2015 ANNUAL REPORT

INDUSTRIAL WASTE PRETREATMENT PROGRAM COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

GRACE ROBINSON HYDE CHIEF ENGINEER AND GENERAL MANAGER

SUBMITTED February 29, 2016

APPENDIX H
INDUSTRIAL WASTE REPORTS ON INCIDENTS

| | | 20 | <mark>15 SUM</mark> | MARY | OF TRE | ATMEN | IT PLAN | NT INCI | DENTS | | | | |
|------------------------|-------|--------------|---------------------|--------|--------|--------|------------|------------|-------------|------------|-------------|---------------|-------|
| Type of Incident | JWPCP | SJC-E WRP | SJC-W WRP | LC WRP | LB WRP | WN WRP | POM WRP | VAL WRP | SAUG WRP | LAN WRP | PALM WRP | La Can WRP | Total |
| COD/Solids/ Ragging | 2 | 1 | 0 | 1 | 0 | 0 | 0 | 0 | 0 | 1 | 0 | 0 | 5 |
| Metals/ Cyanide | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Toxicity | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| pH High | 0 | 0 | 0 | 1 | 1 | 0 | 1 | 0 | 0 | 0 | 0 | 0 | 3 |
| pH Low | 0 | 0 | 0 | 0 | 1 | 0 | 0 | 0 | 0 | 1 | 0 | 0 | 2 |
| Turbidity | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 1 | 0 | 0 | 1 |
| Grease | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| LEL | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| NDMA | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Color | 0 | 1 | 0 | 2 | 0 | 0 | 0 | 0 | 0 | 2 | 0 | 0 | 5 |
| Foam | 2 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 1 | 0 | 0 | 3 |
| Chloride | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Odor | 1 | 0 | 0 | 0 | 0 | 0 | 0 | 1 | 1 | 2 | 0 | 0 | 5 |
| Ammonia | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 1 | 0 | 0 | 0 | 1 |
| Sulfides | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Tri Halo Methane | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Total | 5 | 2 | 0 | 4 | 2 | 0 | 1 | 1 | 2 | 8 | 0 | 0 | 25 |

| 2015 PUMP PLANT INCIDENTS INVESTIGATED | | | | | | | |
|--|---|--|--|--|--|--|--|
| EXCESS FLOW | 1 | | | | | | |
| PERSONAL WIPE RAGGING | 0 | | | | | | |
| OTHER RAGGING | 0 | | | | | | |
| FLAMMABILITY/LEL | 0 | | | | | | |
| COLOR | 0 | | | | | | |
| ODOR | 0 | | | | | | |
| CORROSION | 0 | | | | | | |
| EXCESS MAINTENANCE | 0 | | | | | | |
| OILY SLUDGE | 0 | | | | | | |
| TOTAL | 1 | | | | | | |

^{*}In 2009 Compton Yard installed improved pumps that chopped personal wipes

| 2015 SURFACE DISCHARGE IN | 2015 SURFACE DISCHARGE INCIDENTS INVESTIGATED | | | | | | | |
|---------------------------|---|--|--|--|--|--|--|--|
| IU - SPILL | 6 | | | | | | | |
| RIVER SPILL/DUMP | 0 | | | | | | | |
| FUEL/SOLVENT | 1 | | | | | | | |
| CHEMICAL/PAINT SPILL | 3 | | | | | | | |
| SEPTIC WASTE DUMP | 0 | | | | | | | |
| GROUNDWATER CONTAMINATION | 0 | | | | | | | |
| NUISANCE DISCHARGE | 2 | | | | | | | |
| Total | 12 | | | | | | | |

| 2015 SEWER INCIDENTS INVESTIGATED | | | | | | | | |
|-------------------------------------|----|--|--|--|--|--|--|--|
| Elevated H2S reported by Sewer crew | 0 | | | | | | | |
| ODOR- Sulfide | 0 | | | | | | | |
| ODOR-Other | 1 | | | | | | | |
| FIRE INVESTIGATION: Non-refinery | 2 | | | | | | | |
| FOAM | 0 | | | | | | | |
| OIL/FUEL/SOLVENT | 1 | | | | | | | |
| RAGGING | 0 | | | | | | | |
| EXCESS SOLIDS | 4 | | | | | | | |
| SCALE | 0 | | | | | | | |
| Elevated LEL reported by sewer crew | 14 | | | | | | | |
| HIGH pH | 1 | | | | | | | |
| CORROSION | 0 | | | | | | | |
| RAINWATER | 0 | | | | | | | |
| COLOR | 0 | | | | | | | |
| BLOCKAGE/SSO Due to Grease | 2 | | | | | | | |
| BLOCKAGE/SSO Not due to Grease | 2 | | | | | | | |
| ILLEGAL ACCESS TO MANHOLE | 0 | | | | | | | |
| EXCESS FLOW | 1 | | | | | | | |
| ILLEGAL DUMP | 1 | | | | | | | |
| MISC. | | | | | | | | |
| Total | 29 | | | | | | | |

| 2015 SUMMARY OF INCIDENT REFERRALS | | | | | | | | | | | | |
|------------------------------------|------|-----------------------------|------|-----------------|-----------|---------------------------|----------------|---------------------------|------------------|----------------------|-------|--|
| | | | | | Nature of | Incident | | | | | | |
| | | User off-sp nitted disch | | IU Equipment | Odor | Refinery Fire or impound | Sewer | Misc. Haz or Non- | Non- | Non- sewer | | |
| Caller ID | Acid | Oil | Misc | Malfunctio n | Reports | of off spec waste reports | Excess Flow | Haz Sewer Discharge | Refinery Fire | related incidents | Total | |
| IU Release | 5 | 1 | 21 | 13 | 0 | 8 | 0 | 2 | 1 | 2 | 53 | |
| IU SMR Call | 0 | 0 | 12 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 12 | |
| Public Agency | 1 | 1 | 4 | 0 | 0 | 0 | 0 | 3 | 0 | 2 | 11 | |
| IWMC or CSD | 70 | 0 | 2 | 1 | 1 | 0 | 0 | 0 | 1 | 1 | 76 | |
| Citizen | 0 | 0 | 1 | 0 | 0 | 0 | 0 | 3 | 0 | 1 | 5 | |
| Anonymous | 0 | 1 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 1 | 2 | |
| News Report | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 1 | 1 | 2 | |
| Total | 76 | 3 | 40 | 14 | 1 | 8 | 0 | 8 | 3 | 8 | 161 | |

| 2015 LIQUID WASTE DISPOSAL STATION REFERRALS | | | | | | | | | | | |
|---|------------------|------------------|---|----------------|---------------|------------------------|-------------------------|------|-------|--|--|
| | EXCESS SOLIDS | EXCESS GREASE | | LOW/HIGH pH | EXCESS TDS | SUSPICIOUS ACTIVITY | INAPPROPRIATE SOURCE | MISC | TOTAL | | |
| Attendant calls for assistance or investigation | 0 | 1 | 2 | 7 | 25 | 1 | 2 | 5 | 43 | | |

INDUSTRIAL WASTE SECTION SUMMARY OF ACTIVITIES FOR THE MONTH OF JANUARY 2015

TREATMENT PLANT/SEWER/OTHER INCIDENT INVESTIGATIONS

Long Beach WRP Low pH

On Monday, 1-5-15 at 2226 hours, Senior Pumping Plant Operator Randy Bones of the Long Beach Main Pump Plant Alarm Center called Supervising I.W. Inspector John Boyd at home. Bones informed Boyd that operators at the Los Coyotes WRP, who remotely monitor conditions at the Long Beach WRP during off-hours, had asked him to call the I.W. Section to notify them that the LBWRP was having low pH influent. Boyd then called Treatment Plant Operator Rudy Fernandez at LCWRP back to get more information. Fernandez reported that at 2115 hours the influent pH dropped to 6.55, by 2200 hours. Fernandez also reported LBWRP Supervising TPO Bob Dunn had also been contacted at home and had instructed that a TPO be sent to LBWRP to check the influent pH probe/meter, survey the situation, and collect a sample if appropriate. By 2220 hours the TPO sent to LBWRP had reported back that he had verified the influent pH meter and probes were working properly and were accurate. A raw grab sample was taken at 2225 hours. The TPO noted the raw influent had a normal appearance, color, and odor. The pH continued to slowly drop, reaching 6.0 at 2350 hours. I.W. Inspectors, under the leadership of Supervising I.W. Inspector David Sanchez, responded to the incident at 0630 hours on Tuesday, 1-6-15, per Boyd's decision that an immediate response during graveyard shift hours was unwarranted.

I.W. Inspector Jason Finn went to the Long Beach WRP at 0700 hours to pick up the raw sample collected the night before and check on the current status of the plant. It was noted that at 0700 hours the influent pH meter was indicating a low pH of 5.3. A sample of the raw influent was again collected and analyzed immediately at the treatment plant laboratory, where it was found to have a pH of 7.4. The sample collected the previous evening at 2225 hours was also analyzed and found to have a pH of 7.3. Subsequent close examination of the influent pH meter confirmed it had drifted out of calibration and it was concluded the entire previous evening's low pH readings that caused the incident were due to the WRP's influent pH meter reading anomalously low. The cause of the drifting was unknown. Senior I.W. Inspector Andy Woods and Supervising I.W. Inspector Sanchez spoke to WRP operators and made them aware of the faulty pH meter. Operators stated they would correct the problem. Note that I.W. Inspectors inspected three industrial facilities as possible sources for this incident prior to it being concluded that the incident cause was the faulty WRP pH meter. Nothing unusual was noted at these industrial facilities.

Tip of Illicit Waste Dumping at Torrance Metal Recycling Facility

On Friday, 1-9-15 at 1013 hours, Federal EPA Criminal Investigator Chris Anderson left a voicemail message for John Boyd asking Boyd to call him back regarding a tip received on the EPA's "duty call line" of possible illicit discharge into the sewer and/or storm drain at a metal recycling facility in Torrance. At 0855 hours on Monday, 1-12-15 Boyd called Anderson. Anderson said a tipster had called EPA and reported the illicit dumping of liquid materials into either a sewer or storm drain at American Metal Recycling Corp located at 1011 Francisco Street in Torrance. The tipster alleged the material being dumped was metal washing wastewater containing metals and solvent residual. Anderson reported that after receiving the tip he had gone to the facility on 1-9-15 and driven the perimeter of it, but not entered it. He said he observed no evidence of any ongoing discharge activity but did notice some minor staining around what appeared to be a parking lot drain on the east side of the facility. Anderson wanted to know if the Sanitation Districts had any records or experience at the site. Boyd told Anderson he'd check Districts' records and get back to him shortly.



Figure 1: Google Maps satellite image showing the American Metal Recycling Corp facility in Torrance. Note the location of the storm drain at the loading dock area.

Research of Districts' records indicated the facility had never been inspected by Districts' I.W. inspectors. On Monday, 1-12-15 Boyd informed area I.W. Inspector Michael Placencia of the tip. On Wednesday, 10-14-15 Placencia reported he had conducted an inspection at the American Metal Recycling Corp facility on the morning of Tuesday, 1-13-15, finding essentially no evidence of any illicit discharges of waste materials into the sewer or storm drain. Waste manifests indicated the liquid wastes, primarily cutting oils, generated on-site from their collection and recycling of waste metals such as titanium and stainless steel cuttings from machine shop operations, were being hauled off for proper disposal. Placencia confirmed there was some minor oil staining around what appeared to be a grated storm drain in the east loading dock bay area. Placencia said that when he arrived on-site a Los Angeles County Fire Heath Hazmat inspection team was already on-site preparing to perform a follow-up inspection to a titanium fire incident that occurred at the facility on 12-20-14. Placencia said he felt he was able to "blend in" with the Fire Department inspectors such that the company was unaware he was there in follow-up on the tip received by the EPA. Boyd left this information for EPA Agent Anderson in a voicemail message on 1-14-15.

Referral of Firewater Discharge to the Sewer at the Tosco Oil Refinery in Wilmington

On Tuesday, 1-13-15 at 0908 hours, John Boyd was forwarded an email which had been sent to I.W. Section Head Dave Snyder. The email was from Districts' Waste Management Department Head Vicki Conway and contained basic information, including a recorded voice mail message attachment from an unnamed female Districts' security guard reporting she had received a call from a Mr. Alfonso Berumen (213-200-9857) who was reporting there was a release of petroleum into the sewer at the Tosco ("Phillips 66") oil refinery located at 1660 W. Anaheim Street in Wilmington. The email stated the call to the security guard had been received at 0149 hours on Sunday, 1-11-15.

Boyd noted the Tosco refinery in question is not generally considered to be upstream of Districts' sewers or treatment plants. Instead the facility, which is located in the Wilmington area of the City of Los Angeles, discharges into city sewers and is tributary to the City of Los Angeles Bureau of Sanitation's Terminal Island Water Treatment Plant. At 0915 hours on 1-13-15 Boyd called Mr. Berumen, who is a Hazardous Materials Investigator with the Los

Angeles County Fire Department's Health/Hazmat Division, to obtain more information. Mr. Berumen reported he, along with the City of Los Angeles Fire Department, had responded to a fire at the Tosco refinery on Saturday, 1-11-15. A large fire was observed in the refinery's "Unit 100 Distillation Unit," which burned from 0855 hours until 1930 hours that evening. Berumen said he observed petroleum contaminated firewater running off from the area of the fire and then potentially into the sewer system. Berumen said he felt this situation should be reported as a spill. However, when he approached refinery managers about their making such notification calls to the State Office of Emergency Services (OES) Spill Report line and other agencies, the refinery managers refused, telling him they didn't believe notification calls were warranted given what they believed was the small amount of petroleum material involved. Berumen said he decided to then report the spill to OES himself and he then also notified the Sanitation Districts sometime during what he termed as the "mid-afternoon" of 1-10-15.

At 0925 hours on 1-13-15 Boyd called Chief Industrial Waste Inspector II Bellete Yohannes of the City Los Angeles' Bureau of Sanitation. Boyd asked Yohannes if he was aware of the 1-10-15 fire at the Tosco oil refinery in Wilmington and the possibility that petroleum laden firewater could have been discharged to the sewer or storm drain. Yohannes reported he was personally unaware of the incident but would look into it. He said he was also unaware of any related calls his office might have received from the downstream Terminal Island Treatment Plant. Since the Tosco oil refinery is not upstream of Districts sewers or treatment plants, no further action on this incident by Districts' I.W. Section staff is anticipated.

Caustic Solution Release at Bleach Manufacturer in Carson

On Friday, 1-16-15 at 0836 hours, Supervising I.W. Inspector David Sanchez observed a spill report on the California Emergency Management Agency website indicating 394 pounds of 50 percent sodium hydroxide solution was released at JCI Jones Chemicals in the Harbor Gateway area of Los Angeles adjacent to Carson. The report indicated the spill occurred due to a damaged pipe caused by engineer error during the switching of rail cars at 1514 hours on Thursday, 1-15-15. The report stated the cleanup was in progress.

Area I.W. Inspector Michael Placencia inspected the JCI Jones Chemicals facility on 1-16-15. The facility receives 50 percent sodium hydroxide solution (aka "caustic") where it is reacted with chlorine gas to produce sodium hypochlorite ("bleach"). In this manner, they produce 30 million gallons of bleach per year, placing them among the two top manufacturers nationwide. The spill was the result of a railroad tanker car rolling about 5' past a track end barrier (see attached photos), where it broke a length of 3" diameter caustic pipe along with a potable water pipe. This was about 22 feet past the usual stopping point where the cars are chocked and loaded/unloaded. About 30 gallons of caustic solution spilled and all of the spilled material, including the potable water, was only about 300 gallons. The entire spill was successfully contained within the existing spill containment system. The limited size of the spill was primarily due to the quick reactions of an operator who turned off the supply valve to the broken water line. An outside contractor, United Pumping Services, was brought in to remove and dispose of the spilled material. The spilled material was neutralized with citric acid before it was vacuumed up and hauled for proper disposal. The emergency spill response included several agencies, including the Los Angeles County Fire Department. There was no impact to the sanitary sewer and none of the spilled material ran off the property. No further follow-up is anticipated.

It was noted that the JCI Jones Chemicals Facility sits on a portion of the old Montrose Chemical site, the source of long term DDT discharge into sewers, which passed through the JWPCP decades ago. Most of the Montrose facility site remains a superfund clean-up site due to DDT soil and groundwater contamination that occurred there.



Figure 2: Google Maps satellite view of the JCI Jones Chemicals and Montrose Chemical superfund sites.



Figure 3: Google Maps satellite view from Figure 1 zoomed in on with area of the railcar unloading/loading area where the 1-15-15 accident/spill occurred.



Figure 4: Google Maps Satellite view further zoomed in showing the rail spur ending just below the cooling towers and tank farm where the tanker car overran the end of the track causing the spill.



Figure 5: 1-16-15 photo taken by Inspector Placencia showing the railroad tanker car that overran its normal stopping point where it smashed into a 3" caustic transfer line and potable water pipe.



Figure 6: Broken potable water line. Note the valves which were quickly closed to limit the spill volume.

Tip of Illicit Waste Dumping at City of Commerce Printing Facility

On Thursday, 1-22-15 at 1415 hours, John Boyd received a telephone call from Los Angeles County Fire Department Health and Hazardous Material Senior Investigator Eric Bald reporting that earlier that day his agency had received a telephone call tip alleging the illicit discharge of waste UV printing inks, wash water, waste fountain solution, and solvents into a sink drain at Zoo Printing, a large off-set printing operation with two large buildings located across the street from one another in the cities of Commerce and Bell. The tipster said that Zoo Printing had been doing this for years. He identified the sink as being "behind the green tank" but did not specify which of the buildings the sink was in. Bald said his review of his agency's facility inspections for these buildings indicated their most recent inspection was about a year ago where no problems were noted. Bald said their inspection found hazardous waste manifests for waste generated at one of the buildings (5700 Bandini Blvd.), but not the other (4710 Eastern Ave.). Bald and Boyd discussed how to initiate the investigation. Bald said he was wondering if the Districts could conduct surveillance sampling to try to catch the company illicitly discharging the waste materials. Review of the Districts' GIS indicated it likely both buildings have direct connections to separate 21" and 39" trunk sewers that contain large enough flows that surveillance sampling is likely to be ineffective. Given this, it was agreed the initial step of the investigation would be to have a Districts' I.W. inspector conduct inspections at both facilities. Note that there was no record in Districts' records that either of the two Zoo Printing facilities had been inspected since the company moved into the buildings about 10 years ago.



Figure 7: GIS map showing the location of the Zoo Printing facilities in relationship to nearby Districts' trunk sewers.

Area I.W. Inspector Ken Hanks inspected the Zoo Printing facilities on Monday, 1-26-15. He found no evidence of any illicit discharges. The company claimed, and waste handling and hauling documents on-site supported, that they haul all waste inks, solvents, and fountain solutions offsite for proper disposal. Hanks determined that the company was exempt from being required to obtain an industrial wastewater discharge permit. No further follow-up is anticipated at this time.

JWPCP Black Gelatinous Foam in Primary Skimmers

On Tuesday, 1-27-15 at 1510 hours, John Dyer, STPO II at JWPCP called Supervising I.W. Inspector John Boyd to report that during the graveyard shift on 1/26-1/27 black foamy gelatinous material was found at the primary skimmers located downstream of the J.O. "A" headworks. Dyer stated this incident could have begun on 1-26-15 during the swing shift. The black material did not hamper any of the plant operations. There were no reported odor, LEL, or pH abnormalities at the plant. A sample of the material was taken by operators at 0400 hours for possible analysis. Dyer thought a similar situation had occurred last year. At 1520 hours, Boyd notified night team Supervising I.W. Inspector Barbara Jenkins of the incident.

Jenkins followed-up at the JWPCP. Her investigation found that on Sunday, 1-25-15, the JWPCP experienced an unscheduled shut down. Computer failures occurred at the primary, secondary, and solids plants. Both the primary and secondary plants were able to continue their operations, but solids completely shut down. On Monday, 1-26-15, the solids plant went back into full operation. Between 2130-2200 hours none of the reported unusual black material had yet been observed at the primary skimmers by an operator working his final rounds during swing shift. The sample taken by operators on 1-27-15 was examined later the same day by swing shift operators. They stated that the sample looked and smelled like digester sludge. It is the opinion of the operators that the material observed at E3-South's primary skimmers was thickened centrate from the JWPCP's solids dewatering facility that overflowed into the centrate channel that flows into the J.O. "A" trunk sewer. No further unusual black material was observed at the primary skimmers and no further investigation is anticipated.

Elevated Carbon Monoxide Concentrations in the Headspace of the Irwindale Trunk Sewer

On Wednesday, 1-28-15 at 0845 hours, San Gabriel Yard Sewer Maintenance Supervisor Bill Balas called John Boyd and reported elevated carbon monoxide (CO) headspace gas concentrations at Manholes 22 1037 (65 ppm) and 22 1036 (62 ppm) on the Irwindale Trunk (Section 1) at 0840 hours. These two manholes make up the downstream and upstream manholes

respectively, of a sewer siphon structure. Sewer maintenance crew workers also reported the headspace gas had an unusual odor as well.

Field investigation by Senior I.W. Inspector Steve Sealy and area I.W. Inspector Nguyen Dang traced the elevated CO concentrations to an industrial source located immediately upstream, Huy Fong Irwindale, LLC. Further research revealed that the CO, LEL, and sulfide detectors of the 4-gas meter used to test the sewer headspace gas concentrations by the Districts' sewer maintenance crews are subject to known interferences from mercaptan and similar organic molecules, including capsaicin. Huy Fong Irwindale is a large sriracha sauce manufacturing company. The sriracha sauce's main ingredient is chili peppers which contain high concentrations of capsaicin. Industrial wastewater containing residual sauce from the washing of sauce blending tanks and bottling line equipment is discharged into the sewer as allowed under the company's active industrial waste discharge permit. Testing of the headspace gas in the industrial wastewater sampling box at Huy Fong Irwindale indicated a positive reading for CO which corresponded to the finding of high CO concentrations downstream in the trunk sewer. A direct test of the chili sauce from a bottle also set the meter's CO alarm off. There is no other evidence that actual CO, normally a byproduct of incomplete combustion, was present in the sewer headspace gas. Balas was advised of these findings. No further investigation to this unusual incident is anticipated.

Huy Fong Irwindale, LLC 4800 Azusa Canyon Road Irwindale, CA 91706 IW 20758 16,800 GPD



Figure 8: GIS sewer diagram/map showing relationship between the manhole location with high carbon monoxide headspace gas concentration and Huy Fong Irwindale, LLC.



Figure 9: Districts' sewer maintenance crew 4-gas meter indicating 62 ppm of carbon monoxide in the headspace gas in Irwindale trunk sewer Manhole 22 1036.



Figure 10: Districts' 4-gas meter indicating 40 ppm of carbon monoxide, along with elevated LEL and hydrogen sulfide concentrations in the headspace gas of the industrial wastewater sampling box at Huy Fong Irwindale, LLC in Irwindale.

INDUSTRIAL WASTE SECTION SUMMARY OF ACTIVITIES FOR THE MONTH OF FEBRUARY 2015

TREATMENT PLANT/SEWER/OTHER INCIDENT INVESTIGATIONS

Low pH Discharge at Goodrich Corp in Santa Fe Springs

On Monday, 2-2-15 at 1255 hours, Mr. Diego Torres, Director of Operations at Goodrich Corp called Supervising I.W. Inspector John Boyd and self-reported that his company had discharged low pH industrial wastewater earlier that day. Torres stated that due to a scrubber system failure they had discharged approximately 2400 gallons of acidic wastewater with a pH of 2-3 for a 5-hour period from midnight until 0500 hours on 2-2-15. Torres said the flow being discharged during the period was essentially constant at about 8 gpm. Torres stated the scrubber equipment was now functioning properly and the discharge was now within limits.

Goodrich Corporation 11120 S. Norwalk Blvd Santa Fe Springs, CA 90670 IW 21232 15,000 GPD

Area I.W. Inspector Jason Finn conducted follow-up inspections on 2-2-15 and 2-5-15. This facility produces carbon fiber brake pads and thermal insulation sheets used in the aerospace industry. At the time of inspection on 2-2-15 the wastewater discharge pH was 11.3. There were no adverse effects from the low pH wastewater discharge observed at the downstream treatment plant, Los Coyotes WRP. The inspection indicated the incident was caused by a failed caustic addition pump used to adjust the pH of the wastewater generated in the facility's hydrochloric acid fume air scrubber system. It was unclear if the alarm system the facility uses to alert them to such a system failure worked or was just unnoticed or ignored by operators. Company managers subsequently opted to cease all treatment and discharge of the acidic wastewater in question and have it collected and hauled for proper disposal instead. Managers are evaluating the reliability of the current system and the cost/benefits of whether or not to improve the system or simply haul the wastewater offsite permanently. A verbal warning was issued, as is generally the case for self-reported violations, to the company for the low pH discharge.

Low pH Discharge at General Mills in Carson

On Sunday, 2-15-15 at 0715 hours, Long Beach Main Pump Plant Operator Anthony Gould notified Senior I.W. Inspector Bill Barnum that he had just received a call from Environmental Engineer Dexter Deane of General Mills in Carson self-reporting multiple low pH discharges that past night and morning that were caused by a ruptured acid hose line in their clean-in-place (CIP) system.

General Mills Operations Inc. IW 16154 300,000 GPD 1055 E. Sandhill Ave. Carson, CA 90746

This General Mills facility houses the production operations of Yoplait yogurt products. After alerting JWPCP operators there was the potential for low pH wastewater to enter the treatment plant, Barnum went to the General Mills facility, arriving on-site at 0840 hours on 2-15-15. His investigation revealed that approximately 600 gallons of acidic CIP sanitizer solution (AC-55-5 Red containing 38% nitric acid by weight) was periodically released from a ruptured acid line into an open drain which fed into the facility's industrial waste pretreatment system, overwhelming it on the afternoon and evening of Saturday, 2-14 and morning of Sunday, 2-15. As a result, low pH wastewater was discharged into the sanitary sewer. Over an 18-hour period there were multiple low pH violations that were as low as pH=2. Upon his arrival at 0840 hours, Barnum noted the effluent pH was in compliance. The company had replaced the ruptured line but had yet to refill the empty 1,000-gallon CIP acidic sanitizer tank.

JWPCP operators noted that influent pH readings were normal on both Saturday, 2-14 and Sunday, 2-15. JWPCP operations were normal throughout both days as well.



Figure 1: CIP system pump room at General Mills on 2-15-15. Note the diaphragm pumps above and the open floor drain directly beneath where the spilled acid entered the facility's industrial wastewater collection system.



Figure 2: Ruptured acidic sanitizer solution flexible hose line at General Mills on 2-15-15.

Follow-up inspections by area I.W. Inspector Shawn Cleaver found that facility managers had implemented level sensor improvements to the acid delivery system to prevent a repeat of the incident. The flexible hoses attached to pumps will be replaced by hard plumbed lines. Additionally, Cleaver will recommend the facility be subject to the Districts' Slug Discharge Control and Spill Containment program. A verbal warning was issued, as is generally the case for self-reported violations, to the company for the hose line equipment violation that caused the spill and the low pH discharge.

Explosion and Fire and the ExxonMobil Torrance Oil Refinery

On Wednesday, 2-18-15 at 0908 hours, Environmental Advisor Amy Kim of the ExxonMobil oil refinery in Torrance called Supervising I.W. Inspector John Boyd and reported the refinery had just had an explosion and was now fighting an ongoing fire. She reported in-house refinery fire fighters were responding along with the City of Torrance Fire Department. She said it was unclear what unit the explosion/fire occurred in, but refinery operators were impounding all firewater and had ceased all flow to the industrial wastewater discharge outfalls.

Supervising I.W. Inspector David Sanchez was notified of the report immediately and he coordinated response to the scene by Senior I.W. Inspector Bill Barnum and area I.W. Inspector Michael Placencia. Boyd also notified JWPCP Manager Ken Rademacher of the situation and its potential to impact the treatment plant, though it was acknowledged the risk of impact was currently perceived to be low given the refinery claim of having ceased its discharges to the sewer.

ExxonMobil Oil Corporation 3700 W 190th St. Torrance, CA, 90503 IW 516 4,100,000 GPD



Figure 3: Google maps aerial diagram of the ExxonMobil refinery in Torrance. Note the location of the Electrostatic Precipitator (ESP) unit where the explosion occurred in relationship to the two permitted industrial wastewater outfalls at the facility.



Figure 4: Inspector street view photo looking west from Crenshaw Boulevard at the ESP unit on 2-18-15. Note the walls of the unit have been bowed and blown outward by the force of the explosion in the unit.



Figure 5: KABC News helicopter picture of the damaged ESP unit and surrounding area covered in debris.

Barnum and Placencia arrived onsite at the refinery at 0930 hours on 2-18-15. It was determined the refinery had experienced an explosion at the electrostatic precipitator unit which caused damage to some surrounding units such as the pretreater and fluid catalytic cracking unit. There was no lingering fire after the flash explosion and flammable gases from the surrounded units were purged to the south flare station. Leaks from the damaged units were contained with suppression firewater which was accumulating in spill containment areas on-site. Inspections of the downstream sewer lines and offsite monitoring stations determined that there was no impact to the collection system or JWPCP since the refinery was able to shut off flow and initiate firewater impound procedures. Inspectors followed up with the refinery to determine proper disposition of the impounded firewater, and although the refinery was subsequently issued a written notice of violation for failing to properly notify the Districts during one of the discharges of treated firewater, there were no negative impacts to the collection system or JWPCP since the refinery was able to properly treat the discharge and meet all applicable discharge limits as verified by follow-up sampling activity conducted by the I.W. inspection staff.

Lancaster WRP Elevated Secondary Effluent Turbidity

On Monday, 2-23-15 at 0707 hours, Lancaster WRP Supervising Treatment Plant Operator Dan Shubin called John Boyd and reported that the treatment plant had experienced two elevated secondary turbidity and high dissolved oxygen level incidents on the evenings of Saturday, 2-21-15 and Sunday, 2-22-15. He said the secondary turbidity rose both evenings at 2035 hours, reaching 5 NTU. No operators were onsite either day so it is unknown if the material that caused the incidents had any unusual odors or color. The plant has no influent pH meter so it's also unknown if there were any pH excursions associated with the incidents. Shubin stated the elevated turbidity lasted about 2-3 hours. He estimated the material causing the incidents entered the plant 6-8 hours prior to the turbidities rising. He referenced a similar series of incidents that occurred about a year earlier that were reported to the I.W. inspection staff but for which no source was identified. Shubin reported final effluent turbidity levels were unaffected and there were no violations of any waste discharge requirements.

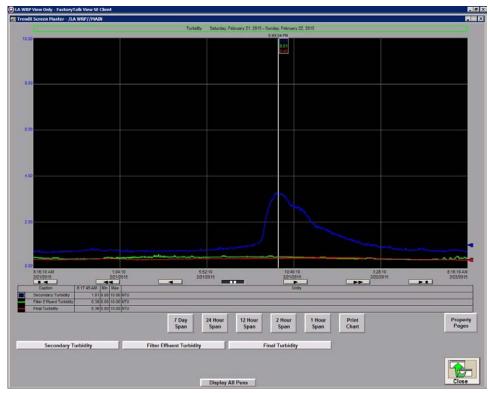


Figure 6: 2-21-15 through 2-22-15 Lancaster WRP secondary turbidity chart.

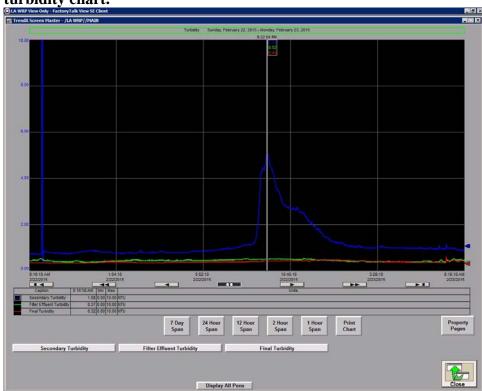


Figure 7: 2-22-15 through 2-23-15 Lancaster WRP secondary turbidity chart.

Area I.W. Inspector Jonathon Powell inspected the major dischargers upstream of the treatment plant. These inspections and laboratory analysis of samples taken from WRP primary buckets failed to identify the source of the DO/turbidity issues. No evidence of any unusual activities or recent off-spec discharges was found at the State Prison (the largest discharger to the WRP). Lab analysis performed on the WRP primary sampling buckets taken during the initial event, including COD and heavy metals analysis, showed no abnormal results. WRP operators

indicated the DO/turbidity issues decreased over the 7-8 days after the initial report and levels eventually returned to normal. I.W. inspectors continue to monitor the operations at the treatment plant and upstream dischargers in case the issue is reported again in the future.

Concrete Solids in Long Beach Local Sewer Line

On Monday, 2-23-15 at 1330 hours, Supervising I.W. Inspector David Sanchez observed two National Plant Services (NPS) vehicles working in a local sewer line in the street downstream of the Districts' Long Beach Main Pump Plant (LBMPP) in Long Beach. Sanchez spoke with the NPS personnel, who stated they were removing cement or mortar like material stuck to the inside of the sewer line in the 1400 block of West 16th Street. NPS personnel indicted they had been working on the local line since at least the previous Friday, 2-20-15, working their way upstream from Canal Street. They stated the cement material was progressively thicker the further upstream they went.



Figure 8: Layered concrete removed from Long Beach local sewer line by hydroblasting operations by National Plant Services on 2-15-15.

Area I.W. Inspector Sanjay Patel followed-up with City of Long Beach Code Enforcement Officer Keith Wardlow on 2-23-15 and 2-24-15. According to Wardlow, the concrete found in the local sewer line came from concrete washout slurry periodically overflowing a pit with an old sewer connected drain at the LBMPP construction site. These overflows occurred over a period of several months and went unnoticed by site workers. Further investigation by Patel and Sanchez, which included contacting City of Long Beach Sewer Maintenance Supervisor Ed Mendoza, revealed that LBMPP prime contractor Prado Construction was responsible for the discharges and had contracted NPS to hydroblast the impacted local line and removes the concrete debris. Patel and Sanchez met with Steve Mueller from Prado Construction. Mr. Mueller explained exactly how the concrete slurry that got into the sewer had periodically overflowed from an excavation pit over a nine-month period, eventually impacting the local sewer line for about 1200' downstream. It was noted that at no time were any Districts' trunk sewers or downstream collection system lines or treatment plant operations affected by this incident.

Lancaster WRP Fluorescent Green Color

On Friday, 2-27-15 at 1500 hours, Lancaster WRP Treatment Plant Operator II Jim Barrick and Supervising Treatment Plant Operator Dan Shubin called Supervising I.W. Inspector John Boyd and reported that the treatment plant had a strong green color throughout the primary tanks. They reported the color was no longer entering the plant but were unsure as to when exactly it had started coming in, though presumably this had occurred within the previous

1-2 hours since the color was not yet in the secondary tanks. Operators took two 1.0 L samples of the green colored primary tank wastewater for possible analysis. The green colored wastewater had no unusual odors. The colored material did not adversely affect treatment plant operations indicating it may be a non-toxic fluorescein dye. No violation(s) of waste discharge requirements resulted from this incident.



Figure 9: Green color in a Lancaster WRP primary tank on 2-27-15.



Figure 10: Green color sample taken on 2-27-15 from a Lancaster WRP primary tank.

The investigation by current area I.W. Inspector Jonathon Powell and former area I.W. Inspector James McCurdy to find the source of the green color included site inspections at multiple upstream industrial dischargers as well as laboratory comparison analysis of the colored wastewater with various dyeing agents. However, no definitive source was identified. It was

noted that a large (approximately 10,900-gallon) accidental discharge of somewhat similarly colored chilling system coolant water from a Lockheed Martin Corporation facility (Plant 10) in north Palmdale had occurred at a time that corresponded well with the color incident at the WRP. But extensive follow-up and investigation of this discharge ultimately indicated the chiller coolant would have flowed to the Palmdale WRP, not the Lancaster WRP. Palmdale WRP operators did not report or observe any green-colored material coming into their plant on 2-27-15. Lab analysis indicated the color seen in the treatment plant had chemical characteristics matching those seen in fluorescein dyes typically used for water/sewer pipe testing. Multiple sewer agencies including those at the Districts' Sewer Maintenance, the City of Lancaster, the Los Angeles County Department of Public Works, and the City of Palmdale were contacted regarding possible maintenance projects involving the use of colored dyes, but all denied any activity was performed during the suspected time of the event. I.W. Inspectors continue to monitor the operations at the treatment plant and upstream dischargers in case the issue is reported in the future.



Figure 11: Sample of the chiller coolant solution used by Lockheed Martin Corp, some of which was accidently discharged into the sewer on 2-27-15.

INDUSTRIAL WASTE SECTION SUMMARY OF ACTIVITIES FOR THE MONTH OF MARCH 2015

TREATMENT PLANT/SEWER/OTHER INCIDENT INVESTIGATIONS

Long Beach WRP Elevated pH

On Friday, 3-13-15 at 0835 hours, Long Beach WRP TPO II Patrick Ryan called Supervising I.W. Inspector David Sanchez and reported that high pH wastewater was entering the plant. WRP operators noted the influent pH began rising at 0740 hours. The influent pH alarm, which sounds at pH=8.5, sounded at 0815 hours and the pH peaked shortly thereafter at pH=8.6. The influent pH had fallen slightly to 8.3 at the time of the notification call.

Senior I.W. Inspector Andy Woods led the investigation. Calls to Districts' sewer maintenance personnel and contractors determined the cause of the high pH incident was not sewer line crown spray or caustic addition activity. Influent pH levels returned to normal levels by 1100 hours. No industrial source for the incident was found. Inspections of the four likely industrial sources, including the California Dairies' facility in Artesia and a large potable water processing facility operated by the City of Long Beach, found no evidence that any was the source of the incident. There were no adverse effects on treatment plant operations or final effluent quality as a result of the incident.

JWPCP Oily Black Foam

On Saturday, 3-14-15 at 2200 hours, JWPCP Supervising TPO II Mark Mc Knight called Supervising I.W. Inspector David Sanchez and notified him operators were observing an unusual black foamy material fouling primary tank skimmers. Sanchez notified Senior Inspector Bill Barnum of the report. Barnum initiated an investigation by calling the JWPCP primary control room and responding to the plant.

The investigation did not reveal any industrial source for the incident. JWPCP operators contacted about the nature and possible cause of the solids/foam observed in the skimmer channels expressed varied opinions about the incident and its possible origins, ranging from it being due to normal plant skimmer flushing operations, to being caused by a discharge of centrate from the JWPCP solids processing area or from a discharge at an industrial source such as the Ralphs Grocery digester project in Compton. I.W. Inspector Shawn Cleaver inspected the Ralphs facility on 3-17-14, finding no evidence that any unusual operations or discharges had occurred on 3-14-15. Inspections at other possible industrial sources similarly failed to find any evidence that any was the source for this incident. JWPCP operators were encouraged to contact I.W. inspectors if there is a recurrence of the incident in hopes of better identifying and sourcing the material.

Ralphs Grocery Company 2201 Wilmington Ave. Compton, CA 90220 IW 13403 280,000 GPD

Oily Water Spill at Oil Operators in Signal Hill

At 1825 hours on Tuesday, 3-17-15, while conducting a routine inspection at an unattended oil production facility, Senior Industrial Waste Inspector Kent McIntosh observed oily wastewater overflowing a large industrial wastewater storage tank at Oil Operators, Inc. in the City of Signal Hill. The wastewater was observed to be overflowing the tank at a rate of 25-50 gpm. The spillage was being collected and contained in the spill containment area of the facility's tank farm.

Oil Operators Inc. 2550 Lewis Ave. Signal Hill, CA 90755 IW 14694 290,000 GPD



Figure 1: Photo taken at 1830 hours on 3-17-15 of the ongoing spill of oily wastewater from the "001 OVERFLOW TANK" at the Oil Operators facility in Signal Hill.

McIntosh immediately telephoned the company contact, Mr. Jim Stine, at 1841 hours. Stine was able to remotely shut off the influent wastewater flow into the tank to stop the spill. Stine arrived on- site at 1858 hours, just as the overflow/spill was ending. McIntosh conducted a follow-up inspection at the facility at 2025 hours, where he observed a vacuum truck removing the spilled wastewater from the containment area, which was estimated to have a total volume of about 500 gallons. The spilled wastewater and associated cleanup water was subsequently hauled to a nearby Oil Operators sister facility and used as reinjection water.

Further follow-up was conducted on 3-18-15 by Senior I.W. Inspector Andy Woods. The company claimed an internal investigation determined the tank overflow was caused by a chemical vendor that had visited the site on 3-17-15 at approximately 1800 hours. The vendor closed a surge tank effluent valve to temporarily isolate and check an unused injection port. After finishing this work, the vendor forgot to re-open the effluent valve. Rising water in the surge tank then overflowed into the first overflow tank where a high-water sensor subsequently failed due to oily-scum buildup impeding the sensor's signal. The first overflow tank then began surcharging through a roof port into the containment area below because the pipe between the two overflow tanks has a smaller diameter than the influent pipe. Shortly thereafter, Inspector McIntosh fortuitously discovered the overflowing tank. McIntosh was able to notify the company of the situation before the containment area filled, thus preventing a possible overflow of the wastewater into the adjacent storm drain system. None of the spilled wastewater and cleanup water was discharged to the sewer. The incident didn't impact Districts' sewer lines or downstream treatment plant operations. The high level tank sensor that had failed on 3-17-15 was cleaned, tested, and found to be working properly on 3-18-15. The containment area high level alarm was also tested and found to be working properly.

Referral of Equipment Failure at Los Altos Car Wash in Long Beach

On Wednesday, 3-18-15 at 0925 hours, Industrial Waste Section Customer Service Representative Bianca Najera was notified by Long Beach Water Department, via e-mail, of possible discharge of car wash waste water through a broken (cracked) clarifier. The City of Long Beach Water Department email was sent by Civil Engineering Associate Dennis Santos.

Los Altos Carwash 5740 Stearns St. Long Beach, CA 90815 FID 9248867

I.W. Inspector Sanjay Patel was notified by Najera of the information and investigated. He inspected the facility on 3-19-15 and found no evidence that the wastewater clarifier, located in the tunnel of this automatic carwash operation, was broken, cracked, or malfunctioning. The clarifier appeared well-maintained and the facility contact claimed it was being serviced

2-3 times per year. The facility was determined to be permit exempt per current Districts' I.W. permitting policy guidelines. No further action on this referral is anticipated.

Referral of Low pH Discharge at Somar Corp in Gardena

On Thursday, 3-26-15 at 1400 hours, Supervising I.W. Inspector David Sanchez was contacted by Los Angeles County Department of Public Works Waste Control Engineering Inspector Walter Glowack. Glowack reported he had found low pH (\leq 2) wastewater in the clarifier of Somar Corporation in Gardena during his inspection at the facility during the afternoon of 3-19-15. He also said he observed a "trash bag" stuffed into the pipe between the third stage of the clarifier and the sample box. He further indicated there was no discharge to the sewer through the clarifier and sample box when he had made his observations.

Somar Corporation 13618 S. Western Ave. Gardena, CA 90249 IW 10916 430 GPD

Supervising I.W. Inspector David Sanchez conducted a follow-up inspection of the facility on 3-26-15. The facility is a small shop that manufactures aluminum clipboards, binders, and boxes. Products are manufactured from rolls of aluminum that are cut and shaped, anodized, and assembled. Sulfuric acid anodizing and etching are performed. Sanchez confirmed the wastewater in the clarifier had a pH less than 2.0. However, he also noted the level of the wastewater was about 1.5 feet below the level at which discharge would occur to the sewer, indicating none of the low pH wastewater may have been actually discharged to the sewer. The pH of the wastewater in the sample box downstream of the clarifier was 7. Sanchez advised the company contact, Mr. Martin Torres that the wastewater in the clarifier should be removed and neutralized, and then either hauled off-site for disposal or discharged to the sewer through the clarifier. Torres stated he did not know how the low pH wastewater had gotten into the clarifier without first being neutralized, but he would follow Sanchez' advice on its treatment and disposition.

A follow-up site inspection at the facility on 3-27-15 by area I.W. Inspector Chris Mendoza found the low pH wastewater had been removed into above ground tanks and drums, and was in the process of being neutralized prior to being discharged back into the clarifier in accordance with all permit requirements. No further follow-up on this incident is anticipated.

INDUSTRIAL WASTE SECTION SUMMARY OF ACTIVITIES FOR THE MONTH OF APRIL 2015

TREATMENT PLANT/SEWER/OTHER INCIDENT INVESTIGATIONS

Peck Road Pumping Plant Elevated Flow

On Wednesday, 4-1-15 at 1130 hours, Long Beach Main Pumping Plant Operator Carlos Moreno notified Supervising I.W. Inspector John Boyd that remote monitoring systems were showing larger than normal volumes of flow at the Peck Road Pump Plant in El Monte. Moreno stated that the discharge pumps at the "fill and draw" plant, which normally run for approximately 5-minute intervals, were running for 30 to 40 minutes intervals and had been doing so since the early morning hours on 4-1-15. Subsequent information obtained by Supervising I.W. Inspector Dave Lee in a follow-up conversation with Moreno indicated that elevated flows at the pump plant started on Friday, 3-27-15 and had been off and on for the past 5 days. I.W. Inspectors Steve Wittmer, Nguyen Dang, Jonathon Powell and Senior I.W. Inspector Steve Sealy reported to the pump plant to investigate.

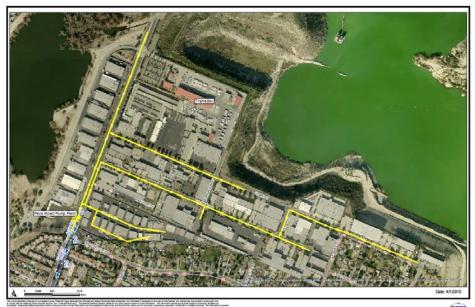


Figure 1: GIS diagram showing the location of the Peck Road Pumping Plant in El Monte, area sewers, and the source of the high flows reported on 4-1-15, Transdev.

A multi-day investigation by I.W. Inspectors Steve Wittmer, Nguyen Dang, Jonathon Powell and Senior I.W. Inspector Steve Sealy determined that the high flows were being caused by a malfunctioning bus washing system about 0.5 mile upstream of the pump plant at Transdev, the municipal bus line formerly known as the Foothill Transit Authority that is currently exempt from being required to obtain an industrial wastewater discharge permit as a bus washing operation discharging less than 1 million gallons of wastewater per year. The high flows were traced upstream from the pump plant to a local line manhole downstream of the Transdev facility. Inspection of the operations at the bus wash identified a malfunctioning level sensor in the wash water recycling system which was causing a continuous discharge to the sewer. Repairs to the sensor resulted in sewer flows into the pump plant immediately returning to normal as confirmed by Districts' Pumping Plant Operator Gilbert Madrid, who when contacted on 4-9-15, stated pump plant telemetry data appeared normal. A notice of violation was not issued to Transdev for the incident.

Transdev 5640 Peck Road Arcadia, CA, 91006 FID 9248895

1500 gpd

American Tire Depot Anonymous Tip in Santa Clarita

On Wednesday, 4-1-15, I.W. Section Engineer David Sonboli received a telephone call from an anonymous tipster who reported that American Tire Depot Company, located at 25150 Rye Canyon in the City of Valencia, had been dumping oil and grease and "other unknown substances" down their drain. Sonboli forwarded this information to Supervising I.W. Inspector John Boyd, who in turn forwarded it to Supervising I.W. Inspector Dave Lee for follow-up and investigation.

American Tire Depot 25158 Rye Canyon Road Valencia CA, 91355 FID 9248888 0 GPD

Area I.W. Inspector Anie Kellzi inspected the American Tire Depot facility at 1030 hours on Monday, 4-6-15. She found no evidence indicating any illegal or illicit discharges had been made to either the sewer or the storm drain as described by the anonymous tipster. Districts' I.W. Inspectors will follow-up at the site if further reports are received.

Lancaster WRP Black Color

On Wednesday, 4-8-15 at 0855 hours, Lancaster WRP TPO I Karen Neely called Supervising I.W. Inspector John Boyd and reported that the WRP primary tanks were a dark black color. She said the material that was causing the black color had likely come from a load received earlier that morning at the liquid waste disposal station (LWDS) station at the WRP. She said LWDS Attendant Ben Large had a sample of the material taken from the load. Boyd advised Neely to collect a sample from the primary tanks as well that could be potentially compared to the sample from the LWDS load to verify the material causing the color was the same. At the time of Neely's call to Boyd the material causing the color had yet to enter the secondary tanks so it was unknown if the secondary treatment process would be detrimentally affected by the material.

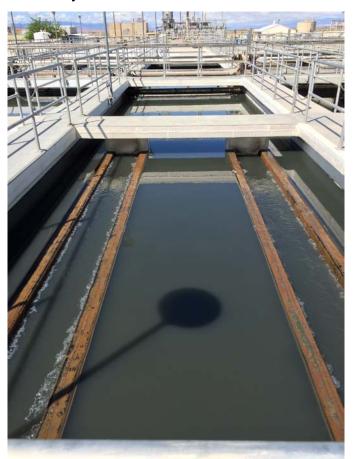


Figure 2: 4-8-15 photo of a primary tank at Lancaster WRP. Note the dark color present.

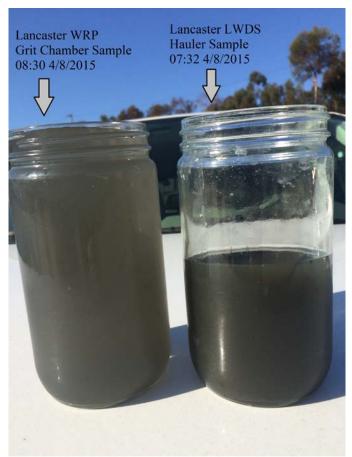


Figure 3: 4-8-15 photo comparing the color and appearance of samples taken from the grit chamber of the Lancaster WRP and from a load of septage dumped at the Lancaster LWDS immediately upstream of the WRP.

An investigation by area I.W. Inspector Jonathon Powell concluded that the black color reported in the grit chambers at 0830 hours on 4/8/2015 was most likely caused by a dark-colored load of septic tank waste received at Lancaster LWDS earlier in the day at 0732 hours. Samples were collected from the grit chamber and the LWDS for comparison, revealing a close match. The exact nature of the dark material is unknown, but it did not pass through into secondary treatment tanks and WRP secondary treatment operations were not impacted. No final effluent exceedances resulted from the incident. No further investigation is anticipated.

Coyote Creek Positive Chlorine Residual Concentration

On Friday, 4-10-15 at 1300 hours, Carlita Barton, Districts' Supervising Biologist, notified Supervising I.W. Inspector David Sanchez of a positive residual chlorine concentration found in the Coyote Creek, upstream of the Long Beach WRP final effluent discharge. Senior Biologist Misty Brown reported that on 4-10-15 Laboratory Technicians Hector de Haro and Ashley Choate detected a positive residual chlorine concentration at monitoring station Long Beach-RA1 (RSW-001), located upstream of the Long Beach WRP outfall into Coyote Creek during a routine bioassay sampling event. The residual chlorine was measured as 0.11 mg/L at 1140 hours. A confirmatory sample was analyzed immediately following the detection and the concentration was 0.13 mg/L. A third sample at the same location was collected at 1155 hours with the residual chlorine concentration measured at 0.12 mg/L. A fourth and final sample was collected at 1205 hours and the chlorine residual was less found to be 0.08 mg/L. The receiving water sample location LB-RA1B, located 100 feet downstream of the LBWRP outfall, was sampled at 1123 hours with the residual chlorine concentration found to be below the detection limit of 0.05 mg/L. The LBWRP was discharging into the river at the time of collection. Lab technicians were unable to identify a source for the positive residual chlorine results. There were no fish, alive or dead, observed along Coyote Creek, and no algal bleaching was observed. No biological impacts were observed.

On Monday, 4-27-15 at 1045 hours, Misty Brown sent an email to I.W. Inspectors, including Supervising I.W. Inspectors John Boyd and David Sanchez, reporting that positive residual chlorine concentrations had again been detected just upstream of the Long Beach WRP outfall in Coyote Creek. Specifically, she reported that on Monday, 4-27-15, Districts' Laboratory Technicians Jojo Loan and Lauren Parrish had detected residual chlorine at monitoring station Long Beach-RA1 (RSW-001), located upstream of the LBWRP outfall. The residual chlorine was measured at 0.16 mg/L at 1012 hours. A confirmatory sample was analyzed immediately following the detection and the residual chlorine was 0.16 mg/L. A third river sample was collected at 1022 hours at the same monitoring location and the residual chlorine was 0.17 mg/L. It was noted that LBWRP was not discharging into the creek at the time of these samples were taken. Once again, laboratory technicians were unable to identify any source for the chlorine. They observed no fish, alive or dead, along the creek, and no algal bleaching was observed. No biological impacts were observed.



Figure 4: Annotated Google maps satellite photo showing the Long Beach WRP and adjacent City of Long Beach operated Vander Lans water recycling plant. Note the unlabeled large red-outlined area which indicates the area where a large pond of chlorinated water was found in July 2011. This water was sourced to a broken underground 18" line carrying water to be reused from the Long Beach WRP to Long Beach Water Reclamation Districts' facilities. Note that no evidence of a similar line failure was found during this incident.

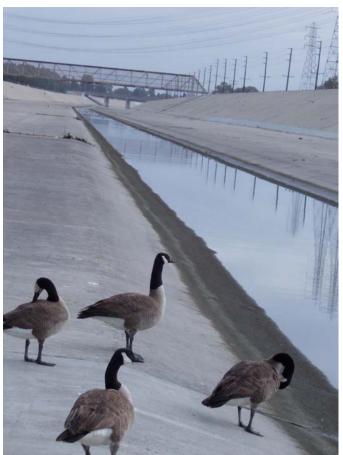


Figure 5: 4-27-15 photo looking north of Coyote Creek just north of the RA1 monitoring/sampling location.

Senior I.W. Inspector Andy Woods led investigations of these reports on 4-13-15 and 4-27-15. I.W. Inspectors participating in the investigation were Sanjay Patel and Traci Stahl. Field testing by the inspectors in both cases found no positive residual chlorine concentrations present when they arrived onsite at RA1. Because of this, inspectors were unable to trace anything upstream to a source. Ultimately no source(s) for the incidents were identified. The investigations also found no evidence of a repeat of the 7-11-2011 Long Beach Water Reclamation District broken line incident that resulted in similar positive residual chlorine concentrations being detected in the waters of Coyote Creek. Inspectors also followed-up on a statement made during the investigation by a supervisor at the nearby Los Angeles County El Dorado Regional Park regarding a fuel spill the previous week on the adjacent 605 freeway that he thought might be related to this incident. The investigation found no evidence of a connection between the two. I.W. Inspectors will remain vigilant to possible sources of chlorine residual discharges into the storm drain upstream of the RA1 monitoring/sampling location. Possible sources include both industrial and residential operations such as vehicle/equipment cleaning and swimming pool discharges.

Irwindale Relief Trunk Scale/Solids

On Monday, 4-13-15 at 0715 hours, Districts' Supervisor of Sewer Maintenance at the San Gabriel Yard Bill Balas called Supervising I.W. Inspector John Boyd and reported that one of his sewer maintenance crews had encountered a large chunk of solid material adhering to the wall of the sewer at Manhole 22 1214A on the Irwindale Relief Trunk on the afternoon of Friday, 4-10-15. The crew had been attempting to clean the line by hydrojetting it, but was unable to remove or dislodge the chunk. Being concerned that the material was possibly large enough to cause a blockage downstream if it broke free in one piece, the crew ceased trying to remove it on 4-10-15, opting to notify I.W. Inspectors and then return on Monday, 4-13-15 to try again. Balas said the crew would attempt to obtain a piece of the material I.W. Inspectors could use to investigate the material and its origin. Supervising I.W. Inspector Dave Lee was informed of the situation and coordinated I.W. Inspectors meeting the sewer maintenance crew on-site at the manhole at 0800 hours on 4-13-15.

I.W. Inspectors Peter Carlstrom, Nguyen Dang and Senior Inspector Steve Sealy met with sewer maintenance crew lead Robert Benevides at MH 22 1214A at 0830 hours on 4-13-15. Benevides showed inspectors the large scale chunk in the sewer at the connection of the Davis Wire sewer line to the Districts' trunk (see Figures 7 and 8 below). The scaling material was found in the eddy area of the connection of the 2 sewers and trails back up into the Davis Wire connection. It was confirmed there was no scaling present in the trunk downstream of MH 22-1214A.

The investigation inspection at Davis Wire found heavy scaling in the company's flow metering weir box (see Figure 9) and other locations in the company's discharge line. The scale was analyzed and determined to be calcium sulfate which chemically matched that of a chunk of the material removed from MH 22 1214A. Davis Wire contact Nancy Felix agreed that the scaling found in the trunk is from her company. She was instructed to clean the sewer on their property as soon as possible to prevent further scaling in the Districts' trunk downstream. A verbal warning was issued to the company for causing the incident. The calcium source is from the company's use of lime slurry (calcium carbonate) for industrial wastewater pH neutralization. A possible solution to this issue may be switching the neutralization solution used at Davis Wire's pretreatment system from lime slurry to sodium hydroxide.

Davis Wire Corporation 5555 Irwindale Avenue Irwindale, CA, 91706

IW#6864 28,535 GPD

Per a 5-1-15 email from Felix, the company contracted with Pro Pipe Professional Pipe Services to clean the site discharge sewer pipe. There have been no reports of any further issues in the Irwindale Avenue Relief Trunk since the 4-13-15 incident.



Figure 6: GIS diagram showing the location of manhole 22 1214A where calcium sulfate scale was found.

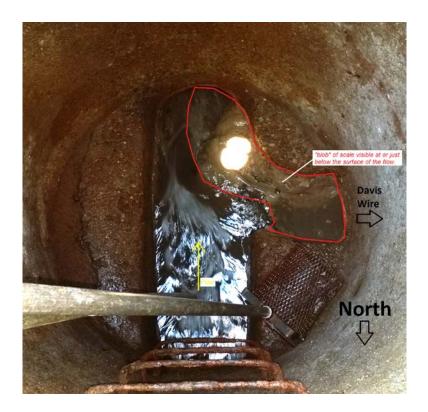


Figure 7: White or grey scale in MH 22 1214A on 4-13-15.



Figure 8: Piece of the scale removed from MH 2214A on 4-13-15. Note the layered appearance indicating it likely built up over a period of time.

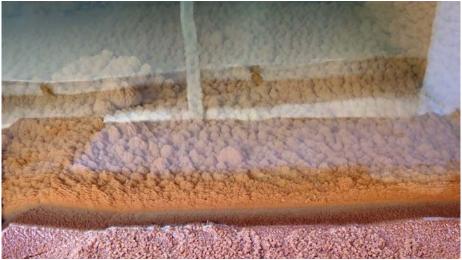


Figure 9: Calcium sulfate scale in the weir box at Davis Wire on 4-13-15.

Water Street Trunk Liner and Adhesive Finding

On Friday, 4-24-15 at 0815 hours, Rick Pearce, Supervisor of Sewer Maintenance at the Compton Field Office, notified Supervising I.W. Inspector David Sanchez of liner material and adhesive found in the Districts' Water Street Trunk at Manhole 03 0427. The liner and epoxy adhesive was found during cleaning of the line on 4-16-15. It was noted the line had not been cleaned in approximately 6 years.



Figure 10: GIS photo of the Water Street trunk in Long Beach. The trunk is located just east of Piers B and C in the port area. Note the location of Manhole 03 0427 at the top of the diagram.



Figure 11: 4-27-15 photo of the interior of manhole 03 0427 on the Water Street trunk in Long Beach. Note the orange tint of the epoxy liner.



Figure 12: Photo of liner material, epoxy resin and dark solids removed from Manhole 03 0427 on the Water Street trunk on 4-16-15. Note the orange color of the liner that matches that in Figure 11 above.

Area Inspector Sanjay Patel and Senior I.W. Inspector Andrew Woods inspected MH 03 0427 on Monday, 4-27-15 and observed epoxy resin and liner material on the sides of the manhole riser that matched a photograph of the material removed from the manhole taken by sewer maintenance workers at the Compton Field Office (see Figure 11 above). Patel and Woods concluded it was very likely the liner and epoxy resin adhesive fell off from the manhole shaft.

The other solid debris found may have solidified over time in the sewer due to its not having been cleaned for several years.

Pomona WRP Elevated pH

On Friday, 4-17-15 at 0835 hours, Pomona WRP STPO Mike Barker called Supervising I.W. Inspector John Boyd and reported that at 0814 hours operators had noticed white colored influent with a high pH (9.5) entering the WRP on the north line. He said the influent had no unusual odor. Two samples of the influent were taken by operators for possible pick up and analysis by I.W. Inspectors. Barker said he called Compton Field Office (CFO) personnel and was told there was no caustic addition activity scheduled upstream of Pomona WRP on 4-17-15. Boyd commented that the white color and high pH with no associated unusual odors was not indicative of caustic addition as much as crown spray activity. When asked, Barker indicated that he hadn't asked about crown spray activity in the area. North Team Supervising I.W. Inspector Dave Lee was notified of the report. Lee and Boyd concurred the obvious potential source was crown spraying activity and Lee said he would investigate the report.

Lee's investigation revealed that the cause of the incident was routine crown spray activity on 10 reaches of the San Antonio trunk sewer upstream of the WRP by a Districts' contractor. The activity began at 0700 hours on 4-17-15 and was scheduled to be completed by 1000 hours. The line flows into the north influent line of the Pomona WRP. At 0900 hours on 4-17-15 Pomona WRP STPO Michael Barker was notified of the finding and said he will request he be added to the crown spray activity schedule email distribution list so that he can be aware of these activities in the future.

Los Coyotes Green Color

On Tuesday, 4-28-15 at 0625 hours, Los Coyotes WRP TPO 2 Will Moriarty, notified Supervising I.W. Inspector David Sanchez of green colored wastewater in the forebay of the WRP. The color was noticed "at first light."

An investigation of the report was led by Senior I.W. Inspector Andy Woods and included I.W. Inspectors Jason Finn, Steven Lajkowicz, and Sanjay Patel. Their inspections found no definitive source for the color despite the 6 most likely industrial sources being inspected immediately following the report. Two written notices of violation and two verbal warnings were issued during these inspections: Tri- Star Dyeing and Finishing in Santa Fe Springs, a large textile dyeing operation, was cited for discharging highly colored (red) wastewater but there was no evidence found that they had discharged highly green colored wastewater; Miller Castings, a metal parts casting operation in Santa Fe Springs, was cited for failing to provide timely access. However, the inspector was still able to sample their discharge and found that although it was green-colored due to the use of fluorescein dye for testing parts with a penetrant solution, subsequent HPLC testing comparing that color to that in the WRP water did not find a match. I.W. Inspectors will continue to be alert to new possible sources for this incident as the green color reported is unusual compared to the red, brown, and tea colors that have typically been reported by LCWRP operators over the past 10+ years. The incident did not result in an NPDES violation.

INDUSTRIAL WASTE SECTION SUMMARY OF ACTIVITIES FOR THE MONTH OF MAY 2015

TREATMENT PLANT/SEWER/OTHER INCIDENT INVESTIGATIONS

High Flows in Santa Fe Springs Local Sewer

On Monday, 5-4-15 at 1110 hours, Districts' Industrial Waste Section Monitoring Crew Technician Jose Quero notified Supervising I.W. Inspector David Sanchez of possible high flows in the local sewer line on Marquardt Avenue in Santa Fe Springs just outside of Tri-Star Dyeing and Finishing (IW#17196), a large textile dyeing operation. Quero was notified by Tri-Star personnel that the company was not discharging to the sewer due to surcharging conditions noticed at their industrial waste sample point (flume) and downstream local sewer manhole. Company operators suspected the surcharging was being caused by a complete or partial blockage in the downstream sewer line. Tri-Star personnel escorted Jose Quero to a local sewer manhole and opened it to show him the high level of sewage in the line. Per Quero, Tri-Star was not discharging in response to their discovery to prevent a spill occurring.

Tri-Star Dyeing and Finishing 15125 Marquardt Avenue Santa Fe Springs CA, 90670 IW 17196 395,000 GPD

Senior I.W. Inspector Andy Woods, I.W. Inspector Jason Finn, and Tom Hall, Deputy Director of Environmental Services for the City of Santa Fe Springs, all responded to the facility on 5-4-15. Investigators confirmed higher than normal sewage levels in several local line manholes downstream of Tri-Star's I.W. lateral connection point to the city sewer line. A city sewer maintenance crew immediately cleaned the local line, resolving the surcharging condition. However, they said they were unable to definitively identify a cause for the surcharging. Sanchez and Finn re-examined the local line on 5-6-15, finding no evidence of any surcharging conditions or obstructions.

Increase in Number of LWDS Loads Received from Santa Susana Boeing Facility

On Tuesday, 5-12-15 at 0815 hours, Carson Liquid Waste Disposal Station Attendant Bob Smith notified Supervising I.W. Inspector David Sanchez of an unusual increase in the frequency of sanitary waste loads being delivered to the LWDS from the Boeing (formerly Rocketdyne) research facility in Santa Susana by contract hauler Southwest Processors. Smith stated that the frequency of 5,000-gallon loads brought to the Carson LWDS from the facility had increased from about one per month to one to two per week. Smith said the wastewater appeared to be septic waste as claimed on the waste manifests but that it did appear somewhat watered down. The Santa Susana facility was the site of both rocket engine and nuclear reactor research. It is now an EPA superfund site due the need to clean-up and remediate rocket fuel and radiation contamination left over at the facility. Due to the potential for contaminated wastes to be illicitly delivered to the LWDS from this site, I.W. inspection supervisors determined it was necessary to investigate Smith's report.

A field inspection was conducted at the Santa Susana Field Laboratory (SSFL) by Senior I.W. Inspector Bill Barnum on 5-27-15. SSFL is a former rocket testing and nuclear energy research facility that is a current Superfund site owned by Boeing and NASA with surface soil and groundwater remediation conducted by Boeing, NASA and the Department of Energy. The inspection confirmed the source of the "septic tank" waste hauled to the JWPCP LWDS is from a decommissioned "pocket" sanitary wastewater treatment plant. According to Boeing Facilities Manager Bill Gruener the septic tank is connected to existing office structures and temporary

office trailers by a sanitary sewer. There are no connections from stormwater or groundwater remediation according to Gruener. When Barnum suggested that the amount of waste generated every week seems excessive for the number of employees using the facility, Gruener said their plumber uses a significant amount of potable water for flushing the sanitary sewer to prevent septic conditions in the sewer and to move solids down the lines. The company supplied hauling records for septic tank loads which matched the Districts' LWDS records for Southwest Processors, the contracted hauler. The company also stated they have requested their plumber keep records of potable water that is added to their sewerage facilities and have requested he repair the influent flow meter to the septic tank. Southwest Processors managers stated that the reason for the increase in loads being delivered to the Carson LWDS was that previously most of these loads were hauled to a facility in Ventura County. That facility is currently no longer accepting any wastes following an explosion on 11-18-14 and subsequent ongoing criminal investigation of waste handling practices at the facility. No evidence was found of any non-domestic waste being hauled to the Carson LWDS from the SSFL. Barnum collected a sample from a Southwest Processor's truck on 6-2-15 from a purported load of Boeing septic tank waste from the SSFL and submitted the sample for metals, TTO and pesticide analysis. Further investigation may be warranted if the analyses determine unusual or significant pollutants of concern.



Figure 1: 5-27-15 photo of the old pocket wastewater treatment plant at the Santa Susana facility that now functions as a septic waste collection tank.

Florence Avenue Trunk Viscous Material

On Wednesday, 5-20-15 at 1045 hours, Districts' Supervising Engineering Technician Albert Steele of the Compton Field Office (CFO) notified Senior I.W. Inspector Bill Barnum of observed highly viscous material limiting flow and contributing to surcharge conditions in the 18" diameter Florence Avenue trunk sewer at MH 18 1083 in Santa Fe Springs. The Districts' contract supplier of sodium hydroxide was dosing at this manhole location when the driver observed the viscous material contributing to the surcharge condition. The driver was successful at discharging the dose of 3,450 gallons of calcium hydroxide solution, which has been recently substituted at this location for sodium hydroxide in a test to see if it is more effective. Sewage or other material did not surcharge to the surface. A sample of the viscous material floating on the surface was collected by the driver.



Figure 2: GIS diagram indicating the area where the 19" Florence Avenue trunk line surcharging occurred on 5-20-15.



Figure 3: 5-20-15 photo of MH 18 1083.

Area I.W. Inspector Jason Finn and Senior I.W. Inspector Bill Barnum participated in this investigation. The sample collected by the driver was examined by Laboratory Supervisor Steve Carr. Analysis of the floating black gooey material collected by the driver indicated it did not contain petroleum oil as was initially suspected. The material had a fibrous consistency and was dark in color. Carr stated that the fibrous material is commonly seen in samples collected from the Districts' collection system and is essentially bio growth. A sample of the grey and white gritty solid material that was sitting in the bottom of the line at MH 18 1083 was also analyzed. This material reacted with hydrochloric acid in an effervescent manner, indicating it was a calcium or magnesium carbonate material. When Carr was informed that calcium hydroxide was used as a treatment chemical at the manhole, he said he believed what was occurring is the calcium hydroxide is acting as a precipitating agent, causing excessive calcium

carbonate (CaCO3) solids to precipitate out of solution with other material already present in the line, thus causing the floating viscous material and carbonate particulates observed at the manhole. 5-22-15 inspection of the trunk sewer upstream of MH 18 1083 by Supervising I.W. Inspector David Sanchez found no evidence of any solid or viscous material similar to that found at MH 18 1083, indicating no upstream source for the material.

Results of the metals test analysis of the solids revealed that it is primarily calcium carbonate based on a calcium result of 111,000 mg/kg. It is believed that the weekly dosing of calcium hydroxide solution caused CaCO₃ to buildup, this combined with the slow velocity in the line, gradually resulted in partial line obstruction and the observed surcharging to occur.

Los Coyotes WRP Yellow Color

On Thursday, 5-28-15 at 1055 hours, Los Coyotes WRP TPO II Will Moriarty notified Supervising I.W. Inspector David Sanchez of yellow colored wastewater in final effluent forebay. The color was noticed at about 1030 hours. With the 10-hour retention time in the plant, it was estimated the colored material may have entered the plant at about midnight on 5-27-15.

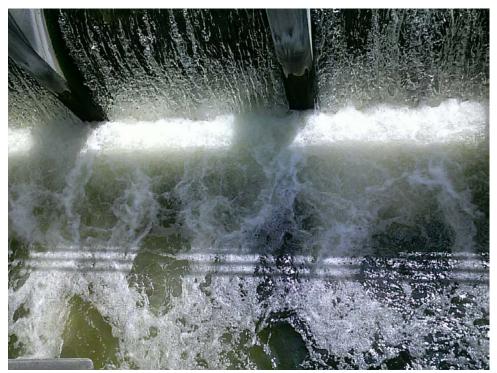


Figure 4: LCWRP effluent at the forebay at 1140 hours on 5-28-15.

Senior I.W. Inspector Andy Woods led the investigation, with participation from I.W. Inspectors Jason Finn, Sanjay Patel, and night team Senior I.W. Inspector Kent McIntosh. All major known suspect industrial color sources tributary to the WRP were inspected. Large textile dyeing and processing facility Tri-Star Dyeing & Finishing was inspected during both day and night shifts on 5-28-15. The company's color log documented "light yellow" wastewater at 0030 hours and "light yellow" again from 0430 to 0630 hours. Inspectors reported the company's effluent passed dilution limit tests. Despite the log information, there was no hard evidence, such as wastewater samples or direct observation, that the company was the source of the incident and the company was not cited for such. Other potential color dischargers inspected included carpet manufacturer Diversified Services Inc. several Shaw and chemical and manufacturers/suppliers. No source was definitively identified for this incident. However, I.W. inspectors believe Tri-Star Dyeing & Finishing is the most likely source. The company has a recent enforcement history of color violations, and their wastewater treatment is labor intensive,

requiring close constant supervision. Should color problems at LCWRP persist, surveillance sampling at Tri-Star will be requested.

It was also noted that when samples of the yellow color in the final effluent were extracted using methanol, the color changed to green (see Figure 5 below), indicating investigators may need to search for industrial sources with green-colored discharge if a similar yellow color is observed at the WRP in the future. Inspectors are also working to develop a library of colors from dye companies to assess and investigate future similar incidents. According to the WRP operators, there were no adverse effects on treatment plant operations and no NPDES violations occurred due to this incident.

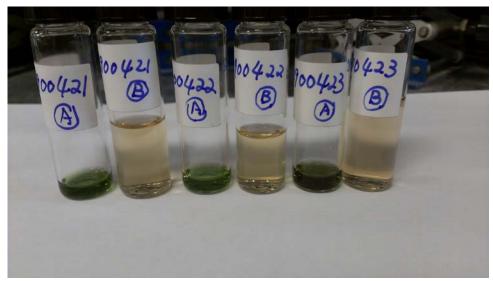


Figure 5: Methanol eluents A and B for 3 LCWRP yellow colored effluent samples.

INDUSTRIAL WASTE SECTION SUMMARY OF ACTIVITIES FOR THE MONTH OF JUNE 2015

TREATMENT PLANT/SEWER/OTHER INCIDENT INVESTIGATIONS

Elevated Explosivity on J.O. 'A' Unit 3A at Manhole (MH) 08A0010 in Carson

On Monday, 6-1-15 at 1309 hours, Albert Steele, Supervising Engineering Technician at the Compton Field Office telephoned Supervising I.W. Inspector John Boyd and reported that at 1300 hours technicians had detected 60% LEL at MH 08A0010 on the J.O. 'A' unit 3A 114" trunk sewer in Carson just upstream of JWPCP. Senior I.W. Inspector Bill Barnum responded to the report.

Barnum confirmed LEL=55% in the headspace of MH 08A0010 at 1340 hours on 6-1-15. He also noted there were no other unusual visual conditions or odors, including gasoline or petroleum- like, present in the manhole headspace. A check of the downstream J.O. 'A' headworks at JWPCP found only 2% LEL at 1350 hours and no unusual LEL trends all day for the gas monitors that record LEL concentrations continuously at the headworks. Analysis of headspace gas samples for previous similar incidents reported at MH 08A0010 have consistently found the explosive gases to be comprised of only methane. This indicates the likely source for the gas is anaerobic biodegradation of raw sewage solids in the line as opposed to from an industrial source, such as an upstream petroleum refinery. There was no evidence found that the incident was attributable to anything other than methane accumulating in the sewer from biological activity. No further investigation was conducted, but inspectors remain vigilant to these elevated LEL conditions and reports.

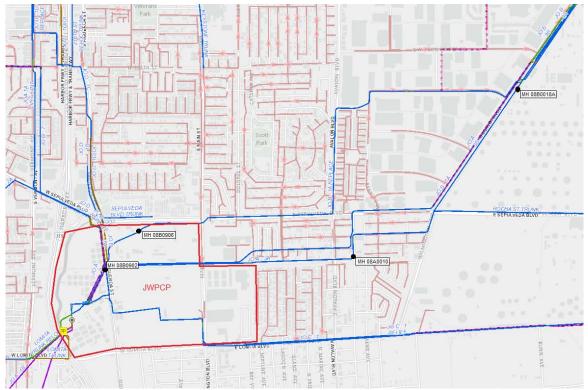


Figure 1: Map diagram showing JWPCP and the four manholes most frequently reported to I.W. Section staff as having elevated explosivity concentrations as monitored by Compton Field Office sewer maintenance personnel.

For many years the I.W. inspection staff has been receiving periodic reports of elevated LEL at the headspace of MHs 08A0010, 08B0902, 08B906, and 08B0018A from Districts' Compton Field Office (CFO) sewer maintenance personnel. Historically, there were 6-20 such reports per year for each of the four manholes with the reported LEL ranging from 20%-100% (2012-2014). However, in mid-2014 the CFO altered the criteria used to decide when to report

to I.W. Section staff an elevated manhole headspace LEL at manholes that have frequent elevated readings. The threshold changed from 20% to 50%, in recognition of the fact that years of investigations into these reports by I.W. Section staff had found little or no correlation between any industrial wastewater discharge violations or unusual conditions at potential upstream industrial source(s). The sources had been previously assumed to be the most likely source of the elevated LEL readings. However, long term investigations by I.W. inspectors revealed the cause of the elevated level readings was almost always the presence of methane generated "naturally" by anaerobic degradation of raw sewage in the sewer lines combined with other conditions in the lines, such as ongoing sewer maintenance activity, high flows (during rain or other events), excessive turbulence, or the presence of sewer structures such as siphon structures and reverse grade sewers that tend to trap headspace gases. Given this, reports of elevated LEL at MH 08A0010 and the other manholes shown on the Figure 1 diagram above, especially when the LEL is at or below 50%, will not necessarily result in any further investigation by I.W. inspectors at this time, although the information is still being forwarded to I.W. inspectors so that they are aware of it.

Search Warrant Issuance at Starlite Reclamation in Fontana

On Thursday, 6-4-15 at 0645 hours, Supervising I.W. Inspector Dave Lee, along with Senior I.W. Inspector Steve Sealy and I.W. Inspector James McCurdy, participated in a search warrant issuance at Starlight Reclamation Environmental Services, Inc. in Fontana, CA. The search warrant issuance was led by Federal EPA criminal investigators. Other participants included Inland Empire Utilities Agency (IEUA) source control inspectors led by Supervisor Craig Proctor. The search warrant was issued as the result of many months of illicit acidic industrial wastewater discharges documented at the facility by IEUA automatic sewer monitoring equipment. Starlite Reclamation is a liquid waste hauling and disposal business that in 2013 opened a non-hazardous liquid waste treatment and disposal operation at their yard in Fontana. The facility is required to comply with all applicable local, state, and federal environmental regulations. The company was discharging their industrial wastewater into a local sewer that ultimately flowed into the IEUA line that flows to the Sanitation Districts collection system via a connection at the border of Los Angeles and San Bernardino Counties at a location on, known as, the "East End MH" due to its location near the intersection of Grand Avenue and East End Avenue in Pomona. The Sanitation Districts and IEUA have a long-term contract which allows this to occur and also facilitates the issuing of joint IEUA/LACSD industrial wastewater discharge permits to industrial facilities in the IEUA service area that discharge into this line.

Starlite Reclamation Environmental Services, Inc. IW 21357 21600 GPD

11225 Mulberry Avenue

Fontana CA, 92337

At the time of the search warrant issuance at 0730 hours the company was found to be actively discharging pH=2.5 acidic wastewater into the sewer. The company's Vice President of Operations & Environmental Technology was subsequently interviewed and placed under arrest by EPA investigators. The case is currently being prosecuted by the U.S. Attorney's office.

On Wednesday, 6-17-15 Districts' and IEUA I.W. Inspectors met with IEUA sewer maintenance personnel at the local sewer connection manhole utilized by Starlite Reclamation for the discharge of industrial wastewater. As a result of the previous violations and the violations noted during the search warrant issuance, the company's I.W. permit was revoked and their connection to the sewer was sealed. As a result, the company is currently no longer discharging industrial wastewater to the sewer.



Figure 2: IEUA sewer maintenance personnel preparing to enter the manhole where they sealed the I.W. connection line from Starlite Reclamation Environmental Services, Inc. on 6-17-15.



Figure 3: 8" diameter sewer line expansion plug installed by IEUA on 6-17-15 which effectively sealed Starlite Reclamation's I.W. connection.

Hot Oily Flow on J.O. 'C' Unit 3E at MH 03C0611 in Long Beach

On Monday, 6-8-15 at 0830 hours, Supervising Engineer John Chung of the Compton Field Office called Supervising I.W. Inspector John Boyd and reported that on Monday, 6-1-15 a Districts' CCTV crew had noted "hot, oily flow" in several reaches of the 33" J.O. 'C' 3E trunk sewer in Long Beach. The crew reported that from MHs C0611-C0414 there was a hot steamy condition throughout the line, accompanied by a petroleum odor present at the manhole risers. Crews described seeing a "slime coat over the mag coat" in the line as well. Boyd told Chung

that the condition observed was not unusual for lines downstream of oil field producing wastewater discharging facilities, of which there are many in the Signal Hill area. These facilities typically discharge very warm brine water into the sewers that does have a petroleum odor, despite a relatively low concentration of oil being present in the flow.

Senior I.W. Inspector Andy Woods and area I.W. Inspector Sanjay Patel investigated the report. Patel noted that Oil Operators Inc., a large volume discharger of oil field brine water is located upstream of the incident location. The typical industrial wastewater discharge flowrate from the Oil Operators Inc. facility is about 350 gpm with a peak rate of 560 gpm. This rate is consistent with the estimated rate of 600 gpm observed at MH 03C0611 by the CCTV crew. Oil Operators Inc., was inspected during day and evening shifts during the investigation. All operations were determined to be normal and in compliance with all requirements and discharge limits. Inspection field tests noted wastewater temperatures around 120°F, under the 140°F limit and typical for this facility. It was concluded that the conditions observed by the CCTV crew were essentially normal for this location and given the discharger responsible for the condition, Oil Operators Inc., was in compliance with all requirements and discharge limits, no further action was taken or is anticipated at this time.

Oil Operators Inc. IW 14693 & 14694 515,000 GPD (collectively)

2550 Lewis Avenue

Signal Hill CA, 90755

Elevated Explosivity on J.O. 'B' Unit 1A Replacement at MH 08B0906 in Carson

On Tuesday, 6-9-2015 at 1505 hours, Albert Steele, Supervising Engineering Technician at the Compton Field Office called Supervising I.W. Inspector John Boyd and reported that at 1335 hours, technicians had detected 50% LEL at MH 08B906 in the 10' wide x 12' high reinforced concrete J.O. 'B' replacement box trunk sewer in Carson upstream of JWPCP. No other unusual conditions or odors were noted.

Senior I.W. Inspectors Kent McIntosh and Bill Barnum investigated this report. As of July 1, 2015, Compton Yard technicians have notified Industrial Waste inspectors three times this year (5-13-15, 5-29-15, and 6-9-15) of an elevated LEL concentration ≥ 50% at MH 08B906. This manhole is typically checked by Compton technicians three times per week. In each incident, no other unusual conditions or odors were reported by Compton Yard. And no problems were reported at the downstream treatment plant, JWPCP. Inspection at possible upstream LEL sources, including multiple large oil refineries, found no evidence any was the source of the elevated LEL concentration. In fact, similar to the conclusion stated above for the high LEL concentration found at MH 08A0010 on 6-1-15, the high LEL concentration at MH B0906 on 6-9-15 is most likely attributable to methane accumulating in the sewer generated from biological activity in the line. The methane becomes trapped there due to the sewer configuration at MH 08B0906. No alarms or other problems occurred at JWPCP during this incident. Inspectors remain vigilant to these elevated LEL conditions and reports.

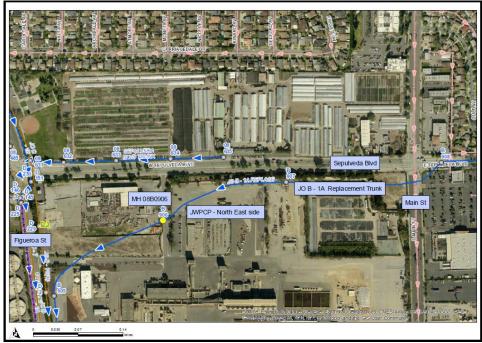


Figure 4: Map diagram showing the location of MH 08B0906.

<u>Heavy Siphon Greasing on J.O. 'A' 1A District 5 Interceptor</u>
On Thursday, 6-11-15 at 1212 hours, Compton Field Office Supervising Engineer John Chung sent an email to Supervising I.W. Engineer John Boyd reporting that the Districts' CCTV crew had encountered large amounts of grease in the J.O.'A' 1A District 5 Interceptor trunk sewer at MH 08A0470 in the Los Angeles city strip area just east of the city of Torrance. Chung reported the line in question was just completely cleaned about two months ago as part of the interceptor rehabilitation project. MH 08A0470 constitutes the upstream manhole of a siphon structure on the 66" diameter trunk with MH 08A0469 being the downstream siphon structure manhole.



Figure 5: Sewer line diagrams indicating the area upstream of MH 08A0470 where heavy greasing was found on 6-11-15 by a Districts' CCTV crew.



Figure 6: CCTV video screen grab photo of the FOG CCTV sewer crews encountered at MH 08A0470 on 6-11-15.



Figure 7: Sample of the FOG removed from MH 08A0470 on 6-12-15.

Senior I.W. Inspector Bill Barnum and area I.W. Inspector Michael Placencia investigated this report. On Friday, 6-12-15 Barnum telephoned Ramesh Patel, Senior Industrial

Waste Inspector with the Los Angeles Bureau of Sanitation (LABOS) to discuss any known FOG issues in the Harbor Gateway upstream of MH 08A0470. Mr. Patel said he was unaware of any hotspots in the area with regard to FOG but said he would pass on the concern to the City's Sewer Maintenance Section.

On Tuesday, 6-16-15, LABOS Wastewater Manager Robert Potter called Barnum. Potter said he was unaware of any unusual FOG issues on the two city sewers upstream of MH 08A470. He stated those two sewers are on normal preventative maintenance schedule for cleaning and according to his records there is no history of any sanitary sewer overflows in that area. He also stated the city cleans the sewers by hydrojetting upstream and vacuuming grease and solids from the downstream manhole to prevent the material from washing downstream into the District's sewers.

While there was accumulated grease observed at the siphon in question, the investigation did not identify any single source as being responsible for this FOG. Due to the installation of a stoplog at MH 08A0479, which diverted tributary flows upstream of this manhole into J.O. 'D' (which runs parallel along Normandie Avenue), the length of the contributing sewer was limited to 1.2 miles upstream from the siphon during the two months following the trunk sewer cleaning. Industrial users tributary to this reach of trunk sewer were inspected by Barnum and Placencia. Additionally, the conditions in manholes upstream of the affected siphon were also inspected. Despite the extremely low volume flow volumes observed in the trunk, which were as low as ~5 gpm, there was no observable accumulation or deposition of grease in any of these structures with the exception of the reported floating mass of grease immediately upstream of the MH A470-A469 siphon. The likely cause of the FOG accumulation found there is that the very low flowrate in the trunk allowed the previously insignificant grease contributions from restaurants and industrial users along this reach to accumulate at the siphon. Instead of this material being flushed through by previously-typical 60" trunk velocities, grease accumulated at the upstream side of the siphon.

BCE Dental Spa Tip in Cerritos

On Thursday, 6-18-15 at 1030 hours, I.W. Section Supervising Permit Engineer Larry Smith received a telephone call from Environmental Consultant Mr. Kevin Reeve of All West Environmental in Santa Ana. Reeve alleged that a dentist office located at 18000 Studebaker Road in Cerritos, CA was discharging untreated silver-laden dental x-ray film processing wastewater into a drain at the dental office. The caller also alleged that workers at the office were "chasing" the discharge down the drain with vinegar (acetic acid solution).

BCE Dental Spa FID 9249013 50 GPD

18000 Studebaker Road Suite 365

Cerritos CA, 90703

Area I.W. Inspector Traci Stahl investigated the tip. She did an initial inspection at the facility on 6-19-15 and a follow-up inspection on 6-24-15. She spoke with Dr. William Vickerman, DDS and confirmed the facility has a small x-ray film processing unit that is used periodically as a teaching tool in addition to their more modern digital film processing unit, which produces no industrial wastewater. Dr. Vickerman claimed he was aware that they are not allowed to discharge silver laden wastewater to the sewer. He claimed the concentrated silver laden waste, the waste fixer solution, which typically contains 90% of the waste silver from film processing operations, is hauled off-site for disposal though he could produce no proof of this. He did admit to sometimes discharging vinegar, along with baking soda, in order to prevent pipe clogs. Dr. Vickerman produced a small silver recovery system which had clearly never been used; it was new in the box. It came with instructions to run the solution through the system and send the spent cartridge to an environmental consultant in Florida for silver reclamation. Stahl emphasized that untreated fixer solution should not be discharged to the sewer and instructed the use of vinegar or acid solutions to clear pipe clogs shall cease. Dr. Vickerman said he would abide by these instructions. No further action was taken and Dr. Vickerman was not cited.

Vons Safeway Grocery Tip in El Monte

On Monday, 6-22-15 at 1500 hours, an anonymous tipster referring to himself as "Tom" called John Boyd and claimed that he was a 37-year employee of the Vons Safeway grocery

warehouse/distribution facility in El Monte. He said he was calling to report what he believed was an illegal and unreported discharge of industrial wastewater into the storm drain at the facility. He said that sometime in the previous 6-12 months an employee had inadvertently washed forklift batteries in an open area such that the runoff went to the storm drain. The caller claimed he had already called the L.A. County storm water illicit discharge reporting line (1-888-CLEANLA) and the City of El Monte with the same information.

Vons Safeway Companies, Inc. IW 726 2300 GPD

10150 Lower Azusa Road

El Monte CA, 91731

Area I.W. Inspector Jim Percy inspected the facility on 7-15-15. His inspection was unable to corroborate or find independent evidence that an illicit discharge to either the storm drain or sanitary sewer had occurred. The forklift battery washing operation was inspected and no problems were found. Discharge from this operation is covered under the existing industrial wastewater discharge permit which also includes discharge from truck washing, steam cleaning, loading dock cleaning, cooler condensate, cooling tower bleed, floor and equipment cleaning and the first 0.1 inch of rain at two outdoor washpad locations. All wastewater (including sanitary) from multiple buildings on the property is collected and discharged at the single connection point at the south end of property. Percy advised Vons' managers to ensure that no industrial wastewater is discharged into the storm drain system. No further investigation is anticipated.

INDUSTRIAL WASTE SECTION SUMMARY OF ACTIVITIES FOR THE MONTH OF JULY 2015

TREATMENT PLANT/SEWER/OTHER INCIDENT INVESTIGATIONS

Valencia WRP Citrus Odor

On Thursday, 7-2-15 at 1818 hours, Valencia WRP TPO II Matt Linn called Night Team Supervising I.W. Inspector Barbara Jenkins to report an orange citrus odor was just noticed at the WRP. He reported all other WRP operational parameters were normal and there had been no adverse effect on WRP treatment processes. A grab sample was taken by operators and was held for the inspection staff.

Investigation by Senior Night Team I.W. Inspector Kent McIntosh and Area I.W. Inspector Peter Carlstrom determined the likely odor source was Flavor Producers in Valencia. The company makes food flavorings. Review of their operations records indicated they had made a batch of fruit flavoring which resulted in the discharge of wastewater with a citrus/fruity odor. WRP operators confirmed that the citrus odor did not negatively affect the WRP's process operations and Flavor Processors was not cited for causing the incident.

Flavor Producers, Inc. IW 17052 2200 GPD 23850 Witherspoon Parkway Valencia, CA 91355

High pH at Manhole (MH) 18 0596 on the Marquardt Avenue Trunk in Santa Fe Springs

On Monday, 7-6-15 at 1420 hours, Compton Field Office Supervising Engineering Technician Albert Steel notified Senior I.W. Inspector Bill Barnum that a one of his staff, Engineering Technician Cedric Jefferson, had encountered unusually cloudy wastewater with an elevated (12.0) pH and "sweet chemical" odor at MH 18 0596 on the Marquardt Avenue Trunk in Santa Fe Springs. Barnum forwarded the information for follow-up investigation by I.W. inspectors assigned to that area.

Inspections conducted at the 8 most likely high pH industrial sources upstream of MH 18 0596 failed to reveal a likely source for the incident. Senior I.W. Inspector Andy Woods led the investigation. Other I.W. inspectors participating were Traci Stahl, Steve Lajkowicz, and night team Senior Kent McIntosh. The incident was short lived with the high pH condition at MH 18 0596 significantly diminishing within 10 minutes of its discovery, thus preventing I.W. Inspectors from tracing the high pH up the sewer to a source. There were no adverse impacts to the downstream collection system or treatment plant operations (LCWRP). Inspectors remain vigilant to any possible sources for this incident. Note that review of Districts' sewer maintenance crown spray and caustic addition activity records found none were being conducted upstream of the incident location on 7-6-15.

Suspicious Activity Tip at SPF Terminals in Compton

On Wednesday, 7-8-15 at 1436 hours, an email was sent by an anonymous tipster to the Districts. It was stated in the email that since 12-18-2014, untreated acid and base industrial wastewater from a water deionization/reverse osmosis purification system had been pumped directly to the sewer. The location was identified as 17899 S. Susana Road, Rancho Dominguez, California 90221. A review of Districts' records indicates this facility location does not have an industrial wastewater discharge permit.

SPF Terminals FID 9249067 0 GPD 17899 S. Susana Rd.

Compton, CA 90221

Senior I.W. Inspector Bill Barnum conducted an inspection of the facility on Thursday, 7-9-15 and found a company operating as SPF Terminals dba Top Blue USA on-site. The facility

blends and packages dry urea mixed with purified water to make diesel exhaust fluid ("D.E.F.") for distribution in bulk and sale in small containers. There were no industrial wastewater drains or connections found at the facility and no evidence of illicit sanitary sewer discharge. The CEO of the company, Mr. Robert Balov, was interviewed during the inspection. However, he claimed no knowledge of the day-to-day operations of the facility and that any waste derived from the blending operation or the reverse osmosis/electronic deionizer is stored in outdoor totes which are picked up by his "customers." Based on the elevated pH found in standing water in an adjacent storm water sump, which is located downstream of a swale where the totes are stored, it appears likely the company is periodically discharging urea laden water and possibly R/O reject into the storm water collection system. Since this is a storm water concern, a referral letter was sent on July 23, 2015 to the Los Angeles Department of Public Works and Los Angeles County Fire-Health/Hazmat for follow up. Barnum will periodically drive by the facility in an effort to document any activities indicating illicit storm water discharges are occurring.



Figure 1: 7-9-15 photo of tanker truck loading/unloading Area at SPF Terminals in Compton. Note the white tote used for wastewater storage against the building and adjacent storm water swale which was found to have small amounts of alkaline (pH=9) water.

Low pH at CEC Vibration Products in Covina

On Tuesday, 7-14-15 at 1245 hours, Districts' I.W. Monitoring Crew Technician Tony Orihuela notified Supervising I.W. Inspector David Lee that upon setting up a composite sampler at CEC Vibration Products Inc. he measured the pH of the wastewater at the legal sample point (sample box) at a very acidic 1.72. Orihuela reported there was no flow to the sewer at the time and he informed the company contact, Operations Manager Jeff Copeland, of the situation.

Area I.W. Inspector Peter Carlstrom responded to the report, arriving onsite at 1000 hours the next day. Carlstrom found pH= 8.41 wastewater in the sample box at that time. The company is a regulated metal finishing operation that manufactures electro-mechanical vibration sensors, accelerometers, strain gages, and other instruments for monitoring machinery condition and health. The permitted I.W. flow is from honing machines, ultrasonic cleaning, and surface prep. None of the cleaning solutions used has an acidic (low) pH. The sample box is a small poly tank located under the sink in the honing/cleaning room. The company also generates waste rinse water from a small electro-clean line that uses phosphoric acid. The I.W. permit allows this to be neutralized and discharged with the other flows noted above, but the company contact claimed this waste stream is being hauled offsite for disposal instead. With no other source of low pH wastewater, the contact was unable to explain the low pH found in the sample box the previous day. It appears likely it was due to an employee dumping the phosphoric acid rinsate into the sink above the sample box. Given the limited volume of the sample box, a relatively limited amount of this low pH waste could have caused the low pH found on 7-14-15. The contact claimed he had already spoken to the workers but none admitted to dumping anything. To insure there's no future reoccurrence, Copeland will monitor the sample box pH daily using test strips for at least the next month. Carlstrom issued the company a verbal warning for the low pH finding on 7-14-15.

One-time Discharge Approval for the Long Beach VA Hospital

On Wednesday, 7-15-14, Environmental Protection Specialist Jason Thompson with the Veterans Administration Hospital in Long Beach called Supervising I.W. Inspector John Boyd and requested a one-time discharge approval. The discharge proposed was 2500-3500 gallons of chlorinated water to be used by an outside contractor to kill possible legionella bacteria in the hospital building's cooling water and hot water supply system. Thompson stated the water would be discharged to the sewer over a 3-hour time period with a free chlorine residual concentration of <2 ppm. The project was planned to get underway at 1900 hours on Sunday, 7-19-15, and conclude by 0500 hours on Monday, 7-20-15, with the discharge occurring at the end of that time frame.

Department of Veterans Affairs Medical Center IW 2925 182,986 GPD 5901 E. 7th St.
Long Beach, CA 90822

After consulting with I.W. Permit Supervisor Linda Shadler and I.W. Hospital Expert Engineer David Sonboli, on 7-17-15 Boyd approved the discharge via e-mail to Thompson and notified Supervising I.W. Inspector David Sanchez and the Area I.W. Inspector, Sanjay Patel, of the approval. No action on the part of the field inspection staff was requested or anticipated by Boyd given the relatively limited volume of water being discharged and the low chlorine concentration that was anticipated.

On Monday, 7-20-15 at 0934 hours, Thompson notified Boyd that the project had been completed without incident and ahead of schedule earlier that morning. Ultimately, the project and associated discharge had no known effect on Districts' operations. As a point of interest, in July 2015 there was an unrelated Legionnaires Disease outbreak in the South Bronx Borough of New York City that resulted in 12 deaths. Also, the Pittsburgh, PA Veterans Administration Hospital had an outbreak from February 2011 to November 2012 that resulted in 6 deaths.

Phoebe Avenue Trunk Sewer Solids in La Mirada

On Tuesday, 7-21-15 at 0715 hours, San Gabriel Yard Supervisor of Sewer Maintenance Bill Balas called Supervising I.W. Inspector John Boyd and reported that on the morning of the previous day, Monday 7-20-15, a Districts' sewer maintenance crew led by Bruce Gomez had found a layer of "foamy or chalky" solid material about 4" deep lying at the bottom of the 24" Phoebe Avenue trunk at MH 18 0662 in La Mirada. Balas said some of the material was retrieved from the trunk for examination and appeared to be older grey colored "polymer-like" material with a blue tint (see figure 2 below). He said the shape of the material indicated it had conformed to the bottom of the pipe. He did not think the material was scale per se, but rather some other solid that had accumulated over time. Balas stated that generally this line is cleaned with a bag, whereas due to low flow conditions, the cleaning on 7-20-15 was done with a

hydrojetter. He said based on the nature of the material in question a bag would generally not dislodge it, whereas a jetter would. Thus he thinks the material could have been in the line for many years, if not decades. He also mentioned that in the past the line contained more flow, but now the flow was much less. Balas said the same operators would be onsite at the same location on 7-21-15 with the sample and suggested I.W. inspectors could meet them onsite to see the sample and trunk line condition.



Figure 2: Solids removed from the Phoebe Avenue trunk in La Mirada on 7-21-15. The solid material was broken up by hydrojetting and removed as the chunks pictured.

Supervising I.W. Inspector David Sanchez led the investigation with the participation of Senior I.W. Inspector Andy Woods, as well as I.W. Inspectors Traci Stahl and Jason Finn. On 7-21-15, the inspectors met with Maintenance & Construction Worker Barry Witherby at MH 18 0662. Witherby reiterated the facts of the incident and added that ten small buckets of grey-blue solids were retrieved from jetting upstream of MH 18 0662. Based on his observations Witherby estimated that the solid material was limited to between 100' to 250' upstream of MH 18 0662. Inspectors examined the material and collected a sample for laboratory analysis. Field testing with 20% hydrochloric acid solution of the solid material revealed it did not react, indicating it was unlikely to be calcium or magnesium carbonate as is typical of common sewer scale.

Two suspect I.W. dischargers were located immediately upstream of reach where the material was found. Nutri Granulations (Permit #: 16510) and Caravan Canopy (Permit #: 21317) were both noted to have the potential to be the source of solids and both were immediately inspected. Nutri Granulations manufactures calcium chloride for use in pharmaceuticals. The company's operations, clarifier and sample box appeared to be in good condition. Caravan Canopy screen prints logos on canopies. The company was issued an written notice of violation by Inspector Stahl for their sample box being loaded with solids, but although the solids in the sample box were blue due to the presence of ink residual, and the likely source of the blue tinting present on some of the solids removed from the sewer; these solids were determined not to be the same as the primary material that comprised the solids removed from the sewer and thus the company was not cited as the source for this incident. Results of laboratory analysis of the solids removed from the sewer are pending. These results may be instrumental in determining the solids' source, especially given the potential for the material having been in the sewers for a decade or more, and

thus possibly being from an industrial facility that may have already left many years ago. No source has as yet been identified, but the investigation remains ongoing.

Nutri Granulations Div of E.T. Horn Co. IW 16510 1200 GPD 16024 Phoebe Avenue La Mirada, CA 90638

Caravan Canopy International, Inc. IW 21317 700 GPD 14600 Alondra Boulevard La Mirada, CA 90638

Illicit Discharge at Precision Auto Repair in Palmdale

On Thursday, 7-23-15, Supervising I.W. Inspector John Boyd received a forwarded e-mail chain from Districts' Monitoring Section Head Ann Heil which included a California Office of Emergency Services (Cal OES) spill report indicating the possible illegal sewer dumping of used oil and automotive anti-freeze at Precision Carstar Auto Body Repair (FID 9249102) in Palmdale. The report indicated the alleged dumping was to both the ground and to "toilet and sinks." It did not indicate the volume of liquid disposed of or if this was a one-time event or occurred routinely.

Precision Carstar Auto Body Repair FID 9249102 0 GPD 38554 E. 6th St. Palmdale, CA 93550

Area I.W. Inspector Jonathon Powell investigated the report, arriving onsite to conduct a site inspection at 1200 hours on 7-28-15. Precision Carstar Auto Body Repair conducts auto body repair and painting operations at this facility. Body work is done in one unit with sanding, dent repair, and other dry operations, and then taken to an adjacent unit for painting and finishing work that includes washing the vehicles. The company has a paint station and spray booth, but no floor drains observed in either unit. Inspection of the facility's restrooms found no evidence of illicit discharges of industrial wastes. The company contact, Owner Mr. Karn Bryan, stated the company generates some waste oil, coolant, and solvent, but said they store it in drums and haul it off-site for proper recycling/disposal. Review of waste manifests subsequently submitted by the company appears to verify this claim. At the time of the inspection some washing operations from wet sanding was observed flowing to a driveway swale (see Figure 3 below), although it appeared to be evaporating prior to entering the offsite storm drain. A contact at a neighboring company, Advanced Mufflers, stated that this occurs frequently. Powell also noticed stains of dried residue leading from the swale to the storm drain. Powell verbally warned Precision Carstar Auto Body not to discharge any industrial wastewater into the storm drain. The owner agreed to look into containing their washing operations to prevent runoff from getting into the storm drain. Powell explained Districts' permit requirements and regulations for such operations. Powell will conduct follow-up inspections to monitor the company's coming into compliance with all applicable industrial wastewater and storm water regulations. Failure to correct storm water violations will result in referral to the City of Palmdale.



Figure 3: Minor amount of wastewater in front of Precision Auto Body Repair observed by I.W. Inspector Jonathon Powell on 7-28-15.

Lancaster WRP Gasoline/Solvent Odor

On Friday, 7-24-15 at 1100 hours, Lancaster WRP Treatment Plant Operator II Jim Barrick called Supervising I.W. Inspector John Boyd and reported that one of the WRP laboratory technicians had noticed a light gasoline-type odor coming from the primary tanks at 1040 hours. Barrick said he went out to check for the odor himself shortly thereafter, but didn't notice anything at the primary tanks. He then went to the influent pumping wet well and noticed what he described as a feint 'solvent" type odor. A sample was taken from the wet well.

| Source | Date | Time | Benzene (ug/l) | Ethyl Benzene (ug/l) | Toluene (ug/l) |
|-------------------|---------|------|----------------|----------------------|----------------|
| Lancaster WRP Raw | 7-24-15 | 1100 | 8.7 | 22.4 | 91.5 |
| Andy Gump Load | 7-24-15 | 1019 | 10,200 | 27,900 | 116,000 |

Figure 4: Sample results chart.

Area I.W. Inspector Jonathon Powell went to the Lancaster WRP immediately upon being notified of Jim Barrick's concerns. He arrived on-site at 1200 hours (within an hour of the first call) and spoke with both TPO II Barrick as well as LWDS Attendant Miguel Salazar. Based on statements from Salazar and Barrick, as well as sample analysis results (see chart above), and the timing of the LWDS discharge, the cause of the gasoline odors at the Lancaster WRP influent wet well was determined to be due to the presence of some petroleum product, likely gasoline, in a load of septic waste dumped at the LWDS by an Andy Gump truck at 1020 hours that day. Fortunately, other than the presence of the odor, there were ultimately no negative impacts on treatment plant processes or final effluent quality due to the relatively limited volume and concentration of gasoline material in the load. The hauler (Andy Gump) was sent a letter of reprimand on 8-5-15 regarding the illicit dump. The LWDS attendant was also reminded about prohibited wastes and told to contact Industrial Waste Section staff immediately if he noticed any unusual characteristics in a hauled waste load brought for disposal.

Los Coyotes WRP Elevated pH and White Color

On Monday, 7-27-15 at 0452 hours, Los Coyotes WRP Treatment Plant Operator II Will Moriarty telephoned Night Team Senior I.W. Inspector Kent McIntosh to report that the WRP was experiencing a high pH incident with an associated white color. He reported that the influent pH had risen to 9.14 at 0420 hours and that the wastewater had a "chemical" odor. The

influent remained at 9.14 at 0430 hours. Moriarty reported WRP operations were otherwise normal, but added that they were increasing the primary air pumps, just in case.

Compton Field Office Civil Engineer Julio Fernandez was subsequently contacted at about 0700 hours later that morning by Senior I.W. Inspector Andy Woods, who led the investigation of this incident. Fernandez reported that crown-spraying treatment was conducted upstream of LCWRP on the South Whittier Outfall relief trunk sewer on Carmenita Road in Santa Fe Springs (MH 18 0888-MH 18 0874) during the early morning hours of 7-27-15. The time of the reported incident, wastewater color, and pH correlate well with the upstream crown spraying activity. LCWRP operators were unaware that the crown spray activity time was moved to an earlier start time than usual to allow the work to be conducted when traffic would be minimal in normally very busy Carmenita Road. As such, the 0430 hours pH alarm was unusual to the on-duty operators. WRP operators were subsequently made aware of the change and the next day a similar rise in influent pH at the same time as on 7-27-15 was correctly attributed to the crown spraying activity.

JWPCP Excessive Black Solids

On Thursday, 7-30-15 at 0858 hours, JWPCP Treatment Plant Operator II Mike Hernandez called Senior I.W. Inspector Barnum notifying him of excessive solids with an oily appearance fouling primary skimmers 37-53 in the E-3 sedimentation tank battery. However, influent pH and LEL were at normal levels. Barnum initiated an investigation and responded to the primary skimmers with Team 3 I.W. Inspectors Michael Placencia and Shawn Cleaver.



Figure 5: E-3 south battery primary skimmer black solids observed on 7-30-15. Note how the solids appear essentially visually identical to that of a black oily material.

Inspections conducted on upstream trunk sewer lines and the three large oil refineries influent to the E-3 Primary Sedimentation Tank Battery failed to find any evidence of the material either in the sewers or having been discharged from one of the refineries. Although reported as appearing oily, the material did not have either the texture nor odor of petroleum related material, but instead polymerized digested sludge, which is known to occasionally

recycle into the JWPCP from the Solids Processing Unit by way of the overflow lines from the sludge wet wells and the centrate treatment. When queried about this possible source for the material, operators claimed no knowledge of any spill or upset in Solids Processing Unit that could have caused the 7-30-15 incident. By 1230 hours E-3 South Battery was back to normal and JWPCP treatment plant operations were otherwise unaffected by the incident. All indications are that the solids entered the plant through the J.O. 'A' headworks. I.W. Inspectors concluded that the slug of solids entered the plant from the Solids Processing Unit in a similar way as occurred during a previous incident on 1-27-15. No further investigation is anticipated at this time.

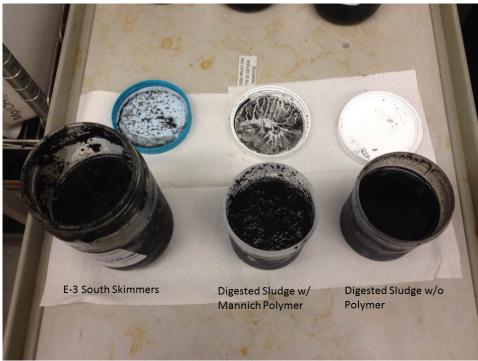


Figure 6: Comparison of the black solids removed from the JWPCP skimmers on 7-27-15 with digested sludge containing Mannich polymer that was taken from the JWPCP Solids Processing Unit.

INDUSTRIAL WASTE SECTION SUMMARY OF ACTIVITIES FOR THE MONTH OF AUGUST 2015

TREATMENT PLANT/SEWER/OTHER INCIDENT INVESTIGATIONS

Lancaster WRP High Influent Flows

On Wednesday, 8-5-15 at 1330 hours, Lancaster WRP Supervising TPO Dan Shubin notified Supervising I.W. Inspector David Lee that at around 1200 hours a large amount of "rags" had entered the Lancaster WRP influent system followed by an increased volume of flow. Shubin said that operators had had an issue with influent volumes earlier in the week which they thought was associated with a problem with the influent pump controls, but now he thinks that the problem may have been from ragging the whole time. Shubin says that operators had been able to handle the increased influent volume by activating back up pumps. He stated that they would collect a sample of the rags for review by I.W. inspectors.

Area I.W. Inspector Jonathon Powell responded to the WRP to investigate. During his 8-6-15 site visit and discussion with WRP operators, Powell found that the primary issue and reason for notifying the industrial waste section of these incidents was the periodic readings of high influent flows operators have been seeing in the afternoons of the past 4-5 days (not ragging). Operators reported that the initial report of ragging being the main problem was not necessarily the case. Subsequent inspections by Powell of the 3 largest known flow/ragging sources; two prison facilities and an industrial laundry, revealed no evidence that any had had any unusual discharges or events that could have caused the high flow rates noted at the Lancaster WRP.

On Tuesday, 8-11-15 a discussion took place by phone between I.W. personnel including Supervising I.W. Inspectors Dave Lee and John Boyd, Powell, I.W. Section Head Dave Snyder, and Districts' WRP Project Engineer Dave Pierce. Pierce indicated that he had been notified of the unusual influent flows readings at the Lancaster WRP the previous week by plant operators. During his review of the plant data and discussions with other engineering and instrumentation personnel, Pierce felt that there were anomalies in the information which may have indicated that the source of the "increased influent flows" could be an onsite instrumentation problem. Specifically, Pierce said that there appeared to be a problem with the pump control sensors in the influent wet well which may be providing inaccurate data, causing inconsistent pump activity, in turn leading to false indications of higher influent flow. He said that engineers and operators would be investigating the issue, but that until the instrumentation issues were corrected, it would be difficult to accurately assess the actual volume of influent flow at the plant. The discussion concluded any further I.W. inspector investigation into an external source of high influent flow would be ceased until the plant instrumentation data could be substantiated.

On Wednesday, 8-12-15 Lancaster WRP TPO II Jim Barrick reported to Boyd, Lee and Powell that WRP operators now believed that the recent reports of high influent flow into the plant were probably from an issue with the influent pump control system. He said that a suspicion of the accuracy of the level sensors in the influent wet well led to a test of the system where they manually manipulated the influent pumps to recreate the "high flow" event. The test confirmed that the problem was with the instrumentation. He speculated that perhaps a recent heavy rain event in the area caused a large volume of flow along with sediment and rocks being brought into the plant which may have impacted or damaged some of the sensors. Boyd told Barrick that I.W. staff would cease the investigation for a source of the high flow and maintain communication with operation personnel for future updates on the issue.

Tesoro Carson Refinery Discharge Line Descaling Project

On Monday, 8-17-15 at 0911 hours, an I.W. Section Secretary received a telephone call from Supervising Environmental Manager John Shao of the Tesoro Carson oil refinery (formerly the BP/Arco refinery). Shao said he was calling to speak with Supervising I.W. Inspector John Boyd about his facility proposing to bypass the "view box" at their outfall to facilitate the routine periodic removal of scale that builds up and obstructs their 30" diameter I.W. discharge line.

This information was forwarded to Supervising I.W. Inspector John Boyd, who in turn discussed it with Senior I.W. Inspector Bill Barnum and Area I.W. Inspector Shawn Cleaver. The company subsequently submitted a work plan as required by the Boyd (see figure 2 below) and the project was approved. Work commenced on 8-24-15. The line will be hydrojetted, with completion anticipated to occur in the first week of September. The company and Cleaver will work cooperatively to insure that there are no negative impacts to the Districts' system, especially as concerns the prevention of improper access to the Districts' MH B18A by the company where their discharge line connects the J.O. 'B' trunk.

Tesoro Refining & Marketing Company LLC IW 21299 5,250,500 GPD 1801 E Sepulveda Boulevard Carson, CA 90745



Figure 1: Example of the scale that typically builds up in the Tesoro refinery's 30" diameter I.W. discharge line. This photo was taken of the line in 2009.

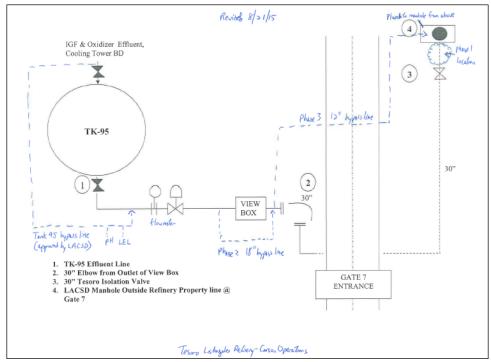


Figure 2: Work plan drawing submitted by the Tesoro Refinery on 8-21-15.



Figure 3: Worker accessing manhole B18A on 8-24-15 to hydrojet the Tesoro Refinery's line where it connects to the J.O. 'B' trunk (Photo by Districts' I.W. Inspector Shawn Cleaver).

Storm Drain Discharge at Partners Alliance in Ontario

On Thursday, 8-27-15 at 1000 hours, during a routine joint LACSD/IEUA (Inland Empire Utilities Agency) follow-up inspection at Partners Alliance Cold Storage in Ontario Districts' Area I.W. Inspector James McCurdy and IEUA I.W. Inspector Ruben Vasquez noticed an excessive amount of water in approximately 200' of street gutter in front of the facility. The facility was formerly operated as a fresh citrus fruit processing plant by Sunkist Growers Corp, but following a change in ownership in 2010 after Sunkist moved the fresh fruit processing operations into Central California, the facility is now operated as a fruit juice concentrate

blending, storage and distribution operation. Industrial wastewater is primarily generated from cleaning and sanitizing the juice holding and processing tanks and equipment.

Partners Alliance Cold Storage Inc. 617 E Sunkist Street Ontario, CA 91761 IW 20816

8000 GPD



Figures 4 and 5: Spilled process wastewater noted at Partners Alliance Cold Storage on 8-27-15.

The facility contact initially claimed the water in the gutter was from irrigation but upon further questioning of other facility employees, it was discovered that a spill of industrial wastewater had occurred from the southern part of the property that morning at 0745 hours. McCurdy estimated the amount of water in the gutter at 150 gallons. Vasquez reported the spill to the local storm water control authority, the City of Ontario, at 1015 hours. A city inspector subsequently arrived onsite at 1030 hours. Further investigation revealed that an industrial wastewater collection system wet well pump, as well as a back-up pump at the wet well, both failed, causing an upstream drain in the driveway to eventually overflow to the gutter (see Figures 4 and 5 above). Investigation of the downstream storm drains revealed little evidence the spill reached beyond the 200' street gutter noted earlier and the spilled wastewater was then collected. A sample of the wastewater was found to have pH=6, as well as light brown color and putrid odor. The sample was then submitted for testing to determine its proper disposal method.

Restaurant Grease Dumping Tip in West Covina

On Thursday, 8-27-15 at 1400 hours, I.W. Section Head Dave Snyder forwarded a voicemail message to Supervising I.W. Inspector John Boyd. The message contained two separate messages; one from San Gabriel Field Office Supervising Engineer Abdul Edouni and an attached message from Los Angeles Regional Water Quality Control Board Enforcement Unit Environmental Scientist Lala Kabadaian. Edouni explained that he had received the attached voicemail message and was forwarding it to the I.W. Section. Ms. Kabadaian reported in her message that she had become aware of an anonymous tip posted on the EPA's national tip database where the tipster alleged that fryer grease was being dumped into a sewer drain at a restaurant in West Covina. Boyd subsequently called Kabadaian to get more information. Kabadaian reported the restaurant as the "Stinkin Crawfish," located at 2518 E. Workman Avenue, West Covina. Boyd forwarded the information to Supervising I.W. Inspector Dave Lee. Boyd and Lee agreed that the preferred approach would be for a Districts' investigating I.W. inspector to conduct a joint inspection of the restaurant with a city of West Covina inspector. City inspectors conduct the Fats, Oils, and Grease (FOG) program compliance inspections at West Covina restaurants. Area I.W. Inspector Pat Cashen will likely conduct this joint inspection sometime in September 2015.

Union Pacific Railroad Acid Spill in Santa Fe Springs

On Monday, 8-31-15 at 0730 hours, I.W. Section Administrator Loretta Benites came to Supervising I.W. Inspector John Boyd's office at JAO and reported that she had heard a news report that a railroad related acid spill had occurred in Santa Fe Springs near the intersection of Pioneer Blvd and Norwalk Blvd. Boyd checked the California Office of Emergency Services (Cal OES) spill reporting website and verified there had been an acid spill on the Union Pacific railroad tracks reported in this area. The report indicated the spill had occurred at 0723 hours and consisted of an unknown amount of hydrochloric acid dripping onto the tracks from a railroad tanker car. The report also indicated that the Santa Fe Springs Fire Department, as well as L.A. County Health/Hazmat, were onsite responding. The information was forwarded to Team 2 Supervising I.W. Inspector David Sanchez at 0750 hours for follow-up.

On 08-31-15 at 0845 hours, Senior I.W. Inspector Andy Woods and I.W. Inspectors Steve Lajkowicz and Sanjay Patel responded to the incident location. Inspectors met with the incident commander Brent Hayward - Division Chief Santa Fe Springs Fire Department, and Richard Kallman-Environmental Protection Specialist for City of Santa Fe Springs. According to Chief Hayward a railcar operator noticed white fumes venting from a railcar top fitting while switching the subject car to a new rail line. Recognizing the railcar contained hydrochloric acid, the operator made the necessary notifications regarding the potential release of acid into the environment. Santa Fe Springs Fire responded to this notification. Hayward speculated that sloshing liquid inside the railcar increased the internal pressure, which in turn exposed a faulty seal at the top fitting. Hayward estimated 0.5 gallon of hydrochloric acid was released from the railcar, and all of the material remained on the side of the railcar, never reaching the ground. Hayward designated Raul Diaz, Santa Fe Springs FD Environmental Division, to monitor/oversee the decontamination operations. Diaz said that decontamination would likely involve wiping the railcar with cloths and not washing the car. Therefore, no wastewater was generated from the spill or decontamination/cleanup operations. There was no impact to the Districts' sewer system.

Low pH Discharge at A & G Engraving in Vernon

On Monday, 8-31-15 at 1100 hours, I.W. Section Monitoring Crew Technician Alfred Johnson notified Supervising I.W. Inspector David Lee that upon setting up a 24-hour composite sampler at A & G Engraving Inc. he measured the pH of the wastewater at the sample point at a highly acidic 1.03 (limit is that the pH be 6 or above). Johnson said there was a minimal amount of flow visible at the sample point, i.e. less than 1 gpm. Johnson noted he had also taken a grab sample from the sample point that will be submitted for heavy metals analysis due to the low pH finding.

A & G Engraving, Inc. 3846 s. Santa Fe Ave. Vernon, CA 90058

IW 11013 900 GPD

Senior I.W. Inspector Steve Sealy arrived onsite at 1200 hours on 8-31-15. He found that the industrial wastewater in the sample box had already been raised to pH=12.11. Company President Andrew Frumento reported the earlier low pH had been caused by an operator failing to neutralize a batch of wastewater prior to its discharge. The company uses nitric acid and ferric chloride solution to manufacture photo-engraved magnesium and copper foil printing plates. Rinse water from their processes is highly acidic and is required to be manually batch neutralized using soda ash addition into a 100-gallon batch tank prior to its discharge to the sewer. A written notice of violation was issued to Frumento by Sealy for the low pH discharge.

| | SANITATION DI | LES COUNT | ENFORCEMENTACTION NO.: FASTIW118187503 | | | | | | |
|-----------------------------------|---|--------------------------|---|--|-------|-------------------|--|--|--|
| | SANITATION DISTANTENTIA 1955 WORKMAN MILL RI NOTICE | DN: INDUS D., P.O. BO | TRIAL WASTE SEC X 4998, WHITTIER | TION , CALIFORNIA 9 | 0607 | | | | |
| A & G Engraving, Inc. 38 | | | | DORESS OF WASTEWATER DISCHARGE 3846 S Santa Fe AVENUE Vernon, CA 90058 | | | | | |
| LOCAL AGENCY City of Vernon | | | 1880380 | | | | | | |
| VIOLATION(S) DATE VIOLATION TYPE | WASTEWATER ORDINANCE | SAMPLE | | RESULT | LIMIT | UNIT | COMMENTS | | |
| 8/31/15 At Any Time Limit | 406C Discharge of any waste having a pH lower than 6.0 | 011013/ | A pH | 1.03 | 6.0 | S.U. | pH Measured below local limit of 6.0 | | |
| 8/31/15 At Any Time Limit | 210 Discharge of wastewater pollutants in excess of Federal EPA Categorical Regulations, Title 40 | 011013/ | A pH | 1.03 | 5.0 | S.U. | pH measured below Federal EPA limit of 5.0 | | |
| IMPORTANT: VIOLATION MUS | GRACE ROBINSON HYDE CHIEF ENGINEER AND GENERAL MANAGER | | | | | | | | |
| | | Presi | | ISSUED Stephen Sealy NAME Senior Inspector | | nen Sealy NAME | | | |
| | Undter | | | | | | 117LE 31/2015 | | |

Figure 6: Notice of Violation issued to A&G Engraving Inc. on 8-31-15 by Senior I.W. Inspector Steve Sealy for low pH discharge.

INDUSTRIAL WASTE SECTION SUMMARY OF ACTIVITIES FOR THE MONTH OF SEPTEMBER 2015

TREATMENT PLANT/SEWER/OTHER INCIDENT INVESTIGATIONS

<u>Tip of Suspected Automatic Water Softener(s) in the Santa Clarita Valley</u>

On Tuesday, 9-1-15 at 1005 hours, Supervising I.W. Inspector John Boyd received an e-mail from I.W. Section Chloride Project Permit Engineer Preeti Ghuman that contained an inquiry e-mail she had received earlier that day from Director of Operations Michael Alford of the Newhall County Water District (NCWD) regarding speculation that a finding of higher than expected flows in a 24" local sewer line by a NCWD sewer construction crew were due to self-regenerating water softener unit(s) operating upstream. Alford reported that a construction crew installing a new manhole on the sewer line had blocked off the sewer at approximately 2300 hours on Tuesday, 8-18-15, anticipating there would be very little flow in line until 0700 hours the next morning thus allowing a new manhole riser to be installed. However, the crew noted that flows were higher than they expected and appeared "clearer than typical sewage." Alford stated this led him to suspect the flow may have been from illicit self-regenerating water softeners operating in the area upstream. However, no sample of the flow in question was taken, nor were any field tests for conductivity or TDS conducted.



Figure 1: LACSD GIS Upstream Sewer Trace Diagram for local sewer manhole where higher than expected early a.m. flows were noted on 8-18-15.

Boyd forwarded the information to North Teams Supervising I.W. Inspector Dave Lee and Santa Clarita Area Inspector Anie Kellzi. Joint examination of the map attachments provided by Mike Alford, as well as review of Districts' GIS sewer maps and satellite photos (see Figure 1 above), indicated the area upstream of the manhole construction site has essentially no industrial wastewater sources. There are a few commercial businesses (gas station, haircut salon, and restaurants-Denny's/In-N-Out), schools, churches, a country club with a restaurant, and likely +1,000 residences. Although it is certainly possible there may be residences in the area operating illegal water softeners, the lack of anything other than the observation of wastewater appearing to be "clearer than typical sewage" on a weekday evening at 2300 hours with no other corroborative data, in no way provides definitive evidence of this. Ultimately it was decided, after Boyd discussed the case with I.W. Section Head Dave Snyder on 9-2-15, that this location would be put on the list of possible "neighborhood sampling" sewer manhole sites that the Districts' Industrial Waste Monitoring Crew will likely begin monitoring in 2016 as the Districts moves into the next phase of searching for illicit automatic water softener units by performing testing of wastewater in manholes that contain flows from various neighborhood

developments in the Santa Clarita area (so called "neighborhood sampling"). No further investigation of this particular report by the I.W. Inspection staff is anticipated at this time.

Elevated Explosivity in the J.O. 'A' Unit 4 Trunk in Long Beach

On Wednesday, 9-2-15 at 1440 hours, Senior I.W. Inspector Bill Barnum was notified by Districts' Compton Field Office Technician Jose Munoz that a sewer maintenance crew conducting sewer cleaning operations had found LEL=87% at 1400 hours at Manhole (MH 03A1077 in Long Beach. The information was forwarded to night team Supervising I.W. Inspector Barbara Jenkins for follow-up. Note that the manhole in question is adjacent to the Dominguez cluster and is the upstream manhole on a double barrel siphon that crosses under the Los Angeles River (see Figure 2 below). At about 1600 hours Jenkins contacted the downstream treatment plant, JWPCP, where STPO II Saminda Mapatunage reported no elevated LEL readings had been noted at the primary headworks on 9-2-15.

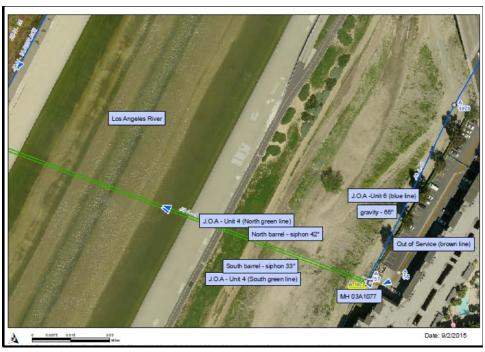


Figure 2: LACSD GIS Diagram with annotation showing the trunk sewer lines in the area around MH 03A1077 where elevated explosivity was found on 9-2-15. Note that MH 03A1077 is located on the J.O. "A" - Unit 4 sewer trunk just upstream of a double barrel siphon. The north barrel is a 42" line and the south barrel is a 33" line.

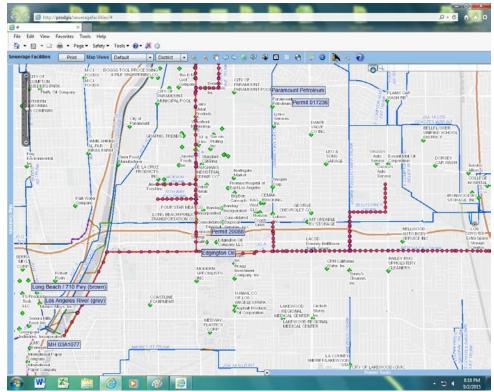


Figure 3: GIS MH 03A1077 upstream sewer trace diagram showing the location of permitted I.W. dischargers including the Edgington Oil and Paramount Petroleum refineries, the two known prime suspect Sources for elevated LEL.



Figure 4: Sewer diagram indicating I.W. inspector explosivity levels found at various manholes during their investigation on 9-2-15.

Night Team Senior I.W. Inspector Kent McIntosh, along with I.W. Inspectors Kristopher McGinnis and Tanna Pekin investigated the report. They confirmed the presence of high LEL conditions at MH 03A1077 (See Figure 4 data above). The night inspectors investigated the two upstream oil refineries, Edgington Oil Company LLC (Permit 20088) and Paramount Petroleum (Permit 17236); both were found to have 0% LEL per shake jar tests at their outfalls and were ruled out as being the source of the explosive conditions in and around MH 1077.

The next morning on Thursday, 9-3-15, I.W. inspectors, led by Senior I.W. Inspectors Bill Barnum and Andy Woods, collected a headspace sample from MH 03A1077 after they

measured 80% LEL using a GasTech LEL meter in the headspace. The sample was submitted to JWPCP for analysis. A few hours later, JWPCP Lab Supervisor Will McCully reported the sample contained 8.5% methane by volume, which equates to 170% LEL. This data indicates the elevated LEL was due to methane generated in the sewer trunk line's double barrel siphon structure. Barnum notified Compton Yard's Supervisor of Sewer Maintenance Rick Pearce of the explosive condition at MH 1077 and its likely source. Pearce stated he would inform his superior, Superintendent of Wastewater Collection System O&M Doug Walton, of this and suggest venting the structure and installing a carbon canister inside the manhole.

Saugus WRP Petroleum Odor

On Thursday, 9-10-15 at 1402 hours, Superintendent of Treatment Plant Operations Junior Johnson sent I.W. Section Head Dave Snyder an email reporting a strong petroleum odor (like "fuel oil" per STPO Brian Gifford) was noticed by operators at the Saugus WRP on 9-9-15 and 9-10-15. The source of the odors, as acknowledged by operators, was reported as two 5000-gallon loads of purported "waste holding tank" wastewater brought from the now-closed Santa Clara Wastewater Company in Santa Paula, CA by Green Compass Environmental LLC, the parent company of the Santa Paula facility. The LWDS attendant, Francisco Ramirez, accepted these loads despite the screening samples taken from each load being black in color with a strong petroleum odor. The attendant simply noted the samples had an acceptable pH (7 and 7, respectively) and TDS (490 mg/l and 368 mg/l, respectively) before accepting the loads for disposal. Johnson requested Snyder have I.W. staff investigate the situation further.

Two screening samples, one from a 9-1-15 rejected load from the same facility, and a second from the 9-10-15 load (approximately 250 ml each), were picked up by area I.W. Inspector Anie Kellzi and submitted for TTO and metals analysis. The Santa Clara Waste Water Company facility in Santa Paula is owned by Green Compass Environmental LLC. The facility in Santa Paula is now closed but until 11-18-2014 was operated as a centralized waste treatment facility (CWTF). On 11-18-14 at approximately 0330 hours, a large tanker truck explosion and fire occurred at the facility which resulted in the Ventura County D.A. arresting and charging at least nine executives and employees of Green Compass Environmental LLC and the CWTF for committing multiple offenses, including conspiracy to commit a crime, knowingly failing to warn of serious concealed danger, and hazardous waste and labor violations. Given this information, it was suspected that the material delivered to the Saugus LWDS on 9-1-15, 9-9-15, and 9-10-15 may have been wholly industrial wastes or mixed industrial and sanitary wastes, neither of which can be brought to the LWDS legally for disposal.

On 9-10-15 at 1537 hours I.W. Section LWDS Program Engineer David Sonboli, having been informed of the situation, spoke on the telephone to Mr. David Wirsing of Green Compass. Wirsing said he was aware of the situation and assured Sonboli that this type of load would no longer be brought to Districts' disposal sites. Sonboli said Mr. Wirsing was very apologetic and expressed his sincere regrets for the incidents. I.W. Supervising Engineer Bill Cheyne requested Sonboli clarify with the LWDS attendant that per standard protocol, questionable loads, even if they meet pH and TDS requirements, should be discussed with I.W. Section staff prior to being accepted.

Test results for the two submitted load screening samples indicated each contained 3-4 mg/l of gasoline constituents. The samples also contained elevated concentrations of heavy metals including copper (47.6 mg/l) and zinc (74.3 mg/l). It was noted that Districts' laboratory managers were unable to certify the gasoline compound results as the samples were not collected using zero-headspace vials, but were instead taken with standard load retain sample jars. As such, lab managers characterized the sample results as "qualitative, not quantitative," thus their use for enforcement purposes may be limited. Supervising I.W. Inspector John Boyd will bring this information to the attention of Federal EPA Agents who are participating in the prosecution of Green Compass to see if there is any interest in incorporating it into their case.

Anonymous Tip of Diesel Fuel Spill/Discharge into the Storm Drain in Signal Hill

On Monday, 9-14-15 at 1132 hours Supervising I.W. Inspector John Boyd received an e-mail from Districts' Technical Services Department Assistant Department Head Martha Tremblay. The e-mail contained an anonymous tip form that was received by the California State Department of Toxic Substances (DTSC) on 9-10-15. The tipster stated they had observed an unspecified amount of diesel fuel in a street gutter on Wednesday, 9-9-15 at 1300 hours at

1820 Coronado Avenue in the city of Signal Hill. The DTSC form indicated that in addition to the Sanitation Districts, the tip was also forwarded to the Los Angeles County Department of Public Works (LADPW) Stormwater Division, which regulates storm drains in Signal Hill under contract to the city, as well as to the L.A. County Fire Department. Boyd called Tremblay to discuss the situation and what would be the proper response from the Districts. It was agreed that an I.W. inspector would respond to the reported location to verify there was no impact on the sewer and ensure all Districts' requirements and regulations were being met.

On 9-21-15 Area I.W. Inspector Sanjay Patel inspected Pacific Trux, the company located at 1820 Coronado Avenue in Signal Hill. He reported the facility is a trucking company that buys and sells diesel trucks that are no longer commissionable in the State of California due to stringent emission regulations. The company does minor maintenance operations on-site such as engine tune-ups and oil changes. Patel noted a 55-gallon drum full of waste oil on-site. No wastewater producing operations were found. The company contact stated they recently had been inspected by a local city code enforcement officer due to the anonymous tip of his company having spilled diesel fuel to the sidewalk. The contact indicated the officer did not find any evidence to support the tip and reiterated there had been no diesel spills at the facility. The contact then showed a copy of the city inspector's report to Patel. The report indeed indicated that no issues were observed on-site. No further action by Districts' staff is anticipated.

Lancaster LWDS Load with Elevated TDS and High pH

On Monday, 9-14-2014 at 1245 hours, Lancaster WRP Assistant Treatment Plant Operator Jacqueline Rose, who was currently acting as the LWDS Attendant called Supervising I.W. Inspector John Boyd and reported that a 3000-gallon septic tank load just brought to the station by Alex Sanitation LLC had an elevated pH (10.0) and an elevated TDS of 4100 mg/l (acceptance guidelines for septic tank waste is that the pH be 6-8 and the TDS be <2000 mg/l). She reported that otherwise the load had a normal odor, appearance and color (dark) for septic tank waste. The load manifest listed the generator as an Arco AM/PM convenience store/gas station located at 33488 Crown Valley Road, Acton, CA 93510. Boyd used Google maps and the Districts' geographic information system (GIS) to verify the address did correspond to an AM/PM in Acton where there is no sewer service. Rose asked if the load should be accepted or rejected. Boyd advised Rose to accept the load. It's likely the elevated pH and TDS are due to the presence of a water softener at the site and/or the use of drain cleaning chemicals (i.e., caustic) there. I.W. inspectors will conduct a follow-up investigation to verify the information on the waste manifest.

At 1315 hours on Monday, 9-14-15 Boyd called the AM/PM and spoke with Attendant "Gabby." Gabby confirmed that Alex Sanitation had serviced their septic tank earlier that day. She also stated the servicing had been done because the facility's septic tank had become full and backed-up into their "emergency tank." Area I.W. Inspector Jonathon Powell will stop by on his next trip up to this area to follow-up.



Figure 5: Arco AM/PM located at 33488 Crown Valley Road in Acton on 9-17-15.



Figure 6: 1500 gallon septic tank system located in the parking lot of the Arco AM/PM facility on 9-17-15.

Powell inspected the Arco AM/PM facility on Thursday, 9-17-15. He confirmed the presence of a 1500-gallon septic tank on-site that is serviced every 6-8 months according to the owner, Mr. Hossein Shoar. Powell reviewed all operations at the facility. The inspection did not reveal any evidence of wrongdoing or illicit activity either at the facility or on the part of the waste hauler. A bottle of high pH drain cleaning solution "Pro Power Drain Cleaner" was noted at a mop sink inside the building, but Mr. Shoar stated it hadn't been used recently. Despite this, Powell thinks it likely the use of the cleaner was the source of the high pH found in the load brought to the Lancaster LWDS on 9-14-15. No further investigation or follow-up action is anticipated.

Milk Spill at Zausner Foods in the City of Industry

On Sunday, 9-20-15 at 0847 hours, Plant Manager Gilbert Bourgouin of Zausner Foods in the City of Industry called Supervising I.W. Inspector John Boyd at home to report that at 0215 hours earlier that day, the facility lost power and upon the power being reestablished shortly thereafter, a computer glitch occurred upon reboot that caused the accidental release of approximately one-half the contents of a partially full silo of raw milk to floor drains. Approximately 20,000 pounds of milk (2500 gal) flowed into the sewer. Workers were able to close the valve to stop the release, but not before the 2500 gallons of milk noted above was discharged. Bourgouin stated workers were in the process of cleaning up the spill. Area I.W. Inspector Pat Cashen will respond to the facility on Monday, 9-21-15 to investigate and follow-up.

Zausner Foods (dba. Fleur de Lait West, LLC) IW14747 30,000 GPD 17575 E. Valley Blvd. City of Industry, CA 91744

At 0915 hours on 9-20-15 Boyd contacted operators at the SJC East WRP to get a situation report on plant operations. Boyd spoke with TPO II Courtney Clark. Clark reported that earlier that morning he had noted a decrease in the dissolved oxygen concentrations in the first passes of the secondary tanks. He said he responded to this by turning up the process air compressor (PAC) blowers. Subsequently, the dissolved oxygen levels quickly returned to normal. Clark said he was glad to know what had caused the decrease in D.O. concentrations. Ultimately, the WRP was able to handle the extra load without difficulty and final effluent quality was unaffected.

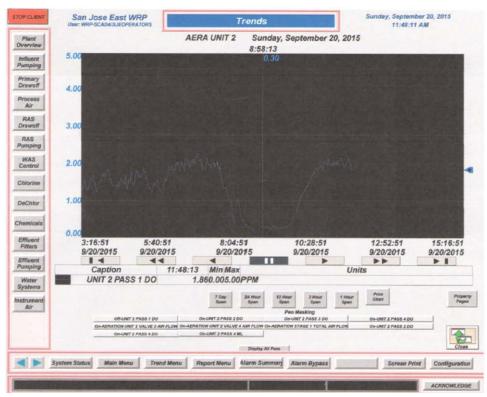


Figure 7: SJC East WRP SCADA system screen shot of Aeration Unit 2 dissolved oxygen data trend on 9-20-2015.

A follow-up site inspection at Zausner Foods on 9-21-15 by Area I.W. Inspector Pat Cashen confirmed that a brief power failure in the overnight hours at the facility the previous day caused a computer malfunction which led to the release of approximately 3500 gallons of milk to the sewer. Representatives at Zausner Foods said that they were investigating the plant computer programming to find a solution which would prevent the situation from recurring. In the meantime they will be manually closing all valves on storage tanks during the overnight hours.

San Jose Creek East WRP Low Dissolved Oxygen Concentration

On Tuesday, 9-22-15 at 0800 hours, San Jose Creek East Supervising TPO Jeff Valdes left a voice mail message for I.W. Inspector Pat Cashen reporting that at approximately 1615 hours on the previous day (Monday, 9/21) the SJC East WRP saw a drop in dissolved oxygen concentrations in the first passes of the aeration tanks. Operators responded by increasing PAC output which quickly compensated for the demand and by 1815 hours the levels were back to normal. Valdes indicated that the event was "definitely less than the earlier event on Sunday, 9/20" caused by the accidental discharge of 3500 gallons of milk from Zausner Foods (see incident notes above). On 9-21-15 WRP operators saw no visual evidence of any abnormalities in the wastewater, the pH was normal and there were no lasting effects on operations. Valdes wanted to notify the I.W. Section of this most recent incident in case there was some relation to the 9/20 event.

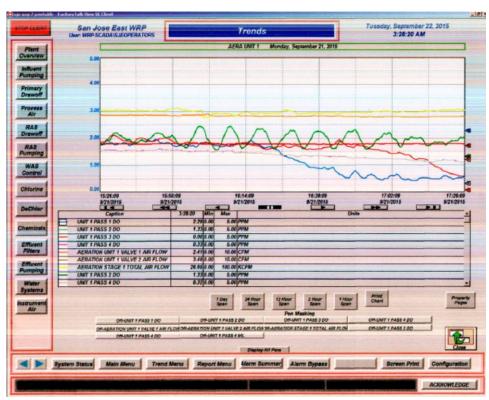


Figure 8: SJC East WRP SCADA system screen shot of Aeration Units 1-5 dissolved oxygen data trends on 9-21-2015.

Investigation inspections were conducted by I.W. Inspectors Cashen and Nguyen Dang at multiple (9) suspect upstream industrial waste dischargers, including Zausner Foods LLC. These inspections failed to identify a likely source for the of the 9-21-15 incident. I.W. inspectors will continue to monitor WRP operations and respond to any future incidents.

Carson LWDS Rejected Load

On Monday, 9-21-2015 at 1240 hours, JWPCP LWDS Attendant Paul Adams called Supervising I.W. Inspector John Boyd and reported that a 7000-gallon load of claimed septic waste hauled to the LWDS by Ely Jr's Pumping and Septic System had an unusual appearance. Adams described it as "like acid." The load had a low pH of 3.5 and a TDS of 913 mg/l. The TDS is within guideline limits, but the pH is substantially more acidic than the pH 6 limit. Boyd advised Adams to reject the load based on the low pH. The load manifest listed the two load generators as 2000 gallons of septic tank waste from Choladas Restaurant in Malibu (18763 Pacific Coast Highway) and 5000 gallons of septic tank waste from Calamigos Ranch in Malibu (327 Latigo Canyon Road). Adams stated he would retain two samples of the load for possible pick-up by investigating I.W. inspectors.

Area I.W. Inspector Tingting Wei follow-up on the rejected load report on 9-28-15. The Choladas Thai restaurant was closed at time of her arrival, but she was able to speak with some of the employees as they arrived at the restaurant to work and they enabled her to contact the

restaurant's manager, Ms. Bubble Charoensak. Ms. Charoensak stated that after the load was rejected, Ely Jr's Pumping had communicated with her regarding the acidic chemicals admittedly in use for cleaning at the restaurant. They were told to use acidic cleaners as sparingly as possible to minimize impact on the waste in the septic tank. Ms. Charoensak stated she had been unaware of this issue. She was very apologetic and said the restaurant would be very mindful from then on regarding cleaner usage.

On Tuesday, 9-22-15 at 1000 hours, JWPCP LWDS Attendant Bob Smith called Boyd and reported that the rejected load had been brought back for discharge earlier that morning at 0615 hours after it had been pH neutralized to pH=6.5. The load was accepted and discharged without incident.

Los Coyotes WRP Low Dissolved Oxygen Concentration

On Tuesday, 9-22-15 at 0735 hours, Los Coyotes WRP TPO I Ryne Shay, notified Supervising I.W. Inspector Barbara Jenkins that operators had noted low dissolved oxygen levels in the secondary tanks beginning at about 2100 hours the previous evening. Operators believed the material causing the low dissolved oxygen levels was still entering the plant as of 0900 hours on 9-22-15. They reported they had increased the PAC's output to their maximum in response to the condition.

On Wednesday, 9-23-15 Jenkins was contacted by LC WRP Supervising TPO Michael Barker. Barker reported that the WRP was experiencing another drop in secondary tank dissolved oxygen concentrations starting at 1445 hours that day. He stated there were no other plant operation problems. Influent pH was within the normal range and there was no color in the wastewater. Barker also stated the low dissolved oxygen levels from the 9-22-15 incident had returned to normal by 0950 hours on the 23rd and he considered it is likely that the latest low dissolved oxygen levels were occurring in response to a separate slug of high strength waste material coming into the WRP.

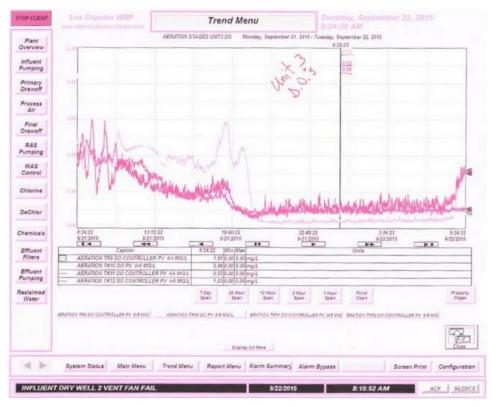


Figure 9: Los Coyotes WRP SCADA system screen shot of dissolved oxygen, PAC, pH and ammonia trends 9-22-15.

Both day and night team I.W. inspectors responded to these incidents led by Senior I.W. Inspector Andy Woods. Fifteen field inspections of previously identified significant chemical oxygen demand (COD) dischargers that could have caused or contributed to these incidents did not identify any as a source for the incidents. Sample analysis results for COD for

samples taken at the WRP essentially found no evidence that any high strength material had entered the plant. Samples tested included; raw composite (595 mg/l), primary grab on 9-21-15 at 2200 hours (473 mg/l), and a sewer grab taken from MH A0157 on the Los Coyotes interceptor trunk upstream of the plant (657 mg/l).

It was noted that when the low D.O. conditions were initially reported on 9-22-15, WRP operators also mentioned the raw influent appeared to be an abnormal (darker) color and had a stronger than usual sewage odor. Due to these observations, I.W. inspectors investigated upstream sewer maintenance activities. Bill Foley, Bill Balas, and Rick Pearce, Supervisors of Sewer Maintenance, reported that there were no ongoing sewer cleaning operations or stop log adjustments upstream of the Los Coyotes WRP. On 9-21-15, caustic shock-dosing was scheduled and performed on the Downey-Bellflower trunk relief, which is tributary to LCWRP. Supervising Engineering Technician Albert Steele reported normal operations and no stop log adjustments during that process. TPO II Mike Nelson reported the expected minor pH fluctuations in the plant influent due to the dosing activity.

On the morning of Wednesday, 9-23-15, Barker reported normal dissolved oxygen and treatment conditions at the WRP. The low D.O. conditions on 9-21-15 and 9-22-15 had no apparent adverse effect on treatment plant effluent. Microorganisms were reported to be functioning normal; there were no turbidity issues. I.W. inspectors will continue to communicate with operators and monitor plant conditions.

INDUSTRIAL WASTE SECTION SUMMARY OF ACTIVITIES FOR THE MONTH OF OCTOBER 2015

TREATMENT PLANT/SEWER/OTHER INCIDENT INVESTIGATIONS

Report of Illicit Sewage Dumping in San Dimas

On Friday, 10-2-15 at 1244 hours, Supervising I.W. Inspector John Boyd received a call regarding a citizen's report of possible illicit dumping into a sewer in San Dimas. The citizen called the Districts to report suspicious activity at the Frank G. Bonelli County Park. He said he was a boarder who had a horse at the horse stables located on the east side of this large L.A. County park. He said that at about noon he had observed a 2000-gallon waste tanker truck operated by "Quality Pumping Service" pull up to a local sewer line manhole adjacent to the stables (see Figure 1), then two men from the truck proceeded to open manhole cover and dump the contents of the tanker into the manhole over a 15-minute period. He said the two men saw him, but did not appear to hurry the discharge or exhibit otherwise suspicious behavior as would be expected if they were conducting illegal activity. After the tanker truck left he went to the manhole location. The manhole cover had been replaced, but he reported seeing a small "wet spot" next to it and what he thought might be some human solid waste debris next to the manhole. He then speculated that the tanker could have been hauling waste from the "RV Park" located nearby inside the park.



Figure 1: GIS diagram of the Frank G. Bonelli Regional Park in San Dimas.

Area I.W. Inspector Peter Carlstrom and Senior I.W. Inspector Steve Sealy responded. Carlstrom arrived on-site at 1400 hours on 10-2-15. He observed the local line manhole where the alleged dumping occurred (see Figure 2). He reported there was a minor amount of what appeared to be horse or animal manure near the manhole (see Figure 3), but nothing else that would constitute a need for a raw sewage spill cleanup. At 1515 hours Sealy called Boyd and reported that their initial investigation had found that a small sewage pumping plant located near the RV Park inside the park had failed due to an ongoing power outage. Apparently, the pumping station is maintained by a private operator under contract to L.A. County Parks and Recreation department. The investigation revealed a manager at the L.A. County Parks headquarters authorized Quality Pumping Service to periodically remove the accumulating wastewater (raw sewage) from the pump station wet well and haul the wastewater to the manhole located by the horse stables and dump it there. Given these findings, no further follow-up was performed or is anticipated.



Figure 2: Local line sewer manhole adjacent to the horse stable area inside the park where the dumping activity was observed by a citizen.



Figure 3: Close-up photo of the local line manhole where the dumping was observed. Note the lack of sanitary sewer solids or debris.

Structure Fire in Vernon

On Monday, 10-5-15 at 0900 hours Senior I.W. Inspector Steve Sealy, while driving to his inspection area, noticed a large plume of black smoke rising from an apparent fire in the city of Vernon, possibly Huntington Park. Upon arrival at 54th and Soto Street, Sealy met with first responders from the Vernon Fire Department and Vernon Health Department Director Leonard Grossberg. The fire, which occurred in a dry warehouse building where fabrics, electronics and other non-hazardous dry good materials were stored, was already under control. There was no evidence any hazardous liquids or chemicals had been stored in or around the warehouse. Firefighting water was allowed to runoff into the storm drain system and it was not anticipated any would be captured for disposal into the sanitary sewer system. Inspection of downstream local sewers found no evidence that any firefighting water had entered the sewer. Although there were a number of permitted industrial waste dischargers in the vicinity (See Figure 4), none were impacted by the fire and there was no impact on Districts' facilities or operations as a result of the fire.

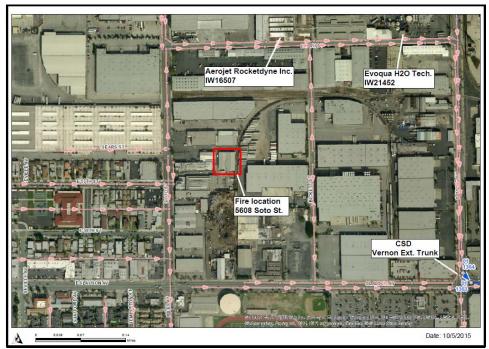


Figure 4: GIS diagram showing the local area and vicinity of the 10-5-15 fire at 5608 Soto St. in Vernon.



Figure 5: Aerial view from local news reports of the 10-5-15 fire in Vernon.



Figure 6: Senior I.W. Inspector Steve Sealy in the field using his iPACS FAST tablet computer to access Districts' Geographic Information System (GIS) and Pretreatment Program data on 10-5-15.

Structure Fire in Unincorporated Los Angeles County West of Huntington Park

On Wednesday, 10-7-15 at 0730 hours, Supervising I.W. Inspector David Sanchez notified Senior Inspector Bill Barnum that he had heard news reports of a large fire in the vicinity of Slauson Avenue and Hooper Avenue in Los Angeles. Initial news reports indicated the fire was located north of Slauson Avenue, which would put the location outside the District's service area.

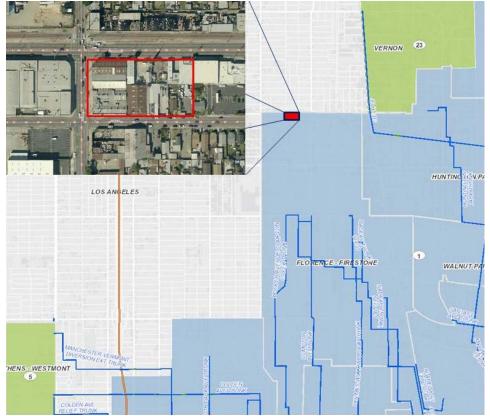


Figure 7: GIS diagram indicating the location of the 10-7-15 fire. Note that it occurred just inside the boundary of District No. 1.



Figure 8: Photo taken by Senior I.W. Inspector Bill Barnum upon arrival at the scene of the 10-7-15 fire that occurred in an unincorporated area of Los Angeles County west of the city Huntington Park known as "Florence."

At 0845 hours Barnum arrived on scene and checked into the command post located on Hooper Avenue south of 58th Place. Barnum determined the fire was within the District's service area with its location south of Slauson Avenue, not north as originally reported (see Figure 7). The Incident Commander, Assistant L.A. County Fire Chief Chris Bundesem, stated the fire started at 0100 hours that morning at a furniture company. The fire quickly spread to surrounding businesses which included a metal fabricator, a mattress company, another furniture company, a masonry supply company, a residence and a bar. A total of five structures were lost and two were partially damaged as a result of the fire. At the time of Barnum's arrival "mop up" on some smoldering hot spots was occurring, but for all intents and purposes the fire had been extinguished. Firefighting water ran off into the storm drain. L.A. County Hazmat Specialists were are on-site taking field tests for pH and metals from the runoff and according to L.A. County Fire Department Health/Hazmat Specialist Gerhardt Trippel all the runoff had a neutral pH (i.e., 7) and no significant readings for heavy metals. As such he anticipated none would be captured for disposal into the sanitary sewer system. Inspection of downstream local sewers found no evidence that any firefighting water had entered the sewer. There was no impact on Districts' facilities or operations as a result of the fire. It was noted that Federal Bureau of Alcohol, Tobacco and Firearms and Explosives agents, as well as the L.A. County Bomb Squad, were on-site investigating this fire due to the recent trend of suspicious fires in the Los Angeles/Huntington Park area.

San Jose Creek West WRP Red Color

On Wednesday, 10-7-15 at 0915 hours San Jose Creek East WRP TPO Leo Castanon notified Supervising I.W. Inspector David Lee that during routine plant rounds he noticed that the water in the raw influent pH box appeared to have a red color to it. He then checked the head end of the primary settling tanks and saw the same red color.



Figure 9: Red color in San Jose Creek East WRP Primary tanks on 10-7-15.

At 0930 hours Lee and I.W. Inspectors Peter Carlstrom and Jonathon Powell toured the influent area of the WRP to assess the situation. No red color was seen in the influent pH box as well as the influent channel just upstream of the primary tanks. However, the water at the head end of the primary tanks had a definite red/pink hue to it (see Figure 9). A sample of the water was collected. There was no color in the water at the back end of the primary tanks, this information indicated the red-colored wastewater was no longer coming into the WRP and was a short slug event.

Inspections conducted at multiple industrial facilities (7) upstream of SJC East WRP failed to identify a definitive source of the red color. Samples of wastewater found at two industrial users did have a somewhat similar color (see Figure 10), but the amount of flow from these dischargers individually would not generally have the ability to cause the WRP influent color. I.W. Inspectors believe that the brief period of red color at the WRP on 10-7-15 was due to a coincidental combination of colored water discharged from multiple sources. The only lasted less than 15 minutes and was not seen beyond the influent building and primary settling tanks. WRP Operators reported no abnormal effects on any treatment processes.

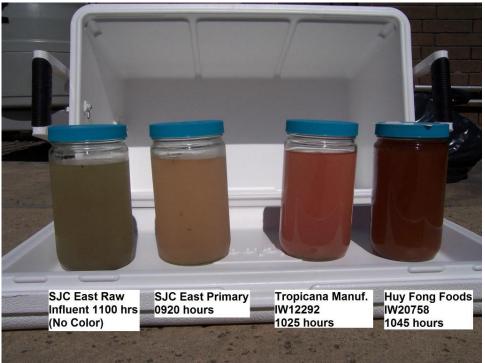


Figure 10: Comparison of samples taken at the SJC-East WRP and upstream I.W. discharge sources on 10-7-15.

JWPCP Kerosene Odor

On Sunday, 10-11-15 at 0120 hours, Supervising I.W. Inspector David Sanchez received a report from JWPCP Supervising Treatment Plant Operator Steve Pearson that operators had noted a kerosene odor in the grit/screenings building at 0100 hours.

Senior I.W. Inspector Bill Barnum responded to the call, arriving on-site at the Primary Treatment Control Room at 0205 hours on 10-11-15. According to Pearson, the kerosene odor causing material came in on the J.O.'A' trunk line. Pearson based this information on an alarm having been detected in the grit/screenings building, with an operator subsequently confirming the presence of a kerosene odor in the building and the observation of black oily material on the J.O. 'A' bar screens. A one liter sample taken from the J.O. 'A' inlet at 0100 hours by operators was examined by Barnum. The sample had no discernable kerosene, petroleum-like or other unusual odor to it, nor did it have an oily sheen or any other indication any oily material was present. Barnum identified material from the bar screens as centrifuge centrate solids from the JWPCP solids processing unit operations which occasionally appear at this location. A similar report of this same material, where it was again mistaken for oily material occurred on 7-30-15 (see "JWPCP Excessive Black Solids" incident investigation in the July 2015 Summary of Activities report). These solids have a remarkable visual resemblance to petroleum-like material (see Figure 11) but they lack a petroleum odor and texture. Barnum found no evidence that any flammable material entered the plant, as the influent LEL sensors all showed very low readings throughout the early morning and prior evening hours. Barnum inspected the two large potential upstream industrial sources, the Phillips 66 and Tesoro (Wilmington) oil refineries, finding no evidence either had discharged any material or had any unusual conditions or incidents that could have resulted in the discharge of fuel-type materials into the sewer. He then returned to JWPCP at 0340 hours to check if any kerosene-like material had made it to the back end of the sedimentation tanks. He found all the sedimentation tanks appeared normal with no sign of an oily sheen in the skimming troughs. Both hoppers were inspected in the grit/screenings building. There was no sign of an oily sheen in the hoppers or a kerosene type odor. All influent parameters were normal and the plant was operating normally. No further investigation was conducted. I.W. Inspectors will remain vigilant for any industrial sources that could have caused the reported odor.



Figure 11: JWPCP Primary skimmer black solids observed on 7-30-15. Note how the solids, which come from the JWPCP Solids Processing Unit appear essentially visually identical to that of a black oily material.

Search Warrant Issuance at Norchem Corporation in Los Angeles

On Tuesday, 10-13-15, Supervising I.W. Inspector John Boyd was notified by Federal EPA Criminal Investigative Division Special Agent Geri Gilbert that on Thursday, 10-15-15 at 0900 hours, a search warrant would be served at Norchem Corporation located at 5649 Alhambra Avenue in the City of Los Angeles. The facility is located on a lot that lies directly adjacent to the City of Alhambra (see Figure 12) but it technically lies outside the Districts service area and thus has historically not been regulated by the Districts. The warrant was issued based on allegations and evidence that the facility is illegally manufacturing and marketing counterfeit laundry detergent products that contain pesticide materials that are subject to the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA). The detergents/sanitizing agents are used by large institutions with laundry operations such as hospitals, nursing homes, and schools. Gilbert initially notified Boyd searching for information about the site. She subsequently requested Districts' I.W. Inspectors join in the warrant issuance. Area I.W. Inspector Jonathon Powell, Senior Inspector Steve Sealy and Supervising I.W. Inspector David Lee participated in the issuance on 10-15-15. I.W. Inspectors performed dye testing during the warrant issuance that confirmed industrial wastewater from the facility was being discharged into an 8" city of Alhambra local sewer line that flows into the Districts' collection system. I.W. Inspectors issued a violation notice to Norchem Corporation for discharging industrial wastewater without a permit. No other details on the results of the warrant issuance are being provided at this time as the U.S. Attorney's office has requested they remain confidential.



Figure 12: GIS diagram showing the location of Norchem Corporation. Note that it lies directly on the border between the Cities of Los Angeles and Alhambra.

Access Denial at Sisley Italian Restaurant in Santa Clarita

On Thursday, 10-22-15 at 1100 hours, Area I.W. Inspector Nguyen Dang notified Supervising I.W. Inspector David Lee that in attempting to perform a restaurant chloride inspection in the Santa Clarita Valley (SCV) at Sisley Italian Kitchen (FID #: 2044162) he was denied access by the restaurant manager. Restaurant inspections where Districts' I.W. Inspectors check for the presence of illicit automatic water softeners at commercial facilities in the SCV are performed regularly. Approximately 200 such inspections are performed annually at such facilities. In the course of two separate visits at this restaurant in October 2015, Dang properly identified himself to the site managers and presented information both verbally and with documentation that authorized him to perform the unannounced inspection. The manager indicated that he had been instructed by the owner to disallow the inspection. Lee instructed Dang to give the manager his (Lee's) contact information and a copy of the Wastewater Ordinance. Dang gave the manager the information and left the site without completing the inspection.

On Monday, 10-26-15 Lee spoke on the telephone with both the restaurant manager, Mr. Scott Spring, and the Owner, Ms. Francine Alba. Ultimately Alba stated that there was no water softener on-site and that no confirmation inspection by Districts' staff was needed. She stated that any insistence on the part of the Districts to conduct such an inspection constituted illegal harassment and that should the Districts persist in their efforts to conduct the inspection she would be making calls to unspecified politicians she knew.

On Tuesday, 10-27-15 at 1445 hours, a meeting was held in I.W. Section Head Dave Snyder's office at JAO to discuss this issue. The meeting was attended by Snyder, Supervising Engineers Bill Cheyne and Larry Smith, Chloride Program Engineer Preeti Ghuman, Dang, Lee and Supervising I.W. Inspector John Boyd. It was determined that Ghuman would draft a letter to Ms. Alba outlining the nature and history of the automatic water softener ban, the chloride inspection/enforcement program, and the fact that a Districts' inspector would be returning to her restaurant in the near future to attempt to complete the required inspection. Her cooperation in allowing this inspection will be requested.

Saugus WRP Ammonia

On Friday, 10-30-15 at 1000 hours, Districts' Water Reclamation Plants Section Senior Engineer Joseph Chang spoke to Supervising I.W. Inspector David Lee regarding information he had just received from Supervising TPO Jeanine Gonzalez regarding a recent increase in ammonia in the Saugus WRP influent. Gonzalez reported that for the past 7-10 days the concentration of ammonia in the plant influent during high flow periods had increased to levels approximately 20-30 ppm higher than normal. This data was based on ammonia probe in the WRP's primary treatment effluent channel which continuously measures and records ammonia concentration. Typically during high flow periods the ammonia concentrations are around 40-50 ppm. Gonzalez reported that at 1000 hours on Friday 10/30 the level was 82 ppm. Additionally, Gonzalez also reported that Districts' Sewer Connection (DSC) Inspector Bruce Jepson had told her that a DSC' crew encountered a strong ammonia odor at 1030 hours the previous day (10/29) at Manhole (MH) 32 1175 on the San Fernando Road Trunk about 4500' directly upstream of the Saugus WRP on Springbrook Avenue.

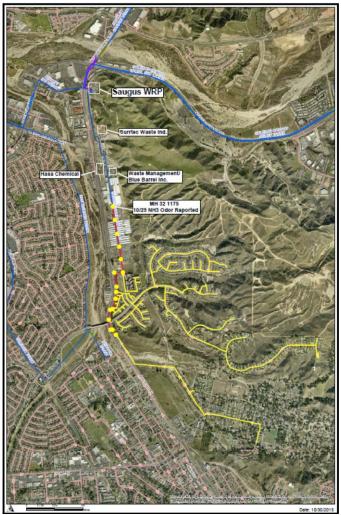


Figure 13: GIS diagram showing the Saugus WRP, areas influent to the WRP, the three major I.W. suspect ammonia sources, Manhole 32 1175 and the area upstream of MH 32 1175.

The I.W. investigation was led by Area I.W. Inspector Anie Kellzi. It included multiple inspections at known industrial wastewater dischargers in the area of the reported odors. The investigation failed to find any evidence of a source. Other than the ammonia odor reported by sewer maintenance workers on 10/29, no other subsequent observations of an ammonia odor were made at this or any other sewer line locations upstream of the WRP despite numerous checks. An internal investigation by Saugus WRP operators using lab analysis for ammonia found that the plant ammonia meter was out of calibration. After recalibrating, the recorded ammonia levels returned to normal. As a result, the plant influent ammonia issue is considered

| resolved. sources. | I.W. | Inspector | s will | continue | to | monitor | the | area | for | any | possible | ammonia | odor |
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INDUSTRIAL WASTE SECTION SUMMARY OF ACTIVITIES FOR THE MONTH OF NOVEMBER 2015

TREATMENT PLANT/SEWER/OTHER INCIDENT INVESTIGATIONS

Elevated Explosivity in the J.O. 'A' Unit 3A Trunk in Carson

On Wednesday, 11-4-2015 at 1250 hours, Albert Steele, Supervising Engineering Technician I at the Compton Field Office telephoned Supervising I.W. Inspector John Boyd and reported that at 1245 hours, technicians had detected 103% LEL using an ATX LEL meter at MH 08A0010 in Carson. Supervising I.W. Inspector David Sanchez was notified of the report and responded.



Figure 1: Map diagram showing JWPCP and the four manholes most frequently reported to I.W. Section staff as having elevated explosivity concentrations as monitored by Compton Field Office sewer maintenance personnel.

Sanchez called John Boyd at 1400 hours on 11-4-15 and reported that he had just arrived at MH A10 and measured only LEL=13% in the manhole headspace. Boyd agreed to contact Steele to verify the location of the reported high LEL. At 1413 hours Boyd spoke with Steele and confirmed the manhole in question was A10, located at the intersection of Bonds St. and Broad St. in Carson. Steele reported his technicians had <u>not</u> opened the manhole at 1245 hours, thus their opening the manhole and allowing the high LEL headspace gases to escape was unlikely as the cause of the LEL reading dropping so precipitously between 1245 and 1400 hours.

Sanchez' subsequent investigation of the area upstream of MH A10 did not find any evidence of activities by industrial wastewater dischargers which could have caused or contributed to elevated combustible gases in the trunk. He also noted there were no other unusual visual conditions or odors, including gasoline or petroleum-like substances, present in the manhole headspace. Analysis of headspace gas samples for previous similar incidents reported at MH A10 have consistently found the explosive gases to be comprised of only methane. This indicates the likely source for the gas is anaerobic biodegradation of raw sewage solids in the line as opposed to being from an industrial source, such as an upstream petroleum refinery. There was no evidence found that this incident was attributable to anything other than methane accumulating in the sewer from biological activity. No further investigation was conducted, but inspectors remain vigilant to these elevated LEL conditions and reports.

Heavy Siphon Greasing on the J.O. 'B' Unit 1E Siphon in Montebello

On Friday, 11-13-15 at 0730 hours, San Gabriel Field Office Sewer Maintenance Superintendent Bill Balas called Supervising I.W. Inspector John Boyd. Balas reported that his crews were encountering increasing amounts of grease at the 21" diameter, approximately 700' long siphon structure located between Manholes B0237 and B0236 on the J.O. 'B' trunk sewer just downstream of the Montebello Town Center Mall in Montebello. This location has previously been the location of two previous excess grease investigations in 2013 and 2014. Balas reports the greasing continues to worsen, such that what had been a quarterly cleaning schedule at the siphon had been increased to monthly, and was now going to weekly, in order to ensure no sewer system overflows occur at the location. Balas stated his crews think it is likely that the FOG sources of the problem are restaurants at the Montebello Town Center Mall.

On 11-13-15 Area I.W. Inspector Ken Hanks and Senior I.W. Inspector Steve Sealy met with Lead Sewer Maintenance Technician Enrique Martinez and his crew at MH B0237. Martinez stated that on 11-6-15, while attempting to clean the siphon with a bag, the bag went less than half the distance down the siphon. He assumed this was due to heavy greasing because the bag came out with some grease on it. But he also stated the bag brought out sand as well. Subsequent efforts to jet and bag the line on 11-12-15 and 11-13-15 were successful in cleaning the line, but large amounts of sand and grit were removed from the siphon (see Figure 3). During these operations only minor amounts of grease were observed. The source of the sand and grit is unclear, but the maintenance crew stated they have some concern that the presence of the sand could indicate a possible structural issue with a sewer line upstream. Hanks also inspected eight restaurants, as well as the Montebello Town Center Mall, which itself includes several restaurants. His inspections found evidence that the city of Montebello is not properly administering a FOG control program. While most of the restaurants have grease traps, many lacked documentation of properly maintaining them.

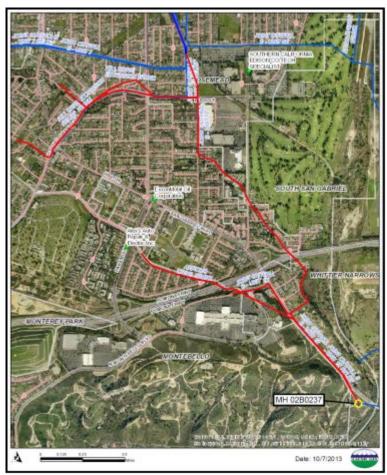


Figure 2: GIS Map indicating the Districts' trunk sewers and Montebello local sewers tributary to the siphon

structure where excessive greasing has been reported several times over the past three years.



Figure 3: Sand and grit removed from MH B0237 on 11-13-15. Note that these particular cleanings did not have much grease present.

On 11-23-15 Sealy spoke with Balas on the telephone. Balas stated the siphon was cleaned again on about 11-20-15 without incident, and without any noticeable grease seen. Balas feels there is no evidence of any structural issues in the sewer; instead he suspects the sand and dirt observed in the line came from ground cover material washing into the sewer from the unpaved areas above the line immediately upstream of MH 02B0237 during recent rainstorms. Sealy also spoke with Danilo Baston, the City of Montebello's Director of Public Works. Baston was informed of the grease problem in the siphon downstream of his city's local sewer lines. He was also told many of the restaurants inspected by Districts' staff did not have receipts for cleaning their grease traps. Baston admitted the city was not implementing a FOG control program and had essentially no contact with its sewer users. He said if a city sewer local line needs cleaning, it's jetted and the blockage materials are pushed downstream into Districts' lines. He acknowledged the city's lines flowing towards the siphon in question have had blockage problems.

I.W. inspectors suspect the sand and grit observed in the line are acting to trap and hold whatever grease is coming down the line from upstream sources. I.W. Compliance staff will meet with City of Montebello representatives to address their need to implement a more effective FOG control program.

Evidence of Illicit Storm drain Discharges in Carson

On Friday, 11-13-15 at 1000 hours, while conducting a routine inspection at an industrial facility, Night Team I.W. Inspector Kristopher McGinnis received a tip that a neighboring company was routinely illicitly discharging their industrial wastewater into a low-lying dirt area that separates the two facilities. McGinnis and fellow Night Team Inspector Tanna Pekin immediately proceeded to inspect the area in question and came upon a large area of approximately several hundred square feet that was covered in what appeared to be sludgy paper pulp waste. The waste ranged from being relatively dry and thin, to extremely wet and several inches deep. A flexible hose used to convey the waste from the source building was also noted and it appeared likely the illicit discharging has been ongoing for months if not years. No illicit discharge was occurring at the time of the inspection, but some of the pulp waste material appeared to be very fresh (see Figures 4 and 5 below). Samples of the material were taken. However the source building, apparently occupied by Berkley International Packaging was not inspected. The company's website indicates they manufacture molded fiber packages. After consultation with Supervising I.W. Inspectors Barbara Jenkins and John Boyd, in which the egregious nature of the findings was noted, it was decided that the situation would be referred to the Los Angeles Regional Water Quality Control Board (LARWQCB) for further investigation and follow-up. The LARWOCB has legal authority over such illicit discharges into the

stormdrain and their investigation may result in legal action being taken against whoever is responsible. The case was referred to the LARWQCB by Boyd on 11-19-15.

Berkley International Packaging 2725 E. El Presidio Street Carson, CA 90810 FID 9249400

Unknown GPD



Figures 4 and 5: Wet paper pulp waste discharged into an open area north of 2725 E. El Presidio Street in Carson, CA. Note black flex hose used to convey the waste in Figure 5.



Figure 6: GIS map showing the area where the sludgy pulp waste was found in the open area north of the building occupied by Berkley International Packaging. The flex hose used to discharge the waste and the start of the waste sludge was located at the area marked as "1". The sludge extended east through the area marked as "2," until it ceased at the area marked as "3."

Lancaster WRP White Foam

On Wednesday, 11-18-15 at 0905 hours, Lancaster WRP TPO II Rafael Rivas called Supervising I.W. Inspector John Boyd. Rivas reported that at 0850 hours WRP operators had noticed moderate amounts of white foam at the flex rake and grit channel chamber (i.e., headworks) of the WRP. Rivas said a sample of the foam was taken. He also reported there were no unusual odors associated with the foam. The information was forwarded to Supervising I.W. Inspector Dave Lee. Area I.W. Inspector Jonathon Powell responded to the report.



Figure 7: White foam in a Lancaster WRP grit chamber on 11-18-15 at 0815 hours.



Figure 8: White foam lingering in the secondary treatment aeration tanks at the Lancaster WRP on the morning of 11-19-15.

Upon being notified of the report of white foam at the Lancaster WRP, Powell immediately realized the likely source was the Northrup Grumman Site 3 aircraft facility in Palmdale. On the previous day, 11-17-15, at 1230 hours, during a routine inspection at the facility, Powell noticed several feet of white foam in an industrial wastewater sampling/monitoring flume vault manhole (IW#14934). Questioning of his contact about the foam revealed it was from the company discharging approximately 20,000 gallons of aqueous film forming foam (AFFF) solution that day to the sewer as part of required testing of the facility's fire suppression system. At the time of the discovery, Powell was unaware the foam would impact the downstream Lancaster WRP. Follow-up by Powell on 11-18-15 resulted in the issuance of verbal warnings to Northrup Grumman for the discharge. It was agreed that any further wastewater generated from testing of the fire suppression system at the facility would be collected and hauled offsite for proper disposal at a centralized waste treatment facility where it would not impact Districts' WRP operations. The fire suppression systems at the facility are required to be tested every 5 years. A sample of the AFFF solution was analyzed using an HPLC and compared to the foam sample taken at the WRP on 11-18-15. Test results indicated a near-exact match, thus confirming the source of the foam found at the WRP.

Northrop Grumman Systems Corporation Aerospace Systems Sector (Site 3) 3000 E. Avenue M Palmdale CA, 93550 IW14934 40,000 GPD



Figure 9: Several feet of white foam noted above the industrial wastewater monitoring flume at Northrup Grumman Site 3 permit location #14934 at 1230 hours on 11-17-15.



Figure 10: GIS Diagram indicating the 15-mile long path the AFFF laden wastewater discharged by Northrup Grumman took to the Lancaster WRP.

High Explosivity in ExxonMobil Torrance Refinery Sanitary Sewer Line

On Thursday, 11-19-15 at 1515 hours, ExxonMobil Torrance Refinery Environmental Advisor Meghana Kumar called Supervising I.W. Inspector John Boyd. Kumar reported that at 1500 hours refinery operators had measured an elevated LEL of 26% in the refinery's main sanitary line which is located just south of and adjacent to the Van Ness outfall (IW#516) line. Kumar said refinery operators were attempting to address the situation by "flushing" the line as has been done previously under similar circumstances. Night Team I.W. Inspectors Tanna Pekin and Kristopher McGinnis were contacted and responded to the report.

Historically there have been elevated LEL readings in this line that were determined to be due to methane generated from sanitary waste settling in and decomposing in the line. The general approach to addressing this issue/problem has been for refinery operators to flush the line with clean water to remove the solids. The Districts has approved this approach in the past.

ExxonMobil Oil Corporation 3700 W 190th Street Torrance CA, 90503 IW 516

4,165,000 GPD

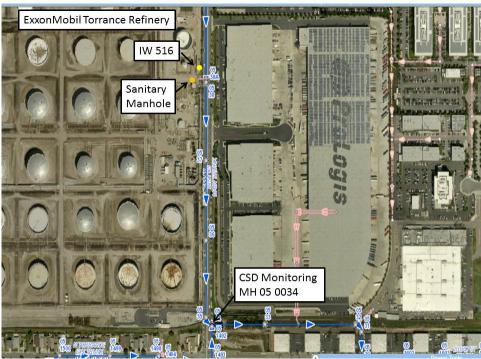


Figure 11: GIS diagram indicating the location of the IW#516 monitoring location ("Van Ness outfall") and the nearby sanitary line manhole where high explosivity was detected on 11-19-15. Note that although very close together, the two connect independently to the adjacent 48" District 5 Main trunk.

McGinnis and Pekin arrived at the ExxonMobil facility at 1545 hours on 11-19-15 and found refinery operators had flushed the facility's main sanitary line with water, reducing the explosivity level in the sanitary line headspace to 17%. No hydrocarbon or gasoline odors were noted in the sanitary line headspace gases. The refinery was operating normally and discharging industrial wastewater through the Van Ness outfall at 2552 gpm. Field tests indicated compliance with industrial wastewater discharge limits. It should be noted that in 2001-2002, over a period of many months high explosivity levels were noted in the District 5 Main trunk sewer just downstream of the ExxonMobil Torrance refinery. An exhaustive investigation eventually traced the source of the explosivity levels to the same sanitary line noted above. ExxonMobil operators determined the source of the explosivity was a leaking underground gasoline product line that was periodically leaking gasoline into the sanitary line, thus causing explosive conditions both in their own sanitary line and in the downstream Districts' trunk. As a result of that incident the facility now checks explosivity levels in the sanitary line weekly. This monitoring has found the occasional high explosivity conditions caused by degrading sewer

solids as noted above. There was no evidence found during this current incident that the high explosivity level noted was due to similar conditions as occurred in 2001-2002.

The company contact stated the sanitary manhole is now being checked daily and if the LEL is close to or exceeds 10%, the sanitary line will be flushed with water. A daily log of these LEL readings showed three flushes had occurred in November 2015, including the 11-19-15 incident.

ExxonMobil will investigate the elevated LEL in their sanitary line since this unusually high LEL has been occurring over the last two weeks. They will confirm whether or not a separate issue may be occurring in the sanitary line besides accumulated sanitary waste.

INDUSTRIAL WASTE SECTION SUMMARY OF ACTIVITIES FOR THE MONTH OF DECEMBER 2015

TREATMENT PLANT/SEWER/OTHER INCIDENT INVESTIGATIONS

Fruit Juice Spill at Tropicana Manufacturing in the City of Industry

On Wednesday, 12-2-15 at 1615 hours, Supervising I.W. Inspector II John Boyd telephoned night team Supervising I.W. Inspector I Barbara Jenkins to report that Eddie Zuno, Health, Safety and Environmental Associate Manager of Tropicana Manufacturing Company in the City of Industry had telephoned him at the request of LACSD I.W. Engineering Associate Jaime Badia. Zuno reported that on Tuesday, 12-1-15 a leak had been discovered at their "green juice machine" that had caused about 30,000 gallons of apple juice to be lost to the sewer.

Tropicana Manufacturing Company IW 12292 400,000 GPD 240 N. Orange Ave.
City of Industry, CA 91744

On12-2-15, night team I.W. Inspector Kris McGinnis and then following day, Area I.W. Inspector Pat Cashen, investigated Tropicana's self-report of losing approximately 20,000-30,000 gallons of various mixed fruit juices to the sewer over a 2-3 day period from November 29th-December 1st. Tropicana immediately shut down the juice line when the leakage was discovered after an internal investigation was completed. The investigation was prompted by Tropicana operators noting that the expected quantities of mixed juice batches were not being packaged. The company investigation revealed that a valve on the blending equipment, specifically an interior valve inside the filler bowl on line #2, was stuck partially open allowing juice to leak/drain into the company's industrial wastewater treatment system through production area floor drains. Typically line # 2 fills 10-ounce and 15-ounce juice bottles. This filler bowl had been recently serviced during the company's 11/21/15-11/29/15 annual routine preventative maintenance shutdown period. Apparently, the valve in question wasn't reassembled correctly, causing a seal inside the valve to fail, thus causing product juice to leak into a floor drain instead of going to the filler line. Tropicana ultimately estimated 29,000 gallons of a mixture of apple, orange and banana juice was lost. All of the lost juice drained slowly to the company's pretreatment system where it initially got stored in equalization tanks, was then pH neutralized, and finally after solids removal, discharged to the sewer.

Examination of Tropicana's required industrial waste discharge pH chart recorder during the period when the leak was occurring found no evidence any low pH discharges occurred. Apparently the pretreatment pH neutralization was able to effectively neutralize any acidic juice that might have otherwise have been discharged to the sewer. However, McGinnis did note the company had improperly shut off the effluent pH recorder during the maintenance period from 11/21-11/29, and had failed to properly annotate the recorder chart. Verbal warnings were issued to the company for these violations. TPO II Michael Phan at the San Jose Creek East WRP was contacted on 12-2-15. SJC-East is the downstream WRP for the Tropicana facility. Phan reported that no unusual influent pH or other conditions related to the possible receiving of high strength waste had occurred over the previous 7 days (11/26-12/2). Thus, it does not appear the mixed fruit juice release from Tropicana adversely impacted WRP operations.



Figure 1: Tropicana filling line #2 filler bowl manifold. Note the location of the internal valve that failed and the floor drain immediately beneath that received the leaking juice.

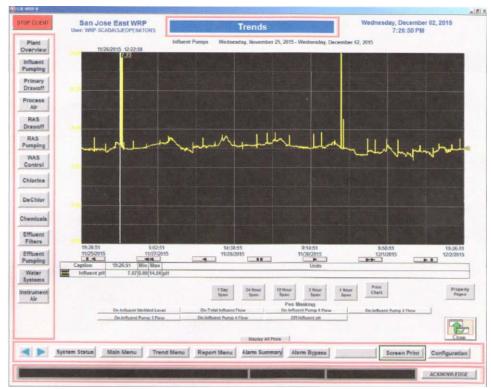


Figure 2: SJC East WRP Influent pH trend for 11/25/15-12/2/15. Note the lack of any significant low pH readings.

JWPCP Excessive Black Solids

On Friday, 12-11-15 at 0720 hours, JWPCP STPO II Gus Caro called Supervising I.W. Inspector John Boyd and reported that the previous day on Thursday, 12-10-15 at 1230 hours operators had noticed excessive amounts of "black, oily/slick, foamy" solids material in the primary skimmer screens. Influent pH and explosivity levels were at normal levels, and there were no unusual odors noted at the time. Caro said he never-the-less believed the material seen was from a petroleum source. When asked by Boyd if the material could be from the JWPCP solids processing unit (as investigations of two very similar incidents determined occurred in the last 5 months), Caro stated he didn't think so, because "we would know about it if that were the case."

I.W. Inspectors Shawn Cleaver, Tingting Wei, and Chris Mendoza investigated the report. A sample of the solids taken from the primary skimming screens on 12-11-15 at 0600 hours was examined by inspectors at the JWPCP lab sample receiving area. The material was a black, gritty, "mousse-like" substance that had no definite odor or oily characteristics. The sample was then compared to a similar sample taken during a very similar incident at the same location on 7-30-15 that involved black solids clogging inlet screens at the Joint Plant (see Figure 3). Visual and tactile comparison of the two samples showed that the two materials had very similar characteristics and probably had the same origin. In both cases the material appears to be thickened centrate from the JWPCP's solids processing unit. A portion of the screen sample taken on 12-11-15 was analyzed for "percent volatile solids" using the standard protocol for thickened centrate. A second portion of the sample was compared using microscopy to a 12-11-15 sample of thickened centrate acquired by the JWPCP lab (see Figure 4). The samples microscopically matched and the percent volatile solids analysis clearly indicated the 12-11-15 sample did not correlate with petroleum based material, instead it matched that of a sample of thickened centrate.

TPO II Paul Johnson, in solids processing, examined photographs of the sludge sample and stated that the material looked like thickened centrate. He also stated that on the morning of 12-10-15 experiments were being conducted at the DAF unit involving polymer dosage that resulted in poor solids separation at the DAF flotation tanks and subsequent solids overflow to the J.O. "A" headworks (see Figure 5).

It was concluded that what was described as black oily solids found in the primary skimmings screens by plant operators on 12-11-15 did not have an industrial waste origin, nor were they a petroleum based material. Instead the material was thickened centrate that overflowed into the J.O. 'A' trunk and headworks from the JWPCP solids processing unit. This is also what occurred during a similar incident on 7-30-15.



Figure 3: Visual comparison of 7-30-15 and 12-11-15 samples of JWPCP primary skimmings solids both reported as having a black "oily" appearance. Note their similarity.

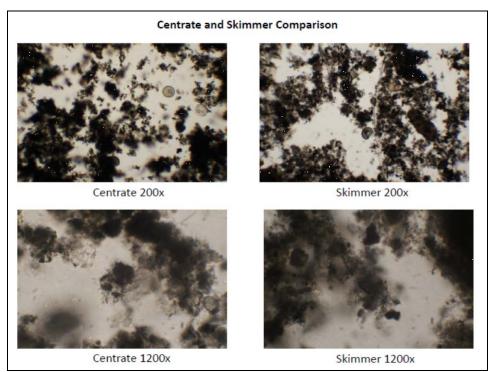


Figure 4: Microscopic comparison of the JWPCP solids processing unit thickened centrate taken on 12-11-15 with primary skimmings with the black "oily" appearance taken that same day. Note: their essentially identical appearance.

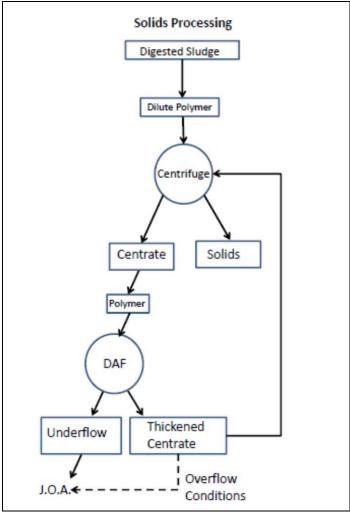


Figure 5: Diagram showing how JWPCP Solids Processing Unit thickened centrate solids can overflow and reach the JWPCP J.O. 'A' headworks.

Lancaster WRP Cleaning Agent Odor

On Monday, 12-21-15 at 1520 hours, and then again on Tuesday, 12-29-15 at 1424 hours, Lancaster WRP TPO II Rafael Rivas called Supervising I.W. Inspector John Boyd. Each time Rivas reported that at within 30 minutes prior ,WRP operators had noticed a "cleaning agent odor, like simple green" or "soap or detergent" coming off the primary tanks and grit chambers at the WRP. Operators took samples of the wastewater thought to contain the odorous material.

Area I.W. Inspector Jonathon Powell investigated the reports. Follow-up information obtained by Powell from WRP operators indicated that for each incident the odorous material had no adverse or unusual impacts on WRP operations such as causing foaming in the aeration tanks, inhibiting or impacting secondary treatment biological activity, or impacting final effluent quality.

Powell's investigation centered on the major industrial wastewater dischargers upstream of the WRP. He determined that the likely source of the odors was the periodic discharge of wastewater generated from a soap and detergent manufacturing operation at the California State Prison in Lancaster (see Figure 6). Normally the wastewater generated from the prison's Prison Industry Authority or "P.I.A." soap and detergent manufacturing operation is blended with the sanitary flow from the prison which tends to dilute any soap/detergent odors. However, a recent reduced inmate population has reduced the sanitary flow, thereby decreasing the dilution effect of sanitary flow on the P.I.A. industrial wastewater discharge. As a result of this incident, the prison is being required to reduce the discharge rate of the P.I.A. industrial wastewater to allow

better dilution. The prison was issued a verbal warning on 12-30-15 for discharge adversely impacting Districts' sewerage facilities.

California State Prison-Los Angeles County IW 13061 385,000 GPD 44750 60th Street West Lancaster, CA 93536



Figure 6: 2004 photo of the Prison Industry Authority soap and detergent manufacturing facility at the Lancaster State Prison facility.