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***Via Certified Mail –
Return Receipt Requested***

January 8, 2024

Kevin Woodhouse, City Manager
Members of the City Council
Pacifica Community Center
540 Crespi Dr.
Pacifica, CA 94044

Louis Sun, Plant Manager
Head of Agency
Calera Creek Water Recycling Plant
700 Pacific Coast Highway
Pacifica, CA 94044

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

Dear Mr. Woodhouse, Mr. Sun, Head of Agency, and City Council Members:

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 Calera Creek Water Recycling Plant ("Facility") and associated sewer collection system.

River Watch hereby places the City of Pacifica ("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 pursuant to CWA § 301(a), 33 U.S.C. § 1311(a), and the San Francisco Bay Regional Water Quality Control Board ("RWQCB-SF"), 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 the City, 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 (“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 order which is the subject of this Notice is NPDES No. CA0038776 (“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. River Watch contends these violations are continuing or have a likelihood of occurring in the future.

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

The City, in exceeding the Receiving Water Limitations specified in NPDES Permit Section 5, caused prohibited pollution by unreasonably affecting the beneficial uses of these waters. 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.

B. Sanitary Sewer Overflows, Inadequate Reporting of Discharges, 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 Calera Creek, a water of the United States, to include preservation of rare and endangered species, warm freshwater habitat, wildlife habitat, water contact recreation and non-contact water recreation.

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 Calera Creek. 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 A) identifies **157 SSOs**, resulting in **4,160,876** gallons of raw sewage discharged into the environment. Of the total volume, the City acknowledges at least **4,135,118** gallons, or **99%** of the total, reached a surface water. A review of the City’s records indicates an even greater percentage of SSOs reached a drainage to a surface water or a surface water itself. Of the 4,160,876 gallons of sewage spilled, the City reported only 24,067 gallons recovered, allowing the remaining sewage to be 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 Spill Public Report – Spill Event ID(s) Page (Attachment B) specifically identifies at least 99.8% of recent SSOs reported as having reached a water of the United States. Of significant concern is the spill volume in a number of the most recent reported events:

- December 31, 2022 (Event ID# 885098) – an SSO estimated at 49,500 gallons occurred at Linda Mar Lift Station (Coordinates 37.6107 -122.49223). The cause of the spill was reported as 'Flow Exceeded Capacity.' All 49,500 gallons were reported as reaching the Pacific Ocean via Linda Mar State Beach.
- October 24-25, 2021 (Event ID# 877061) – an SSO estimated at 2,938,986 gallons occurred at Linda Mar Lift Station (Coordinates 37.59576 – 122.50314). The cause of the spill was reported as 'Flow Exceeded Capacity.' All 2,938,986 gallons were reported as reaching the Pacific Ocean via Pacifica State Beach.
- October 24, 2021 (Event ID# 877111) – an SSO estimated at 44,050 gallons occurred at 1180 Peralta Road (Coordinates 37.59239 -122.49685). The cause of the spill was reported as 'Flow Exceeded Capacity.' All 44,050 gallons were reported as reaching the Pacific Ocean via Linda Mar Beach.

2. Inadequate Reporting of Discharges

Full and complete reporting of SSOs is essential to gauging their impact on public health and the environment.¹ 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 # 885098) – The spill cause is reported as "Flow Exceeded Capacity." The estimated spill start time, agency notification time and operator arrival are all reported as 8:15 a.m. The estimated spill end time is less than four hours later at 12:00 p.m.
- October 24-25, 2021 (Event ID# 877061) – The estimated spill start time and agency notification time are both reported as 10:00 p.m. on October 24th. The operator arrival time is reported as 6:30 a.m. on October 24th, eight and a half hours before the spill start time and agency arrival. The spill end time is reported as 8:35 p.m., on the next day, October 25th.

¹ The City appears to have failed to continue posting SSOs to the CIWQS online database as of December 31, 2022.

Given the unlikely accuracy of the times and intervals provided in these reports, it is difficult to consider the stated volumes as accurate. With inaccuracies in reporting the notification time, operator arrival, and the spill end time, there is a risk that the duration and volume of a spill will be underestimated.

3. Failure to Mitigate Impacts

NPDES Permit, Attachment D. Standard Provisions, Section 1, Standard Provisions - Permit Compliance, Sub-section 1.3, 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.

Note that River Watch, in addition to the requirements of the Statewide WDR, contends that a critical remedial measure of compliance with the CWA is the performance of adequate sampling to determine the nature and impacts of SSOs on the environment. Underestimating SSOs which reach surface waters, as identified above in this Notice, must be addressed by the City.

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 sewer collection system result in discharges to adjacent surface waters via underground hydrological connections. River Watch is concerned by the absence in the public record of reports by the City confirming that no 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, Calera Creek and its tributaries. Chronic failures in a 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 Pacifica and those of its employees responsible for compliance with the CWA and with any applicable state and federal regulations and permits.

The Facility provides advanced secondary treatment of domestic and commercial wastewater to a population of approximately 40,000. The Facility's treatment process is comprised of screening, grit removal, sequencing batch reactors, sand filtration, and ultraviolet disinfection. Effluent is then either diverted to a cascade aerator or routed to the North Coast County Water District. After diversion to the cascade aerator, the effluent is discharged into Calera Creek and from there to the Pacific Ocean.

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 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 January 8, 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, 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 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 educating the public concerning environmental issues associated with these environs.

River Watch may be contacted via email at US@criverwatch.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
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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, maintenance holes 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.

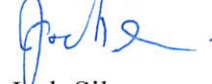
CONCLUSION

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 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 \$66,712.00 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
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San Francisco, CA 94105

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

Michelle M. Kenyon
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1999 Harrison St / Suite 1650
Oakland, CA 94612-3520

ATTACHMENT A

California Home

Tuesday, November 28, 2023



California Integrated Water Quality System Project (CIWQS)

Spill Public Report – Summary Page

The information on this summary page is the result of your search. These results correspond to the following search criteria:

- SEARCH CRITERIA:** [\[REFINE SEARCH\]](#)
- Collection System (Calera Crk Wtr Recycling Plant CS)
 - Region (2)
 - Spill Type (Category 1; Category 2; Category 3)

The information in this table does not include Category 4 spills, as defined in the Statewide Sanitary Sewer Systems General Order 2022-0103-DWQ (https://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2022/wqo_2022-0103-dwq.pdf).

More information about the Spill Public Report is found at the bottom of this page.

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Region	Responsible Agency	Sanitary Sewer System	WDID	Total Number of Spills	Total Volume of Spills (gal)	Total Volume Recovered (gal)	Total Volume Reached Surface Water (gal)	Percent Recovered (%)	Percent Reached Surface Water (%)	Miles of Pressure Sewer	Miles of Gravity Sewer	Miles of Laterals	Number of Pump Stations
2	City of Pacifica	Calera Crk Wtr Recycling Plant CS	2SSO10100	157	4,160,876	24,067	4,135,118	0	99	4.2	96.0	0.0	5
				157	4,160,876	24,067	4,135,118			4.2	96.0	0.0	5.0

When assessing the performance of sanitary sewer systems regulated under the Statewide Sanitary Sewer Systems General Order, it is important to review spill reports in detail. There may be multiple individual spill event IDs that share the same location.

The search results on this summary page present summary data from individual spill reports submitted in the online CIWQS Sanitary Sewer System Database, meeting the search criteria selected. To determine if spill reports relate to a common failure point within the sanitary sewer system, the spill reports should be reviewed in detail by selecting a number under the "Total Number of Spills" column, corresponding to a specific sanitary sewer system.

The "Responsible Agency", or Enrollee, listed on a spill report is responsible for the spill 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 B

California Home

Tuesday, November 28, 2023



CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY STATE WATER RESOURCES CONTROL BOARD

California Integrated Water Quality System Project (CIWQS)

Spill Public Report – Spill Event ID(s) Page

Here is the detail page of your Sanitary Sewer System Spill Report search for selected Regional Board, county, responsible agency, or sanitary sewer system. These results correspond to the following search criteria:

SEARCH CRITERIA: [\[REFINE SEARCH\]](#)

- Collection System (Calera Crk Wtr Recycling Plant CS)
- Region (2)
- Spill Type (Category 1; Category 2; Category 3)
- Agency (City of Pacifica)

The table below presents important details from Enrollee-submitted certified spill events, as submitted through individual spill reports, which meet the search criteria selected on the Sanitary Sewer System (SSS) Spill Report Form. 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 spill report, select the corresponding "Spill Event ID".

DRILLDOWN HISTORY: [\[GO BACK TO SUMMARY PAGE\]](#)

REGION: 2

[\[NEW PRINTER FRIENDLY VERSION\]](#)[\[EXPORT THIS REPORT TO EXCEL\]](#)

Event ID	Region	Responsible Agency	Sewer System	WDID	Spill Category	Spill Start Date	Spill Vol (gal)	Spill Vol Recovered (gal)	Spill Vol Reached Surface Water (gal)	System Failure Location	Spill Appearance Point
885296	2	City of Pacifica	Calera Crk Wtr Recycling Plant CS	2SSO10100	Category 1	2022-12-31 14:32	37,710	0	37,710	Manhole	Manhole
885098	2	City of Pacifica	Calera Crk Wtr Recycling Plant CS	2SSO10100	Category 1	2022-12-31 11:40	49,500	0	49,500	Pump Station-Mechanical	Combined Sewer D.I. (Combined CS Only); Pump station
885097	2	City of Pacifica	Calera Crk Wtr Recycling Plant CS	2SSO10100	Category 1	2022-12-31 08:15	16,100	0	16,100	Manhole	Manhole
879791	2	City of Pacifica	Calera Crk Wtr Recycling Plant CS	2SSO10100	Category 3	2022-02-06 10:55	370	370	0	Gravity Mainline	Manhole
879247	2	City of Pacifica	Calera Crk Wtr Recycling Plant CS	2SSO10100	Category 3	2022-01-23 12:25	100	100	0	Gravity Mainline	Gravity Mainline; Manhole
877111	2	City of Pacifica	Calera Crk Wtr Recycling Plant CS	2SSO10100	Category 1	2021-10-24 19:10	44,050	0	44,050	Gravity Mainline	Gravity Mainline; Manhole
877061	2	City of Pacifica	Calera Crk Wtr Recycling Plant CS	2SSO10100	Category 1	2021-10-24 22:00	2,938,986	0	2,938,986	Manhole	Manhole; Pump station
873986	2	City of Pacifica	Calera Crk Wtr Recycling Plant CS	2SSO10100	Category 3	2021-05-06 10:31	220	0	0	Gravity Mainline	Lateral Clean Out (Private)
870438	2	City of Pacifica	Calera Crk Wtr Recycling Plant CS	2SSO10100	Category 2	2020-11-16 15:05	1,375	1,375	0	Gravity Mainline	Manhole

870342	2	City of Pacifica	Calera Crk Wtr Recycling Plant CS	2SSO10100	Category 3	2020-11-10 09:25	50	50	0	Pipe Barrel	Other sewer system structure
866161	2	City of Pacifica	Calera Crk Wtr Recycling Plant CS	2SSO10100	Category 3	2020-04-15 03:30	175	175	0	Gravity Mainline	Gravity Mainline;Manhole
848607	2	City of Pacifica	Calera Crk Wtr Recycling Plant CS	2SSO10100	Category 3	2018-06-26 09:00	10	10	0	Manhole	Manhole
847758	2	City of Pacifica	Calera Crk Wtr Recycling Plant CS	2SSO10100	Category 2	2018-06-03 09:10	1,750	1,750	0	Gravity Mainline	Manhole
846274	2	City of Pacifica	Calera Crk Wtr Recycling Plant CS	2SSO10100	Category 1	2018-04-07 05:17	10,400	0	10,400	Capacity related	Manhole;Pump station
843609	2	City of Pacifica	Calera Crk Wtr Recycling Plant CS	2SSO10100	Category 1	2018-01-08 22:02	37,750	0	37,750	Over capacity	Manhole;Pump station
835802	2	City of Pacifica	Calera Crk Wtr Recycling Plant CS	2SSO10100	Category 3	2017-06-10 10:00	550	550	0	Gravity Mainline	Manhole
832908	2	City of Pacifica	Calera Crk Wtr Recycling Plant CS	2SSO10100	Category 1	2017-02-20 17:15	47,000	0	47,000	Over capacity	Manhole;Pump station
832529	2	City of Pacifica	Calera Crk Wtr Recycling Plant CS	2SSO10100	Category 1	2017-02-07 08:52	20,225	0	20,225	Capacity related/Linda Mar Lift Station	Pump station
831609	2	City of Pacifica	Calera Crk Wtr Recycling Plant CS	2SSO10100	Category 1	2017-01-10 16:10	50,600	0	50,600	Pump Station-Mechanical	Pump station
831497	2	City of Pacifica	Calera Crk Wtr Recycling Plant CS	2SSO10100	Category 1	2017-01-08 15:47	78,910	0	78,910	Pump Station-Mechanical	Manhole;Pump station
831486	2	City of Pacifica	Calera Crk Wtr Recycling Plant CS	2SSO10100	Category 1	2017-01-08 07:45	75,790	0	75,790	Gravity Mainline	Manhole
830764	2	City of Pacifica	Calera Crk Wtr Recycling Plant CS	2SSO10100	Category 1	2016-12-15 16:20	84,510	0	84,510	Manhole	Manhole
822870	2	City of Pacifica	Calera Crk Wtr Recycling Plant CS	2SSO10100	Category 1	2016-03-13 15:40	3,460	0	3,460	Manhole	Manhole
822645	2	City of Pacifica	Calera Crk Wtr Recycling Plant CS	2SSO10100	Category 1	2016-03-05 21:30	70,140	0	70,140	Lift station could not keep up with heavy I&I flows	Manhole
821087	2	City of Pacifica	Calera Crk Wtr Recycling Plant CS	2SSO10100	Category 1	2016-01-19 09:52	29,400	0	29,400	Gravity Mainline	Manhole

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