Law Office of Jack Silver

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Via Certified Mail –
Return Receipt Requested

August 7, 2023

Mr. Jonathan Borrego, City Manager
Member of the City Council
City of Oceanside
300 North Coast Hwy
Oceanside, CA 92054

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

Dear Mr. Borrego and Members of the City Council,

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 City of Oceanside's operation of the La Salina Wastewater Treatment Plant ("Facility") and associated sewer collection system.

River Watch hereby places the City of Oceanside ("City"), as owner and operator of the Facility 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 or an order issued by the State with respect to such a standard or limitation pursuant to CWA § 301(a), 33 U.S.C. § 1311(a), and the Regional Water Quality Control Board, San Diego Bay Region ("RWQCB-SD"), Water Quality Control Plan ("Basin Plan"), as the result of violations of the City's National Pollution Discharge Elimination System ("NPDES") Permit.

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 a discharger, which has been issued a permit 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 Permit.

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 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-SD.

While delegating authority to administer the NPDES permitting system, the CWA provides that enforcement of the statute's permitting requirements relating to any permit condition, including but not limited to, discharge prohibitions, effluent standards, receiving water limitations and the like 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 order which is the subject of this Notice is NPDES No. CA0107433, *"Waste Discharge Requirements for the City of Oceanside San Luis Rey Water Reclamation Facility, La Salina Wastewater Treatment Plant, and Mission Basin Groundwater Purification Facility Discharge to the Pacific Ocean Through the Oceanside Ocean Outfall,"* regulating the City of Oceanside as the Discharger and the Facility identified as La Salina Wastewater Treatment Plant and its collection system ("NPDES Permit"). River Watch has identified specific violations of the NPDES Permit 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 Permit.

2. Activity Alleged to Constitute a Violation

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

A. Violations of Effluent Limitations and Discharge Prohibitions

River Watch's review of the City's Self-Monitoring Reports identifies numerous violations of the effluent limitations imposed under NPDES Permit Section IV: Table 4: *Effluent Limitations at Monitoring Location M-001*: Fecal Coliform, Geomean, Enteroccocus, Settleable Solids; and under NPDES Permit Attachment E: *Monitoring and Reporting Program* as detailed in **Attachment A** to this Notice.

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

Discharges in excess of the Receiving Water Limitations (NPDES Permit 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.

C. 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 Facility. The NPDES Permit lists the beneficial uses of the Pacific Ocean, a water of the United States, including, but not limited to, industrial service supply, navigation, water contact recreation, non-contact recreation, commercial and sport fishing, preservation of biological habitats of special significance, wildlife habitat, rare, threatened, or endangered species, marine habitat, aquaculture migration of aquatic organisms, spawning, reproduction, and/or early development, and shellfish harvesting.

1. Sanitary Sewer Overflows ("SSOs")

SSOs, in which untreated sewage is discharged above ground from the sewer collection system prior to reaching the Facility, 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 sewer 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 Foss Lake Habitat, East Pond, Pilgrim Creek, Luis Rey River, Buena Vista Creek, Loma Alta Creek, and the Pacific Ocean - all waters of the United States. 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 – Summary Page, **Attachment B** to this Notice, identifies **100 SSOs,** resulting in **7,795,858** gallons of raw sewage being discharged into the environment. Of this total volume, the City acknowledges at least **6,987,199** gallons, or **89%** of the total, reached a surface water. A review of these records indicates an even greater percentage of SSOs reached drainage to a surface water or a surface water itself. Of the 7,795,858 gallons of sewage spilled, the City reported only 728,908 gallons as recovered, with the remaining sewage being discharged into the environment posing both a nuisance pursuant to Calif. Water Code § 13050(m), and an imminent and substantial endangerment to public health and the environment.

The City's CIWQS SSO Public Report Detail Page specifically also confirms that 89% of recent SSOs reported reached a water of the United States. **Attachment C** to this Notice provides a full listing of the City's SSOs.

2. Inadequate Reporting of Discharges

Full and complete reporting of SSOs is essential to gauging their impact on public health and the environment. The City's SSO Reports, which should reveal critical details about each of the 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 review of the times when the City received notification of an SSO, the times of its response, and the times at which the SSO ended, too often appear as unlikely estimations. 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 this critical information there is a danger that the duration and volume of a spill will be underestimated.

3. Failure to Warn

River Watch contends the City is understating the significance of the impacts of its SSOs by failing to post health warning signs for discharges reaching a surface water.

4. Failure to Mitigate Impacts

NPDES Permit, 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 adversely 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 Permit, the City is subject to the requirements of the *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.

A critical remedial measure is the performance of adequate sampling to determine the nature and the impact of the release. As the City is underestimating SSOs which reach surface waters, River Watch contends the sampling on most SSOs is inadequate. For example, no samples were taken on the SSOs for the spill events identified as follows: Event ID Nos: 880024, 877653, 877444, 875102, 873497, 866074, 866073, 861818, 861201, 858118, 856153, 851727, and 846533.

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.

5. Sewer Collection System Subsurface Discharges

It is a well-established fact that exfiltration caused by pipeline cracks and other structural defects in a sewer 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 sewer collection system into groundwater hydrologically connected to surface waters including, but not limited to, Foss Lake Habitat, East Pond, Pilgrim Creek, Luis Rey River, Buena Vista Creek, Loma Alta Creek and the Pacific Ocean. Surface waters become contaminated with pollutants including human pathogens. Chronic failures in the sewer 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 of Oceanside and those of its employees responsible for compliance with the CWA and with any applicable state and federal regulations and permits.

The Wastewater Division of the City's Water Utilities Department collects, treats, and disposes of all of the City's sewage at the San Luis Rey Wastewater Treatment Plant and the Facility. Between the two plants a population of approximately 180,000 receives municipal wastewater treatment services. The service area covers the City as well as a portion of Vista, California

Located at 1330 Tait Street in Oceanside, adjacent to the mouth of Loma Alta Creek, the Facility was constructed in 1949 and treats sewage from areas west of I-5, downtown and along the coast. Secondary waste is treated through conventional biological processes, followed by clarification. The Facility discharges at the Oceanside Ocean Outfall. Screenings and solids are collected and transported to Cooper Mountain Landfill in Welton, Arizona.

4. The Location of the Alleged Violation

The location or 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 Facility and associated sewer 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 August 7, 2018, 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, referred to throughout this notice as "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 is 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 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.
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708 Gravenstein Hwy. North, #407
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138 Ridgeway Avenue
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RECOMMENDED REMEDIAL MEASURES

River Watch looks forward to meeting with the City's staff to tailor remedial measures to the specific operation of the Facility and associated sewer 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.

6. Consistent with Article X, Section 2 of the California Constitution and California Water Code Section 100 which prevents the waste or unreasonable use of water, implementation of programs and projects providing for the recycling and/or reuse of treated wastewater discharged from the Facility.

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 the 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

ATTACHMENT A

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.
1117688	01/31/2023	Deficient Monitoring	The Discharger failed to monitor the groundwater at MW-A-1, MW-A-2, MW-B-1, MW-B	Violation	None	Report	San Luis Rey Water Reclamation Facility - Recycled Water and Pure Water	443138	R9-2021-0100	N
1117687	01/30/2023	Deficient Monitoring	The Discharger failed to monitor effluent leaving the Facility at M-008 for seve	Violation	None	Report	San Luis Rey Water Reclamation Facility - Recycled Water and Pure Water	443138	R9-2021-0100	N
1117686	01/28/2022	Deficient Monitoring	The Discharger failed to initiate weekly sampling after a chlorate effluent samp	Violation	None	Report	San Luis Rey Water Reclamation Facility - Recycled Water and Pure Water	443138	R9-2021-0100	N
1116158	03/16/2023	Surface Water	Fecal coliform exceeded limit at S2	Violation	N	eSMR	Oceanside Ocean Outfall	434521	R9-2019-0166	N
1116157	03/18/2023	Surface Water	Geomean for fecal exceeded at S3	Violation	N	eSMR	Oceanside Ocean Outfall	434521	R9-2019-0166	N
1116156	03/16/2023	Surface Water	Enteroccocus exceeded at S3	Violation	N	eSMR	Oceanside Ocean Outfall	434521	R9-2019-0166	N
1116155	03/15/2023	Surface Water	fecal coliform exceeded at S3	Violation	N	eSMR	Oceanside Ocean Outfall	434521	R9-2019-0166	N
1116154	03/19/2023	Surface Water	Geomean for fecal exceeded at S3	Violation	N	eSMR	Oceanside Ocean Outfall	434521	R9-2019-0166	N
1116153	03/27/2023	Surface Water	Geomean for entero exceeded	Violation	N	eSMR	Oceanside Ocean Outfall	434521	R9-2019-0166	N
1116152	03/18/2023	Surface Water	Geomean for entero exceeded	Violation	N	eSMR	Oceanside Ocean Outfall	434521	R9-2019-0166	N
1116151	03/20/2023	Surface Water	fecal exceedance at S4	Violation	N	eSMR	Oceanside Ocean Outfall	434521	R9-2019-0166	N
1116150	03/17/2023	Surface Water	geomean for entro exceeded at S3	Violation	N	eSMR	Oceanside Ocean Outfall	434521	R9-2019-0166	N
1116149	03/20/2023	Surface Water	Geomean for entero exceeded at S3	Violation	N	eSMR	Oceanside Ocean Outfall	434521	R9-2019-0166	N
1116148	03/16/2023	Surface Water	Exceeded limit for fecal coiform at S2	Violation	N	eSMR	Oceanside Ocean Outfall	434521	R9-2019-0166	N
1116147	03/15/2023	Surface Water	Exceeded limit for enterococcus at S3	Violation	N	eSMR	Oceanside Ocean Outfall	434521	R9-2019-0166	N
1116146	03/15/2023	Surface Water	Exceeded limit for enterococcus at S2	Violation	N	eSMR	Oceanside Ocean Outfall	434521	R9-2019-0166	N
1113896	01/17/2023	Surface Water	S-5 location exceeded the single sample maximum limitation for fecal coliforms	Violation	N	eSMR	Oceanside Ocean Outfall	434521	R9-2019-0166	N
1113895	01/03/2023	Surface Water	S-3 location exceeded the single sample maximum limitation for fecal coliforms	Violation	N	eSMR	Oceanside Ocean Outfall	434521	R9-2019-0166	N
1113894	01/17/2023	Surface Water	S-4 location exceeded the single sample maximum limitation for fecal coliforms	Violation	N	eSMR	Oceanside Ocean Outfall	434521	R9-2019-0166	N
1113893	01/17/2023	Surface Water	S-2 location exceeded the single sample maximum limitation for fecal coliforms	Violation	N	eSMR	Oceanside Ocean Outfall	434521	R9-2019-0166	N
1113892	01/17/2023	Surface Water	S-3 location exceeded the single sample maximum limitation for fecal coliforms	Violation	N	eSMR	Oceanside Ocean Outfall	434521	R9-2019-0166	N
1112688	12/12/2022	Surface Water	S1 exceeded the single sample maximum for fecal coliform.	Violation	N	eSMR	Oceanside Ocean Outfall	434521	R9-2019-0166	N
1112567	11/14/2022	Surface Water	Fecal coliform was over the maximum limit	Violation	N	eSMR	Oceanside Ocean Outfall	434521	R9-2019-0166	N
1112566	11/14/2022	Surface Water	Fecal coliform was over the maximum limit	Violation	N	eSMR	Oceanside Ocean Outfall	434521	R9-2019-0166	N
1112565	11/14/2022	Surface Water	Fecal coliform was over the maximum limit	Violation	N	eSMR	Oceanside Ocean Outfall	434521	R9-2019-0166	N
1109720	07/25/2022	Surface Water	The 07/25/22 A-2 mid depth location exceeded the single sample maximum for fecal	Violation	N	eSMR	Oceanside Ocean Outfall	434521	R9-2019-0166	N
1109691	09/26/2022	Surface Water	The 09/26/22 S-4 location exceeded the single sample maximum limitation for feca	Violation	N	eSMR	Oceanside Ocean Outfall	434521	R9-2019-0166	N
1101264	01/03/2022	CAT1	Settleable Solids Instantaneous Maximum limit is 3 ml/L and reported value was 7	Violation	N	eSMR	La Salina WWTP, Oceanside Ocean Outfall	434521	R9-2019-0166	Y
1101263	01/17/2022	Deficient Monitoring	Weekly CBOD sample was missed; sample was collected but the lab tech did not set	Violation	N	eSMR	San Luis Rey Water Reclamation Facility	434521	R9-2019-0166	N
1101262	01/17/2022	Deficient Monitoring	Weekly CBOD sample was missed; sample was collected but the lab tech did not set	Violation	N	eSMR	La Salina WWTP, Oceanside Ocean Outfall	434521	R9-2019-0166	N
1099934	11/16/2021	Surface Water	The 11/16/21 A-2 mid depth location exceeded the single sample maximum for fecal	Violation	N	eSMR	Oceanside Ocean Outfall	434521	R9-2019-0166	Y
1096115	07/19/2021	Surface Water	The 07/19/21 S-5 location exceeded the single sample limit for fecal coliforms.	Violation	N	eSMR	Oceanside Ocean Outfall	434521	R9-2019-0166	N
1096114	07/19/2021	Surface Water	The 07/19/21 S-3 exceeded the single sample limit for fecal coliforms.	Violation	N	eSMR	Oceanside Ocean Outfall	434521	R9-2019-0166	N
1092659	06/07/2021	Surface Water	6/7/21 A-1 mid depth location exceeded the single sample maximum limit for fecal	Violation	N	eSMR	Oceanside Ocean Outfall	434521	R9-2019-0166	Y
1090817	11/19/2020	Late Report	The investigative Order response was due no later than November 18, 2020. The re	Violation	N	Report	City of Oceanside Collection System, La Salina WWTP	439293	R9-2020-0203	Y
1090780	11/19/2020	Late Report	The investigative Order response was due no later than November 18, 2020. The re	Violation	N	Report	San Luis Rey Water Reclamation Facility	439309	R9-2020-0211	Y
1089572	03/29/2021	CAT1	Settleable Solids Instantaneous Maximum limit is 3 ml/L and reported value was 1	Violation	N	eSMR	La Salina WWTP, Oceanside Ocean Outfall	434521	R9-2019-0166	Y
1089571	03/19/2021	CAT1	Settleable Solids Instantaneous Maximum limit is 3 ml/L and reported value was 7	Violation	N	eSMR	La Salina WWTP, Oceanside Ocean Outfall	434521	R9-2019-0166	Y
1089570	03/24/2021	CAT1	Settleable Solids Instantaneous Maximum limit is 3 ml/L and reported value was 7	Violation	N	eSMR	La Salina WWTP, Oceanside Ocean Outfall	434521	R9-2019-0166	Y
1089567	03/20/2021	CAT1	Settleable Solids Instantaneous Maximum limit is 3 ml/L and reported value was 3	Violation	N	eSMR	La Salina WWTP, Oceanside Ocean Outfall	434521	R9-2019-0166	Y
1088259	02/16/2021	CAT1	Settleable Solids Instantaneous Maximum limit is 3 ml/L and reported value was 3	Violation	N	eSMR	La Salina WWTP, Oceanside Ocean Outfall	434521	R9-2019-0166	Y
1085310	12/30/2020	CAT1	Settleable Solids Instantaneous Maximum limit is 3 ml/L and reported value was 1	Violation	N	eSMR	La Salina WWTP, Oceanside Ocean Outfall	434521	R9-2019-0166	Y
1077160	04/10/2020	Sanitary Sewer Overflow/Spill/	On April 10, 2020, 820,000 gallons of untreated wastewater spilled to Windmill C	Violation	N	Report	San Luis Rey Water Reclamation Facility	434521	R9-2019-0166	Y
1075246	04/30/2020	Deficient Monitoring	S2 was only sampled four times for fecal coliforms and enterococci in the month	Violation	N	eSMR	Oceanside Ocean Outfall	434521	R9-2019-0166	N
1075245	04/30/2020	Deficient Monitoring	S1 was only sampled four times for fecal coliforms and enterococci in the month	Violation	N	eSMR	Oceanside Ocean Outfall	434521	R9-2019-0166	N
1075243	04/30/2020	Deficient Monitoring	S5 was only sampled four times for fecal coliforms and enterococci in the month	Violation	N	eSMR	Oceanside Ocean Outfall	434521	R9-2019-0166	N
1075242	04/30/2020	Deficient Monitoring	S4 was only sampled four times for fecal coliforms and enterococci in the month	Violation	N	eSMR	Oceanside Ocean Outfall	434521	R9-2019-0166	N
1075241	04/30/2020	Deficient Monitoring	S3 was only sampled four times for fecal coliforms and enterococci in the month	Violation	N	eSMR	Oceanside Ocean Outfall	434521	R9-2019-0166	N
1072538	04/10/2020	Sanitary Sewer Overflow/Spill/	Type: Category 1. Other (specify below);Massive rain event with water way flowin	Violation	N	SSO	City of Oceanside Collection System, La Salina WWTP	300562	2022-0103-DWQ	Y
1072537	04/10/2020	Sanitary Sewer Overflow/Spill/	Type: Category 1. Flow Exceeded Capacity (Separate CS Only);Super heavy rains ca	Violation	N	SSO	City of Oceanside Collection System, La Salina WWTP	300562	2022-0103-DWQ	Y
1064888	10/06/2019	Sanitary Sewer Overflow/Spill/	Type: Category 1. Grease Deposition (FOG);Grease blocking the City line caused 3	Violation	N	SSO	City of Oceanside Collection System, La Salina WWTP	300562	2022-0103-DWQ	Y
1063857	09/15/2019	Sanitary Sewer Overflow/Spill/	Type: Category 1. Root Intrusion caused 335.0 gallons of sewage to spill from Up	Violation	N	SSO	City of Oceanside Collection System, La Salina WWTP	300562	2022-0103-DWQ	Y
1058430	05/04/2019	Sanitary Sewer Overflow/Spill/	Construction Diversion Failure caused 750 gallons of sewage to spill from Gravit	Violation	N	SSO	City of Oceanside Collection System, La Salina WWTP	300562	2022-0103-DWQ	Y
1056726	11/16/2018	Deficient Monitoring	Failed to meet laboratory QC for cBOD sample analysis at monitoring locations M-	Violation	N	Report	Oceanside Ocean Outfall	377272	R9-2011-0016	Y
1055929	02/14/2019	Sanitary Sewer Overflow/Spill/	Other (specify below);Sewer LS hydraulically overloaded by extremely large rain	Violation	N	SSO	City of Oceanside Collection System, La Salina WWTP	300562	2022-0103-DWQ	Y
1053647	10/30/2018	Late Report	The No Spill Certification for September 2018 was submitted on 11/13/2018. This	Violation	N	Report	City of Oceanside Collection System, La Salina WWTP	300562	2022-0103-DWQ	Y
1049627	10/13/2018	Sanitary Sewer Overflow/Spill/	Pipe Structural Problem/Failure caused 48950 gallons of sewage to spill from For	Violation	N	SSO	City of Oceanside Collection System, La Salina WWTP	300562	2022-0103-DWQ	Y

ATTACHMENT B

California Home Tuesday, July 04, 2023

CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY
STATE WATER RESOURCES CONTROL BOARD

California Integrated Water Quality System Project (CIWQS)

Spill Public Report – Summary Page

Here is the summary page with the results of your spill public report search. These results correspond to the following search criteria:

SEARCH CRITERIA: [REFINE SEARCH]

- Agency (**Oceanside City**)
- Region (**9**)
- Spill Type (**sso_cat1_2_3**)

Please see the Glossary of Terms for explanations of the search results column headings. **More information about the report is found at the bottom of this page**.

Note: For the "Collection System Performance Report" column, the Performance report will only show the most recent 12 months of data if in the original SSO Interactive Report search the date range was not specified.

[VIEW PRINTER FRIENDLY VERSION] [EXPORT THIS REPORT TO EXCEL] [EXPORT ALL SPILL DETAILS TO EXCEL]

Region	Responsible Agency	Collection System	Total Number of SSO locations	Total Vol of SSOs(gal)	Total Vol Recover (gal)	Total Vol Reach Surface Water	Percent Recover	Percent Reach Surface Water	Miles Pressure Sewer	Miles Gravity Sewer	Miles of Laterals	Number of Pump Stations	WDID	Collection System Performance Report
9	Oceanside City	City of Oceanside Collection System, La Salina WWTP	100	7,795,858	728,908	6,987,199	9	89	37.7	456.1	0.0	31		Operational Performance
			100	**7,795,858**	**728,908**	**6,987,199**			**37.7**	**456.1**	**0.0**	**31.0**		

Each individual SSO report contains the data related to one specific location where sewage discharged from the sanitary sewer system due to a failure (e.g., sewer pipe blockage or pump failure). A single failure within a sanitary sewer system can result in multiple sewage discharge locations and, thus, multiple SSO reports. For example, a lift station power failure can result in sewage being discharged from numerous manholes. In this example, a SSO report would be submitted for each manhole that discharged sewage with all reports sharing the same failure or cause data.

It is important to review SSO reports in detail to determine if individual sewage discharge locations share a common underlying failure or cause when assessing the performance of Enrollees and their sanitary sewer systems through SSO events. This is because it is the failures that are the ultimate problem which the Enrollees should be making all reasonable efforts to prevent.

The search results below present summary data for all sewage discharge locations, as submitted through individual SSO reports, which meet the search criteria selected. To determine if SSO reports relate to a common failure within the sanitary sewer system, the SSO reports should be reviewed in detail by selecting the specific “agency” or “collection sys” name from the table below.

The “agency”, or Enrollee, listed on a SSO report is responsible for the sewage discharge described and should be contacted directly for questions related to that incident.

The current report was generated with real-time data entered by Enrollees.

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ATTACHMENT C

California Home Tuesday, July 04, 2023

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]

- Region (**9**)
- 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: **9**

[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
886859	9	Oceanside City	City of Oceanside Collection System, La Salina WWTP	Category 3	2023-03-02 07:50:00.0	325	150	0	Gravity Mainline	
884025	9	Oceanside City	City of Oceanside Collection System, La Salina WWTP	Category 3	2022-10-30 09:30:00.0	180	100	0	Manhole	
880521	9	Oceanside City	City of Oceanside Collection System, La Salina WWTP	Category 2	2022-04-05 09:10:00.0	2,750	2,750	0	Manhole	
880024	9	Oceanside City	City of Oceanside Collection System, La Salina WWTP	Category 1	2022-03-17 18:06:00.0	6,400	4,500	1,900	Manhole	
877653	9	Oceanside City	City of Oceanside Collection System, La Salina WWTP	Category 1	2021-11-20 09:00:00.0	14,420	0	14,420	Pump Station-Mechanical	
877444	9	Oceanside City	City of Oceanside Collection System, La Salina WWTP	Category 1	2021-11-07 09:40:00.0	448	0	448	Manhole	
875103	9	Oceanside City	City of Oceanside Collection System, La Salina WWTP	Category 2	2021-07-03 14:12:00.0	29,500	0	0	Force Main	
875102	9	Oceanside City	City of Oceanside Collection System, La Salina WWTP	Category 1	2021-07-03 13:50:00.0	504	0	504	Gravity Mainline	
873497	9	Oceanside City	City of Oceanside Collection System, La Salina WWTP	Category 1	2021-04-12 10:56:00.0	155	130	25	Gravity Mainline	
866073	9	Oceanside City	City of Oceanside Collection System, La Salina WWTP	Category 1	2020-04-10 11:10:00.0	38,250	0	38,250	Hydraulic overload	
866074	9	Oceanside City	City of Oceanside Collection System, La Salina WWTP	Category 1	2020-04-10 00:00:00.0	1,210,000	0	1,210,000	Pump Station-Power	
861818	9	Oceanside City	City of Oceanside Collection System, La Salina WWTP	Category 1	2019-10-06 10:45:00.0	300	200	100	Gravity Mainline	
861201	9	Oceanside City	City of Oceanside Collection System, La Salina WWTP	Category 1	2019-09-15 19:30:00.0	335	0	335	Gravity Mainline	
858118	9	Oceanside City	City of Oceanside Collection System, La Salina WWTP	Category 1	2019-05-04 09:30:00.0	750	0	750	Gravity Mainline	

856153	9	Oceanside City	City of Oceanside Collection System, La Salina WWTP	Category 1	2019-02-14 14:30:00.0	7,500	0	7,500	Manhole
854641	9	Oceanside City	City of Oceanside Collection System, La Salina WWTP	Category 3	2018-12-23 08:09:00.0	990	890	0	Gravity Mainline
851727	9	Oceanside City	City of Oceanside Collection System, La Salina WWTP	Category 1	2018-10-13 08:46:00.0	48,950	0	48,950	Force Main
850193	9	Oceanside City	City of Oceanside Collection System, La Salina WWTP	Category 3	2018-08-16 08:03:00.0	294	294	0	Manhole
848742	9	Oceanside City	City of Oceanside Collection System, La Salina WWTP	Category 3	2018-07-03 10:40:00.0	200	200	0	Gravity Mainline
846533	9	Oceanside City	City of Oceanside Collection System, La Salina WWTP	Category 1	2018-04-17 16:30:00.0	120	0	120	Gravity Mainline
846373	9	Oceanside City	City of Oceanside Collection System, La Salina WWTP	Category 3	2018-04-12 06:00:00.0	100	100	0	Gravity Mainline
841563	9	Oceanside City	City of Oceanside Collection System, La Salina WWTP	Category 1	2017-11-15 09:51:00.0	195	0	195	Manhole
840875	9	Oceanside City	City of Oceanside Collection System, La Salina WWTP	Category 1	2017-10-17 07:50:00.0	250	100	250	Gravity Mainline
840706	9	Oceanside City	City of Oceanside Collection System, La Salina WWTP	Category 2	2017-10-10 06:33:00.0	4,050	3,000	0	Gravity Mainline
839789	9	Oceanside City	City of Oceanside Collection System, La Salina WWTP	Category 3	2017-09-08 22:10:00.0	500	0	0	Gravity Mainline
837136	9	Oceanside City	City of Oceanside Collection System, La Salina WWTP	Category 2	2017-07-14 14:20:00.0	21,225	0	0	Gravity Mainline
834364	9	Oceanside City	City of Oceanside Collection System, La Salina WWTP	Category 3	2017-04-07 12:30:00.0	150	150	0	Manhole
831798	9	Oceanside City	City of Oceanside Collection System, La Salina WWTP	Category 3	2017-01-16 10:30:00.0	100	0	0	Gravity Mainline
829908	9	Oceanside City	City of Oceanside Collection System, La Salina WWTP	Category 3	2016-11-20 10:35:00.0	600	0	0	Gravity Mainline
820787	9	Oceanside City	City of Oceanside Collection System, La Salina WWTP	Category 2	2016-01-06 14:46:00.0	3,600	0	0	Gravity Mainline
820182	9	Oceanside City	City of Oceanside Collection System, La Salina WWTP	Category 3	2015-12-15 05:15:00.0	850	800	0	Gravity Mainline
819483	9	Oceanside City	City of Oceanside Collection System, La Salina WWTP	Category 1	2015-11-16 05:20:00.0	5,750	5,000	750	Pump Station-Power
816329	9	Oceanside City	City of Oceanside Collection System, La Salina WWTP	Category 1	2015-07-03 07:20:00.0	200	0	200	Gravity Mainline
815894	9	Oceanside City	City of Oceanside Collection System, La Salina WWTP	Category 1	2015-06-15 09:00:00.0	540,000	432,500	107,500	Hydraulic issue in 24" gravity that flows through a tunnel
813385	9	Oceanside City	City of Oceanside Collection System, La Salina WWTP	Category 2	2015-02-27 17:06:00.0	1,410	1,200	0	Gravity Mainline
812371	9	Oceanside City	City of Oceanside Collection System, La Salina WWTP	Category 3	2015-01-20 11:40:00.0	245	245	0	Gravity Mainline
809651	9	Oceanside City	City of Oceanside Collection System, La Salina WWTP	Category 3	2014-09-30 07:40:00.0	625	350	0	Gravity Mainline
807940	9	Oceanside City	City of Oceanside Collection System, La Salina WWTP	Category 3	2014-07-27 09:15:00.0	165	165	0	Gravity Mainline
807914	9	Oceanside City	City of Oceanside Collection System, La Salina WWTP	Category 3	2014-07-25 11:16:00.0	500	500	0	Gravity Mainline
805744	9	Oceanside City	City of Oceanside Collection System, La Salina WWTP	Category 1	2014-04-26 12:50:00.0	375	0	375	Gravity Mainline

803906	9	Oceanside City	City of Oceanside Collection System, La Salina WWTP	Category 1	2014-02-17 11:30:00.0	5,800	2,600	3,200	Gravity Mainline
802040	9	Oceanside City	City of Oceanside Collection System, La Salina WWTP	Category 1	2013-12-21 10:30:00.0	150	60	150	Gravity Mainline
801580	9	Oceanside City	City of Oceanside Collection System, La Salina WWTP	Category 1	2013-12-11 07:55:00.0	625	0	625	Gravity Mainline
801096	9	Oceanside City	City of Oceanside Collection System, La Salina WWTP	Category 1	2013-11-25 08:42:00.0	11,400	0	8,400	Force Main
798608	9	Oceanside City	City of Oceanside Collection System, La Salina WWTP	Category 3	2013-08-22 09:49:00.0	300	0	0	Gravity Mainline
792688	9	Oceanside City	City of Oceanside Collection System, La Salina WWTP	Category 1	2013-03-16 19:30:00.0	1,000	500	500	Main
792119	9	Oceanside City	City of Oceanside Collection System, La Salina WWTP	Category 1	2013-02-25 18:45:00.0	4,500	200	4,300	Main
791749	9	Oceanside City	City of Oceanside Collection System, La Salina WWTP	Category 1	2013-02-16 14:10:00.0	13,050	12,000	1,050	Station failure caused spill in neighborhood.
788880	9	Oceanside City	City of Oceanside Collection System, La Salina WWTP	Category 1	2012-12-07 15:30:00.0	1,500	1,300	200	Main
788031	9	Oceanside City	City of Oceanside Collection System, La Salina WWTP	Category 1	2012-11-13 11:00:00.0	885	0	885	Main

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