample Median limit is 90% survival and reported value was 85% survival at EFF-001A."

- May 7, 2018 (Event ID# 1048824) – "Acute toxicity 11 Sample 90th Percentile limit is 70% survival and reported value was 45% survival at EFF-001A."

- May 7, 2018 (Event ID# 1048822) – "Acute toxicity 11 Sample Median limit is 90% survival and reported value was 85% survival at EFF-001A."

C. Violations of Effluent Limitations and Discharge Specifications for Southeast Water Pollution Control Plant

River Watch's review of the City's Self-Monitoring Reports identifies the following violations of effluent limitations imposed under NPDES No. CA0037681 Section IV: Acute Toxicity.

- March 9, 2020 (Event ID# 1076566) – "Acute Toxicity 11 Sample 90th Percentile limit is 70% survival and reported value was 50% survival at EFF-001A."

- March 2, 2020 (Event ID# 1076565) – "Acute Toxicity 11 Sample 90th Percentile limit is 70% survival and reported value was 60% survival at EFF-001A."

- October 4, 2021 (Event ID# 1100517) – "Acute Toxicity 11 Sample 90th Percentile limit is 70.0% survival and reported value was 35% survival at EFF-001A."

- July 21, 2021 (Event ID# 1097611) – "Acute Toxicity 11 Sample 90th Percentile limit is 70 % survival and reported value was 50% survival at EFF-001A."

- November 2, 2020 (Event ID# 1087672) – "Acute Toxicity 11- Sample Median limit is 90% and reported value was 85% survival at EFF-001A."

- June 7, 2019 (Event ID# 1066837) – "Acute toxicity 11 Sample 90th Percentile limit is 70 % survival and reported value was 55% survival at EFF-001A."

- June 7, 2019 (Event ID# 1066836) – "Acute Toxicity 11 – Sample Median limit is 90% survival and reported value was 85% survival at EFF-001A."

- April 12, 2019 (Event ID# 1066835) – "Acute toxicity 11 Sample 90th Percentile limit is 70% survival and reported value was 55% survival at EFF-001A."

- December 10, 2018 (Event ID# 1066834) – "Acute toxicity 11 Sample 90th Percentile limit is 70% survival and reported value was 55% survival at EFF-001A."

- November 5, 2018 (Event ID# 1066833) – "Acute toxicity 11 Sample 90th Percentile limit is 70% survival and reported value was 45% survival at EFF-001A."

- June 18, 2018 (Event ID# 1048823) –"Acute toxicity 11 Sample Median limit is 90 % survival and reported value was 85% survival at EFF-001A."

River Watch's review of the City's Self-Monitoring Reports identifies the following violations of effluent limitations imposed under NPDES No. CA0038873 Section VI.C.5.iii(b) Order Conditions.

- February 23, 2023 (Event ID# 1115328) – "an estimated additional 0.44 million gallons (MG) – or approximately an additional 0.6% -- was discharged in the Central Basin."

- January 9, 2023 (Event ID# 1115326) – "an estimated additional 0.26 million gallons (MG) or less than an additional 0.1% was discharged in the Central Basin."

- December 31, 2022 (Event ID# 1115323) –"the temporary decrease in pumping to the North Point Wet Weather Facility potentially increased the volume of Northshore CSDs on December 31 by approximately 4%."

- October 24, 2021 (Event ID# 1100520) – "an approximate CSD volume increase of 5.7%."

- October 23, 2021 (Event ID# 1100519) – "CSDs occurred in the Northshore Basin before the North Point Facility reached 135 MGD, as required by Provision."

- October 21, 2021 (Event ID# 1100518) – "SEP flow was not maintained at 250 MGD during wet weather event as required by Provision."

- December 17, 2020 (Event ID# 1087673) – "A discharge occurred at CSD-029 before the Mariposa Pump Station reached 10 MGD, as required by Provision."

- December 22, 2019 (Event ID# 1087670) – "The Mariposa Pump Station (MPS) did not maintain peak wet weather capacity (10 MGD) during the 12/22 CSD event in accordance with Provision.

- October 18, 2018 (Event ID# 1054349) – Secondary-treated, chlorinated, and dechlorinated wastewater discharged to Aisles Creek from leak in the 36-inch force main from the Booster Pump Station to Discharge Point 001."

River Watch's review of the City's Self-Monitoring Reports identifies the following violations of effluent limitations imposed under NPDES No. CA0037681 Section III.A: Discharge of treated wastewater at a location or in a manner different than described in this Order is prohibited: Unauthorized Discharges.

- April 8, 2022 (Event ID# 1115322) – "Discharged approximately 55 gallons of hydraulic fluid from one of the Division Street Combined Sewer Discharge (CSD) Outfall gates."

- December 16, 2021 (Event ID# 1100564) –"Discharged approximately 40,000 gallons of treated and disinfected effluent from SEP through a leaking pipe joint in the final effluent force main below Pier 80."

- August 5, 2021 (Event ID# 1096743) – "Discharged approximately 64,000 gallons of secondary treated, disinfected wastewater to EFF-002."

- December 23, 2020 (Event ID# 1087679) – "a leak from a joint on the forty-two-inch Aisles Creek force main that conveys treated effluent from SEP to the Pier 80 deep-water outfall."

- June 10, 2020 (Event ID# 1087671) – "secondary treated and disinfected wastewater was discharged to San Francisco Bay from the SEP final effluent outfall pipe."

River Watch's review of the City's Self-Monitoring Reports identifies the following violation of effluent limitations imposed under NPDES No. CA0037681 Section IV.A.1.Table 5: Oil and Grease.

- July 31, 2019 (Event ID# 1066998) – "monthly average limit is 10 mg/L and reported value was 12 mg/L."

River Watch's review of the City's Self-Monitoring Reports identifies the following violation of effluent limitations imposed under NPDES No. CA0037681 Attachment E, VI.A.1.Table E-11 for Fecal Coliform.

- June 30, 2019 (Event ID# 1066850) – "Fecal Coliform 10% for 30 days limit is 1100 MPN/100 mL and reported value was 1600 mg/L"

River Watch's review of the City's Self-Monitoring Reports identifies the following violations of effluent limitations imposed under NPDES No. CA0037681 Section IV.A.1.Table 4 for Total Suspended Solids.

- June 30, 2019 (Event ID# 1066849) – "Total Suspended Solids (TSS) Percent Removal Monthly Average limit is 85% and reported value was 80%."
- June 30, 2019 (Event ID# 1066848) – "Total Suspended Solids (TSS) Monthly Average limit is 30 mg/L and reported value was 60 mg/L."
- June 22, 2019 (Event ID# 1066847) – "Total Suspended Solids (TSS) Weekly Average limit is 45 mg/L and reported value was 98 mg/L."
- June 15, 2019 (Event ID# 1066846) – "Total Suspended Solids (TSS) Weekly Average limit is 45 mg/L and reported value was 78 mg/L."
- July 31, 2019 (Event ID# 1087669) – "Total Suspended Solids (TSS) Monthly Average (Mean) limit is 30 mg/L and reported value was 37 mg/L."
- July 6, 2019 (Event ID# 1087668) – "Total Suspended Solids (TSS) Weekly Average (Mean) limit is 45 mg/L and reported value was 52 mg/L."

River Watch's review of the City's Self-Monitoring Reports identifies the following violations of effluent limitations imposed under NPDES No. CA0037681 Section IV.A.1.Table 4 for Biochemical Oxygen Demand*:*

- June 30, 2019 (Event ID# 1066845) – "BOD5 @ 20 Deg. C, Percent Removal Monthly Average limit is 85% and reported value was 84 %."
- June 30, 2019 (Event ID# 1066844) – "Biochemical Oxygen Demand (BOD) (5-day @ 20 Deg. C) Monthly Average limit is 30 mg/L and reported value was 48 mg/L."
- June 22, 2019 (Event ID# 1066843) –"Biochemical Oxygen Demand (BOD) (5-day @ 20 Deg. C) Weekly Average limit is 45 mg/L and reported value was 59 mg/L."
- June 15, 2019 (Event ID# 1066841) –"Biochemical Oxygen Demand (BOD) (5-day @ 20 Deg. C) Weekly Average limit is 45 mg/L and reported value was 62 mg/L"

D. Violations of Receiving Water Limitations and Impacts to Beneficial Uses

Discharges in excess of the Receiving Water Limitations specified in NPDES No. CA0037681, Section V cause prohibited pollution by unreasonably affecting their beneficial uses. In order to protect these beneficial uses, the City is required by its NPDES Permit to ensure that discharges shall not cause the listed limitations to be exceeded. River Watch finds insufficient information in the public record demonstrating the City has monitored for and complied with these receiving water standards.

E. Sanitary Sewer Overflows, Inadequate Reporting of Discharges, Failure to Warn, Failure to Mitigate Impacts, Sewer Collection System Subsurface Discharges

River Watch is understandably concerned as to the effects of both surface and underground Sanitary Sewer Overflows on critical habitat in and around the diverse and sensitive ecosystem of the Facilities. The NPDES Permits lists the beneficial uses of San Francisco Bay - a water of the United States, which include industrial service supply, commercial and sport fishing, shellfish harvesting, marine habitat, fish migration, preservation of rare and endangered species, fish spawning, wildlife habitat, water contact recreation, non-contact water recreation and navigation.

1. Sanitary Sewer Overflows ("SSO")

SSOs, in which untreated sewage is discharged above ground from the collection system prior to reaching the Facilities, are alleged to have occurred both on the dates identified in California Integrated Water Quality System ("CIWQS") Interactive Public SSO Reports and on the dates when no reports were submitted to CIWQS by the City, all in violation of the CWA.

Numerous causes for SSOs include storm water inflow and/or groundwater infiltration (I/I), defects in sewer lines, root intrusion, and blockages due to grease and rags. Currently, the City's collection system has insufficient capacity to handle peak wet weather flows. During heavy storms, the system becomes surcharged and untreated sewage overflows at various locations eventually draining to San Francisco Bay. These SSOs impact the water quality and beneficial uses of these waters. Possible adverse effects on water quality and beneficial uses as a result of SSOs include the following:

a. Adverse impacts to fish and aquatic biota caused by bio-solids deposition, oil and grease, and toxic pollutants common in sewage (such as heavy metals, pesticides, personal care products, and pharmaceuticals).

b. Creation of a localized toxic environment in the water column as the result of the discharge of oxygen-demanding pollutants that lower dissolved oxygen, and elevated ammonia concentration which is a fish toxicant.

c. Impairment of water contact recreation and non-contact water recreation and harm to fish and wildlife as a result of elevated bacteria levels including pathogens.

A review of the City's CIWQS Spill Public Report demonstrates the City acknowledges at least **3,700,000** gallons of raw sewage have recently been discharged to a water of the United States.

The City's records indicate an even greater percentage of SSOs reached a drainage to a surface water or a surface water itself. In addition to a violation of the CWA, these discharges also pose a nuisance pursuant to Calif. Water Code § 13050(m), and an imminent and substantial endangerment to public health and the environment. (*See* **Attachment B -** the City's CIWQS SSO Public Report Detail Page.) For example:

- December 31, 2022 (Event ID# 885158) – an SSO estimated at 2,300,000 gallons occurred on Marina Boulevard (Coordinates 37.80556 -122.444). The spill total was reported as 18,573,800 gallons. Both the total spill volume that reached land and the total spill volume recovered were reported as 16,273,800 gallons. However, 2,300,000 gallons were reported as having reached San Francisco Bay.

- October 24, 2021 (Event ID# 877142) – an SSO estimated at 49,000,000 gallons occurred at Marina Boulevard and Marina Green Park (Coordinates 37.8061-122.4399). Of the total 49,000,000 gallons, 3,500,000 gallons were reported as recovered, 3,500,000 were reported as having reached land and 1,400,000 gallons were reported as reaching a surface water.

2. Inadequate Reporting of Discharges

Full and complete reporting of SSOs is essential to gauging their impact to public health and the environment. The City's SSO Reports, which should reveal critical details about each of these SSOs, lack responses to specific questions that would identify the causes and the potential repairs ensuring these violations would not recur. In addition, River Watch's expert believes many of the SSOs reported by the City as partially reaching a surface water did so in greater volume than stated. River Watch's expert also believes that a careful reading of the time when the City received notification of an SSO, the time of its response, and the time at which the SSO ended, too often appear as unlikely estimations. For example:

- December 31, 2022 (Event ID# 885158) – The estimated spill start time is reported as 10:15 am. The notification time is reported as 12:00 pm. The operator arrival time is reported as 3:20 pm and the spill end time is reported as an hour and a half before the operator arrival at 1:50 pm. The total estimated spill volume is reported as 2,300,000 - discharging into San Francisco Bay.

- October 24, 2021 (Event ID # 877142) – The estimated spill start time is reported as 3:05 pm. The notification time is reported as 4:01 pm. The operator arrival time is reported as 5:03 am, almost ten hours before the start of the spill. The estimated spill end time is 5:05 am, two minutes after the operator arrival and ten hours before the spill start. The estimated spill volume is reported as 4,900,000 gallons, 1,400,000 gallons of which are reported as having reached a surface water.

Given the unlikely accuracy of the times and intervals provided in these reports, it is difficult to consider the stated volumes as accurate. Without accurately reporting the notification time, operator arrival, and spill end time, there is a danger that the duration and volume of a spill will be underestimated.

3. Failure to Mitigate Impacts

NPDES No. CA0037681, Attachment D. Standard Provisions, Section I. Standard Provisions - Permit Compliance, Sub-section C, Duty to Mitigate, states: *"The Discharger shall take all reasonable steps to minimize or prevent any discharge in violation of this Order that has a reasonable likelihood of adversity affecting human health or the environment. (40 C.F.R. § 122.41(d).)"*

River Watch contends the City is failing to adequately mitigate the impacts of its SSOs. In addition to compliance with the requirements of its NPDES Permits, the City is subject to the requirements of SWRCB Order No. 2006-0003-DWQ, *Statewide General Waste Discharge Requirements for Sanitary Sewer Systems,* as amended by *General Requirements for Sanitary Sewer Systems, Statewide Waste Discharge Requirements*, Order WQ 2022-0103-DWQ ("Statewide WDR") governing the operation of sanitary sewer systems. The Statewide WDR requires the City to take all feasible steps, and perform necessary remedial actions following the occurrence of an SSO, including limiting the volume of waste discharged, terminating the discharge, and recovering as much of the wastewater as possible. Further remedial actions include intercepting and re-routing of wastewater flows, vacuum truck recovery of the SSO, cleanup of debris at the site, and modification of the collection system to prevent further SSOs at the site.

The EPA's *Report to Congress on the Impacts and Control of CSOs and SSOs* (EPA 833-R-04-001) identifies SSOs as a major source of microbial pathogens and oxygen depleting substances. River Watch finds no record indicating the City has performed any analysis of the impact of its SSOs on aquatic or wildlife habitat, nor any evaluation of the measures needed to restore water bodies designated as habitat from the impacts of SSOs.

4. Sewer Collection System Subsurface Discharges

It is a well-established fact that exfiltration caused by pipeline cracks and other structural defects in a collection system result in discharges to adjacent surface waters via underground hydrological connections. River Watch alleges untreated sewage is discharged from cracks, displaced joints, eroded segments, etc., in the City's collection system into groundwater hydrologically connected to surface waters including, but not limited to San Francisco Bay. Surface waters become contaminated with pollutants including human pathogens. Chronic failures in the collection system pose a substantial threat to public health.

Studies tracing human markers specific to the human digestive system in surface waters adjacent to defective sewer lines in other systems have verified the contamination of the adjacent waters with untreated sewage. Evidence of exfiltration can also be supported by reviewing mass balance data, I/I data, video inspection, as well as tests of waterways adjacent to sewer lines for nutrients, human pathogens, and other human markers such as caffeine. Any exfiltration found is a violation of the NPDES Permit and therefore a violation of the CWA.

3. The Person or Persons Responsible for the Alleged Violation

The entity responsible for the alleged violations identified in this Notice is the City and County of San Francisco and those of its employees responsible for compliance with the CWA and

with any applicable state and federal regulations and permits. The City (in conjunction with the San Francisco Public Utilities Commission, a public agency of the City and County of San Francisco) is the owner and operator of the Facilities.

The Southeast Water Pollution Control Plant is the largest wastewater facility in the City serving residents from the Bayside of the City as well as Daly City and Brisbane. This plant treats a combination of storm water and wastewater collected from the combined collection system on the east side of the City and transported to the plant. Sixty million gallons per day of wastewater and 160 wet tons of biosolids are treated daily.

The Oceanside Water Pollution Control Plant treats a combination of storm water and wastewater collected by the City's combined collection system on the west side of the City. This plant is a secondary treatment plant with a maximum capacity of 65 million gallons per day and an average daily dry weather flow of 17 million gallons. The plant discharges treated water into the Pacific Ocean. It serves approximately one-third of the City's west side residents.

The North Point Wet-Weather Facility is the City's oldest facility. It provides pre-treatment and primary treatment with disinfection of wastewater collected in the northeast part of the City. This facility operates when the Southeast Water Pollution Control Plant approaches capacity.

The City's collection system serves all of the City as well as small portions of Brisbane and Daly City - a service area population of approximately 887,000.

4. The Location of the Alleged Violation

The locations of the various violations alleged in this Notice are identified in records created and/or maintained by or for the City which relate to the Facilities and associated collection system, as further described in this Notice.

5. Range of Dates During Which the Alleged Activity Occurred

The range of dates covered by this Notice is June 1, 2019 to the present. This Notice also includes all violations of the CWA by the City which occur after the range of dates covered by this Notice up to and including the time of trial. Some violations are continuous, and therefore each day constitutes a violation.

6. Name, Address, and Telephone Number of the Person Giving Notice

The entity giving notice is California River Watch, an Internal Revenue Code § 501(c)(3) nonprofit, public benefit corporation duly organized under the laws of the State of California. Its headquarters and main office are located in Sebastopol. Its mailing address is 290 South Main Street, #817, Sebastopol, CA 95472.

River Watch is dedicated to protecting, enhancing, and helping to restore surface waters and ground waters of California including coastal waters, rivers, creeks, streams, wetlands, vernal pools, aquifers and associated environs, biota, flora and fauna, and to educating the public concerning environmental issues associated with these environs.

River Watch may be contacted via email at US@ncriverwatch.org, or through its attorneys. River Watch has retained legal counsel with respect to the issues raised in this Notice. All communications should be directed to the following counsel:

Jack Silver, Esq.
Law Office of Jack Silver
708 Gravenstein Hwy. North, #407
Sebastopol, CA 95472
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RECOMMENDED REMEDIAL MEASURES

River Watch looks forward to meeting with City staff to tailor remedial measures to the specific operation of the Facilities and associated collection system. In advance of that conversation, River Watch identifies the following general remedial categories that will advance compliance with the CWA and the Basin Plan, and help economize the time and effort the parties need to resolve their concerns:

1. A full condition assessment of the sewer collection system including setting timelines for repairing or replacing significantly defective assets such as sewer lines, manholes and pump/lift stations.

2. Mitigating the effects of SSOs.

3. Adequate public and worker safety, including protocols to minimize exposure to infectious vectors.

4. Elimination of the use of chemical root control.

5. Consideration of a Supplemental Environmental Project in lieu of penalties.

CONCLUSION

The violations set forth in this Notice affect the health and enjoyment of members of River Watch who reside and recreate in the affected community and may use the affected watershed for recreation, fishing, hiking, photography or nature walks. Their health, use and enjoyment of this natural resource is specifically impaired by the City's alleged violations of the CWA as set forth in this Notice.

CWA §§ 505(a)(1) and 505(f) provide for citizen enforcement actions against any "person," including a governmental instrumentality or agency, for violations of NPDES permit requirements and for un-permitted discharges of pollutants. 33 U.S.C. §§ 1365(a)(1) and (f), 33 U.S.C. § 1362(5). An action for injunctive relief under the CWA is authorized by 33 U.S.C. § 1365(a). Violators of the Act are also subject to an assessment of civil penalties of up to $64,618.00 per day/per violation for all violations pursuant to Sections 309(d) and 505 of the Act, 33 U.S.C. §§ 1319(d), 1365. *See also* 40 C.F.R. §§ 19.1 – 19.4. River Watch believes this Notice sufficiently states grounds for filing suit

in federal court under the "citizen suit" provisions of CWA to obtain the relief provided for under the law.

The CWA specifically provides a **60-day** notice period to promote resolution of disputes. River Watch strongly encourages the City to contact counsel for River Watch within **20 days** after receipt of this Notice to initiate a discussion regarding the allegations detailed herein. In the absence of productive discussions to resolve this dispute, River Watch will have cause to file a citizen's suit under CWA § 505(a) when the 60-day notice period ends.

Very truly yours,

Jack Silver

JS: Attachments

Service List

Michael Regan – Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Mail Code 1101A
Washington, DC 20460

Martha Guzman – Regional Administrator
U.S. Environmental Protection Agency, Region 9
75 Hawthorne St.
San Francisco, CA 94105

Eileen Sobek – Executive Director
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812-0100

David Chiu, Esq.
Office of the City Attorney
City Hall, Room 234
1 Dr. Carlton B. Goodlett Place
San Francisco, CA 94102

ATTACHMENT A

141796	NPDES Permit	2	NPDMUNILRG	94-149	2 386010001	10/19/1994	10/19/1999	Historical	Y
148628	NPDES Permit	2	NPDMUNILRG	89-101	2 386010001	06/20/1989	06/20/1994	Historical	N
145971	NPDES Permit	2	NPDMUNILRG	84-027	2 386010001	06/20/1984	06/20/1989	Historical	Y

Total Reg Measures: 13

Violations

Violation ID	Occurred Date	Violation Type	(-) Violation Description	Corrective Action	Status	Classification	Source
1115328	02/23/2023	Order Conditions	During the February 23-24 overnight storm, the Channel Pump Station (CHS) pump rate reached 80 MGD before there was a CSD to Mission Channel from the Central Basin. During the CSD to Mission Channel from Discharge Points CSD-024 and 025, however, the CHS flow rate periodically dropped to less than 80 MGD due to the pumps tripping. As a result, an estimated additional 0.44 million gallons (MG) – or approximately an additional 0.6% – was discharged in the Central Basin (69.61 MG, total CSD event volume).	Staff manually reset pumps after they tripped offline.	Violation	B	Report
1115326	01/09/2023	Order Conditions	During the January 9 CSD event at the Mariposa outfall (Discharge Point No. CSD-029), MPS reached peak wet weather capacity (10 MGD) when the Mariposa CSD started but did not maintain that peak flow rate throughout the CSD event. Power issues during the storm caused the pumps to stop at 4:30 a.m. As a result, an estimated additional 0.26 million gallons (MG) or less than an additional 0.1% was discharged in the Central Basin (431.47 MG, total CSD event volume in Central Basin).	Staff traveled onsite and manually reset the pumps approximately 30 minutes after the pumps stopped at 4:30 AM.	Violation	B	Report
1115323	12/31/2022	Order Conditions	On New Year's Eve at approximately 10:10 a.m., one of the two Northshore wet weather pumps (which provide flow to the North Point Wet Weather Facility) was out of service because a control board on the variable frequency drive (VFDs) failed. An electrician qualified to work on high voltages was called in from standby and was able to restore manual operation of the pump by 1:50 p.m. The pump was run in manual mode for all subsequent wet weather events until January 12. The temporary decrease in pumping to the North Point Wet Weather Facility potentially increased the volume of Northshore CSDs on December 31 by approximately 4%.	A new control board was purchased, programmed, and installed on January 12.	Violation	B	Report
1115322	04/08/2022	UAUTHDISC	Discharged approximately 55 gallons of hydraulic fluid from one of the Division Street Combined Sewer Discharge (CSD) Outfall gates (gate #5). The cause of the spill is believed to be the failure of two hydraulic position sensors associated with the Division Street CSD Outfall. Notified of an issue via control system alarm on 4/7, but did not notice an oil sheen on receiving water until 4/8.	The failed position sensors have been replaced. Because of the unusual nature of this failure – sensors typically fail due to electronic issues and no similar failure is known to have occurred previously – the SFPUC intends to assess the condition of all of the position sensors and replace them as appropriate before the end of the summer.	Violation	B	Report
1100564	12/16/2021	UAUTHDISC	Discharged approximately 40,000 gallons of treated and disinfected effluent from SEP through a leaking pipe joint in the final effluent force main below Pier 80. Identified by contractors on 12/16, who notified SFPUC on 12/20.	Repairs completed on January 11, 2022 by installing a WEKO seal and applying "splash zone" epoxy. Post-repair inspection completed on January 12, 2022.	Violation	B	Report
1100520	10/24/2021	Order Conditions	SEP flow was not maintained at 250 MGD during a wet weather event, as required by Provision VI.C.5.c.iii(c) of the SEP permit. This resulted in an approximate CSD volume increase of 4.7%. The issue was caused by a power interruption from PG&E at the Bruce Flynn Pump Station.		Violation	B	Report
1100519	10/23/2021	Order Conditions	CSDs occurred in the Northshore Basin before the North Point Facility reached 135 MGD, as required by Provision VI.C.5.c.iii(a) of the SEP permit. This resulted in an approximate CSD volume increase of 5.7%. The issue was caused by operator error.	Relevant staff were reminded of the operational requirement.	Violation	B	Report
1100518	10/21/2021	Order Conditions	SEP flow was not maintained at 250 MGD during the wet weather event as required by Provision VI.C.5.c.iii(c) of the SEP permit, due to a blown manhole at the Facility's primary disinfection system (PDS), limiting the plants throughput to	The manhole has since been fully resecured.	Violation	B	Report

			150 MGD (secondary treatment capacity). This resulted in CSDs at in the Central Basin, as indicated by the SMR cover letter.				
1100517	10/04/2021	ATOX	Acute Toxicity 11 Sample 90th Percentile limit is 70.0 % survival and reported value was 35 % survival at EFF-001A.	Accelerated monitoring begun in November, showed 100% survival	Violation	A	Report
1096743	08/05/2021	UAUTHDISC	Discharged approximately 64,000 gallons of secondary treated, disinfected wastewater to EFF-002 due to an issue with the V20 valve located at the booster pump station during a power blip.	None identified. The valve responded in an unintended way after a power blip, and no cause could be identified, so no corrective actions were taken.	Violation	B	Report
1097611	07/21/2021	ATOX	Acute Toxicity 11 Sample 90th Percentile limit is 70 % survival and reported value was 50 % survival at EFF-001A.	Accelerated monitoring begun on August 2. Follow-up test showed 100% survival in the pH adjusted effluent.	Violation	A	Report
1087679	12/23/2020	UAUTHDISC	A leak from a joint on the forty-two-inch Islais Creek force main that conveys treated effluent from SEP to the Pier 80 deep-water outfall (Discharge Point No. 001) was initially discovered by a kayaker on December 23, 2020. SFPUC was notified and confirmed the leak on December 28, 2020.	The leak was repaired on January 21, 2021. Internal and external inspections of the force main will be performed as early as possible (currently expected to be February). Any condition needs identified through these inspections will be addressed to prevent further leaks.	Violation	B	Report
1087673	12/17/2020	Order Conditions	A discharge occurred at CSD-029 before the Mariposa Pump Station reached 10 MGD, as required by Provision VI.C.5.c.iii(b) of the SEP permit. This resulted in an approximate CSD volume increase of 1.3%. The issue was caused by a drain valve blocked open.	Shortly after the issue was discovered, the debris was cleared, and the valve closed. The drain valve was capped and the valve removed.	Violation	B	Report
1087672	11/02/2020	ATOX	Acute Toxicity 11-Sample Median limit is 90 % survival and reported value was 85 % survival at EFF-001A.	The NPDES permit (MRP section V.A.4) allows pH adjustment of acute toxicity samples to minimize ammonia interference. This will be used moving forward, as needed.	Violation	A	Report
1087671	06/10/2020	UAUTHDISC	On June 10-12, secondary treated and disinfected wastewater was discharged to San Francisco Bay from the SEP final effluent outfall pipe at a point approximately 470 feet upstream of Discharge Point No. 001. The discharge resulted from construction activities related to replacing a vent pipe section. Estimated release volume of 4,100 gallons, although discharge rate was sporadic and difficult to confirm.	The construction contractor repaired the leak using hydrophilic waterstop on June 12. The repair areas were monitored for several days after the repairs to confirm that the leak had been successfully repaired.	Violation	B	Report
1076566	03/09/2020	ATOX	Acute Toxicity 11 Sample 90th Percentile limit is 70 % survival and reported value was 50 % survival at EFF-001A.		Violation	A	Report
1076565	03/02/2020	ATOX	Acute Toxicity 11 Sample 90th Percentile limit is 70 % survival and reported value was 60 % survival at EFF-001A.		Violation	A	Report
1087670	12/22/2019	Order Conditions	The Mariposa Pump Station (MPS) did not maintain peak wet weather capacity (10 MGD) during the 12/22 CSD event in accordance with Provision VI.C.5.c.iii(b). This resulted in an additional estimated 0.25 MG through the Mariposa CSD outfall (CSD-029). The flow fluctuations at the pump station were indicative of a "ragging event".	The pump station is in the process of being upgraded, with a project expected to be completed in 2021. Additionally, SFPUC is reviewing pump performance as part of daily onsite inspections at MPS to minimize the likelihood of a future occurrence.	Violation	B	Report
1066998	07/31/2019	CAT1	Oil and Grease Monthly Average limit is 10 mg/L and reported value was 12 mg/L at EFF-001A.		Violation	B	Report
1087669	07/31/2019	CAT1	Total Suspended Solids (TSS) Monthly Average (Mean) limit is 30 mg/L and reported value was 37 mg/L at EFF-001A.		Violation	B	Report
1087668	07/06/2019	CAT1	Total Suspended Solids (TSS) Weekly Average (Mean) limit is 45 mg/L and reported value was 52 mg/L at EFF-001A.		Violation	B	Report
1066850	06/30/2019	OEV	Fecal Coliform 10% for 30 days limit is 1100 MPN/100 mL and reported value was 1600 MPN/100 mL at EFF-001A.		Violation	B	Report
1066845	06/30/2019	CAT1	BOD5 @ 20 Deg. C, Percent Removal Monthly Average limit is 85 % and reported value was 84 % at EFF-001A.		Violation	B	Report
1066844	06/30/2019	CAT1	Biochemical Oxygen Demand (BOD) (5-day @ 20 Deg. C) Monthly Average limit is 30 mg/L and reported value was 48 mg/L at EFF-001A.		Violation	B	Report
1066848	06/30/2019	CAT1	Total Suspended Solids (TSS) Monthly Average limit is 30 mg/L and reported value was 60 mg/L at EFF-001A.		Violation	B	Report

1066849	06/30/2019	CAT1	Total Suspended Solids (TSS), Percent Removal Monthly Average limit is 85 % and reported value was 80 % at EFF-001A.		Violation	B	Report
1066843	06/22/2019	CAT1	Biochemical Oxygen Demand (BOD) (5-day @ 20 Deg. C) Weekly Average limit is 45 mg/L and reported value was 59 mg/L at EFF-001A.		Violation	B	Report
1066847	06/22/2019	CAT1	Total Suspended Solids (TSS) Weekly Average limit is 45 mg/L and reported value was 98 mg/L at EFF-001A.		Violation	B	Report
1066841	06/15/2019	CAT1	Biochemical Oxygen Demand (BOD) (5-day @ 20 Deg. C) Weekly Average limit is 45 mg/L and reported value was 62 mg/L at EFF-001A.		Violation	B	Report
1066846	06/15/2019	CAT1	Total Suspended Solids (TSS) Weekly Average limit is 45 mg/L and reported value was 78 mg/L at EFF-001A.		Violation	B	Report
1066837	06/07/2019	ATOX	Acute Toxicity 11 Sample 90th Percentile limit is 70 % survival and reported value was 55 % survival at EFF-001A.		Violation	A	Report
1066836	06/07/2019	ATOX	Acute Toxicity 11-Sample Median limit is 90 % survival and reported value was 85 % survival at EFF-001A.		Violation	A	Report
1066839	05/29/2019	CAT2	Chlorine, Total Residual Instantaneous Maximum limit is 0.0 mg/L and reported value was 0.2 mg/L at EFF-001A.		Violation	B	Report
1066835	04/12/2019	ATOX	Acute Toxicity 11 Sample 90th Percentile limit is 70 % survival and reported value was 55 % survival at EFF-001A.		Violation	A	Report
1066834	12/10/2018	ATOX	Acute Toxicity 11 Sample 90th Percentile limit is 70 % survival and reported value was 55 % survival at EFF-001A.		Violation	A	Report
1066833	11/05/2018	ATOX	Acute Toxicity 11 Sample 90th Percentile limit is 70 % survival and reported value was 45 % survival at EFF-001A.		Violation	A	Report
1054349	10/18/2018	Order Conditions	Secondary-treated, chlorinated, and dechlorinated wastewater discharged to Islais Creek from leak in the 36-inch force main from the Booster Pump Station to Discharge Point 001 (Pier 80 Outfall). Upwelling was first discovered on October 18, 2018, and the leak is ongoing as of December 26, 2018. On November 3, 2018, divers discovered that only the 36-inch force main is leaking. 5-day report received October 25, 2018, and subsequent updates received via email on November 1, 8, 16, 29, and December 7, 2018.	A temporary bypass is expected to be completed by February 2019. A rehabilitation and replacement project for both of the force mains is expected to be completed in the long-term. The SMR cover letter states that the project completion date is 2024.	Violation	B	Report
1048823	06/18/2018	ATOX	Acute Toxicity 11-Sample Median limit is 90 % survival and reported value was 85 % survival at EFF-001A.		Violation	A	Report
1048824	05/07/2018	ATOX	Acute Toxicity 11 Sample 90th Percentile limit is 70 % survival and reported value was 45 % survival at EFF-001A.		Violation	A	Report
1048822	05/07/2018	ATOX	Acute Toxicity 11-Sample Median limit is 90 % survival and reported value was 85 % survival at EFF-001A.		Violation	A	Report

Report displays most recent five years of violations. Refer to the Interactive Violation Report for more data.

Total Violations: 40 **Priority Violations: 0**

*Click the "(+/-) Violation Description" link to expand and contract the violation description.
*As of 5/20/2010, the Water Board's Enforcement Policy requires that all violations be classified as 1, 2 or 3, with class 1 being the highest. Prior to this, violations were simply classified as Yes or No. If a 123 classification has been assigned to a violation that occurred before this date, that classification data will be displayed instead of the Yes/No data.

Violation Types

ATOX = Acute Toxicity
CAT1 = Category 1 Pollutant (Effluent Violation for Group 1 Pollutant)
CAT2 = Category 2 Pollutant (Effluent Violation for Group 2 Pollutant)
Order Conditions = Order Conditions
OEV = Other Effluent Violation
UAUTHDISC = Unauthorized Discharge

Enforcement Actions

Enf Id	Enf Type	Enf Order No.	Effective Date	Status
452168	Admin Civil Liability	R2-2023-0004	04/04/2023	Active
445935	Clean-up and Abatement Order	R2-2021-0021	11/10/2021	Active
410218	Admin Civil Liability	R2-2016-1034	11/10/2016	Historical
398457	Notice of Violation		06/10/2014	Historical
390479	Admin Civil Liability	R2-2013-1026	08/28/2013	Historical
372444	Oral Communication		10/15/2009	Historical
354969	Admin Civil Liability	SWB-2008-2-0022	11/19/2008	Historical

141575	NPDES Permit	2	2 386009001	Historical	NPDMUNILRG	88-106	06/15/1988	None	Discharger	06/15/1988	None	Y
132143	NPDES Permit	2	2 386009001	Historical	NPDMUNILRG	R2-2003-0073	10/01/2003	10/01/2009	Discharger	08/20/2003	None	N
131370	NPDES Permit	2	2 386010001	Historical	NPDMUNILRG	R2-2002-0073	06/19/2002	04/01/2008	Discharger	10/25/2006	None	N

Total Regulatory Measures: 70

Violations within the past five years

Violation ID	Occurrence Date	Violation Type	Violation Description(+)	Violation Status	Priority	Source	Facility Name	Violated Reg. Meas. ID	Violated Reg. Meas. Order No.	Linked to Enf.
1115328	02/23/2023	Order Conditions	During the February 23-24 overnight storm, the Channel Pump Station (CHS) pump r	Violation	None	Report	SF-SE Water Pollution Control Plant, N-Point & Bayside	392750	R2-2013-0029	N
1115326	01/09/2023	Order Conditions	During the January 9 CSD event at the Mariposa outfall (Discharge Point No. CSD-	Violation	None	Report	SF-SE Water Pollution Control Plant, N-Point & Bayside	392750	R2-2013-0029	N
1115323	12/31/2022	Order Conditions	On New Year?s Eve at approximately 10:10 a.m., one of the two Northshore wet wea	Violation	None	Report	SF-SE Water Pollution Control Plant, N-Point & Bayside	392750	R2-2013-0029	N
1115322	04/08/2022	Unauthorized Discharge	Discharged approximately 55 gallons of hydraulic fluid from one of the Division	Violation	None	Report	SF-SE Water Pollution Control Plant, N-Point & Bayside	392750	R2-2013-0029	N
1115242	02/04/2023	CAT1	Total Suspended Solids (TSS) Weekly Average limit is 45.0 mg/L and reported valu	Violation	None	Report	SF - OCEANSIDE Water Pollution Control Plant	437599	R2-2019-0028	N
1115241	01/31/2023	CAT1	Total Suspended Solids (TSS), Percent Removal Monthly Average limit is 85	Violation	None	Report	SF - OCEANSIDE Water Pollution Control Plant	437599	R2-2019-0028	N
1115240	01/31/2023	CAT1	Total Suspended Solids (TSS) Monthly Average limit is 30 mg/L and reported value	Violation	None	Report	SF - OCEANSIDE Water Pollution Control Plant	437599	R2-2019-0028	N
1115238	01/10/2023	Order Conditions	Did not comply with wet weather plant operational requirements, as described in	Violation	None	Report	SF - OCEANSIDE Water Pollution Control Plant	437599	R2-2019-0028	N
1115237	01/03/2023	Order Conditions	Did not comply with wet weather plant operational requirements, as described in	Violation	None	Report	SF - OCEANSIDE Water Pollution Control Plant	437599	R2-2019-0028	N
1115236	01/01/2023	Order Conditions	Did not comply with wet weather plant operational requirements, as described in	Violation	None	Report	SF - OCEANSIDE Water Pollution Control Plant	437599	R2-2019-0028	N
1115235	12/31/2022	Order Conditions	Did not comply with wet weather plant operational requirements, as described in	Violation	None	Report	SF - OCEANSIDE Water Pollution Control Plant	437599	R2-2019-0028	N
1100564	12/16/2021	Unauthorized Discharge	Discharged approximately 40,000 gallons of treated and disinfected effluent from	Violation	None	Report	SF-SE Water Pollution Control Plant, N-Point & Bayside	392750	R2-2013-0029	N
1100520	10/24/2021	Order Conditions	SEP flow was not maintained at 250 MGD during a wet weather event, as required b	Violation	None	Report	SF-SE Water Pollution Control Plant, N-Point & Bayside	392750	R2-2013-0029	N
1100519	10/23/2021	Order Conditions	CSDs occurred in the Northshore Basin before the North Point Facility reached 13	Violation	None	Report	SF-SE Water Pollution Control Plant, N-Point & Bayside	392750	R2-2013-0029	N
1100518	10/21/2021	Order Conditions	SEP flow was not maintained at 250 MGD during the wet weather event as required	Violation	None	Report	SF-SE Water Pollution Control Plant, N-Point & Bayside	392750	R2-2013-0029	N
1100517	10/04/2021	ATOX	Acute Toxicity 11 Sample 90th Percentile limit is 70.0 % survival and reported v	Violation	None	Report	SF-SE Water Pollution Control Plant, N-Point & Bayside	392750	R2-2013-0029	Y
1097611	07/21/2021	ATOX	Acute Toxicity 11 Sample 90th Percentile limit is 70 % survival and reported val	Violation	None	Report	SF-SE Water Pollution Control Plant, N-Point & Bayside	392750	R2-2013-0029	Y
1096743	08/05/2021	Unauthorized Discharge	Discharged approximately 64,000 gallons of secondary treated, disinfected wastew	Violation	None	Report	SF-SE Water Pollution Control Plant, N-Point & Bayside	392750	R2-2013-0029	N
1091449	02/15/2021	Order Conditions	Did not comply with wet weather plant operational requirements, as described in	Violation	N	Report	SF - OCEANSIDE Water Pollution Control Plant	437599	R2-2019-0028	N
1087679	12/23/2020	Unauthorized Discharge	A leak from a joint on the forty-two-inch Islais Creek force main that conveys t	Violation	N	Report	SF-SE Water Pollution Control Plant, N-Point & Bayside	392750	R2-2013-0029	N
1087673	12/17/2020	Order Conditions	A discharge occurred at CSD-029 before the Mariposa Pump Station reached 10 MGD,	Violation	N	Report	SF-SE Water Pollution Control Plant, N-Point & Bayside	392750	R2-2013-0029	N
1087672	11/02/2020	ATOX	Acute Toxicity 11-Sample Median limit is 90 % survival and reported value was 85	Violation	N	Report	SF-SE Water Pollution Control Plant, N-Point & Bayside	392750	R2-2013-0029	Y
1087671	06/10/2020	Unauthorized Discharge	On June 10-12, secondary treated and disinfected wastewater was discharged to Sa	Violation	N	Report	SF-SE Water Pollution Control Plant, N-Point & Bayside	392750	R2-2013-0029	N
1087670	12/22/2019	Order Conditions	The Mariposa Pump Station (MPS) did not maintain peak wet weather capacity (10 M	Violation	N	Report	SF-SE Water Pollution Control Plant, N-Point & Bayside	392750	R2-2013-0029	N
1087669	07/31/2019	CAT1	Total Suspended Solids (TSS) Monthly Average (Mean) limit is 30 mg/L and reporte	Violation	N	Report	SF-SE Water Pollution Control Plant, N-Point & Bayside	392750	R2-2013-0029	Y
1087668	07/06/2019	CAT1	Total Suspended Solids (TSS) Weekly Average (Mean) limit is 45 mg/L and reported	Violation	N	Report	SF-SE Water Pollution Control Plant, N-Point & Bayside	392750	R2-2013-0029	Y

1087666	08/17/2019	Unauthorized Discharge	On Saturday, August 17, 2019, an estimated 1.8 million gallons (MG) of primary t	Violation	N	Report	SF - OCEANSIDE Water Pollution Control Plant	360578	R2-2009-0062	N
1087657	12/17/2020	Order Conditions	Did not comply with wet weather plant operational requirements, as described in	Violation	N	Report	SF - OCEANSIDE Water Pollution Control Plant	437599	R2-2019-0028	N
1076566	03/09/2020	ATOX	Acute Toxicity 11 Sample 90th Percentile limit is 70 % survival and reported val	Violation	N	Report	SF-SE Water Pollution Control Plant, N-Point & Bayside	392750	R2-2013-0029	Y
1076565	03/02/2020	ATOX	Acute Toxicity 11 Sample 90th Percentile limit is 70 % survival and reported val	Violation	N	Report	SF-SE Water Pollution Control Plant, N-Point & Bayside	392750	R2-2013-0029	Y
1076485	04/06/2020	Order Conditions	Did not comply with wet weather plant operational requirements, as described in	Violation	N	Report	SF - OCEANSIDE Water Pollution Control Plant	437599	R2-2019-0028	N
1068871	11/26/2019	Order Conditions	Did not comply with wet weather plant operational requirements, as described in	Violation	N	Report	SF - OCEANSIDE Water Pollution Control Plant	360578	R2-2009-0062	N
1066998	07/31/2019	CAT1	Oil and Grease Monthly Average limit is 10 mg/L and reported value was 12 mg/L a	Violation	N	Report	SF-SE Water Pollution Control Plant, N-Point & Bayside	392750	R2-2013-0029	Y
1066850	06/30/2019	OEV	Fecal Coliform 10% for 30 days limit is 1100 MPN/100 mL and reported value was 1	Violation	N	Report	SF-SE Water Pollution Control Plant, N-Point & Bayside	392750	R2-2013-0029	Y
1066849	06/30/2019	CAT1	Total Suspended Solids (TSS), Percent Removal Monthly Average limit is 85 % and	Violation	N	Report	SF-SE Water Pollution Control Plant, N-Point & Bayside	392750	R2-2013-0029	Y
1066848	06/30/2019	CAT1	Total Suspended Solids (TSS) Monthly Average limit is 30 mg/L and reported value	Violation	N	Report	SF-SE Water Pollution Control Plant, N-Point & Bayside	392750	R2-2013-0029	Y
1066847	06/22/2019	CAT1	Total Suspended Solids (TSS) Weekly Average limit is 45 mg/L and reported value	Violation	N	Report	SF-SE Water Pollution Control Plant, N-Point & Bayside	392750	R2-2013-0029	Y
1066846	06/15/2019	CAT1	Total Suspended Solids (TSS) Weekly Average limit is 45 mg/L and reported value	Violation	N	Report	SF-SE Water Pollution Control Plant, N-Point & Bayside	392750	R2-2013-0029	Y
1066845	06/30/2019	CAT1	BOD5 @ 20 Deg. C, Percent Removal Monthly Average limit is 85 % and reported val	Violation	N	Report	SF-SE Water Pollution Control Plant, N-Point & Bayside	392750	R2-2013-0029	Y
1066844	06/30/2019	CAT1	Biochemical Oxygen Demand (BOD) (5-day @ 20 Deg. C) Monthly Average limit is 30	Violation	N	Report	SF-SE Water Pollution Control Plant, N-Point & Bayside	392750	R2-2013-0029	Y
1066843	06/22/2019	CAT1	Biochemical Oxygen Demand (BOD) (5-day @ 20 Deg. C) Weekly Average limit is 45 m	Violation	N	Report	SF-SE Water Pollution Control Plant, N-Point & Bayside	392750	R2-2013-0029	Y
1066841	06/15/2019	CAT1	Biochemical Oxygen Demand (BOD) (5-day @ 20 Deg. C) Weekly Average limit is 45 m	Violation	N	Report	SF-SE Water Pollution Control Plant, N-Point & Bayside	392750	R2-2013-0029	Y
1066839	05/29/2019	CAT2	Chlorine, Total Residual Instantaneous Maximum limit is 0.0 mg/L and reported va	Violation	N	Report	SF-SE Water Pollution Control Plant, N-Point & Bayside	392750	R2-2013-0029	Y
1066837	06/07/2019	ATOX	Acute Toxicity 11 Sample 90th Percentile limit is 70 % survival and reported val	Violation	N	Report	SF-SE Water Pollution Control Plant, N-Point & Bayside	392750	R2-2013-0029	Y
1066836	06/07/2019	ATOX	Acute Toxicity 11-Sample Median limit is 90 % survival and reported value was 85	Violation	N	Report	SF-SE Water Pollution Control Plant, N-Point & Bayside	392750	R2-2013-0029	Y
1066835	04/12/2019	ATOX	Acute Toxicity 11 Sample 90th Percentile limit is 70 % survival and reported val	Violation	N	Report	SF-SE Water Pollution Control Plant, N-Point & Bayside	392750	R2-2013-0029	Y
1066834	12/10/2018	ATOX	Acute Toxicity 11 Sample 90th Percentile limit is 70 % survival and reported val	Violation	N	Report	SF-SE Water Pollution Control Plant, N-Point & Bayside	392750	R2-2013-0029	Y
1066833	11/05/2018	ATOX	Acute Toxicity 11 Sample 90th Percentile limit is 70 % survival and reported val	Violation	N	Report	SF-SE Water Pollution Control Plant, N-Point & Bayside	392750	R2-2013-0029	Y
1064928	01/25/2019	Unauthorized Discharge	Three discharges of untreated wastewater through SFPUC"s Oceanside Plant on 1/2	Violation	N	Report	SF - OCEANSIDE Water Pollution Control Plant	360578	R2-2009-0062	N
1054392	11/24/2018	CAT1	Total Suspended Solids (TSS) Weekly Average limit is 45 mg/L and reported value	Violation	N	Report	SF - OCEANSIDE Water Pollution Control Plant	360578	R2-2009-0062	Y
1054349	10/18/2018	Order Conditions	Secondary-treated, chlorinated, and dechlorinated wastewater discharged to Islai	Violation	N	Report	SF-SE Water Pollution Control Plant, N-Point & Bayside	392750	R2-2013-0029	N
1048824	05/07/2018	ATOX	Acute Toxicity 11 Sample 90th Percentile limit is 70 % survival and reported val	Violation	N	Report	SF-SE Water Pollution Control Plant, N-Point & Bayside	392750	R2-2013-0029	Y
1048823	06/18/2018	ATOX	Acute Toxicity 11-Sample Median limit is 90 % survival and reported value was 85	Violation	N	Report	SF-SE Water Pollution Control Plant, N-Point & Bayside	392750	R2-2013-0029	Y
1048822	05/07/2018	ATOX	Acute Toxicity 11-Sample Median limit is 90 % survival and reported value was 85	Violation	N	Report	SF-SE Water Pollution Control Plant, N-Point & Bayside	392750	R2-2013-0029	Y

Report currently showing last five years of violations. Click here to return to viewing one year of violations.
Refer to the Interactive Violation Report for more data.

Total Violations: 54

*Click the "(+/-) Violation Description" link to expand and contract the violation description.

Enforcement Actions

ATTACHMENT B

California Home Friday, June 02, 2023

CA.GOV CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY
STATE WATER RESOURCES CONTROL BOARD

California Integrated Water Quality System Project (CIWQS)

SSO Public Report - Detail Page

Here is the detail page of your SSO public report search for the selected region, responsible agency, or collection system. These results correspond to the following search criteria:

SEARCH CRITERIA: [REFINE SEARCH]

- Agency (**San Francisco Public Utilities Commission**)
- Spill Type (**sso_cat1_2_3**)

The table below presents important details for all sewage discharge locations, as submitted through individual SSO reports, which meet the search criteria selected. If data is not shown for a particular field, it means the Enrollee did not provide the information and was not required to do so. To view the entire SSO report for a specific sewage discharge location, please select the corresponding EVENT ID.

DRILLDOWN HISTORY: [GO BACK TO SUMMARY PAGE]

REGION: **2**

[VIEW PRINTER FRIENDLY VERSION]

EVENT ID	Region	Responsible Agency	Collection System	SSO Category	Start Date	SSO Vol	Vol of SSO Recovered	Vol of SSO Reached Surface Water	SSO Failure Point	WDID
888125	2	San Francisco Public Utilities Commission	San Francisco City Combined CS	Category 3	2023-05-02 05:15:00.0	750	750	0	Gravity Mainline	2SSO10193-C
887434	2	San Francisco Public Utilities Commission	San Francisco City Combined CS	Category 2	2023-03-28 14:20:00.0	286,221	286,221	0	No failure occurred. Combined system is designed to accept and convey stormwater. Surcharged because of intense and substantial rainfall	2SSO10193-C
887134	2	San Francisco Public Utilities Commission	San Francisco City Combined CS	Category 2	2023-03-14 08:00:00.0	728,413	728,413	0	No failure. System was over capacity due to rain event.	2SSO10193-C
887135	2	San Francisco Public Utilities Commission	San Francisco City Combined CS	Category 2	2023-03-14 07:55:00.0	630,800	630,800	0	No failure / Capacity issue	2SSO10193-C
887444	2	San Francisco Public Utilities Commission	San Francisco City Combined CS	Category 2	2023-03-09 20:55:00.0	885,340	885,340	0	No failure/ capacity issue	2SSO10193-C
887547	2	San Francisco Public Utilities Commission	San Francisco City Combined CS	Category 2	2023-03-09 20:55:00.0	946,969	946,969	0	Flow returned to the combined sewer system once hydraulic grade line dropped below surface	2SSO10193-C
886599	2	San Francisco Public Utilities Commission	San Francisco City Combined CS	Category 2	2023-02-23 23:55:00.0	56,303	56,303	0	No failure occurred - combined system is designed to accept and convey stormwater. System surcharged because of intense and substantial rainfall.	2SSO10193-C

886601	2	San Francisco Public Utilities Commission	San Francisco City Combined CS	Category 2	2023-02-23 23:55:00.0	23,082	23,082	0	Flow returned to the combined sewer system once system hydraulic grade line dropped below street surface	2SSO10193-C
885665	2	San Francisco Public Utilities Commission	San Francisco City Combined CS	Category 2	2023-01-20 06:30:00.0	2,800	2,800	0	Gravity Mainline	2SSO10193-C
885834	2	San Francisco Public Utilities Commission	San Francisco City Combined CS	Category 2	2023-01-19 09:00:00.0	23,400	23,400	0	Gravity Mainline	2SSO10193-C
885547	2	San Francisco Public Utilities Commission	San Francisco City Combined CS	Category 2	2023-01-14 07:00:00.0	17,200	17,200	0	No failure occurred - combined system is designed to accept and convey stormwater. System surcharged because of intense and substantial rainfall.	2SSO10193-C
885546	2	San Francisco Public Utilities Commission	San Francisco City Combined CS	Category 2	2023-01-14 06:55:00.0	480,652	480,652	0	No failure occurred - combined system is designed to accept and convey stormwater. System surcharged because of intense and substantial rainfall.	2SSO10193-C
885459	2	San Francisco Public Utilities Commission	San Francisco City Combined CS	Category 2	2023-01-09 02:05:00.0	143,000	143,000	0	No failure occurred - combined system is designed to accept and convey stormwater. System surcharged because of intense and substantial rainfall.	2SSO10193-C
885453	2	San Francisco Public Utilities Commission	San Francisco City Combined CS	Category 2	2023-01-09 02:00:00.0	257,700	257,700	0	No failure occurred - combined system is designed to accept and convey stormwater. System surcharged because of intense and substantial rainfall.	2SSO10193-C
885474	2	San Francisco Public Utilities Commission	San Francisco City Combined CS	Category 2	2023-01-04 18:20:00.0	40,661	40,661	0	No failure occurred - combined system is designed to accept and convey stormwater. System surcharged because of intense and substantial rainfall.	2SSO10193-C
885473	2	San Francisco Public Utilities Commission	San Francisco City Combined CS	Category 2	2023-01-04 18:15:00.0	131,216	131,216	0	No failure occurred - combined system is designed to accept and convey stormwater. System surcharged because of intense and substantial rainfall.	2SSO10193-C
885460	2	San Francisco Public Utilities Commission	San Francisco City Combined CS	Category 2	2022-12-31 22:00:00.0	50,932	50,932	0	Gravity Mainline	2SSO10193-C
885574	2	San Francisco Public Utilities Commission	San Francisco City Combined CS	Category 2	2022-12-31 12:15:00.0	20,263,400	20,263,400	0	No failure occurred - combined system is designed to accept and convey stormwater. System surcharged because of intense and substantial rainfall.	2SSO10193-C
885158	2	San Francisco Public Utilities Commission	San Francisco City Combined CS	Category 1	2022-12-31 10:15:00.0	18,573,800	16,273,800	2,300,000	No failure occurred - combined system is designed to accept and convey stormwater. System surcharged because of intense and substantial rainfall.	2SSO10193-C
885450	2	San Francisco Public Utilities Commission	San Francisco City Combined CS	Category 2	2022-12-31 10:10:00.0	74,290,300	74,290,300	0	No failure occurred - combined system is designed to accept and convey stormwater. System surcharged because of intense and substantial rainfall.	2SSO10193-C

885561	2	San Francisco Public Utilities Commission	San Francisco City Combined CS	Category 2	2022-12-31 00:35:00.0	1,405,900	1,405,900	0	No failure occurred - combined system is designed to accept and convey stormwater. System surcharged because of intense and substantial rainfall.	2SSO10193-C
885835	2	San Francisco Public Utilities Commission	San Francisco City Combined CS	Category 2	2022-12-30 20:55:00.0	972,000	972,000	0	Gravity Mainline	2SSO10193-C
885068	2	San Francisco Public Utilities Commission	San Francisco City Combined CS	Category 2	2022-12-27 02:05:00.0	54,000	54,000	0	No failure occurred - combined system is designed to accept and convey stormwater. System surcharged because of intense and substantial rainfall.	2SSO10193-C
884956	2	San Francisco Public Utilities Commission	San Francisco City Combined CS	Category 2	2022-12-21 12:30:00.0	3,856	0	0	Gravity Mainline	2SSO10193-C
884411	2	San Francisco Public Utilities Commission	San Francisco City Combined CS	Category 3	2022-11-22 08:04:00.0	762	0	0	Gravity Mainline	2SSO10193-C
884311	2	San Francisco Public Utilities Commission	San Francisco City Combined CS	Category 3	2022-11-08 04:30:00.0	701	50	0	Gravity Mainline	2SSO10193-C
884208	2	San Francisco Public Utilities Commission	San Francisco City Combined CS	Category 3	2022-11-01 12:00:00.0	529	0	0	Gravity Mainline	2SSO10193-C
883750	2	San Francisco Public Utilities Commission	San Francisco City Combined CS	Category 3	2022-10-06 12:00:00.0	885	885	0	Gravity Mainline	2SSO10193-C
883503	2	San Francisco Public Utilities Commission	San Francisco City Combined CS	Category 3	2022-09-14 10:40:00.0	598	0	0	Manhole	2SSO10193-C
883057	2	San Francisco Public Utilities Commission	San Francisco City Combined CS	Category 3	2022-08-22 08:30:00.0	565	565	0	Gravity Mainline	2SSO10193-C
883179	2	San Francisco Public Utilities Commission	San Francisco City Combined CS	Category 3	2022-08-16 17:17:00.0	2	0	0	Gravity Mainline	2SSO10193-C
881690	2	San Francisco Public Utilities Commission	San Francisco City Combined CS	Category 3	2022-05-25 13:30:00.0	191	0	0	Gravity Mainline	2SSO10193-C
881528	2	San Francisco Public Utilities Commission	San Francisco City Combined CS	Category 3	2022-05-20 10:30:00.0	32	32	0	Gravity Mainline	2SSO10193-C
881538	2	San Francisco Public Utilities Commission	San Francisco City Combined CS	Category 3	2022-05-11 12:00:00.0	775	0	0	Gravity Mainline	2SSO10193-C
881302	2	San Francisco Public Utilities Commission	San Francisco City Combined CS	Category 3	2022-05-09 13:30:00.0	570	570	0	Gravity Mainline	2SSO10193-C

880688	2	San Francisco Public Utilities Commission	San Francisco City Combined CS	Category 3	2022-04-10 11:00:00.0	18	18	0	Gravity Mainline	2SSO10193-C
880747	2	San Francisco Public Utilities Commission	San Francisco City Combined CS	Category 3	2022-02-25 09:45:00.0	97	97	0	Gravity Mainline	2SSO10193-C
879776	2	San Francisco Public Utilities Commission	San Francisco City Combined CS	Category 3	2022-02-19 15:20:00.0	95	0	0	Gravity Mainline	2SSO10193-C
879475	2	San Francisco Public Utilities Commission	San Francisco City Combined CS	Category 2	2022-02-16 00:00:00.0	17,773	17,773	0	Gravity Mainline	2SSO10193-C
879254	2	San Francisco Public Utilities Commission	San Francisco City Combined CS	Category 3	2022-01-07 06:00:00.0	75	0	0	Manhole	2SSO10193-C
882627	2	San Francisco Public Utilities Commission	San Francisco City Combined CS	Category 2	2021-12-21 12:00:00.0	3,420	0	0	Gravity Mainline	2SSO10193-C
877502	2	San Francisco Public Utilities Commission	San Francisco City Combined CS	Category 2	2021-11-08 23:15:00.0	46,659	46,659	0	Gravity Mainline	2SSO10193-C
877142	2	San Francisco Public Utilities Commission	San Francisco City Combined CS	Category 1	2021-10-24 15:05:00.0	4,900,000	3,500,000	1,400,000	No failure occurred. The combined sewer system is designed to accept and convey stormwater. The system surcharged because of intense (> 50 year return period) and substantial (> 7 inches) rainfall.	2SSO10193-C
877139	2	San Francisco Public Utilities Commission	San Francisco City Combined CS	Category 2	2021-10-23 23:45:00.0	2,500,000	2,500,000	0	No failure occurred. The combined sewer system is designed to accept and convey stormwater. The system surcharged because of substantial (>7 inches) rainfall.	2SSO10193-C
876093	2	San Francisco Public Utilities Commission	San Francisco City Combined CS	Category 3	2021-08-16 09:30:00.0	17	17	0	Gravity Mainline	2SSO10193-C
875344	2	San Francisco Public Utilities Commission	San Francisco City Combined CS	Category 2	2021-07-10 08:44:00.0	1,708	1,708	0	Gravity Mainline	2SSO10193-C
875074	2	San Francisco Public Utilities Commission	San Francisco City Combined CS	Category 3	2021-06-24 19:00:00.0	805	800	0	Gravity Mainline	2SSO10193-C
874839	2	San Francisco Public Utilities Commission	San Francisco City Combined CS	Category 3	2021-06-05 16:28:00.0	4	4	0	Gravity Mainline	2SSO10193-C
874025	2	San Francisco Public Utilities Commission	San Francisco City Combined CS	Category 3	2021-04-24 06:30:00.0	3	3	0	Gravity Mainline	2SSO10193-C
873336	2	San Francisco Public Utilities Commission	San Francisco City Combined CS	Category 2	2021-03-22 17:00:00.0	7,650	7,650	0	Gravity Mainline	2SSO10193-C

873105	2	San Francisco Public Utilities Commission	San Francisco City Combined CS	Category 2	2021-03-14 08:00:00.0	1,001	0	0	Gravity Mainline	2SSO10193-C
872866	2	San Francisco Public Utilities Commission	San Francisco City Combined CS	Category 2	2021-03-10 14:30:00.0	5,240	5,240	0	Gravity Mainline	2SSO10193-C
872737	2	San Francisco Public Utilities Commission	San Francisco City Combined CS	Category 3	2021-02-09 20:00:00.0	60	60	0	Gravity Mainline	2SSO10193-C
872779	2	San Francisco Public Utilities Commission	San Francisco City Combined CS	Category 3	2021-02-05 05:00:00.0	515	0	0	Gravity Mainline	2SSO10193-C
872581	2	San Francisco Public Utilities Commission	San Francisco City Combined CS	Category 3	2021-02-02 09:30:00.0	251	251	0	Gravity Mainline	2SSO10193-C
872269	2	San Francisco Public Utilities Commission	San Francisco City Combined CS	Category 3	2021-01-27 18:45:00.0	3	0	0	Gravity Mainline	2SSO10193-C
872190	2	San Francisco Public Utilities Commission	San Francisco City Combined CS	Category 2	2021-01-25 17:00:00.0	14,180	14,180	0	Gravity Mainline	2SSO10193-C
872348	2	San Francisco Public Utilities Commission	San Francisco City Combined CS	Category 3	2021-01-25 06:30:00.0	29	2	0	Gravity Mainline	2SSO10193-C
871590	2	San Francisco Public Utilities Commission	San Francisco City Combined CS	Category 3	2021-01-15 09:30:00.0	3	3	0	Gravity Mainline	2SSO10193-C
871441	2	San Francisco Public Utilities Commission	San Francisco City Combined CS	Category 2	2021-01-04 10:30:00.0	1,573	493	0	Gravity Mainline	2SSO10193-C
871391	2	San Francisco Public Utilities Commission	San Francisco City Combined CS	Category 2	2020-12-31 12:30:00.0	4,030	4,030	0	Gravity Mainline	2SSO10193-C
871390	2	San Francisco Public Utilities Commission	San Francisco City Combined CS	Category 2	2020-12-30 18:00:00.0	1,653	493	0	Gravity Mainline	2SSO10193-C
869455	2	San Francisco Public Utilities Commission	San Francisco City Combined CS	Category 2	2020-09-27 18:00:00.0	3,354	3,354	0	Gravity Mainline	2SSO10193-C
870103	2	San Francisco Public Utilities Commission	San Francisco City Combined CS	Category 3	2020-09-27 04:00:00.0	7	0	0	Gravity Mainline	2SSO10193-C
870104	2	San Francisco Public Utilities Commission	San Francisco City Combined CS	Category 3	2020-09-17 13:00:00.0	15	15	0	Gravity Mainline	2SSO10193-C
869216	2	San Francisco Public Utilities Commission	San Francisco City Combined CS	Category 2	2020-08-22 14:15:00.0	4,245	4,245	0	Pump Station-Mechanical	2SSO10193-C

869344	2	San Francisco Public Utilities Commission	San Francisco City Combined CS	Category 3	2020-07-15 17:00:00.0	55	55	0	Gravity Mainline	2SSO10193-C
869233	2	San Francisco Public Utilities Commission	San Francisco City Combined CS	Category 3	2020-05-23 09:00:00.0	744	0	0	Gravity Mainline	2SSO10193-C

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