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May 7, 2018

**VIA CERTIFIED U. S. MAIL**  
**RETURN RECEIPT REQUESTED**

Beverli A. Marshall, General Manager  
Sewer Authority Mid-Coastside  
1000 Cabrillo Hwy N.  
Half Moon Bay, CA 94019

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

Dear Beverli Marshall:

This firm represents the Ecological Rights Foundation (“ERF”) in regard to violations of the Federal Water Pollution Control Act, 33 U.S.C. §§ 1251 *et seq.* (“Clean Water Act” or “CWA”) caused by the Sewer Authority Mid-Coastside’s (“SAM”) failure to comply with the terms and conditions of the *Waste Discharge Requirements for Sewer Authority Mid-Coastside Wastewater Treatment Plant and Intertie Pipeline System*, Order Nos. R2-2012-0061, as amended by Order No. R2-2017-0040, NPDES No. CA0038598 (“2017 NPDES Permit”), the *Statewide General Waste Discharge Requirements for Sanitary Sewer Systems*, Order No. 2006-0003-DWQ (“General Permit”), and the *Monitoring and Reporting Requirement*, Order WQ 2013-0058-EXEC (“Monitoring and Reporting Requirements”).<sup>1</sup>

As required by the Clean Water Act, ERF puts SAM on formal notice that, after the expiration of sixty (60) days from the date of this Notice of Violation and Intent To File Suit Letter (“Notice Letter”), ERF intends to file suit in Federal District Court pursuant to Section 505(a) of the Clean Water Act, 33 U.S.C. §1365(a), against SAM for the violations described in this Notice Letter.

Section 505(b) of the Clean Water Act, 33 U.S.C. § 1365(b), requires that sixty (60) days prior to the initiation of a civil action under Section 505(a) of the Clean Water Act, 33 U.S.C. § 1365(a), a citizen must give notice of his/her intention to file suit. Notice must be given to the owner or managing agent of the facility responsible for the violations, the Administrator of the United States Environmental Protection Agency (“EPA”), the Regional Administrator of the EPA, and the Executive Officer of the State of California’s State Water Resources Control Board (“State Board”). *See* 40 C.F.R. § 135.2.

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<sup>1</sup> The General Permit and Monitoring and Reporting Requirements are incorporated into the 2017 NPDES Permit at § VI.C.4.b.

ERF intends to file suit to seek injunctive relief pursuant to CWA Sections 505(a) and (d), 33 U.S.C. §1365(a) and (d), declaratory relief, and such other relief permitted by law to remedy the CWA violations outlined below. ERF will also seek civil penalties pursuant to Section 309(d) of the Clean Water Act, 33 U.S.C. § 1319(d), and the EPA Regulation, Adjustment of Civil Monetary Penalties for Inflation, set forth at 40 C.F.R. § 19.4 (2009).

These provisions authorize civil penalties for each separate violation of the Clean Water Act of up to \$37,500 per day per violation for all Clean Water Act violations occurring after January 12, 2009, and up to \$51,570 per day per violation for all violations occurring after November 2, 2015. Finally, ERF will seek to recover its litigation costs, including attorneys' and experts' fees, pursuant to CWA Section 505(d), 33 U.S.C. § 1365(d).

## **I. ORGANIZATION GIVING NOTICE OF CLEAN WATER ACT VIOLATIONS**

ERF is a non-profit public benefit corporation dedicated to the preservation, protection and defense of the environment, wildlife and natural resources of California waters, including Half Moon Bay and the Pacific Ocean at Venice Beach, Pillar Point Beach, and Fitzgerald Marine Reserve. ERF's offices are located 867 B Redwood Drive, Garberville, California 95542.

ERF's members use and enjoy Half Moon Bay and the Pacific Ocean (including but not limited to Venice Beach, Pillar Point Beach, and Fitzgerald Marine Reserve) for fishing, boating, swimming, picnicking, viewing wildlife, and engaging in scientific study. Information available to ERF indicates that SAM discharges raw and/or inadequately treated sewage into Half Moon Bay and the Pacific Ocean, both waters of the United States. These discharges of sewage and associated pollutants degrade water quality and harm aquatic life in these waters, and thus impair ERF's members' use and enjoyment of these waters. Further, SAM's discharges of raw and/or inadequately treated sewage are ongoing and continuous. As a result, ERF's members' use and enjoyment of these waters has been and continues to be adversely impacted by the discharges of sewage to waters used and enjoyed by ERF's members.

## **II. THE ENTITY RESPONSIBLE FOR THE ILLEGAL DISCHARGES**

Information available to ERF indicates that SAM owns and operates the Sewer Authority Mid-Coastside Wastewater Treatment Plant and its wastewater collection system. SAM provides wastewater collection, treatment, and disposal services to residents and businesses in the City of Half Moon Bay, El Granada, Montara, Miramar, Moss Beach and Princeton by the Sea. SAM is responsible for the day-to-day operation and maintenance of the wastewater treatment plant that provides secondary treatment of domestic wastewater to a population of approximately 27,000 through three satellite collection systems: the City of Half Moon Bay, the Granada Community Services District, and the Montara Water and Sanitary District ("Intertie Pipeline System"). SAM's wastewater treatment plant ("Facility") is located at 1000 North Cabrillo Highway in Half Moon Bay.

### **III. THE INTERTIE PIPELINE SYSTEM, THE WASTEWATER TREATMENT PLANT, AND SAM'S NPDES PERMIT**

SAM is a public entity formed by a Joint Powers Authority agreement on or about February 3, 1976 under the laws of the State of California to consolidate wastewater treatment functions for approximately 27,000 coastal residents in San Mateo County. The three member agencies, which comprise SAM, are the City of Half Moon Bay, Granada Community Services District, and Montara Water and Sanitary District. Each member agency owns, operates, and maintains a sanitary sewer collection system. These sewer systems connect to the pump stations, force mains, and interceptor pipelines owned by SAM.

SAM operates the Intertie Pipeline System, a network of approximately 1.8 miles of gravity sewer pipe, 5.7 miles of force main pipeline, and three pump stations which delivers raw sewage to SAM's Wastewater Treatment Plant. SAM's sewer pipes are about 33 years old with eighty percent of the Intertie Pipeline System constructed around 1979. SAM provides sewage collection and treatment services for over 27,000 residential and commercial accounts in the City of Half Moon Bay, El Granada, Montara, Miramar, Moss Beach and Princeton by the Sea. The Intertie Pipeline System and the Facility are point sources under the Clean Water Act. *See* 33 U.S.C. § 1362(14).

The Facility's treatment process consists of influent screening, grit removal, primary clarification, activate sludge, secondary clarification, chlorination, and dechlorination. Sludge is treated by anaerobic digestion and belt filter press dewatering and is disposed of at Ox Mountain Sanitary Landfill. Effluent from the Facility is ultimately discharged to Half Moon Bay and the Pacific Ocean through a discharge pipe and a submerged, multi-port diffuser approximately 1,900 feet offshore of Pilarcitos Creek. The discharge pipe lies on ballast rock on the sea floor approximately 37 feet below mean lower low water and is covered with sand much of the year.

In 2012, SAM renewed its permit pursuant to the Clean Water Act (the 2012 NPDES Permit), which authorized it to discharge pollutants to the Pacific Ocean subject to certain terms and conditions. In 2017, SAM again renewed its permit pursuant to the Clean Water Act (the 2017 NPDES Permit). Both NPDES Permits contain strict prohibitions regarding discharges from SAM's sewage infrastructure, which includes the Intertie Pipeline System. 2017 NPDES Permit, § III.E; 2012 NPDES Permit, § III.E. The NPDES Permits also prohibit the bypass or overflow of waste to surface waters. 2017 NPDES Permit, § III.D; 2012 NPDES Permit, § III.D.

SAM operates and manages its Intertie Pipeline System improperly, resulting in sanitary sewer overflows ("SSOs") of raw and/or inadequately treated sewage. According to reports submitted by SAM to the State Board and the Regional Water Quality Control Board for the San Francisco Bay Region ("Regional Board"), SAM has spilled raw and/or inadequately treated sewage from its Intertie Pipeline System on at least 65 separate occasions in the last 5 years.

Attached hereto as Exhibit A is a table that lists the date and location of the 65 reported

SSOs.<sup>2</sup> In total, SAM spilled at least 557,103 gallons of sewage, and reported that 479,656 gallons of that sewage reached surface waters. SAM's ongoing and continuous SSOs are violations of the CWA and demonstrate serious problems with SAM's operation and maintenance of its Intertie Pipeline System.

#### **IV. THE LOCAL WATERWAYS RECEIVING THE ILLEGAL DISCHARGES OF POLLUTANTS AND THE ENVIRONMENTAL IMPACTS FROM THOSE DISCHARGES**

##### **A. The Receiving Waters**

SSOs from SAM's Intertie Pipeline System reach Half Moon Bay and the Pacific Ocean (collectively "the Receiving Waters"). The State Water Resources Control Board adopted the California Ocean Plan on July 6, 1972 with the latest revisions adopted in 2009. The Ocean Plan prohibits the discharge of waste to designated Areas of Special Biological Significance (ASBS). ASBS are designated by the State Water Board as ocean areas requiring protection of species or biological communities to the extent that alteration of natural water quality is undesirable.

The James V. Fitzgerald Area of Special Biological Significance (ASBS) is located approximately 7 miles north of the City of Half Moon Bay and extends from 4th Street, Montara south to the Pillar Point breakwater. The Fitzgerald Marine Reserve is located within the boundary of the ASBS. The Fitzgerald Marine Reserve is recognized as one of the richest, most biodiverse intertidal environments on the California coast and is a popular recreational area. A 5.5-mile band of shoreline including the Reserve was designated as an ASBS due to the diversity of habitat and biological assemblages, dense stands of bull kelp found along with red algae, a diverse array of invertebrates that inhabit the broad reef, and the 3 types of subtidal habitat that occur at this location. The watershed draining into the ASBS is a 4.5 square mile area of unincorporated communities consisting of Montara, Moss Beach, rural areas of Montara and Moss Beach along and north of San Vicente Creek, Seal Cove, and Pillar Point Bluff. Three main creeks drain to the Reserve – Montara, Dean, and San Vicente Creek.

Half Moon Bay provides habitat to many species of aquatic wildlife, including the federally threatened western snowy plover. Half Moon Bay and its tributaries provide habitat for aquatic species, as well as opportunities for wildlife viewing, fishing, and other water-related recreation such as swimming, wading and boating. Other sensitive, threatened and endangered species, including, but not limited to, the California red-legged frog, Coho salmon, San Francisco Garter Snake, Steelhead trout, Tidewater goby, and the western pond turtle, are known to occur in the watershed that flows into Half Moon Bay.

According to the State of California, the beneficial uses of the water bodies in the Pacific

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<sup>2</sup> Attached hereto as Exhibit A is a list of the SSOs SAM reported in the last 5 years in SSO reports submitted to the State and Regional Board, in the District's internal SSO reports, and in other correspondence to and from SAM indicating SSOs, from its Intertie Pipeline System.

Ocean and Half Moon Bay watershed include agricultural water supply, municipal and domestic supply, cold freshwater habitat, migration of aquatic organisms, rare, threatened, or endangered species, spawning, reproduction, and/or early development, warm freshwater habitat, water contact recreation, and non-contact water recreation.<sup>3</sup> The Pacific Ocean at Venice Beach (south of Frenchman's Creek), and at Pillar Point Beach, is listed on the State of California's 2014 and 2016 integrated report Clean Water Act Section 303(d) list of impaired water bodies as impaired for Indicator Bacteria.<sup>4</sup> The Pacific Ocean at Pillar Point is also listed as impaired for mercury.

Many of the pollutants found in raw and inadequately treated sewage are toxic. By discharging raw and/or inadequately treated sewage and its associated pollutants to waters of the United States in violation of the Clean Water Act, SAM has contributed, and continues to contribute to the impairment of the Pacific Ocean at Venice Beach and at Pillar Point Beach. SAM's violations of the Clean Water Act directly harm ERF's members' use and enjoyment of the Receiving Waters.

#### **B. Pollutants in Sewage and Their Impacts to the Environment and Human Health**

Raw and/or inadequately treated sewage harms the Receiving Waters and poses a serious risk to fisheries, wildlife habitat, and human health. Sewage contains human waste, viruses, protozoa, mold spores and bacteria. In addition, raw and/or inadequately treated sewage contains chemicals that cause cancer or reproductive toxicity. These chemicals come from solvents, detergents, cleansers, inks, pesticides, paints, pharmaceuticals, and other chemicals used by households and businesses and discarded to sewage collection systems. High concentrations of these pollutants are typically found in raw and/or inadequately treated sewage. SSOs from the SAM's Collection System result in the addition of these pollutants to the Receiving Waters.

SSOs and discharges of inadequately treated effluent also affect people who eat fish caught in the Receiving Waters. Toxic chemicals bio-accumulate in the Receiving Waters' food web, as contaminants absorbed by plankton accumulate in fish and birds farther up the food chain, and ultimately transfer to human consumers. Contamination of fish is particularly harmful to people who eat an above-average amount of local fish.

SSOs that do not reach the Receiving Waters, but instead discharge to public streets, public buildings and grounds, private yards or homes, also pose significant health risks. For example, exposure to raw and/or inadequately treated sewage can cause a variety of health problems, including gastroenteritis, respiratory illness, ear, nose, and throat problems, and skin rashes. Mold spores can establish an ecological niche when they are carried onto a homeowner's property after contact with an SSO, creating an ongoing health risk from chronic exposure. SSOs also diminish property values and impose severe nuisance on local residents.

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<sup>3</sup> See Table 2-1, Water Quality Control Plan, San Francisco Bay Region.

<sup>4</sup> See [https://www.waterboards.ca.gov/water\\_issues/programs/tmdl/integrated2014\\_2016.shtml](https://www.waterboards.ca.gov/water_issues/programs/tmdl/integrated2014_2016.shtml). A water body that is listed as impaired cannot support its designated beneficial uses.

**V. SAM'S DISCHARGES OF SSOs FROM THE INTERTIE PIPELINE SYSTEM VIOLATE ITS NPDES PERMITS**

The Clean Water Act requires that all regulated dischargers comply with the terms and conditions of their NPDES permit. *See* 33 U.S.C. §§ 1311(a), 1365. Any violation of the 2012 NPDES or the 2017 NPDES Permit is an enforceable violation of the Clean Water Act. 33 U.S.C. § 1365(f). SAM's NPDES Permits prohibit the discharge of wastewater, including SSOs, from the Intertie Pipeline System. *See* 2017 and 2012 NPDES Permits § III.A ("Discharge of treated wastewater at locations or in a manner different from that described in this Order is prohibited"), § III.D ("The bypass of untreated or partially-treated wastewater to waters of the United States is prohibited, except as provided for in the conditions stated in Attachment D, section I.G, of this Order."), and § III.E and General Permit § C.1 ("Any sanitary sewer overflow that results in a discharge of untreated or partially-treated wastewater to waters of the United States is prohibited. SAM has violated and continues to violate these provisions by discharging SSOs from the Intertie Pipeline System. At a minimum, SAM violated the 2017 NPDES Permit and the 2012 NPDES Permit on the dates set forth in Exhibit A (identifying 65 separate SSO events).

ERF believes that additional information will be discovered that indicates that SAM has not reported each and every SSO from the Intertie Pipeline System or has misreported SSOs occurring within the last five (5) years. Moreover, ERF believes that the SAM lacks an adequate monitoring program to detect, report, and address SSOs and their impacts. Thus, ERF believes that SSOs in addition to those identified in Exhibit A will be discovered through this enforcement action. ERF puts SAM on notice that all SSOs from the Intertie Pipeline System occurring in the last five (5) years, whether specifically reported or not, as well as any future violations, will be included in this litigation.

In response to SSOs in 2017, on July 25 and 28, and August 17, 2017, the RWQCB inspected SAM's Intertie Pipeline System and identified violations of the General Permit and the Monitoring and Reporting Requirements.<sup>5</sup> The report identifies the following violations:

- I. Sanitary Sewer Overflows
  - a. From May 2, 2007, through October 1, 2017, SAM certified 20 SSOs: 11 were Category 1 SSOs, 2 were Category 2 SSOs, and 7 were Category 3 SSOs. The combined volume of the SSOs was approximately 524,700 gallons, of which 513,000 gallons reached surface waters. These SSOs violated the General Permit.
- II. Sanitary Sewer Overflow Two-Hour Notification

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<sup>5</sup> December 8, 2017 letter "Violation of Collection System Requirements and Report of Inspection, Sewer Authority Mid-Coastside, Statewide, Statewide General Waste Discharge Requirements for Sanitary Sewer Systems, Order No. 2006-0003-DWQ, and Monitoring and Reporting Program Orders 2006-0003-DWQ, WQ 2008-0002-EXEC and WQ 2013-0058-EXEC" from Mary Boyd to Beverli Marshall.

- a. From May 2, 2007, through October 1, 2017, SAM failed to timely notify Office of Emergency Services (“OES”) of five Category 1 SSOs (event IDs 711896, 746478, 759671, 776285 and 776402). These SSOs occurred on January 25, 2008, November 1, 2009, December 19, 2010, January 21, 2012, and January 25, 2012, and each resulted in a discharge of sewage to surface water. SAM’s five failures to timely notify OES violated the 2008 Monitoring and Reporting Program (“MRP”) notification requirement.

III. Sanitary Sewer Overflow Water Quality Sampling

- a. From May 2, 2007, through October 1, 2017, SAM failed to collect water quality samples for seven SSOs for SSO Event IDs 711896, 730499, 746478, 758457, 759671, 773484 and 803569. These SSOs occurred on January 25, 2008, December 6, 2008, November 1, 2009, November 7, 2010, December 21, 2010, November 24, 2014, and February 3, 2014.

IV. “No SSO” Certifications

- a. From September 2013 through June 2016, SAM failed to timely submit “no SSO” certifications for 13 different months and failed to submit “no SSO” certifications for 14 different months. Each of these 27 late or missing “no SSO” certification statements violated the 2013 MRP.
- b. From May 2007 through September 2013, and July 2016 through August 2016, SAM also failed to timely submit “no SSO” certifications for 36 different months. Each of these 36 late “no SSO” certification statements violated either the 2006, 2008 or the 2013 MRP, depending on when the violation occurred.

V. Sanitary Sewer Overflow Record Keeping

- a. SAM failed to document various SSO details to substantiate the information in its California Integrated Water Quality System (“CIWQS”)-certified SSO reports, as follows:
  - i. For SSO Event ID 835414, which occurred on May 16, 2017, no documentation regarding how the SSO discharged and SSO recovered volumes were calculated.
  - ii. For SSO Event ID 833531, which occurred on February 28, 2017, no field records could be located at the time of the inspection.

Each day on which the violations identified above occurred in the five years prior to the date of this Notice Letter is a separate and distinct violation of the Clean Water Act.

Each day between May 7, 2013, and May 7, 2018 that SAM has discharged raw and/or inadequately treated sewage from the Intertie Pipeline System is a separate and distinct violation of Sections III.A, III.D and/or III.E of SAM’s 2012 NPDES Permit and the Clean Water Act. Each day between October 1, 2017 and May 7, 2018, that SAM has discharged or continues to discharge raw and/or inadequately treated sewage from the Intertie Pipeline System is a separate

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and distinct violation of Sections III.A, III.D and/or III.E of SAM's 2017 NPDES Permit and the Clean Water Act. SAM's violations will continue each day it discharges SSOs in violation of the requirements of its 2017 NPDES Permit and the Clean Water Act. SAM is subject to penalties for all violations of the NPDES Permits and the Clean Water Act occurring in the five (5) years prior to the date of this Notice Letter.

## VI. CONCLUSION

ERF has retained legal counsel to represent it in this matter. Please direct all communications to the attorneys at the addresses/numbers below:

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William N. Carlon  
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(650) 219-3187  
brian@gaffneylegal.com

Upon expiration of the 60-day notice period, ERF will file a citizen suit enforcement action pursuant to Section 505(a) of the Clean Water Act, 33 U.S.C. § 1365(a), for the above-referenced violations. During the 60-day notice period, however, ERF is willing to discuss effective remedies for the violations noted in this letter. If SAM wishes to pursue such discussions prior to the initiation of litigation, we suggest that it initiate those discussions immediately.

Sincerely,



Andrew L. Packard  
Counsel for Ecological Rights Foundation

cc: James Lamport, Executive Director, Ecological Rights Foundation



**SERVICE LIST**

**VIA CERTIFIED MAIL**

Scott Pruitt, Administrator  
U.S. Environmental Protection Agency  
1200 Pennsylvania Ave., N.W.  
Washington, D.C. 20460

Alexis Strauss, Acting Regional Administrator  
U.S. Environmental Protection Agency, Region IX  
75 Hawthorne Street  
San Francisco, CA 94105

Jeff Sessions, U.S. Attorney General  
U.S. Department of Justice  
950 Pennsylvania Avenue, N.W.  
Washington, DC 20530-0001

Eileen Sobeck, Executive Director  
State Water Resources Control Board  
P.O. Box 100  
Sacramento, CA 95812

Bruce H. Wolfe, Executive Officer  
San Francisco Bay Regional Water Quality Control Board  
1515 Clay Street, Suite 1400  
Oakland, CA 94612

**EXHIBIT A**

EVENT ID	Collection System	SSO Category	Start Date	SSO Vol	Vol of SSO Recovered	Vol of SSO Reached	Surface Water	SSO Failure Point	WDID
841984	Half Moon Bay CS	Category 1	12/1/2017	900	200	700	Pump Station-Controls	2SSO10139	
841784	Half Moon Bay CS	Category 3	11/23/2017	180	50	0	Gravity Mainline	2SSO10139	
841039	Granada Sd CS	Category 3	10/13/2017	10	0	0	Gravity Mainline	2SSO10138	
840818	Half Moon Bay CS	Category 1	10/11/2017	6158	2020	225	Gravity Mainline	2SSO10139	
840503	Montara CS	Category 3	9/26/2017	2	0	0	Gravity Mainline	2SSO10157	
835414	Sam CS	Category 3	5/16/2017	200	200	0	Force Main	2SSO10175	
834641	Sam CS	Category 2	4/16/2017	5625	0	0	Force Main	2SSO10175	
834198	Sam CS	Category 1	4/2/2017	15000	0	15000	Force Main	2SSO10175	
833893	Half Moon Bay CS	Category 1	3/21/2017	300	200	100	Lower Lateral (Public)	2SSO10139	
833531	Sam CS	Category 1	3/1/2017	357000	13000	357000	Force Main	2SSO10175	
832910	Half Moon Bay CS	Category 2	2/20/2017	20000	0	0	Manhole	2SSO10139	
832361	Montara CS	Category 3	1/30/2017	30	30	0	private force main	2SSO10157	
831952	Montara CS	Category 1	1/22/2017	11500	7000	2000	Pump Station-Power	2SSO10157	
831439	Half Moon Bay CS	Category 1	1/4/2017	1125	0	1125	Gravity Mainline	2SSO10139	
829271	Sam CS	Category 2	10/19/2016	2400	500	0	Force Main	2SSO10175	
828254	Half Moon Bay CS	Category 3	9/17/2016	20	20	0	Gravity Mainline	2SSO10139	
827159	Half Moon Bay CS	Category 3	8/9/2016	15	2	0	Gravity Mainline	2SSO10139	
827060	Montara CS	Category 1	8/7/2016	900	0	900	Gravity Mainline	2SSO10157	
826956	Granada Sd CS	Category 3	7/29/2016	10	4	0	Gravity Mainline	2SSO10138	
825687	Montara CS	Category 3	6/17/2016	420	0	0	Gravity Mainline	2SSO10157	
825159	Montara CS	Category 3	5/28/2016	3	0	0	Gravity Mainline	2SSO10157	
825290	Montara CS	Category 3	5/21/2016	225	150	0	Gravity Mainline	2SSO10157	
824672	Montara CS	Category 3	5/17/2016	20	15	0	Gravity Mainline	2SSO10157	
823065	Granada Sd CS	Category 3	3/15/2016	1	1	0	Gravity Mainline	2SSO10138	
823122	Granada Sd CS	Category 3	3/12/2016	100	100	0	Gravity Mainline	2SSO10138	

EVENT ID	Collection System	SSO Category	Start Date	SSO Vol	Vol of SSO Recovered	Vol of SSO Reached	Vol of SSO		SSO Failure Point	WDID
							Surface Water	SSO		
822826	Granada Sd CS	Category 3	3/6/2016	350	300	0	0	0	Gravity Mainline	2SSO10138
822599	Granada Sd CS	Category 3	2/16/2016	1	0	0	0	0	Gravity Mainline	2SSO10138
821674	Granada Sd CS	Category 3	1/31/2016	120	100	0	0	0	Gravity Mainline	2SSO10138
821237	Sam CS	Category 3	1/20/2016	625	400	0	0	0	Force Main	2SSO10175
819457	Half Moon Bay CS	Category 3	11/12/2015	150	0	0	0	0	Gravity Mainline	2SSO10139
819236	Montara CS	Category 3	10/28/2015	5	0	0	0	0	Gravity Mainline	2SSO10157
819024	Granada Sd CS	Category 3	10/19/2015	20	0	0	0	0	Gravity Mainline	2SSO10138
819022	Montara CS	Category 3	10/15/2015	75	0	0	0	0	Gravity Mainline	2SSO10157
819235	Montara CS	Category 3	10/7/2015	10	0	0	0	0	Manhole	2SSO10157
818101	Granada Sd CS	Category 3	8/30/2015	5	0	0	0	0	Gravity Mainline	2SSO10138
817535	Half Moon Bay CS	Category 3	8/20/2015	50	0	0	0	0	Gravity Mainline	2SSO10139
817401	Half Moon Bay CS	Category 2	8/15/2015	1875	1875	0	0	0	Gravity Mainline	2SSO10139
817579	Half Moon Bay CS	Category 3	8/14/2015	600	600	0	0	0	Gravity Mainline	2SSO10139
816685	Half Moon Bay CS	Category 2	7/16/2015	3581	3581	0	0	0	Gravity Mainline	2SSO10139
816683	Half Moon Bay CS	Category 2	7/16/2015	3581	75	0	0	0	Upper Lateral (Public)	2SSO10139
816620	Montara CS	Category 3	7/10/2015	100	50	0	0	0	Gravity Mainline	2SSO10157
815622	Montara CS	Category 3	5/29/2015	1	1	0	0	0	Gravity Mainline	2SSO10157
815400	Montara CS	Category 3	5/21/2015	750	750	0	0	0	Force Main	2SSO10157
812107	Montara CS	Category 3	1/3/2015	265	265	0	0	0	Gravity Mainline	2SSO10157
812110	Montara CS	Category 3	12/31/2014	5	5	0	0	0	Gravity Mainline	2SSO10157
811783	Montara CS	Category 3	12/20/2014	530	530	0	0	0	Gravity Mainline	2SSO10157
811436	Sam CS	Category 3	12/13/2014	500	0	0	0	0	Force Main	2SSO10175
811604	Half Moon Bay CS	Category 1	12/11/2014	99850	0	0	99850	0	Manhole	2SSO10139
811405	Montara CS	Category 3	12/11/2014	875	0	0	0	0	Pump Station-Controls	2SSO10157
810421	Half Moon Bay CS	Category 3	9/24/2014	330	330	0	0	0	Gravity Mainline	2SSO10139
810402	Half Moon Bay CS	Category 3	9/11/2014	675	0	0	0	0	Gravity Mainline	2SSO10139
810250	Montara CS	Category 3	9/9/2014	75	0	0	0	0	Gravity Mainline	2SSO10157

EVENT ID	Collection System	SSO Category	Start Date	SSO Vol	Vol of SSO			SSO Failure Point	WDID
					Recovered	Surface Water	Reached		
808911	Half Moon Bay CS	Category 2	8/30/2014	8250	0	0	0	Gravity Mainline	2SSO10139
808001	Half Moon Bay CS	Category 2	7/27/2014	1250	0	0	0	Gravity Mainline	2SSO10139
807222	Half Moon Bay CS	Category 2	6/23/2014	5550	0	0	0	Gravity Mainline	2SSO10139
807692	Granada Sd CS	Category 3	5/27/2014	165	35	0	0	Gravity Mainline	2SSO10138
806329	Half Moon Bay CS	Category 3	5/21/2014	500	0	0	0	Gravity Mainline	2SSO10139
805803	Half Moon Bay CS	Category 3	3/21/2014	449	200	0	0	Gravity Mainline	2SSO10139
805804	Half Moon Bay CS	Category 3	3/21/2014	3	0	0	0	Gravity Mainline	2SSO10139
803996	Half Moon Bay CS	Category 1	2/17/2014	2063	0	2063	0	Gravity Mainline	2SSO10139
803569	Sam CS	Category 1	2/2/2014	693	0	693	0	Force Main	2SSO10175
804314	Granada Sd CS	Category 3	1/22/2014	577	400	0	0	Gravity Mainline	2SSO10138
800431	Granada Sd CS	Category 3	10/19/2013	400	350	0	0	Gravity Mainline	2SSO10138
798461	Sam CS	Category 3	9/4/2013	5	0	0	0	air release valve	2SSO10175
797045	Granada Sd CS	Category 3	7/16/2013	50	0	0	0	Main	2SSO10138