2023 ANNUAL REPORT

INDUSTRIAL WASTE PRETREATMENT PROGRAM

LOS ANGELES COUNTY SANITATION DISTRICTS

ROBERT C. FERRANTE
CHIEF ENGINEER AND GENERAL MANAGER

SUBMITTED
April 15, 2024

APPENDIX H
INDUSTRIAL WASTE REPORTS ON INCIDENTS

2023 SUMMARY OF TREATMENT PLANT INCIDENTS

Type of Incident	JWPCP/ WF	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	7	1	1	2		9		1	1				**22**
Metals/ Cyanide													**0**
Toxicity		1											**1**
pH High		1	1				2		1				**5**
pH Low													**0**
Turbidity													**0**
Grease	1												**1**
LEL	3												**3**
NDMA													**0**
Color		1		2		1							**4**
Foam													**0**
Chloride													**0**
Odor													**0**
Ammonia	1												**1**
Temperature													**0**
Total	**12**	**4**	**2**	**4**	**0**	**10**	**2**	**1**	**2**	**0**	**0**	**0**	**37**

2023 PUMP PLANT INCIDENTS INVESTIGATED	
EXCESS FLOW	3
PERSONAL WIPE RAGGING	
OTHER RAGGING	
FLAMMABILITY/LEL	
COLOR	
CORROSION	1
EXCESS MAINTENANCE	
ODOR	1
OILY SLUDGE/GREASE	
FOAM	2
TOTAL	**7**

2023 SURFACE DISCHARGE INCIDENTS INVESTIGATED	
IU - SPILL	10
RIVER SPILL/DUMP	
FUEL/SOLVENT	1
CHEMICAL/PAINT SPILL	4
SEPTIC WASTE DUMP	
GROUNDWATER CONTAMINATION	
NUISANCE DISCHARGE	
Total	**15**

2023 SEWER INCIDENTS INVESTIGATED	
Elevated H2S reported by Sewer crew	
ODOR- Sulfide	
ODOR-Other	
FIRE INVESTIGATION: Non-refinery	
FOAM	
OIL/FUEL/SOLVENT	
RAGGING	
EXCESS SOLIDS	1
SCALE	
Elevated LEL reported by sewer crew	
LOW pH	
CORROSION	
RAINWATER	
COLOR	
BLOCKAGE/SSO Due to Grease	4
BLOCKAGE/SSO Not due to Grease	
ILLEGAL ACCESS TO MANHOLE	
EXCESS FLOW	1
ILLEGAL DUMP	1
Total	**7**

2023 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	7		11	27		20	2			2	**69**
IU SMR Call	4	2	29								**35**
Public Agency			2					2		2	**6**
IWMC or CSD	19		2	1		1	1		5	3	**32**
Citizen					3					1	**4**
Anonymous											**0**
News Report											**0**
Total	**30**	**2**	**44**	**28**	**3**	**21**	**3**	**2**	**5**	**8**	**146**

2023 LIQUID WASTE DISPOSAL STATION REFERRALS									
	EXCESS SOLIDS	EXCESS GREASE	IRREGULAR RECORDS	LOW/HIGH pH	EXCESS TDS	SUSPICIOUS ACTIVITY	INAPPROPRIATE SOURCE	MISC.	**TOTAL**
LWDS Attendant calls for assistance or investigation	1			23	7			1	**32**

INDUSTRIAL WASTE SECTION
SUMMARY OF ACTIVITIES
FOR THE MONTH OF JANUARY 2023

TREATMENT PLANT/SEWER/OTHER INCIDENT INVESTIGATIONS

Pomona WRP High pH Influent

On Thursday, January 5, 2023, at 0554 hours, Pomona WRP operators called the IW Section and reported that the WRP had experienced an approximate 30-minute period of high pH influent earlier that morning. Operators stated that at 0334 hours the influent pH began rising until it peaked at 9.2, then returned to normal by 0407 hours. At the time of the incident, an operator was onsite and collected a sample of the high pH influent from influent channel #1. He described the sample as white-colored with orange foam on top and had no unusual odor. Beyond the high pH, the suspect material did not adversely affect any treatment processes. The operator was unsure which influent line the material entered on (north or south), but "guessed" it most likely came in on the south line.

Figure 1: Pomona WRP pH Trend

Investigating IW Inspectors obtained the WRP sample and verified the pH values. Caustic dosing and crown spraying schedules did not coincide with the incident. Inspectors described the sample as appearing much like past high pH organic waste influent. The investigation of upstream companies found Ling's to be the source of high pH wastewater impacting Pomona WRP. Ling's is a food manufacturer that uses caustic cleaners during their overnight sanitation operations. A verbal warning was issued to the company for adversely impacting the plant. IW staff is currently revising the company's IW permit, and IW inspectors have requested pH monitoring equipment and a possible upper pH limit.

Latex Paint Spill in Commerce

On Thursday, January 05, 2023, at 1010 hours, the Los Angeles County Fire Department's Health and Hazardous Materials Unit called the Industrial Waste Section and reported that they were onsite at a large spill of white latex paint, just north of the intersection of 61st Street and Eastern Avenue in the city of Commerce. At the time of the call, Southern California was experiencing a considerable amount of rain from the previous 8 to 10

hours. LACoFD Health Hazmat requested on behalf of the Potentially Responsible Party (PRP) to allow the discharge of an undetermined amount of the spilled latex paint mixed with rainwater into a nearby sewer manhole. The IW Section denied the request and provided information that similar spills are typically collected and hauled to an appropriately licensed centralized waste treatment facility (CWTF) for treatment and disposal. LACoFD Health Hazmat conveyed the information to the PRP.

Figure 2: White Latex Paint Spill Clean Up

The PRP is Ventura Transfer Company, located in the city of Commerce adjacent to a BNSF rail spur. LACoFD and Ventura Transfer staff surmised the likely cause of the spill was an unhoused person crawling under the railcar and opening the belly cap releasing the material. The company hired United Pumping Service to haul the spilled material to a tanker truck washing facility owned by Ventura Transfer Company in Carson, Ca, which has a current Industrial Waste Permit (FID #1389703, IW #3720). Ventura Transfer requested a one-time discharge allowance for the spilled material to be discharged through their Carson industrial waste pretreatment system and outfall.

After careful consideration and inspection visits, the Carson Ventura Transfer facility (# 3720) was granted approval for discharge of the stored spill material (25,000 gallons, white latex, rainwater) to the sewer at the Carson facility (IW #3720). Conditions of approval include the slow release of the material at no more than 5 gpm over an extended period, likely several weeks, to avoid having any negative impacts on the downstream operations at the Davidson City PP and JWPCP. The Company began discharge of the spill material according to the one-discharge conditions, and IW staff are closely monitoring the company regarding compliance. There have been no reported negative impacts to the Davidson City PP or JWPCP.

Whittier Narrows WRP Green Color

On Thursday, January 12, 2023, at 1629 hours, the Districts' Reuse and Compliance Section reported to the IW Section that the Districts' laboratory staff observed a slight green color in the Whittier Narrows WRP treatment plant effluent at 1002 hours on January 11, 2023. The laboratory staff were following-up on a report of a short (30-minute) filter bypass event at the WRP in the early morning hours on January 10, 2023. They were investigating whether the bypass event had any impact on the WNWRP receiving waters. The green-colored water was seen at the WRP's WN-004 outfall location when discharge was occurring from the WRP into the receiving waters. The Districts' staff deemed the observed amount of color present in the WNWRP

receiving waters did not constitute an NPDES violation. Nevertheless, their observation was reported to the IW Section for a possible industrial-source investigation.

Figure 3: WN-004 Discharge to Receiving Waters on Jan. 13, 2023

Figure 4: WN-004 Effluent (left) Comparison to Distilled Water (right)

Figure 5: WN-004 Discharge to Receiving Waters on Jan. 13, 2023

During the bypass event on January 10, 2023, there was a moderate amount of rainfall (0.83 in) in the vicinity of the WRP that likely contributed higher stormwater flows to the receiving waters. Investigating IW staff found no green color or evidence of green color in the immediate receiving waters or at WN-004 outfall. IW Inspectors found the WRP effluent clear and the receiving waters muddy. WRP operators reported no green color in any process waters within the timeline of this investigation. Moreover, operators reported some flooding issues at the WRP during the recent heavy rains.

United Site Services is the predominant source of green color entering WNWRP. United Site Services discharges chemical toilet wastes daily beginning at 2000 hours and continues until all operating service trucks are empty. Further, they use deodorant/blue-green color tablets in the portable toilets that they service. Although there was no direct evidence that the company's effluent caused the green color incident at WNWRP, the company was warned that the improper use of their color deodorizing tablet has historically been a source of color problems at the WRP. There have been no additional color incidents reported by the Operations Staff at WNWRP since the initial report of color. IW inspectors will continue to monitor WNWRP and United Site Services.

Pomona WRP High pH and Decreasing Dissolved Oxygen in Secondary

On Thursday, January 12, 2023, at 0856 hours, Pomona WRP operations staff called Supervising IW Inspector John Boyd and reported that the WRP had experienced a moderate increase in influent pH rising to 8.4-8.5 at the time of the call. An operator stated that the influent pH began rising at about 0600 hours that morning but had NOT tripped the influent pH alarm, which is set at 9. Additionally, the operator mentioned that the secondary aeration tank dissolved oxygen levels were decreasing and suspected the D.O. conditions may be related to the elevated pH. A similar rise in influent pH occurred the previous day, but it had not been reported to IW Section staff. A sample of the elevated pH raw influent was taken during the incident by operation staff.

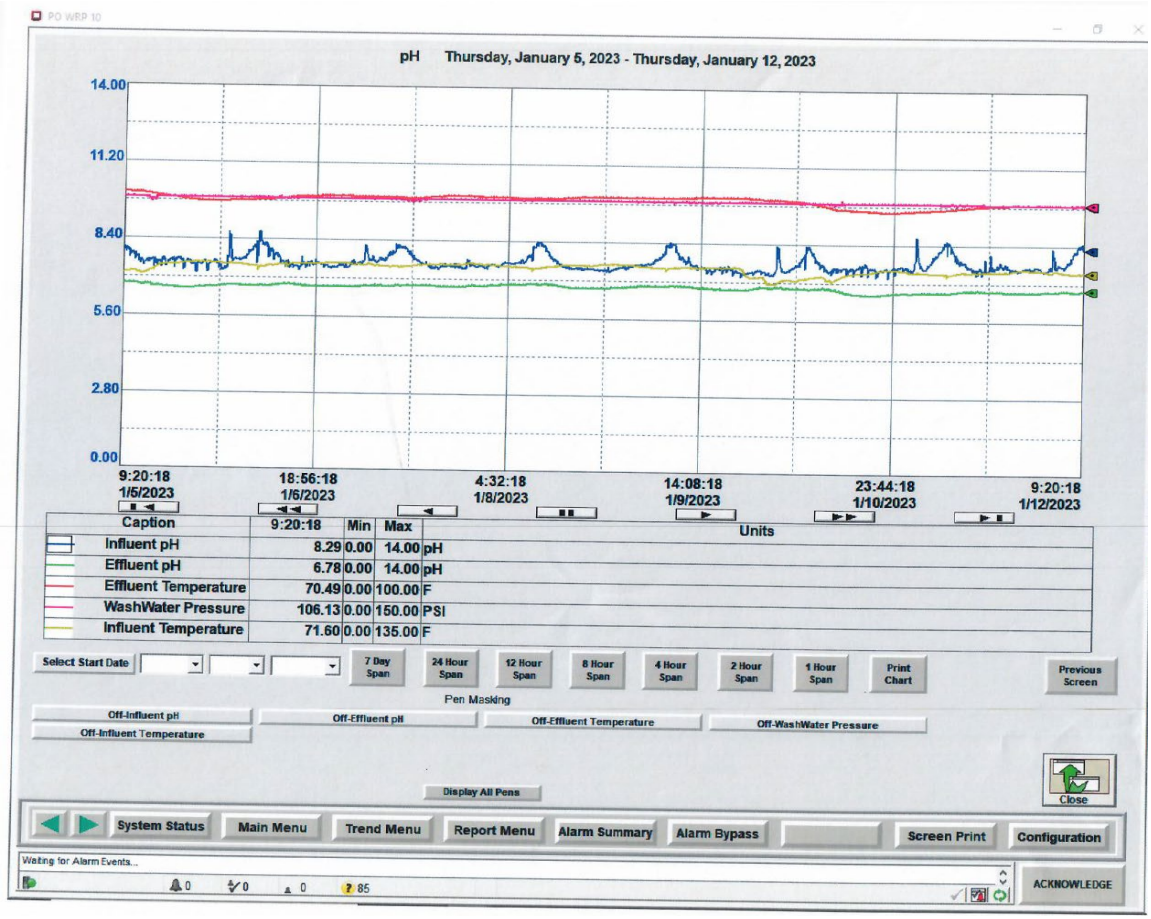

Figure 6: Pomona WRP pH Trend on Jan. 13, 2023

IW Inspectors investigated ten upstream facilities having risk factors aligned with the reported incident. The investigation found no likely source. The WRP pH and D.O. levels did not reach alarm levels, and WRP operations and processes return to normal. IW Inspectors will continue to monitor upstream dischargers and the WRP.

INDUSTRIAL WASTE SECTION
SUMMARY OF ACTIVITIES
FOR THE MONTH OF FEBRUARY 2023

TREATMENT PLANT/SEWER/OTHER INCIDENT INVESTIGATIONS

Phibro-Tech Off-Spec Discharge

On Tuesday, February 7, 2023, at 1510 hours, David Thaete of Phibro-Tech, (FID: 1892464, Permit: 21498) reported to Supervising Industrial Waste Inspector Stephen Sealy that the company had made an error interpreting lab data and had accidentally discharged approximately 7,000 gallons of treated wastewater that measured 47 mg/l copper. The facility's any time copper limit is 3.38 mg/l. The company also notified the Department of Toxic Substances Control (DTSC) to self-report the discharge of hazardous waste from their situs. Area Industrial Waste Inspector David Joh was notified and assigned to follow up with the company to determine the cause, the current disposition of the off-spec material, and how the company plans to eliminate the risk of such releases in the future.

Figure 1: Analysis data from Phibro-Tech's inductively coupled plasma mass spectrometer (ICP-MS)

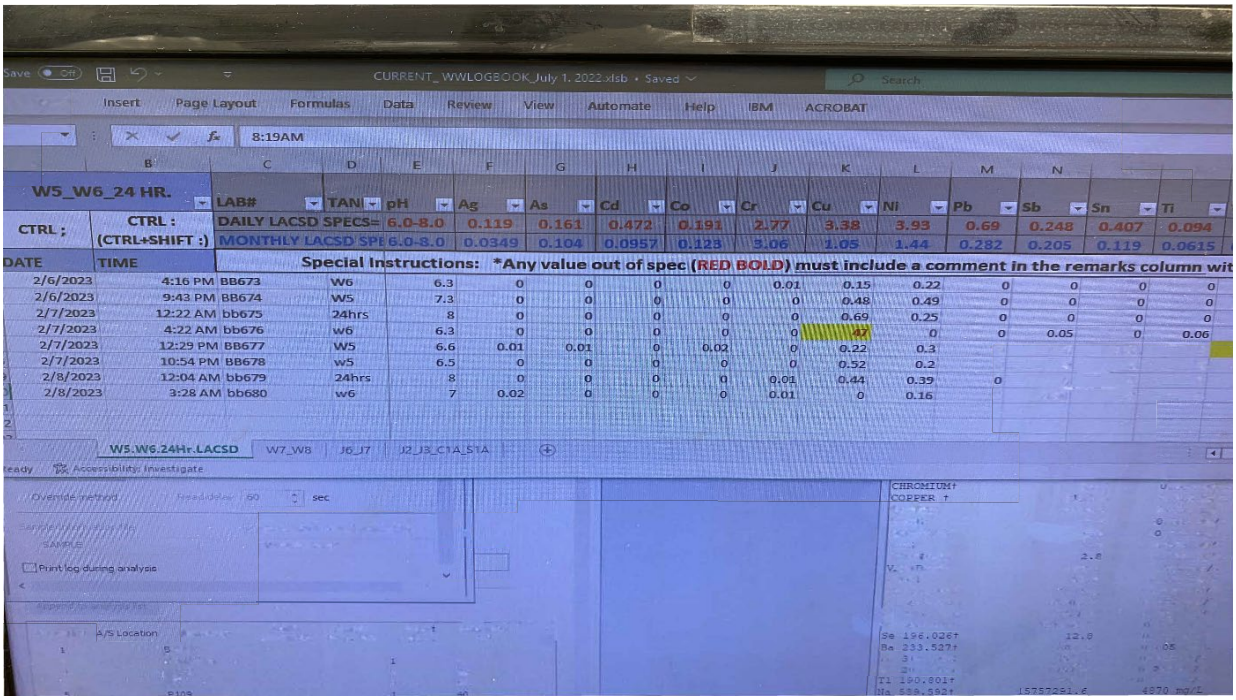

Figure 2: Retain Sample showing solids containing copper at 47mg/l from discharge batch 676

On Wednesday, February 8, 2023, Industrial Waste Inspector David Joh and Senior Industrial Waste Inspector Chris Mendoza responded to Phibro-Techs's self-report of off-spec discharge that occurred on Tuesday, February 7, 2023.

The investigation verified the facility had immediately ceased the off-spec release when they realized there was an error reading the lab data and the remaining approximately 20,000 gallons of the batch wastewater was returned to the pretreatment system. After re-treatment, the off-spec water was re-analyzed for copper which measured 0.26 mg/l, meeting permit limits for compliance and determined to be acceptable to discharge. Phibro-Tech retained a sample of the off-spec water (see figure2) which had faint tan color and orange sediment. Additional mass loading at the Joint Water Pollution Control Plant (JWPCP) from this event was minimal and no operational issues were experienced at the JWPCP.

CalEPA DTSC inspector Roger Kintz and LACSD IWI David Joh performed a joint follow-up inspection at the site on Wednesday, February 22, 2023, to verify LACSD findings, and to complete the DTSC response to the report. Phibro-Tech will generate a formalized response which will outline preventative measures including updates to staff training and standard operating procedures. The finalized response will be submitted to all involved agencies including LACSD, City of Santa Fe Springs Fire Department, and Cal EPA DTSC. No enforcement action by the LACSD will be issued at this time for the self-report of off-spec discharge from Phibro-Tech, Inc.

JWPCP Black Gelatinous Solids at J.O. 'B' Inlet

On Saturday, February 18, 2023, at 0337 hours, Senior IWI Tingting Wei received a voice mail from the JWPCP Primary Control operations stating a "black gelatinous substance" was entering through J.O. "A" and

J.O. “B” headworks impacting the primary tanks in E3 battery and skimming trough. Wei then notified Supervising IWI Bill Barnum at 0955 hours and initiated an investigation.

Figure 3: Gelatinous Solids from inlet works

Figure 4: Excess biosolids in conveyor/sump

Senior IWI Tingting Wei began the investigation verifying the solids were entering the plant at J.O, "A" and J.O, "B" inlet sewers and noted the material was in the primary tanks causing issues with the level sensors. The material was sampled and had similar properties to the black gelatinous solids found during previous black solids incidents at the JWPCP headworks. The material was similar to those past incidents in which the black solids had a "polymer" feel and no oily component. IWI Wei inquired if there were any solids processing problems, polymer leaks or equipment failures in Solids Processing. The investigation found that a belt conveyor in Solids Processing had broken and the solids from that conveyor area needed to be removed to allow for repair. The solids were washed to the headworks through the diversion structure that is currently open to both J.O."A" and J.O."B". and therefore, returned to the inlet works. Due to the information found during the preliminary part of the investigation, no industrial inspections were conducted as it is not likely an industrial discharger is responsible for this upset event.

Torrance Refining Effluent Monitors Power Outage

On Tuesday, February 28, 2023, at 1720 hours, Supervising IW Inspector Stephen Sealy called Supervising IW Inspector Bill Barnum after receiving a call from the Environmental Shift Supervisor from the Torrance Refining Company (FID 9249778) reporting that at 1710 hours electrical power was lost to the Van Ness outfall (IW 21899) effluent monitors. Effluent was immediately diverted to impound tanks until the power could be restored. This information was forwarded to Senior IW Inspector Tingting Wei for follow-up.

Night Shift Senior IWI Ting Ting Wei and IWI Nicholas Fields responded that same day at 1935 hours and were greeted on site by the head operator. He stated that the facility's control room received an alarm about a power outage at the off-site access location at approximately 1710 hours. An electrician came to the site shortly after and found that the main power switch had tripped. He was able to bring power back to the monitoring equipment at approximately 1755 hours. After reviewing the wastewater parameters with the monitoring equipment back online, the facility resumed discharging to the sewer at 1800 hours. Inspectors review of records also find the company correctly impounded the wastewater and there was no evidence of off-spec water discharge.

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INDUSTRIAL WASTE SECTION
SUMMARY OF ACTIVITIES
FOR THE MONTH OF MARCH 2023

TREATMENT PLANT/SEWER/OTHER INCIDENT INVESTIGATIONS

Whittier Narrows WRP Low Dissolved Oxygen in Aeration Tanks

On Monday, March 20, 2023, at 0903 hours Whittier Narrows WRP Operators reported to the Industrial Waste Inspection Staff that the treatment plant had experienced a low dissolved oxygen concentration event in the aeration tanks the preceding day, Sunday, March 19, 2023. The incident began at 0930 hours when the D.O. concentrations began declining to a minimum D.O. point of 1.30 mg/l at 1030 hours the same day. Treatment plant operators responded by reducing the incoming headworks flow while increasing the process air flow (see Figure 1). This action reversed the negative trend and restored normal D.O. levels in the aeration units. There were no other adverse operational effects reported. The incident lasted approximately 2 hours.

Figure 1. WNWRP Process Air, Headworks Flow & Aeration Units D.O.

Industrial Waste Inspectors immediately began investigating several known industrial facilities having the potential to discharge high-strength wastewater. These inspections included both the Thrifty Ice Cream and United Site Services facilities in El Monte. The Industrial Waste Staff was unable to identify a likely source of this incident. Nevertheless, the Industrial Waste Inspectors continue to be attentive to possible sources for these incidents.

High Sewer Flows into Marina Pump Plant #3

On Tuesday, March 21, 2023, at 1010 hours, Pumping Plant Operations staff called the Industrial Waste Section to report that ongoing heavy rains had significantly increased the hydraulic loads on the Marina Pump

Plant #3 and the nearby sewer lines to the extent of triggering high water level alarms at two monitoring sewer manholes. Pumping Plant Operations requested that Industrial Waste notify upstream industrial dischargers, Synergy Oil & Gas and The Termo Company, to temporarily cease discharge as part of an agreed process to provide relief during high flow conditions.

Synergy Oil & Gas and The Termo Company both immediately complied with the request to shut down discharge to the sewer. IW Inspectors verified that Synergy Oil & Gas shut down flow at 1100 hours and The Termo Company at 1128 hours. The Termo Company required offsite operators to drive to the site for their wastewater shutdown process. At 1245 hours the same day, both companies were notified they could resume wastewater discharge.

Long Beach Interceptor Pump Plant High Flows

On Thursday, March 23, 2023, at 1445 hours, Industrial Waste Inspection staff received a call from Pumping Plant Operations reporting that the Long Beach Interceptor Pumping Plant at the submersible side was experiencing elevated flows to the extent that pumps where operating up to 2 hours to draw down wet wells that normally take 8 minutes. Pumping plant staff mentioned the problem began at the beginning of a series of heavy rain events the previous week. Pumping Plant Operations identified that higher influent flows coincided with rain events but requested IW staff to investigate whether any industrial sources were contributing to the problem.

Figure 2. Submersible Side of Long Beach Interceptor Pump Plant

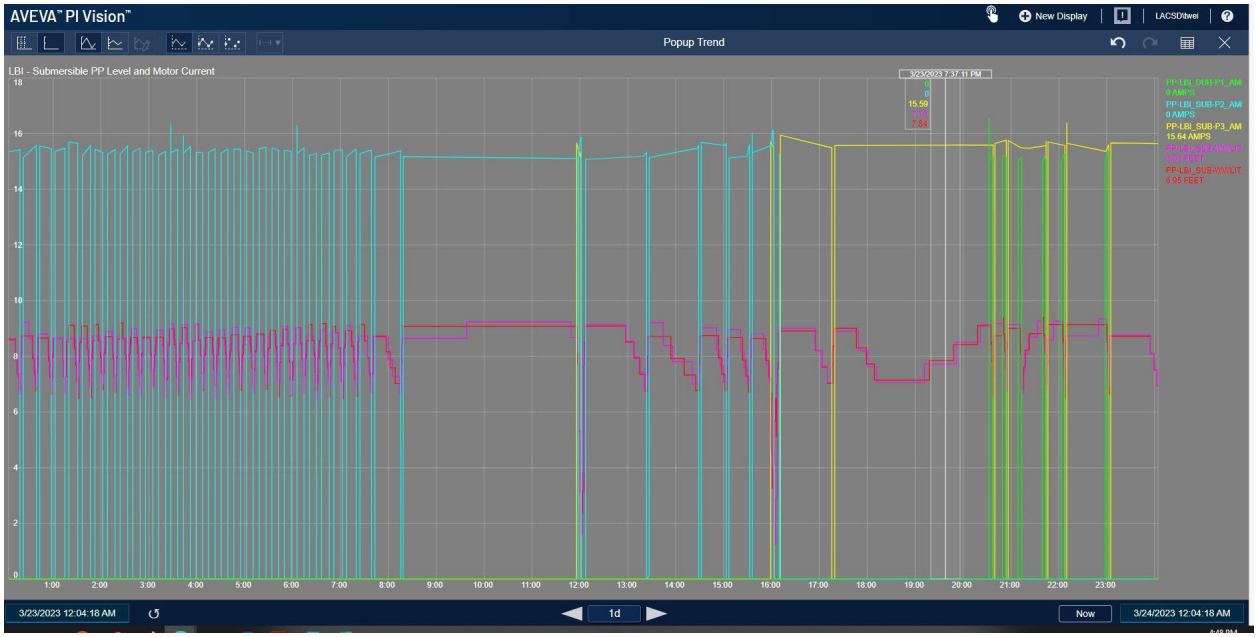


Figure 3. Submersible Pump Plant Level and Motor Current – 03-23-2023

IW Inspectors investigated the report and determined there were no contributory industrial sources to the elevated flows at the pumping plant. IW Inspectors found tributary industrial dischargers in compliance for rainwater diversion systems and peak discharge flow rates. Nevertheless, IW Inspectors noted some evidence of water infiltration into the influent sewer lines, which likely occurred during the recent storms. IW Inspectors will continue to investigate any potential rainwater intrusion from nearby facilities, including California State University Long Beach.

INDUSTRIAL WASTE SECTION
SUMMARY OF ACTIVITIES
FOR THE MONTH OF APRIL 2023

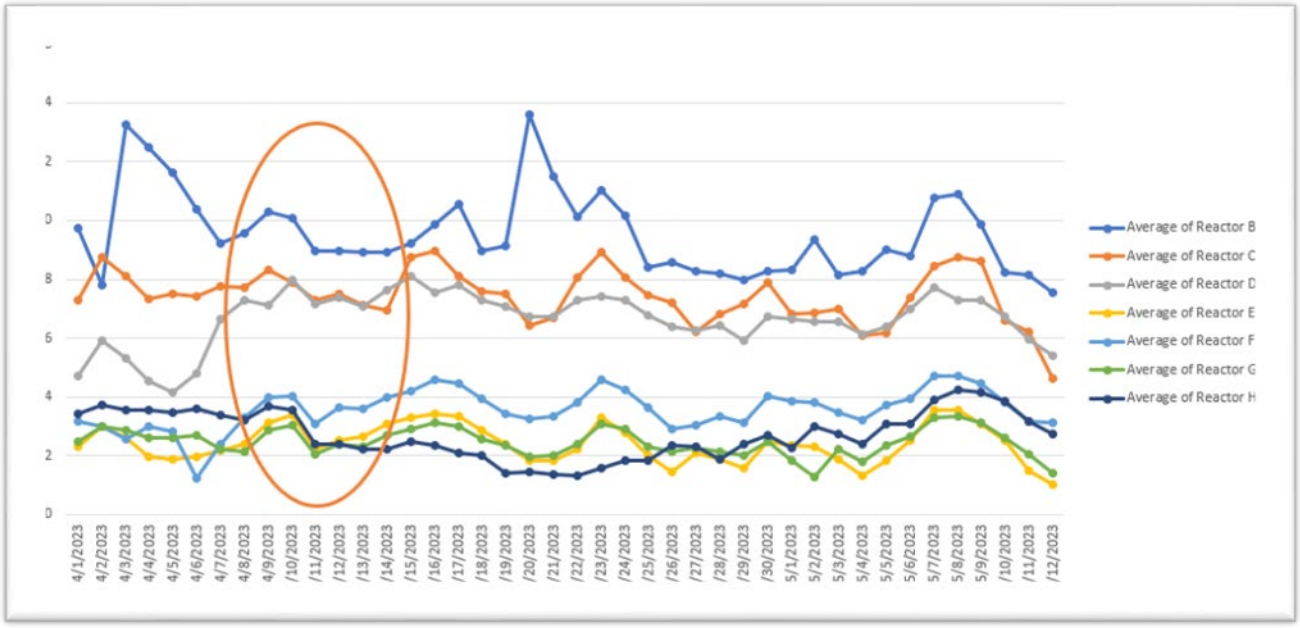
TREATMENT PLANT/SEWER/OTHER INCIDENT INVESTIGATIONS

JWPCP Low Dissolved Oxygen in Secondary Reactors

On Friday, April 14, 2023, the Industrial Waste Section received an email request from JWPCP Research Group reporting some concerns over declining dissolved oxygen (D.O.) concentrations in all secondary reactors including reactor "H" which is currently under study for nitrogen management. The declining D.O. was observed on April 10 and 11, 2023. The research group requested Industrial Waste to investigate any association between tributary industrial users and the decline in D.O. during these days. On Thursday, April 20, 2023, JWPCP Research Group again reported a similar decline in D.O. across all reactors. There were no other operational anomalies seen across all reactors or throughout operations. The Research Group mentioned some elevated LEL isolated to reactor "H". The elevated LEL might indicate an effect from the study.

Figure1. Daily average DOS FOR ALL Reactors. Dip in DO for all reactors circled in orange

The Industrial Waste Staff inspected nine significant industrial users having an oxygen demand risk for



JWPCP. None were found to have any adverse discharges that might have contributed to this incident. The D.O. concentrations have since returned to normal and there were no adverse impacts to plant operations. The Industrial Waste Inspectors will closely monitor the situation and provide any follow up investigation as deemed necessary.

Los Coyotes WRP Purple Color in Raw Influent

On Tuesday, April 25, 2023, at 0900 hours, Los Coyotes WRP Operations called the Industrial Waste Section to report purple-colored wastewater at the influent pH box. Industrial Waste Inspectors met with plant operations, confirmed the color, and collected a grab sample of the purple influent. Operations reported no other treatment plant anomalies to IW Staff. Further, Operations mentioned that the color seemed minor and unlikely to impact treatment operations. Industrial Waste Inspectors found no evidence of color in the influent sewer lines to LCWRP. Investigative inspections of the two largest industrial sources of color, Tri-Star Dyeing & Finishing and Shaw Diversified Services, found no samples of purple-color wastewater from either facility. Nevertheless, Inspectors observed Tri-Star Dyeing & Finishing had a sizable amount of finished purple fabric stored on the production floor. Tri-Star Dyeing & Finishing is a prime suspect and historically has discharged adverse color to LCWRP. There were no further adverse color or operational impacts to LCWRP.

Figure 1. Raw Influent Sample

Saugus WRP Excessive Ragging

On Friday, April 28, 2023, at 0915 hours, Saugus WRP Operations called the Industrial Waste Section to report excessive ragging at the influent grinder the previous day, Thursday, April 27, 2023. Saugus WRP Operators stated that the grinder overload alarm signaled at 1230 hours and again at 1435 hours on April 27. Both alarms were cleared by de-ragging the influent pumps. After a second grinder failure alarm, Operations applied back up comminutor #2, which overloaded at start up from a collection of rags blocking the teeth. Once these rags were cleared, the plant operated normally and without any further incident.

Industrial Waste Inspectors visited the plant and observed sample rags retained from the incident. The rags appeared to be an assortment of "flushable" wipes and disposable cleaning rags often observed in the influent. An investigation found no upstream industrial source of the wipes. Nevertheless, a review of the Saugus Liquid Waste Disposal Station records indicated the station received 15 loads on the day of the incident and 17 loads the day prior, many of which were from concerts and outdoor events. Since the incident, Operations reported normal treatment plant conditions and no excessive ragging. The plant is now operating the influent grinder and comminutor, which serves to mitigate the rags.

Figure 3. Sample of Influent Rags

INDUSTRIAL WASTE SECTION
SUMMARY OF ACTIVITIES
FOR THE MONTH OF MAY 2023

Los Coyotes WRP Low Dissolved Oxygen Levels and High COD

On Wednesday, May 03, 2023, at 0955 hours, Los Coyotes WRP operators notified IW Inspection staff of an ongoing issue with low dissolved oxygen (D.O.) and high secondary-effluent COD. The principal incident occurred on April 28, 2023, at approximately 1030 hours when secondary D.O. dropped sharply to near 0 mg/l for about 30 minutes (see Fig 1.) In addition, on April 28, 2023, secondary-effluent COD results were 62 mg/l, instead of an average 30 mg/l. There were no reported odors, colors or other indicators associated with this event. LCWRP Operators continued to observe fluctuating D.O. values that compelled Operations to notify IW Inspection on May 03, 2023.

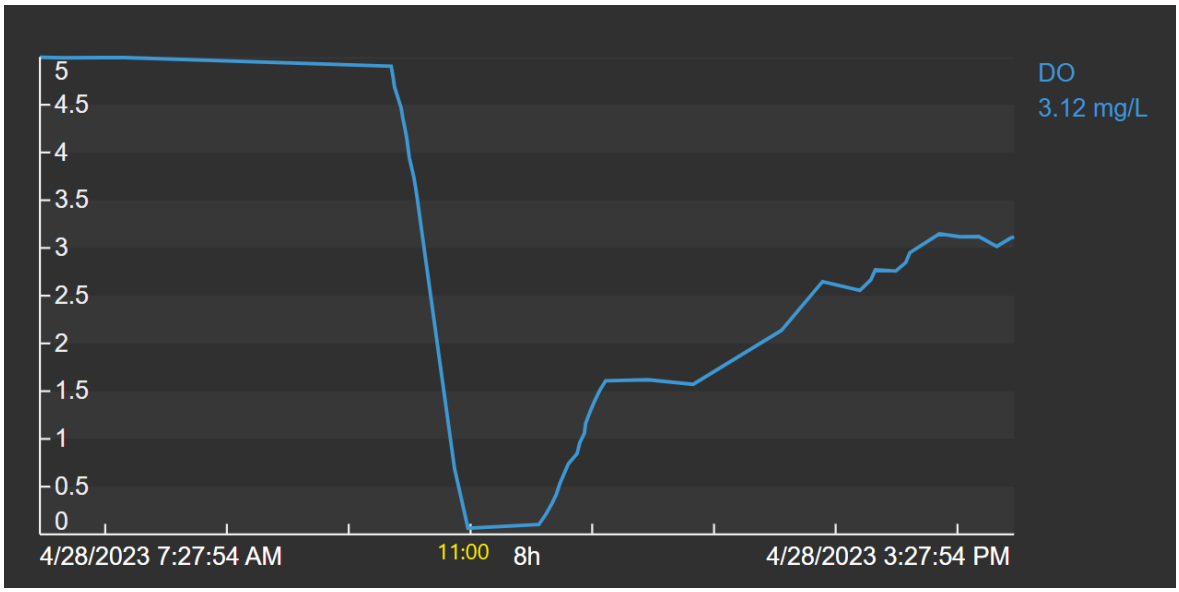


Figure 4. Dissolved Oxygen on 04/28/2023 LC Aeration Tank (PI Vision)

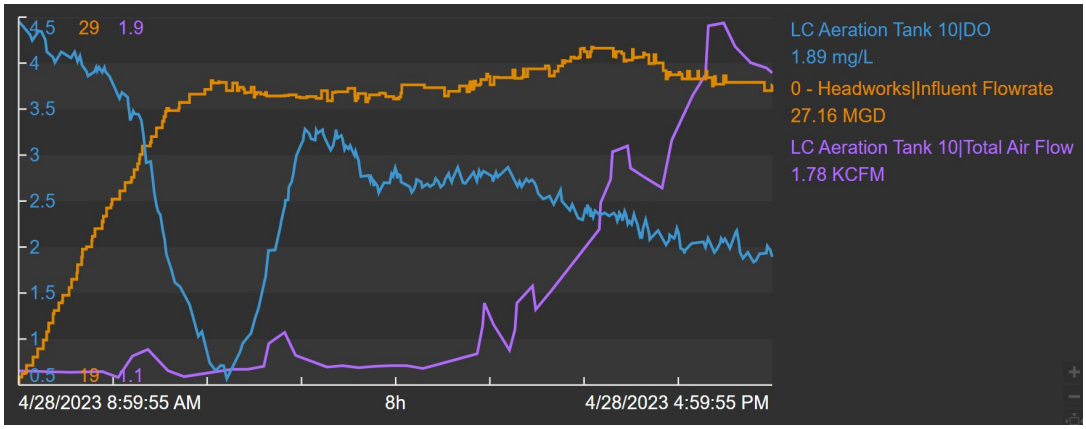


Figure 5. Dissolved Oxygen, WRP Flow, & Air Flow – 04/28/2023 (PI Vision)

IW Inspectors investigated 10 significant COD dischargers tributary to LCWRP. None were identified as the source of COD loading on LCWRP during the incident timeframe. All companies were in permit compliance except Bumble Bee Foods, LLC (FID 2067191, IW#016412). Bumble Bee Foods was issued a Notice of Violation (NOV) for a flow rate exceedance. Despite the NOV, there was no evidence of any high COD strength wastewater discharged from this facility in relation to the incident. It should be noted that Shasta Beverages, Inc (FID: 2037456, IW#015351) has historically adversely impacted LCWRP with high strength COD discharges. Shasta was inspected twice during this investigation. Although no direct evidence was discovered, Shasta will remain a company of interest and will be subject to follow up inspections. IW Inspectors continue to monitor this situation closely.

Whittier Narrows WRP Low Dissolved Oxygen Levels in Aeration Tanks

On Monday, May 15, 2023, Whittier Narrows WRP operators again reported to the IW Section that there had occurred another low dissolved oxygen (D.O.) concentration event in the aeration tanks. This is the third low D.O. incident since January 01, 2023. This incident occurred during the weekend on Saturday, May 13, 2023, and again Sunday, May 14, 2023. Both incidents occurred during the morning hours between 0800 hours and 1100 hours.

Operations stated that in this latest incident the D.O. concentrations dropped to 0.50 mg/l on Saturday, May 13, and 0.40 mg/l on Sunday, May,14. In addition to the low D.O. concentrations, WRP operators are observing some ammonia "bleed through" in the secondary effluent that is likely caused by the low D.O. condition. The D.O. concentrations recovered to normal as the plant increased air flow and decreased influent flow. There were no other indicators associated with this incident, such as color, pH, odor, or oils.

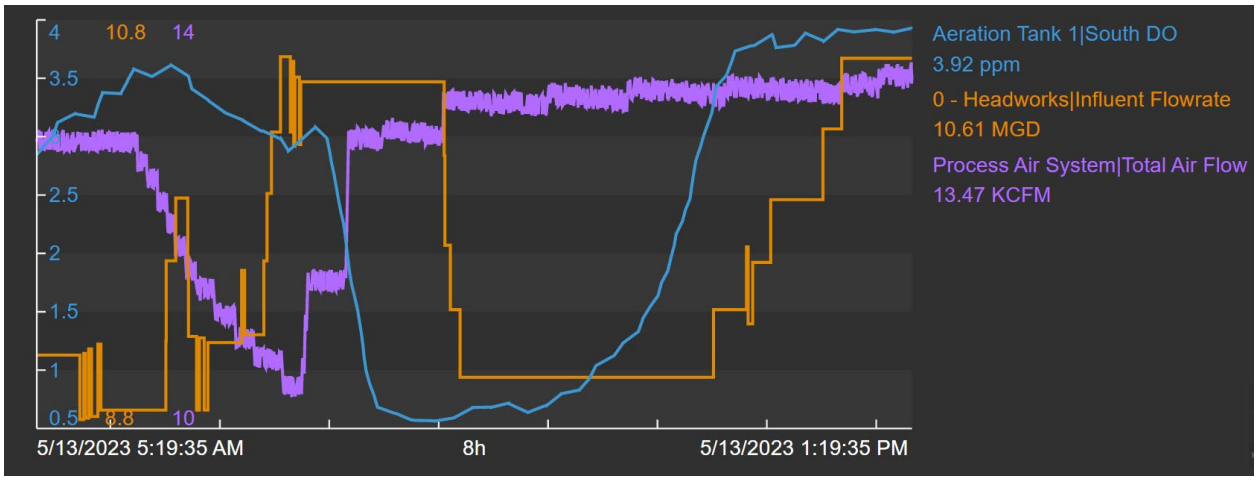


Figure 6. WNWRP Aeration D.O. Concentration, Air Flow & Influent Flow (PI Vision)

The Treatment Plant Laboratory sampled and analyzed Chemical Oxygen Demand (C.O.D.) plant samples from 0600 hours on May 14, 2023, to 0600 hours on May 15, 2023. Results for the COD analysis were the following: Raw, influent: 817 mg/l; Primary effluent: 487 mg/l; and secondary effluent: <25 mg/l. These results did not indicate any high C.O.D. wastewater entering the plant.

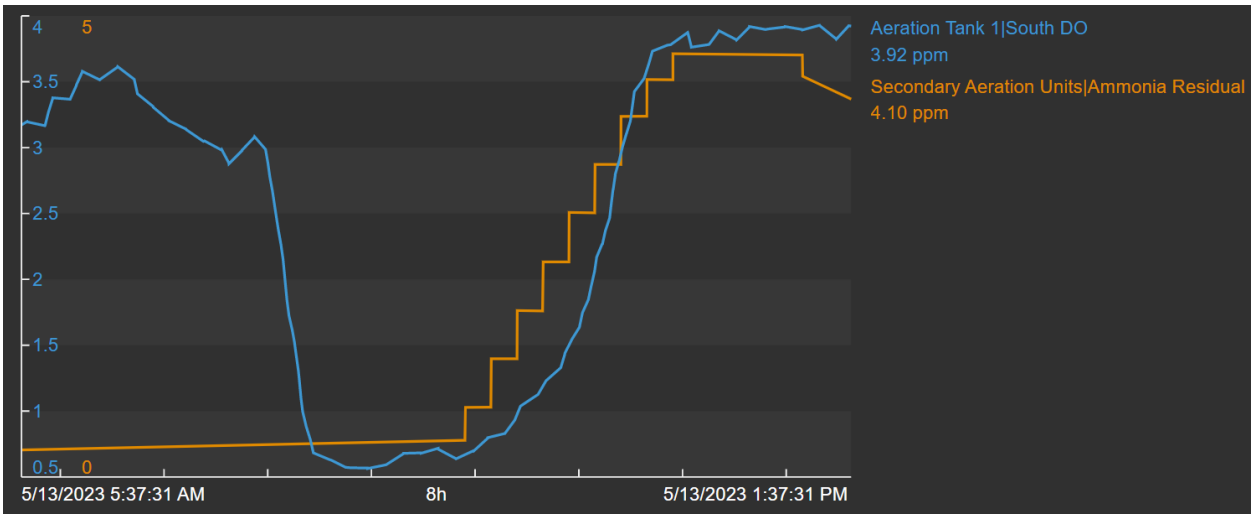


Figure 7. LCWRP Dissolved Oxygen Concentration & Ammonia Residual

Investigating IW Inspectors didn't identify any industrial source(s) as having evidence that they caused this incident. Nothing unusual was noted at upstream industrial wastewater dischargers that were inspected including the Thrifty Ice Cream manufacturing facility, the United Site Services portable toilet dumping facility, and the Ted Levine drum reconditioning company. IW Inspectors continue to monitor this situation very closely and are working closely with WNWRP operators and plant lab personnel.

JWPCP Primary Effluent Elevated Ammonia

On Friday, May 19, 2023, Wastewater Research Section emailed Supervising Industrial Waste Inspector Steve Sealy to report, JWPCP was experiencing elevated ammonia at the primary effluent. On the same day, a follow up call from Wastewater Research reported to Senior Industrial Waste Inspector Nattapong Pengphol that the MWD plant was also experiencing high elevated ammonia. Initially, the reported elevated ammonia was stated as primary effluent entering test reactor "H". However, IW Inspectors discovered elevated ammonia in the header line, which feeds all reactors.

IW Inspectors investigated two significant industrial sources having a potential to discharge ammonia laden wastewater. Both facilities were determined to be in compliance and there was no evidence of spills at either facility. It should be noted that JWPCP also experienced an abnormal volume of skimmings (solids) at JWPCP E3 sedimentation tanks, which may have contributed to the elevated ammonia levels. The timeframe in which solids were detected at E3 and the elevated ammonia at the MWD Demo Plant may corelate to skimming solids buildup as a source. Ammonia is a possible product of anerobic digestion of the skimming solids within the primary E3 sedimentation tanks. Furthermore, ammonia may also be entrained in the skimming solids. Laboratory analysis may be required to verify plant skimming solids as a source. Nevertheless, IW Inspectors will remain vigilant for any industrial source of ammonia that may affect JWPCP.

JWPCP Grey "Polymer" Material in JO.B Inlet

On Saturday, May 20, 2023, at 2235 hours, Senior IWI Tingting Wei received a voicemail from JWPCP Operations describing what appeared to be "polymer" materials entering the JO.B headworks "messing up" the sludge blanket level sensors in the primary sedimentation tanks. In a subsequent phone call, Operations stated that the sedimentation tanks 37-55 were overwhelmed by the "grey materials," and the level sensors were zeroed out.

On Tuesday, May 23, 2023, Supervising IWI Andrew Woods received a call from Primary Operations at JWPCP regarding loaded skimmings in the sedimentation tanks. During a follow-up call with JWPCP Operations at 1550 hours, Senior IWI Tingting Wei was informed that Operations again noticed the loaded skimmings in tank 37-55 (Unit 7&8). The sludge blanket level sensors were zeroed out from 1124 hours to 1443 hours. Operations did not observe any unusual materials in the JO. B inlet, so no samples were collected.

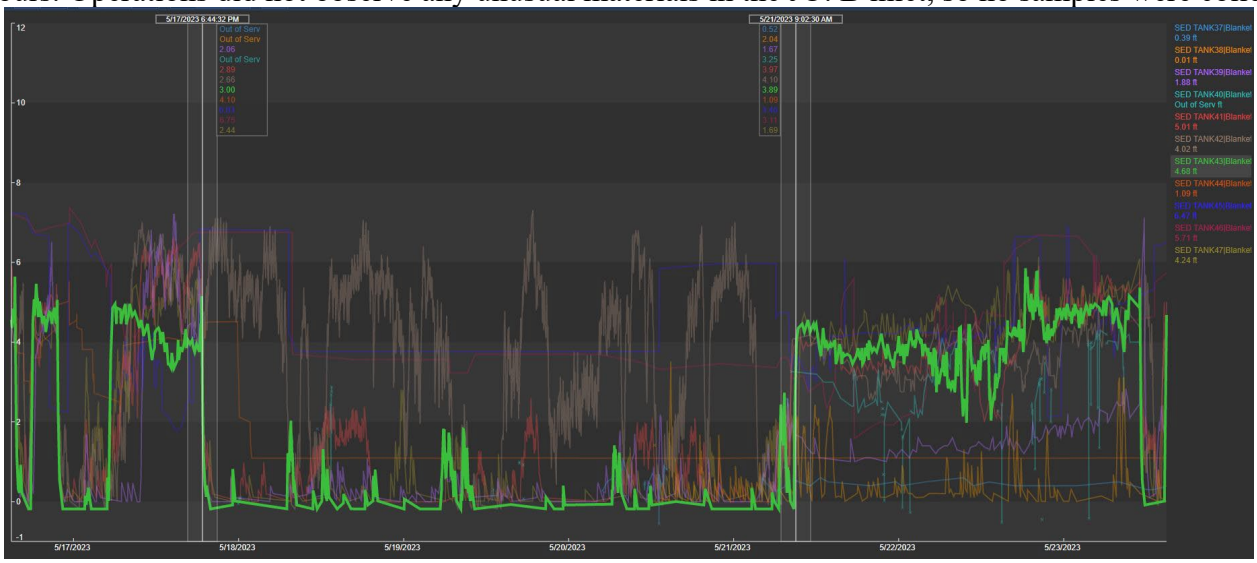


Figure 8. Sludge blanket level trend 5/16-5/23

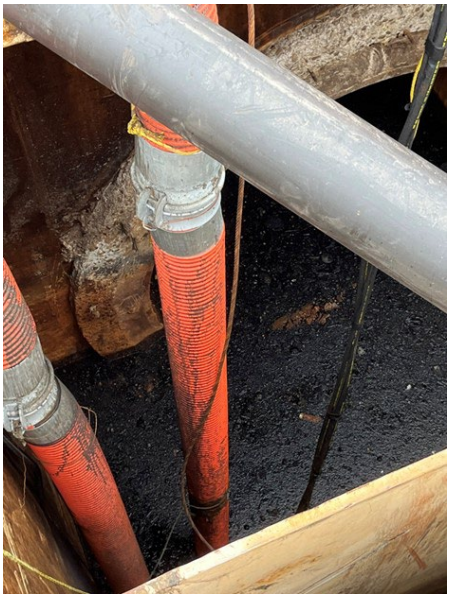


Figure 6. Diversion at stoplog shows heavy amount so floating solids

Industrial users with the potential to impact JWPCP were inspected for potential solids or polymer loading. No users were found to contribute or cause the solids loading in JWPCP E3 South Primary Sedimentation Tanks. Inspection staff will remain vigilant and continue to look for industrial sources that may have contributed to the plant upset. Notable upstream maintenance activities include the J.O. -B Unit 1A relining project. A stoplog has been placed at MH B 0926 and 3 large mobile pumps are being used to drain the sewer section. On May 20, 2023, night inspection, 2 out of the 3 pumps were on, drawing down to the bottom of the line. Contractor's comments as well as IW Inspection staff visual observation on Monday, May 22, 2023, (when the lines not being drawn down to the very bottom, only 1 pump was running) this suggest the line is heavily impacted with solids.

INDUSTRIAL WASTE SECTION
SUMMARY OF ACTIVITIES
FOR THE MONTH OF JUNE 2023

TREATMENT PLANT/SEWER/OTHER INCIDENT INVESTIGATIONS

Tea Color at Los Coyotes WRP Effluent Forebay

On Thursday, June 1, 2023, at 0625 hours, Los Coyotes WRP Operations called the Industrial Waste Section to report "tea-colored" wastewater at the Effluent Forebay. Industrial Waste Inspectors met with plant operations to confirm the color and collect a grab sample from the Effluent Forebay. Operations reported no other treatment plant anomalies to IW Staff.

Investigative inspections at the two largest industrial sources of color, Tri-Star Dyeing & Finishing and Shaw Diversified Services, found no wastewater samples indicative of tea-color wastewater from either facility. Nevertheless, Inspectors observed Tri-Star Dyeing & Finishing had a substantial amount of dyed fabric stored on the production floor indicating a robust production schedule. Moreover, finished dyed fabrics were in colors that could generate tea-colored wastewater. Although no "tea-colored" effluent was observed during the inspection, an effluent color dilution test result led to the issuance of a Notice-of-Violation for failing to comply with the permit-required effluent qualitative color test. Tri-Star Dyeing & Finishing is a prime suspect and historically has been a source of adverse color to LCWRP. There were no further adverse color or operational impacts to LCWRP.

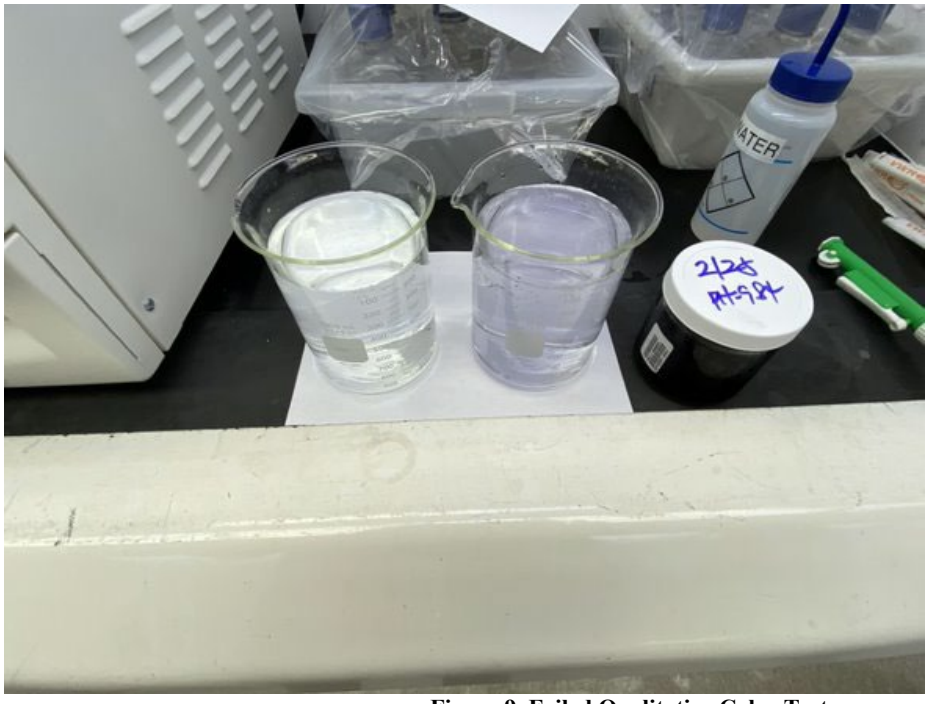


Figure 9. Failed Qualitative Color Test

Whittier Narrows WRP Low Dissolved Oxygen in Aeration Tanks

On Thursday, June 01, 2023, at 0809 hours, Whittier Narrows WRP Operations called the Industrial Waste Section to report low dissolved-oxygen (DO) concentrations in the secondary aeration units. The DO levels declined to 0.50 mg/L (*Figure 1.*). WRP Operations further described a previous low DO incident occurring on May 14, 2023, which found aeration process DO levels declining to 0.40 mg/L. Both incidents occurred in the morning between 0800 and 1100 hours. In both cases, WRP Operations responded by reducing the incoming headworks flow while increasing the process air. This action reversed the negative trend and restored normal D.O. levels in the aeration units. IW Inspectors received Raw and Primary Effluent grab samples taken by plant operations during the incident. There were no other adverse operational effects reported.

Figure 10. WNWRP Process Air, Headworks Flow & Aeration Units D.O.

Industrial Waste Inspectors performed several inspections at major tributary dischargers having an elevated risk for Chemical Oxygen Demand (COD) to WNWRP. No clear industrial source was identified during the investigation. Furthermore, inspections at lesser dischargers found wastewater operations in compliance and having normal production practices. WNWRP COD grab sample results did not demonstrate elevated levels of Chemical Oxygen Demand in either the influent or primary effluent locations. Nevertheless, IW Inspectors will continue to monitor tributary dischargers and work with Operations staff to resolve this.

Elevated LEL in Secondary Reactor H at JWPCP

On Friday, June 2, 2023, at 0948 hours, the IW Section received an email from Wastewater Research reporting elevated combustible gas at JWPCP in Stage 1 Secondary Reactor "H." Combustible gas is measured by the lower explosive limit (LEL), which peaked at 20% (LEL) in Stage 1 Secondary Reactor "H." Research Staff did not observe similar LEL trends in Reactors B, C, D, E, F, G, or H. Reactors A and B were not in service. No other treatment plant anomalies were reported.

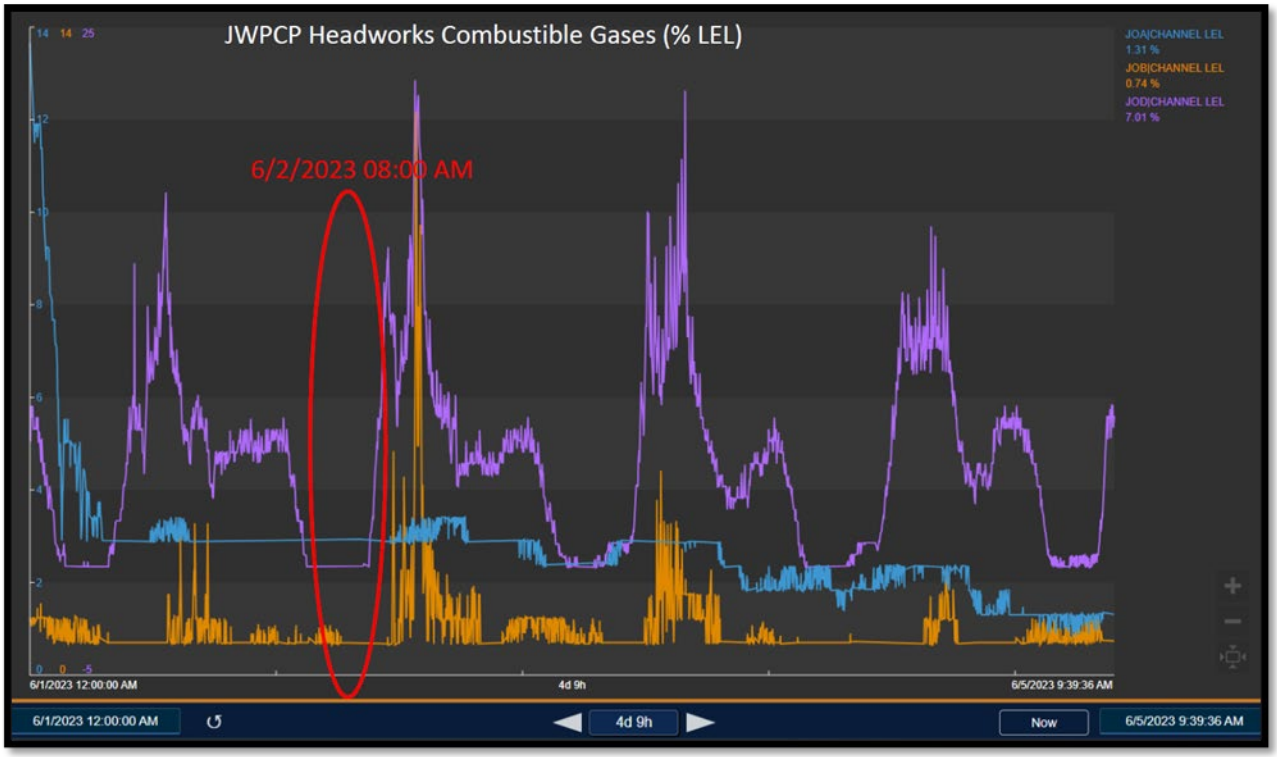


Figure 11. JWPCP Headworks Combustible Gases (%LEL) showed no combustible material entering the plant before the Reactor H incident.

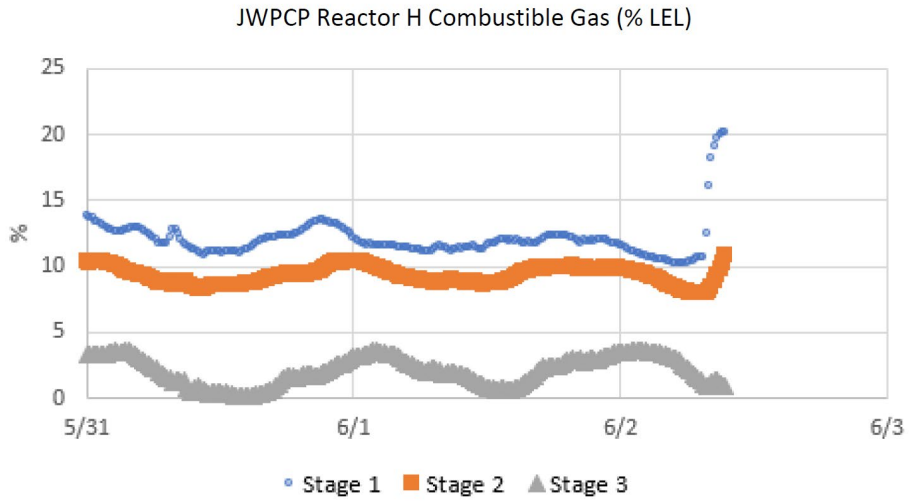


Figure 12. JWPCP Reactor H Combustible Gas (%LEL)

IW Inspectors initiated an investigation by reviewing the LEL trends in PI Vision for the inlets of JO-A, JO-B, and JO-D. The trends solely exhibited diurnal patterns and did not demonstrate any correlation with the elevated LEL levels detected in reactor "H"." Inspection at the skimming troughs of the E1, E2, and E3 primary sedimentation tanks revealed no indications of excessive oil or solids loading. Investigative inspections at the Tesoro Carson, Tesoro Wilmington, Phillips 66, Torrance Refining, and Valero Ultramar refineries did not find any evidence suggesting that these refineries are the source of the elevated LEL in reactor “H.” It is worth mentioning that reactor “H” is currently undergoing a Nitrification and Denitrification process (NDN) for research purposes, which sets it apart from the other reactors. Since April, the LEL in reactor “H” has been consistently rising, coinciding with the conclusion of the heavy rainy season and the beginning of the flow diversion for the JOB relining project.

Excessive Solids in E3 South Skimmings at JWPCP

On Sunday, June 4, 2023, at 0230 hours, IW Section received a call from JWPCP Operations reporting excessive solids loading in the skimmings trough at the primary sedimentation tanks of E3 South. Operations collected samples from the E3 Skimmings trough, as well as the JOA, JOB, and JOD inlets. According to Operations, the material entered for a brief period. On Monday, June 5, JWPCP Operation staff mentioned to IW Inspectors that E3 South experienced several episodes of excessive solids loading between Friday, June 2, Graveyard Shift, and Sunday, June 4, Graveyard Shift. However, they described the solids as having a normal appearance and no traces of polymer or petrol odor. These solids had a minimal impact on the wastewater quality of the primary treatment process.

Upon examining the samples collected by Operations, it was determined that they exhibited the typical characteristics, including appearance and odor, commonly observed in wastewater received at the JWPCP. Based on our findings, we think the excessive solids loading incident over the weekend is correlated to the ongoing J.O. 'B' relining project. A stop-log was installed at manhole B 0925 and B 0926 a few months ago to redirect the entire flow from the old J.O. 'B' Unit 1A to the J.O. 'B' Unit 1A Replacement.

Gray Solids at J.O. "A" Headworks – JWPCP

On Wednesday, June 06, 2023, at approximately 1120 hours, JWPCP Primary Control Operations left a voicemail message with the IW Section reporting gray solids entering the J.O. "A" inlet to the headworks and that operators were collecting samples. IW Inspectors called Operations to discuss the incident. According to Operators, the JWPCP laboratory contacted Operations when they were unable to collect their daily sample due to thick mats of floating gray material in the J.O."A" inlet.

An internal investigation upstream of J.O. "A" inlet at the JWPCP found that a non-routine deep cleaning of a concentrated-polymer storage tank (Tank 1) took place on June 6, 2023. The bulk of the polymer was vacuumed and stored in a solids-dewatering pit for future disposal. Some rinse water from the "cleaned tank" was drained to a sump plumbed to J.O."A", which may have introduced residual concentrated polymer into the JWPCP J.O."A" inlet. This event, in combination with 14 truckloads of food waste slurry received at the Carson liquid waste disposal station between 0600 and 1200 hours on June 6, 2023, may have led to some E-1 and E-2 skimming issues and the inability of the lab to obtain samples through the thickened floating mat at the J.O. "A" inlet.

Figure 13. Heavy grease/solids impacting JWPCP J.O."A" bar screens.

Tesoro Refining Wilmington Fire

On Friday June 09, 2023, at 1415 hours, Tesoro Refining & Marketing Company LLC (FID 9241931) reported a small fire at the refinery's De-Coking Unit caused by self-ignition of "gas oil" due to a leak at a pressure gauge. The facility representative reported approximately 500 gallons of water was used and immediately impounded. The refinery stated that no aqueous film forming foam (AFFF) was used to extinguish the fire. The fire was described as a pump fire at a seal oil leak.

Onsite refinery representative estimated approximately 2837 barrels, or 119,154 gallons of combined firewater and impounded wastewater retained in the facility's stormwater holding tank (Tank 143000). There was no evidence that AFFF was used to extinguish the fire. The impounded wastewater will be analyzed for treatability and routed through the appropriate treatment systems. Industrial waste inspectors evaluated the wastewater quality being discharged from the facility's legal sampling location and did not find any concerning characteristics within the wastewater. Inspectors noted that the wastewater was darker than historical observations, which may be attributed to an unrelated, ongoing maintenance activity of the facility's discharge tank (Tank 80043). The facility followed the required notification and impoundment protocols set by the wastewater permit, and thus no enforcement action was necessary. Furthermore, there was no impact to our downstream collection systems and treatment plant.

San Jose WRP Creek East Toxicity

On Tuesday, June 13, 2023, at 0900 hours, San Jose Creek WRP Laboratory Section called the IW Section to report toxicity at San Jose Creek-East WRP. The Laboratory Section reported toxicity as the measured effects on reproductive and mortality rates to the daphnid, Ceriodaphnia dubia (Water Flea). The subject sampling events occurred in May 2023 and June 2023. Subsequent lab analysis indicate that the toxicity is likely from a metal contaminant, possibly zinc or aluminum.

IW Inspectors conducted inspections at 13 companies having zinc, copper, chromium, and aluminum risks to SJCWRP-East. Of the 13 facilities inspected, two companies were identified as parties of concern: Acrylatex Corporation in Azusa and Stabile Plating located in Covina. Acrylatex Corp. is a paint recycling facility that has the potential to generate wastewater having elevated levels of zinc. The company was found to have more than 300 Intermediate Bulk Containers (IBCs) (*approximately 100,000 gallons*) of reclaim-paint wastewater stored at the facility. Moreover, company records indicated that the company discharged more than 20,000 gallons of wastewater during the time frame of the toxicity event. Stored wastewater samples were taken for laboratory analysis, results are pending.

The second company, Stabile Plating, is an aluminum anodizing facility tributary to SJCWRP-E. Wastewater samples taken at Stabile Plating revealed exceedances for chrome and copper. Although there are no discharge limits for aluminum, the sample result found 1140 mg/l of aluminum. IW Inspectors issued a notice-of-violation to Stabile Plating for chrome and copper phase 1 limit violations. The investigation will remain active pending further sample results, and inspectors will continue to monitor metal-bearing wastewater dischargers upstream of
SJCWRP-E.

Figure 14. Acrylatex Wastewater IBC Totes

Saugus WRP High Influent Ph

On Saturday, June 17, 2023, at 0953 hours, Saugus WRP Operations emailed the IW Section to report a brief, high pH influent spike that occurred the previous day, Friday June 16, 2023. On Tuesday June 20, 2023, IW Inspectors responded to the email and met with Saugus WRP Operations to discuss the incident. Operations stated that the subject high pH influent began rising at 1211 hours on June 17th , peaked at pH 10.25, then returned to a normal pH range by 1243 hours the same day. Operations were onsite at the time of the incident and collected a sample of the high pH influent as well as samples from primary effluent, aeration unit #3, and final sedimentation tank #2. The WRP flow was 5.05 MGD at the time of the pH spike.

Additionally, Operations noted two brief, overnight increases in primary effluent ammonia concentrations. The first anomaly happened on Sunday, June 11, 2023, at 2000 hours, and the second occurred on Thursday, June 15, 2023, at 2100 hours. Ammonia concentrations reached 47 ppm and 45 ppm respectively, whereas normal is about 39 ppm during evenings. Both spikes in pH and ammonia had no adverse impacts on operations or treatment plant effluent.

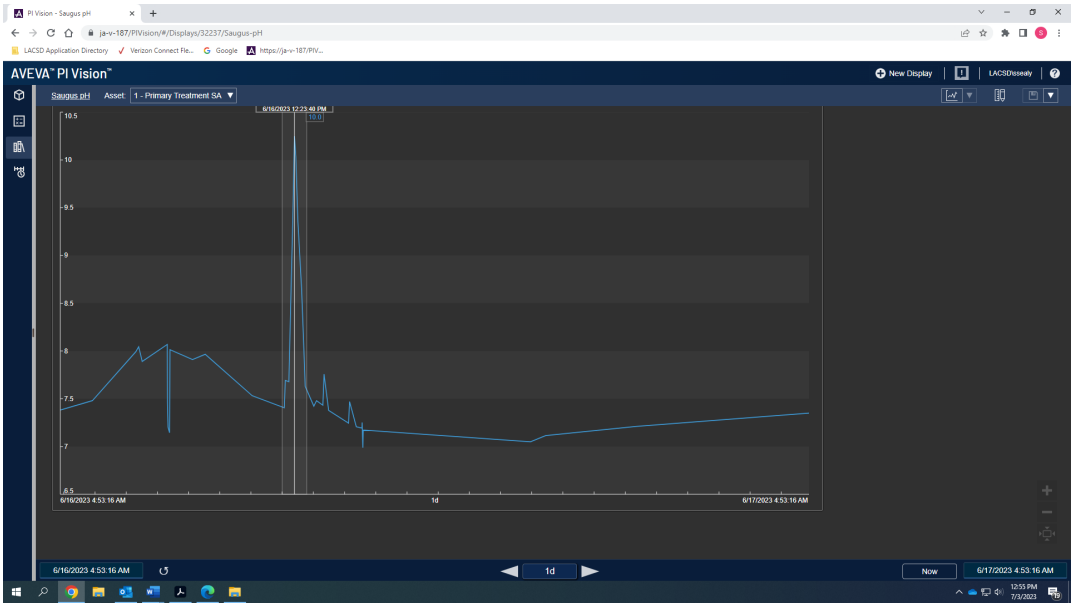


Figure 15. Saugus WRP pH Trend June 16, 2023

IW Inspectors investigated 5 permitted facilities having WRP risks for elevated pH and/or ammonia at Saugus WRP. Suspected sources include the Saugus WRP liquid waste disposal station, a chemical manufacturer, a drinking water treatment plant, and rubbish waste bin washing facility. No evidence was found linking these facilities with the high pH or elevated ammonia incident. Furthermore, a review of the sewer maintenance schedule showed no crown spraying or caustic dosing upstream of the plant. This event had no negative impact on SAWRP operations. Operator's influent grab sample from June 16, 2023, was submitted for 7 metals analysis; results are pending. Follow up inspections at tributary industrial users will be performed to ensure continued compliance with permit requirements.

Marina Pacifica Odor Complaint

On Wednesday June 21, 2023, at 1305 hours, Industrial Waste Section was notified of an odor complaint made by a Marina Pacifica Community Resident. The resident filed a complaint on Wednesday June 21, 2023, at 1133 hours that described the odor as an "overwhelming" chemical odor during "mild" wind strength and most prevalent around midnight to 0300 hours for the past four weeks. The odor was reported near the Marina Pacifica 2 pump station on 2nd and Pacific Coast Highway intersection.

IW Inspectors investigated four permitted industrial facilities in the vicinity of the Marina Pacifica 2 Pump Plant. No direct cause of the odor was identified. However, a possible odor source may be the removed equipment and/or open boreholes at Synergy Oil & Gas, LLC (FID9247862, IW21422). The facility is currently conducting maintenance on two different oil wells, both of which are approximately 10,000 feet deep. The boreholes are left open to the atmosphere during maintenance. Wastewater samples were taken at facility's legal sampling location for benzene, toluene, ethyl benzene, and xylene. The facility was made aware of the odor complaint. In addition, IW Inspectors resealed manholes within the vicinity of Marina Pacifica Pump Plant 2 with caulk to minimize any odor dispersion.

Figure 16. Marina Pacifica GIS Map

Frito Lay Spill to Storm Drain

On Saturday, June 24, 2023, at 1421 hours Charles Nicholson of Frito Lay (FID 2014095) emailed the IW Inspection Staff reporting a spill of oily cornmeal waste on June 23, 2023, at 1840 hours. According to the contact, a level sensor that energizes a treatment system pump failed causing a cornmeal-waste storage tank to overflow into a nearby drain, which is plumbed to a stormwater trench (*figure 9*). On Monday June 26, 2023, IW Inspectors responded with IEUA Inspectors to investigate the impact of the

spill. Inspectors and facility staff were unable to determine the specific volume of cornmeal wastewater that overflowed into the stormwater trench (*Figure 9*). Nevertheless, the company was required to record an estimated spill volume and final disposition of the spill in their permit required spill log. This spill did not affect the IEUA or CSD sewer systems, and therefore no further actions by our agency was required. IEUA personnel referred the spill to the appropriate local stormwater agency.

Figure 17. Trench Prior to Storm Drain

Equilon Enterprises CGMS Alarm

On Tuesday June 27, 2023, at 1846 hours, Equilon Enterprises, LLC dba Shell Oil Products (FID 2024720, IW 014939) notified the Industrial Waste Section that the facility's combustible gas monitoring system (CGMS) had exceeded the upper-level alarm lower explosive limit of 20%. The facility was discharging at the time of the alarm but ceased discharge upon knowledge of the event. A facility representative admitted that there may have been multiple instances earlier in the week where the lower explosive limit (LEL) exceeded 20%. The fire department was notified as part of the CGMS policy requirement.

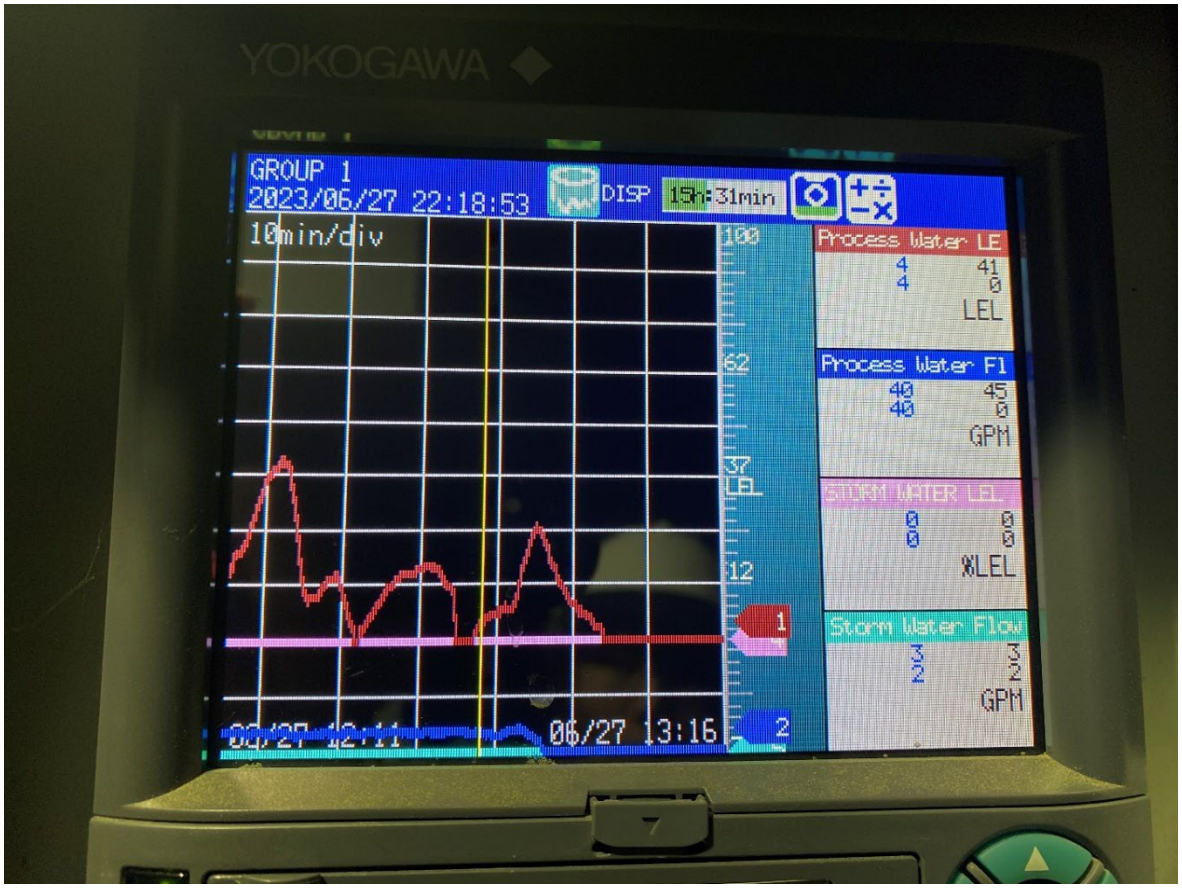


Figure 18. Equilon Enterprise LLC dba Shell Oil Products monitoring equipment. Trend indicates LEL exceedance prior to wastewater impoundment and notification. Trend timespan is June 27, 2023, 133-1243 hour.

The cause of the exceedance is still under investigation. An onsite facility representative speculated that the elevated LEL was caused by overdrawing pretreatment system wastewater. Inspection staff noted numerous instances of LEL exceeding 20%. This facility received an abnormally high volume of wastewater hauled from other Shell facilities this year due to the unprecedented amount of rainfall this year, which may have led to processing wastewater at a higher rate. The facility notified LACSD as required by the CGMS Policy and immediately impounded upon knowledge of LEL exceedance. A follow-up conversation with JWPCP Primary Operations yielded that JWPCP was unaffected by the exceedance.

INDUSTRIAL WASTE SECTION
SUMMARY OF ACTIVITIES
FOR THE MONTH OF JULY 2023

TREATMENT PLANT/SEWER/OTHER INCIDENT INVESTIGATIONS

Grease Accumulation in Districts Siphons

On Friday, July 14, 2023, at 1120 hours, the Industrial Waste Section received an email from the Wastewater Collection System (WCS) Section requesting assistance in reducing grease accumulation in four (4) Districts siphons.

1. Grease in the East Artesia Trunk Siphon

The East Artesia Sections 1,2,3 & 5 21" VCP siphon located between manholes 19 0080 and 19 0081 in Hawaiian Gardens has been experiencing heavy greasing requiring frequent cleaning. The preliminary investigation did not reveal a point source of the grease but determined the cause is likely from an aggregate of residential and commercial food service establishments (FSEs) along Pioneer Blvd. Industrial Waste will work in cooperation with the Los Angeles County Department of Public Works, which has local jurisdiction over the fats, oils, and grease (FOG) control program for FSEs in the city, to control the amount of grease accumulating in the siphon.

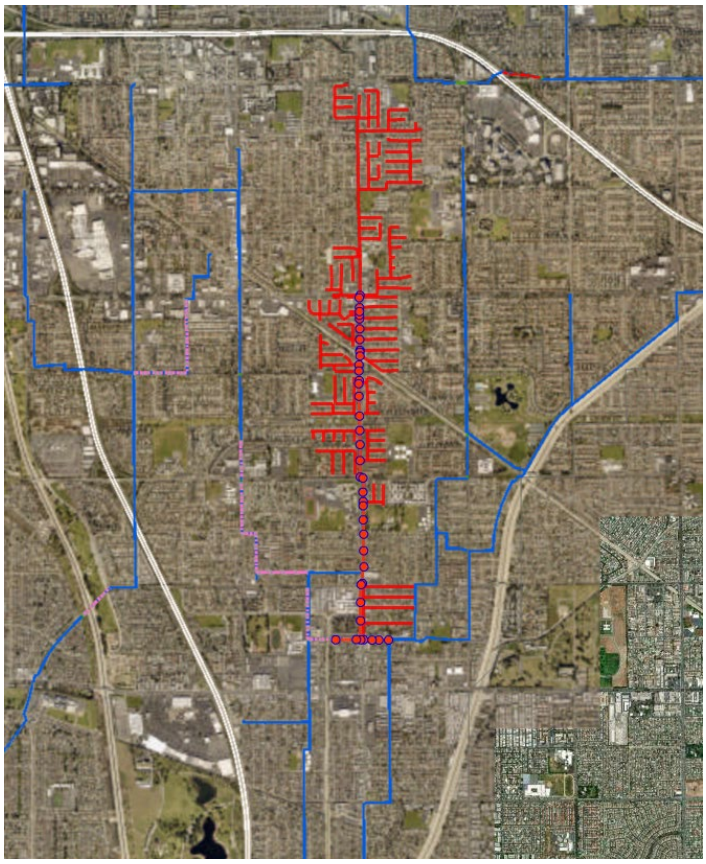


Figure 1. GIS map of the tributary area upstream of manhole 19 0081

2. Grease in Wadsworth Avenue-Long Street Trunk Replacement Siphon

The Wadsworth Avenue-Long Street Trunk Replacement 12” VCP siphon located between manholes 01 1430 and 01 1429 in Los Angeles has been experiencing heavy greasing requiring frequent cleaning. The preliminary investigation did not reveal a point source of the grease but determined the likely cause is from domestic sources and a few FSEs. Industrial Waste will work in cooperation with the City of Los Angeles, which has local jurisdiction over the FOG control program for FSEs in the city, to control the amount of grease accumulating in the siphon.

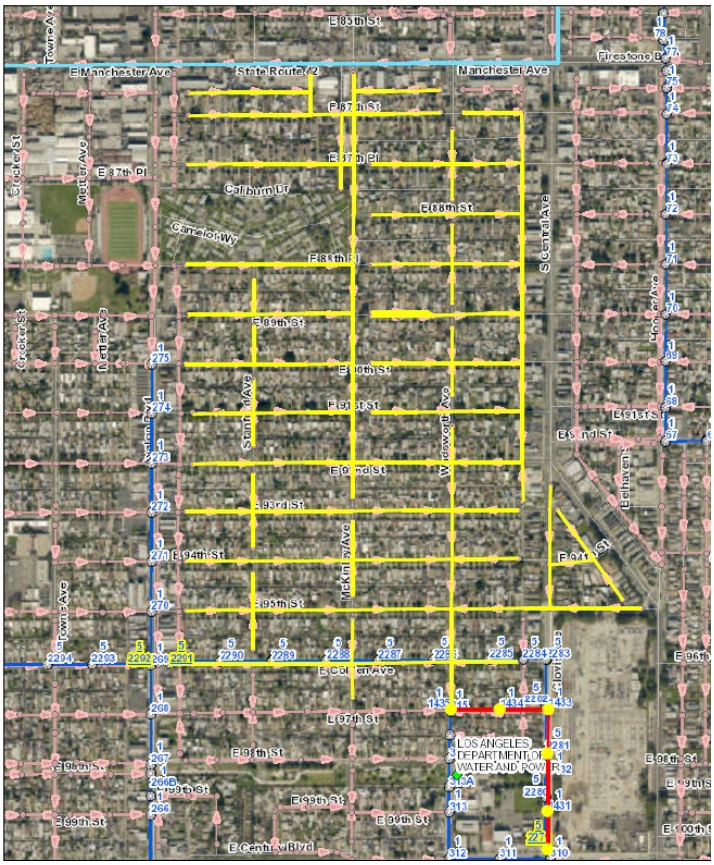


Figure 2. GIS map of the tributary area upstream of manhole 01 1430.

3. MH 20230714 Puente Trunk Siphon Grease

The Puente Trunk siphon between manholes MH 15-0043 to MH 15-0040 (2-18”) located at the intersection of Proctor Ave and the Puente Creek has been experiencing heavy greasing requiring frequent cleaning. Industrial Waste Inspectors identified seven (7) Industrial Waste permitted facilities having the potential to contribute to the FOG problem at this siphon. These facilities were inspected and found to be in compliance with pretreatment requirements, and all waste manifests documented regular hauling of clarifier grease for offsite disposal. Nevertheless, one of these facilities, Evans Food Group, LTD (IW#22180), has a history of contributing excessive FOG into the collection system. Evans was investigated multiple times for sewer grease. The most recent incident was in January 2022, for a Partial Blockage in Puente Trunk Line.

IW Inspectors will continue to monitor and sample Evans Food Group for compliance. In addition to the I.W. permitted dischargers, this siphon receives wastewater from an aggregate of residential and commercial food service establishments (FSEs) in the area. Industrial Waste will work in cooperation with the local jurisdiction regarding the fats, oils, and grease (FOG) control program for FSEs in the city.

Figure 3. Tributary Area of Siphon at MH 15-0043 to MH 15-0040

4. MH 20230714 Arroyo-Seco Trunk Section 3 Grease

The Arroyo-Seco Trunk Section 3 Trunk siphon between manholes MH 16-0191 and MH 16-0192 located at the intersection of Clark Place and Stratford Lane has been experiencing heavy greasing requiring frequent cleaning. Industrial Waste Inspectors identified four (4) Industrial Waste permitted facilities immediately tributary to this siphon. These facilities (a linen launderer, hospital, power plant, and a food manufacturer) were inspected and found to be in compliance with pretreatment requirements, and manifests at the food manufacturer documented regular hauling of clarifier grease for offsite disposal. Moreover, there was no evidence that any of the subject industries had recently or consistently been discharging excessive amounts of grease. In addition to the I.W. permitted dischargers, this siphon receives wastewater from an aggregate of residential and commercial food service establishments (FSEs) in the area. The preliminary investigation did not reveal a point source of the grease, but Industrial Waste will work in cooperation with the city of Pasadena regarding the fats, oils, and grease (FOG) control program for FSEs in the city.

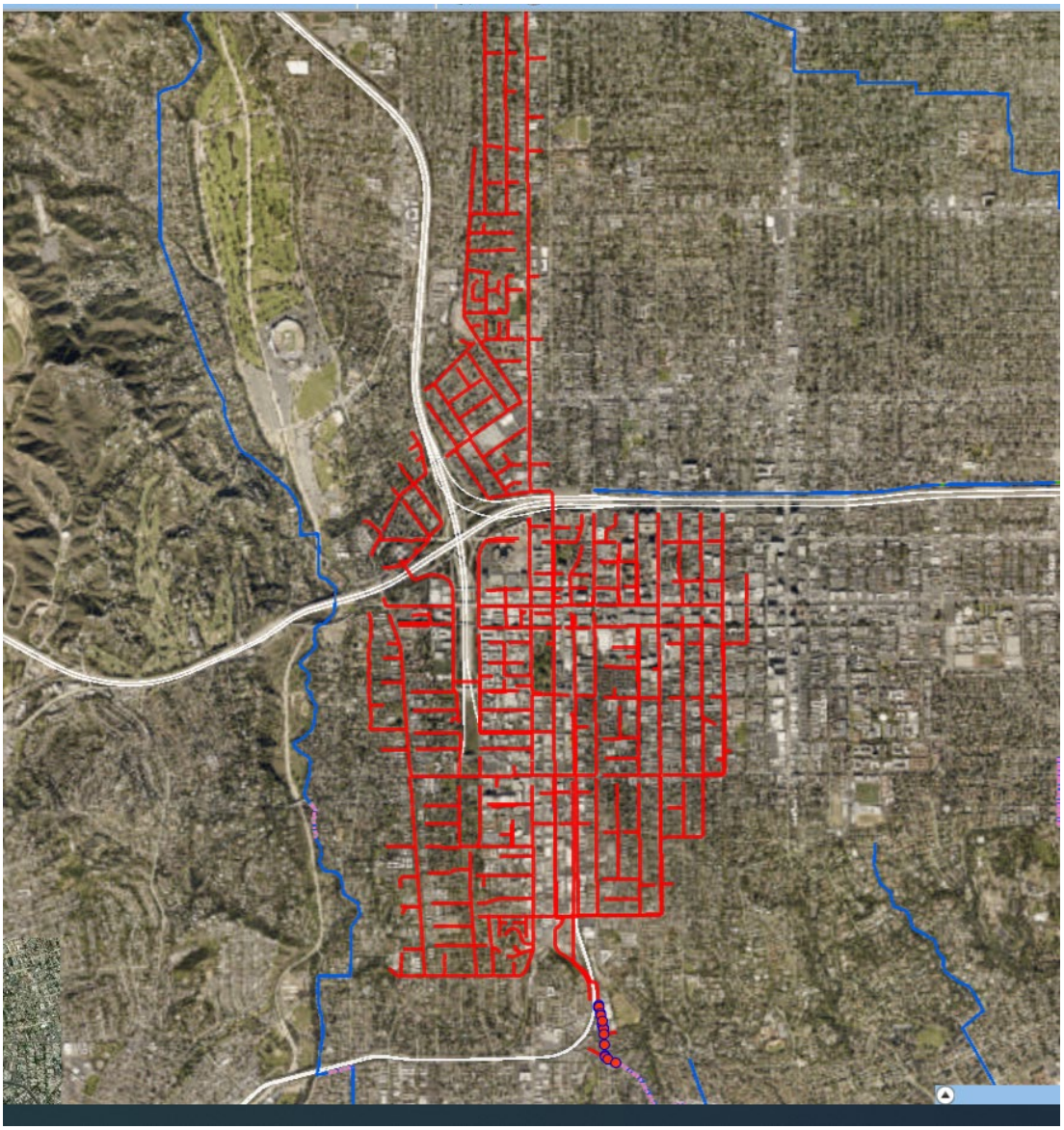


Figure 4. Tributary Area for MH 16 0192

Foul Odor in Carson

On Saturday, July 15, 2023, at 1817 hours, the Industrial Waste Section received an email from Wastewater Collections Systems (WCS) reporting an odor complaint from a resident at 21208 Lynton Avenue, Carson. A Districts swing shift pumping plant operator, who was dispatched to the location, confirmed a strong odor at the nearby manhole 08 0718, and eliminated the odor by sealing the manhole. Industrial waste inspectors responded on the following Monday performing inspections at a centralized waste treatment facility, a fuel terminal, an oil production facility, and a cold storage facility, which have the potential for discharging highly odorous waste and were all in operation on Saturday, but no irregularities were observed. In addition, the local sewers and the nearby commercial plaza were inspected but no unusual odors were detected. It is unclear what the nature of the odor was, or where it originated, but industrial waste inspectors will remain vigilant for odorous discharges upstream of the 216th Street Replacement Trunk.

Figure 5. GIS map of the residence complaint and manhole 08 0718 on the 216th Street Replacement Trunk.

Figure 6. GIS map of the tributary area upstream of manhole 08 0718.

Whittier Narrows WRP Low Dissolved Oxygen in Aeration Tanks 7/18,7/22, and 7/31

During the month of July 2023, Whittier Narrows WRP Operations reported a total of three low-dissolved oxygen incidents to the Industrial Waste Inspection staff. The reported incidents were the following:

1. On Tuesday, July 18, 2023, at 0912 hours, Whittier Narrows WRP Operations called the Industrial Waste Inspection staff to report the WRP was experiencing sharply declining dissolved oxygen concentrations in the aeration units to a point below the 1.0 mg/L alarm. The dissolved oxygen concentrations declining to a base of 0.9 mg/L before reversing to normal concentrations. The incident began at approximately 0800 hours and was ongoing when the IW inspectors arrived at WNWRP at 0935 hours. It was also indicated by

operations that a similar incident occurred on Monday, July 17, 2023, at approximately the same time. Low D.O. conditions contributed to a slightly higher ammonia concentration in the secondary effluent. There were no other operational anomalies (pH, Color, Odor, turbidity, etc.) reported by WRP staff for this incident.

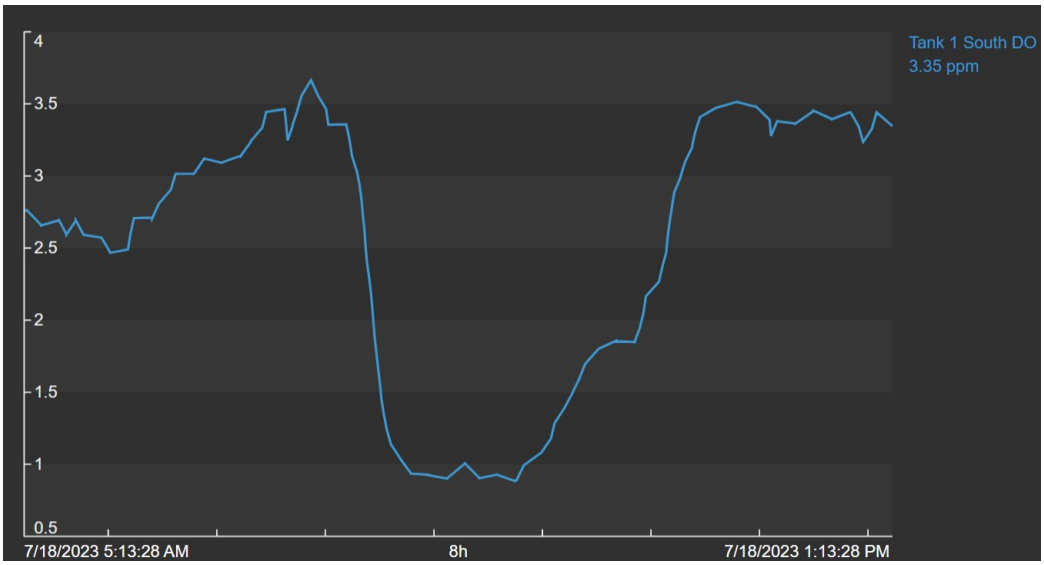


Figure 7. OSI PI Graph Low DO 07-18-23

The IW Inspectors collected raw and primary-effluent grab samples during the incident and requested rush COD analysis for both samples. Laboratory analysis revealed Raw COD = 654 mg/L and Primary effluent COD = 320 mg/L: both within normal values. Despite these results, IW Inspectors conducted investigatory inspections at industrial facilities located upstream of the WNWRP. Inspections found no evidence of any unusual discharges that might be contributory to the low dissolved oxygen incident at the WRP.

2. On Saturday, July 22, 2023, at 1000 hours, Whittier Narrows WRP Operations called the Industrial Waste Inspection staff again to report sharply declining dissolved-oxygen concentrations in the aeration units to a point below the 1.0 mg/L alarm, which declined to a base of 0.9 mg/L in South Aeration Unit 1. Operations stated that the dissolved-oxygen concentrations began declining at approximately 0850 hours and lasted until approximately 1100 hours. There were no other operational anomalies (pH, Color, Odor, turbidity, etc.) reported by WRP staff for this incident. No samples were taken during this incident.

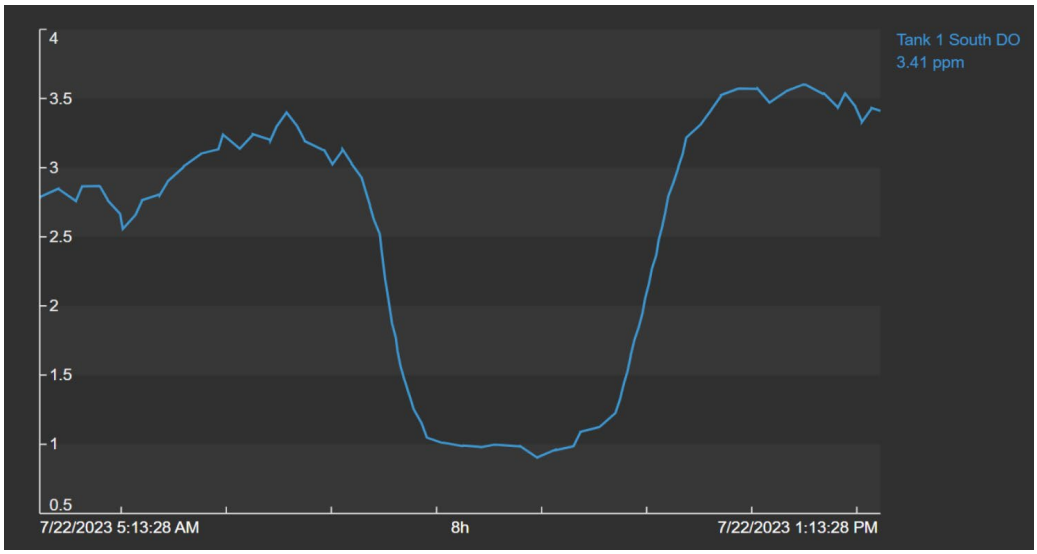


Figure 8. OSI PI Graph Low DO 07-22-23

IW Inspection staff responded immediately by conducting Saturday inspections of high-COD dischargers upstream of WNWRP known to be operating on weekends. There was no evidence of any unusual discharges or non-compliant activity that might have caused the D.O. drop at the WRP.

3. On Monday July 31, 2023, at 0945 hours, Whittier Narrows WRP Operations called the Industrial Waste Inspection staff to report sharply declining dissolved-oxygen concentrations in the aeration units to a point at the 1.0 mg/L alarm. There were no other operational anomalies (pH, Color, Odor, turbidity, etc.) reported by WRP staff for this incident.

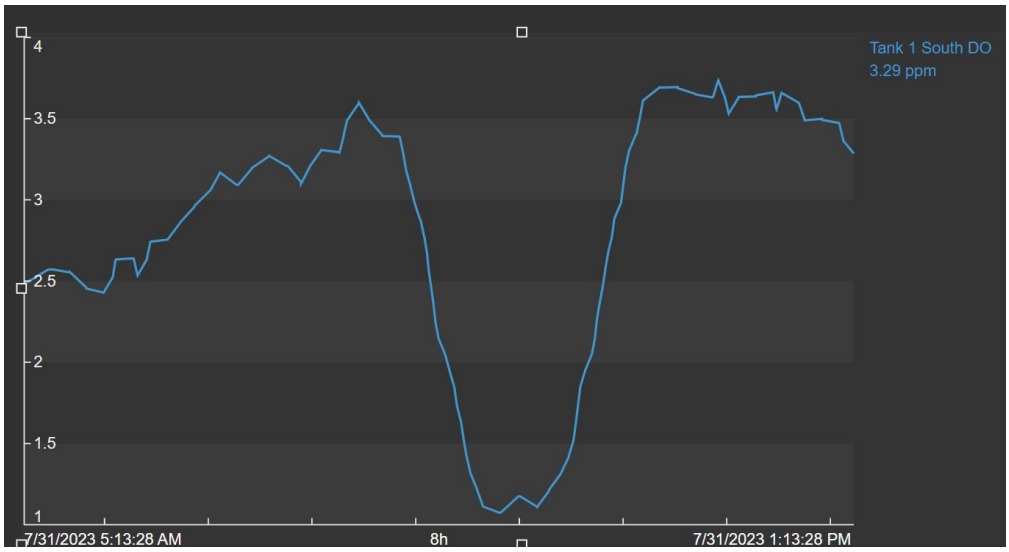


Figure 9. OSI PI Graph Low DO 07-31-23

The IW Inspectors collected raw and primary-effluent grab samples during the incident and requested rush COD and Oil & Grease analysis for both samples. Laboratory analysis revealed Raw COD = 519mg/l, oil & grease = 58.6mg/l and Primary COD = 249mg/l, oil & grease= 27.7mg/l. These analyses are within normal values for WNWRP. IW Inspectors conducted investigatory inspections and found no evidence of any unusual discharges.

Investigative inspections in response to these long term, intermittent incidents have not returned any definitive industrial source. Incident grab sampling efforts have not identified a specific chemical risk to the plant during these incidents. To date, incident grab samples for COD have all been within normal ranges. To confirm the plant is in fact receiving high COD slug materials, Industrial Waste has arranged for a 24-hour automated sampler taking hourly discrete samples of the WNWRP Primary Effluent. If the plant is experiencing a low dissolved oxygen event, the SJC lab staff will test corresponding primary-effluent sample bottles for COD to capture the event as it is occurring. Inspection staff will remain ready to respond to future incidents of low dissolved oxygen if needed.

SUMMARY OF ACTIVITIES
FOR THE MONTH OF AUGUST 2023
TREATMENT PLANT/SEWER/OTHER INCIDENT INVESTIGATIONS

Whittier Narrows WRP Low DO Aeration Tanks

Whittier Narrows WRP experienced several adverse oxygen demand events in secondary treatment during August 2023. Operations reported to the Industrial Waste Section low DO conditions on Monday, August 7, Wednesday, August 9, Thursday, August 10, Friday, August 11, Saturday, August 12, and Monday, August 28, 2023. During each of these events, there were no reported unusual pH, color, odor, or foaming concurrent with the low DO, Industrial Waste Inspectors investigated several tributary industrial dischargers having risk factors for generating significant COD wastewater. None were found having wastewater discharges or operational anomalies that could be associated to the reported low DO events. Furthermore, the WNWRP tributary area was canvassed for unpermitted dischargers to identify dischargers having an unaccounted-for organic load into the plant. Several unpermitted industrial users were investigated, but no evidence was observed regarding any illicit discharges into WNWRP. Lastly, the De Garmo stop log was inspected and found to be positioned to direct all flow from JOB Unit 8A at MH 1046 into the SJC WRP Interceptor and closed for flow into WNWRP. Therefore, it is unlikely a change in flow or strength is occurring due to a faulty flow control device.

In response to the chronic, adverse oxygen demand at WNWRP, the Industrial Waste Section requested a 24-hour, hourly-discrete sampler at the primary effluent channel in effort to isolate and identify wastewater quality immediate to these incidents. In the event of an incident, hourly samples that correspond to the incident would be analyzed for COD. This sampling project began on August 07, 2023, and continued through August 24, 2023. During the events on Monday August 7, Wednesday, August 9, Thursday August 10, Friday, August 11, and Saturday, August 12, 2023, hourly samples were collected and submitted for COD analysis, which included bottles before during and after the timeframe of each low DO event. Analytical COD results from the project hourly sampler, as well as the grab samples obtained by operations staff during events, revealed all primary effluent COD values were within the normal COD ranges before, during and after the low DO events.

Ultimately, inspections conducted in response to these incidents found no evidence of any illicit or high strength discharges from the permitted facilities of concern that could have caused the incidents at WNWRP. Operations staff also stated no NPDES discharge violations occurred nor were there any other detrimental plant effects noted or complained of during any of the reported low DO events. Inspection staff will continue to perform field inspections to search for possible new industrial users and to ensure the existing permitted users are complying with their permit requirements.

JWPCP Solids

On Tuesday, August 8, 2023, at 0715 hours, the Industrial Waste Section received a call from JWPCP Operations reporting an excessive amount of grey gel-like material at the J.O. “A” inlet to the headworks. In addition, thick brown sludge was noted on the bar rakes. Industrial Waste Inspectors were able to identify the source of the brown sludge to a 6066-gallon load of food waste from the Puente Hills Materials Recovery Facility. The subject load was received at the liquid waste disposal station (LWDS) about 45 minutes prior to the incident call based on a comparison with a sample left at the LWDS which had the same color, odor, and texture. The grey gel-like material appeared consistent with discharges from the centrate treatment system

which connects to the headworks through the J.O. “A” sewer. There were no reported negative impacts to the rest of the plant.

Figure 19. Food waste collected on the J.O. “A” inlet bar rakes.

JWPCP Elevated Explosivity in the Secondary Reactors - August 12, 2023 & August 19, 2023

On Saturday, August 12, 2023, at 0704 hours, JWPCP Operations left a voicemail message for the Industrial Waste Inspection Staff reporting elevated combustible gases at the secondary reactors. Operations reported headspace gases in Reactor D were purged the previous night at 2100 hours and again at 0116 hours Sunday, August 12, and at 0600 hours. Operations obtained a grab sample during the event, which was characterized as having the appearance of shoe polish.

Industrial Waste Inspectors immediately began an investigation of six tributary petroleum refineries. I.W. Inspectors reviewed a range of relevant materials, including operator's logs, effluent monitoring charts, and collected samples. Of the six refineries, Phillips 66 experienced undesirable wastewater quality resulting in impoundment due to poor water quality, and the resumption of discharge coincided with the elevated LEL readings at JWPCP. Furthermore, wastewater samples taken from the refinery’s sampling carousel that corresponded to the incident timeframe revealed excessive oil & grease content.

Evidence strongly supports the notion that Phillips 66 is likely the source of the elevated LEL readings at the JO-A Inlet and the subsequent purging of Reactor D. The operator’s logbook, which documents water quality issues, strongly implies that Phillips 66 was encountering challenges with their pretreatment processes and might have been falling

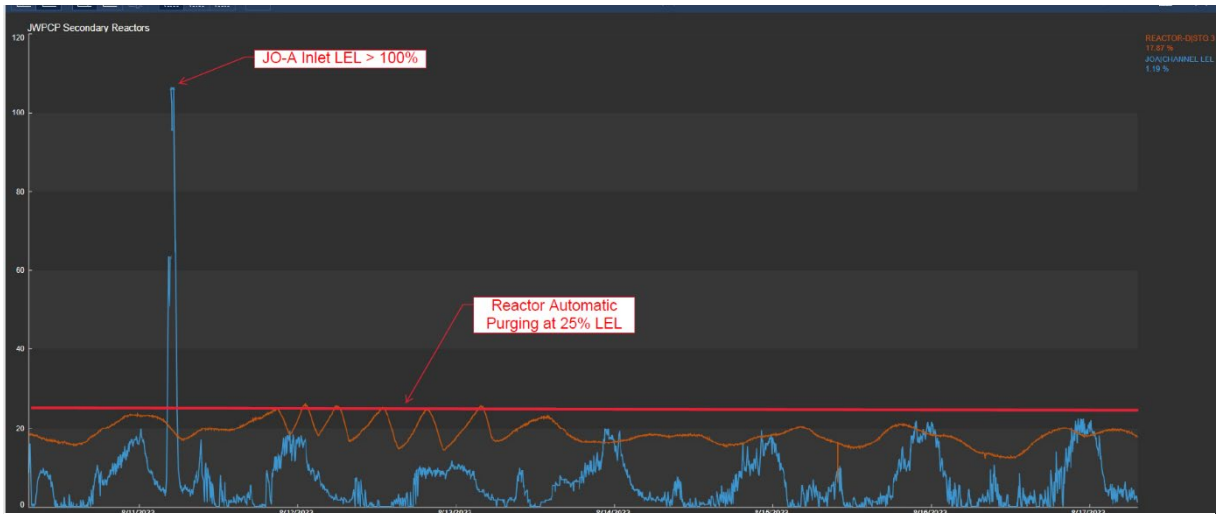


Figure 20. PI Vision chart displaying J.O. “A” Inlet and Reactor D combustible gas levels the week of August 11,

short of meeting permit restrictions. The chronological correlation between the occurrences of excessive oil and grease levels and the persistent elevated LEL at JWPCP's Reactor D, further reinforces this concept, particularly since the sample results indicated a violation of permit limits.

Figure 3. Oily samples collected from the Phillips 66 Refinery's effluent sampler on August 12, 2023.

On Saturday, August 19, 2023, at 0247 hours, JWPCP Operations called the Industrial Waste Section to report elevated combustible gases and a diesel odor at the plant. High combustible gas readings and odors were initially detected at JO"A" inlet to the headworks. Operations expected the rising LEL in the secondary reactors would necessitate purging.

Industrial Waste Inspectors immediately began an investigation of four petroleum refineries tributary to JO "A". Of the four refineries investigated, Phillips 66 demonstrated evidence of abnormal wastewater quality resulting in wastewater impoundment during the incident timeframe. I.W. Inspectors collected samples from the refinery's carousel, which had visible excessive oil and a strong fuel odor. Laboratory analysis revealed samples collected from sampler bottles taken at 03:00 hours and 05:00 hours on August 19, demonstrated excessive oil content in exceedance of permit limits. Evidence strongly supports the notion that Phillips 66 is likely the source of the elevated LEL readings at the JO-A Inlet and the subsequent purging of Reactors C, D, E, F, and G. A compliance meeting will be scheduled with Phillips 66 to ensure future operations result in their discharge requirements being met.

Figure 4. PI Vision chart displaying J.O. " A" Inlet and Reactor combustible gas levels on August 19, 2023.

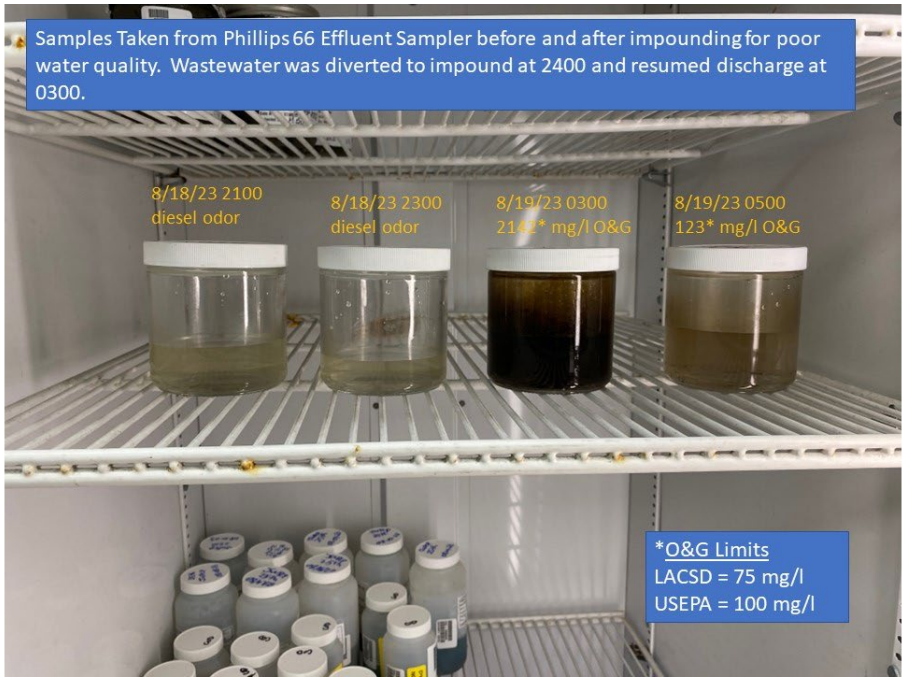


Figure 5. Samples Taken from Phillips 66 Effluent Sampler August 19, 2023.

City of Cerritos Pumping Plant Foam

On Monday, August 21, 2023, at 1545 hours, the City of Cerritos contacted the IW Section requesting assistance in identifying and controlling foam that was impacting the ultrasonic level sensors in a city pumping plant located on the northeast corner of Marquardt Avenue and Bettencourt Street in the City of Cerritos. An

investigation of the upstream sewer found that DRJ Skin Care, a non-permitted detergent manufacturer specializing in skin care products, was generating highly foaming wastewater. To control the foam the company was requested to purchase a defoaming chemical and bleed it into their waste stream. Industrial waste inspectors have started the permit process to issue the company an industrial wastewater permit which will have requirements to control foam.

Figure 6. GIS map showing the City of Cerritos Pumping Plant and the upstream sewer.

SUMMARY OF ACTIVITIES
FOR THE MONTH OF SEPTEMBER 2023
TREATMENT PLANT/SEWER/OTHER INCIDENT INVESTIGATIONS

Los Coyotes WRP Low Dissolved Oxygen in the Aeration Units

On Friday, September 01, 2023, at 0700 hours, LCWRP Operations reported to the Industrial Waste Section of low dissolved oxygen conditions in the aeration units. There were no other adverse impacts (pH, color, turbidity, odor, etc.) reported by operations during this incident. According to operations, dissolved oxygen conditions began to decline at approximately 1600 hours on Thursday, August 31, 2023, and remained below 1.0 mg/L until 0600 hours on September 01, 2023. Operations did not provide incident samples to Industrial Waste.

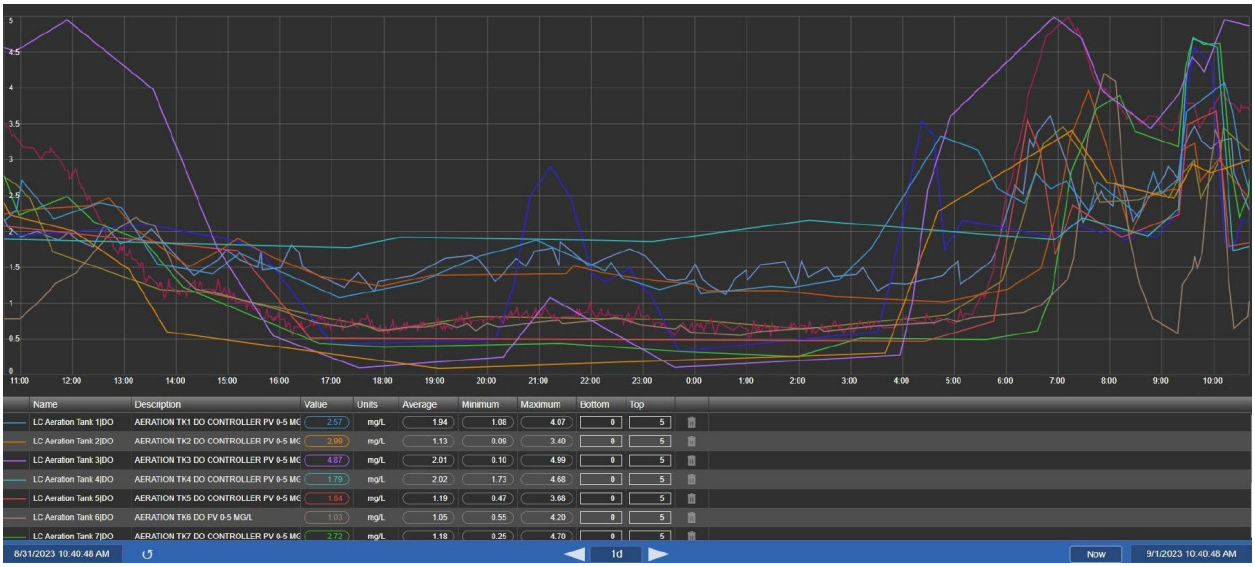


Figure 21. LCWRP DO Trends From 08-31 to 09-01

IW Inspectors from both day and night teams investigated 11 dischargers having significant COD risks to LCWRP. The investigation did not identify a likely source of the incident. All inspected dischargers were operating normally and had no substantiated spills or pretreatment mishaps. Brenntag Pacific, Inc. was found to have a minor, non-incident-related violation. Ultimately, the incident did not materially impact WRP treatment operations or effluent quality. IW inspectors continue to be watchful for excessive organic loading at facilities upstream of the WRP.

Valencia WRP Low Dissolved Oxygen and Elevated Turbidity in the Effluent Filters

On Friday, September 1, 2023, at 0750 hours, Valencia WRP Operations reported to the Industrial Waste Section of low dissolved oxygen conditions in the aeration units followed by elevated effluent turbidity in the effluent filters. Operations stated that the dissolved oxygen concentrations began declining at approximately 1800 hours on August 31, eventually reaching 0.0 mg/L at 2000 hours. Operations responded to the low dissolved conditions by increasing the air compressors to maximum output to counteract the oxygen demand, which began to recover at 0053 hours the next day, September 1. At approximately 0130 hours on September 1, 2023, the effluent filter turbidity climbed to 2.87 NTU, and the turbidity in the UV train was too high and had to be turned off in favor of conventional disinfectant using contact tanks. Operations noted no other adverse impacts regarding color, odor, or pH during the incident. At the time of the notification to the IW Section, the plant had returned to normal operations. Operations collected and provided incident-specific plant samples to IW.

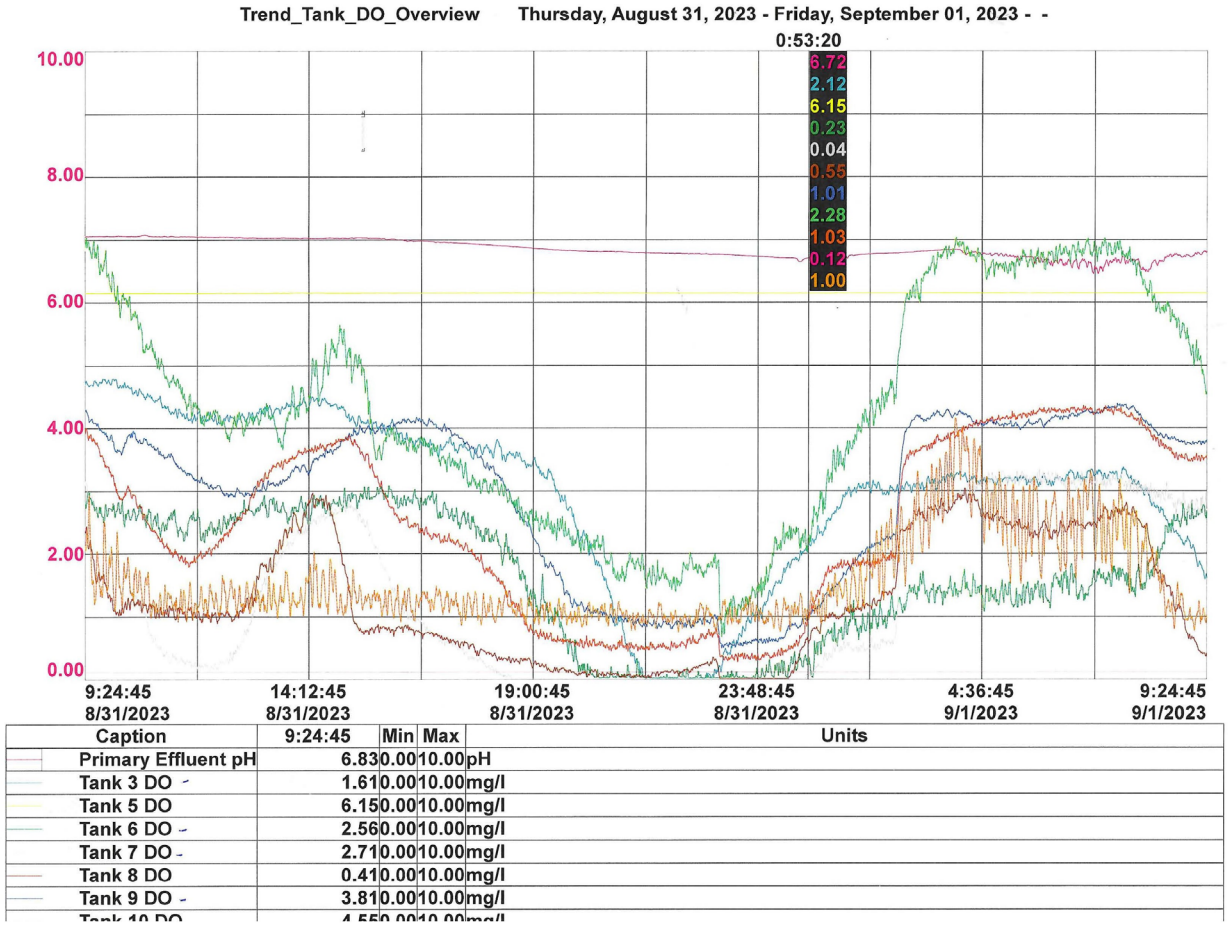


Figure 22. VWRP DO Trends From 08-31 to 09-01

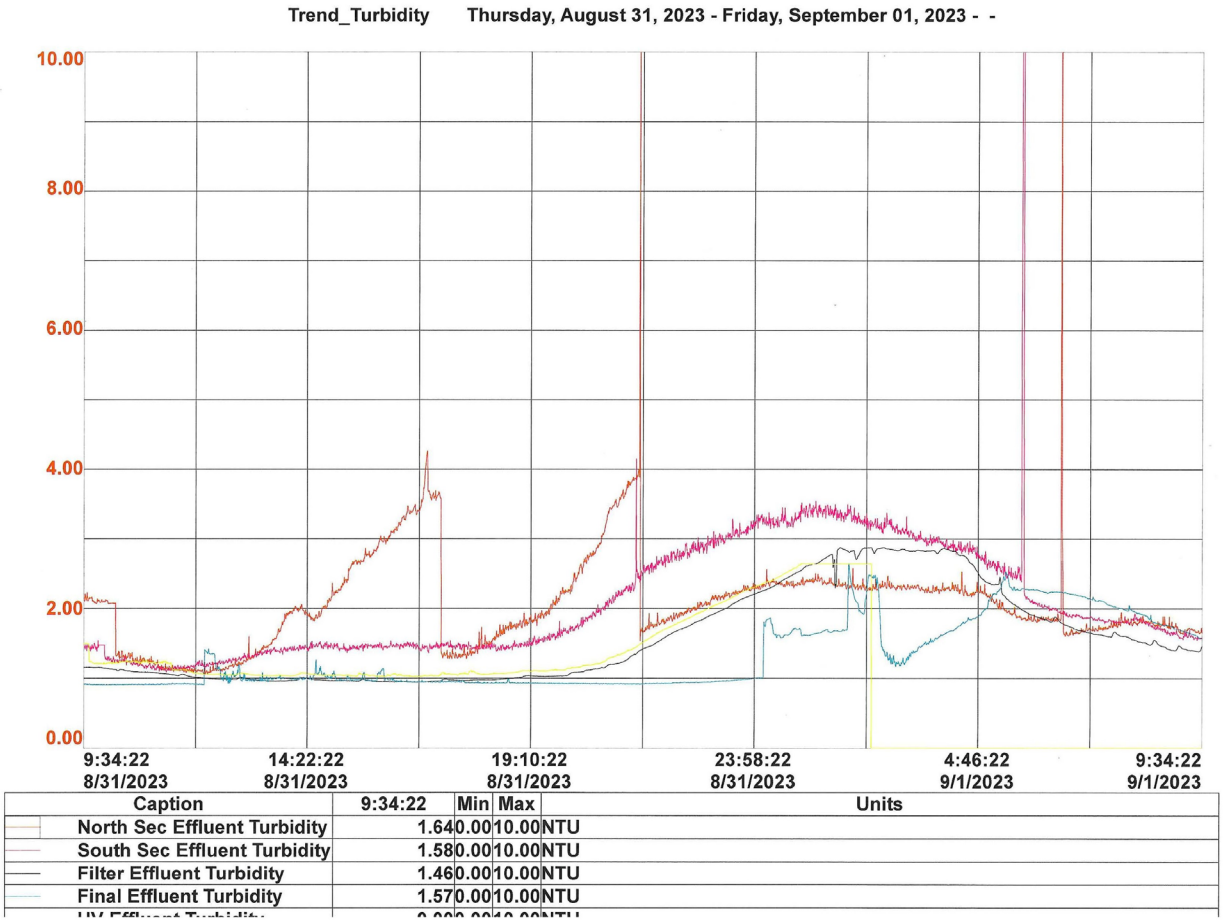


Figure 23. VWRP Turbidity Trends From 08-31 to 09-01

Having the benefit of composite samples taken during the incident window, the Laboratory MSO (monthly summary of operations) report revealed primary, secondary, and tertiary composite samples were elevated for COD and turbidity. The primary effluent COD concentrations were three times higher than normal (1520 mg/L vs 400-500 mg/L). Sample results substantiate the idea that a slug organic load impacted the plant.

Industrial Waste Inspectors investigated 10 permitted dischargers having a significant risk of discharging high COD materials to Valencia WRP. Inspections reveal that DrinkPak, LLC may have contributed to the low DO event. DrinkPak, LLC makes energy drinks and other highly sweetened and caffeinated products. Historical records indicate DrinkPak, LLC routinely discharges high-strength wastewater with recent COD concentrations of 3660 mg/l, 4650 mg/l, and 9060 mg/l. Furthermore, DrinkPak, LLC routinely discharges above their permitted flow rate, as they were during the incident inspection where they were discharging more than two times the permitted flow rate, however their permit has subsequently been renewed and their permitted flow rate has been increased.

Though there was no direct evidence such as a spill or records of a release of off-spec product that would point directly at DrinkPak, LLC at the time of the upset at the Valencia WRP, the high flow rate on September 1, 2023, and evidence of high COD water that has been sampled multiple times in the past 8 months make the company a strong suspect for having caused the high oxygen demand.

Additionally, Pharmavite LLC (FID: 2065802) was issued a notice of violation for violating wastewater ordinance sections 210 and 406C for low pH; however, it is unclear if this was an additional factor in causing the DO drop. Inspection staff will continue to search the growing number of businesses in the tributary area for companies capable of causing low DO conditions at the Valencia WRP.

Whittier Narrows WRP Low Dissolved Oxygen in Aeration Tanks

On Saturday, September 2, 2023, at 0920 hours, Whittier Narrows WRP Operations reported to the Industrial Waste Section of low dissolved oxygen conditions in the secondary aeration tanks. The dissolved oxygen began dropping at 0840 hours and reached a minimum concentration of 0.7 ppm. Operators reported that there was a slight oily sheen in the primary effluent, but nothing unusual with odor, color, or pH. Operations staff increased air to the secondary aeration tanks and the plant was back to normal operations by 1100 hours.

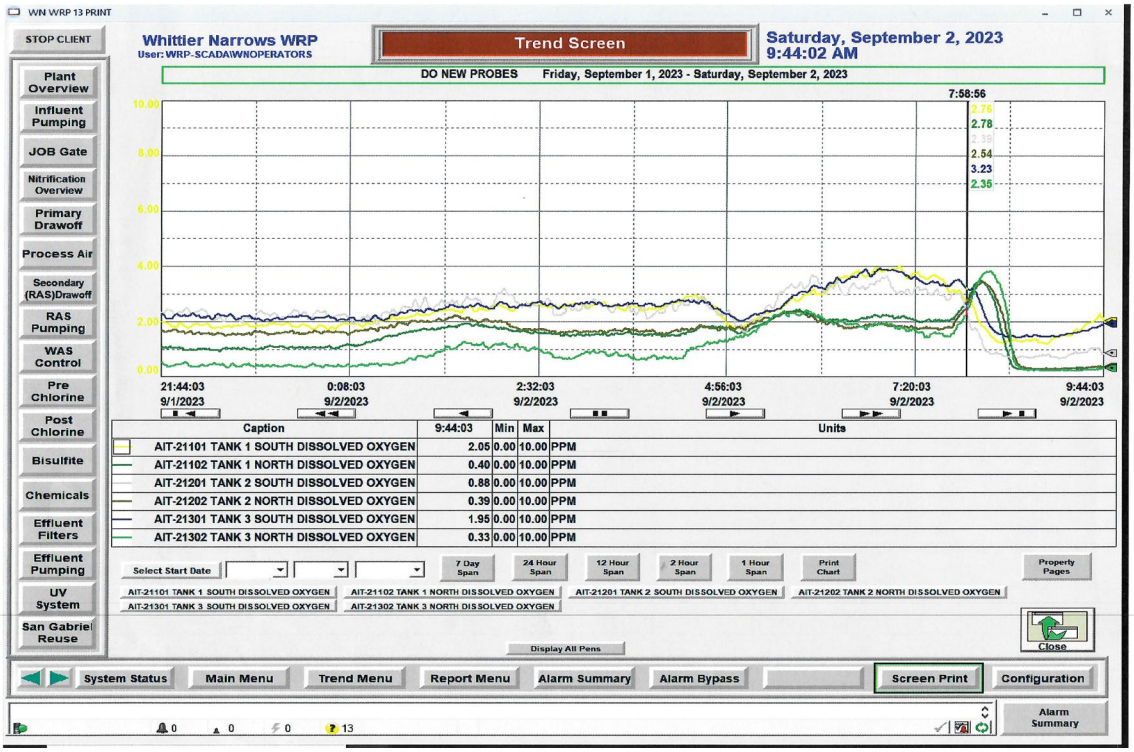


Figure 24. VWRP Turbidity Trends From 09-01 to 09-02

Four permitted facilities with a significant COD risk were inspected in response to the low DO. Of the four facilities, two were determined to have been closed during the incident at the Whittier Narrows WRP. Operations grabbed 2 samples during the incident for IW. The Raw influent grab sample had a preliminary result of 232 mg/L of Chemical Oxygen Demand (COD) and the Primary effluent grab sample had a preliminary result of 129 mg/L COD. Both sample results are lower than the normal range suggesting it was not likely a slug of high-strength wastewater that caused the low DO. Ultimately, Operations increased the air allowing the plant to recover completely, and there were no other issues affecting effluent quality.

JWPCP Black Gelatinous Solids at J.O. 'A' Inlet

On Tuesday, September 5, 2023, at 0015 hours, JWPCP Operations reported to the Industrial Waste Section gelatinous black solids that had accumulated in the J.O.'A' inlet works. Operations collected and provided an incident-specific sample of the black material to IW.

Figure 5. Gelatinous solids from the J.O.'A' Inlet to the headworks

The black gelatinous solids collecting in the J.O.'A' inlet most likely originated from JWPCP Solids and the polymer loading station. The sample had the same appearance and odor as digested sludge mixed with polymer, which was confirmed by the Supervising Treatment Plant Operator. In fact, the material is consistent with past investigations linked to JWPCP Solids. There were indications at the polymer loading station that concentrated polymer had recently been washed into a containment sump which is known to connect to the JWPCP headworks. Since the material likely originated in the treatment plant, no further investigation was conducted.

SUMMARY OF ACTIVITIES
FOR THE MONTH OF OCTOBER 2023
TREATMENT PLANT/SEWER/OTHER INCIDENT INVESTIGATIONS

Ammonia Leak at the Torrance Refining Company

On Tuesday, October 24, 2023, at 1355 hours, Torrance Refinery Company LLC (FID 9249778), a large oil refinery in Torrance, reported to LACSD's Long Beach Main Pump Plant, that the facility had experienced an ammonia leak that subsequently generated fire suppression wastewater. The ammonia leak was observed during the refinery operator's routine inspection. The refinery operator discovered and isolated the source to a seal on one of three ~100lb ammonia tanks used as part of NOX air emission control at their process heaters. In their efforts to control the vapors, water from a fire suppression system was used to knockdown the ammonia vapors resulting in the generation of ammonia laden wastewater. The resultant wastewater was sent through the wastewater treatment system and discharged through the Van Ness Outfall (#21899), which has a permitted flowrate of approximately 3.6 MGD.

IW Inspectors responded and discovered the refinery's effluent-monitoring equipment was operating as required, and wastewater data tracings depicted compliant wastewater quality. There were no instances of high pH values that might indicate excessive concentrations of ammonia. Furthermore, field sampling efforts were also compliant with permit limits. It was determined that the refinery's wastewater effluent met all permit limits and requirements during this incident. The incident had no known impact on Districts' facilities or operations.

Whittier Narrows WRP Low DO Aeration Tanks

On Monday, October 30, 2023, at 1019 hours Whittier Narrows WRP Operations called the Industrial Waste Section to report low-dissolved oxygen conditions in the secondary aeration units. Operations stated that the dissolved-oxygen concentrations began sharply declining at approximately 0900 hours and reached a minimum value of 0.42 ppm at 1048 hours. Dissolved-oxygen concentrations recovered above 1 ppm in all secondary tanks by 1120 hours. There were no reported abnormal odors, color, or foam associated with the event, but Operations noted slightly elevated grease at the end of the primary channel. Plant operators obtained raw influent grab samples at 0950 hours and primary effluent grab samples at 0953 hours. IW Inspectors received the samples, which were subsequently submitted to the SJC water quality laboratory for total COD analysis.

Figure 25. OSI PI Graph WNWRP D.O. at Aeration Units Oct. 30, 2023

Despite extensive efforts by IW inspectors to determine a source for these incidents, no definitive source has yet been identified. IW Inspectors immediately responded to the call and investigated three significant dischargers tributary to WNWRP. These inspections revealed no wastewater data or observations associating discharges from those facilities as the source of the incident. The WRP Laboratory collected a weekly "Primary Effluent" composite sample on the day of the incident (October 30, 2023), which had a normal range result of 394 mg/l. The low dissolved-oxygen incident did not cause an NPDES violation.

IW Inspectors have developed an extensive effort to try to locate and identify the source(s) of these incidents and the investigation remains ongoing. In effort to better characterize the issue causing intermittent low dissolved-oxygen conditions at WNWRP, IW inspection staff requested further primary effluent C.O.D. sampling by CSD lab personnel using an existing ISCO sampler at WNWRP. The ISCO sampler was programmed to collect 24 discrete bottles every day from August 07, 2023, through August 24, 2023. Multiple low D.O. incidents were reported during this sampling period, but all sampling results for primary effluent C.O.D. were within WNWRP normal ranges, before, during, and after each incident. The profile of the C.O.D. concentrations during these incidents failed to verify that the wastewater causing these incidents is in fact high organic strength. Nevertheless, the IW Inspection staff will continue to monitor the upstream industrial users to ensure they remain in compliance with permit requirements.

Sand Release into Local Sewer by Owens Corning in Compton

On Tuesday, October 24, 2023, at 1236 hours, the Industrial Waste Section received a call from the Street Superintendent for the City of Compton Public Works reporting that a city contractor removed 10 cubic yards of sand from the 8" local sewer downstream of Owens Corning (FID 2065373, IW 5977 and IW 12609). This Owens Corning facility is located at 1501 Tamarind Avenue in the city of Compton and uses sand in the manufacturing of asphalt roof shingles. The subject 8" local sewer line connects to the Districts' Bullis Road - Temple Street Relief Trunk at manhole 01 0378, approximately 1,000 feet downstream of the facility's point of connection.

Figure 2. GIS map of the local sewer downstream of Owens Corning

Figure 3. Sand removal equipment at Owens Corning

Figure 4. Sand in the collection pit at Owens Corning.

In an effort to prevent sewer backups and surcharging in the local sewer, the city has increased its maintenance on the affected reach. Although no sewer system overflows were caused by this sand release, the city of Compton may pursue cost recovery for the increased maintenance expense. In response to the excessive sand loading in the local sewer, Industrial-waste Inspectors issued a Notice-of-Violation to the company for violating two sections of the *Wastewater Ordinance*: Section 309 for causing increased maintenance in the local sewer, and Section 412 for not adequately maintaining their pretreatment equipment. There was no adverse impact to the Districts' sewers from this sand release.

INDUSTRIAL WASTE SECTION
SUMMARY OF ACTIVITIES
FOR THE MONTH OF NOVEMBER 2023

TREATMENT PLANT/SEWER/OTHER INCIDENT INVESTIGATIONS

Low Dissolved Oxygen at Whittier Narrows WRP Aeration Units

Whittier Narrows WRP experienced three, low dissolved-oxygen incidents in November. On Thursday, November 2, 2023, at 0912 hours, Whittier Narrows WRP Operations called the Industrial Waste Section to report low dissolved-oxygen (DO) concentrations in the aeration units. Operations reported that the DO began declining at approximately 0845 hours and reached a minimum of 0.31 ppm at 1004 hours. It was noted that all other parameters were normal such as odor, color, and pH. Operations provided IW Inspectors grab samples of primary effluent taken at 0925 hours and raw influent at 0920 hours. The samples were submitted to SJC water quality laboratory for total COD analysis.

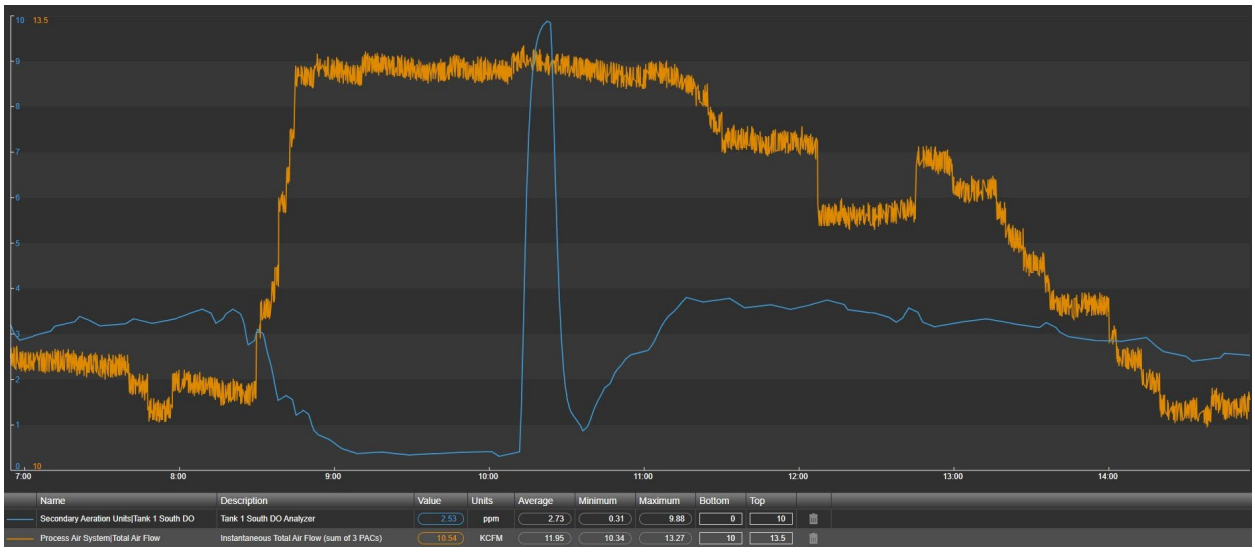


Figure 26. WNWRP Aeration Unit 1 DO and Total Air Flow November 2, 2023

On Friday, November 3, 2023, at 0933 hours Operations called the IW Inspection staff to report another low dissolved-oxygen (DO) event in the secondary aeration tanks at WNWRP. The DO began dropping around 0900 hours and reached a minimum value of 0.31 ppm in tank 1 at 0925 hours. Operations reported that there were no abnormal odors, color, foam, or excessive grease associated with the event, and the influent pH remained within normal parameters. Plant operators obtained samples of the primary effluent at 0925 hours and the raw influent at 0920 hours. The samples were submitted to SJC water quality laboratory under routine priority for total COD analysis.

All raw influent and primary effluent COD analysis results indicated normal COD range wastewater in the plant during these incidents. These COD results were like the more extensive 24-hour composite sampling

during August 2023 low DO incidents at WNWRP, which revealed normal primary effluent COD concentrations before, during and after low aeration DO incidents.
Nevertheless, IW inspectors investigated facilities that have a potential of discharging high COD wastewater to the plant but found nothing that could explain the period of low DO in the secondary aeration units. Thus far, the DO drop offs have not resulted in any impact to final effluent quality at the WRP.

On Monday, November 20, 2023, the IW Section received a third call from WNWRP Operations reporting low DO concentrations in the aeration units that occurred on Saturday, November 18, 2023. The DO began dropping sharply around 0900 hours and reached a minimum value of 0.24 ppm at 1055 hours. The DO recovered above 1 ppm in all tanks by 1118 hours. Operations staff reported that there were no abnormal odors, color, or foam associated with the event, and influent pH remained within normal parameters. Operations mentioned unusual grease loading in primary treatment prior to the low DO event. Plant operators took raw influent and primary effluent grab samples at 0950 hours and 0953 hours, respectively. The samples were submitted to SJC water quality laboratory for total COD analysis.

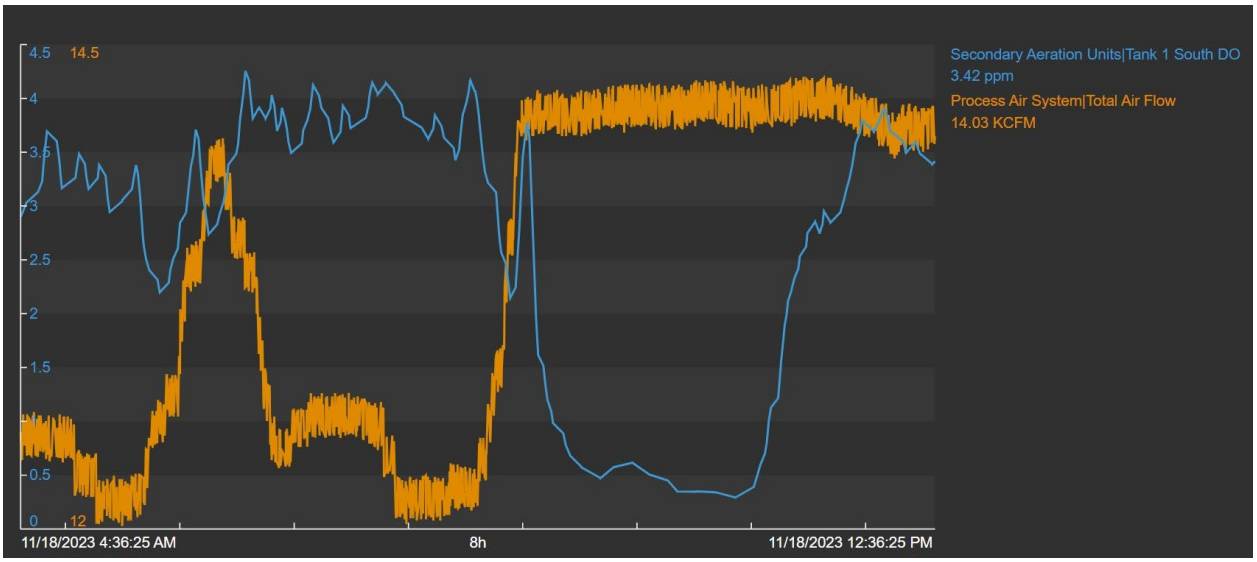


Figure 27. WNWRP Aeration Unit 1 DO and Total Air Flow November 18, 2023

Again, sample results did not indicate high COD wastewater impacting the plant during this incident. However, the IW Inspection staff will continue to monitor plant operations and inspect tributary industrial dischargers that have a potential to discharge high-strength wastewater. The low DO condition did not adversely impact the final effluent quality at the WRP.

Odor Complaints in Carson

On Wednesday, November 29, 2023, the Industrial Waste Section received a voicemail message from a South Coast Air Quality Management District (AQMD) inspector reporting a series of odor complaints in northeast Carson. There was a total of seven citizen odor complaints on Wednesday, November 22, 2023, described as sewer-type and chemical-type over a broad area from Carson Street and Figueroa Street in the south to Alondra Boulevard and Avalon Boulevard in the north upstream and downstream of the Main Street Pumping Plant. As part of the response, AQMD worked with the Los Angeles County Department of Public Works to address local sewer odor complaints downstream of Avalon Tank Cleaning also known as Chemtrans (IW 12874, FID 1947894) located at 14700 South Avalon Boulevard, Gardena, a centralized waste treatment facility permitted to treat and discharge organic wastewater containing landfill leachate and metal-bearing wastewater, as well as wastewater generated from non-hazardous tanker truck cleaning. This information was forwarded to the Wastewater Collection Systems Section and industrial waste inspectors followed up at Chemtrans to determine the nature of business on November 22nd.

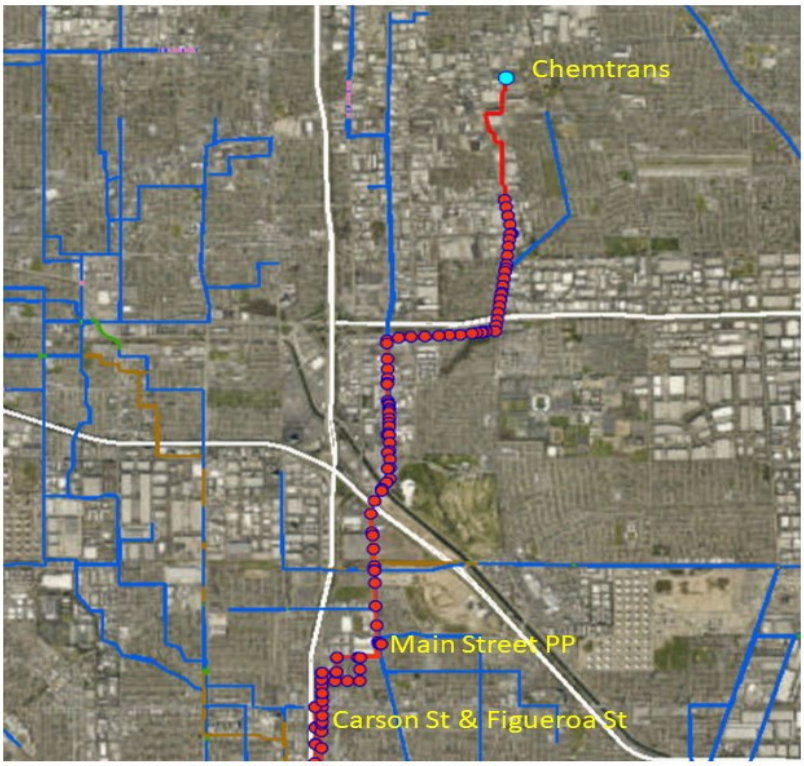


Figure 3. GIS map of the local and Districts' sewer downstream of Chemtrans

Industrial waste inspectors inspected Chemtrans but did not find anything to connect the facility with the series of odor complaints on November 22nd. All the records on-site, including the flow chart, granular activated carbon service log, intake log, and treatment log were reviewed but nothing unusual was found. It is unclear what caused the series of odor complaints on the 22nd, but industrial waste inspectors will continue to monitor Chemtrans closely due to their history of causing strong odors in the local sewer.

Grease in the Warren Facility Headworks

On Thursday, November 30, 2023, at 1445 hours, a supervising treatment plant operator at the Warren Facility contacted the Industrial Waste Section requesting an investigation into the source of grease fouling the headworks. Samples were collected by Operations from each of the three inlets at 1000 hours in the morning and were used to compare with possible sources and to determine which inlet to investigate.

Figure 4. Samples collected from the JO-A inlet and a load of food waste at the Carson liquid waste disposal station.

The sample taken at the JO-A inlet on November 30, 2023, at 1000

hours indicated that the treatment plant experienced excessive grease loading. An inspection at the Phillips 66 Refinery, the largest discharger upstream of JO-A, revealed no evidence of off-spec discharge. Reviewing the food waste log revealed that 5460 gallons of food waste were discharged during the timeframe in question (1000 hours). The sample provided by JC'S Grease and the one taken by Operations at the JO-A inlet shows some similarity. The material noticed in the JO-A inlet was likely from a combination of the food waste discharged to the liquid waste disposal station combined with centrate treatment wastewater and the Thursday drawdown of JO-A and JO-D.

SUMMARY OF ACTIVITIES
FOR THE MONTH OF DECEMBER 2023
TREATMENT PLANT/SEWER/OTHER INCIDENT INVESTIGATIONS

San Jose Creek- East WRP Dark Water with Petroleum Odor in Primary Tanks

On Sunday, December 03, 2023, at 1425 hours, SJC WRP Operations called the Industrial Waste Section to report black tar-like wastewater in the primary tanks. The wastewater had a pungent, tar odor with no other reported operational anomalies. The same wastewater was observed by operations the previous night, Saturday, December 02, 2023, with no adverse effect to treatment plant operations. Operations obtained primary samples for each event.

Industrial Waste inspectors investigated several tributary industrial users with possible petroleum oil operations and found Pacific Palms Petroleum, LLC (FID 9244214) to be the only active oil producer upstream of SJCEWRP. Inspections performed at the facility found significant oil in the clarifier, discharge piping, and legal sample point (Figure 1). IW inspection dialogue with the consulting firm (Allenco Co), which operates and maintains the Pacific Palms oil lease, revealed that they were aware of oil at the situs. A boiler malfunction created a cascade of events resulting in a reduced capacity to phase separate the oil from the formation brine water, which allowed an excessive amount of oil to flow to the sewer. The consulting firm acknowledged the facility was at fault for the oily discharge to the sewer and surface soil at the situs. A sample collected from the Pacific Palms legal sample point and a SJCEWRP raw influent sample were submitted for Infrared (IR) Scan analysis with results showing similar peaks (Figure 2).

Figure 1. Oil at Pacific Palms Legal Sample Point.

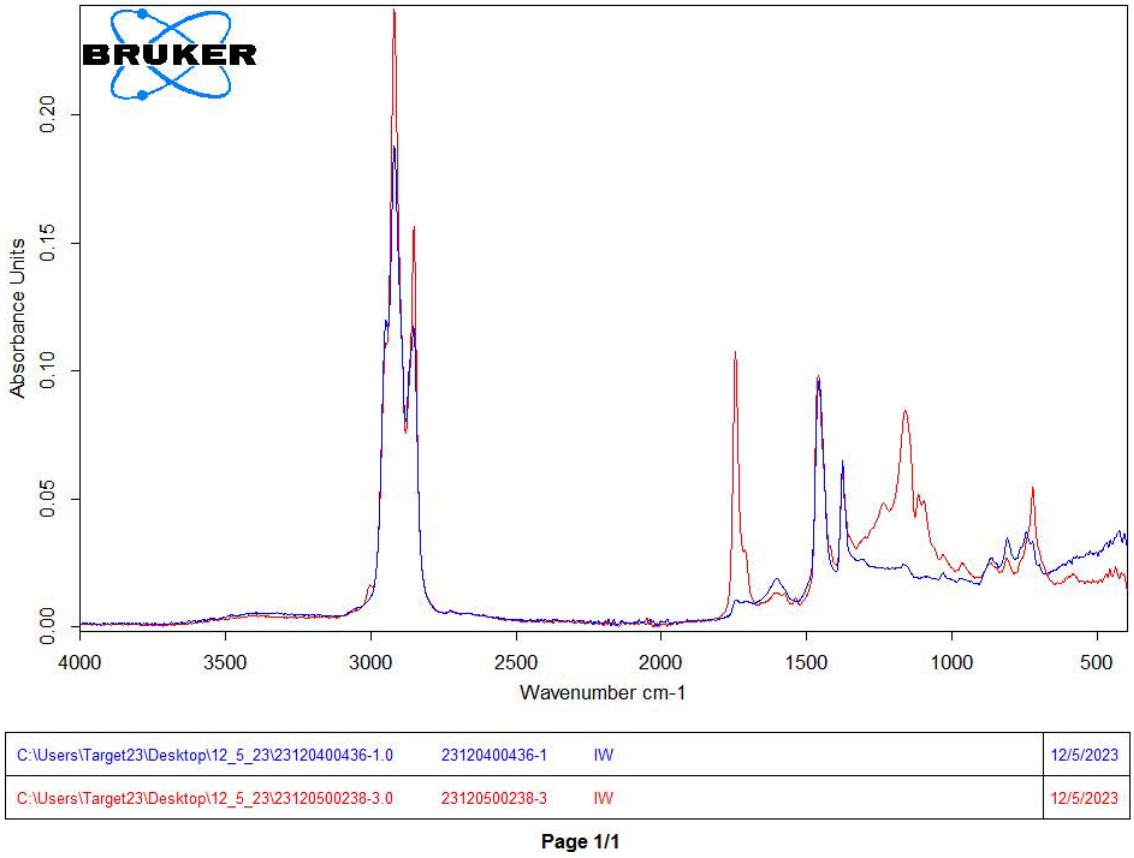


Figure 2. IR Scan of WRP and Pacific Palms Petroleum, llc samples

Pacific Palms Petroleum LLC was found to be the source for the oily water at the SJCEWRP based on inspection observations, discussions with the facility's consulting firm, and IR scan results. A Notice of Violation was issued to the company citing LACSD Wastewater Ordinance Sections: 406H (Discharge of petroleum), 406 (Discharge of any waste that would adversely affect treatment processes), 412 (failure to maintain pretreatment systems), and 206 (interfering with entrance to authorized districts inspectors. There was no impact to District facilities or operations.

Illegal Discharge Tip Universal Plastics San Dimas

On Friday December 08, 2023, at 0911 hours, the Industrial Waste Section received an email from the Enforcement Unit of the Los Angeles Regional Water Quality Control Board (LARWCB) regarding a complaint of "Illegal disposal of plastic waste and illegal treatment of sewage" at Universal Plastic Recycling (FID 9254753). LARWCB received conflicting information from site and consulting contacts that the facility either holds a permit to discharge to sewer or has been discharging to the sewer without a permit for 7 years.

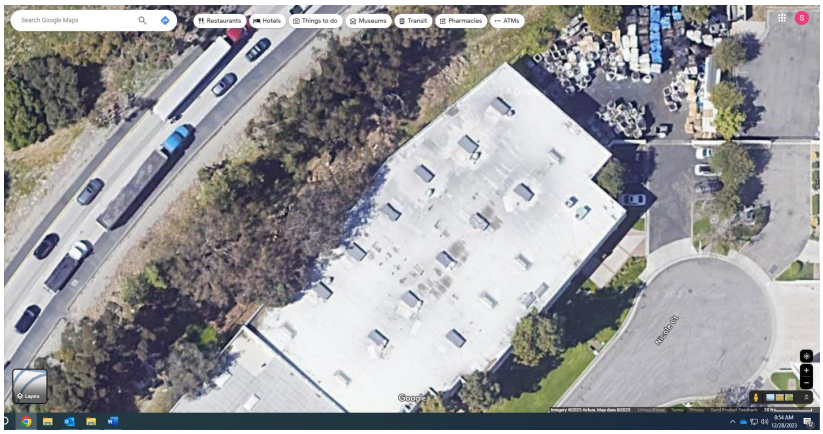


Figure 1. Universal Plastics Recycling, 1181 Nicole Court.

Industrial Waste inspections performed in response to the complaint found no evidence of production wastewater discharge to the sanitary sewer but did observe evidence that wastewater is being routinely discharged to a stormwater swale on Nicole Court. LARWCB was notified of stormwater concerns, e.g. who will perform inspections to ensure compliance to stormwater regulations. Industrial Waste inspections also found unsafe working conditions, which include extension cords, unsafe electrical connections, spinning belts and other equipment being operated without safety guards. A referral was made to Cal OSHA, who will perform inspections to ensure safe working conditions. Universal Plastic Recycling has notified the Industrial Waste Section that they will apply for an Industrial Wastewater Discharge Permit through their local agency.

San Jose Creek- East & West WRP Low Dissolved Oxygen Levels

On Saturday, December 16, 2023, at 2014 hours, SJC WRP Operations notified the Industrial Waste Section that the east (SJCE) and west (SJCW) plants were experiencing low dissolved oxygen in the secondary aeration tanks (Figures 1 & 2). The influent was diverted into empty primary tanks to moderate the effects of the suspected high COD wastewater. SJCE & SJCW continued to experience a pattern of low dissolved oxygen for the next two consecutive days. The influent exhibited no abnormal characteristics in color, odor, pH, and viscosity. Operations collected raw influent and primary samples throughout event. Subsequent analysis of the SJCE primary-effluent grab samples collected on December.15, 2023 and December 16, 2023, by operations, found slightly elevated Chemical Oxygen Demand (COD) concentrations at 525 mg/L and 633 mg/L, respectively.

Figure 1. SJC East D.O. Drop December 16, 2023, 1835 hours.

Figure 2. SJC West D.O. Drop December 16, 2023, 1835 hours.

Industrial users tributary to both SJCE and SJCW having a potential to discharge high COD wastewater were inspected. Several facilities, such as Alta Dena (FID 9256634), Driftwood Dairies (FID 9242424), Tropicana (FID 1922151), and Langers Juices (FID 1901732), had operations during the timeframe of the incident, but there were no observed or reported significant spills or operational anomalies at these facilities. In total, 34 inspections were completed in response to this event by day and night inspection staff. Inspection staff will continue to keep industrial users in compliance with permit limits and educate/remind those users to notify the Districts when/if spills of product occur that could adversely impact the downstream water reclamation plant. There was no NPDES violation because of this incident.

Fire at Trident Plating

On Monday, December 4, 2023, the Industrial Waste Section became aware of a hazardous materials spill report listed on the California Office of Emergency Services website describing a “minor” fire on Friday, December 1, 2023, at Trident Plating (FID 2054273). A reported 2,700 gallons of firewater was used to extinguish the fire, which entered the storm drain.

Figure 1. Fire-damaged gold plating line.

An inspection was performed at the facility in response to the spill report. Trident Plating does metal finishing for aerospace and defense contractors. The fire was limited to a small area of the building, which destroyed a gold plating line (Figure 1). The cause of the fire was not known but a company official suspected it was from an electrical short. The company plans to work with its cleaning and restoration contractor to have the remaining liquid and debris hauled away by a licensed hauler. There was no evidence that any of the fire water or spilled liquids entered the sewer, however, a follow-up inspection will be conducted to ensure the remaining wastes are disposed of properly.

Elevated LEL at Air Products Manufacturing

On Thursday, December 7, 2023, at 0857 hours, Air Products Manufacturing (FID 9258756) notified the Industrial Waste Section that they had ceased industrial wastewater discharge to the sewer due to a lower explosive limit (LEL) exceeding 20%. Air Products Manufacturing is a beef tallow refinery that produces renewable jet and diesel fuel, naphtha, and liquified petroleum gas. Under their discharge permit, the company is required to divert flow from the sewer and contact the Sanitation Districts and the local fire department when their discharge exceeds 20% LEL. An industrial waste inspector immediately responded to the site and verified the discharge presented no threat to the downstream sewerage after taking sewer gas measurements downstream of the facility's connection. The inspection determined the source of the LEL was from the facility bypassing their sour water stripper, a key piece of pretreatment equipment used to remove sulfides and degas hydrocarbons from the wastewater. Due to a pump failure in the sour water treatment system and a concern of overflowing a sour water tank, facility operators drained a sour water tank directly into a wastewater line to the sewer. By Saturday, December 9, 2023, the sour water treatment system was returned to service and the company resumed discharge to the sewer. Though the company complied with the permit requirement to notify the Districts due to the LEL incident, a Notice of Violation was issued for bypassing pretreatment equipment without Districts' approval.

Odors at the Main Street Pumping Plant

On Thursday, December 14, 2023, at 0816 hours, the Wastewater Collection Systems Section contacted the Industrial Waste Section to report a "strong abnormal odor" at the Districts' Main Street Pumping Plant (MSPP). The reported odors were detected all days of the week except on Sundays.

I.W. Inspectors conducted inspections at several industrial users upstream of the MSPP; however, only Chemtrans (FID 1947894) was found to discharge highly odorous wastes. Chemtrans is approximately 4.5 miles upstream of the MSPP (Figure 1) and performs centralized waste treatment and tank truck cleaning. Part of their operation is the treatment and discharge of landfill leachate to the sewer, which regularly receives loads from the Chiquita Canyon landfill in Castaic, CA. A joint inspection with the Los Angeles County Department of Regional Planning and the Los Angeles County Fire Department was coincidentally scheduled at Chemtrans the same day of the report due to recent nuisance odor complaints in the local sewer and the surrounding area. The leachate odor was similar to the odor detected at the MSPP and likely the source.

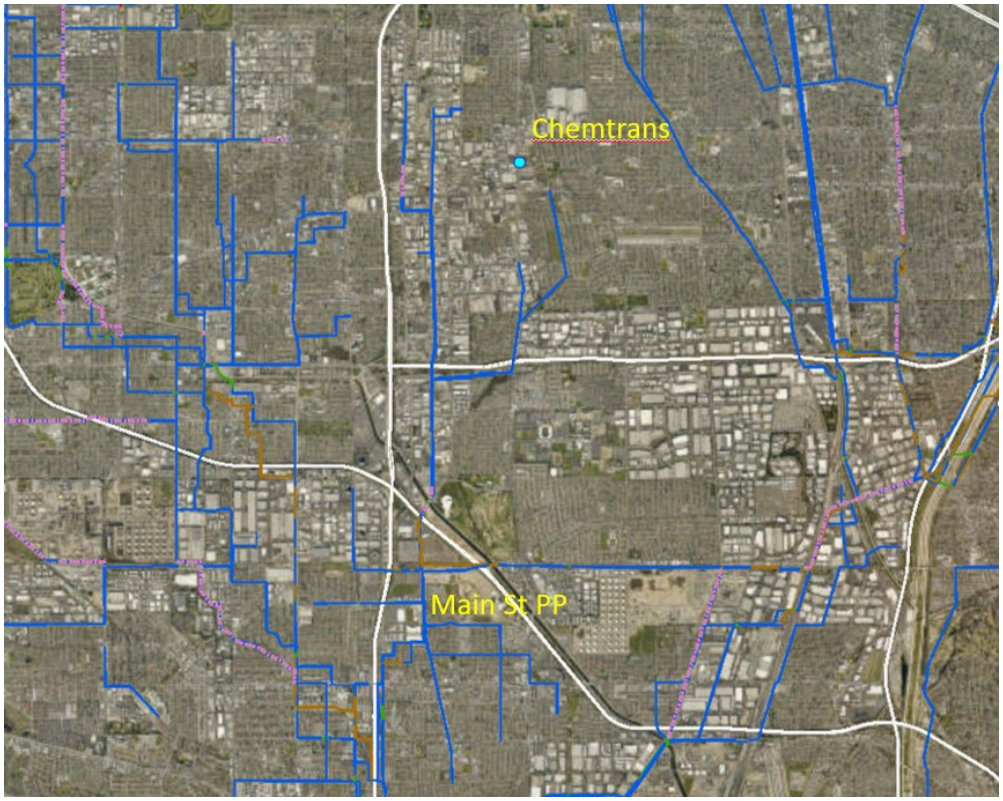


Figure 1. GIS Map of Chemtrans in relation to the Main Street Pumping Plant.

As a result of the multiagency inspection on Saturday, December 14, 2023, Chemtrans received a Notice of Violation from the Los Angeles County Fire Department for failing to provide analysis of received wastes and failing to demonstrate they do not receive hazardous wastes. Additionally, the Department of Regional Planning is preparing to issue violation notices for improper use of the property. The Industrial Waste Section is in the process of revising Chemtrans' discharge permit to address ongoing discharge violations. Industrial waste inspectors will conduct sampling of the headspace gases at the pumping plant and downstream of Chemtrans and continue to monitor Chemtrans closely with rigorous enforcement of the permit requirements and the *Wastewater Ordinance*.