2014 ANNUAL REPORT

INDUSTRIAL WASTE PRETREATMENT PROGRAM

COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

GRACE ROBINSON HYDE
CHIEF ENGINEER AND GENERAL MANAGER

SUBMITTED
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APPENDIX H
INDUSTRIAL WASTE REPORTS ON INCIDENTS

2014 SUMMARY OF TREATMENT PLANT INCIDENTS

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	0	0	0	0	0	0	0	0	0	1	0	0	**1**
Metals/ Cyanide	0	0	0	0	0	0	0	0	0	0	0	0	**0**
Toxicity	1	0	0	0	0	0	0	0	0	0	0	0	**1**
pH High	0	0	1	0	2	0	1	0	0	0	0	0	**4**
pH Low	0	0	0	0	2	0	0	0	0	0	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	3	0	0	0	0	0	0	0	0	0	0	0	**3**
NDMA	0	0	0	0	0	0	0	0	0	0	0	0	**0**
Color	0	0	0	2	0	1	2	0	1	0	0	0	**6**
Foam	0	0	0	0	0	0	0	0	0	0	0	0	**0**
Chloride	0	0	0	0	0	0	0	1	0	0	0	0	**1**
Odor	0	1	0	0	0	0	0	3	0	0	0	0	**4**
Ammonia	0	0	0	0	0	0	0	0	0	0	0	0	**0**
Sulfides	1	0	0	0	0	0	0	0	0	0	0	0	**1**
Tri Halo Methane	0	0	0	0	0	0	0	0	0	0	0	0	**0**
Total	**5**	**1**	**1**	**2**	**4**	**1**	**3**	**4**	**1**	**2**	**0**	**0**	**24**

2014 PUMP PLANT INCIDENTS INVESTIGATED	
EXCESS FLOW	1
PERSONAL WIPE RAGGING	0
OTHER RAGGING	0
FLAMMABILITY/LEL	0
COLOR	0
ODOR	2
CORROSION	0
EXCESS MAINTENANCE	2
OILY SLUDGE	1
TOTAL	**6**

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

2014 SURFACE DISCHARGE INCIDENTS INVESTIGATED	
IU - SPILL	5
RIVER SPILL/DUMP	2
FUEL/SOLVENT	0
CHEMICAL/PAINT SPILL	1
SEPTIC WASTE DUMP	0
GROUNDWATER CONTAMINATION	0
NUISANCE DISCHARGE	2
Total	**10**

2014 SEWER INCIDENTS INVESTIGATED	
Elevated H2S reported by Sewer crew	2
ODOR- Sulfide	0
ODOR-Other	2
FIRE INVESTIGATION: Non-refinery	1
FOAM	0
OIL/FUEL/SOLVENT	0
RAGGING	0
EXCESS SOLIDS	0
SCALE	0
Elevated LEL reported by sewer crew	30
HIGH pH	1
CORROSION	0
RAINWATER	0
COLOR	1
BLOCKAGE/SSO Due to Grease	2
BLOCKAGE/SSO Not due to Grease	6
ILLEGAL ACCESS TO MANHOLE	0
EXCESS FLOW	0
ILLEGAL DUMP	0
MISC.	1
Total	**46**

2014 SUMMARY OF INCIDENT REFERRALS											
Nature of Incident											
Caller ID	Industrial User off-spec or non-permitted discharge			IU Equipment Malfunction	Odor Reports	Refinery Fire or impound of off spec waste reports	Sewer Excess Flow	Misc. Haz or Non-Haz Sewer Discharge	Non-Refinery Fire	Non-sewer related incidents	**Total**
	Acid	Oil	Misc								
IU Release	2	0	22	16	1	9	3	0	0	1	**54**
IU SMR Call	2	0	9	0	0	0	1	0	0	0	**12**
Public Agency	0	0	7	1	2	0	0	10	0	3	**23**
IWMC or CSD	59	0	2	0	0	0	0	1	0	0	**62**
Citizen	0	0	0	0	1	0	0	1	0	0	**2**
Anonymous	1	0	3	0	2	0	0	0	0	2	**8**
News Report	0	0	0	0	0	1	0	0	1	0	**2**
Total	**64**	**0**	**43**	**17**	**6**	**10**	**4**	**12**	**1**	**6**	**163**

2014 LIQUID WASTE DISPOSAL STATION REFERRALS									
	EXCESS SOLIDS	EXCESS GREASE	IRREGULAR RECORDS	LOW/HIGH pH	EXCESS TDS	SUSPICIOUS ACTIVITY	INAPPROPRIATE SOURCE	MISC.	**TOTAL**
Attendant calls for assistance or investigation	0	0	2	17	22	1	2	0	**44**

INDUSTRIAL WASTE SECTION
SUMMARY OF ACTIVITIES
FOR THE MONTH OF JANUARY 2014

TREATMENT PLANT/SEWER/OTHER INCIDENT INVESTIGATIONS

Excessive Sulfides in the Chino Basin Wastewater Line

On Thursday, 1-9-2014 at 1615 hours, Supervising Pretreatment and Source Control Inspector Craig Proctor with the Inland Empire Utilities Agency (IEUA) sent John Boyd an email reporting that on 1-9-14 at 1515 hours an IEUA technician had measured a dissolved sulfide concentration of 0.3 mg/l at the east end monitoring manhole location (dissolved sulfide limit=0.1 mg/l). On Thursday, 1-16-14 at 0827 hours, Proctor again emailed John Boyd and reported that testing of wastewater earlier that morning at the same location had again found a high dissolved sulfide concentration, this time at 2.5 mg/l.

Since 1-7-14 IEUA has been testing a new flow-paced ferric chloride dosing system for controlling sulfides in an attempt to save money by reducing ferric chloride usage without compromising compliance with the Sanitation Districts' imposed dissolved sulfide limit. In both the 1-9-14 and 1-16-14 incidents, IEUA increased the ferric dose rate to reduce the sulfide concentration as quickly as possible. In each case the sulfide concentration quickly returned to non-detect levels. As a result of these two exceedances, IEUA has switched back to the old dosing system which continually doses at a constant feed rate.

JWPCP Liquid Waste Disposal Station Rejected Load

On Friday, 1-10-14 at 1140 hours, JWPCP LWDS Attendant Paul Adams called John Boyd and reported that a 1000-gallon load of purported portable toilet waste hauled to the LWDS by S & S Construction Inc. was being rejected due to the load having a very unusual appearance. Although the load pH and TDS were within guidelines (pH=7.5 and TDS=2240) the load was extremely black and thick with a "glassy and slimy" appearance and an oily odor. He stated that there was "no way" the load was portable toilet waste as represented on the waste manifest completed by the company. The company driver insisted that it was portable toilet waste but could give no explanation as to why the appearance and physical characteristics were so unusual.

At 1433 hours on 1-10-14, Pomona LWDS Attendant Sarah McGee called John Boyd to report the load rejected earlier that day at the JWPCP LWDS was now at her station. The driver of the truck told McGee they had made a mistake on the original manifest which indicated the load was 100% portable toilet waste. The driver said the load was actually about 80% septic tank waste and 20% portable toilet waste. The driver was attempting to hand McGee the completed load rejection forms and then discharge the load at her station. Boyd told McGee to convey to the driver that the proper procedure to follow at this point is to have his company FAX the completed rejected load forms to Boyd at JAO. Boyd would then evaluate the forms and make a decision, in concert with Sanitation Districts' LWDS Program Administrator David Sonboli, whether or not the load would be accepted. McGee conveyed this information to the driver who agreed and left the station without dumping the load. Boyd then called the JWPCP LWDS and spoke with Attendant Fred Stalie. Stalie had been on-site earlier in the day and had seen the rejected load. When asked if the explanation that the load was 80% septic tank waste and 20% portable toilet waste seemed plausible, Stalie affirmed that was exactly what the load looked like. Given this, it appeared very likely the rejected load would be accepted if the rejected load forms were properly submitted and the load returned to a LWDS. However, no rejected load forms were ever received by the Sanitation Districts it appears the load was ultimately taken to a LWDS outside of the LACSD's jurisdiction for disposal.

Orange County Chemical Supplies Acid Waste Discharge Tip

On Monday, 1-13-14 at 1531 hours, Environmental Protection Specialist Richard Kallman with the City of Santa Fe Springs Fire Department emailed John Boyd and reported that he had earlier that day spoken with a recent ex-employee of Orange County Chemical Supplies (OCCS) in Santa Fe Springs. The anonymous ex-employee alleged that OCCS was dumping un-neutralized acidic industrial wastewater into a sewer drain at their site. Kallman and I.W. Inspector Jason Finn performed a joint site inspection at the OCCS facility on 1-16-14. OCCS primarily manufactures soaps and detergents used in the commercial car washing industry. The inspection found no evidence of any illicit or improper discharges having occurred. All required discharge logs and wastewater control mechanisms were in-place and well maintained. No further investigation is anticipated.

Orange County Chemical Supplies IW 21334 80 GPD
13744 Excelsior Ave
Santa Fe Springs, CA 90670

Surface Spill at Alta Dena Dairy in the City of Industry

On Wednesday, 1-16-14 at about 1500 hours, I.W. Inspector Anie Kellzi received a voice mail message from interim EH&S Manager Mary Russell of the Alta Dena Dairy in the City of Industry. Russell reported that a surface spill occurred during the night production shift on 1-14-14. According to Russell, a sump pump malfunctioned causing an overflow of an unknown amount of wastewater, with approximately 50 gallons of the overflow reaching a nearby street. Area I.W. Inspector Anie Kellzi investigated.

Alta Dena Certified Dairy LLC IW 15183 325,000 GPD
17637 E. Valley Blvd
City of Industry, CA, 91744

Company is a large dairy processing operation that processes fluid milk products. According to the contact a small sump pump located outside the cold storage warehouse loading dock malfunctioned. This sump mostly receives warehouse wash down water. Due to the failure, an estimated 50 gallons of wastewater overflowed into the street by the guard shack and dissipated. The contact claimed the street and the storm drain were checked in the morning, but nothing was observed. No further cleanup was required or conducted. There was no impact on Sanitation Districts' facilities or operations from the incident.

Tip Regarding Illicit Discharge of Industrial Wastewater in Compton

On Friday, 1-17-14, a US EPA Criminal Investigator received a tip alleging a metal finishing company in the City of Compton is illicitly discharging untreated industrial wastewater into a sump located at the back of their facility in violation of the requirements of their industrial wastewater permit. In response to this tip, John Boyd was notified by the US EPA and the Sanitation Districts was requested to conduct surveillance sampling at the facility. Surveillance sampling was conducted from 1-25-14 to 1-26-14. Sample results are pending. Further surveillance sampling events are likely to be conducted in February 2014 as this investigation proceeds under the direction of the US EPA.

Chemical Odor in Vernon

On Tuesday, 1-21-14 at 0700 hours John Boyd received an email sent at 2230 hours on Friday, 1-17-14 by Long Beach Main Pumping Plant Operator Kenneth Hartnett. Hartnett reported that he had received a call from L.A. County Health Inspector Lyndon Ongyiu, where it

was reported that recently residents in and around the 2000 block of East 51st Street and Alameda Street in Vernon were complaining of a chemical odor emanating from the sewers. Ongyiu said his investigation, which included the City of Vernon Fire Department, identified a plastics manufacturer located at 2111 East 51 Street, as the source of the odor. Ongyiu stated that the company had "illegally tapped his lateral with their process cooling towers and were dumping into the sewers, inferring that this was causing the odors. Evidently the company was made to remove the connection to the sewer lateral and the odors had been eliminated. Area Inspector Ken Hanks conducted further follow-up on the situation to verify the facts and ensure that the problem was properly resolved.

Pan American Plastics Inc. FID 9247917 0 GPD
2111 E. 51st St.
Vernon, CA 90058

Hanks verified the cause of the sewer odors was from the ABS plastic extrusion single-pass cooling water being discharged by Pan American Plastics using an illicit 4" drain connected at a ladies restroom drain. The company was ordered to halt the discharge and disconnect the illicit drain by City of Vernon Fire prior to any Sanitation Districts involvement. Hanks informed the company that the discharge of single-pass cooling water is prohibited by the Sanitation Districts. It is likely the company will opt to install a cooling tower or chiller unit to address the situation. Further follow-up may be needed if the company ultimately proposes to discharge cooling tower bleed, which is generally allowed by the Sanitation Districts, to insure the odor problem doesn't recur. As noted above, the odors reported by residents and nearby industrial tenants halted once the Pan American Plastics discharge ceased. There have been no sewer odor complaints reported since.

Saugus WRP Fluorescent Green Color

On Friday, 1-17-14 at 1040 hours I.W. Engineer David Sonboli notified John Boyd that he had just received a report of green color present throughout the Saugus WRP from WRP Superintendent of Operations Brian Gifford. The color was first noticed in the plant during operator's rounds at 1000 hours. It was not noted during rounds at 0700 and 0800 hours. Plant influent pH was normal. Dissolved oxygen levels in the secondary aeration tanks were also normal, indicating the colored material is likely non-toxic. There are no unusual odors associated with the color. Gifford stated WRP operators were contacting Sanitation Districts' and local agency sewer maintenance personnel to see if any were doing sewer dye testing today which could account for the color. WRP lab personnel were instructed to keep all primary effluent sample buckets for the last day for possible use in testing and determining a time-frame for the material entering the WRP.

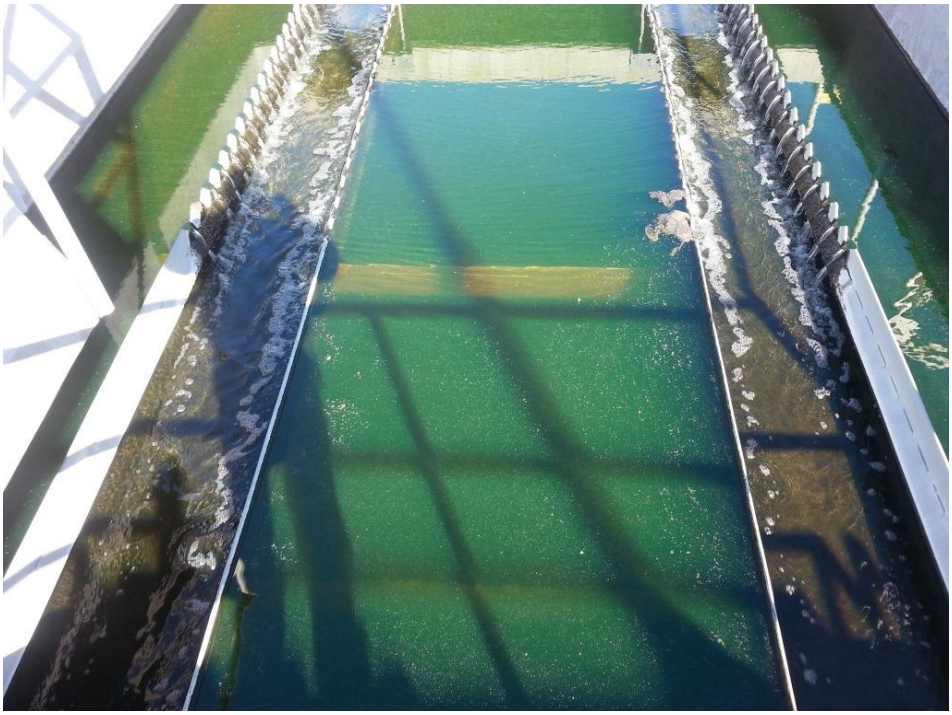

Figure 1: Fluorescent green colored water in the secondary settling tanks at the Saugus WRP on 1-17-14.

Inspections conducted by I.W. Inspectors Peter Carlstrom and James McCurdy at suspect source facilities upstream of the Saugus WRP failed to identify a source. Initially thought to be caused by a fluorescein dye, contact was made to local sewer agencies inquiring about possible pipe tracing activity, but none were reported. Lab analysis of the WRP sample failed to conclusively show the color was in fact fluorescein. No evidence was found of any possible colored discharges at the Saugus liquid waste disposal station. An internet search found a possible manufacturer of fluorescein dyes used for medical purposes located upstream of the WRP. Such a manufacturer was the source for a very similar series of green color incidents at the Whittier Narrows WRP in 2008. However a site inspection at the facility confirmed that it does not discharge any industrial waste. No reports of color at the Saugus WRP have been received since the 1-17-14 incident. The incident did not result in an NPDES violation. I.W. Inspectors will continue to be vigilant for possible sources.

Smoking Manhole in Norwalk

On Wednesday, 1-22-14 at 1201 hours, Compton Field Office Supervisor of Sewer Maintenance William Foley called John Boyd and reported that one of his Maintenance Technicians, Jose Munoz, upon opening a Sanitation Districts' trunk sewer manhole in Norwalk to change out the carbon in an activated carbon odor control canister, had noted that the silicone sealant they were applying on the edges of the manhole cover and ring were "smoking". Munoz was concerned there may be something in the manhole headspace atmosphere that was reacting with the sealant and Foley requested an I.W. Inspector go to the location to investigate. Boyd contacted Senior I.W. Inspector Juan Sanchez, who, along with I.W. Inspector Steve Lajkowicz, met Munoz on-site at 1300 hours.

Figure 2: MH 02 F 0086 on the J.O. 'F'-unit 4 trunk in Norwalk where the unusual smoking effect was observed.

Sanchez found that the manhole in question was the only one where sealant was applied, with the smoking effect not observed at any of the other 5 or 6 manholes the crew had worked on that day. After requesting that the crew replicate their actions, Sanchez observed that the manhole's chimney was quite moist all the way from the top to the bottom and that as air wafted over the rim, small amounts of water vapor could be seen condensing around the manhole's ring. When applied, the caulking material appeared to generate its own "vapor," but this effect could be attributed entirely to the water vapor condensing around the rim. No unusual odors were present and no discoloration of the sewage was evident. Measurements for explosivity indicated only background levels. After reviewing the field findings, it was determined that the "smoke" was water vapor escaping the manhole's chimney and condensing at the rim. This became more evident as the fresh granular activated carbon (GAC) was placed into the basket canister at which time the "smoke" ceased totally. There is no evidence that the unusual water vapor visual effect was associated with any industrial sources or that it had any deleterious effects.

<u>Tip Alleging Toxic Illicit Discharge in Santa Fe Springs</u>

On Thursday, 1-23-2014 at 0915 hours, John Boyd was called to the JAO lobby where he met with a man who asked to remain anonymous. The man stated he was reporting a company in Santa Fe Springs for the illicit discharge of toxic liquid into the sewer. He identified the company as Jarrow Industries, a vitamin and pharmaceutical manufacturing operation. He said he wanted to "blow the whistle" on the company for illegally and knowingly discharging toxic solution to the sewer. He alleged that a leaking dehumidification system ("Kathabar System") located on the second floor of the Jarrow building had caused "highly toxic" lithium chloride solution to be discharged to the sewer via a floor drain and downstream sump pump. He claimed it was leaking at a rate of about 100 gals/month into the sewer as the system's holding/recirculation tank had cracks and lacked proper spill containment. He then alleged managers at the company were aware of the situation and actively ignoring it. The tipster stated the leaking solution had corroded the concrete floor and steel support beams underneath the Kathabar system creating a danger of the second floor collapsing. He said that prior to coming to the Sanitation Districts he had also gone to the City of Santa Fe Springs earlier in the morning and made the same report to Wayne Morrell, the City's Director of Planning. Boyd told

Mr. Sanchez the Sanitation Districts would look into his allegations and take appropriate enforcement and corrective actions if warranted. Area I.W. Inspector Jason Finn investigated.

Jarrow Industries IW 20742 2000 GPD
12246 Hawkins St.
Santa Fe Springs, CA 90640

On 1-24-14 Finn conducted an inspection at Jarrow Industries. The company is regulated by the Sanitation Districts under the Federal pharmaceutical manufacturing category (40 CFR 439). Finn verified that it appeared small amounts of the kathene lithium chloride solution had been being discharged to the sewer and that this material wasn't listed on the company's industrial wastewater discharge permit. However, per Sanitation Districts' Monitoring Section Supervising Engineer Ann Heil, the lithium chloride kathene solution presents no toxicity risk and is essentially an unregulated material with no applicable limits as to its discharge into a municipal sewer system. As a result, the company was given a verbal warning violation by Finn and told to cease any discharge of the kathene solution into the sewer. Should the company propose to discharge small amounts of the Kathene solution by filing a permit addendum application, it is unlikely the Sanitation Districts will either prohibit its discharge or require the Kathabar system tank(s) be spill contained. Lastly, although a minor amount of rust was found on the Kathabar system steel supports, nothing approaching corrosion damage in amounts necessary to pose a risk of the structure failing was observed on the steel or on the concrete underneath.

JWPCP High Explosivity in the J.O. 'A' Headworks

On Wednesday, 1-29-14 1409 hours, JWPCP TPO II Mike Hernandez notified Senior I.W. Inspector Bill Barnum of elevated combustible gases (LEL) at JWPCP in the J.O. 'A' headworks headspace. LEL trends indicated the high LEL condition began at 0800 and continued into the afternoon. The LEL reading peaked at 26% at 1400 hours. Barnum inspected the headworks and reported it appeared normal with no hydrocarbon sheen nor any other unusual visual or odor characteristics.

No source for the elevated LEL was found. I.W. Inspectors inspected a total of eight companies on 1-29-14 and 1-30-14, including all those large dischargers, such as those conducting petroleum refining and processing operations, that are known to be capable of discharging wastewater in the quantity and quality required to impact LEL conditions at the J.O. 'A' headworks. No evidence was found to indicate any of these facilities caused the incident. Inspectors also investigated additional potential sources of the high LEL, including the JWPCP Liquid Waste Disposal Station, and the JWPCP solids centrate handling area where the dissolved air floatation unit underflow enters the sewer and has been confirmed as the source of high LEL at the J.O. 'A' headworks in the past. None of these areas reported unusual activity and the centrate underflow diversion manhole was field tested by Barnum and had a 10% LEL at 1415 hours on 1-29-2014. At that same time Barnum found that the J.O. 'A' headworks had 26% LEL as measured with his Gastech GP-204 meter, which was the same as the plant sensor reading. At 2300 hours on 01-29-2014, night team I.W. Inspector Andy Woods reported that the J.O. 'A' headworks LEL had dropped to 9.9%. I.W. Inspectors will continue to be vigilant for possible sources.

San Jose Creek West WRP High pH

On Wednesday, 1-29-14 at 0700 hours, San Jose Creek Supervising TPO Jeff Valdes notified I.W. Inspector Pat Cashen that at about 0300 hours the influent pH at the West WRP began rising, eventually reaching 9.4. WRP operators collected a sample of the high pH influent and described it as having a milky white color. This color, coupled with the high pH reading, is

typically indicative of ongoing sewer crown spray activity occurring upstream of the WRP. However, in this case, WRP operators were unaware of any such crown spraying activity and the time this was noted wouldn't be typical for when crown spraying is conducted. There were no reported effects to any other aspect of the treatment process and the plant appeared to be operating nominally. The pH remained elevated until about 1000 hours, at which time it returned to normal levels).

Supervising I.W. Inspectors Dave Lee and Cashen reviewed sewer crown spray notification emails finding that although trunk sewers upstream of the West WRP were scheduled for crown spraying the work wasn't to be done until later in the day on the 29th. However, subsequent communication with the crown spray contractor representative confirmed that they had conducted the crown spraying starting after midnight on the 29th to work around heavy traffic present later in the day. Given this, it appears the early morning incident of high pH influent at SJC West WRP was caused by overnight crown spray work in the sewers upstream of the plant. Lee suggested to the contractor that if they were going to alter their work schedule, as occurred here, they need to include that information in the daily notification emails as well. The contractor said he would attempt to do that.

<u>Signal Hill Outfall Trunk High Explosivity in Long Beach</u>

On Thursday, 1-30-14 at 1400 hours, Compton Yard Supervising Engineering Technician Albert Steele called John Boyd and reported that at 1358 hours his technicians had detected LEL=33% in the headspace of Manhole 29 0011 on the Signal Hill Outfall trunk sewer in Long Beach.

Night Team Senior I.W. Inspector Kent McIntosh arrived on-site at 1550 hours on 1-30-14 and was quickly able to determine the source of the high explosivity was the discharge from Oil Operators, a large facility that processes and discharges oil-field brine water for independent oil producers in the Long Beach/Signal Hill. The investigation revealed that the LEL was caused by methane entrained in the discharge that was present due to insufficient treatment to remove it. McIntosh issued a notice of violation to Oil Operators for the violating their LEL limit of 20% (he measured 60% at their outfall at 1555 hours) and for causing an explosion hazard in the sewer. He ordered the company to cease their discharge until they could insure all discharge limits would be met. The company complied with the requirement.

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

On 1-31-14 the company began discharging their waste brine though an alternate sewer connection (sampling location 14694A) where they believe there is more opportunity for the methane entrained in the flow to be liberated prior to discharge, thus allowing them to comply with the LEL limit and prevent creating an explosion hazard in the downstream sewer system. Inspection at this alternate location found LEL=17% at 2340 hours on 1-31-14. A compliance meeting with the company has been called for 3-4-14 due to the violations and it is expected Oil Operators will propose installation of improved pretreatment facilities to insure compliance with all limits when discharge is ultimately resumed at the 14694B sampling location/connection.

INDUSTRIAL WASTE SECTION
SUMMARY OF ACTIVITIES
FOR THE MONTH OF FEBRUARY 2014

TREATMENT PLANT/SEWER/OTHER INCIDENT INVESTIGATIONS

Pomona WRP high pH

On Tuesday, 2-4-14 at 1425 hours, TPO II Mike Mulvihill at the Pomona WRP called John Boyd and reported that a high pH slug of milky white wastewater had just come into the WRP. Mulvihill reported the pH of the plant raw influent began rising at 1406 hours, peaked at 9.3 at 1410 hours, and then slowly fell, being at 8.75 at the time of his call at 1425 hours. A sample of the raw influent was taken at 1410 hours by operators for possible analysis. Operators determined the high pH wastewater came in on the north line by checking the line and finding a pH of 9.0 at 1415 hours. Mulvihill said the south line pH wasn't checked. Operators had checked the crown spray schedule data and determined there was no planned crown spraying activities upstream of the WRP being done prior to the incident on 2-4-14.

At 1510 hours on 2-4-14 Mulvihill called Boyd back and stated the pH had gone up again (another quick spike). See figure 1 below.

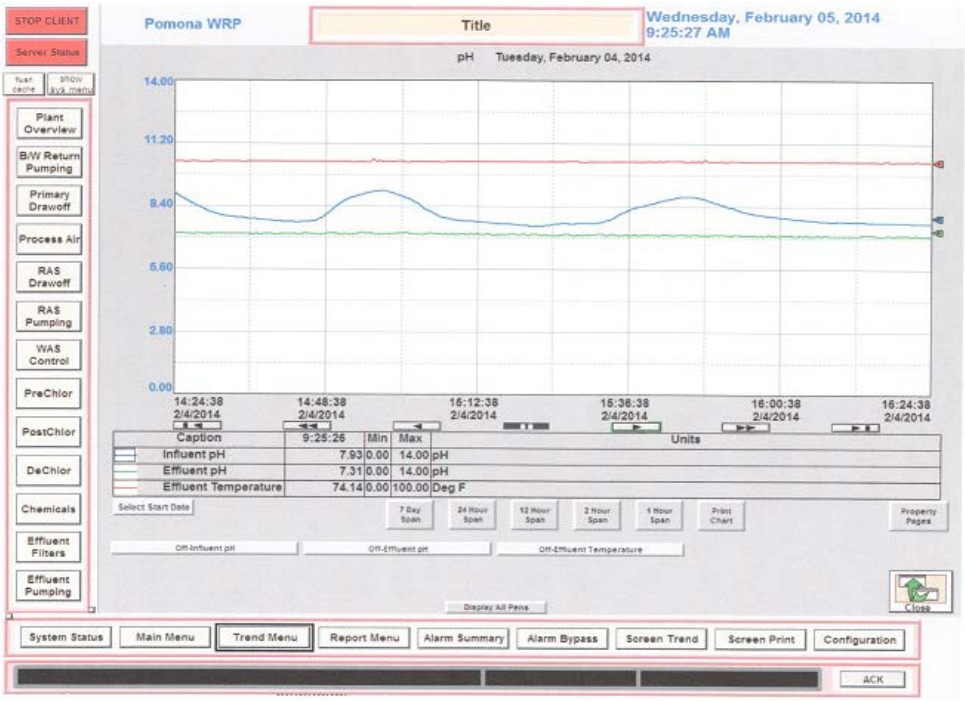

Figure 1: Influent pH screen grab chart from the Pomona WRP on 2-4-14. The blue line indicates the two high pH periods.

Inspection of possible industrial facilities, as well as investigating sewer maintenance activity upstream of the Pomona WRP, failed to identify an incident source. Initial indications including the timing, recording chart patterns, and visual characteristics of the wastewater led I.W. investigators to believe that the elevated pH was caused by upstream sewer crown spray work. Investigators confirmed that the crown spray contractor was indeed performing work on sewers in the Pomona area on the day of the event, but the work was done on a sewer (the Chino Basin Wastewater Line) that bypasses the Pomona WRP. A cross connection located near the treatment plant that could possibly allow wastewater from the Chino Basin Line to infiltrate the Pomona WRP was identified, but the connection design does not allow any infiltration. To

further complicate the investigation, there were conflicting reports as to which influent line (north or south) the high pH material was found. Initial reports indicated the material was entering through the north line, but subsequent conversations with WRP operations staff presented doubt as to that assertion.

No evidence was found at the major upstream industrial dischargers that would indicate a spill or other anomalous operation caused a sewer discharge of alkaline material. Separate influent samples taken on the day of the event and two days later were analyzed and compared. Both samples showed low magnesium concentrations, which appear to eliminate sewer crown spray (magnesium hydroxide) as a cause for the incidents. The incident sample did show elevated aluminum and calcium concentrations, which could indicate the manhole (MH) rehabilitation work done on the Claremont and Claremont Relief Trunks, which uses a calcium aluminate material, caused the incidents. However, review of the Sanitation Districts' GIS showed these sewers bypass the Pomona WRP as well.

Plant operations staff reported that there were no effects on treatment plant processes or issues with final effluent quality as a result of these incidents. I.W. staff will continue to monitor the upstream area and respond to any future reports.

San Jose Creek Oily Sheen

On Thursday, 2-6-14 at 1125 hours, Sanitation Districts' Supervising Biologist Carlita Barton called John Boyd and reported that her crew members had noticed an oily sheen present in San Jose Creek near the "Pomona Station" sampling location at 1100 hours that day. The sheen was seen just upstream of the location where the creek bottom transitions from being concrete to sediment in the Los Angeles County unincorporated area of Avocado Heights about one-half mile east of the Sanitation Districts' Joint Administrative Office. Barton sent Boyd an email giving the GPS coordinates of this location as N 34° 01' 55.5" W 118° 00' 11.6". The location can further be described as being just north of the Fry's Electronics Store. Boyd and Supervising I.W. Inspector Dave Lee went to the creek to observe the sheen in an attempt to determine its severity and appropriate actions to take. It should be noted that earlier that morning there had been light rainfall in the area. A moderate sheen was seen on the creek surface by Boyd and Lee. The sheen was visible for several hundred yards upstream, at which point Boyd and Lee stopped following it. There was no evidence of a nearby source for the oil. Boyd determined the sheen was significant enough to report to the L.A. County Department of Public Works for possible further investigation. Boyd contacted LADPW Source Control Inspector Corey Mayne at 1230 hours and emailed him the information and photos of the sheen. Sanitation Districts' I.W. Inspectors did not conduct any further investigation. The area where the sheen was observed is more than a half mile upstream of where the effluent from the Sanitation Districts' San Jose Creek East WRP discharges into the creek and it was noted that the oil could not be from the SJC WRP's effluent. It was also noted that operations and final effluent discharge into the San Jose Creek were normal that day at the Pomona WRP, which is located 13.7 miles upstream of the area where the sheen was noted. The most probable cause of the oily sheen was rainwater runoff from streets and roads getting into the creek due to the earlier rainfall.

Figure 2: Satellite photo showing the location of the oily sheen found in San Jose Creek on 2-6-14.

Figure 3: 2-6-14 oily sheen on San Jose Creek at location noted on Figure 2.

Tip of Illicit Sewer Discharge at SignResource in Maywood

On Friday, 2-14-14 at 1035 hours, a U.S. EPA criminal investigator called John Boyd and passed along a tip she received. The tipster alleged that SignResource, a large sign manufacturer located at 6135 District Blvd. in the City of Maywood, was illicitly discharging industrial wastewater into the sanitary sewer system. The tipster also reported paint filters from the company's paint booths were being dumped into the regular trash instead of being properly disposed. An investigation by area I.W. Inspector Greg Neunsinger verified the facility makes

large signs for retail establishments and major corporations. The outdoor and indoor signs are constructed of steel, wood, and plastic, and contain electrical lights for illumination. Manufacturing operations include metal work and welding, vacuum forming, painting, and vinyl application. There is a small silkscreen department that makes the changeable numbers used in service station pricing signs. Neunsinger found no industrial wastewater connection at the site and no evidence of any industrial wastewater being discharged to the sewer, including from the painting and silk screening departments. The only use of water he found for industrial purposes was for water saw and plasma cutting machines that utilize a recirculating water tank with no discharge. Inspection of waste manifests found well maintained records and no evidence that any wastes, including the paint filters noted in the tip, were being mishandled or disposed of inappropriately. No further investigation of the tip is anticipated at this time.

Lancaster WRP High Turbidity

On Tuesday, 2-18-14 at 0720 hours, Lancaster WRP Supervising Treatment Plant Operator Dan Shubin called John Boyd and reported that the treatment plant had been experiencing daily high turbidity in the secondary effluent since 2-11-14. The turbidity generally raises 2-6 NTU's for 1-4 hours beginning at 2100 hours. Final effluent turbidity is unaffected and there have been no NPDES violations. Shubin estimates the material causing the high turbidity would have been in the treatment plant for about 9 hours by the time the secondary effluent turbidity rises, so he calculates whatever is causing it is coming in at about noon each day. Operators have not noticed anything else unusual such as unusual odors, color, foam, or high/low dissolved oxygen levels in the secondary process tanks. The plant has no influent pH meter, so it's unknown if there have been any influent pH excursions associated with the incidents. Shubin said he was mainly calling due to the unusual highly periodic nature of the incidents.

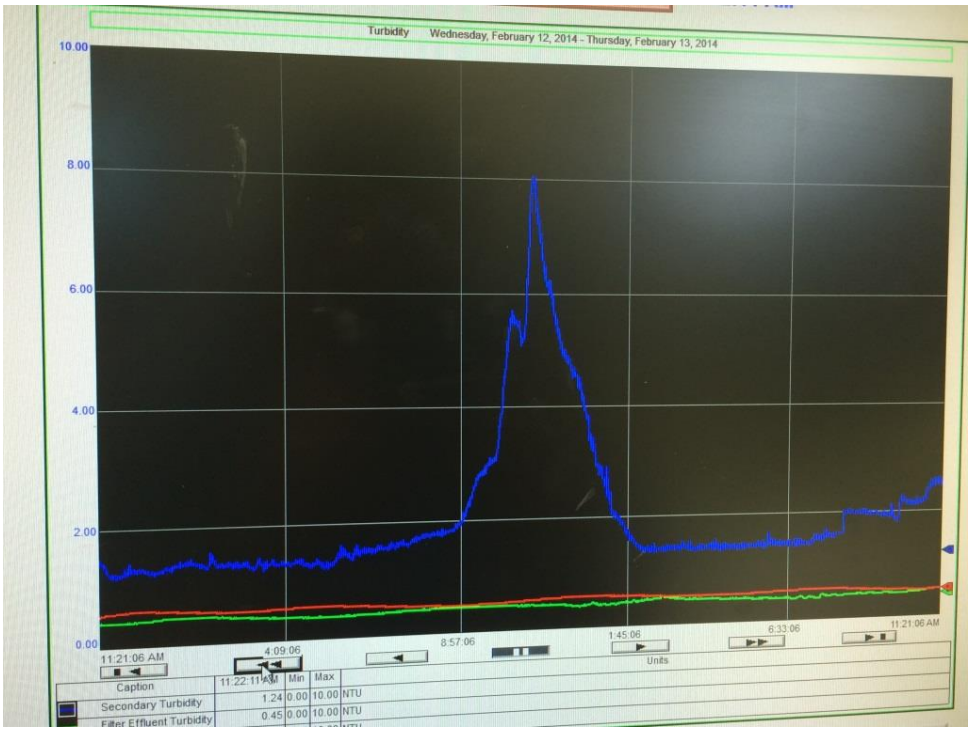

Figure 4: Screen grab photo of the Lancaster WRP control room computer showing the high secondary turbidity spike on 2-12-14. This spike is typical of the spikes being noted.

Investigation by area I.W. Inspector James McCurdy found no source(s) for the incident. Inspections at the two most likely potential sources, the Lancaster State Prison and the Lancaster liquid waste disposal station (LWDS) found no evidence of any discharges which could be

causing the incidents. I.W. Inspectors are continuing to investigate and are currently planning to test WRP primary effluent samples to look for any materials which could be the cause.

Amargosa Trunk Illegal Sewer Connection in Lancaster

On Wednesday, 2-19-14, the I.W. Section was notified by CSD Water Reclamation Plants Engineer David Pierce of a likely illegal connection on the Amargosa Creek Trunk in Lancaster. Pierce indicated that a review of a 4-26-13 CCTV inspection between MHs 14 0656 and 14 0657 showed what appears to be a 4" black PVC or ABS pipe extending down 6-8" into the 15" diameter trunk sewer. The Sanitation Districts' have no record of a direct sewer connection permit at this pipe location. I.W. section staff was asked to investigate the source of the probable illegal connection and pursue enforcement action if necessary.

Figure 5: 4-26-13 CCTV screen grab showing the illegal 4" line connection on the 15" Amargosa Creek trunk sewer in Lancaster.

Investigation by area I.W. Inspector James McCurdy determined the connection was indeed made illegally and had been made to accommodate the discharge of sanitary wastewater from a bathroom located inside a modular office trailer at the site of Bunge's Storage at 510 West Ave L in Lancaster. It is planned to issue a notice of violation to the owner of the storage yard on 3-4-14 for violating Section 302 of the Sanitation Districts' *Wastewater Ordinance*, which prohibits making a direct connection of a sewer line 6" or smaller to a Sanitation Districts' trunk without first obtaining a permit from the Sanitation Districts. Following issuance of the notice of violation, the owner will be required to correct the situation as appropriate. This will likely include removal of the illegal connection, repair to the trunk line, and his payment for the costs incurred by the Sanitation Districts in completing this work. The Sanitation Districts may also levy a fine for the violation.

Figure 6: Satellite photo from Sanitation Districts' GIS showing where a modular office trailer was found illegally connected to the adjacent Amargosa Creek trunk sewer line.

INDUSTRIAL WASTE SECTION
SUMMARY OF ACTIVITIES
FOR THE MONTH OF MARCH 2014

TREATMENT PLANT/SEWER/OTHER INCIDENT INVESTIGATIONS

Long Beach WRP Low pH

On Tuesday, 03-11-14 at 1420 hours, Long Beach WRP Assistant TPO Chad Vander Muelen telephoned I.W. Inspector Traci Stahl and reported that the raw influent at 1352 hours had a pH of 5.5. At the time the call was made, the pH had already risen to 5.8. At 1450 hours Senior Night Team I.W. Inspector Kent McIntosh spoke with TPO 1 Carlos Vasquez, who reported said the pH was by then up to 6.95, above the alarm set point of 6.5, just below the usual level of 7.2. A one-liter sample of the raw influent was taken by operators for possible metals analysis.

No definitive source for the low pH was identified during the subsequent investigation by Sanitation Districts' I.W. Inspectors. However, it was noted that California Dairies, Inc., may have contributed to the low pH incident. Examination of the company's effluent pH recorder data indicated a minor low pH excursion to pH=5.5 at 0825 hours for which the company was given a verbal warning. However, the relatively minor nature of the excursion indicates the company was not the primary source. The cause of California Dairies' low pH discharge was determined to be improper procedures carried out during routine maintenance of their wastewater pretreatment system.

California Dairies, Inc. IW 5124 300,000 GPD
11709 Artesia Blvd
Artesia, CA 90701

WRP operations staff reported that there were no effects on treatment plant processes or issues with final effluent quality as a result of the incident. I.W. staff will continue to monitor the upstream area and respond to any future reports.

Referral of Oil Dumping in Inglewood

On Tuesday, 3-11-14 at 1430 hours, Sanitation Districts' Waste Management Department Secretary Denise Springer received a telephone call from L.A. County Fire Department Captain Marty Smith. Smith reported that he wanted to set up a joint, multi-agency inspection sometime in the near future at Fox Auto, an automotive repair shop at 10101 Hawthorne Blvd. in Inglewood. Smith said he had received information that shop employees were dumping used motor oil into a sewer line manhole located behind the shop. John Boyd subsequently spoke with Smith and it was agreed the Sanitation Districts would participate in the multi-agency inspection.

Fox Auto FID 9248021 0 GPD
10101 Hawthorne Blvd.
Inglewood, CA 90304

On Tuesday, 4-1-14 at 1000 hours, I.W. Inspector Michael Placencia participated in a multi-agency inspection at Fox Auto and its sister company next door, Vallarta Auto Service. The two businesses have related ownerships, with the owner of one being the uncle of the other. The two companies both have poor housekeeping practices and inadequate record keeping. Neither was able to produce records indicating proper disposal of waste materials generated

on-site. However, the inspection did not find any direct evidence that used oil or other waste materials were being dumped into a nearby sewer manhole. It was noted that some used oil was dumped onto the root structure of a nearby palm tree. Fire Department and Inglewood code enforcement officers wrote both companies multiple citations for violations noted. City code enforcement officers will follow-up on these violations.

Figure 1: Photo taken on 4-1-14 showing local line sewer manhole located in the alley behind 10101 Hawthorne Blvd in Inglewood. Note the palm tree directly behind the manhole where some waste used oil was noted that had appeared to have been dumped onto the tree roots.

Figure 2: View into local sewer line manhole shown in Figure 1. Note the lack of oil or oily residue that would be expected if the manhole were being regularly used to dispose of waste oil.

Figure 3: Oily residual from suspected illicit disposal of used oil on palm tree roots.

Possible Main Street Pumping Plant Force Main Overflow in Carson

On Tuesday 3-11-14 at 1120 hours, Los Angeles County Department of Public Works (LADPW) Waste Control Engineering Inspector Jason Mono notified Supervising I.W. Inspector David Sanchez of a possible ongoing sanitary sewer overflow (SSO) at 21205 Main Street in Carson. Sanchez conducted a GIS review of the sewer system in the area and noted that three Sanitation Districts' force main lines run beneath the site in question. Per Mono, there was an unknown source of WW "gurgling" from either a sump or through the soil at the eastern edge of the property (along Main St.). Sanchez notified Doug Walton, Superintendent of the Sanitation Districts' Collection System, and Supervisor of Collection System William Foley of the report. Area I.W. Inspector Tingting Wei was also notified and responded to the site.

I.W. Inspector Wei, collection system maintenance crews, and vacuum pump trucks arrived at the site at 1200 hours, but were unable to locate the reported possible SSO. LADPW Waste Control Engineering Inspector Brad Kuwata met with collection system personnel and Wei to identify the location of the "overflow." Kuwata pointed out what looked like sewage stains on the side walk in front of the building at 21205 Main St. It was determined there was no ongoing SSO. However, the stains noted indicate that occasionally a septic tank cleanout at the site overflows. After learning there was no actual spill or immediate spill threat, the Compton crew left. LADPW and Sanitation Districts' I.W. Inspectors Wei and Sanchez then conducted a joint inspection of the company occupying the site, Limo4me.

Limo4me was determined to be a party bus/limo rental company. Buses/limos are washed using soap and water in the back of the facility on a concrete pad with no drains. Sanchez informed company contact Derek Smith that such wash water is considered industrial wastewater and should be contained within the premises. Property owner Peter Fu arrived on site. Fu confirmed the building is not connected to the public sewer. The 1500-gallon septic tank is the only wastewater disposal system for the building. Fu complained that the level in the septic tank rises quickly during heavy rain events and that as a result he has to schedule frequent maintenance of the system. During rainy weather, surface run-off from the property, including water running from building downspouts, gets into the septic tank. Inspectors suggested any potential drains which could feed water into the septic tank, including the cleanout noted above, be sealed to prevent rainwater from entering. Inspectors reiterated the discharge of vehicle wash water into the street was illegal and advised the contacts to either cease vehicle washing or

pursue installation of a connection to the local sewer so that wash water can be legally and properly disposed into the sewer system.

Paramount Petroleum Oily Water Spill in Paramount

On Wednesday, 3-12-14 at 1330 hours, Supervising I.W. Inspector David Sanchez noted that the California State Emergency Management Agency's hazardous materials spill report website had a report that 20-30 barrels of oily water had been accidently released into secondary containment at the Paramount Petroleum oil refinery in Paramount at 1115 hours that day.

Paramount Petroleum 14700 Downey Blvd Paramount, CA 90723	IW 17236	280,000 GPD

Area Inspector Sanjay Patel investigated the spill report on 3-13-14. According to Manager of Environmental Services Kathryn Gleeson, the contact at Paramount Petroleum, the spill in question consisted of 30-40 barrels of oily brine water that leaked from a broken flange seal on a pipeline. Gleeson stated the company noticed the leak/spill during a routine check on 3-12-14 at 1100 hours. The leak was contained in a bermed area and nothing was released into the sewer as a result of the spill. The spilled oily water was pumped out of the bermed area and hauled to a holding tank at the pretreatment process area for processing to remove the oil. The treated brine will be discharged to the sewer once testing confirms it meets all limits. At the time of his inspection Patel noted the company was in the process of removing contaminated soil from the bermed spill containment area. Gleeson indicated this soil would be stored in drums and hauled offsite for proper disposal. The spill was properly logged in the company's spill containment logbook as required by the Sanitation Districts. Field sampling of the ongoing industrial wastewater discharge indicated compliance with all applicable limits. The incident had no impact on Sanitation Districts' sewers or operations.

JWPCP Headworks Elevated Explosivity

On Sunday, 3-23-14 at 1615 hours, Jaime Hernandez of the CSD Long Beach Main pumping plant alarm center called Supervising I.W. Inspector David Sanchez and stated JWPCP operators had just reported elevated combustible gas concentrations at the JWPCP head works on the J.O. 'A' and J.O. 'D' lines. JWPCP Supervising TPO II Sam Mapatunage observed rising combustible gases on fixed LEL meters and used a handheld LEL meter to measure head space gases as well. At 1545 hours Mapatunage measured 23% LEL on the J.O. 'D' line and 12% LEL on the J.O. 'A' line. TPO Nick Atelano indicated the fixed combustible gas meter system showed LEL=12.6% to 12.9% on the J.O. 'D' and J.O. 'A' lines at 1620 hours.

I.W. Senior Inspector Bill Barnum investigated the report on 3-23-14. He noted there were no deleterious impacts on JWPCP operations as a result of the elevated LEL conditions. The conditions were localized to the headworks with no combustible gases noted at the downstream secondary influent pump station. There were no odors or visual characteristics to suggest a petroleum hydrocarbon was causing the elevated LEL at the headworks. By 1910 hours on Sunday evening the combustible gases at the headworks returned to normal levels. Inspections on 3-23-14 and 3-24-14 at possible upstream sources did not identify a source for the incident. The likeliest industrial user to impact both headworks, ExxonMobil's large Torrance oil refinery, was closely inspected and found to be in compliance with all their discharge permit requirements and operations were normal. Review of their discharge logs and monitoring data charts, including those for LEL concentrations at their outfalls found no evidence indicating ExxonMobil was the source. I.W. staff will continue to monitor the upstream area and respond to any future similar reports.

Davidson City Pumping Plant #2 Chemical Odor

On Thursday, 3-27-14 at 1205 hours, Long Beach Main Pumping Plant Operator Denis Delgado called John Boyd and reported that while in the process of deragging a pump at the Davidson City Pumping Plant #2 in Carson at 1200 hours, a Sanitation Districts' operator had noted a strong chemical odor. The operator saved samples of the rags that contained the odor and was waiting at the pumping plant to speak to an I.W. Inspector. Senior I.W. Inspector Bill Barnum and I.W. Inspector Tingting Wei responded and investigated the report. Senior Night Team I.W. Inspector Kent McIntosh also participated in the investigation when he came on shift at 1500 hours.

At 1235 hours Barnum met with Pumping Plant Operator Michael Molina at the Davidson City Pumping Plant. Barnum noted a faint sickly sweet odor was present inside and outside the pump house which Molina confirmed was the same odor he had noticed and reported earlier. The odor was also faintly present in the wet well.

Inspections were performed at eight industrial users tributary to the pump plant, but the source of the odor was not identified. Industrial facilities investigated included a chemical manufacturer, a locomotive repair facility, a groundwater remediation project, a pharmaceutical manufacturer and two transportation equipment cleaning (tanker truck washing) facilities. The chemical odors dissipated during the afternoon of the 27th and were not observed later that evening or during the next day. I.W. Inspectors will continue to inspect upstream facilities looking for the source of the incident. Any discovery of a discharge creating or contributing to nuisance conditions in the collection system, including the Davidson City Pump Plant, will result in enforcement action as appropriate.

INDUSTRIAL WASTE SECTION
SUMMARY OF ACTIVITIES
FOR THE MONTH OF APRIL 2014

TREATMENT PLANT/SEWER/OTHER INCIDENT INVESTIGATIONS

Illicit Storm Drain Discharge Tip in Whittier

On Friday, 4-4-14 at 1450 hours, John Boyd received a call from Monica a "211 Operator" with the Los Angeles County Resource and Referral Hotline. Monica reported she had received an anonymous citizen complaint of an illegal residential business operation located at 10241 Parkinson Avenue in the City of Whittier. The caller reported the residence was the site of illegal auto detailing and garden/yard maintenance businesses and both were illicitly discharging chemical laden wastes into the street (storm drain). The tipster claimed the auto detailing operations result in cleaning chemicals being discharged and the yard maintenance operations result in the dumping of oil and gasoline wastes. Boyd advised Monica to also notify code enforcement officials and the LA County Storm water dumping hotline (1-888-CLEANLA) of the tip as well. She said she would do so immediately. Boyd notified Supervising Inspector David Sanchez of the call and it was planned that an I.W. Inspector would conduct a drive-by inspection of the home sometime in the next week to determine if there is any evidence that would warrant further action by the Sanitation Districts. It is likely follow-up by code enforcement officers will resolve the situation without Sanitation Districts' involvement.

Senior I.W. Inspector Juan Sanchez went to the location reported on 4-9-14. He observed no evidence of the illicit storm drain dumping activities alleged. There was no visible staining, oil residue, odors or any other indication of the reported “chemical laden waste” being dumped (see photograph below). Sanchez deferred to local code enforcement for further inspection activities inside the yard or within the residence.

Figure 1: 4-9-14 photo of the street gutter in front of the residence located at 10241 Parkinson Ave in the City of Whittier where illicit dumping activities into the storm drain were alleged. Note the lack of any evidence for such activities.

Rotten Egg Odor in Santa Fe Springs

On Tuesday, 4-8-14 at 0840 hours, I.W. Section Senior Typist Clerk Sandra O'Karma received a telephone call from Owner Norman Nguyen of Sea One Seafoods in Santa Fe Springs. Mr. Nguyen complained of a strong rotten egg odor present in their warehouse at the start of their morning shift at approximately 0630 hours that day. Mr. Nguyen stated he believed the odor source was the Ridgeline Energy Services USA Inc. facility located across the street from his facility on Florence Avenue. The Ridgeline facility has a recent history of causing moderate to severe sulfide and foul odor incidents in the area due to holes present in large old storage tanks and ongoing waste processing and treatment operations. Holes present in the tanks, which were the source of thousands of foul odor complaints filed in the fall of 2013, have now been patched, but the company remains under close scrutiny by both regulators (AQMD, LACSD, and the City of Santa Fe Springs) and the surrounding community as regards the presence and release of foul odors from their operations. Ridgeline is currently operating under an order of abatement issued by the AQMD as they attempt to drain, empty and demolish all of the large legacy tanks left onsite following the closure of the Powerine Oil refinery which used to occupy the site over a decade ago. Per the most recent AQMD hearing with Ridgeline on this matter, conducted on 4-30-14, Ridgeline is planning to have all the legacy tanks removed by the fall of 2014. Sanitation Districts' I.W. Section engineers and field staff are closely monitoring all aspects of this situation, especially the potential for wastewaters discharged legally under their I.W. discharge permit to contain materials which could cause odor complaints. Note that residents in the area are keenly aware of the situation and there are numerous signs posted on streets in the areas surrounding the Ridgeline facility advising residents to notify authorities of any foul odors they notice. Supervising I.W. Inspector David Sanchez and I.W. Inspector Sanjay Patel investigated the 4-8-14 complaint.

Sea One Seafoods 12319 Florence Ave Santa Fe Springs, CA 90670	IW 9473	100 GPD
Ridgeline Energy Service USA Inc. 12345 Lakeland Rd. Santa Fe Springs, CA 90670	IW 21170	200,000 GPD

Figure 2: Signage near the Ridgeline facility providing information to residents about odor complaints.

Figure 3: Large, old refinery tanks at the Ridgeline facility which are in the process of being emptied and demolished.

Sanchez and Patel verified the presence of a mild rotten egg type odor in and around the Sea One Seafood facility but determined the odor was not coming from the sanitary sewer system nor caused by discharges into the sewer system by Ridgeline. Reconnaissance of the local area found the foul odors, typical of those which emanate from the Ridgeline facility, were present on Florence Avenue between the Sea One Seafoods and the Ridgeline facilities. The Ridgeline facility was almost certainly the source of the odor. Mr. Nguyen stated he had also notified the AQMD of the foul odors observed. Given the lack of evidence that any sewer related activities caused or contributed to this incident, it is anticipated any enforcement action to be taken due to the release of the foul odors will be handled by the AQMD. No further action or investigation was conducted by Sanitation Districts' I.W. staff.

<u>Altadena Dairy in City of Industry Low and High pH Self-Reports</u>

On Thursday, 4-10-14 at 1015 hours, Area I.W. Inspector Anie Kellzi received a call from Lucien Mauge, EH&S Manager at the Alta Dena Dairy in City of Industry. Mr. Mauge reported the company had accidently discharged industrial wastewater that had a pH of 0.5 that day between 0200 and 0500 hours. Mr. Mauge could provide no further information as to the volume, flow rate, or cause of the acidic discharge.

On Tuesday, 4-22-14 at 1040 Kellzi received a voice mail message from Mr. Mauge indicating that the company experienced a 45-minute period earlier that morning (0600-0645) where the discharged industrial wastewater had a high pH of 12-14. Mauge estimated that approximately 10,000 gallons of wastewater was discharged during this timeframe. He claimed the situation had been resolved and wastewater operations were back to normal. Kellzi performed follow-up site inspections after both of the reports outlined above.

Alta Dena Certified Dairy, LLC IW 15183 325,000 GPD
16737 E. Valley Blvd
City of Industry, CA 91744

Kellzi's inspections on 4-10-14 and 4-11-14 regarding the low pH discharge report confirmed the company's data and noted there had been an average flow of 185 gpm with an estimated total flow of 25,000 gallons during the 0200-0500 hours period. The company's

investigation revealed the pretreatment system sodium hydroxide addition pump and effluent pH alarm failed, causing the low pH discharge and delaying operator response to correct the situation respectively. At the time of her inspection on 4-10-14 Kellzi noted the pretreatment system chemical addition pumps had been repaired and were working properly. On 4-11-14 Kellzi issued a written notice of violation for the discharge of the low pH wastewater and the company's failure to maintain required pretreatment equipment. Mr. Mauge accepted the NOV and stated Alta Dena Dairy takes the violations very seriously and is in the process of acquiring and installing new wastewater pH control equipment, as well as a new alarm system to prevent recurrence of the violations.

Kellzi also conducted an inspection on 4-22-14 to investigate the high pH reported by Mr. Mauge. Per Mr. Mauge the high pH discharge totaled about 10,000 gallons and was due to a high volume of clean-in-place ("CIP") alkaline wastewater being discharged that overwhelmed the pretreatment system's ability to neutralize the flow. The company was issued a verbal warning for exceeding their upper pH limit of 11.0. The company subsequently adjusted the set points of the pH neutralization system such that acid is added sooner when highly alkaline wastewater comes into the system to help prevent recurrence of the violation.

Neither of the above incidents resulted in the downstream Sanitation Districts' treatment plant, San Jose Creek East WRP, experiencing any upset or treatability issues. The low pH discharge of 4-10-14 was very slightly evidenced on the WRP's raw influent pH trend data, but the 4-22-14 high pH discharge was not evidenced at all at the WRP. Inspector Kellzi is continuing to monitor the company closely.

Tip of Possible Unpermitted Commercial Truck Wash in the City of Industry

On Tuesday, 4-15-14 at 1015 hours, James Garcia, who claimed to work for the San Gabriel Valley Water Company, called the Sanitation Districts and spoke with John Boyd. Mr. Garcia stated he was calling about an unnamed truck washing operation located at 13005 East Temple Avenue in the City of Industry. He said he was curious if they were properly handling the oily wastewater they generate from washing trucks and steam cleaning engines. Garcia said he didn't want to be notified of the results of any investigation the Sanitation Districts were to conduct into the matter, but rather just wanted to be sure the issue had been properly addressed by the responsible public agencies. Boyd's initial review of Google maps and Sanitation Districts' iPACs records indicated there may be a previously uninspected and unpermitted truck washing operation at the referenced site.

Upon notification by Boyd, Supervising I.W. Inspector Dave Lee conducted further research, which quickly resulted in Lee finding that the truck washing facility in question is already well known to the Sanitation Districts but uses a cross street address different than that initially referenced by the caller. The facility has been operating with an active I.W. discharge permit issued by the Sanitation Districts since August 2011. The facility in question is:

Saenz Equipment Storage Inc. IW 20954 2236 GPD
351 Covina Lane
La Puente, CA 91746

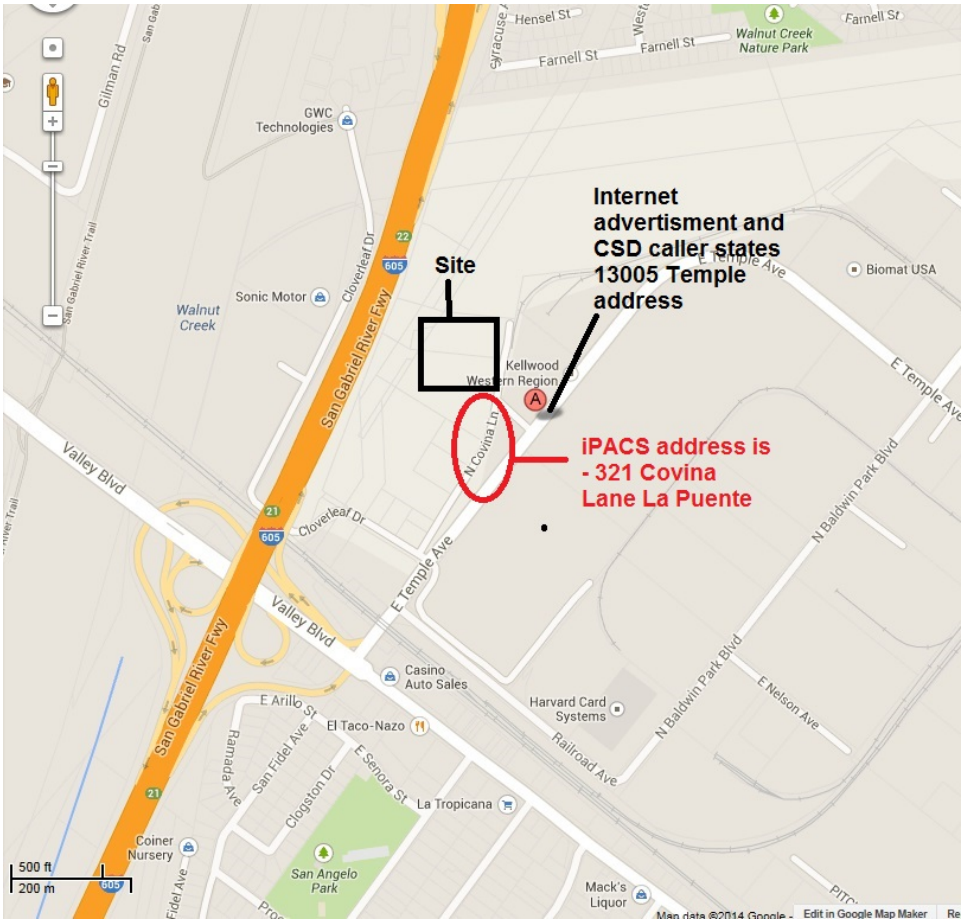

Figure 4: Map showing the two addresses for the single facility in question that has a truck washing operation.

The most recent facility inspection at Saenz Equipment Storage was conducted on 2-6-13 by now retired I.W. Inspector Elaine Myrick. Her inspection comments indicate the facility operates a covered truck wash area where 10-15 trucks are washed daily and that the facility is in compliance with all Sanitation Districts' requirements and limits. No further investigation or follow-up by Sanitation Districts' I.W. inspection staff is anticipated at this time.

<u>CUPA Referral of California Pool & Chemical Facility in Artesia</u>

On Wednesday, 4-23-14 at 1022 hours, John Boyd received an email referral from Supervising Hazardous Materials Specialist Fernando Flores of the Los Angeles County Fire Department. The email contained a forwarded email from LACFD Hazardous Materials Specialist Eric Poomiwatracanont regarding possible illicit acidic I.W. discharges at a California Pool and Chemical Service facility located at 17210 Jersey Avenue in Artesia. The e-mail also expressed concerns that the discharges may be causing corrosion and sulfide gas generation in downstream sewers.

California Pool & Chemical Service IW 21486 5 GPD
17210 Jersey Ave.
Artesia, CA 90701

On 4-29-14 Senior I.W. Inspector Juan Sanchez and area Inspector Steve Lajkowicz inspected the facility. It was found that the company buys, repackages, and sells hydrochloric acid and hypochlorite solutions to pool maintenance business operators. An acid fume scrubber is in place which generates 100-150 gallons per month of acidic wastewater that is manually neutralized prior to discharge to a sanitary sewer cleanout onsite. Inspections at this facility by Sanitation Districts' I.W. Inspectors in December 2010 resulted in a determination that the

facility was permit exempt. However, given the scale of the operation and concerns about possible negative impacts to the collection system caused by their discharges, and the need to properly regulate and monitor the operations, the decision to classify the facility permit exempt has now been reversed. Inspector Lajkowicz is scheduled to issue the facility a temporary permit in early May 2014. It is anticipated that procedures and equipment required as part of permit implementation will include documenting and logging the treatment and discharge of all wastes and the installation of a proper sampling point that includes an automatic pH monitoring and recording system.

Valencia WRP Sweet Odor

On Friday, 4-25-14 at 0725 and 1025 hours, Valencia WRP TPO II Joe Berlanga called John Boyd and reported that at 0630 and 1020 hours that morning operators had noted a "sweet" and citrus type odors in the plant at the secondary aeration tanks. Examination of operations data indicated there was also slight drop in the plant dissolved oxygen levels around midnight according to data from "tank 6". This drop may be associated with the sweet odor. Other than the odor and slight drop in dissolved oxygen concentration, no other plant parameters were affected and the WRP operated normally. Berlanga was unable to estimate when the material might have been discharged into the upstream sewers due to holding times associated with wastewater holding tankage upstream of the plant potentially delaying the material that was discharged entering the plant. Given this, it's possible the material may have been discharged as early as the early afternoon of the previous day (4/24). A grab sample of primary effluent was taken by operators on April 25 at 0630 hours for possible pick-up by I.W. Inspectors should they want to do an analysis.

Inspections at possible industrial sources for this incident were conducted by Senior I.W. Inspector Steve Sealy and Inspector Jonathon Powell. Flavor Producers Inc. was identified as the source of the odor causing material. Waste with a low pH (2.7), syrup like consistency, and strong citrus odor was found in the company's wastewater sample box on 4-25-14 at 1050 hours. The material appeared to be orange flavor concentrate which the company makes and sells to food and related product manufacturing operations. Company contacts provided no explanation as to why the material was discharged to the sewer but Sealy suspects it was an off-spec batch that was dumped instead of being hauled offsite for disposal. The company was issued a notice of violation for low pH discharge, but not for upsetting WRP operations since there was only a slight dissolved oxygen concentration drop at the WRP and no NPDES violation occurred.

Flavor Producers, Inc. 28350 Witherspoon Parkway Valencia, CA 91355	IW 17052	2200 GPD

INDUSTRIAL WASTE SECTION
SUMMARY OF ACTIVITIES
FOR THE MONTH OF MAY 2014

TREATMENT PLANT/SEWER/OTHER INCIDENT INVESTIGATIONS

City of South Gate One-Time Discharge Request

On Monday, 5-5-14 at 1500 hours, John Boyd received a call from City of South Gate Sewer Superintendent Ray Valenzuela. Valenzuela said he was calling to gather information regarding what was necessary to gain permission from the Sanitation Districts for a potential one-time discharge of 12,000 gallons of potentially sediment laden water generated from the draining of a city 0.5 million gallon capacity, 140' tall, above ground potable water tower tank located at the corner of Santa Fe Ave and Ardmore Ave in South Gate. He estimated the project would be occurring within the next 6 months. Boyd told Valenzuela that in general, the desired one-time discharge approval can only be gained if the city were to utilize a city facility already under permit with the Sanitation Districts for the discharge (i.e. haul the water from the tank draining project to such a location for discharge). To use another location, such as a manhole or other connection to the local sewer at the water tower tank location, would require completing and submitting an I.W. permit application, not to mention the possible generation of a connection fee for the proposed discharge. It subsequently came to light that the tank cleaning project commenced on 5-6-14 and given the Sanitation Districts' requirements for discharge to the sewer, the city and its contractor decided it would be easier and much more expedient, to filter the sediment laden water from the tank and then discharge it to the storm drain under the city's general storm water (MS4) permit, which allows such discharges according to city officials. The project was completed on 5-6-14.

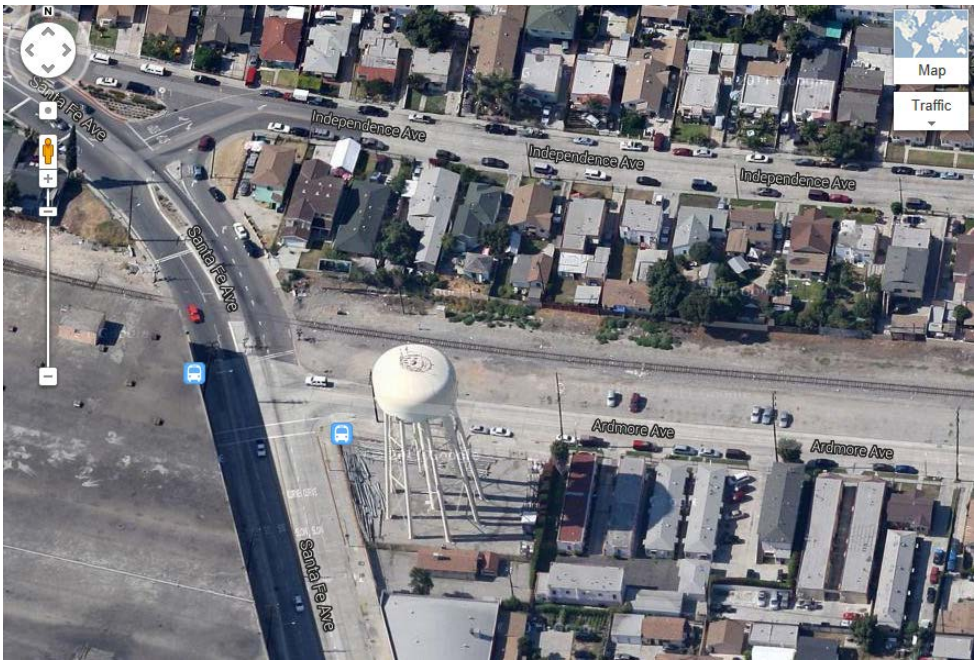

Figure 1: Google maps image of the 0.5 MG potable water tank in South Gate that was drained on 5-6-14.

ExxonMobil Torrance Refinery Sanitary Line Headspace High Explosivity Self-Report

On Tuesday, 5-6-14 at 1055 hours, ExxonMobil Torrance Oil Refinery Environmental Coordinator Mary Nardone called John Boyd and reported that a routine daily LEL check conducted at the headspace of the sanitary sewer line manhole located just south of the IW #516

off site access monitoring location (the "Van Ness" outfall) had found LEL=75% at 0930 hours. In response to this finding, refinery operators flushed the sewer line with water and then rechecked the LEL at the manhole at 1030 hours, finding it at its normal 4% level. Nardone stated operators were unsure of the cause of the high reading on 5-6-14, but speculated it was due to a buildup of methane gas associated with degrading sanitary sewage in the line. Boyd asked Nardone to do some further investigation into the matter as a long term high explosivity incident at this same manhole location approximately 12 years ago was eventually traced to an underground gasoline product line within the refinery that had cracked. Gasoline seeping periodically from this product line got into an adjacent sanitary sewer line causing mysterious high LEL conditions for over a year in both the refinery's sanitary line and the downstream Sanitation Districts' trunk sewer before it was finally determined what was causing the problem. See the below old diagram and photo from this incident. Nardone said she would have the LEL at the manhole rechecked in the afternoon on 5-6-14 and if a result above 10% had returned she would notify Boyd immediately. Note that the reason the company checks this sanitary line manhole LEL daily is to prevent recurrence of the incident 12 years ago.

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

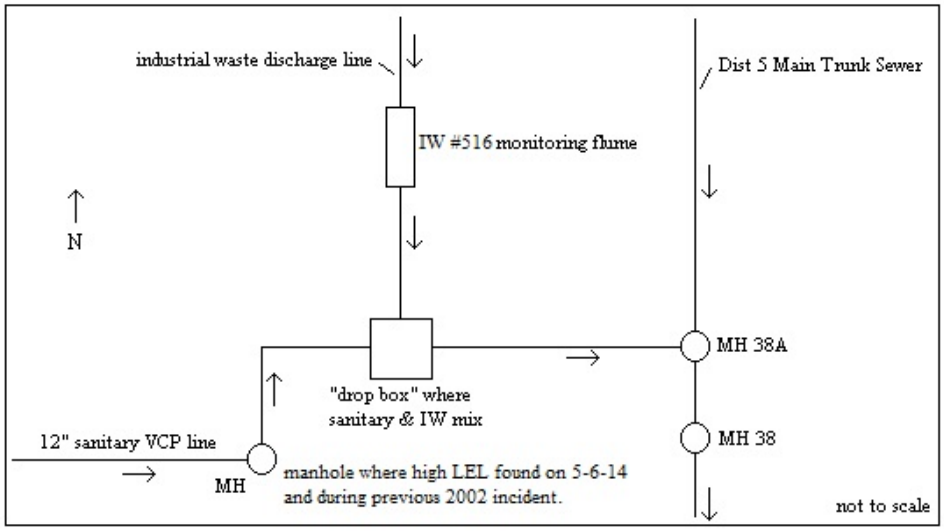

Figure 2: Diagram showing the relationship between the sanitary and industrial wastewater lines at the ExxonMobil refinery's Van Ness connection to the Sanitation Districts 5 Main Trunk sewer.

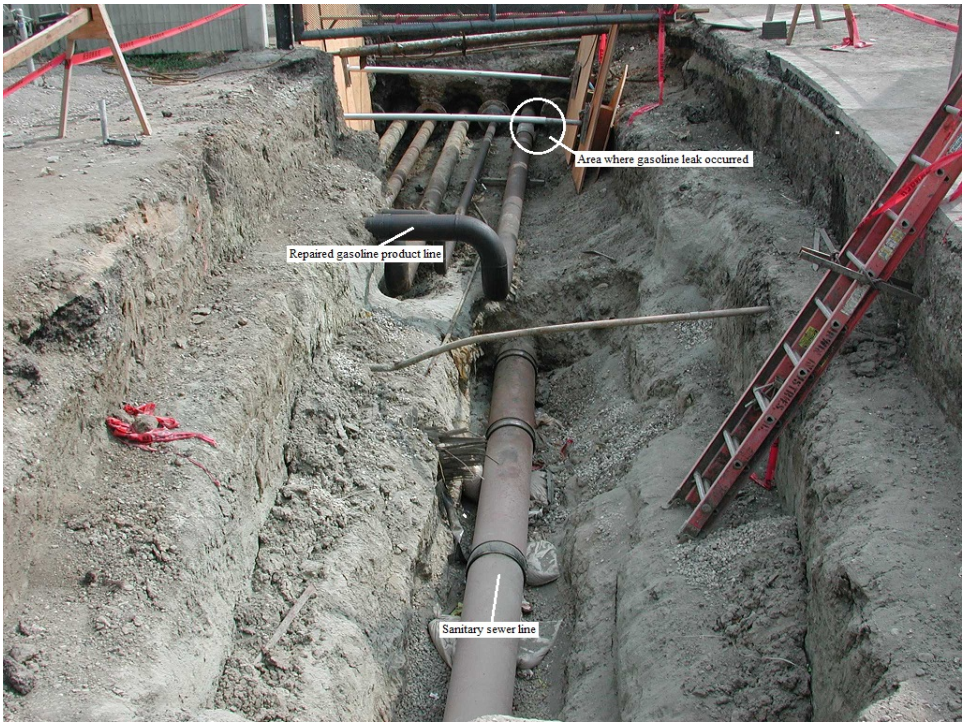

Figure 3: 2002 photo of the excavation where a gasoline product line leak was repaired to prevent gasoline seeping into an adjacent domestic sewer line causing significant periods of elevated explosivity in both the ExxonMobil sewer line and the downstream J.O.' D' trunk sewer.

Investigations on 5-7-14 by Senior I.W. Inspector Bill Barnum and company operators found no evidence of further elevated explosivity readings in the domestic sewer line in question. Wastewater in the line appeared consistent with domestic waste and Barnum concluded the likely source of the elevated explosivity found on 5-6-14 was degrading solids that were subsequently flushed down the line. Due to the history of this connection, refinery operators and Sanitation Districts' industrial waste inspectors will continue to monitor the manhole for any recurrence of product leaks entering the sewer system.

Synergy Oil & Gas in Long Beach Power Outage

While making a routine inspection at Synergy Oil & Gas, LLC on Wednesday, 5-14-14 at 1600 hours, Senior I.W. Inspector Kent McIntosh learned that there had been a power failure at about 0930 hours that same day due to a fire across the street. The company's wastewater handling and monitoring equipment, including the wastewater pumps and treatment system, recording instruments, and all production wells had stopped working. The discharge to the sewer also ceased. McIntosh contacted Long Beach Main Pumping Plant (LBMPP) operators and was told the telemetry link which allows Sanitation Districts' operators at the LBMPP to remotely shut off flow at the Synergy facility due to high LEL conditions at the downstream Marina Pumping Plant #2 had been lost about 1000 hours.

Synergy Oil & Gas, LLC IW 21422 546,000 GPD
6433 E. 2nd St.
Long Beach, CA 90803

On 5-15-2014 McIntosh conducted a follow-up inspection where it was found that partial power had been restored at the Synergy facility and discharge to the sewer resumed. However, although the discharge monitors had power, the required explosivity meter/recorder was

inaccurate (read 0.4% compared to a field shake jar test result of 18%). McIntosh issued a written notice of violation for failure to maintain required monitoring equipment and required the company manually check and log explosivity levels. The company contact claimed their consultant was scheduled to repair and calibrate the meter the next morning.

On 5-17-2014 McIntosh conducted another inspection, finding the explosivity meter still out of calibration despite notes onsite indicating a consultant had performed a calibration on 5-16-14. It was noted that the LBMPP telemetry link remained offline. By 5-19-14 the explosivity meter had been repaired and calibrated, but the telemetry link remained down. LBMPP operators reported that the telemetry link was finally restored on 6-23-14.

Organic Odor Complaint in Compton

On Tuesday, 5-27-14 at 0845 hours, John Boyd received a telephone call from Compton Yard Wastewater Collections Systems Senior Engineer Darrell Hatch. Hatch reported that a week earlier, on 5-20-14, DeMenno/Kerdoon (DK) in Compton had received a volatile organic compound (VOC) odor complaint from residents living nearby in a mobile home park. DK employees conducted an investigation of the odor source which they attributed to a odors emanating from a 8" local line sewer manhole on Alameda Street just upstream of their industrial wastewater connection (see figure 4 diagram below). On 5-21-14 Mr. Alok Das, DK's Manager of Environmental Engineering, called Sanitation Districts' Safety Analyst Joe McCaffrey, reported their findings and asked if the Sanitation Districts could correct the issue. Das also noted their employees had measured VOC concentrations of 2000-3000 ppm (0.2-0.3%) in the headspace of the manhole. McCaffrey forwarded the request to Hatch. On 5-22-14 Hatch met Das at the DK facility to discuss the situation and begin a Sanitation Districts' investigation of the situation. Sanitation Districts' personnel verified that there was a VOC odor emanating from the local line sewer manhole in question, which is on Alameda Street adjacent to DK. On 5-27-14 Hatch called John Boyd and asked if he could get some information regarding the exact location of DK's I.W. connection point to the local sewer and also asked about the potential for industrial wastewater dischargers upstream of DK that could be the odor source.

DeMenno/Kerdoon IW 2703 150,000 GPD
2000 N. Alameda St.
Compton, CA 90222

Supervising I.W. Inspector David Sanchez coordinated a follow-up investigation by Team 3 Inspectors, led by area I.W. Inspector Chris Mendoza. The investigation determined that the source of the VOC odors was DK's industrial wastewater discharge. DK is a large hazardous waste processing operation that receives and processes waste petroleum oil and similar materials. The industrial wastewater generated from these operations tends to be odorous and of relatively high temperature, though in general the discharges consistently meet Sanitation Districts' imposed limits. There is a long history of odor complaints in the area, which have always been sourced to the DK facility. There are no other known sources for such odors upstream of the manhole in question. In 2011 Sanitation Districts' sewer maintenance operators installed a gas trap valve ("Hatch's hatch") on the connection point of the local line to the Sanitation Districts' trunk sewer at manhole 01 1463 in an effort to limit the migration of headspace gases further downstream. In August 2013, in response to a VOC odor complaint from an elementary school located upstream of DK, the gas trap valve was moved into the local line just upstream DK's I.W. connection point. It is suspected that this change, while serving to prevent odors getting to the school, may have led to the current odor complaints from residents downstream. Sanitation Districts' operators opted to recheck and reseal, where needed, the manholes in the area to try to address the situation. Installation of a second gas trap valve may be pursued if sealing doesn't solve the issue.

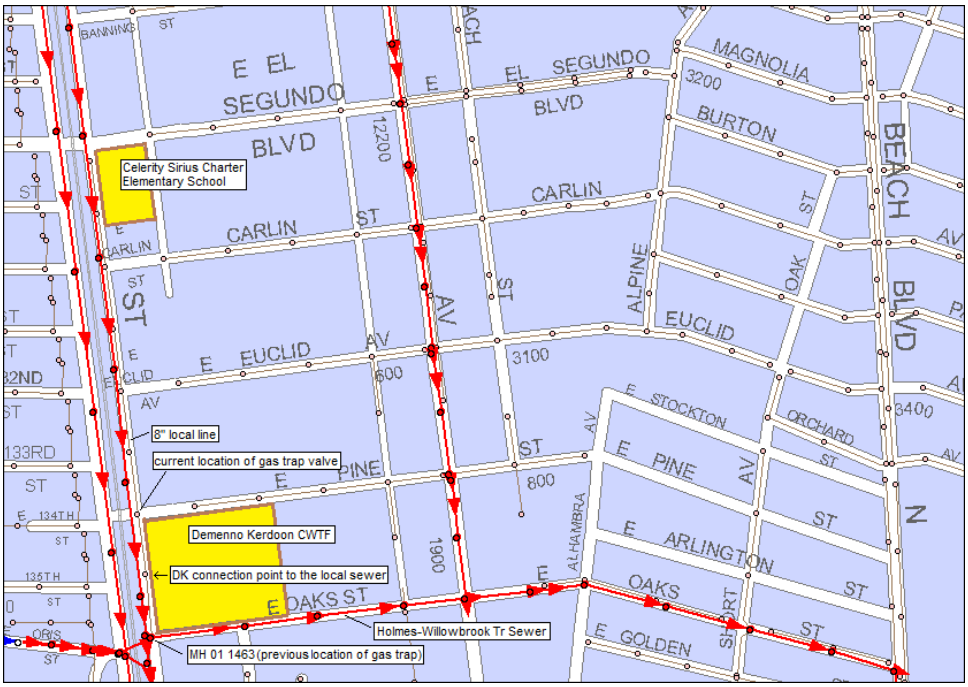

Figure 4: Map indicating the location of the school, the DeMenno/Kerdoon facility, the 8" local sewer line, and the gas trap valve previous and current locations.

<u>Fire in Santa Fe Springs and Coyote Creek Red Color in Long Beach</u>

On Friday, 5-30-14 at 0700 hours, I.W. Inspector Jason Finn heard a radio news report about a large ongoing fire in the City of Santa Fe Springs at Pan Pacific Fiber Inc. The Pan Pacific Fiber site is an unpermitted facility with no known industrial wastewater discharge that collects and recycles waste cardboard and paper. Finn conferred with Senior I.W. Inspector Juan Sanchez and it was agreed Finn would go immediately to the site to assess the situation and determine if there was any potential impact to the sewer collection system or downstream Sanitation Districts' treatment facilities.

Pan Pacific Fiber Facility ID 9248135 0 GPD
14013 Marquardt Ave.
Santa Fe Springs, CA 90670

At 0920 hours Finn called John Boyd and reported that he was onsite at the Pan Pacific Fiber facility. Finn said a large fire had destroyed 3 buildings at the facility and that although the fire had generally been controlled; it was still ongoing with firefighting water having been, and continuing to be, discharged into the storm water collection system. Finn contacted the Fire Department Commander on scene, who stated it would take a minimum of several hours, and possibly a whole day or more, to completely extinguish the fire due to the presence of tightly packed burning bales of cardboard and paper that are very difficult to completely put out. Finn stated there was no evidence any firewater was or would be discharged into the sewer; therefore it was very unlikely any Sanitation Districts' sewerage facilities would be impacted by the event. Finn said company contacts had told him there were no sewer drains in the areas where the fire occurred. At Boyd's request Finn said he would contact the Fire Department commander and inform him that none of the firewater should be collected and discharged to the sewer without first obtaining express permission from the Sanitation Districts to do so. Ultimately all the fire water was discharged into the storm drain with none discharged into the sewer system. Finn noted the runoff had a dark brown-red color, burnt odor, and a pH of 7.

Figure 5: Fire Department heavy equipment working on 5-30-14 to expose and extinguish burning materials in tightly packed waste paper bales at the Pan Pacific Fiber facility. Note the large amount of firewater runoff being generated by this effort.

Figure 6: Storm water runoff channel downstream from the Pan Pacific Fiber facility on 5-30-14. Note the red brown color water due to the fire at the facility.

It was also noted that on 5-30-14 at 1000 hours John Boyd received a call from Sanitation Districts' Lab Biology Supervisor Carlita Barton who reported that while conducting routine

monitoring sampling at 0950 hours that same day, her sampling crew had noted the presence of highly unusual reddish brown water with a "smokey meat" type odor in Coyote Creek just upstream of the Long Beach WRP's discharge point into the creek. An investigation by Senior I.W. Inspector Juan Sanchez and Inspector Traci Stahl determined the source of this unusual water in the creek was the fire at the Pan Pacific Fiber Inc. facility in Santa Fe Springs.

Figure 7: 5-30-14 photo of Coyote Creek looking south about a 0.8 mile upstream of the Long Beach WRP's outfall into the creek. Note the dark color of the water in the creek.

INDUSTRIAL WASTE SECTION
SUMMARY OF ACTIVITIES
FOR THE MONTH OF JUNE 2014

TREATMENT PLANT/SEWER/OTHER INCIDENT INVESTIGATIONS

City of Montebello Sewer Grease

On Tuesday, 6-3-14, I.W. Inspector Jim Percy received a voicemail message from Jesus Salazar, Operations Director for the Montebello Town Center shopping mall. Salazar reported information about a local sewer line blockage and overflow (SSO) on 5-22-14 caused by excessive greasing. The Sanitation Districts' industrial waste inspection staff investigated an incident of excess grease found in a Sanitation District's trunk located downstream of this same area in March 2013. That investigation found no definitive source for the grease, but evidence strongly suggested that restaurants in the mall's food court were the likely source. In response to that finding, Percy gave restaurant grease management posters to Salazar with the understanding they would be distributed to food court restaurant operators in an attempt to curtail the amount of grease entering sewers there.

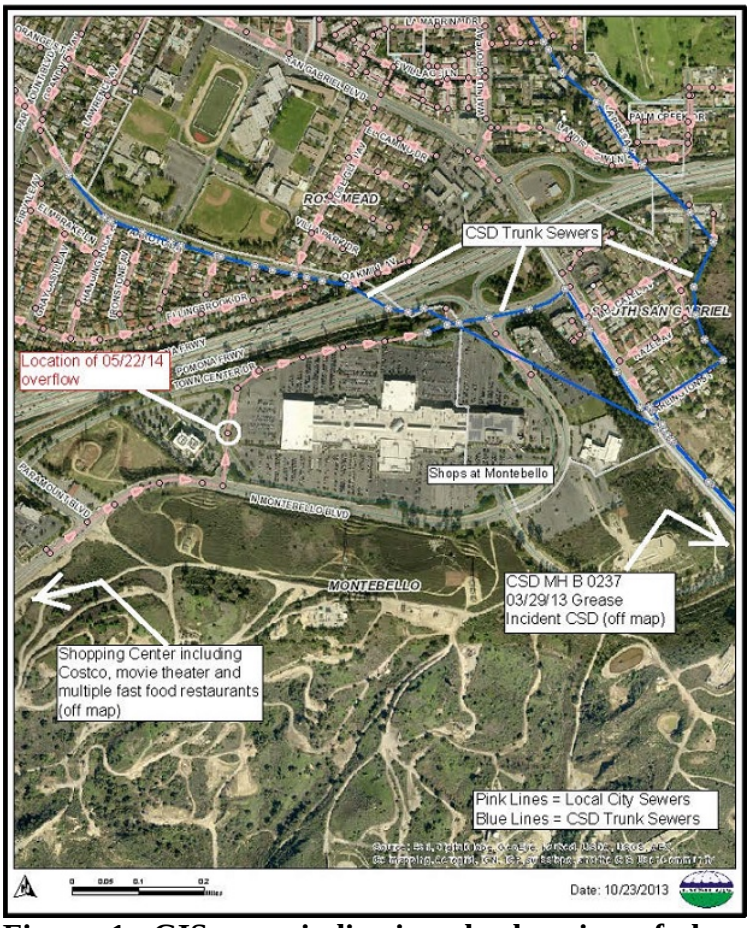

Figure 1: GIS map indicating the location of the local line SSO on 5-22-14, the excessive greasing in the downstream J.O. 'B" Unit 1D trunk sewer found in March 2013, and possible grease sources in the area.

On 6-5-14 Percy spoke with Danilo Batson, the Director of Public Works for the City of Montebello. Batson said he was aware of the 5-22-14 SSO and that it had occurred due to grease

buildup in the line. He didn't seem to have a plan of action moving forward and indicated that he hadn't been in his current position very long. Percy offered to supply him with restaurant grease management posters for the theater complex area fast food restaurants, which now appear to be the more likely source of the grease as opposed to the restaurants located in the mall's food court area. Batson accepted the posters and said he'd convey them to the theater complex area restaurants. Percy informed Batson that the city is responsible for inspecting and monitoring restaurants for compliance with grease discharge control requirements. Percy suggested the city establish a restaurant inspection program to verify grease traps are in place at restaurants and being properly maintained.

J.O. 'C' Solvent Odor and High Temperature Wastewater in Long Beach

On Tuesday, 6-10-14 at 0923 hours, Compton Field Office Civil Engineer Julio Fernandez emailed John Boyd and reported that the Sanitation Districts' crown spray contractor, Nor-Cal Pipeline Services, had noted an unusual "solvent" odor and high temperature wastewater at MH 03 C 0604 in Long Beach at 0920 hours while performing trunk sewer crown spraying. Night team Senior I.W. Inspector Kent McIntosh, along with night team I.W. Inspectors Andy Woods and Neil Tran, as well as day shift I.W. Inspectors Jason Finn and Sanjay Patel, investigated the report. They were unable to confirm the presence of solvent odor at MH 03 C 0604, but they noted a distinct petroleum odor present in the manhole headspace and the wastewater did have an elevated temperature (90° F). The investigation identified the source of the odor and high temperature wastewater to Oil Operators, a permitted industrial discharger located about 0.6 mile upstream in Signal Hill. Oil Operators discharges treated brine wastewater from oil field well producing operations that has a petroleum odor and high temperature (134°F). This discharge was checked and found to be in compliance with their I.W. permit limits for explosivity and temperature (limit is 140 °F). It is suspected that the solvent odor reported by the contractor was actually the petroleum odor typical of the wastewater discharged by Oil Operators. No further action is anticipated at this time.

Oil Operators Incorporated IW 14693 225,000 GPD
2700 Olive Ave
Signal Hill CA 90755

High Explosivity on J.O.'B' Unit 1A at Manhole 08 B902 in Carson

On Monday, 6-9-14 at 1405 hours, and again on Monday, 6-30-14 at 1400 hours, Supervising Engineering Technician Albert Steele of the Wastewater Collection System Section at the Compton Field Office notified John Boyd of 100% headspace explosivity findings at MH 05 B902 at 1337 hours and 1345 hours, respectively. This manhole is on the J.O. 'B' Unit 1A trunk sewer just upstream of the JWPCP headworks. This location is frequently reported by Steele and his staff for explosivity readings in excess of 20% (19 reports thus far in 2014, 18 in 2013, and 29 in 2012) with most readings above 60%. Long term investigation of these reports by the I.W. inspection staff, led by Supervising I.W. Inspector David Sanchez, Senior I.W. Inspector Bill Barnum, and night team I.W. Inspector Andy Woods, have not identified any industrial sources as the cause of the elevated explosivity readings. MH B902 is located on the upstream side of a large siphon structure on the 144" diameter J.O. 'B' Unit 1A trunk sewer. Sampling and analysis of headspace gas samples from MH B902 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 that is being trapped in the line by the siphon structure.

In addition, on 6-30-14 at 1720 hours while investigating the high explosivity report at MH B902, Woods was informed by JWPCP STPO II Mark McKnight that there had been 69% explosivity at the JWPCP J.O. 'B' headworks structure at 1500 hours that day that hadn't been

reported to I.W. staff. Plant data indicated the high explosivity readings at the headworks lasted about 3 hours on 6-30-14.

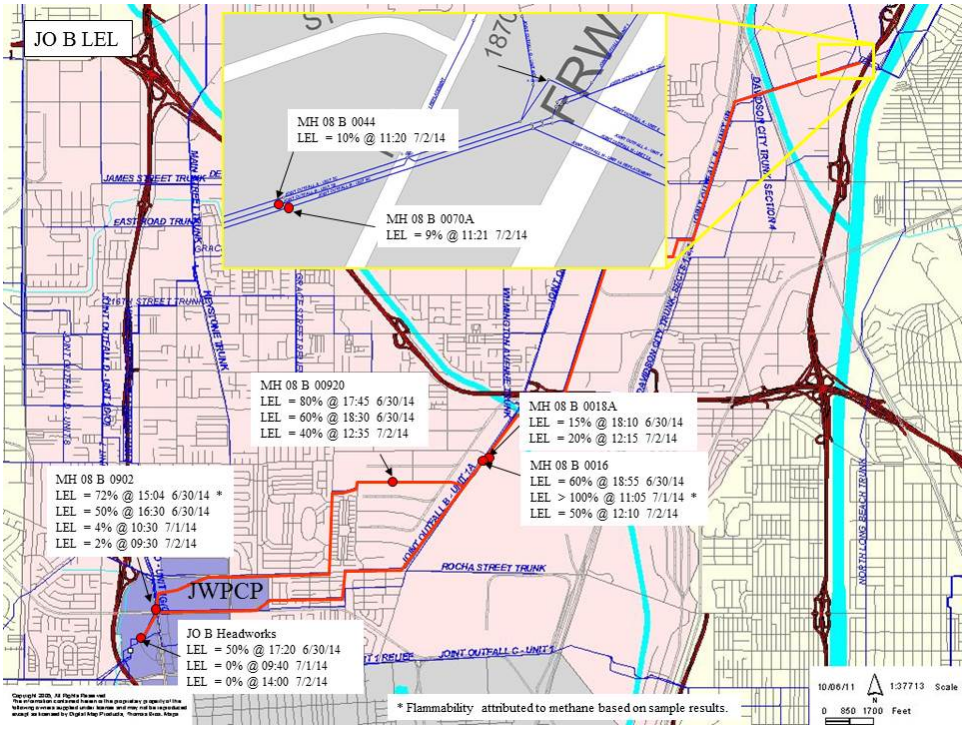

Figure 2: Diagram showing the J.O. 'B' trunk sewer with annotations of explosivity readings obtained at various manholes during the investigation.

It is unknown if the three-hour high explosivity excursion at the J.O. 'B' headworks on 6-30-14 was caused by an industrial source or from methane generated by anaerobic decomposition of sewage solids as seems likely for the high readings at MH B902. The short duration and more unusual high readings at the headworks are more indicative of an industrial source. However, inspections at the large Tesoro petroleum refinery (formerly BP/Arco) and a large oil production field upstream of the headworks that constitute the most likely sources for such an incident were inspected and ruled out as contributors. Though no samples were collected during the incident, an upstream sample collected two hours earlier at MH B902 and a sample collected at MH B0016 the following morning found that methane was the sole constituent causing high explosivity in those structures. An upstream survey of the J.O. 'B' trunk sewer found that explosivity readings from 40% to greater than 100% in the two J.O. 'B' reaches downstream of the Dominguez Channel siphons (see figure 2 above). From this siphon the lines run full for approximately 2 miles upstream to Rancho Dominguez. Upstream of the full pipes the explosivity was from 9% to 10%. It was also noted that both J.O. 'B' lines are currently active: the J.O. 'B'-1A replacement and J.O. 'B'-1A, which is normally out of service. It is not known how long this condition has been present, or what its effect on headspace explosivity levels would be. However, a large diameter trunk sewer running at half its usual flow could potentially accumulate solids that would exacerbate any methane generation.

I.W. Inspectors suspect that the explosivity excursion at the headworks may have been caused by an operational condition at the headworks, such as a service interruption by the air blowers for the central odor control system. However, JWPCP operators state this didn't occur. Ultimately the incidents didn't interfere with JWPCP operations and explosive gases were not detected beyond background ranges at the Secondary Reactors. I.W. Inspectors continue to remain very vigilant in response to these explosivity reports.

Milk Spill at Saputo Cheese in South Gate

On Thursday, 6-26-14 at 1207 hours Environmental Coordinator Maria Hernandez with Saputo Cheese in South Gate (IW#14716) called John Boyd and reported that the company had a 625-gallon milk spill earlier that day from 0330-0355 hours. She stated the spill occurred at milk silo #4 due to a hatch gasket failure during the transfer of milk from silo #4 to silo #3. Operators estimated 5400 lbs. (625 gallons) of milk was lost to the sewer as a result of the spill. There was no known adverse impact on downstream sewers or treatment plant (JWPCP) operations. Hernandez estimated the value of the milk lost at about $1200. She explained that once the gasket failed, there was no way to stop the leak until the combination of the transfer process and complete draining of the tank due to the leak/spill was finished.

Saputo Cheese USA, Inc. IW 14716 204,900 GPD
5611 E Imperial Highway
South Gate, CA 90280

Night team I.W. Inspector Andy Woods conducted a follow-up inspection at the facility late on 6-26-14. He verified the essential facts, with minor exceptions, of the spill noted above by speaking with the supervisor who had been on duty at the time of the spill. According to this contact, raw milk was being transferred or pumped from a reserve silo into silo #4, which is a routine operation. Silo #4 holds approximately 38,000 gallons of milk. As the volume of milk increased in silo #4, a leak developed from the bottom access hatch door. This hatch door opens into a clean production room having floor drains with screens. Floor drains here normally serve to drain sanitation wash water, which outlet to the company's wastewater pH neutralization system. The contact said the leak was detected almost immediately, but the pumping action had to be reversed in order to reduce the head in the silo thus stopping the leak. Eventually Silo #4 was completely pumped out in order to repair the seal. Based on the difference between beginning and ending volumes, the contact estimated approximately 625 gallons of raw milk was lost to the floor drains. The leaky seal was attributed to a careless employee not fully locking the hatch door.

INDUSTRIAL WASTE SECTION
SUMMARY OF ACTIVITIES
FOR THE MONTH OF JULY 2014

TREATMENT PLANT/SEWER/OTHER INCIDENT INVESTIGATIONS

California Dairies High COD Discharge Request

On Monday, 7-7-14 at 0700 hours, Los Coyotes WRP STPO, Stephen Johnson (Johnson), left a voice mail message for Supervising I.W. Inspector David Sanchez indicating he had been contacted by California Dairies, just after midnight on Monday, 7-7-14 asking for permission to discharge 47,000 gallons of industrial wastewater with a chemical oxygen demand (COD) concentration above their limit of 1250 mg/l. Johnson had been contacted at home by operators at the Long Beach Main Alarm Center after the caller from California Dairies, Facilities Superintendent Bob Wheeler, told the Alarm Center operator that the wastewater from his facility was upstream of the Long Beach WRP. Operators opted to call Johnson instead of making a call to Supervising I.W. Inspector John Boyd, which would have been the standard operating procedure under the circumstances. Johnson called Wheeler back immediately and advised him to contact the Sanitation Districts with his request again at 0700 hours the next morning. California Dairies then opted to begin discharging the potentially off-spec wastewater to the sewer in 5,000-gallon 15-minute batches every hour in an attempt to both allow them to bring their pretreatment system back online and minimize the chance of impacting the LBWRP. The company justified this decision by noting that although their analyzer indicated the COD was above the limit, it in reality probably met it. They based this on their opinion that polymer added into the wastewater being pretreated was causing the COD analyzer to read high, not high strength wastewater.

California Dairies, Inc. IW 5124 300,000 GPD
11709 E Artesia Boulevard
Artesia CA, 90701

A follow-up investigation on 7-7-14 at both California Dairies and the LBWRP by area I.W. Inspectors Steven Lajkowicz and Jason Finn revealed the initial request for the discharge was caused by pretreatment system operator error at California Dairies. Their operator added too much polymer and coagulant when starting up the system, causing the dissolved air floatation system to become overloaded. The LBWRP did see a slight, short term, COD concentration increase possibly as a result of the discharge from California Dairies, but such short duration increases are relatively common according to WRP TPOs making it difficult to attribute the increase observed solely to the discharge from California Dairies. California Diaries was not cited for any violations and no NPDES violations occurred at the LBWRP. Boyd spoke with LBMPP Alarm Center Supervisor Jeff Masters to insure any future calls of this nature are routed to Boyd instead of WRP operators.

Saputo Cheese Whey Release in South Gate

On Tuesday, 7-8-14 at 1120 hours, I.W. Coordinating Inspector Shawn Cleaver received a phone call from Environmental Coordinator Maria Hernandez of Saputo Cheese USA in South Gate stating that the company had released approximately 40,000 pounds (5000 gallons) of waste whey solution to the sewer earlier that morning. The company intentionally decided to release the whey as a result of a power failure at the facility. The release began at approximately 0530 hours and lasted until 0830 hours on the same morning.

Saputo Cheese USA Inc. IW 14716 204,900GPD
5611 E. Imperial Highway
South Gate, CA 90280

Area I.W. Inspector Greg Neunsinger responded to the call and issued a notice of violation to Saputo Cheese for discharging unpermitted waste to the sewer without prior

notification and approval from the Sanitation Districts. Fortunately there were no reported effects from the discharge to either the collection system or the downstream treatment plant (JWPCP). Neunsinger noted the company had clearly violated both slug discharge control regulations and the general requirements of their discharge permit. Neunsinger discussed the violation with company contacts, including other more appropriate actions that could have been used to dispose of the waste, such as hauling it to a licensed treatment, storage, and disposal facility (TSDF).

Low pH in Santa Fe Springs Local Sewer Line

On Tuesday July 8, 2014, at about 1150 hours, CSD Compton Field Office, Albert Steele, reported a low pH (4.2) found on a local line immediately upstream of MH 18 0884 on the South Whittier Trunk in Santa Fe Springs. Steele reported a pH of 4.5 at the first local line manhole east of Carmenita Road on the trunk, where Sanitation Districts' Manhole (MH) 18 0884 is located.

An investigation by area I.W. Inspector Jason Finn identified no source(s) for the incident. No evidence of wastewater with a low pH was found at the very limited number of industrial facilities four (4) that are located upstream of the manhole. In general, these facilities were essentially dry warehousing operations that typically would have little call to generate or discharge acidic waste. Inspectors will continue to be vigilant to any possible low pH wastewater sources in the area.

Azteca Dye & Laundry Sewer Blockage in Compton

On Friday, 7-11-14 at 1200 hours, I.W. Engineer Kai Kuo received a call from Mr. Robert Valencia, Plant Manager at Azteca Dye & Laundry in Compton. Mr. Valencia reported that the local sewer downstream of their I.W. Connection was blocked and they were unable to discharge. Area I.W. Inspector Chris Mendoza was contacted by I.W. Permit Supervising Engineer Linda Shadler and responded to the facility to investigate.

Azteca Dye & Laundry I.W. 20638 72,000 GPD
3111 N Alameda St.
Compton, CA 90222

Azteca Dye & laundry is located at the terminus of a Compton local line sewer. Examination and cleaning of the local line by a city sewer maintenance crew found the line was blocked by the accumulation of rags and lint. Other industrial facilities located downstream of the Azteca connection were found to be small shops with very little wastewater discharge and a very low potential for discharging rags and lint that could have contributed to the blockage cause. Therefore, all the rags and lint in the line that caused the blockage appear to be from Azteca. Azteca subsequently cleaned the lines inside their facility, their I.W. clarifier, and the house connection line that runs from the clarifier to the local sewer. These actions resulted in the blockage being completely removed and normal operation of both the local sewer and Azteca's textile dyeing and washing operations resuming. Valencia stated he would install two new finer mesh lint screens, as well as clean the clarifier and lint screens more frequently to prevent this situation from recurring. Inspector Mendoza issued the company a verbal warning for causing the sewer line blockage. The City of Compton has opted not to pursue cost recovery for clearing the local sewer line. Mendoza will perform periodic follow-up to inspections to insure the company continues to properly maintain their clarifier and lint removal screens, as well as make the planned improvements.

Ralphs Digester One-Time Discharge Request

On Wednesday, 7-9-14, Environmental Engineering Consultant Ryan Begin contacted I.W. Engineer David Sonboli on behalf of the Ralphs Grocery Company in Compton to request the company be allowed to haul to JWPCP approximately 600,000 gallons of high strength slurry material generated as feedstock for their anaerobic digester. Methane generated in the digester feeds a cogeneration system that partially powers their facility. The facility is a very large grocery warehousing and distribution operation with a large dairy processing operation as well. Excessive foaming in their 2-million gallon digester caused the company to cease inputting the feedstock into the digester and the company needed a place to dispose of it. Sonboli consulted

with John Boyd and I.W. Section Head Dave Snyder about the request and it was agreed Snyder would contact JWPCP Operations Manager Ken Rademacher about the potential to receive the feedstock in 5000-gallon trucked loads to either the JWPCP LWDS or directly into Districts' anaerobic digesters at the JWPCP.

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

Before a determination could be made on the above request, Mr. Begin recontacted the Sanitation Districts on the morning of Friday, 7-11-14 to change the request. Begin now proposed not hauling the slurry feedstock to the JWPCP, but instead discharging approximately 500,000 gallons of digester sludge diluted with wastewater from the dairy processing operation into the sanitary sewer at their Compton facility for the purpose of emptying the digester tank so that it could be brought back into service using fresh bacteria seed. This request was approved with some limiting conditions and requirements, such as limiting the flow rate from the digester to 50 gpm and continuously sampling the discharge to insure the Sanitation Districts would be properly compensated for the discharge. Sanitation Districts' managers and engineers determined the JWPCP and the collection system would be able to handle the flow without any adverse impact(s).

Numerous field inspections by Senior I.W. Inspectors Bill Barnum and Kent McIntosh, as well as area I.W. Inspector Tingting Wei, were conducted over the following several weeks to monitor the discharge to insure that all requirements were met and that there were no adverse impacts on the collection system and JWPCP operations. As of the end of July, discharge from the digester was winding down and Ralphs was in the process of planning how to bring the digester system back on line. The digester operation is a unique facility in the United States in terms of its size. It receives and processes out-of-date produce, meat and other perishable items from hundreds of Ralphs and Food-for-Less supermarkets in the Southern California area.

Figure 1: 2 MGD digester tank at the Ralphs' facility in Compton. Note dark staining on the side of the tank where foam from the tank has overflowed.

Beach Avenue Pumping Plant High TDS Inquiry

On Monday, 7-14-14 at 0715 hours, Sanitation Districts Supervising Engineer Ajay Malik of the Sanitation Districts' Wastewater Collection Systems' Compton Field Office contacted John Boyd and inquired about possible high TDS industrial wastewater sources influent to the Beach Avenue Pumping Plant in Inglewood. Malik explained that about a year ago a new magnetic flow meter was installed on the pumping plant's discharge line as part of rebuilding the pump plant. The flow meter was to be used to measure the performance of the new pumps. Malik stated the new mag meter has not worked well and he was now in investigating why. The mag meter's manufacturer has stated it could be due to high TDS flows interfering with the meter's ability to measure the flow accurately. Malik asked if the I.W. Section was aware of any possible or known high TDS sources of industrial wastewater influent to the pumping plant.

Boyd spoke with Senior I.W. Inspector Bill Barnum about Malik's inquiry. Review of Sanitation Districts' geographic information system (GIS) data regarding dischargers upstream of the Beach Avenue Pumping Plant, as well as I.W. Inspectors' knowledge of the upstream area, found no indication of any industrial wastewater source(s) with unusually high TDS wastewater influent to the pumping plant. The only I.W. permittee upstream of the pumping plant is Rocker Brothers Meat & Provision (IW#16752), a small, non-significant, meat butchering and distribution facility that dischargers 2800 gpd of industrial wastewater from cleanup operations. There is also a small electroplating facility, Supreme Plating (IW#20822), near the pumping plant. However, its discharge isn't influent to the pumping plant, thus while its wastewater can have an elevated TDS, it is not a source for this incident. It was also noted that there are no known oil producing operations ("brine fields") which discharge to the sewer in the areas tributary to the pumping plant.

The above information was conveyed to Malik by Boyd at 0900 hours on 7-14-14. Malik thanked the Industrial Waste Section for their input and said he would continue to investigate other possible causes for the flow meter problem at the pumping plant. No further investigation by IW personnel into this matter is anticipated.

Concrete-like scale in the Puente Trunk Sewer in Commerce

On Wednesday, 7-23-14 at 0755 hours, San Gabriel Yard Superintendent of Sewer Maintenance Bill Balas called John Boyd. Balas reported that on 6-21-14, while conducting routine quarterly cleaning of a 18" double barrel siphon on the Puente trunk in the City of Industry where the lines pass under the Puente Creek on Proctor Avenue (MHs 15 0043-0040, see Figure 3 below), a Sanitation Districts' crew had encountered difficulty cleaning the siphon. The bag being used to clean the siphon encountered higher than expected levels of resistance in the siphon barrels before successfully passing through. Subsequently, on 7-21-14, the crew noted what appeared to be concrete scale-like debris in a manhole downstream of the siphon (MH 15 0029). The material found at MH 29 was ostensibly one continuous piece of material that was lightly adhering to the bottom of the siphon lines that the sewer cleaning bag dislodged and broke up during the line cleaning process.

Figure 2: GIS sewer trace indicating the areas tributary to the siphon structure where the scale material was dislodged.

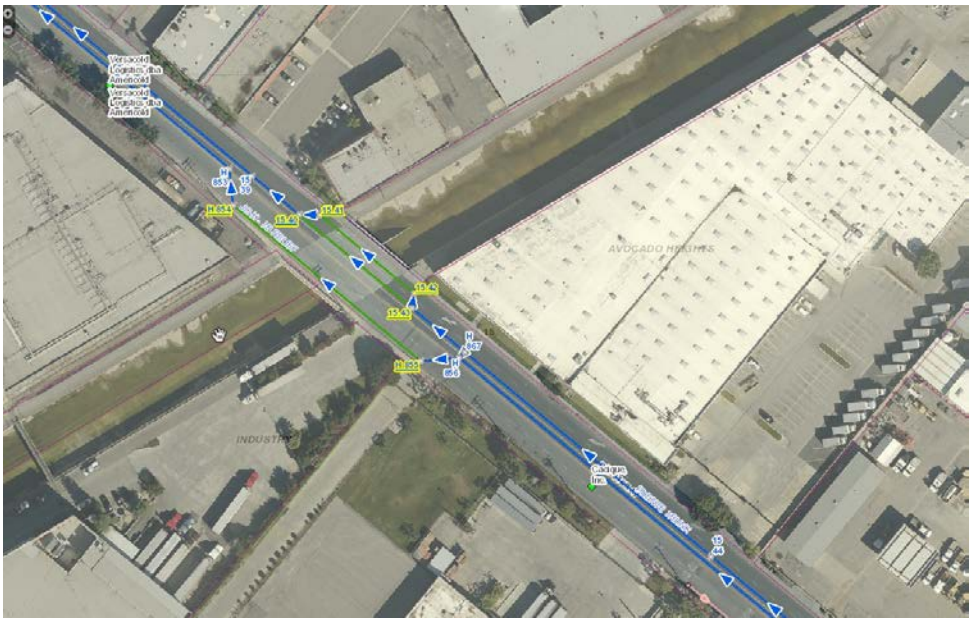

Figure 3: The double barrel siphon of the Puente Trunk where it passes under Puente Creek in the City of Industry.

Figure 4: Sample of the scale like material found at MH 29 in the Puente Trunk on 7-21-14.

Senior I.W. Inspector Steve Sealy, as well as Area I.W. Inspectors Anie Kellzi and new I.W. Inspector Nguyen Dang, investigated this incident. The scale-like material didn't appear to Sealy to be concrete, but some other type of light-weight material with fiber content. The material was gray, soft, crumbled easily, and reacted with hydrochloric acid. Samples were submitted for lab analysis to determine its exact nature. 11 industries were inspected as possible sources for the incident. One, General Sealants, an unpermitted manufacturer of rubber sealants which contain calcium carbonate among its ingredients, was inspected by Kellzi. She noted

waste from their manufacturing processes had a similar appearance and texture to the material removed from the sewer. She took a sample of it to compare it to the sewer scale. Managers at General Sealants claimed the waste material was not sewered, but instead reused as an ingredient in a lower quality product.

It was also noted that over the past year the stretch of Proctor Avenue upstream of the siphon was completely torn up and resurfaced from bare dirt. It's unknown if this construction might also be responsible for the material found in the sewer. Inspectors continue to investigate and are awaiting lab test results for the scale material and the material from General Sealants.

JWPCP Liquid Waste Disposal Station Off-Spec Load Rejection

On Wednesday, 7-23-14 at 1100 hours, JWPCP LWDS attendant Bob Smith called John Boyd and reported that a 4500-gallon load of blue-colored industrial wastewater generated by Blue Cross Labs in Santa Clarita had just been brought to the LWDS by Miles Chemical Company (a waste hauler) that had a TDS level of 12,930 mmhos/cm and a pH of 2.5. The TDS reading is somewhat above the guideline maximum of 11,000 mmhos/cm applied to loads from Blue Cross Labs, but the Sanitation Districts have been recently accepting such loads with a TDS of up to 18,000 mmhos/cm as the guideline has been found to be too low due to laudable waste minimization efforts implemented by Blue Cross Labs. The guideline maximum is currently in the process of being revised to reflect this. However, the pH reading of 2.5 is significantly out of compliance with the limit that requires it be between 6.0 and 10.0. Boyd instructed Smith to reject the load, which he did. Note that Blue Cross Labs is one of a very small number of facilities that has an industrial wastewater discharge permit that allows them to haul loads of I.W. to the JWPCP or Pomona LWDS for disposal. The permit was granted to address the fact that their highly colored and high TDS I.W. generated from making their blue "tidy bowl" type product had historically been responsible for NPDES discharge violations at the Sanitation Districts' Saugus WRP that would receive the flow if it were discharged into the sewer at their Santa Clarita facility.

Blue Cross Laboratories Inc. IW 11147 450 GPD
20950 Centre Pointe Parkway
Santa Clarita, CA 91350

Santa Clarita area I.W. Inspector Peter Carlstrom conducted follow-up. He found the rejected load was ultimately disposed of legally at a commercial disposal facility in the City of Vernon. The low pH load from Blue Cross Labs likely resulted from insufficient caustic addition combined with poor mixing during their neutralization pretreatment process. Both the pre-neutralized sample from Blue Cross Labs' wastewater tank and the sample from the tanker retained by Miles Chemical measured an identical pH of 4.2. Blue Cross Labs reports frequent minor pH discrepancies between their measurements and those of LWDS. To prevent future loads having a pH below 6.0, Blue Cross Labs' managers stated they are exploring installation of a fixed pH meter and mixer on their wastewater tank for better pH control and more consistent adjustment. There was no evidence found that any prohibited industrial waste had been mixed into the rejected load by either Blue Cross Labs or Miles Chemical Co.

INDUSTRIAL WASTE SECTION
SUMMARY OF ACTIVITIES
FOR THE MONTH OF AUGUST 2014

TREATMENT PLANT/SEWER/OTHER INCIDENT INVESTIGATIONS

JWPCP Liquid Waste Disposal Station Off-Spec Load Rejection

On Friday, 8-1-14 at 1035 hours, JWPCP LWDS Attendant Paul Adams called John Boyd and reported that a 6300-gallon load of claimed septic waste hauled to the LWDS by Ely Jr. Pumping Company had a low pH of 4.2. Acceptance criteria for such wastes include that the pH must be of between 6.0 and 12.5. The load had an otherwise normal appearance, odor, and TDS (2430 mmhos/cm) for septic waste. The load manifest indicated the load came from the Malibu Country Mart located at 3822 Cross Creek Road in Malibu.

Area I.W. Inspector Michael Placencia and Senior I.W. Inspector Bill Barnum followed up on the rejection. Their investigation determined the sources of the rejected load were actually a combination of septic tank waste from the Malibu Country Mart and waste from a 7500 GPD membrane bioreactor (MBR) sewage treatment unit located at the Malibu Pier. The MBR is owned by the City of Malibu but operated by a consultant, Integrated Performance Consultants (IPC). This type of sewage treatment unit is slowly proliferating throughout the Malibu area due to lack of a regional wastewater treatment facility and the Regional Water Quality Board prohibiting the use of septic tanks for sewage disposal due to groundwater and runoff contamination issues. There are currently approximately ten such MBR units in the Malibu area according to IPC. The Pier's MBR experienced a plant upset that resulted in low pH anaerobic sludge from its digester tank bleeding back into settling tanks. The MBR operator decided to have the settling tank material removed from the tanks to mitigate the upset condition and the material was subsequently hauled to the JWPCP LWDS for disposal. Ultimately the Ely Jr. Pumping Company neutralized the load using three 50lb bags of baking soda. The load was then returned to the JWPCP LWDS at 0700 hours on Saturday, 8-2-14, accepted, and dumped without incident.

Pomona WRP Blue Color

On Thursday, 8-7-14 at 1445 hours Pomona WRP STPO Mike Barker called John Boyd and reported that at 1440 hours operators had noticed blue colored wastewater entering the WRP from the south line that feeds into the WRP. He said he thought the colored material had just started coming in when it was noticed. Barker described the color as similar to blue Gatorade. He said there was no unusual odor associated with the color and influent pH levels were normal (7). The plant didn't divert flow, but remained vigilant to dissolved oxygen levels in the secondary tanks in case the colored material proved to be high strength. Samples of the material were taken both from primary tanks and the south line manhole just upstream of the WRP.

Figure 1: Pomona WRP raw influent sample taken at 1430 hours on 8-7-14. Note the light blue color of the sample.

Investigation by night team I.W. Inspector Andy Woods, as well as area I.W. Inspector Pat Cashen and Senior I.W. Inspector Steve Sealy, failed to find a definitive source for the blue color. The color only entered the plant for about an hour, making tracing the blue color upstream to a source, or even limiting the influent area to a specific region, impossible. Inspections conducted at the four known industrial color sources upstream of the WRP found no likely or contributing sources. Inspectors remain vigilant to the possibility that an unknown new industry that discharges highly colored waste into the sewer may have moved into the area. Test results indicated the colored material contained no elevated levels of heavy metals and the COD concentration was just above normal at 703 mg/l. There was no impact on operations at the WRP and no NPDES violation occurred.

Valencia WRP Citrus Odor

On Friday, 8-8-14 at 1110 hours, Valencia WRP TPO II Alfonso Vasquez called John Boyd and reported that during regular rounds at 1040 hours operators had noted a light "orange" or citrus odor in the plant at the secondary aeration tanks. All other operational parameters at the WRP were normal and the plant was operating normally. A grab sample of primary effluent was taken by operators at 1040 hours for possible pick-up by I.W. Inspectors should they want to do an analysis.

Area I.W. Inspector Peter Carlstrom investigated the report. He quickly identified Flavor Producers, a flavor manufacturing company located upstream of the WRP as the source. A subjective odor comparison by Carlstrom of the WRP primary effluent sample and a Flavor Producers' sample found them similar, though the Flavor Producers' sample was much higher in intensity. Given the lack of negative impact on WRP operations and that the odor induced at the plant was mild and pleasant, no violation notice was issued to Flavor Producers for the discharge.

Flavor Producers, Inc. IW 17052 2200 GPD
28350 Witherspoon Parkway
Valencia, CA 91355

Heavy Greasing in the East Road Trunk in West Carson

On Friday, 8-15-14 at 0950 hours, Sanitation Districts' Sewer Maintenance Superintendent Doug Walton called John Boyd. Walton reported that in June 2014, while conducting routine sewer cleaning operations at MH 08 0231 on the East Road trunk sewer in the unincorporated area known as West Carson, Sanitation Districts' sewer maintenance crews had encountered heavy white grease. Walton requested I.W. Inspectors locate the source of the grease and facilitate ceasing its discharge to the sewer.

Senior I.W. Inspector Bill Barnum conducted the follow-up investigation, locating two probable sources for the reported greasing. Both sources were restaurants which had no equipment for controlling grease discharges, such as a grease trap or an interceptor. One source, Pit Stop Burgers, had records indicating regular offsite recycling of waste fat and grease. The other source, Discount Beer & Wine Market, was in the process of renovating their kitchen following a change in ownership last month. The new owner claimed all his plumbing was found to be clogged with grease when he acquired the facility. The new owner was given a list of grease recyclers and directed to www.CalFog.org for best management practices for handling fats, oils and grease (FOG) waste. The investigation identified no permitted industrial users upstream of the greasing location and no new sources that would require an I.W. permit. The area is generally residential with some commercial use. Barnum made a telephone referral call to Los Angeles Department of Public Works (LADPW) area Waste Control Engineering Inspector Walter Glowac requesting LADPW evaluate both restaurants for inclusion into their FOG control program. According to Mr. Glowac, Pit Stop Burgers has been inspected for compliance under their storm water permit but there is no inspection or permit history for Discount Beer & Wine Market.

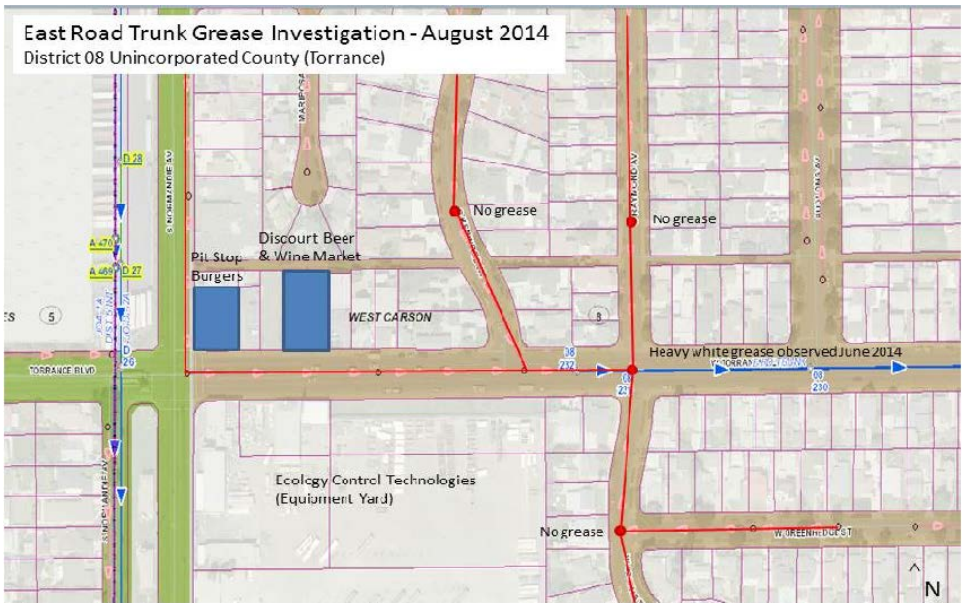

Figure 2: Map diagram indicating the location of the two sources of grease, Discount Beer & Wine Market and Pit Stop Burgers, in relationship to where greasing was found in June 2014 in the East Road trunk sewer.

On 8-21-14 Sanitation Districts' Sewer Maintenance Supervisor Rick Pearce notified Barnum that maintenance operations conducted that day had found no excessive amounts of grease in the East Road trunk in the same locations where excessive greasing had been found in June.

Long Beach WRP Elevated pH

At 1315 hours on Friday August 15, 2014, Long Beach WRP TPO II Patrick Ryan left a voicemail message for Supervising I.W. Inspector David Sanchez, who was on vacation,

reporting an observed elevated influent pH of 8.5. Sanchez did not become aware of the call until he returned to work on 8-20-14. I.W. Inspector Traci Stahl was notified of the incident on 8-20-14 and conducted follow-up.

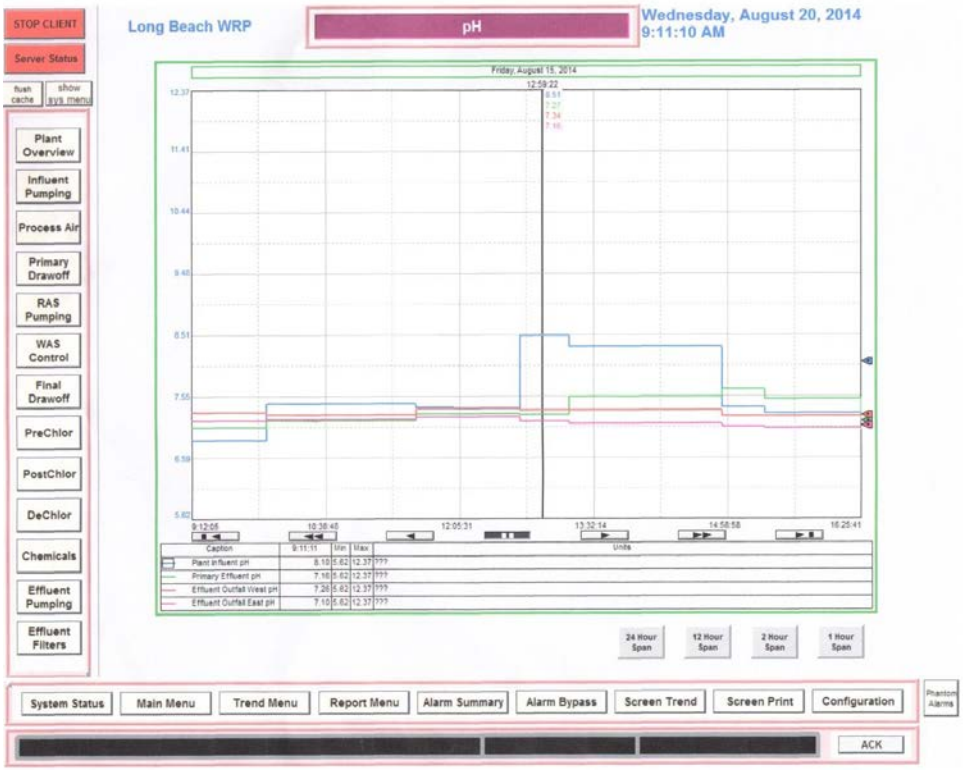

Figure 3: Control screen grab from the Long Beach WRP showing theinfluent pH trend (blue line) on 8-15-14. Note the elevated pH began about 1230 hours, lasted about 2.5 hours and peaked at 8.5.

No industrial source(s) for the elevated pH incident was found. Review of sewer crown spray and caustic addition operations found no evidence these operations were carried out upstream of the LBWRP on 8-15-14. I.W.Inspectors continue to investigate industrial wastewater dischargers that could have caused this incident. Operations staff at Long Beach WRP were also reminded to call extension 2900, when reporting incidents that could industrial waste related.

Health/Hazmat Referral in Commerce

On Wednesday, 8-20-14 at 0815 hours, Los Angeles County Fire Department Health Hazmat Inspector David Aoki called John Boyd. The LACFD Health Hazmat unit is the certified unified program agency (CUPA) for large portions of Los Angeles County including the City of Commerce. Aoki reported that he had recently conducted a site inspection at a company called "Print-N-Copy," located at 4820 S. Eastern Avenue (unit P) in Commerce. The company does various printing operations including the manufacturing of polyester printing plates using an “AB Dick” machine which involves some discharge of possibly corrosive wastewater to the sewer. Aoki stated he had found no violations of CUPA regulations while onsite (chemical storage ok, waste manifests in order), but thought the site might need an I.W. discharge permit. Boyd checked Sanitation Districts' iPACS and mainframe records and found no evidence that the site had ever been inspected or permitted by the Sanitation Districts.

Area I.W. Inspector Jim Percy inspected the facility on 8-22-14. He determined there was no evidence the company had violated any Sanitation Districts’ regulations and was exempt from being required to obtain an Industrial Wastewater Discharge Permit per current Sanitation Districts’ guidelines. The company was documented and is subject to future inspections to monitor for operational changes which could result in a permit being required.

Anonymous Tip regarding a recycling facility in Montebello

On Wednesday, 8-20-14 at 0930 hours Industrial Waste Section Supervising Enforcement Engineer Bill Cheyne received a call from a tipster who requested to remain anonymous. The caller reported that a recycling facility located at 1736 Chapin Road in Montebello was regularly discharging a liquid that ran off their property into the street gutter and storm drain. The caller claimed this liquid was causing the street surface concrete to erode. Using Google maps and iPACS, Cheyne identified the facility as Belmont Fibers; an unpermitted facility that inspection records indicate does dry recycling of cardboard, glass, aluminum cans, and plastic bottles. Sanitation Districts' I.W. Inspectors have responded to two fires at this facility over the last decade; in April 2004 and January 2014.

Belmont Fibers Facility ID 2094274 0 GPD
1736 Chapin Rd
Montebello, CA 90640

Area I.W. Inspector Jim Percy investigated the tipster's claims and found no evidence of damage to streets in the areas adjacent to Belmont Fibers that was consistent with corrosive liquid discharge. The contact at Belmont Fibers stated that there are no liquids used or stored on the property with the exception of water used in their bathrooms. The only liquid storage tank observed onsite was for diesel fuel for onsite use. Percy noted the facility lacked housekeeping, but this condition is essentially normal for recycling operations of this type. The concrete within the property showed wear from the constant vehicle, truck, and equipment traffic, but did not exhibit stains or etching. The surrounding streets didn't appear to show anything beyond normal age-related wear, and compared to the site, were quite clean. Per Inspector Percy's discussion of his findings with Supervising I.W. Inspector Dave Lee, it was decided that a follow-up referral to an outside agency for further investigation of the tipster's claims wasn't necessary.

Los Coyotes WRP Tea Color

On Wednesday 08-20-2014 at 1354 hours Los Coyotes WRP TPO I Araceli Chambers called I.W. Inspector Traci Stahl. Chambers reported a tea color in the effluent forebay and stated the color had been coming in since noon. She said she had also noticed some issues with falling dissolved oxygen (D.O.) concentrations in the secondary aeration tanks, but was doubtful this was related to the color. The WRP operations were otherwise unaffected and influent pH levels were normal. Around 1415 hours, I.W. Inspectors Jason Finn and Steve Lajkowicz used the Secchi disk at the effluent forebay to check water clarity levels. The clarity tested at 9', indicating it was normal. Night team Supervising I.W. Inspector Barbara Jenkins was notified of the incident and coordinated the investigation response.

At 08-20-2014 night team I.W. Inspector Andy Woods spoke with LCWRP TPO II Michael Phan about the incident. Phan stated the WRP had experienced no unusual pH or dissolved oxygen levels during the incident. Operator rounds at 1600 hours had found no color in the effluent forebay. Woods confirmed that the discharge at the forebay was colorless and there was no colored wastewater entering the plant.

Five companies were inspected by Woods, Jenkins, and night team I.W. Inspector Neil Tran as possible sources for the tea-colored wastewater and/or D.O. problems at the LCWRP. No definitive source was identified in either case. Of the five companies, Shaw Diversified Services (carpet manufacturing and dyeing) and Tri-Star Dyeing and Finishing (textile dyeing) are generally considered capable of discharging enough tea-colored wastewater to affect LCWRP operations. Each company is required to retain discrete hourly effluent samples so that I.W. Inspectors can check them should the downstream WRP experience excessive levels of color. Tran inspected both companies. At Shaw, the August 20th 1200 and 1300 hour samples showed tan color, but both passed the company's 20:1 dilution test. There were no color violations for the August 19th samples. At Tri-Star, no color violations were detected in any August 19th or 20th samples. According to Tri-Star production records for August 20th, more than half of their 17 dyeing machines had dyed light colors earlier that day. Ultimately although both companies may have contributed to the tea color seen in the WRP, there was no evidence

found indicating either was the primary source for the color and thus no notice violation was issued to either company. No NPDES violations occurred as a result of this incident.

INDUSTRIAL WASTE SECTION
SUMMARY OF ACTIVITIES
FOR THE MONTH OF SEPTEMBER 2014

TREATMENT PLANT/SEWER/OTHER INCIDENT INVESTIGATIONS

Phillips 66 Oil Refinery Foam Release in Carson

On Wednesday, 9-3-14 at 0840 hours, I.W. Inspector Tingting Wei received an email from Chip Stewart, the Environmental Engineer of the Phillips 66 Company oil refinery in Carson. Stewart stated company operators had observed foam backing up at the plant's wastewater discharge manhole. Stewart reported they had inspected their industrial wastewater pretreatment system and found no issues with its discharge effluent, thus they suspect there may be a problem in the downstream sewer system with foam, a partial blockage, or both.

Phillips 66 Company IW 21079 2,823,000 GPD
1520 E. Sepulveda Blvd
Carson, CA 90745

Figure 1: Thick brown foam overflowing the industrial wastewater discharge manhole at the Phillips 66 oil refinery at 0930 hours on 9-3-14.

Investigation by area I.W. Inspector Wei and Senior I.W. Inspector Bill Barnum found no problems in the downstream sewer collection system. It was determined the foam and overflow at the company's manhole occurred due to a chemical injection malfunction in the oil recovery unit of the refinery's wastewater pretreatment system. The foam was entirely contained on the property of Phillips 66 and the clean-up operation was conducted by the company. Field analysis of the wastewater discharge at the time of the incident indicated compliance with all applicable limits. The foam released into the sewer had no impact on the downstream sewers or the downstream treatment plant (JWPCP).

J.O. 'A' Unit 9 Red Color in Bell Gardens

On Friday, 9-5-14 at 1445 hours, John Boyd received a call from Alex Manesh, Sanitation Districts' Civil Engineer at the Carson Field Office. Manesh reported that while conducting a sewer rehabilitation job in Bell Gardens, Sanitation Districts' contractors had twice recently noticed instances of very dark red/maroon colored wastewater in the 39" J.O. 'A'- unit 9 trunk sewer at MH 02 A1184 located on Eastern Avenue near the intersection with Cecelia Street in Bell Gardens. Manesh reported there were no other unusual characteristics associated with the red-colored flow; the pH was neutral and there were no high temperatures or unusual odors noted. The color was noted from 1000-1200 hours on 9-5-14 and also on 9-8-14 for a similar period of time. Manesh said he wanted to report the finding to the I.W. Section as he thought the highly colored nature of the wastewater was very unusual and thought it might represent the discharge from a previously unknown I.W. source.

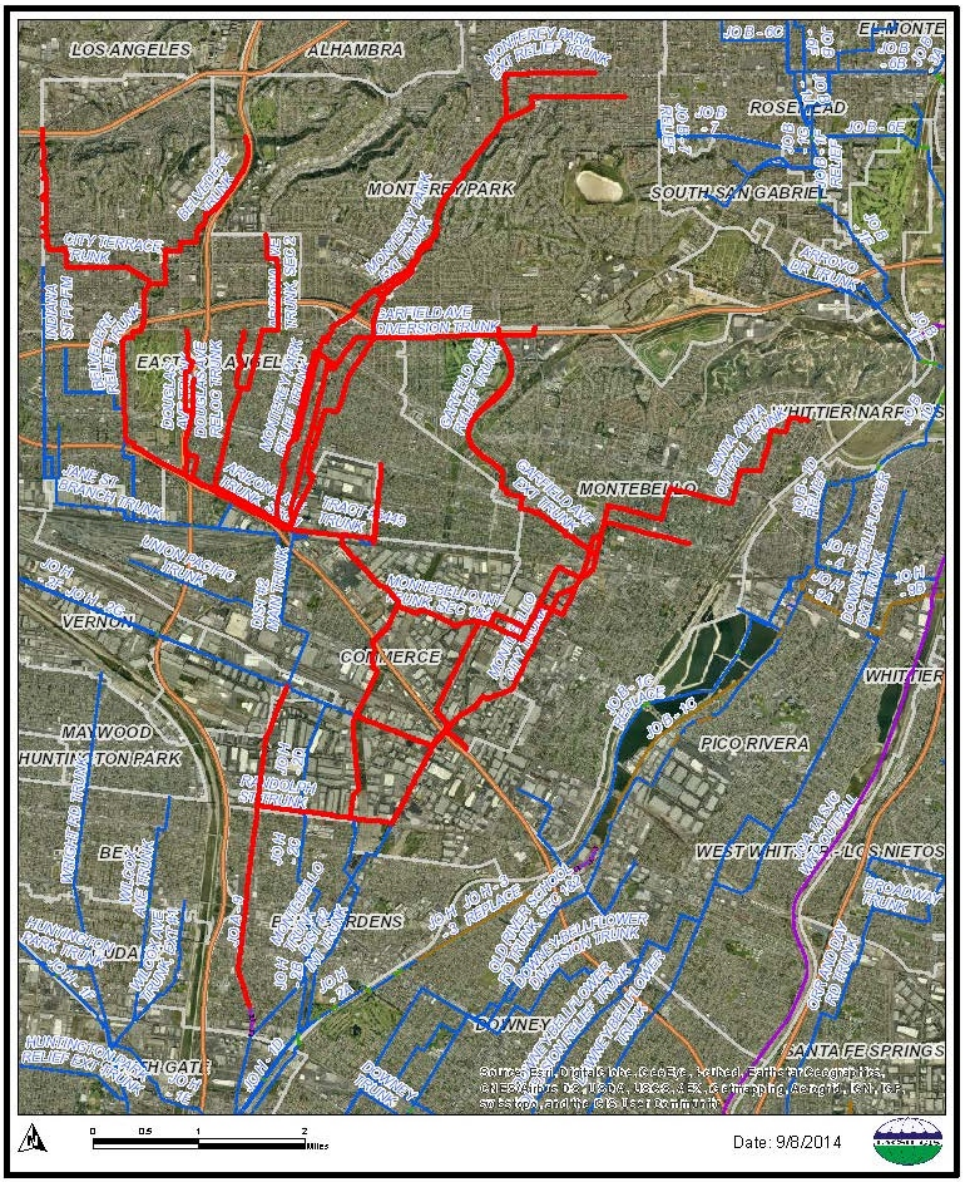

Figure 2: Diagram indicating the trunk sewers (in red) upstream of the reported location of maroon/red color in the J.O.'A' sewer.

Figure 3: Sample of red-colored wastewater taken at Manhole 02 A 1181 at 0855 hours on 9-10-14.

I.W. Inspectors Jim Percy and Greg Neunsinger investigated. On 9-9-14 they met with Manesh and Districts' Construction Inspector Marco Sierra at the site. On Wednesday, 9-10-14 a sample of sewage showing distinct and fairly bright red color was collected at MH 02 A1181 (see figure 3 above). It was tested the following day and the color, which had not settled overnight, was found to disappear quickly and completely upon addition of common household bleach, indicating the color causing material is a dye. Six upstream high color industrial wastewater sources were investigated, including several textile dyeing operations. However, no evidence was found tying any of them to color found in the sewer. Inspectors continue to look for possible sources and will attempt to trace the color upstream to its source if and when an opportunity to do so occurs.

JWPCP Biosolids PCBs

On Wednesday, 9-10-14 at 0830 hours, I.W. Section Head Dave Snyder told John Boyd that Sanitation Districts' Monitoring Section Head Mike Sullivan had reported that the July 2014 JWPCP biosolids analysis had shown much higher than usual concentrations of PCBs (Polychlorinated Biphenols). PCBs are a hazardous and highly toxic material whose manufacture was banned in the United Sates in 1979, though its use continues in the U.S., primarily as an insulating fluid in electrical distribution system transformers and capacitors. Sullivan gave no exact numbers for the biosolids test results but implied the amount found was at least 10 times normal levels, although not in violation of the applicable limit. Sullivan also stated a follow-up sample taken in August was again high in PCBs, though not to the same extent as the July sample.

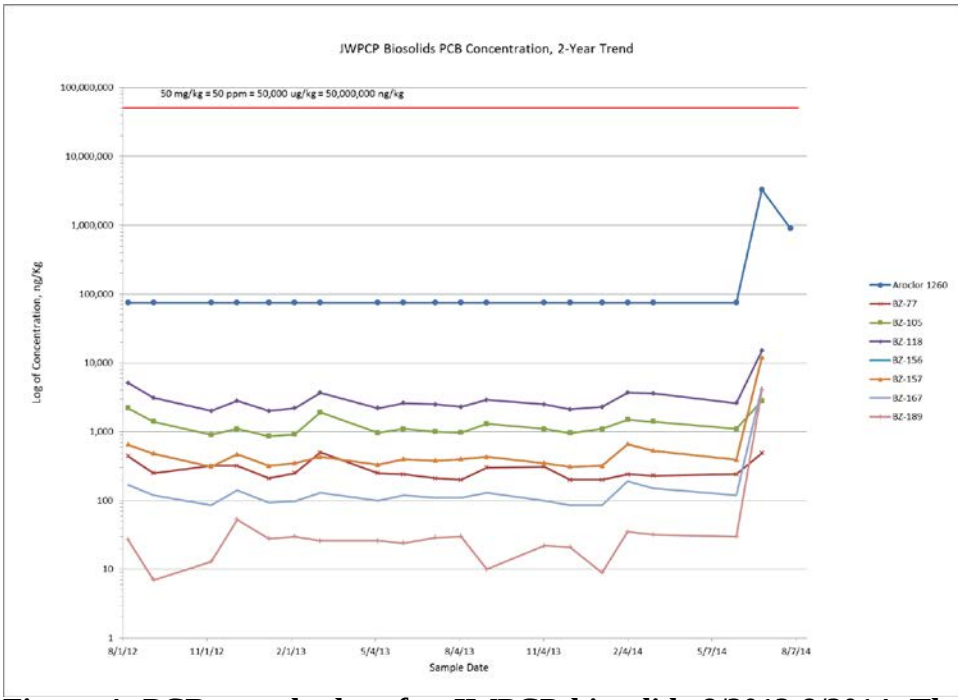

Figure 4: PCB sample data for JWPCP biosolids 8/2012-8/2014. The August 2014 result is preliminary. Note that non-detect results are represented as half the detection limit. Note also that the data is plotted here logarithmically and the limit of 50 ppm is represented by the top red plot line.

No source(s) of the PCBs found in the biosolids have thus been found by I.W. inspectors. Senior I.W. Inspector Bill Barnum and I.W. Inspector Pat Cashen investigated recent sewer cleaning work done on the J.O. 'B'-1A "box sewer" in Carson and J.O. 'D' District 5 Interceptor in Torrance to see if this work could have been the source of the PCBs due to mobilization of historic PCBs in the lines. No evidence was found to indicate the cleanings were the source of the PCBs. Barnum also conducted research into any other known sources of PCBs in Los Angeles County and found the only facility in Los Angeles County permitted by the California State Department of Toxic Substances Control (DTSC) to store, package and ship PCB wastes is the Clean Harbors Los Angeles facility located at 5756 Alba Street, Los Angeles 90058. It is located one block outside the Sanitation Districts' boundaries at the western edge of the City of Vernon. City of Los Angeles'sewer maps indicate the facility is tributary to the Bureau of Sanitation's Hyperion WWTP, not the Sanitation Districts' JWPCP.

In 2013 there were cases of waste PCBs being illegally disposed of by dumping on the shoulder of a major freeway corridor in rural South Carolina and discharge into industrial wastewater clarifiers tributary to the municipal sewer system of Charlotte, North Carolina. These cases are currently under investigation by multiple state and local law enforcement agencies, as well as the Federal EPA. While there is no known connection between the cases in the Carolinas and the finding of PCBs in Sanitation Districts' biosolids, the Carolina cases do serve to indicate that the possibility of someone illicitly dumping waste PCBs into sewers tributary to the Sanitation Districts' collection system can't be discounted. Sanitation Districts' I.W. Inspectors remain vigilant to this possibility.

Gridley Road Interceptor Trunk High Sulfides in Artesia

On Thursday, 9-11-14 at 1056 hours, Sewer Maintenance Superintendent Doug Walton sent an email to John Boyd reporting "very high" (>200 ppm) manhole headspace hydrogen sulfide readings in the Gridley Road Interceptor trunk in Artesia. A data table attached to the email and subsequent conversation with Walton detailed that this trunk, which is relatively new, going into service only about 2 years ago, has been consistently plagued by high sulfides, moderate LEL concentrations (10-15%), and the presence of low levels of carbon monoxide in the headspace. Walton reported these conditions are degrading the sewer line. Walton requested I.W. inspection staff investigate the cause of the condition, mitigate it if possible, and keep him

informed as to the status of the investigation. Supervising I.W. Inspector David Sanchez was notified of the report and is coordinating the investigation response.

Figure 5: 9-18-14 photo of Manhole 19 1313 on the Gridley Road trunk. Note the corroded/degraded condition of the top of them manhole riser.

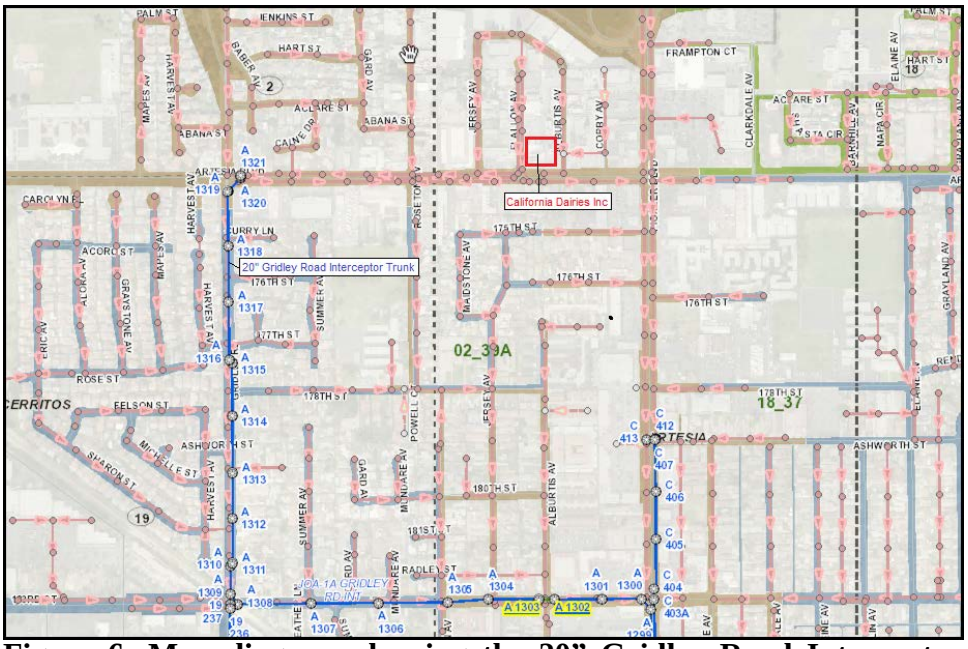

Figure 6: Map diagram showing the 20" Gridley Road Interceptor trunk sewer in Artesia and the location of California Dairies, Inc.

The investigation of the condition in the Gridley Road Interceptor trunk remains ongoing, but preliminary findings indicate the cause is very quick and high intensity biodegradation of the high strength industrial wastewater flow containing milk solids that is typically discharged by California Dairies, Inc. in combination with low flow conditions in the downstream trunk sewer. California Dairies is responsible for a large percentage of the flow in the trunk, perhaps as much as 30-50% at any given time, especially in the early morning hours. I.W. Inspectors issued a written notice of violation to California Dairies for discharging 0.2 mg/l of dissolved sulfides on

9-15-14. However, although the sulfide concentration found in the discharge was over the limit of 0.1 mg/l, I.W. Inspectors strongly suspect the true cause of condition in the trunk is the biodegradation of California Dairies' high strength flow once it enters the trunk, regardless of its concentration at the industrial wastewater legal sampling point on their property.

I.W. Inspectors are working with Sanitation Districts' sewer maintenance engineers and staff, as well as California Dairies' managers, to determine the scope of the problem and any feasible actions which can be taken to mitigate the condition.

California Dairies, Inc. IW 5124 300,000 GPD
11709 E Artesia Blvd
Artesia, CA 90701

Stuck CCTV Rig in the Florence Avenue Trunk in Santa Fe Springs

On Wednesday, 9-17-14 at 0730 hours, Sewer Maintenance Superintendent Doug Walton called John Boyd and reported that a Sanitation Districts' closed circuit television (CCTV) camera rig was stuck in the 15" Florence Avenue trunk sewer downstream of Sea One Seafoods in Santa Fe Springs (see figure 7 below). Walton requested the I.W. section staff contact industrial wastewater high flow dischargers upstream and require them to either cease their flow or hold flow to a minimum level for the next 2-3 hours to prevent sewer surcharging and possible overflows while crews attempted to retrieve the stuck camera. It was noted that MH 18 0445A, located just upstream of where the CCTV rig was stuck is the location where Ridgeline Energy Services, LLC connects to the sewer. This discharge can be quite significant (permitted peak flow limit is 1000 gpm). However, Ridgeline is a batch discharger and they had no discharge on 9-17-14. Area I.W. Inspector Jason Finn and Inspector Traci Stahl were apprised of the situation and Walton's request. Finn coordinated the response to Walton's request.

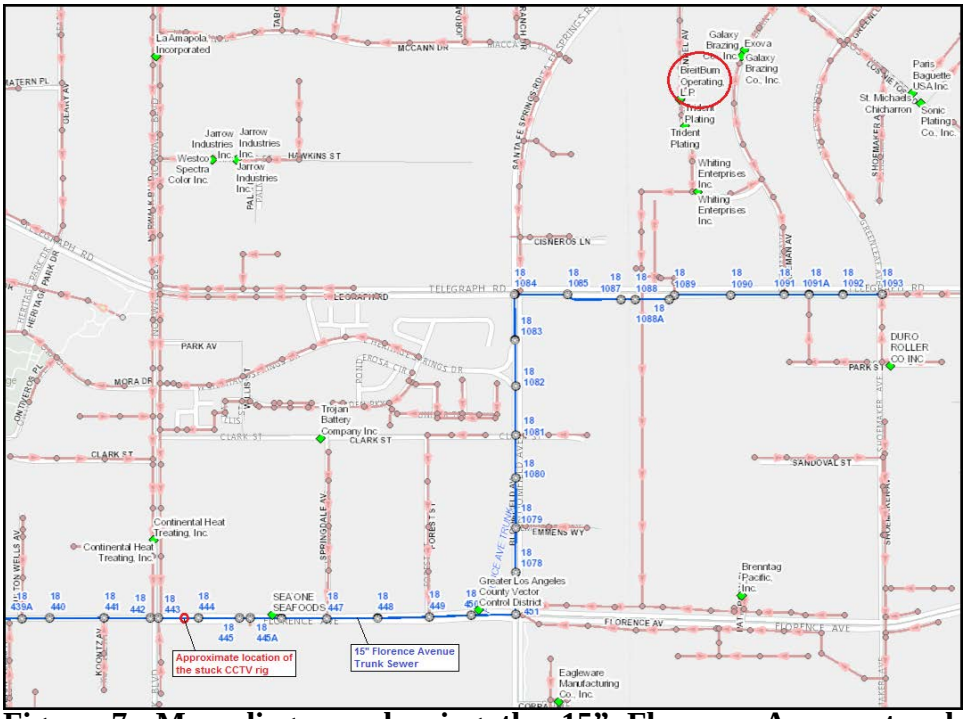

Figure 7: Map diagram showing the 15" Florence Avenue trunk sewer, location of the stuck CCTV rig and the location of Breitburn Operating LP, which ceased flow for 2.5 hours on 9-17-14 to help assist in the recovery of the CCTV rig.

At 0800 hours Inspector Jason Finn contacted Breitburn Operating LP, a large oil field production operation with significant brine discharge to the sewer that was the largest ongoing industrial wastewater source upstream when the CCTV rig got stuck. Finn requested Breitburn cease their discharge to prevent any chance of surcharging the line while the CCTV rig was being retrieved. The company contact, Mr. Jon Beatty, agreed to voluntarily cease their

discharge and did so immediately. The camera was retrieved by 1000 hours without further incident and Breitburn resumed their normal discharge to the sewer at 1030 hours.

Breitburn Operating, L.P. IW 20072 532,000 GPD
10051 Romandel Avenue
Santa Fe Springs, CA 90670

Ridgeline Energy Services LLC IW 21170 200,000 GPD
12345 Lakeland Road
Santa Fe Springs, CA 90670

Paramount Petroleum Oil Refinery Fire in Paramount

On Thursday 9/25/2014 at 1845 hours, Night Team I.W. Inspector Andy Woods heard a news report of an oil refinery fire in the City of Paramount. Without any specific information, Woods drove to Paramount Petroleum to investigate. Arriving at the site at 1900 hours, Woods saw several fire and police vehicles that clearly indicated an emergency event. There was no smoke observed at or near the refinery. Woods discussed the situation with Senior Inspector McIntosh, who immediately began checking sewer manholes downstream of the refinery for possible elevated levels of combustible gases (LEL) or other unusual conditions.

Paramount Petroleum IW 17236 280,000 GPD
14700 Downey Avenue
Paramount, CA 90723

After arriving onsite at the refinery, Woods spoke with Paramount Petroleum's head operator and refinery fire chief, Mr. Sergio Diaz. Diaz stated there had been a fire and its cause was a tube rupture in an asphalt heater. Such heaters are used to adjust the asphalt that has been blended with additives onsite prior to shipping to their customers. The fire was isolated to this heater. The refinery makes asphalt, diesel fuel, bunker fuel oil and various refinery blend stocks. A mixture of foam and water (about 200 barrels) used to extinguish the fire had collected in a bermed area around the heater, along with approximately 40 barrels of asphalt that had hardened. The fire water was pumped into an impoundment tank for testing to determine its suitability for treatment and possible discharge to the sewer system if testing indicated it could meet all applicable limits either with or without further treatment. The solid asphalt was to be hauled away for disposal. In total, about 8,400 gallons of fire water was impounded. The fire lasted for about one hour and 15 minutes (1715 to 1830 hours). The refinery was not in operation, but the facility continued to receive asphalt products. The company was found to be discharging "normal" wastewater during the inspection which met all applicable limits. Woods informed company managers that none of the impounded fire water could be discharged to the sewer without prior approval from the LACSD in accordance with their permit.

McIntosh checked the emergency monitoring downstream MH 03F0039 for headspace combustible gases, finding the LEL concentration at a normal 2%. The manhole headspace had a typical sanitary sewage odor with the wastewater in the manhole having a pH of 6.5 and normal appearance as well. As required in their 7-30-2013 industrial wastewater discharge permit, Kathryn Gleeson, Manager, Environmental Services at Paramount Petroleum had the impounded fire water tested for pH, oil and grease, and flash point, along with their impounded wastewater in tank T-25008 (due to some fire water entering this tank). Gleeson emailed the test results for the fire water, which indicated compliance with all limits, to the Sanitation Districts at 1749 hours on 9-26-14. Gleeson stated that all impounded waters would receive additional treatment by going through the company's wastewater pretreatment system, which includes a Wemco dissolved air floatation system (DAF) and an API separator, before being discharged to the sewer at their legal sampling point.

At 1807 hours on 9-26-2014, McIntosh, in concurrence with Supervising I.W. Inspector Barbara Jenkins, granted approval for the company to discharge their impounded fire water and wastewater from tank T-25008 to the sewer. No problems were reported at the

downstream WRP (JWPCP) due to the subsequent discharge. On Monday 9-29-2014, Inspector Patel issued a verbal warning to the company for failing to notify the Sanitation Districts of the fire.

Anonymous Tip Alleging Dumping at Thrifty Ice Cream in El Monte

On Friday, 9-26-14 at 0016 hours, an anonymous telephone message was left on the Sanitation Districts' fraud hotline (562-908-4290) where the person leaving the message claimed to be an employee of the Thrifty Ice Cream manufacturing facility in El Monte. The tipster reported that the company had just illicitly dumped over 7000 gallons of liquid ice cream mix into the sewer. The tipster said company managers had told employees to "not to say anything" about the discharge. The tipster said he/she was reporting the dumping because the employees didn't feel what had been done was "right". The message was received by the Sanitation Districts' Accounting Section Internal Auditor Heidi Tong on the morning of Monday, 9-29-14, who forwarded it to I.W. Section Head Dave Snyder, who in turn forwarded it to John Boyd for follow-up. Supervising I.W. Inspector Dave Lee was informed of the report and coordinated the follow-up investigation. Note that there was a delay in responding to this incident as it was reported through the Sanitation Districts' fraud hotline as opposed to the Sanitation Districts' emergency number.

Thrifty Ice Cream IW 14576 24,500 GPD
9200 Telstar Avenue
El Monte, CA 91731

Lee and area I.W. Inspector Steve Wittmer conducted the follow-up investigation. The initial investigation inspection at Thrifty on 9-29-14 found no direct evidence of the discharge but treatment plant data from the downstream treatment plant, Whittier Narrows WRP, indicated a period of elevated oxygen demand during the evening of 9-25-14 that corresponded with the tipster's information. The WRP was able to compensate for the incoming high COD material, triggering no alarms and causing no detrimental effects to the plant effluent. In response to the WRP findings, a second inspection was conducted at Thrifty on 10-2-14 where the tipster's claims were revealed to Thrifty managers. At that time, after initially stating during the initial inspection on 9-29-14 that operations on 9-25-14 had been completely normal, Thrifty's Environmental Manager Silvia Geiger admitted that there had been a situation on 9-25-14 where a valve on a holding tank had been tampered with, leading to its failure when an employee attempted to fix it. Geiger said that when the valve failed it caused 7000 gallons ice cream mix to be released to the floor and sewer. Workers attempted to contain the spill onsite, estimating that they prevented all but 500 gallons from reaching the sanitary sewer system. In consideration of the fact that there were no adverse effects on the downstream collection system and the impact on the WRP was relatively minimal, only a verbal warning violation was issued to Thrifty for failing to notify the Sanitation Districts of the spill. Company management agreed to immediately report any issues that may impact the sewer in the future and inspectors will perform periodic follow-up site inspections to monitor for non-compliance.

INDUSTRIAL WASTE SECTION
SUMMARY OF ACTIVITIES
FOR THE MONTH OF OCTOBER 2014

TREATMENT PLANT/SEWER/OTHER INCIDENT INVESTIGATIONS

Report of Clarifier Back-Up in Carson

On Wednesday, 10-1-2014 at 0800 hours, Owner Robert Demesko of the Ohio Body Shop in Carson called area I.W. Inspector Tingting Wei and reported sanitary wastewater was backing-up into the industrial wastewater clarifier at his facility. A follow-up investigation conducted on 10-2-14 and 10-3-14 by Wei and Senior I.W. Inspector Bill Barnum determined the facility's lateral direct connection to the downstream trunk sewer was partially blocked. The facility's lateral connects directly to the Districts' Keystone Trunk sewer just upstream of manhole 08 0304. Record review indicates this direct connection was permitted by the Districts. Dye testing of the lateral line, observation of free-flowing conditions in the Districts' trunk, review of 9-22-14 Districts' CCTV video of the trunk sewer at this location, as well as the presence of sanitary wastewater in the sample box connected to the clarifier, all indicated the presence of a partial blockage in the lateral. It was noted that although the partial blockage caused sanitary wastewater from the facility's restroom to back up into the sample box and caused minor surcharging in the clarifier, no actual overflow occurred. Mr. Demesko was advised to hire a plumbing contractor as soon as possible to clear the blockage. The Ohio Body Shop is a small, 3-person, auto body shop that generates industrial wastewater from washing vehicles and the paint bay floor prior to vehicle painting operations.

Ohio Body Shop IW 6144 50 GPD
21226 Main Street
Carson, CA 90745

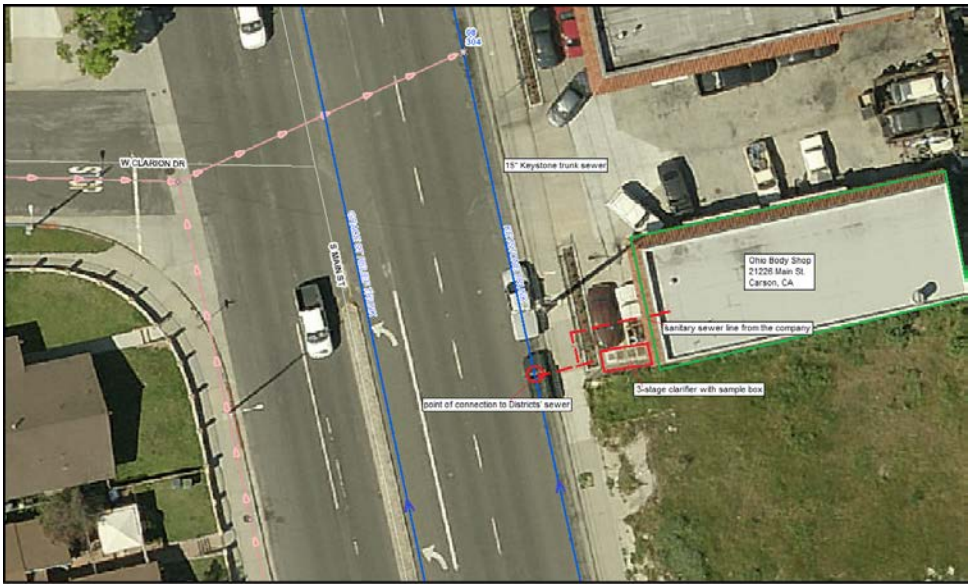

Figure 1: Diagram of the Ohio Body Shop direct connection to the Districts' 15" Keystone trunk sewer in Carson.

Compton Disposal Trunk Elevated pH

On Friday, 10-3-14 at 0859 hours, John Boyd received an email from Districts' Wastewater Collection System Civil Engineer Julio Fernandez reporting a Districts' crew had noted an elevated pH in the Compton Disposal Trunk the day before. Specifically, pH=10.5 was noted at MH 01 0742 and pH=11 was noted at MH 01 0741A at about 1430 hours. Fernandez later stated the crew had noted the wastewater also had a "caustic" odor.

Investigation by area I.W. Inspector Chris Mendoza and I.W. Inspector Tingting Wei determined the probable source of the high pH was the Sierra Cheese Manufacturing Company Inc., a medium-sized maker of mozzarella and ricotta cheese located about 0.6 miles upstream of the elevated pH finding. This facility frequently discharges wastewater having an elevated pH with the caustic type odor caused by manually neutralizing acidic wastewater they generate from clean-up operations and production processes. Inspections conducted in October 2014 found the facility discharging wastewater with a pH of 9-10 but historic inspections indicate discharges with a pH as high as 12.3. The Districts currently imposes no upper pH limit on Sierra Cheese, but recommends the discharge pH doesn't exceed 12.5. The high pH discharges are essentially being caused by over-neutralization of the wastewater by the manual addition of caustic solution to the discharge. The company is currently working to install an automatic pH neutralization system which will both enable more consistent compliance with the lower pH limit of 6.0 and the prevent over-neutralization of the wastewater. Note that these elevated pH discharges have not caused any known detrimental impacts to the downstream collection system or treatment plant operations at JWPCP and currently do not constitute a violation of any Districts' regulations.

Sierra Cheese Manufacturing Co., Inc. IW 2729 14,000 GPD
916 S. Santa Fe Avenue
Compton, CA 90221

Tampering and Low pH Discharge at United Dye & Wash in Los Angeles

On Tuesday, 10-7-14 at 1050 hours, IWMC Technician Manual Carvajal notified Supervising I.W. Inspector David Sanchez that upon sampler set-up he had monitored an acidic pH=2.8 discharge at United Dye and Wash in an unincorporated area of Los Angeles County known as Athens Village that is located just northwest of the city of Gardena. Carvajal estimated the discharge flow rate at 10 gpm at the time of the discharge. Carvajal stated he had notified company President Raul Quintero of the low pH finding. United Dye & Wash is a small textile dye house operation with 10 employees that is currently regulated by the Districts under temporary permit #21490.

United Dye & Wash IW 21490 15,000 GPD
325 W. 132nd Street
Los Angeles, CA 90061

Area I.W. Inspector Chris Mendoza responded to the report, arriving onsite at 1200 hours on 10-7-14. Mendoza found wastewater being discharged with a pH=9.0 in the sample box at 1210 hours, but more significantly also found the Districts' Isco sampler's tube removed from the flow being discharged and instead placed into a bucket of water that had been placed into the sample box (see figure 1 below). The company contacts provided no plausible explanation for this. The company was issued a written notice of violation for discharging low pH wastewater and tampering with Districts' sampling equipment. The Districts considers this type of tampering violation to be extremely serious and any recurrences will likely result in referral for legal prosecution.

Figure 2: photo of Districts' automatic Isco sampler in position at the sample box of United Dye & Wash on 10-7-14. Note that a bucket of water has been placed inside the sample box such that no sample of the actual water being discharged is being taken.

Los Coyotes WRP Tea Color

On Thursday, 10-9-14 at about 0930 hours, Supervising Treatment Plant Operator Stephen "Junior" Johnson notified I.W. Inspector Jason Finn that the Los Coyotes WRP final effluent had a light tea color. Finn proceeded to the WRP outfall and confirmed the presence of the light tea color. Finn also measured the clarity of the effluent using the Secchi disk that is kept there, noting the clarity was a normal 8 feet.

Figure 3: Secchi disk being lowered into the final effluent at Los Coyotes WRP. The disk can be used to check for effluent clarity and also can be used to check for color as it appears against the white sectors of the disk. Note the 1' interval knots in the rope that are used to quantify the water clarity. Clarity is determined by lowering the disk into the water column until the black and white sectors of the disk can no longer be visually differentiated.

All known significant industrial color sources tributary to LCWRP were inspected as part of the search to identify a source for the color. Both day and night I.W. Inspectors participated in the investigation. They found that the likely source of the incident was a large textile dyeing and washing operation in Santa Fe Springs, Tri-Star Dyeing and Finishing. However, inspectors did not feel the evidence found at Tri-Star was strong enough to justify issuance of a written notice of violation. However, the company was issued a verbal warning for exceeding their peak flow rate limit, and inspectors noted several other conditions that will require further follow-up by the inspection staff and company, including questionable pretreatment methods being employed to remove color and taking hourly color compliance samples from an improper location. No NPDES violation resulted from the incident and it was noted at 1230 hours on 10-09-14 that the color was no longer observable at LCWRP's outfall.

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

Figure 4: LCWRP outfall photo taken at 1230 hours on 10-9-14. No color present.

JWPCP Digester Gas Elevated Sulfides

On Tuesday, 10-28-14 at 0835 hours John Boyd received a telephone call from JWPCP Supervising Engineer Steve Krai and Superintendent of JWPCP Operations Dan Schmolesky. They reported that for about the past week high sulfide levels had been present in the digester gas. It is thought elevated sulfide concentrations in the digester gas are usually caused by sulfates in the material entering the digesters being converted into sulfides during the digestion process. The higher levels of sulfides are causing plant operators to have to significantly increase the amount of ferrous chloride solution addition into the digesters to control the sulfides. The amount of ferrous chloride solution being added has increased from 12,000 gpd to 18,000 gpd, so the cost to the Districts is fairly significant. It is suspected the source of the sulfides may be higher than normal concentrations of sulfate from an industrial source coming into the plant. Previous studies have indicated that the largest sources of sulfates into the JWPCP are the two automotive battery breaking plants in the Districts' service area, Quemetco Inc. in the City of Industry (IW#15708) and Exide Corporation in Vernon (IW#15725). Both plants neutralize and discharge to the sewer large amounts of waste battery acid, primarily sulfuric acid that is converted into sulfate during the neutralization process prior to discharge.

Inspectors conducted inspections at both Quemetco and Exide. Quemetco was determined to be operating normally for the past several months with no indications of any unusual events occurring that could cause or contribute to the sulfide issue at the JWPCP. Exide is currently out of operation and has been so since April 2013 per order of the State Department of Toxic Substances Control (DTSC). DTSC shut down the facility due to excessive amounts of lead and arsenic emissions from the plant into both the groundwater and soil underlying the facility and into the air. It should be noted there is no evidence of any excessive discharges of lead and arsenic into the sewer system having occurred at Exide over the past three years. A third permitted facility that discharges neutralized sulfuric acid to the sewer was also investigated: Solvay USA in Carson (IW#14723) is a manufacturer of sulfuric acid and the third largest source of sulfate into the Districts' system. The inspection there found no evidence of any unusual operations or events having occurred recently that would indicate the facility as the

source of this incident. Inspectors took samples for sulfate lab analysis at each of the above 3 facilities, plus at least 2 others. These test results are pending, but unusual results are not anticipated. Inspectors continue to be vigilant to any evidence of unknown sulfate sources that may be the source of this incident.

Anonymous Tip of Sewer Ammonia Odor at Thrifty Ice Cream in El Monte

On Friday, 10-31-14 at 0630 hours, a telephone message was left on the Districts' fraud hotline (562-908-4290) where an anonymous person claiming to have been walking by the Thrifty Ice Cream manufacturing plant in El Monte (IW#14576) that morning reported he/she had smelled a strong ammonia odor emanating from the sewer in front of the plant. The caller said he/she had noticed the odor on previous occasions when walking in the area, but it was stronger than usual this time. The caller also reported another woman walking nearby had smelled the ammonia odor and was holding her nose. The caller finished by stating his/her throat was now burning and asking the question "Why would ammonia be in the sewer or coming from the street outside of Thrifty Ice Cream?" The tipster did not say whether or not he/she was reporting the odor to any other public agencies. The message forwarded to John Boyd at 1353 hours on 10-31-14 for follow-up and investigation. Boyd contacted Senior I.W. Inspector Steve Sealy, who responded to the facility immediately to investigate.

Thrifty Ice Cream IW 14576 24,500 GPD
9200 Telstar Avenue
El Monte, CA 91731

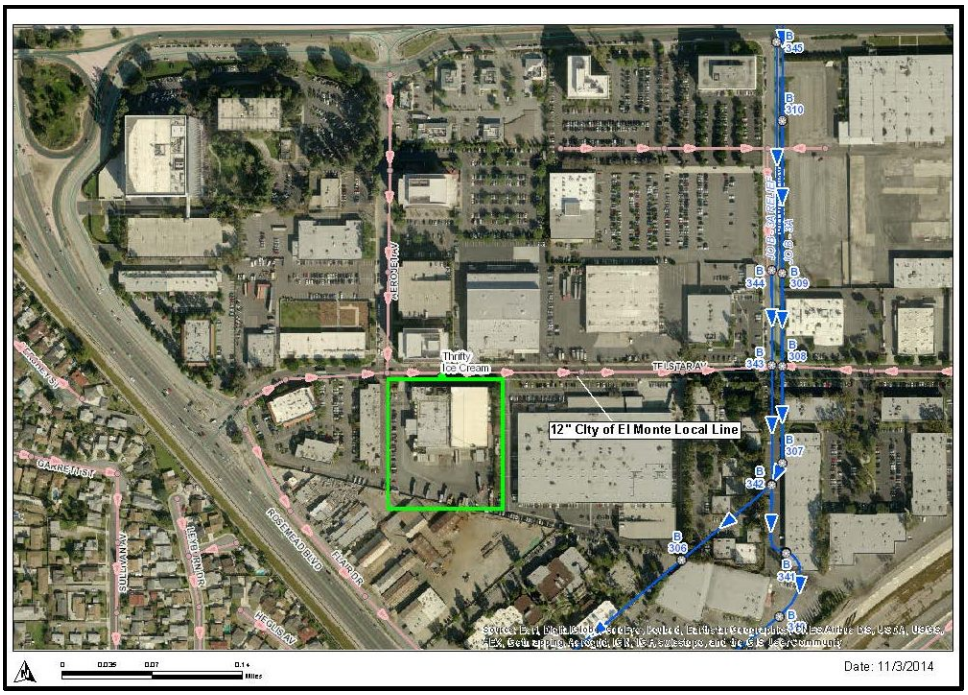

Figure 5: Diagram showing the Thrifty Ice Cream manufacturing facility in relationship to local sewers (pink lines) and Districts' trunk sewers (blue lines).

The Thrifty Ice Cream plant operates a large ammonia-based refrigeration system at their facility in El Monte. Sealy arrived at the Thrifty facility at 1438 hours and found no ammonia or other unusual odors either at the ice cream plant or in sewer lines in the area of the plant. Sealy met with the company's production manager, and both the manager's statements and Sealy's inspection findings indicated nothing had occurred that day which could have caused the reported ammonia condition. There was no evidence that the ammonia refrigeration system had

leaked or that any ammonia laden wastewater had been discharged into the sewer. I.W. Inspectors plan to conduct further investigation to search for other ammonia sources within the industrial park area where the Thrifty facility is located, but currently there are no known other ammonia odor sources. The manager at Thrifty stated that the company strongly suspects there is an unknown disgruntled employee at their facility that is making false reports to various public agencies, including 911, OSHA, and the Sanitation Districts. Rite Aid Corporation, the parent corporation of Thrifty Ice Cream, is currently trying to determine the identity of the disgruntled employee.

INDUSTRIAL WASTE SECTION
SUMMARY OF ACTIVITIES
FOR THE MONTH OF NOVEMBER 2014

TREATMENT PLANT/SEWER/OTHER INCIDENT INVESTIGATIONS

High Flows at Pomona Pumping Plant No. 4

On Monday, 11-3-14 at 1525 hours, Senior Pumping Plant Operator Randy Bones at the Long Beach Main Pumping Plant called John Boyd. Bones said he was calling on the instructions of his Supervisor, Jeff Masters, to report that since about October 15th they have been seeing unusually high flows coming into the Pomona No. 4 Pumping Plant during graveyard shift hours. He said that typically the flow into the plant is only enough to cause the pumps to cycle about twice per graveyard shift. However, currently the flows are consistently in the 40-60 gpm range, causing the pumps to cycle every 20 minutes. Bones said they suspect there may be a new wastewater source upstream that could require an I.W. discharge permit. Bones reported the influent quality during the graveyard shift appears to be normal with no unusual odors or appearance.

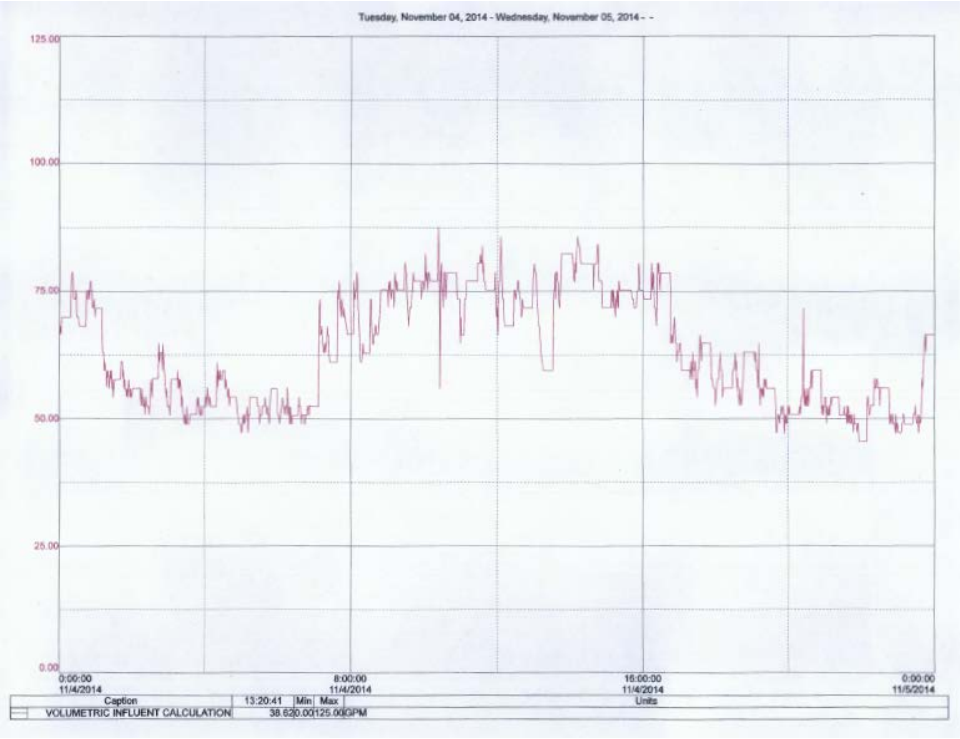

Figure 1: Pomona PP#4 flow chart for Tuesday, 11-4-14.Note that the flow is ranging from 50-75 gpm during the 24-hour period.

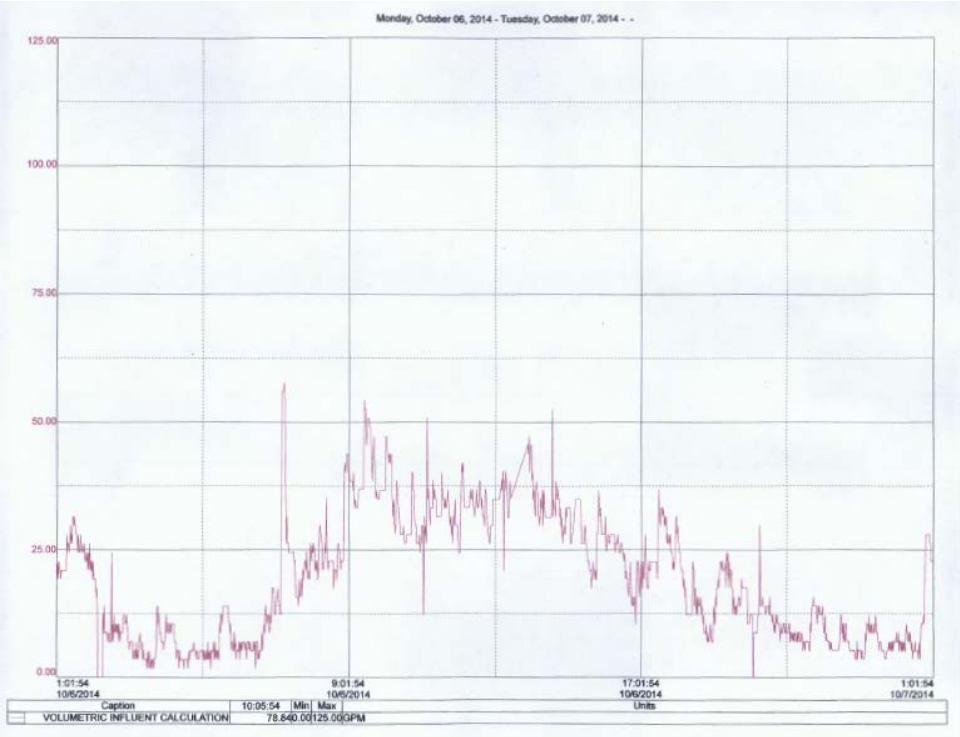

Figure2: Pomona PP No.4 flow chart for Monday, 10-6-14. Note that the flow is ranging from just above zero to 40 gpm during the 24-hour period.

Figure 3: Districts' geographic information system (GIS) photo map showing the relatively limited area influent to the Pomona Pumping Plant No. 4. Note, circled in red, the vacant commercial property at 2727 S. Towne Ave. that was identified as the flow source.

The investigation, including visual tracing of the flow to its upstream source on 11-5-14, was conducted by Senior I.W. Inspector Steve Sealy (Sealy) and I.W. Inspectors Jonathon Powell and Pat Cashen. The investigation revealed the source of high flow into Pomona Pumping Plant No. 4 was a broken toilet inside a vacant commercial building, formerly a Toys-R-Us, located at 2727 S. Towne Ave. in Pomona. Using the realtor information posted on the building, Sealy contacted the building owner on 11-5-14. A plumber was sent to turn off

the water at the meter in front of the building to stop the flow. On 11-7-14, Powell went with a plumber into the building and observed the broken toilet which had caused the continuous flow to a drain in a restroom. Flow charts from Sanitation Districts operations indicated that flows at the Pumping Plant subsequently returned to normal. The total volume of clean city water lost to sewer was estimated at approximately 1.1 million gallons (20 days from 10-15 to 11-5). No violation notices were issued due to the incident.

Low pH at JBS Swift & Company in Santa Fe Springs

On Tuesday, 11-4-14 at 0950 hours, Sanitation Districts' I.W. Monitoring Crew Technician Jose Quero notified Supervising I.W. Inspector David Sanchez that he had observed a pH of 1.61 in the sample box at JBS Swift & Company in Santa Fe Springs at 0945 hours. Quero said he had also notified the Swift contact of the low pH finding. Area I.W. Inspector Jason Finn (Finn) conducted follow-up.

JBS Swift & Company IW 20751 8875 GPD
13215 Cambridge St.
Santa Fe Springs, CA 90670

Swift processes raw meat, primarily beef. Industrial wastewater is primarily generated from meat washing and plant cleaning operations. A spray box where concentrated citric acid solution is sprayed on raw meat to sanitize and tenderize it was found to be the source of the low pH finding in the sample box. Swift typically neutralizes the acidic wastewater from this operation using a small automatic pump system that feeds caustic solution from a 55-gallon drum into an adjacent drain. Investigation found a pump tube had temporarily plugged, causing the neutralization system to fail. Finn issued the company a written NOV on 11-6-14 for the 11-4-14 violation and encouraged the Swift to propose installation of a more reliable neutralization system. As a result of this violation, the Sanitation Districts are also likely to Swift) to install a pH probe at the sample box, along with a chart recorder so that compliance with Sanitation Districts' pH limits can be more closely monitored.

Los Angeles County Department of Public Works 1-Time Discharge Permit

On Tuesday, 11-4-14 at 0840 hours, Project Manager George Win with the Los Angeles County Department of Public Works Water Resources Division's Sea Barriers Unit sent an e-mail to John Boyd asking for permission for a one-time discharge of barrier well development water to the dry weather diversion flow industrial wastewater permitted connection at 2621 The Strand Avenue in Manhattan Beach. The proposed discharge would occur for 2-3 days during the week of November 10-14, 2014, and would consist of approximately 15,000-20,000 gallons of water discharged between the hours of 8:00 a.m. and 4:00 p.m.

LACDPW Flood Maintenance Division IW 17004 80,000 GPD
2621 The Strand Avenue
Manhattan Beach, CA 90266

The proposed discharge was approved on 11-4-14 by Boyd after consultation with I.W. Permit Engineer Jaime Badia. Badia is the Sanitation Districts' lead engineer on dry weather diversion system permits. A number of requirements were included in Boyd's e-mail response approval including:

1. Notification of the area I.W. Inspector.
2. Limitation of the flow rate to 50 gpm.
3. Requirement that the flow be ceased immediately if there was any evidence of flow backing-up or surcharging in the receiving sewer.

The previously approved permit for the dry weather diversion system referenced above limited the peak flow to 130 gpm, but this rate is only allowed during off-peak hours (2200-0600 hours). Given that the proposed discharge was to occur during peak discharge hours of 0800-1600, it was decided to set a more conservative peak flow limit (50 gpm) during those hours.

Although there were some minor project delays, on 11-25-14 Win sent Boyd an e-mail indicating the project and its associated discharge of well development groundwater to the sewer had been successfully completed. This followed several approved extension requests due to the project delays. There were no known adverse impacts on the sewer system from the project and a site inspection on 11-18-14 by Senior I.W. Inspector Bill Barnum found all Districts' requirements were being met.

Ammonia Release at Praxair, Inc., in Carson

On Tuesday, 11-11-14 at 1400 hours, Supervising I.W. Inspector Barbara Jenkins received a call from LBMPP Operator Carlos Molina notifying her that he received a call from Chuck McDonald of Praxair, Inc., in Carson. Note that 11-11-14 was Veteran's Day Holiday. McDonald reported there had been an ammonia vapor release at his facility earlier in the day and that their ammonia vapor containment system had activated causing an unknown volume of ammonia laden water to be released to the sewer. McDonald stated that Doug Shearer, Carson Facility Manager was on-site. I.W. Inspector Sanjay Patel was contacted and subsequently spoke to Shearer by phone and responded to the site to collect additional information.

Praxair Inc. IW 14410 13,711 GPD
2006 E 223rd St.
Carson, CA 90810

Praxair manufactures industrial gases at their Carson Facility. A large ammonia-based refrigeration system is used as part of the gas manufacturing process. Patel's 11-11-14 inspection and subsequent follow-up by area I.W. Inspector Tingting Wei on 11-12-14 indicated an ammonia compressor valve malfunctioned at 0645 hours on 11-11-14, causing a large release of ammonia vapor. Praxair personnel immediately evacuated the facility and notified the Fire Department, who responded to the scene by 0655 hours. The problem valve was isolated by Praxair and Fire Department Hazardous Materials technicians by 1100 hours. By 1300 hours, it was determined the building was safe to enter. The malfunctioning valve was repaired and at 1400 hours, Praxair technicians decided to restart the system. However, they quickly thereafter found ammonia laden water related to the release was being discharged from sumps into the sewer, prompting them to notify the Sanitation Districts. After the notification, and upon receiving an order from I.W. Inspector Patel to cease the discharge immediately, the discharge to the sewer was stopped. Sanitation Districts' investigators were ultimately unable to determine the amount of ammonia that was discharged to the sewer as Praxair officials could only estimate that the total amount of ammonia lost was about 8020 pounds, with this figure including ammonia lost both to the atmosphere and into the water that was first discharged without permission and later slowly bled into the Sanitation Districts' system after they obtained permission to do so. The incident had no known impact on Sanitation Districts' operations though JWPCP Supervisor of Treatment Plant Operations Gus Caro was notified at 1500 hours on 11-11-14 by Supervising I.W. Inspector Dave Lee of the potential for such. On 11-13-14 Wei issued a NOV to Praxair for the unauthorized discharge of ammonia laden water into the sewer. Praxair's Facility Manager, Doug Shearer, accepted the NOV, stating that the Company is currently working on instituting new equipment and procedures to insure another unauthorized release of ammonia to the environment does not occur.

Owens-Brockway Water Leak in Vernon

On Wednesday 11-12-2014 at 1525 hours Environmental Manager Anita Luitel of Owens-Brockway Glass Container, Inc. in Vernon called John Boyd and reported that at 1300 hours a leak had developed in a 4-inch city water line at their facility. A plumber was called to fix the problem. Luitel claimed that none of this city water had entered the sewer. Senior I.W. Inspector Kent McIntosh responded.

Owens-Brockway Glass Container, Inc. IW 1029 104,500 GPD
2901 Fruitland Avenue
Vernon, CA 90058

Inspections at the Owens glass bottle manufacturing facility by McIntosh and area I.W. Inspector Ken Hanks found that an unknown volume of potable water was released from a broken city water main onto Owens property. A portion of the water overflowed into a nearby storm drain and the water that remained on the Owens property was pumped to the facility's process/cooling water recirculation system for reuse. The broken water main line leak was quickly repaired by city water system crews. There was no impact on the Owens' wastewater treatment or discharge systems and there was no impact on the downstream sewers or Sanitation Districts' operations.

Long Beach Water Reclamation Plant Elevated pH

On Wednesday, 11-19-14 at 1935 hours, Los Coyotes Treatment Plant Operator, Mike Hunter telephoned Supervising I.W. Inspector Barbara Jenkins and reported that data from the Sanitation Districts' Long Beach Water Reclamation Plant indicated there had been a high pH of 11.4 around 1850 hours. Note that because LBWRP is manned only during the day shift, any situations that arise after that time are monitored and responded to by operators at the LCWRP. Investigation by night team Senior I.W. Inspector Kent McIntosh and day shift Senior I.W. Inspector Andy Woods subsequently determined that the high pH incident occurred as the result of an unusual caustic shock dosing event that was done on a portion of JOA-1A Gridley Road Interceptor Trunk Sewer, which is tributary to LBWRP. Sanitation Districts' Compton Field Office Senior Engineer Darrell Hatch confirmed 600 gallons of 24 percent sodium hydroxide solution was dispensed between 1330 hours and 1400 hours on 11-19-2014 as part of ongoing attempts to mitigate high sulfide headspace gas conditions in the line that are likely occurring as a result of a combination of low flow conditions in the line and the presence of high strength wastewater discharge from the California Dairies Facility in Artesia (IW#5124). Please see September 2014 Industrial Waste Section Summary of Activities Report item "Gridley Road Interceptor Trunk High Sulfides in Artesia" for further information. The I.W. Section and Compton staff are well aware of the problems in the line and are cooperatively working towards investigating and resolving the situation. However, in this case word of the special caustic shock dosing event apparently was not forwarded to the LBWRP operators. Should another special dosing event be scheduled, care will need to be taken to properly inform them. LBWRP operations were not adversely affected by the incident.

Chem Pro Labs Anonymous Tip

On Friday, 11-21-14 at 1611 hours, John Boyd was sent an email by Los Angeles County Fire Department Supervising Health and Hazardous Materials Specialist Fernando Florez. The email detailed an anonymous telephone call tip received by his agency alleging that unknown liquid hazardous waste liquids were being dumped into a sewer drain at Chem Pro Labs in Gardena every Saturday morning. The tipster called the LACFD on Friday, 11-14-14. This information was referred to area I.W. Inspector Shawn Cleaver for follow-up.

On Wednesday, 11-26-14 Cleaver and Senior I.W. Inspector Bill Barnum conducted an inspection at the currently unpermitted Chem Pro Labs facility. The facility is divided between two main buildings each with distinct operations:

1. The south building is used for industrial waste contract sampling and analytical services. It houses offices and a lab area with two sinks. There is also another sink outside the north of the building used for disposal of samples. This area also has two industrial wastewater connections to the sewer with respective sample boxes on the east and west sides of the building.

2. The north building houses a chemical blending operation where concentrated acids, oxidizers and other chemicals are combined to produce drummed solutions used in water treatment applications such as corrosion protection for cooling towers and boilers. This part of the facility has no plumbed drains. Mixing containers have secondary containment and a blind sump. Rainwater is collected and pumped into totes for disposal offsite.

Figure 4: Chem Pro Labs facility photo/diagram.

A field test of water in the west sample box of the south building indicated an acidic pH of 0.3. At the time of the sample was taken, there was no ongoing flow in the sample box, but the box itself was highly etched, indicating acidic discharges at this location are likely common. The wastewater in the east sample box had a pH of 6.0 and was also had no ongoing flow. Although the low pH was found in the west sample box, there was no definitive evidence found indicating it was anything more than that from the disposal of relatively small volumes of acidic lab test wastewater. While it's true this waste should have been neutralized prior to discharge, its presence alone does not necessarily corroborate the tipster's claims that the company is discharging potentially much larger and more illicit amounts of hazardous wastes from the compounding/mixing operations. The company contact denied that any waste from the blending operations were sewered, claiming they are hauled offsite for legal disposal. However, the contact was unable to produce any hazardous waste manifests for hauled wastes from the blending operations dated after July 2012. After reviewing these findings, Boyd and Cleaver agreed to continue the investigation by scheduling one or more Saturday surveillance sampling

events in early 2015 to see if more concrete evidence of the alleged illicit discharges can be obtained.

Pomona WRP Elevated Color in Final Effluent

On Friday, 11-21-14 at 1311 hours Districts' Monitoring Section Civil Engineer Monica Gasca sent an email to I.W. Section Head Dave Snyder and John Boyd informing them that the annual average for color in the Pomona WRP effluent samples was likely going to exceed the drinking water secondary maximum contaminant level (MCL) limit of 15 color units for 2014 that the Districts tries to meet. Gasca stated that in November 2014 the result was 23 color units (CU) with the annual average over the MCL of 15 CU in October and November. Because the values have been at or above 15 CU since March 2014, Monitoring Section staff are anticipating continuing exceedances of the 15 CU limit.

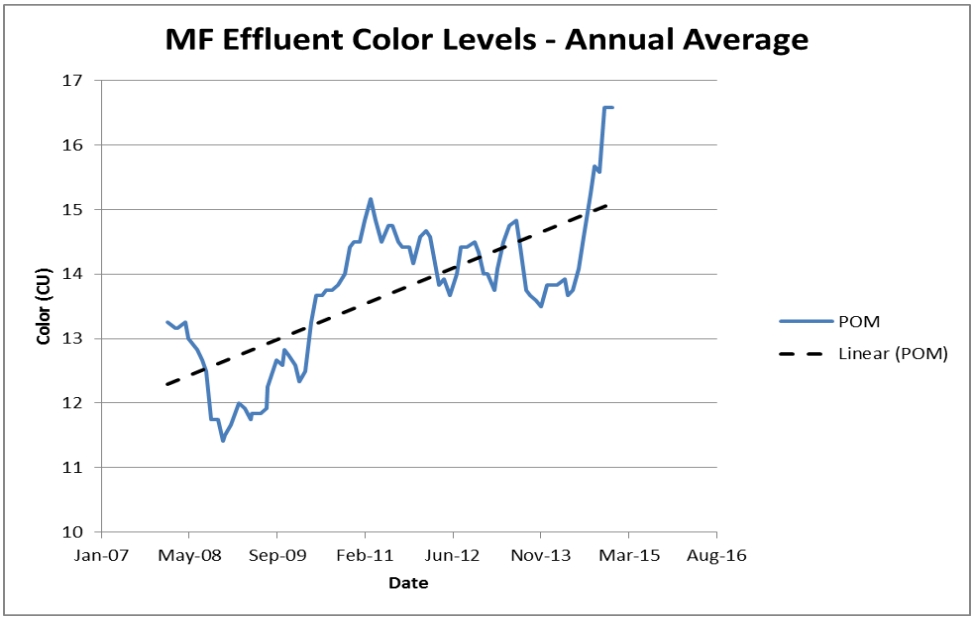

Figure 5: Montebello Forebay (MF) effluent color data showing the Pomona WRP color levels from 2008 to 2014. Note the increasing trend.

Investigation of this report, and a similar one in May 2013 by the I.W. Inspection staff remains ongoing, but has yet to identify any unusual or new industrial sources of color upstream of the Pomona WRP. The color test in question is non-specific as to wavelength, resulting in matching of known industrial source wastewater with low to moderate amounts of color to the colored treatment plant effluent samples difficult or impossible. Inspectors remain vigilant as they continue to be on the lookout for any industrial sources that could account for the color in the treatment plant effluent.

Valencia WRP Citrus Odor

On Wednesday, 11-26-14 at 1245 hours, Valencia WRP TPO II Alfonso Vasquez called John Boyd and reported that during regular rounds at 1230 hours that day operators had noted a "lemony" or citrus odor in the plant at the secondary aeration tanks. All other operational parameters at the WRP were normal (influent pH=7.61 at 1245 hours, normal dissolved oxygen levels in the aeration tanks) and the plant was operating normally.

Investigation by night team Supervising I.W. Inspector Barbara Jenkins and area I.W. Inspector Peter Carlstrom identified Flavor Producers, Inc. as the source of the citrus odor. The company was found to be working late on 11-26-15 to complete two rush orders. According to their production records Flavor Producers had made a 74-gallon batch of orange flavoring

around 0930 hours on 11-26-14. 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. 23850 Witherspoon Parkway Valencia, CA 91355	IW 17052	2200 GPD

INDUSTRIAL WASTE SECTION
SUMMARY OF ACTIVITIES
FOR THE MONTH OF DECEMBER 2014

TREATMENT PLANT/SEWER/OTHER INCIDENT INVESTIGATIONS

Tip of Illicit Waste Dumping at Compton Auto Repair Shop

On Wednesday, 12-3-14 at 1504 hours, an email was received in the Districts' fraud email address inbox. The email stated as follows: "In the business Manny's general auto repair located at 15323 S. Atlantic Ave Compton CA 90221 has been purposely allowing their antifreeze from the cars on their property to spill in to the Alley and has already caused the casualty of a neighborhood pet. It's been determined that the spill is purposely because on several occasion the owner has been asked by surrounding inhabitants but nothing has been done. The spill has been there for several weeks." The sender's name and email address were indicated on the email. The email included 3 attached photos purporting to show the spilled antifreeze (see below). The photos all appeared to show what appeared to be a very minimal amount (<1.0 L) of green colored liquid that had seeped outside through a building wall crack.

Figure 1: Tipster photo email attachment claiming to be of antifreeze solution being discharged into an alley at Manny's General Auto Repair in Compton on 11-17-14.

Area I.W. Inspector Chris Mendoza investigated the tip on 12-4-14 and 12-9-14. He found no evidence that the owner of the repair shop was accidently or purposely dumping waste antifreeze into either the storm drain or sewer system. Review of waste manifests indicated waste antifreeze, oil, and aqueous parts cleaning solvent solution were all being properly disposed. It was noted on 12-9-14 that there was a little water flow going offsite into the adjacent alley and storm drain. The flow was traced to a leaking hose bib. The owner said he would fix the leak that day. During the investigation it was noted that the building and several vehicles had what appeared to be moderate fire damage (see figure 2 below). The owner stated his shop had been

fire-bombed by someone on June 10th and that police were currently investigating. I.W. Inspectors have not been able to verify this claim.

Figure 2: Photo taken on 12-4-14 showing interior of Manny's General Auto Repair shop. Note apparent fire damage.

Whittier Narrows WRP Red Color

On Thursday, 12-4-14 at 1220 hours, Supervising Treatment Plant Operator Charles Arellano at Whittier Narrows WRP notified Supervising I.W. Inspector David Lee that during routine rounds operators noticed a faint red color in foam in the plant filters and also red staining at the top of the water line of a drained filter tank. Arellano said that he didn't think the color was visible at any other location in the plant processes. The treatment plant was otherwise running normally and no red color had been noted in either the raw influent or effluent.

Figure 3: 12-4-14 photo of pink colored staining on a filter tank wall at Whittier Narrows WRP.

I.W. Inspectors Steve Wittmer, Pat Cashen, and Ken Hanks investigated. Inspections were conducted at 7 industrial facilities capable of discharging colored wastewater to the WNWRP but no evidence was found that implicated any of them in causing the red color in filter foam and wall staining. It was verified that the color was never seen in the water at any point of the treatment process and was limited to the foam residue on the walls of the filters. Visually, the color appeared to be made up of small particulate (solid) matter in the foam and was more pink than red. A similar issue was reported at the Valencia WRP approximately 15 years ago and although no source was found for the color, analysis done by CSD Microbiology suggested the color was caused by bacteria growth on the water surface/foam in the filters. In that case, Serratia marcescens was offered as a possibility considering its ability to produce a red pigmented substance "prodigiosin." The bacteria is ubiquitous in the environment and has a preference of damp conditions (commonly in bathrooms-see figure 4 below, as well as numerous other photos which can be viewed on the internet if one searches for images of "pink bacterial scum in bathroom") where it manifests as a pink discoloration and slimy film feeding off phosphorus-containing materials or fatty substances such as soap and shampoo residue. It should also be noted that the local area received the first substantial rain (approximately 2 inches) in over a year in the three days just prior to the color report. This "flush" of water may have washed out a variety of pollutants not normally seen in the sewers. Operators at WNWRP reported that there appeared to be no ill effects on the treatment process at any time and no color was reported in the final effluent. I.W. Inspectors will continue to monitor WRP operations and respond if needed.

Figure 4: Internet photo of pink bacterial film in a bathroom sink.

San Jose Creek East WRP Petroleum Odor/Dark Color

On Friday, 12-5-14 at 0820 hours, San Jose Creek East WRP Supervising TPO Jesus Garibay notified Supervising I.W. Inspector John Boyd that operators had noted wastewater in the raw influent channel appeared to be a very dark color and had a petroleum odor. At the time there were no other problems reported with plant operations.

Figure 5: Photo of samples taken at SJC-East WRP on 12-5-14 to compare the unusual dark colored raw influent to normal colored sewage.

Inspections were conducted at multiple large dischargers upstream of the San Jose Creek East WRP with a special emphasis on companies with the potential to discharge oils or large quantities of rainwater (a two day period of heavy rain preceded the incident). No evidence was found at any of the inspected IU's that implicated a source. Inquiries were made to both Districts and local agency sewer maintenance departments regarding any possible sewer activity (cleaning, repair work, etc.) occurring in the upstream sewers, but no activity was reported.

Influent samples collected at the time of the event were analyzed for oil and grease but the results were inconclusive (see figure 6).

12/05/14 SJC East WRP Petroleum Odor / Dark Influent Samples

	0800 Raw Influent "Abnormal Dark Color"	0900 Raw Influent "Normal Color"
Total Oil and Grease	51.7 mg/L	71.8 mg/L
Non-Polar Oil and Grease	10.4 mg/L	5.96 mg/L

Figure 6: Sample analysis results for SJC-East WRP raw influent samples taken on 12-5-14 to compare the unusual dark colored sample to "normal" raw influent.

Historically, influent total oil and grease analysis is only done routinely at JWPCP with typical results ranging from 50-80 mg/L. The 12/5 SJCEWRP incident samples results fall within this range although it is peculiar that the non- polar oil and grease in the "dark, odorous" sample is elevated in comparison to the "normal" sample. When compared visually, the dark color in the "abnormal" sample appears to be caused by a large amount of settleable solids (see figure 7). This observation along with its odor, which seemed similar to the odor found in drained sewers, wet wells or sumps, lead inspectors to speculate that either there was an unreported sewer cleaning event occurring somewhere upstream or the rain event occurring immediately prior to the incident caused a sudden "flush" of built up sewer solids. At no point during or in the 24 hours after the event did operators report any ill effects on treatment operations and no WRP effluent violations occurred. There have been no similar reports of peculiar influent since the 12/5 incident. I.W. Inspectors will maintain contact with WRP operators and respond to any similar future reports.

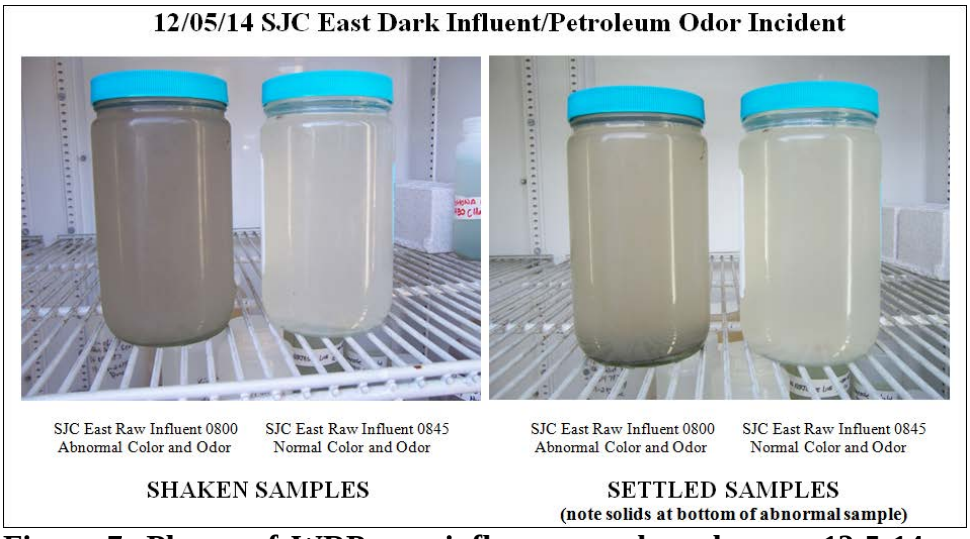

Figure 7: Photos of WRP raw influent samples taken on 12-5-14 to compare the unusual dark colored sample to normal raw influent.

Long Beach WRP Low pH

On Monday, 12-8-14 at 1540 hours, Long Beach WRP Supervising TPO Bob Dunn called I.W. Supervising Engineer Bill Cheyne and reported that at approximately 1430 hours the plant's influent pH began to drop, bottoming out at 6.45 at about 1530 hours. It then began

increasing and was currently at 6.7 at 1545 hours. Operators took a primary effluent sample which was later picked up and submitted for heavy metals analysis by I.W. Inspectors. Cheyne contacted Supervising I.W. Inspector David Sanchez and it was agreed to commence an investigation first thing the next morning.

Figure 8: Long Beach WRP influent pH trend data (blue line) for Monday, 12-8-14 between 1448 and 1648 hours. The data indicate WRP influent pH reached a low point of 6.45 at 1527 hours.

Senior I.W. Inspector Andy Woods, as well as I.W. Inspectors Steve Lajkowicz and Jason Finn investigated on 12-9-14. All 3 significant industrial sources judged capable of discharging acidic wastewaters in the volume needed to cause this incident were inspected. This included California Dairies Inc., which was found to be discharging pH compliant wastewater during the previous 24 hours and the Long Beach Water Department water treatment facility, which was found to be discharging wastewater having a pH above 7 during the previous 24 hours. The analysis of the WRP primary effluent sample analysis indicated normal concentrations of heavy metals. The WRP did not experience any operational issues as a result of the low pH. No causative industrial sources were found during the investigation. I.W. Inspectors remain vigilant to possible sources for this incident.

<u>Tip of Illicit Wastewater Discharge at Compton Auto Body Repair Shop</u>

On Thursday, 12-18-14 at 0951 hours, Supervising I.W. Inspector John Boyd received a call from Long Beach Main Pumping Plant Operator Carlos Moreno. Moreno said he'd just received a call from an anonymous tipster reporting illegal dumping of industrial wastewater at an auto body repair shop in Compton. No name was provided for the shop but the tipster stated its location as 3201 N. Alameda Street Suite S inside the "BRC Business Park" in Compton. The caller alleged that the wastewater was being generated from washing vehicles in the driveway after they had been sanded and prepped for painting. The caller also stated the washing operations are being done on Saturday nights/Sunday mornings. The wastewater is probably being sent into the storm drain. The tipster further stated that he was aware that area Districts' I.W. Inspector Chris Mendoza had recently been inspecting businesses in the business park.

Mendoza investigated the tip on Monday, 12-22-14. His investigation located an auto body repair shop inside the business park at 3201 N. Alameda St. in Suite F. The park does not have a suite 'S" indicating the tipster gave an incorrect suite identifier for the facility in question. Mendoza was unable to gain access to the shop's interior due to the business being closed that day. However, he spoke to the owner of a nearby business who confirmed the information given by the tipster, adding that the business has variable hours but is mostly open on weekends. Mendoza observed some staining on the pavement leading from the shop's garage door to the storm drain (see figures 9 and 10 below). Discharge of industrial wastewater from auto body repair operations to the sanitary sewer is legal, and in fact permit exempt, per current Districts' industrial wastewater discharge permit guidelines. However, the discharge of this wastewater to the storm drain is illegal. Given his findings and the Districts lack of legal authority concerning illicit discharges of wastewater into the storm drain collection system, Mendoza referred the case to the local storm water control agency for further follow-up.

Figures 9 and 10: 12-22-14 photos of staining on pavement outside the auto body repair shop located at 3201 N. Alameda St. Suite F in Compton.

Foul Odor Referral in Pomona

On Friday, 12-19-14 at 1020 hours, Federal Environmental Protection Agency (EPA) Criminal Investigator Annette O'Donnelly called Supervising I.W. Inspector John Boyd and reported that she had received a telephone call reporting foul odors from a resident who lives across the street from Technical Anodize LLC in Pomona (IW#21063). The resident, who lives in a trailer park, reported that over the past year the odors, which he described as "cows," had been emanating from Technical Anodize and was getting progressively worse. The resident further stated the odor seemed to be stronger when the weather was cloudy. Boyd and O'Donnelly speculated the cloudy weather association could indicate stronger odors occurring when winds are light, as commonly occurs during cloudy/foggy weather, especially during early morning hours. The resident also stated that the odor is occasionally so strong that "my head hurts and I can't breathe." Technical Anodize was the subject several years ago of a joint Districts/EPA investigation into illicit dumping of anodizing wastes into the sewer that ultimately resulted in the prosecution and conviction of the company owner, who served one year in prison for the illicit discharges. Given this history, O'Donnelly decided to contact the Districts to request they conduct an initial investigation into the odor report. She requested that

I.W. Inspectors inspect Technical Anodize to see if they can corroborate any of the resident's claims.

Area I.W. Inspector Pat Cashen investigated the referral. Inspection at Technical Anodize on Monday, 12-22-14 found no evidence the company was the source of the foul odors or could be the source of the foul odors. While anodizing manufacturing operations typically involve the use of acid and alkaline solutions, they typically do not generate foul odors of any kind and have little capacity to do so. Cashen subsequently conducted observations of the areas in and around Technical Anodize 6 times between the hours of 0935 and 1115 in late December 2014 and early January 2015 to see if he could detect any foul odors. On two occasions, 12/30 and 1/5, he did note a manure odor. The source of the odor was not identified, but was not coming from the Technical Anodize facility. It is likely the odor sources are dairy farm operations located near Pomona. No further investigation is planned. The findings were reported to Investigator O'Donnelly.

Lancaster WRP Ragging

On Sunday, 12-28-14 at1305 hours, Supervising I.W. Inspector John Boyd received a telephone call from Lancaster WRP Treatment Plant Operator (TPO) Rafael Rivas. Rivas reported that both on Friday, 12-26-14 at 1400 hours, and then again at 1245 hours on 12-28-14 the plant received what looked like "cut-up sheets" in the flex rake influent mechanical screens (see figure 11 below). The sheets are causing the flex rakes to plug and require manual maintenance from operators to clear. Rivas stated the sheets appear to come in in batches. Boyd asked Rivas to save some of the sheets so that investigating I.W. Inspectors we could take a look at them and see if they have any identifying marks. He said he would do so. A similar report of ragging was subsequently called in to Supervising I.W. Inspector Barbara Jenkins by Lancaster Supervising TPO Daniel Shubin at 0810 hours on Friday, 1-2-15. Shubin stated the ragging problems have persisted and have been occurring on a near daily basis.

Investigation and inspections by area I.W. Inspector Jonathon Powell, and former area I.W. Inspector James McCurdy, found no evidence that the obvious source suspect for this report, the Lancaster State Prison, was the source of the ragging. Close observation of the ragging indicated that it was not cloth sheeting or cloth rags. Instead the material appears to be mostly the typical plastic-based "disposable wipes" that are causing moderate to severe ragging problems in sewer systems throughout the United States, Canada, and Europe (see figure 12). I.W. Inspectors will work with Lancaster WRP operators and sewer maintenance personnel in January 2015 to see if the rags found at the WRP continue to be solely made up of the plastic-based wipes and if so, try to locate any large point sources that could be controlled.

Figure 11: Excessive ragging on the flex rake screen at Lancaster WRP on 12-29-14.

Figure 12: 12-29-14 photo of plastic-based disposable wipe removed from the flex rake screening system at Lancaster WRP. Note how similar the wipe appears to cloth when encountered at this location.

Lomita Extension Trunk Gasoline Odor

On Monday, 12-29-14 at 1000 hours, Supervisor of Sewer Maintenance Bill Foley notified the I.W. Section that at 0930 hours during a routine maintenance operation at Manhole 05 1792 on the Lomita Extension Relief Trunk at 23867 Anza Ave. in Torrance, a Districts' sewer maintenance crew had reported smelling a strong gasoline odor emanating from the manhole. The crew indicated that no odor was present and the headspace gas explosivity had measured 0% upon opening the manhole, but at some point during the work, the gasoline odor became present and lasted for approximately 3-4 minutes. The crew finished their work and left the area before reporting the odor. Foley said that at no time was there any elevated explosivity measured on any gas detectors. This is a 12" trunk sewer which receives flow from an area limited to mostly residential and some small commercial facilities.

I.W. Inspectors Shawn Cleaver, Chris Mendoza, and Tingting Wei immediately responded to the manhole location and investigated the report. They quickly determined that the source of the gasoline odor was an Arco gas station/auto repair facility located immediately upstream of MH 05 1792 that had a direct connection to the trunk sewer. The station manager admitted to discharging small amounts of gasoline into a sink that morning. He said he had rinsed gasoline residues from a small container used when changing fuel filters on vehicles. He was informed by I.W. Inspectors that no gasoline or gasoline residue should be rinsed into the sink because it could cause explosive conditions in the sewer that could put Districts' workers in danger. The contact agreed to no longer rinse any gasoline residue into the sink. The volume of gasoline discharged was estimated to be less than one liter. The manager was given a verbal warning to not dispose of any gasoline or associated residue into the sewer.

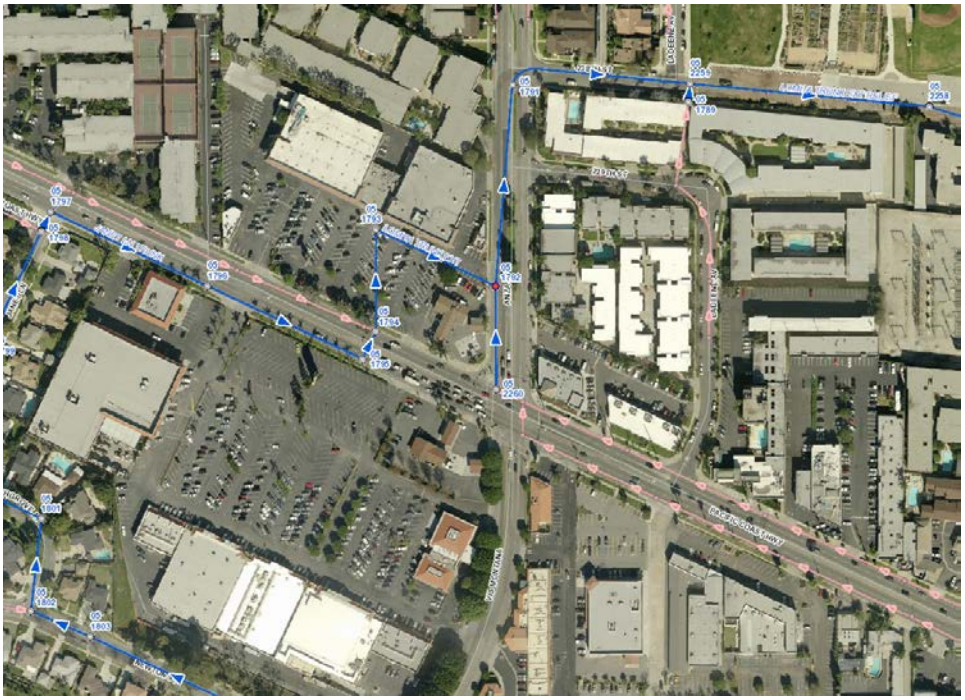

Figure 13: Photo map showing the manhole location of the gasoline odor Report (MH 05 1792) and the adjacent Arco service station that was found to be the source.