2019 ANNUAL REPORT

INDUSTRIAL WASTE PRETREATMENT PROGRAM

LOS ANGELES COUNTY SANITATION DISTRICTS

ROBERT C. FERRANTE
CHIEF ENGINEER AND GENERAL MANAGER

SUBMITTED
April 14, 2020

APPENDIX H
INDUSTRIAL WASTE REPORTS ON INCIDENTS

2019 SUMMARY OF TREATMENT PLANT INCIDENTS

Type of Incident	JWPCP	SJC-E WRP	SJC-W WRP	LC WRP	LB WRP	WN WRP	POM WRP	VAL WRP	SAUG WRP	LAN WRP	PALM WRP	La Can WRP	Total
COD/Solids/ Ragging			1		1	1				1			**4**
Metals/ Cyanide							1						**1**
Toxicity													**0**
pH High				2	2		2						**6**
pH Low				3	2								**5**
Turbidity													**0**
Grease													**0**
LEL	3												**3**
NDMA													**0**
Color			1	4		1	1		1		1		**9**
Foam							1						**1**
Chloride							1						**1**
Odor													**0**
Ammonia													**0**
Excess Flow	1												**1**
Total	4	0	2	9	5	2	6	0	1	1	1	0	**31**

2019 PUMP PLANT INCIDENTS INVESTIGATED	
EXCESS FLOW	
PERSONAL WIPE RAGGING	
OTHER RAGGING	
FLAMMABILITY/LEL	
COLOR	
CORROSION	
EXCESS MAINTENANCE	1
ODOR	1
OILY SLUDGE/GREASE	1
TOTAL	**3**

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

2019 SURFACE DISCHARGE INCIDENTS INVESTIGATED	
IU - SPILL	11
RIVER SPILL/DUMP	
FUEL/SOLVENT	2
CHEMICAL/PAINT SPILL	2
SEPTIC WASTE DUMP	
GROUNDWATER CONTAMINATION	
NUISANCE DISCHARGE	2
Total	**17**

2019 SEWER INCIDENTS INVESTIGATED	
Elevated H2S reported by Sewer crew	2
ODOR- Sulfide	
ODOR-Other	2
FIRE INVESTIGATION: Non-refinery	
FOAM	
OIL/FUEL/SOLVENT	2
RAGGING	2
EXCESS SOLIDS	
SCALE	2
Elevated LEL reported by sewer crew	1
LOW pH	
CORROSION	
RAINWATER	1
COLOR	
BLOCKAGE/SSO Due to Grease	4
BLOCKAGE/SSO Not due to Grease	4
ILLEGAL ACCESS TO MANHOLE	
EXCESS FLOW	1
ILLEGAL DUMP	4
Total	**25**

2019 SUMMARY OF INCIDENT REFERRALS											
Nature of Incident											
Caller ID	Industrial User off-spec or non-permitted discharge			IU Equipment Malfunction	Odor Reports	Refinery Fire or impound of off spec waste reports	Sewer Excess Flow	Misc. Haz or Non-Haz Sewer Discharge	Non-Refinery Fire	Non-sewer related incidents	**Total**
	Acid	Oil	Misc								
IU Release	2	1	3	15		18					39
IU SMR Call			18								18
Public Agency	1			1					3		5
IWMC or CSD	41		1						2	1	45
Citizen					3						3
Anonymous											0
News Report									2		2
Total	44	1	22	16	3	18	0	0	7	1	112

2019 LIQUID WASTE DISPOSAL STATION REFERRALS									
	EXCESS SOLIDS	EXCESS GREASE	IRREGULAR RECORDS	LOW/HIGH pH	EXCESS TDS	SUSPICIOUS ACTIVITY	INAPPROPRIATE SOURCE	MISC.	**TOTAL**
Attendant calls for assistance or investigation		1		11	3	1		2	**18**

INDUSTRIAL WASTE SECTION
SUMMARY OF ACTIVITIES
FOR THE MONTH OF JANUARY 2019

TREATMENT PLANT/SEWER/OTHER INCIDENT INVESTIGATIONS

Coyote Creek Pumping Plant Heavy Grease

On Thursday, 1-3-19 at 0800 hours, Jeff Masters, Districts' Supervisor of Pumping Plant Operations and Maintenance called Supervising IW Inspector John Boyd and reported that his maintenance technicians were again seeing heavy greasing at the Coyote Creek Pumping Plant in Cerritos while conducting their annual maintenance duties at the plant. Specifically, they are observing grease in the check valves. This condition was also noted during similar maintenance operations about a year earlier on December 12, 2017.

Team 2 Senior IW Inspector Jim Percy, as well as fellow Team 2 Inspectors James McCurdy and Jason Finn met with operators on-site at the pumping plant at 1000 hours on 1-3-19, and again on Monday, 1-7-19 at 0930 hours. A layer of accumulated grease was observed in the pump housings. Heavy greasing was also observed in the adjacent check valves (see Figure 1 below). The grease appears to be cooking grease as opposed to any petroleum-related material. Inspections of upstream industrial wastewater dischargers conducted over the previous year as a result of the December 2017 report have not identified any source(s) for this grease; however it's suspected that at least some of the grease may be coming from a relatively nearby large restaurant, Clearman's North Woods Inn, which discharges directly into the District's 18" Valley View trunk. This trunk feeds wastewater to the Coyote Creek Pumping Plant. The restaurant is located about 1.2 miles upstream of the pumping plant (see Figure 2 below). Inspection of the restaurant on 1-14-19 found that the restaurant lacks any grease control equipment such as under-sink grease traps or a grease interceptor. IW Inspectors are working with the Los Angeles County Department of Public Works and City of La Mirada code enforcement officials to require grease control equipment be installed by the restaurant. IW Inspectors will also continue to be vigilant for other potential grease sources located upstream of the pumping plant.

Clearman's North Woods Inn FID# 9254277 0 GPD
14305 Firestone Blvd
La Mirada, CA 90638

Figure 1: 1-7-19 Photo of heavy greasing in one of the check valves at the Coyote Creek Pumping Plant.

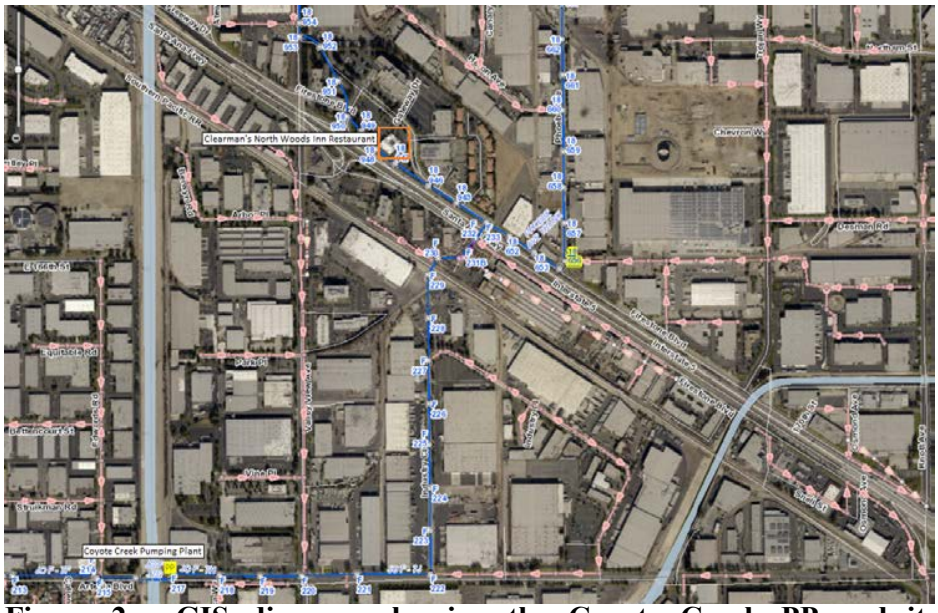

Figure 2: GIS diagram showing the Coyote Creek PP and its upstream Area which includes the Clearman's North Woods Inn restaurant.

Sanitary Sewer Overflow in San Gabriel

On Thursday, 1-3-19 at 1450 hours, City of San Gabriel Street Maintenance Lead Chris Camacho called Supervising Inspector John Boyd and reported that he was on-site at 402 S. San Gabriel Boulevard responding to a report of a sanitary sewer overflow (SSO) at that location. Upon his arrival, Camacho said he encountered the manager of the commercial building located at that address. The owner stated to Camacho that he had dealt with the "County Sanitation Districts" in the past under similar circumstances and that a previously conducted CCTV of the building's sewer line had shown their private lateral line was clear. Camacho called the Sanitation Districts in an attempt to verify this information. Boyd's initial review indicated that the building almost certainly discharges into a local 8" sewer line located on the east side of San Gabriel Boulevard. However, it was noted that the 24" J.O. 1A San Jose Creek Interceptor trunk sewer is also present in the middle of the street at this same address (see Manhole 02 A0387). Boyd noted that it would be very unusual for a local lateral to be connected directly to the interceptor line, but in an abundance of caution, Boyd contacted Night Inspection Team Senior IW Inspector Kent McIntosh and requested he go to the location and meet with Camacho to verify an SSO did not occur at, or due to anything related to, the interceptor sewer trunk line. Camacho stated that a city crew was in the process of cleaning up the spill. Boyd requested McIntosh survey the scene, and asked that if he found that the Districts' line was involved in an SSO that notification should be made immediately to the Long Beach Main Alarm Center to initiate a response from Districts' sewer spill response personnel.

McIntosh and fellow Night Team IW Inspectors Jose Ruiz and Carley Craig arrived at the location at 1625 hours and met with Camacho. They also spoke with the building manager. The building has a restaurant, Dong Lai Shun, on the first floor, 31 condominium units on the second floor, and subterranean parking. The parking lot has several grated drains, which feed water to a large grated sump with a float-activated pump that pumps out to the street gutter on San Gabriel Boulevard. It was determined that this incident was not a sanitary sewer overflow. Instead, a problem with the building's storm water drainage system caused foul-smelling stagnant water held in the parking lot sump to flow to the street gutter. Nothing entered into the City of San Gabriel sewer and certainly not into the Districts' collection system, even though as noted above the JOA-1A SJC WRP Interceptor runs parallel to (actually, in between two) San Gabriel city sewer lines. Using vacuum trucks, the city subsequently removed the foul water from the gutter at 1745 hours (See Figure 3 below) and then washed down and disinfected the gutter areas.

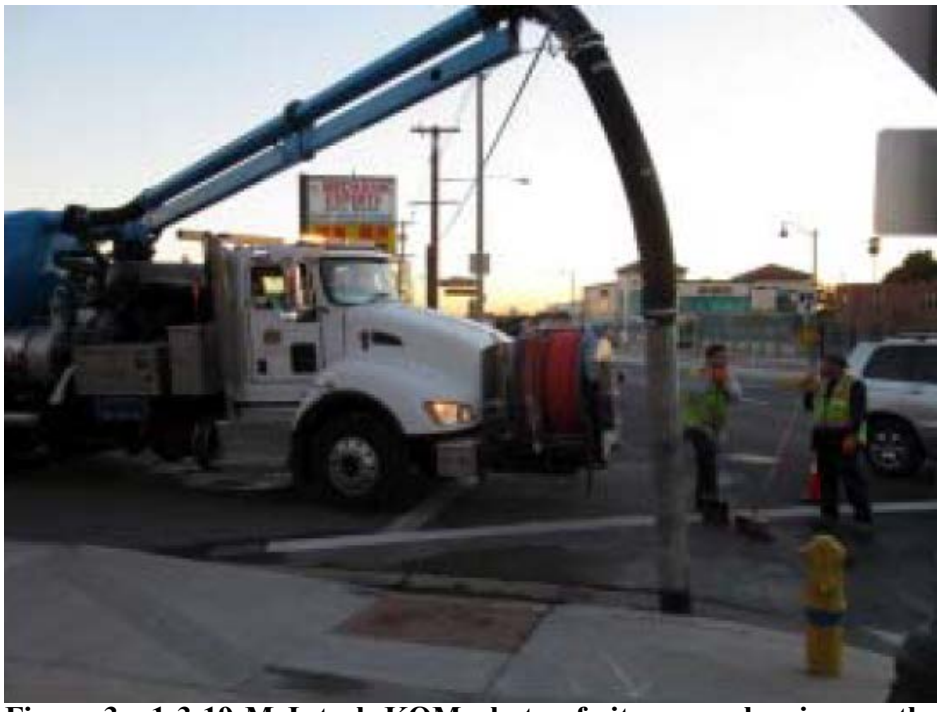

Figure 3: 1-3-19 McIntosh KOM photo of city crew cleaning up the foul-smelling water in the street gutter along San Gabriel Boulevard.

Saugus WRP Green Color

On Thursday, 1-17-19 at 1500 hours, Supervising TPO Ron Foster of the Saugus WRP called Supervising IW Inspector John Boyd and reported that WRP operators had just noted that the water in the secondary clarifiers was an unusual "emerald" green color at 1440 hours. There were no unusual odor or treatment issues associated with the color, nor were the secondary aeration tank dissolved oxygen concentrations outside their normal levels. Foster said the operators took two samples of the material for IW Inspectors and he had also taken some pictures, which he sent to Boyd (see Figures 4 and 5 below).

Figure 4: Picture taken at about 1450 hours on Thursday, 1-17-19 of the green color in the Saugus WRP Secondary Clarifier tanks. Operators described the color as emerald green.

Figure 5: Picture taken at about 1450 hours on Thursday, 1-17-19 of the green color in the Saugus WRP Secondary Clarifier tanks. Operators described the color as emerald green.

Night Team IW Inspectors Jose Ruiz and Carley Craig conducted the initial response to this call, arriving on-site at the Saugus WRP at 1725 on 1-17-19. Area IW Inspector Steven Lajkowicz conducted further follow-up starting the following day. Seven inspections were conducted at possible sources including the Saugus liquid waste disposal station, but no source for the green color was identified. On 1-18-19, Foster stated that there had been no further

green-colored influent to the treatment plant and that plant operational processes had been unaffected by the colored influent. No NPDES violations resulted from this incident. The samples of the green-colored wastewater that were collected at Saugus WRP were submitted to the San Jose Creek research lab for analysis. Results of the analysis showed that the green colored dye present in the wastewater closely resembled green food grade dye. Lajkowicz will remain vigilant to any facilities that could have caused this incident.

Alleged Illicit Discharge(s) at Rucci Forged in Montebello

On Thursday, 1-18-19 at 0700 hours, South Teams' Supervising IW Inspector David Sanchez noted on the California State Office of Emergency Services (Cal OES) hazardous materials spill website that at the National Response Center (NRC) had received a report the previous day from someone (an anonymous source) stating that an industrial facility located at 6865 E. Washington Blvd. in Montebello was dumping an unknown white-colored fluid "down the drain." The name of the facility was not given in the report, but review of Districts' iPACS data indicated that the address was occupied by Rucci Forged, a manufacturer of aluminum alloy car wheels. Record review indicated the only historical inspection of the facility conducted by Districts' staff occurred on 5-3-17 by Senior IW Inspector Steve Sealy. Sealy's inspection comments indicated the company was not performing any metal finishing operations on-site that resulted in any industrial wastewater being generated or discharged. Sealy stated the company subcontracts to off-site companies all metal finishing operations conducted on the wheels including any painting or chrome anodizing. He noted that there were multiple CNC (computer numerical control) machining operations on-site that use a cutting fluid/coolant. It was noted that this type of cutting fluid is usually white-colored. The information was forwarded to current Area IW Inspector Greg Neunsinger for follow-up.

Rucci Forged FID#9250431 0 GPD
6865 E. Washington Blvd.
Montebello, CA 90640

Neunsinger arrived on-site at Rucci Forged at 1010 hours on 1-18-19. His inspection revealed that the issue reported to the NRC involved a storm drain that is located near the loading dock at the facility. This drain does not have a sewer access. According to the company contact, Manager Nick Abouna, the incident had already been investigated the previous day by the Los Angeles County Fire Department Hazardous Materials Inspector Eric Gonzalez.

The company stores drums of waste and virgin water soluble machine cutting fluid/oil in the loading dock area. This area is uncovered and not protected from rainfall. During a recent large rainstorm some of the cutting fluid entered the exposed loading dock, mixed with the rainwater and then flowed to gutters on Washington Blvd. where it was apparently observed by the reporting party. Neunsinger observed a total of 8 drums that were stacked on 2 pallets that were involved in this incident. Abouna stated that Gonzalez had required the company to clean up the loading dock area and protect it from spillages that could get off-site by installing proper spill containment pallet trays. He also ordered the drums be kept under cover. Neunsinger verified that there was no industrial wastewater generated or sewered by their manufacturing processes on-site.

Neunsinger conducted a follow-up inspection at the facility on 2-4-19 and found that a proper spill containment pallet had been purchased on put into use for storage of the waste cutting oil drums (see Figure 6 below) though the area had yet to be covered. No further action by the Districts' industrial waste inspection staff is anticipated.

Figure 6: 2-4-19 GN photo showing the company's new containment pallet that was purchased and installed to prevent any spill(s) reaching the stormdrain.

INDUSTRIAL WASTE SECTION
SUMMARY OF ACTIVITIES
FOR THE MONTH OF FEBRUARY 2019

TREATMENT PLANT/SEWER/OTHER INCIDENT INVESTIGATIONS

El Niño Emergency Flow Plan Implementation

On Saturday, 2-2-19 at 1653 hours, Supervising IW Inspector John Boyd received a telephone call from Long Beach Main Pumping Plant Alarm Center Operator Walt Hodgson. Hodgson said that he had just received a call from JWPCP Supervising TPO II Sam Mapatunage. Mapatunage requested that the Industrial Waste Section be notified immediately to implement the "El Niño Emergency Flow Diversion Plan" due to JWPCP's influent flow rate having exceeded the 575 MGD tripping point for plan implementation. The flow at that point in time had reached 600 MGD due to an ongoing rainstorm in Southern California. Boyd called Mapatunage back at 1700 hours and it was confirmed that the influent flowrate at that moment was 605 MGD. Boyd agreed to implement the plan immediately. Note that the plan essentially requires that when notified by phone, each of the five large refinery operations, along with two associated terminal operation facilities, cease ALL their discharge flow to the sewer within 30 minutes, and then impound this wastewater/rainwater for a period of 4.0 hours before resuming discharge flow to the sewer. The requirements of the plan are stated in the requirement lists of the IW permits of these facilities.

Boyd was able to successfully and quickly contact and notify all the facilities covered under the plan. All the facilities then called back to state they had ceased their flow to the sewer by 1740 hours. Boyd spoke again with Mapatunage at 1604 hours, at which time the influent flowrate had reached 625 MGD. Between 2139 and 2200 hours later that evening Boyd spoke with the facilities to give permission and acknowledge they were returning to normal discharge operations to the sewer. At 2200 hours Mapatunage said that due to the storm easing up, influent flows had gone down to about 500 MGD. He stated the peak flowrate earlier that evening had been 626 MGD and had occurred shortly after their earlier conversation at 1604 hours.

Implementation of the plan helped the JWPCP to successfully manage the high influent flow rates on 2-2-19. Boyd noted that this represented the second time the plan had been implemented since 2010. The most recent prior implementation of the plan occurred on 2-17-2017.

Los Coyotes WRP Brown Color

On Friday, 2-8-19 at 0935 hours, Los Coyotes WRP TPO II Tom Jauregui called Inspector Sanjay Patel to report brown color in the final effluent. Patel and Team 2 Senior Inspector Jim Percy responded to the outfall and verified a slight brown color was present in the forebay. Secchi disc visibility measured 8 knots (good), and the turbidity of final effluent was 0.595 NTU (also good). Operators collected samples of secondary and final effluent, and gave them to the inspectors for possible analysis.

Percy, as well as IW Inspectors Tingting Wei and Patel, inspected six potential industrial color source sources on 2-8-19 in response to this incident, including the two main major suspects for this type of color incident, Shaw Diversified Services, a carpet manufacturing and dyeing facility and Tri-Star Dyeing and Finishing, a large textile dyeing facility. The color observed in the effluent at Tri-Star (burgundy) was similar to that observed at the treatment plant but the wastewater samples tested by Wei passed the 50:1 color dilution test indicating compliance with their limit at the time of the inspection. However, Wei noted that the facility's required automatic hourly sampler was nonfunctional during the inspection and had been off line for approximately 2 weeks. This disallowed Wei from being able to observe and test a sample of the facility's wastewater discharge which would have corresponded with that of the colored wastewater received at the treatment plant. It thus remains unknown if Tri-Star was the source for this incident at the WRP, though previous similar color incidents at the WRP have been

regularly attributed by IW inspectors to discharges from Tri-Star. Wei issued Tri-Star a Notice of Violation for failing to maintain the required sampling equipment and required that until the automatic sampler was fixed they had to collect hourly samples manually.

Tri-Star Dyeing and Finishing IW 17196 450,000 GPD
15125 Marquardt Avenue
Santa Fe Springs, CA 90670

The colored treated water observed at the WRP forebay fortunately did not result in an NPDES violation, nor does the color appear to have adversely affected the plant's treatment processes. Inspectors continue to monitor the Tri-Star facility frequently.

Sanitary Sewer Overflow on the Arroyo Seco Trunk Sewer in South Pasadena

On Monday, 2-11-19 at 1430 hours Team 1 Senior IW Inspector Peter Carlstrom noted that the California State Office of Emergency Services (OES) website had just posted a report of a sanitary sewer overflow (SSO) at the intersection of Garfield Avenue and Mission Street in the city of South Pasadena. The report indicated that 9,000 gallons of sewage was spilled from Manhole (MH) 16 0186 on the 18" Arroyo Seco Trunk, Section 3.

Carlstrom and IW Inspector Hanks responded to the report to see if IW staff could render any assistance. Such assistance typically includes identifying any upstream industrial wastewater sources that may have contributed to the cause or content of the overflow. If samples of the spilled material need to be taken and analyzed inspectors can assist in both the sampling as well as the identification of which parameters the sample should be analyzed for considering the upstream industrial sources of wastewater.

Carlstrom and Hanks arrived on-site at MH 16 0186 at 1530 hours on 2-11-19. They learned that raw sewage had been observed to be coming from the manhole that afternoon by a Districts' sewer maintenance crew as they were finishing cleaning sewer lines in the area. It was this crew that reported the spill to the OES. Carlstrom and Hanks were concerned that a recent special permission granted on 2-7-19 by the Industrial Waste Section to the nearby City of Pasadena power plant to discharge 70,000 gallons of lightly contaminated rainwater generated from recent large rainstorms which had been impounded on-site by the power plant, may have been a factor in the overflow. It was noted by the Districts' sewer maintenance crew members that the likely cause of the SSO was a City of South Pasadena sewer maintenance crew that they had observed cleaning/jetting local lines that day upstream of the Districts' trunk such that some debris had been pushed into the trunk line. This debris caused a blockage, which in turn lead to the SSO. The Districts crew found the blockage and cleared it, allowing normal flows to resume. There was no indication that the relatively limited amount of impounded rainwater from the power plant that was being discharged on 2-11-19, about 50 gpm, caused the spill, though some of may have been present in the estimated 9000 gallons of sewage that overflowed. No further action on this event by Industrial Waste Section staff was needed.

Long Beach WRP High pH

On Thursday, 2-14-19 at 1720 hours, Long Beach WRP TPO II Art Lopez called Night Team Supervising Industrial Waste Inspector Andy Woods to report that the plant was experiencing low pH (5.3) influent. At 1740 hours, Woods and IW Inspector Carley Craig arrived at the plant and picked up the grab sample of low pH raw influent taken earlier by WRP operators. The sample had no unusual color or odor. A lab pH test confirmed the sample had a pH of 5.26. WRP influent pH trend data depicted a gradual drop, which alarmed at pH 6.3 at 1651 hours. After the alarm, Lopez stated that he back-flushed the influent sample box to ensure a representative flow was being monitored. The low pH continued after the back-flushing, indicating the readings were accurate. Lopez stated that the plant would continue to receive wastewater since there were no other apparent negative impacts on plant performance. Later that evening at 2050 hours, TPO I Suvit Viboolkij noted during his regular rounds that the influent pipe that feed wastewater to the box where the pH of the influent is monitored was blocked with rags, causing the meter to essentially be measuring the pH of stagnant raw influent trapped there. When Viboolkij cleared the rags the pH reading immediately jumped from about 5.0 to a near

normal-range pH reading of 6.61. Since its unknown how long the ragging blocked the path of free flow across the meter probe it's unclear how long the low pH influent actually persisted.

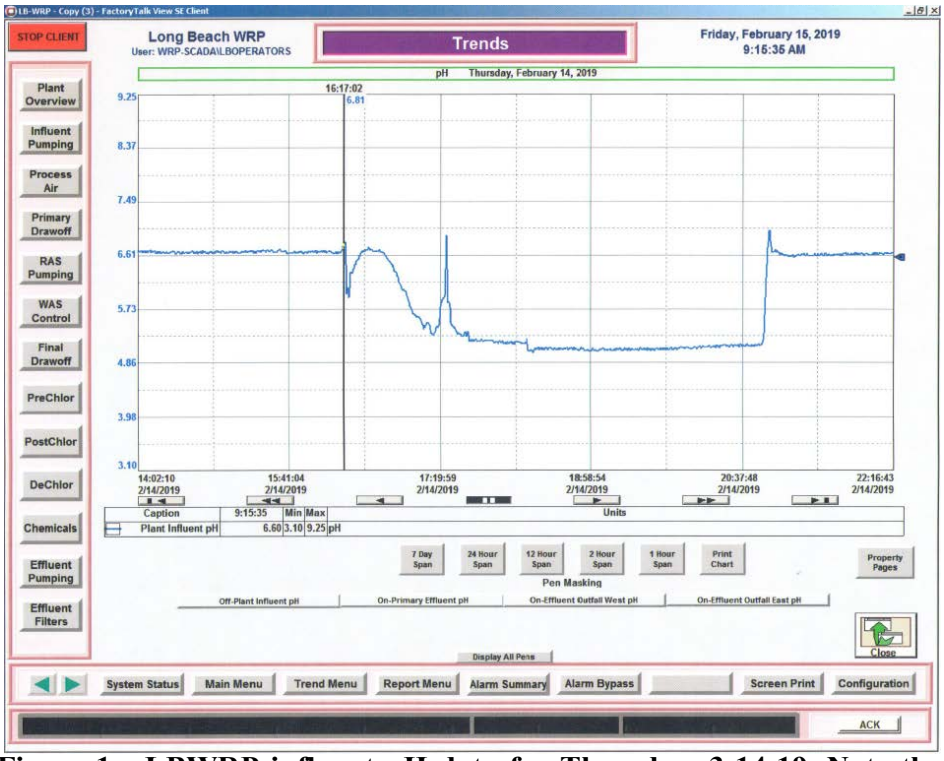

Figure 1: LBWRP influent pH data for Thursday, 3-14-19. Note the drop in pH for approximately 4 hours late in the afternoon that day.

Woods, Craig and IW Inspector Jose Ruiz, as well as members of the Team 2 day inspection team the next day, conducted an extensive upstream investigation looking for the source(s) of this incident, but were unable to identify any. IW Inspectors remain vigilant as to the cause/source of this incident.

Anonymous Tip of Illicit Discharges at the Tesoro Wilmington Oil Refinery

On Monday, 2-18-19 (Presidents' Day holiday) at 1430 hours, the Districts' internet "fraud line" email address received an anonymous tip of suspicious activity. The report/tip stated that there were large amounts (5"-6") of floating oil in pond #2 at the Marathon Petroleum facility as of noon that day. The tip passed through the hands of Districts' managers the following day and was eventually forwarded to Supervising IW Inspector John Boyd for further investigation.

Team 3 Inspector Chris Mendoza investigated the tip on 2-19-19. He visited the Marathon Oil Refinery in Wilmington, which is currently permitted by the Districts as the Tesoro Refining & Marketing Company LLC. This facility has changed ownership and/or name several times over the previous couple of decades. Currently, the facility is listed under the Tesoro name in Districts' records as the recent corporate merger of Tesoro and Marathon Oil was determined that new permit is not required for the merger. Mendoza is very familiar with this refinery, including he knew that the "pond #2" stated in the tip specifically refers to the multi-acre rainwater storage pond located adjacent to the industrial wastewater permit outfall and IW discharge monitoring building at the facility. His inspection of the facility found no evidence of excessive amounts of oil floating on the pond as stated in the tip, or any evidence that there has recently been any such oil or the discharge of such oil to the sewers or storm drains from the pond. The pond did have an unusually large amount of water in it owing to the recent string of large rainstorms that have hit Southern California this year (see Figures 2 and 3). Senior IW Inspector Kent McIntosh also investigated a Marathon Oil Terminalling facility in Long

Beach in the thought that perhaps that was the facility the tipster was referencing, but nothing unusual was noted there either. No further action on this tip was taken.

Tesoro Refining & Marketing Company LLC IW 20098 3,100,000 GPD
2101 E Pacific Coast Highway
Wilmington, CA 90744

Figure 2: Photo taken by Chris Mendoza on 2-19-19 of pond#2 at the Tesoro Carson Refinery.

Figure 3: Photo taken by Chris Mendoza on 2-19-19 of the edge of pond#2 at the Tesoro Carson Refinery. Note the lack of any floating oil or oily sheen.

Pomona WRP Red Color

On Thursday, 2-21-19 at 1600 hours, Pomona WRP TPO II Benson Braxton called Supervising IW Inspector John Boyd and reported that at 1400 hours he had noticed "reddish-pinkish" colored wastewater in the WRP's primary tanks. He noted that by the time of his call the color was no longer entering the treatment plant. The colored wastewater was already passing into the plant's secondary tanks, though there were yet to be any noticeable effects on secondary aeration tank dissolved oxygen levels and the plant influent pH had been steady throughout the day in the normal 7.0-7.2 range. There were also no unusual odors associated with the colored influent. Braxton said he took several samples of the primary wastewater that contained the color (see Figure 4). Braxton stated the WRP was not diverting flow, but he was remaining vigilant to dissolved oxygen levels in the secondary tanks should the colored material prove to be high strength.

Figure 4: Sample of Pomona WRP primary tank wastewater taken on 2-21-19. Note the red color.

Night Team Senior IW Inspector Kent McIntosh, as well as Inspectors Carley Craig and Jose Ruiz conducted the initial response to the report. They inspected four potential sources for the color, including the two main historical suspects for color incidents at the Pomona WRP. These two sources are Master Recycling Center, a beverage disposal facility that received out of date beverages; and Technical Anodize, an aluminum anodizing shop that uses colored dyes as part of their metal processing operations. Both these facilities were found to have conditions which indicated they could have caused or contributed to the color incident at the WRP. At Master Recycling Center it was noted that they had been dumping large volumes of red wine earlier that day, while at Technical Anodize evidence was found that the company had spilled a tank of deeply colored red dye (See Figure 5). Samples from both these sources were taken and are being analytically compared to the sample taken at the WRP to determine if one or both match. It was noted that the managers at Master Recycling claimed they had previously dumped similar amounts of red wine with no known impact on the WRP. While the owner of Technical Anodize denied that he or his employees had actually discharged any of the spilled red dye into

the sewer. Fortunately no NPDES violation(s) resulted from this incident and WRP operations were otherwise unaffected by the presence of the dye/color.

Figure 5: Spilled red dye at Technical Anodize on 2-21-19.

Technical Anodize LLC 1140 Price Street Pomona, CA 91767	IW 21063	2200 GPD
Master Recycling Center 1980 S Reservoir Street Pomona, CA 91766	IW 17014	8000 GPD

Whittier Narrows WRP Ragging

On Wednesday, 2-27-19 at 1458 hours, Senior Engineer Mary Lee of the Sanitation Districts' Water Reclamation Plants Section called Supervising IW Inspector John Boyd and reported that Whittier Narrows WRP operators were finding large rags in the WRP's influent pumps. During recent de-ragging operations of the pumps they collected some of the rags and examined them. Operators don't think that the rags are the now ubiquitous non-woven wipes seen throughout the sewer system. Lee asked Boyd if IW Inspectors would look into the issue by looking at the rags collected by the operators which were currently in a bucket at the WRP. Boyd contacted Team 4 Senior IW Inspector Steve Sealy and it was agreed he would go to the WRP the next day to commence the investigation by examining the rags in the bucket.

Figure 6: Various Rags removed from Whittier Narrows WRP influent pumps. Note that some of the rags are clearly clothing items.

Investigation of the rags at Whittier Narrows WRP found various types of garments such as ladies, men's and children's underwear, socks and miscellaneous scraps of other clothing articles, wood, pine needles, cordura strap, belt and beer can (see Figure 6). That said, the bulk of the rags were in fact the now ubiquitous non-woven wipes. Sealy speculated that it seemed likely there was an open sewer manhole somewhere or one that is being used to dump garbage and then re-closed. He surveyed the area upstream, examining trunk sewer line manholes on the J.O. 'B' and J.O. 'H' lines looking for evidence of manholes being used for this purpose. While he noted many homeless people living proximal to such manholes in the Whittier Narrows Park area as far north as Garvey Avenue, he didn't find any manholes that appeared to be ajar or regularly opened. Sealy spoke with WNWRP Supervising TPO Carlos Alfaro and requested he track the types of materials he's seeing when doing the monthly pump service, as it will help to identify repeatable materials if there are any. Alfaro agreed to this and said he'll call Sealy if he finds anything of interest or that could be of help in terms of this investigation, which will be reopened depending on future findings.

INDUSTRIAL WASTE SECTION
SUMMARY OF ACTIVITIES
FOR THE MONTH OF MARCH 2019

TREATMENT PLANT/SEWER/OTHER INCIDENT INVESTIGATIONS

Los Coyotes WRP Brown Color

On Sunday, 3-3-19 at 1630 hours, Los Coyotes WRP TPO II Rudy Fernandez telephoned Senior IW Inspector Kent McIntosh and reported brown color in the final effluent and filters. McIntosh responded immediately, arriving at the WRP at 1705 hours, where he met with Fernandez and TPO I Araceli Chambers. McIntosh and Chambers confirmed the presence of the color in the effluent forebay (see Figure 1). At 1655 hours operators collected two 1.0 liter samples of the slightly colored final effluent. McIntosh noticed a slight brownish color in the samples.

Figure 1: 4-3-19 final effluent forebay picture at 1711 hours of the brown-colored effluent at Los Coyotes WRP.

McIntosh immediately proceeded to inspect the two main color source suspects, Shaw Diversified Services (a large carpet weaving and dyeing facility) and Tri-Star Dyeing and Finishing (a large textile printing and dyeing facility). McIntosh found that Shaw was not in production that day and had not discharged any significant amounts of industrial wastewater since 1800 hours the previous day. Tri-Star was in normal production and found to be discharging wastewater at an average rate of about 305 gallons per minute that day (peak flow limit=450 gpm). Review of the discharge records at Tri-Star and retained hourly composite samples of their discharge indicated most of the wastewater that day had been brown colored or similar, though when McIntosh tested a few of them, as well as a sample of the ongoing discharge (see Figure 2) he noted that they all passed the 50:1 dilution limit test. The 1825 hours sample of Tri-Star's discharge he took was submitted for color (HPLC) analysis for comparison to the sample taken earlier at the WRP.

Tri-Star Dyeing and Finishing IW 17196 450,000 GPD
15125 Marquardt Avenue
Santa Fe Springs, CA 90670

Figure 2: 1825 hours 3-3-19 grab sample of the discharge at Tri-Star Dyeing and Finishing.

The laboratory results for matching the color of the LCWRP final effluent sample and the Tri-Star sample were inconclusive. The absorbances at variable wavelengths resulted in generally lower absorbance measurements for the Tri-Star sample compared to that of the LCWRP final effluent sample (see Figure 3). Even though the analysis wasn't conclusive enough to cite Tri-Star for causing the incident, there are really no other industrial sources known to the inspection staff that are likely to have caused this incident. Inspectors are continuing to monitor Tri-Star closely. Fortunately this incident did not result in any NPDES violations at the WRP and plant operations were otherwise unaffected.

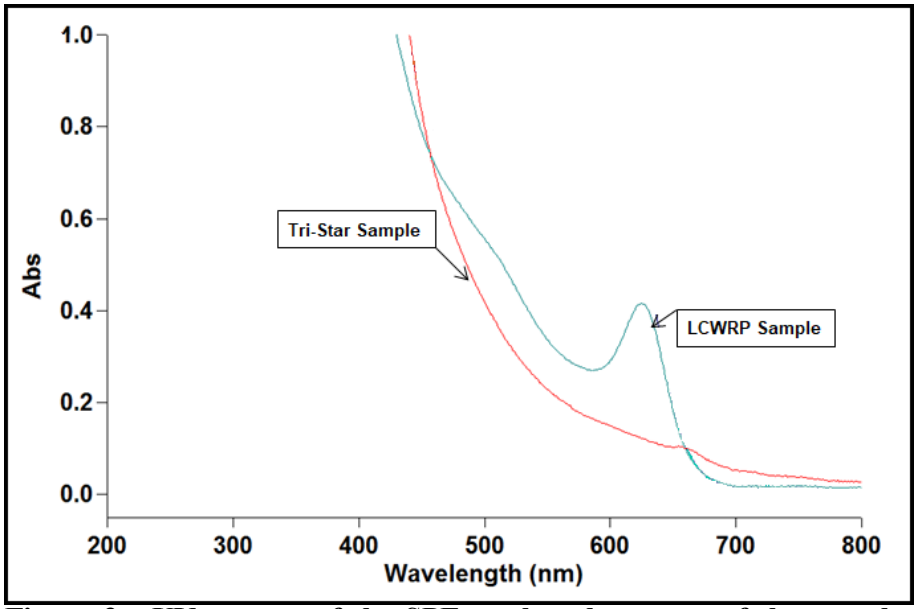

Figure 3: UV spectra of the SPE methanol extracts of the samples taken at LCWRP and Tri-Star Dyeing and Finishing on 3-3-19.

Long Beach WRP High pH

On Monday, 3-4-19 at 0900 hours, Long Beach WRP TPO II Art Lopez called Supervising Industrial Waste Inspector John Boyd and reported that the plant was experiencing high pH influent. He said the pH began increasing at about 0815 hours and by the time of his call at 0900 hours it was already returning to normal. Lopez said he'd contacted Compton Field Office Supervising Engineering Technician Albert Steele about the high pH and been told there was not any caustic addition upstream of the Long Beach WRP scheduled for that day. Boyd notified South Teams' Supervising IW Inspector David Sanchez of the report for inspection follow-up.

After speaking with TPO II Lopez and alerting Sanchez to the incident, Boyd checked the daily caustic addition and crown spray activity emails that are sent to WRP operators, as well as the IW Inspection staff. He confirmed that the caustic addition schedule did not list any manholes or lines upstream of the Long Beach WRP. However, review of the revised crown spray activity schedule for 3-4-19 revealed that there WAS crown spray scheduled for 3 reaches of trunk sewer line on J.O. 'C' unit 4B from MH 03C 0619 to MH 03A 0247 on Clark Avenue in Long Beach. This section of trunk line feeds into the Long Beach WRP interceptor line at MH 03A 0247. Boyd then spoke with Steele and he admitted that he had somehow overlooked the crown spray activity and this was the likely source of the high pH incident at the WRP. Boyd then notified both the IW inspection staff and Lopez of the finding of the scheduled crown spray activity. Percy and IW Inspector Jason Finn will still visit the WRP to speak with the operators and observe if any further high pH wastewater comes into the plant, as is likely since more than one reach of sewer influent to the WRP was scheduled for crown spray activity.

Referral of Illicit Discharge at Sterling Machinery in South El Monte

On Thursday, 3-7-19 at 0904 hours, Los Angeles County Fire Department Health Hazmat Inspector Eric Bald sent an email to Districts' Industrial Waste Permit Engineer Sue Zhu regarding Sterling Machinery Exchange in South El Monte. He sent the email after conducting a recent inspection at the facility where he saw what he determined to be a newly installed drain that was inappropriately plumbed to the sewer system, as it was being used to collect and discharge storm water, not sewage. Bald stated he thought the drain should have been plumbed to the storm drain collection system. Zhu forwarded the email to Supervising IW Inspector John Boyd, who in turn forwarded it to Area IW Inspector Ken Hanks for follow-up. Bald's email included a picture he took of the drain (actually a sewer clean-out) in question showing a hose in it (see Figure 4).

Sterling Machinery Exchange FID 1899934 0 GPD
9310 Garvey Avenue
South El Monte, CA 91733

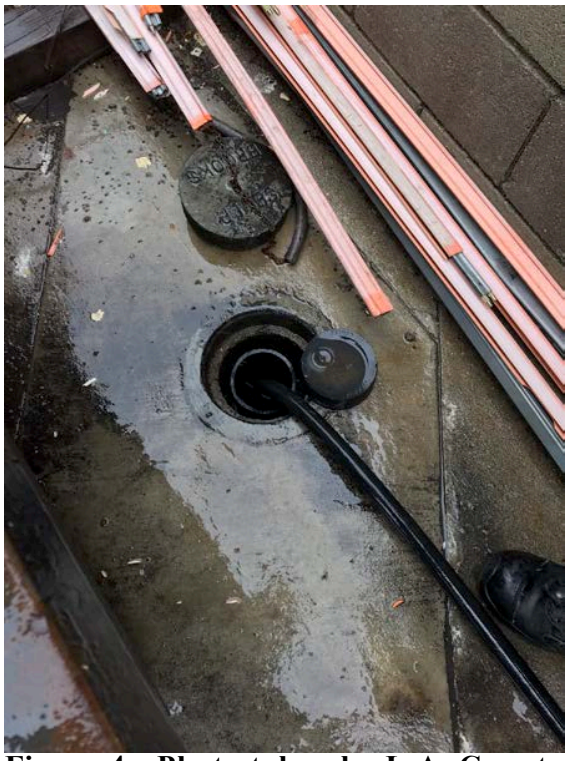

Figure 4: Photo taken by L.A. County Fire Department Health/Hazmat Inspector Eric Bald of the sewer line cleanout at Sterling Machinery Exchange.

Area IW Inspector Kent Hanks conducted the investigation into this referral, inspecting the facility on 3-11-19. Sterling Machinery Exchange is an industrial machine dealer. They buy, sell and broker industrial machines such as CNC (Computer Numerical Control) machines. The company does not have an industrial wastewater discharge permit, nor do they need one as there was no evidence found that they generate or sewer any industrial wastewater. The site consists of a sales room, several repair shops for paint touchups and light repairs, and storage buildings. Some machines are stored in an outdoor area without cover. The contact claimed they do not dispose of any fluids from the machines.

In the outdoor storage area, the pavement slopes towards a central blind sump. The contact stated that under normal conditions, the blind sump does capture rainwater during storms, but that this subsequently evaporates. However, because of this winter's unusual heavy rains, the sump had overflowed, causing excessive pooling/flooding in the yard. To relieve the flooding, the company installed a small pump in the sump and directed the pump discharge flow into a nearby sewer line cleanout along the building's west wall. Hanks informed him that storm water is not allowed to be discharged to the sewer without a permit, and that the cap to the cleanout should stay in place at all times unless the sewer line needs to be maintained or cleaned. The contact stated that going forward they would not discharge any storm water to the sewer, instead directing it to the street stormdrain or allowing it to evaporate in place.

<u>Excessive Rags in the J.O. 'A' Unit 9 Trunk Sewer in South Gate</u>

On Friday, 3-8-19 at 0806 hours, Supervisor of Sewer Maintenance Rick Pearce reported to Senior IW Inspector Bill Barnum that one of his sewer maintenance crews was again seeing large amounts of rags, including what appear to be hairnets, in the 42" J.O. 'A' Unit 9 trunk sewer just downstream of Rockview Dairies in South Gate. Similar rags were reported by Pearce in August 2013. At that time, Rockview Dairies was determined to be the source of the rags and they were issued a written Notice of Violation (NOV) for discharging waste that causes the sewer to plug. On 3-8-19 Pearce told Barnum that his crew had brought back a bag of the rags found in the section of trunk sewer line in question (MHs A1169-A1167).

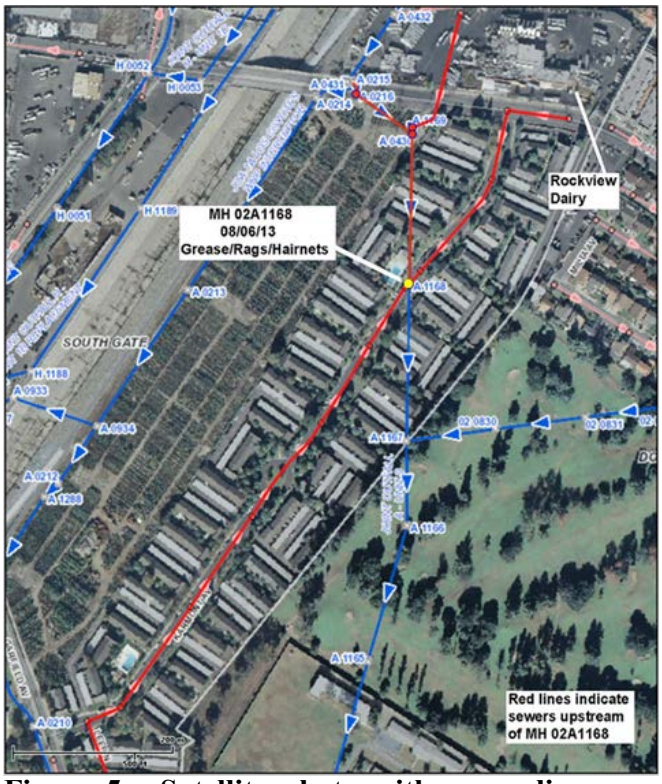

Figure 5: Satellite photo with sewer line map overlay showing the area where rags/hairnets continue to be found in the J.O. 'A' Unit 9 trunk sewer.

Team 4 Senior Inspector Steve Sealy and Area IW Inspector Neil Tran investigated the report. They met with Pearce at the Compton Field Office on 3-18-19 to see the rags. Pearce stated that the ragging issue continues to be a problem between MH 1168 and MH 1169 and that this issue has been ongoing for many years. He reiterated the issue has never changed since the first reports in 2013. He stated the normal flows in this section of sewer are inconsistent and far too low for a 42" line in order to move any bulky items such as rags, which end up piling up and staying in the line. It was noted that the only flow sources in this section of the line are 27 homes and Rockview Dairies. Pearce stated they are currently cleaning the line every 6 months and that he has requested permission from collection system managers to allow the regular partial opening of the stop-log at MH A 0215 upstream which would help clear these rags and associated debris from the line. Inspection of the rags collected found that a large portion were indeed hair nets, indicating Rockview Dairies remains the problem source. It is speculated that company employees are continuing to flush them regularly. Some of the now ubiquitous "flushable" non-woven plastic fabric wipes were also present in the rags. These are unlikely to have come from dairy, more likely they came from one or more of the residences located upstream.

Rockview Dairies, Inc. IW 1422 114,000 GPD
5941 Southern Avenue
South Gate, CA 90280

Tran inspected the Rockview Dairies facility on 3-18-19 and 3-21-19. His inspection revealed some corroborating evidence that company employees are continuing to flush hairnets into the toilets. This facility pasteurizes raw milk and juices; operating 24 hours/day, 7 days a week, with 300 employees. All production employees wear hairnets; at the end of their shifts, employees are instructed to dispose their hairnets into trash containers, but Tran noted few hairnets in the trash containers in the locker room areas. Tran noted that a minimum of 250 hairnets should be disposed of daily and if only 5% of hairnets are flushed through toilets,

which would be more than enough to account for the number of hairnets found in the downstream sewer. Company managers acknowledged that it's possible some of their employees are continuing to flush hairnets and agreed to again instruct them not to do this. The managers agreed to post signs at all restrooms, in English and Spanish, to not flush hairnets or any other inappropriate materials, such as cleaning rags, into the toilets and drains. Tran then issued another written NOV for discharging waste that causes the sewer to plug. Tran will follow-up to insure the signs are posted.

San Jose Creek West WRP Resin Chunks

On Friday, 3-15-19 at 1000 hours, Superintendent of Treatment Plant Maintenance Thad Chester met with Senior IW Inspectors Peter Carlstrom and Steve Sealy. He stated that San Jose Creek West WRP was receiving large chunks of hardened resin in the influent pumps and tank drains causing the tank drain pumps to be clogged and unable to pump the solids and sludge from the tanks. He stated the material has been coming in for the past couple weeks causing increased maintenance. He is concerned the material has passed through the WRP influent pumps, possibly damaging them.

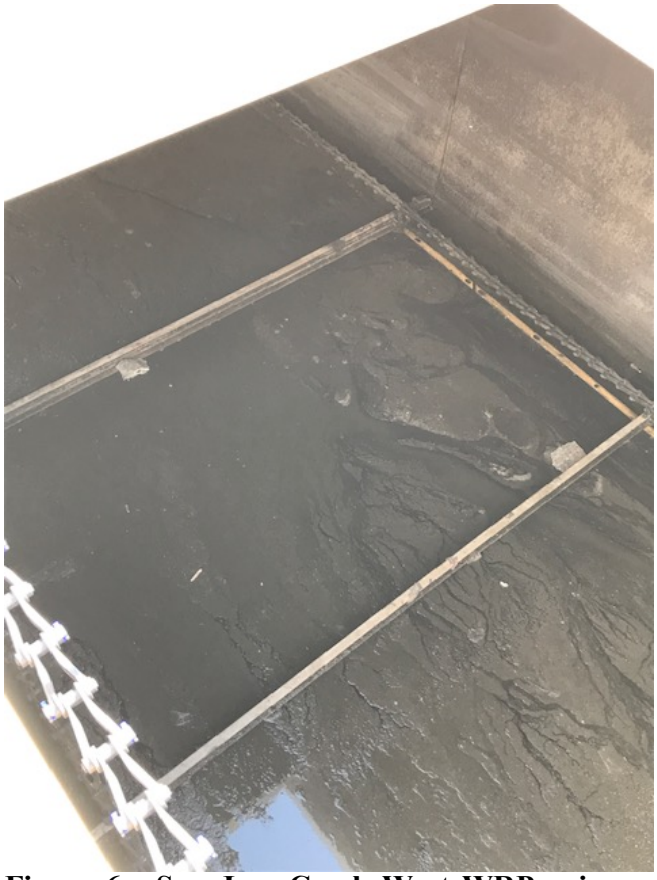

Figure 6: San Jose Creek West WRP primary treatment tank with 2 chunks of the resin material visible floating on the surface.

Figure 7: One of the chunks of resin material after its removal from the San Jose Creek West WRP's primary tank.

Sealy and Carlstrom investigated this report and determined that the resin chunks found in the SJC West WRP influent channels, pumps wells, etc. appear to be from the recent cured-in-place pipe (CIPP) sewer line relining projects along the SJC Interceptor trunk line that is upstream of the WRP. The resin chunks were shown to Districts' field engineering staff and they will pursue further action to determine cause(s) for its appearance at the WRP. No further actions are planned by the Industrial Waste Section staff on this incident at this time.

Fire at the Phillips 66 Oil Refinery in Carson

On Friday, 3-15-19 at 2000 hours, Night Team Senior IW Inspector Kent McIntosh, while conducting a routine inspection in the area, noticed five helicopters flying overhead slightly to the west and a fire truck driving west on Sepulveda Boulevard. During the inspection, he learned from his contact that there had been a fire at a nearby large oil refinery. The contact stated the fire started around 1900 hours. McIntosh notified his Supervisor, Andrew Woods, of the fire report. Woods determined the fire had occurred at the nearby Phillips 66 Refinery.

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

Woods, McIntosh, and Night Team IW Inspector Jose Ruiz met at 2040 hours and they proceeded to JWPCP, the pre-designated emergency monitoring sewer located downstream of the refinery MH 08A0010, and then to the refinery incident command center. They measured a headspace LEL of 24% at the emergency monitoring manhole, which is essentially normal for this location, indicating no explosive materials from the refinery were flowing to the JWPCP. Contacts at the command center stated the fire, which began at 1800 hours, was caused by a pump-seal leak in the crude unit and had been extinguished by 2130 hours. Although refinery managers notified many local regulators and first responders of the fire, no such notification, as is required under their industrial wastewater discharge permit, was made to the Sanitation Districts. Notification is required "immediately," which is defined as being within 15 minutes.

Inspectors noted that as a result of the fire, refinery operators ceased all production operations and discharge of industrial wastewater to the sewer. The firewater and residual process wastewater was being impounded into tank 1646. Some firewater had been diverted into

a storm water pond on-site as well. Contacts initially claimed no foam had been used to control the fire, but an inspection the next day, Saturday, 3-16-19, at the refinery by Team 3 Senior IW Inspector Bill Barnum confirm some foam had been used. This is significant because firefighting foam can interfere with wastewater pretreatment processes designed to remove oil and grease. Ultimately, IW inspectors closely monitored the facility in subsequent days, taking multiple samples of the industrial wastewater discharge, which contained the treated firewater. Field test results (pH, LEL, sulfides) indicated that the wastewater discharged to the sewer met all requirements and limits, though the critical oil and grease test results are still pending.

During his 3-16-19 inspection Barnum issued the refinery a NOV for failing to immediately notify the Sanitation Districts of the 3-15-19 fire. Refinery Shift Supervisor Hugh Vaughn, who was on duty when the fire broke out, stated he was responsible for making the notifications. He initially suggested that no violation had occurred because Districts' inspectors responded without his notification. However, he eventually agreed the requirement for immediate notification was not met and that he should have made a phone call to the Long Beach Main Pumping Plant Alarm Center. It was noted that due to the failure to notify, IW inspectors had not responded to the fire until three hours after the fire had started. Barnum explained to Mr. Vaughn that the notification requirement is in place to allow Districts' staff to quickly evaluate if there are any threats to the collection system and downstream treatment plant so that they can respond accordingly. In this case the delay in response could easily have put the JWPCP in some unnecessary peril. Mr. Vaughn said he understood and signed the NOV without incident.

Long Beach WRP Low pH

On Saturday, 3-16-19 at 1220 hours, Long Beach WRP TPO II Art Lopez called Supervising Industrial Waste Inspector John Boyd and reported that the plant was experiencing low pH influent. He said the pH began decreasing at about 1020 hours, went down to a low of 5.2 within about 30 minutes, stayed at that level for about an hour and a half, and then went back up for 20 minutes, reaching 5.8-5.9 at the time of his call. Lopez said he took a sample of the influent at 1100 hours which he took to the WRP lab where it tested at pH=5.8, about a half unit higher than the influent pH meter had been reading. He said the influent did not have an unusual color or odor. It was unknown at the time of his call whether or not the secondary treatment processes would be impacted as Lopez estimated the current primary treatment retention time is about 3 hours. Boyd notified South Teams' Supervising IW Inspector David Sanchez of the report and he responded to the WRP to follow-up.

Sanchez arrived at Long Beach WRP at 1350 hrs. The grab sample of raw influent collected earlier by operators was field tested by Sanchez for total iron, yielding a result of greater than five ppm, indicating an unusually high iron concentration. A second sample of raw influent was then collected by WRP Laboratory Technician Tracy Tran at 1406 hours, tested for pH (result=5.7; WRP influent meter again reading somewhat lower at 5.53). This sample was also field tested for total iron and found to contain a concentration of between two and five ppm total iron, still unusually high. Both samples were subsequently submitted to the San Jose Creek laboratory for iron analysis.

This incident was ultimately determined by Team 2 IW Inspectors to have been likely caused by an overflow of the WRP's sludge waste line, which contains high concentrations of ferric chloride used in the treatment process, making its way back into the WRP's influent via the Palo Verde trunk sewer at MH 19 0010 (see Figures 8 and 9 below). Ultimately, the incident did not detrimentally impact WRP operations.

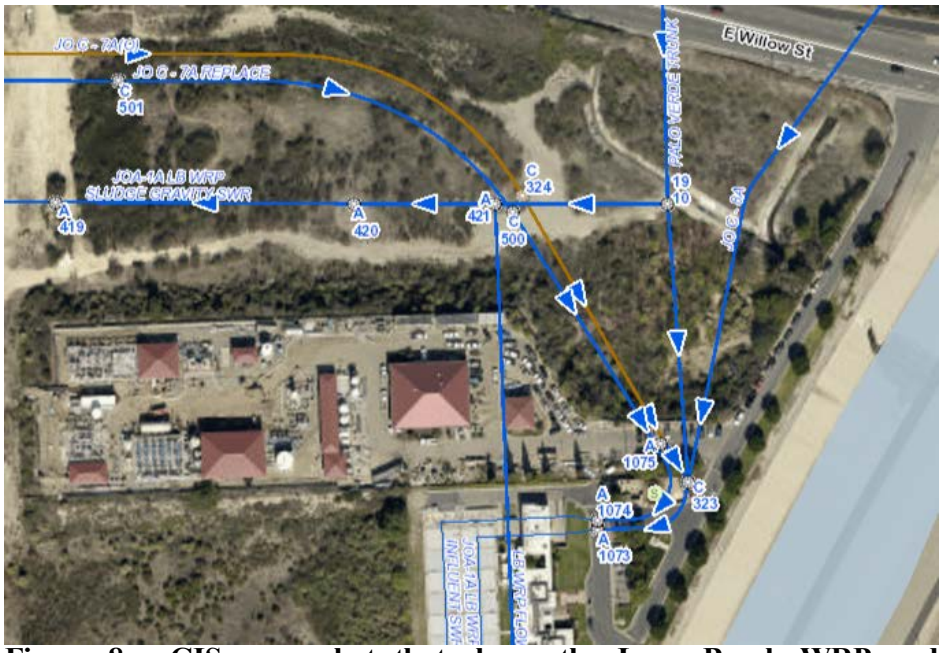

Figure 8: GIS screenshot that shows the Long Beach WRP and upstream lines. Note that the despite the flow direction for the line between MH A421 and MH 19 0010 indicating an east to west flow, IW inspectors verified that flow can and does occasionally flow the other direction causing waste sludge laden wastewater to re-enter the WRP.

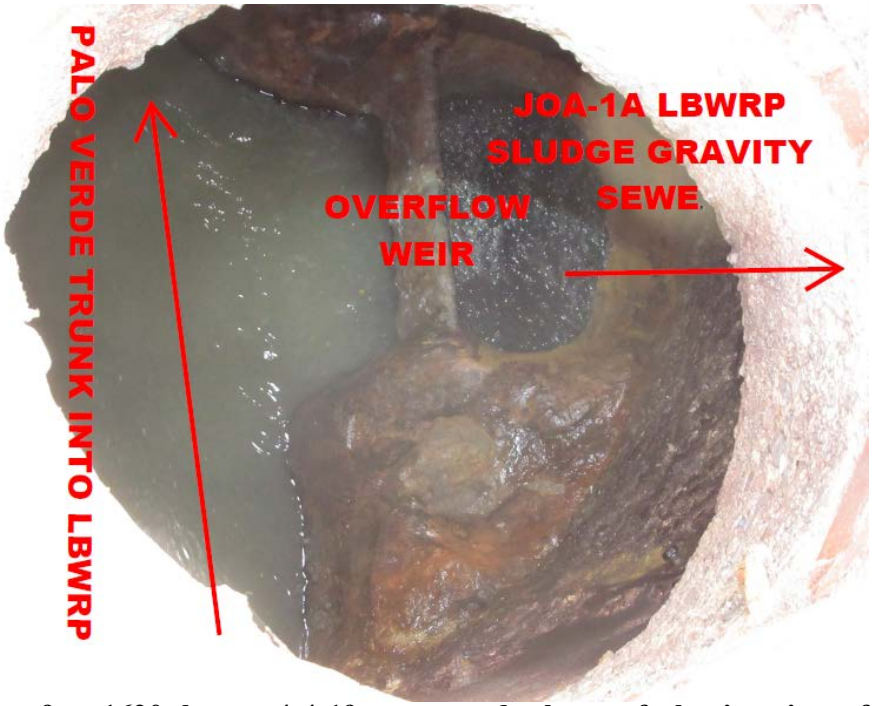

Figure 9: 1620 hours 4-4-19 annotated photo of the interior of MH 19 0010 showing how, at high flow rates, wastewater in the waste sludgeline, can overflow the weir and flow back into the 24" Palo Verde trunk sewer, which then flows back to the WRP.

Los Coyotes WRP White Color and High pH

On Wednesday, 3-20-19 at 0045 hours, Los Coyotes WRP TPO II William Moriarty called Night Team Supervising Industrial Waste Inspector Andrew Woods and reported elevated

pH and white color in the WRP's influent. WRP operators collected a sample of the white-colored, high pH wastewater which was brought back to the lab and confirmed to have a high pH of 8.52. Moriarty stated that he was unaware of the any caustic addition or crown spray activity scheduled for that day upstream of the WRP that could have caused the incident. However, further checking of scheduled crown spray activity by the IW inspectors revealed that there was crown spraying activity upstream of the plant beginning at 2200 hours that day. Thus the high pH and white color were attributed to the crown spray work conducted in upstream sewer reaches that day. No further action by the inspection staff was conducted on this incident. Note that the crown spraying activity that caused this incident was being conducted late at night due to the need to access sewer line manholes in high traffic areas difficult to access during daylight and early evening hours.

Milky Wastewater Spill at the Ninth Avenue Dairy in the City of Industry

On Wednesday, 3-27-19 at 1026 hours, Mr. Peter Ulloa, the Maintenance Manager at Heritage Distribution Co. DBA Ninth Avenue Foods in the City of Industry called the Long Beach Main Pumping Plant Alarm Center and spoke to Operator Don Reyes. Ulloa later claimed that he reported that they had just had a spill/overflow of milk laden wastewater that was flowing off-site into the street storm drain. However, Reyes interpreted Ulloa's statements to be that there was on ongoing sewer system overflow (SSO) and instead of referring the call to Supervising IW Inspector John Boyd, he activated the Districts' SSO response team of Districts' sewer maintenance personnel, who responded to the site. Fortunately, Boyd was copied on the SSO response team email and he also notified Area and Senior IW Inspector Peter Carlstrom, who responded to the site. The email Boyd received concerning the spill only indicated the location as the intersection of Proctor Street and Ninth Avenue, so Boyd thought the most likely source of the spill was the adjacent Cacique Cheese Company (IW#10898), which turned out to be false. Fortunately, Carlstrom was able to quickly determine the spill source was actually the Ninth Street Dairy.

Heritage Distribution Co Inc. dba Ninth Street Dairy IW 21681 35,000 GPD
425 S. 9th Avenue
City of Industry, CA 91746

Carlstrom responded to report of possible SSO at Ninth and Proctor Avenues in City of Industry on 3-27-19, arriving on-site at 1100 hours. He did not see any other Sanitation Districts' employees as they apparently quickly had determined there was no SSO. Carlstrom did however meet an L.A. County Department of Public Works employee who was on-site responding to the milky water in the storm drain. Carlstrom learned from him the milky wastewater had originated at Heritage Distribution Co Inc. dba Ninth Street Dairy and went there to investigate further. The spill was caused by the failure of a pipe flange in the milk silo room during routine clean-in-place (CIP) operations. Most of the reported 200 gallon spill was collected and discharged to the treatment system and sanitary sewer, but since it was of similar quality to normal wastewater it did not cause an impact downstream. Some of the material did make it outside through a doorway and ended up in the storm drain where workers cleaned it up. The company notified the proper agencies including the Sanitation Districts and the Los Angeles County Department of Public Works in a timely fashion and brought in Blue Ocean Environmental to commence further downstream cleanup in the storm drain system, including some in San Jose Creek.

Peter Ulloa subsequently requested and was later granted permission by Supervising IW Inspector John Boyd to discharge 21,000 gallons of mixed milky wastewater and cleanup water from the cleanup of about 1,600 feet of storm drain and flood control channel (i.e., San Jose Creek), subject to discharge permit limits. The company completed this discharge on 3-29-19 with no evidence that either the initial spill or discharge of the cleanup water had any negative impact(s) on Districts' collection system or the downstream WRP (San Jose Creek East).

Figure 10: Location of the pipe flange failure in the milk silo room at the Ninth Street Dairy that caused the spill.

Figure 11: Two 20,000-gallon capacity 'frac" tanks used to hold the spilled wastewater and associated cleanup water. Note San Jose Creek in the background.

Figure 12: Ocean Blue Environmental vacuum truck used to haul the stored wastewater in the frac tanks back to the Ninth Street Dairy facility for discharge to the sewer after approval was gained from the Districts to do this.

INDUSTRIAL WASTE SECTION
SUMMARY OF ACTIVITIES
FOR THE MONTH OF APRIL 2019

TREATMENT PLANT/SEWER/OTHER INCIDENT INVESTIGATIONS

High pH at WWF Operating Company in the City of Industry

On Wednesday, 4-17-19 at 2050 hours, Long Beach Main Pumping Plant Alarm Center Operator Don Reyes called Night Inspection Team Supervising IW Inspector Andrew Woods and reported he's just received a call from "Steve" from the "City of Industry" requesting to discharge high pH wastewater to the sewer. Woods telephoned "Steve" using the telephone number he had provided to Reyes. The number belonged to Steven Correa, Chief Operator of Montrose Environmental Group, the contractor which operates the industrial wastewater pretreatment system on behalf of WWF Operating Company, a large dairy product processing and bottling facility in the City of Industry. Correa stated that the company was currently discharging wastewater with a pH of 12.37 through their outfall but might discharge even higher pH wastewater in the approaching hours. Woods reminded Correa that any discharges above 12.5 were technically prohibited as any such waste is defined by state law as being hazardous, and as such can't be discharged into the sanitary sewer system. Woods noted this facility has a 5-minute peak flow limit of 667 gpm and that their discharge flows to the San Jose Creek East WRP.

WWF Operating Company IW22071 500,000 GPD
18275 Arenth Avenue
City of Industry, CA 91748

Night Team Senior IW Inspector Kent McIntosh and Inspector Jose Ruiz followed-up on the call, arriving on site at WWF Operating Company at 2140 hours on 4-17-19, where they met with Correa. Although no operators had been on site when the high-pH discharge began, Correa stated he had been remotely notified by an automatic call system at about 1800 hours of a rising pH in the final effluent (see Figure 1). He said the final effluent pH monitor alarms at pH=11.50. A check of the effluent pH upon arrival found the pH at 12.39. Operators were actively allowing the pretreatment system acid addition pumps to pump at their maximum addition rate to neutralize the wastewater. The high pH incident was caused by a combination of, for unknown reasons, sanitation shift workers using the wrong a cleaning solution in the Clean-In-Place process and a valve getting stuck open. The company is investigating why the wrong solution, which was more concentrated than the one that should have been used, was used instead.

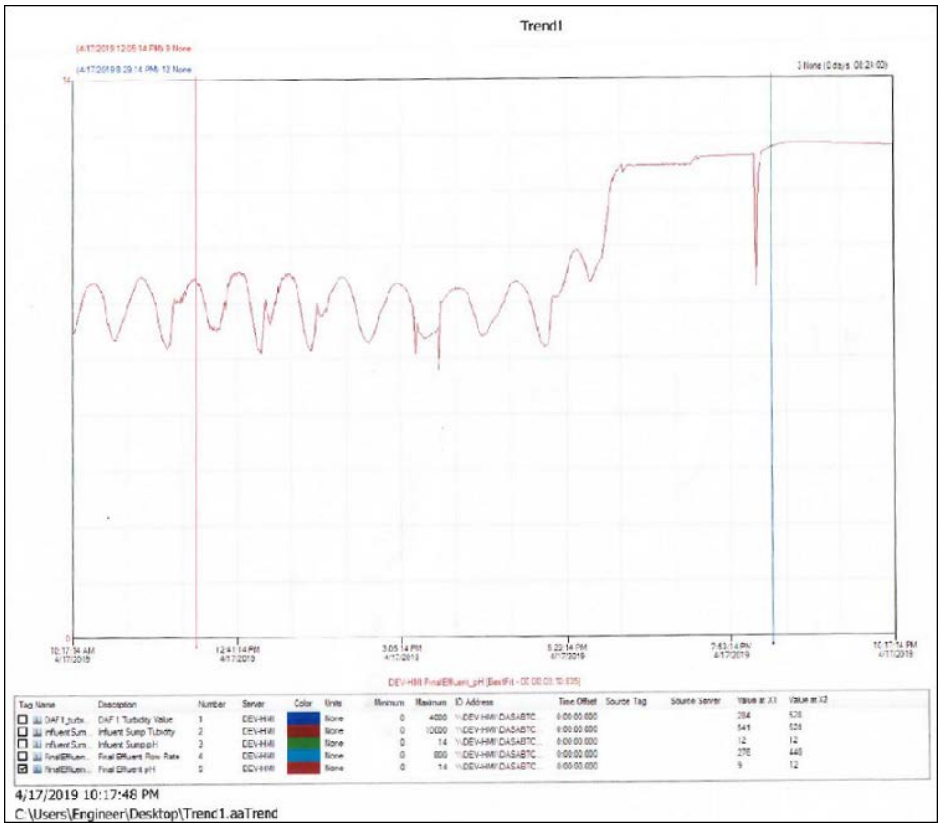

Figure 1: Final Effluent pH trend at WWF Operating Company on 4-17-19.

Company operators were able to quickly fix the stuck valve, remove the wrong cleaning solution from use, and prevent the final effluent pH from going above 12.5. The incident had no known adverse effects on either the downstream collection system or Districts' treatment plant (San Jose Creek East WRP) operations. No enforcement action was taken against the company.

Fire at Trojan Battery Company Inc. in Santa Fe Springs

On Monday, 4-22-19 at about 0730 hours, South Teams' Supervising IW Inspector David Sanchez observed a California State Office of Emergency Services (OES) spill report on their website for an electrical fire that occurred at Trojan Battery Company in Santa Fe Springs on Friday, 4-19-19 at about 1800 hours. The report indicated that firewater contaminated with sulfuric acid (i.e., battery acid) had been generated and impounded onsite.

Trojan Battery Company, Inc. IW 9401 7600 GPD
12380 Clark Street
Santa Fe Springs, CA 90670

Area IW Inspector James McCurdy followed-up on this report, arriving on site at Trojan Battery Company at 1010 hours on 4-22-19. The company manufactures deep-cycle, lead-acid batteries and their industrial wastewater discharge is subject to Federal Categorical Standards under 40 CFR 461, subpart C. The company contact, Environmental Manager Isabel Carvajal, stated that the top shelves of a single storage rack had indeed caught fire and activated the fire suppression system. These racks are used to apply an initial voltage to newly-manufactured batteries and generate the initial charge. The reaction releases heat under an exothermic reaction. It is currently not understood why the reaction caused a fire in this case but the company was investigating. The fire appeared to be minimal, causing no visible damage to the building. Sprinkler water that contacted the floor gravity fed into nearby sumps and was pumped into the company's treatment system. According to the treatment and discharge logs, the additional "firewater" was treated but was held in Tank 4, which is the final holding tank prior to discharge. The company took a sample from tank 4 for analysis of 7 metals (Cd, Cr, Cu, Pb, Ni. Ag, and Zn). McCurdy told the contact,

that if desired, they could contact Supervising IW Inspector John Boyd to request permission to discharge the firewater under a one-time approval assuming the water met all applicable limits, or alternatively, haul it away to a licensed centralized waste treatment facility for disposal.

On 4-24-19 after receiving an email request from Carvajal that included sampling results indicating the impounded firewater met all applicable limits, Boyd issued the company a 1-time approval for the company to discharge 2500 gallons of impounded firewater that had been treated and comingled with 500 gallons of normal process wastewater in the company's IW discharge tank. The approval allowed the discharge to commence at 1700 hours that same day. Districts' Night team inspectors Jose Ruiz and Carley Craig were made aware of the discharge and were onsite to observe and sample it. Those sample test results are pending, but visually everything appeared to be in order at the time of their inspection.

Excessive Ragging in a J.O. 'H' Unit 5C Trunk Sewer Siphon in El Monte

On Friday, 4-19-19 at 1100 hours, Coordinating IW Inspector Tingting Wei received a call from San Gabriel Valley Field Office Supervisor of Sewer Maintenance Bill Balas regarding "rags" found at the 30" diameter, unusually long, 735' siphon structure on J.O. 'H' unit 5C between manholes H 0470 and H 0469 in El Monte where the line crosses under the San Gabriel River (see Figure 2). The normal volume of flow into the siphon is very low as the tributary area is small and essentially entirely residential in nature, with about 100 homes in the area. Note that a bulkhead is installed upstream at Manhole (MH) 0475 which effectively limits the flow into the siphon to the residential area that discharges into the local sewer lines shown in yellow in Figure 2. Balas stated the rags being encountered have been present for 10+years and were, in his opinion, not flushable wipes, having more of a "felt-like" texture. He said he had saved a pile of the rags at the San Gabriel Field Office (see Figure 3) and was notifying the Industrial Waste Section now of this situation because he felt it was getting worse. He was hopeful an industrial source for the rags could be identified and controlled.

Figure 2: GIS influent area map. The sewer lines influent to the H470-H469 siphon structure are colored yellow.

Figure 3: Rags removed from MH H469 in April 2019.

Balas stated that the siphon structure is currently cleaned quarterly using hydrojetting. Hydrojetting is necessary, as opposed to the simpler method of using a bag, due to the presence of the rags. Balas stated that in the past the cleaning was only needed annually, but now, due to an increase in the amount of rags, it had to be done more frequently.

An investigation into this report, led by Senior IW Inspector Steve Sealy, included a close examination of the rags. Sealy concluded the rags are non-woven wipes (see Figure 4). Sealy concluded the wipes are not from an industrial source but from the residential area upstream of MH H469. No further action from the inspection staff on this issue is anticipated at this time.

Figure 4: Comparison of a rag from MH H469 (on the left after being cleaned-up a bit) and a rag removed recently from the Long Beach WRP headworks.

INDUSTRIAL WASTE SECTION
SUMMARY OF ACTIVITIES
FOR THE MONTH OF MAY 2019

TREATMENT PLANT/SEWER/OTHER INCIDENT INVESTIGATIONS

Fire at the Phillips 66 Carson Oil Refinery

On Thursday, 5-2-19 at 1730 hours, Supervising Industrial Waste Inspector John Boyd called Night Team Supervising IW Inspector Andrew Woods to convey news reports of a large oil refinery fire at the Phillips 66 facility in Carson. At approximately 1745 hours, Long Beach Main Pumping Plant Alarm Center Senior Pumping Plant Operator Ken Hartnett called Woods to report that the Carson Phillips 66 refinery had notified him of a fire at their facility. Such notification is required "immediately" as a requirement of the industrial wastewater permit issued by the Districts to the refinery.

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

Woods, and Night Team Senior IW Inspector Kent McIntosh, as well as Inspectors Jose Ruiz and Carley Craig responded to the fire notification, arriving on-site at the refinery at 1754 hours after quickly checking Districts' manholes downstream of the refinery for possible impacts to the sewer from the fire. No such impacts, including elevated explosivity were noted. Upon arrival Districts' inspectors contacted the L.A. County Fire Department Incident Commander and also spoke to the refinery's Environmental Compliance Specialist, Mr. Alphonso Graves. Graves stated that the fire, which had been extinguished by 1745 hours, had started at 1643 hours and was caused by a "light gas release" due to leaky pump in the coker unit. Graves stated that the fire had been suppressed with a "small amount" of foam and extinguished with water. The refinery was in full operation prior to the fire. Refinery operators ceased all industrial wastewater discharge from the facility to the sewer at 1745 hours to insure no wastewater that might negatively affect the sewer system could be released. Districts' IW Inspectors found no evidence that the fire affected the sewer or caused any effluent limit or requirement violations.

Further follow-up inspections conducted later that evening, and in following days and evenings by the Night Team inspectors, Team 3 Senior IW Inspector Bill Barnum, and Area IW Inspector Chris Mendoza found that normal IW discharge had resumed at midnight, about 6 hours after the fire. The firewater from this incident was eventually comingled with normal refinery process wastewater, treated, and discharged to the sewer as is allowed in their discharge permit. There were no known negative impacts on either the sewer system or the downstream Districts' treatment facility, JWPCP, from this incident.

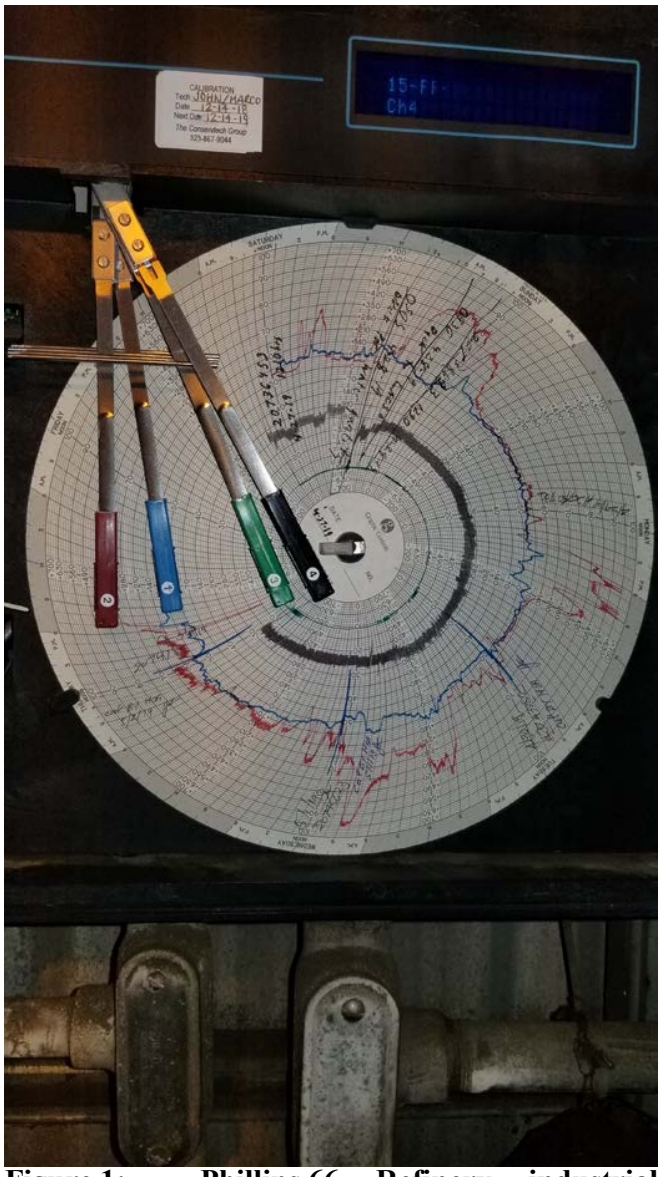

Figure 1: Phillips 66 Refinery industrial wastewater effluent monitoring chart recorder. The one-week circular chart was installed on 4-27-19 and recorded the IW flow shut down due to the 5-2-19, 1645 hours fire. Note pen #4 with the black ink trace on the chart, this is the flow recorder trace.

Fire at Master Recycling Center in Pomona

On Friday, 5-3-19 at 1600 hours, Supervising IW Inspector Andrew Woods received a call from IW Inspector Greg Neunsinger conveying news reports about an active large fire at Master Recycling Center in Pomona. Master Recycling Center is a relatively large, permitted industrial wastewater discharger that discharges off-spec and out-of-date beverages to the sewer. Beverages typically discharged include beer and wine, sodas, and juices. Discharges from this facility are known to have the ability to impact the downstream Pomona WRP, as such Woods decided to have Night Team inspectors follow-up on the report immediately.

Master Recycling Center IW 17014 8000 GPD
1980 S. Reservoir St.
Pomona, CA 91766

Woods and Night Team Inspectors Jose Ruiz and Carley Craig arrived at Master Recycling Center at 1727 hours. They met with the Incident Commander, L.A. County Fire Department Battalion Chief Mike Padilla, and the owner of Master Recycling Center, Bill Nazaroff. At the time of their arrival the fire was still ongoing (see Figures 2 and 3). The fire was eventually extinguished about 2 hours later. The fire was confined to outside storage areas (see Figure 4) and an ancillary building not related to the production operations and not close to the industrial wastewater generating operations, wastewater storage tanks, and sampling point. Ultimately, through multiple follow-up inspections both by Night and Day Team inspectors, led by Woods and Area IW Inspector Nguyen Dang, it was determined that the incident, while large in scope, did not impact the sewer system or affect Districts' downstream sewers or the Pomona WRP. Essentially all of the firefighting water generated during the fire flowed to the County storm drain system and there was no known attempt to recover it. The cause of the fire remains unclear.

Late on 5-3-19 Mr. Nazaroff did contact Woods about the possibility of obtaining permission from the Districts to discharge an unspecified amount of remaining ponded firewater to the sewer. However, according to later statements by Nazaroff, his employees, without his permission, disposed of it on Saturday, May 4th, by discharging it off-site into the storm drain. This information was forwarded by Woods to Supervising IW Inspector John Boyd who reported it the Los Angeles Regional Water Quality Control Board. The LARWQCB is following up on the report and will take enforcement action against Master Recycling Center if they determine it's warranted.

Figure 2: 5-3-19 photo of fire trucks on-site at Master Recycling Center. Note the ongoing flow of firewater from the site going to the storm drain.

Figure 3: 5-3-19 photo of the ongoing fire. Note the firefighter and rising smoke. Also note the copious amounts of ponded water from fighting the fire.

Figure 4: 5-7-19 photo of the fire aftermath at Master Recycling Center.

Pomona WRP White Foam

On Thursday, 5-23-19 at 0805 hours, Pomona WRP Supervising TPO Charlie Arellano called Supervising IW Inspector John Boyd and reported that at 0715 hours that morning during normal plant rounds operators had noticed white foam and a light petroleum-like odor at channels 6 and 7. This location essentially represents the final effluent just before it leaves the plant. Arellano took samples of the wastewater in the channel and the foam. Arellano stated that

the plant had been having some foaming issues recently, with heavy foaming present in the secondary aeration tanks, but that that foam was not white and more the normal type of biological foam typically present there. Arellano stated that at the time of his call there was no white foam in the aeration tanks and that he estimated the material which caused the white foam would have had to have entered the plant 6-7 hours prior to its being present in channels 6 and 7. This indicates the white foam causing material would have entered the plant sometime around midnight to 0100 hours earlier that morning. This information was forwarded to North Teams' Supervising IW Inspector Andy Woods, who coordinated the follow-up investigation.

Upon hearing the nature of the incident Woods remembered a conversation he'd had during a recent inspection at Master Recycling Center (see incident above) in which the owner, Bill Nazaroff, had stated that his company was in possession of multiple tanks of off-spec car washing soap solution used at automated car washes. The question of how and whether the company could dispose of this material to the sewer had come up, with Woods stating that disposing of them directly would likely not be allowed due to the potential to cause foaming in the downstream sewers and WRP. However, their use in limited quantities at any given time as cleaning solution in the company's production areas, for things such as washing down floors, would be acceptable. Recalling this conversation, Woods directed that Team 1 IW Inspectors inspect Master Recycling Center as a possible source for the incident.

Team 1 Inspectors subsequently inspected several possible sources for this incident including Master Recycling Center. The inspection at Master recycling Center, conducted by Area IW Inspector Nguyen Dang and Senior IW Inspector Peter Carlstrom found strong evidence that the company was the source of the foaming at the WRP. They noted several empty 250-gallon intermediate bulk containers (IBCs) labeled as having contained car wash soap. Inspection of the facility later found approximately 40 similar containers of this material. Company operators admitted to Carlstrom and Dang that the previous evening they had disposed the contents of the empty IBCs to the sewer as part of four 2500-gallon tanks of combined wastewater and liquids generated from crushing off-spec and out-of-date beverages on 5-22-19. This same approximate volume of discharge (10,800 gallons) was also verified by annotation of the company's required discharge logs where flow meter totalizer readings were recorded by company operators on 5-22-19.

Master Recycling Center IW 17014 8000 GPD
1980 S. Reservoir St.
Pomona, CA 91766

Master Recycling Center was issued a written Notice of Violation for causing the foaming incident at the Pomona WRP and ordered to cease the discharge of any similar foam causing materials and waste. After review of the incident and its impact on the WRP's receiving waters, on 5-29-19 the Districts' Reuse and Compliance Section managers determined that this incident resulted in a pass-through NPDES permit violation on 5-23-19. Industrial Waste Section managers, in conjunction with Districts' legal staff, are evaluating whether or not to take further legal action against the company for causing this incident.

Figure 5: White foam at the Pomona WRP effluent discharge point into San Jose Creek at 0915 hours on 5-23-19.

Figure 6: 5-23-19 photo at Master Recycling Center in their main processing area of one empty and one partially full (about 1/3) IBC labeled as "carwash soap."

Figure 7: 5-23-19 photo of the warehouse at Master Recycling Center where approximately 40 IBCs labeled as carwash soap or similar were found. The figure in the photo is LACSD IW Inspector Nguyen Dang.

Acid Spill at KIK SoCal in Santa Fe Springs

On Tuesday, 5-28-19 at 1450 hours, Districts' Technical Services Department Head Martha Tremblay received an email from Razel Trigilio, Environmental Scientist with the California State Department of Toxic Substances Control (DTSC). The email included attachments and information regarding a referral/complaint from a South Coast Air Quality Management District (SCAQMD) Supervising Inspector, Mr. Mark VonDerAu. VonDerAu reported to DTSC that according to a report he'd received from an unnamed City of Santa Fe Springs Fire Department Captain, on Friday, 5-24-19 at 0745 hours KIK SoCal, Inc. was transferring a 55-gallon drum of 70% acetic acid solution into another storage container when approximately 20 gallons of it spilled into a containment area that had 8000-10,000 gallons of wastewater in it. This wastewater was being held prior to it being treated and reused into product on-site. The acetic acid mixed with the wastewater, and according to the Fire Department, potentially created a "chlorine gas cloud." The referral makes no further mention of any actions taken by the Fire Department, AQMD, or the DTSC in response to the incident, but implies that the Sanitation Districts is being notified in case they are unaware of the incident or the fact that the company is now reusing their industrial wastewater instead of sewering it.

KIK SoCal Inc. IW 15431 15,000 GPD
9028 Dice Road
Santa Fe Springs, CA 90670

Area IW Inspector James McCurdy followed-up on this report, arriving on-site at KIK SoCal Inc. at 1315 hours on 5-29-19. His inspection determined that the spill in question had been reported properly to authorities and that it had not impacted any sewers. Although it was noted that the Districts had not been notified of the spill, the company's permit only requires such notification when the event either does, or its anticipated will, impact the discharge to the sewer or the sewer system. In this case neither was true, so no notification was made. The Districts is well aware of KIK's ongoing efforts to achieve greatly reduced or "zero discharge" of industrial wastewater to the sewer. They are making this effort because they have been largely unsuccessful in their ability to comply with Districts' imposed chloride concentration limits. The company's last documented industrial wastewater discharge to the sewer occurred on 10-31-18. McCurdy further noted that the company appeared to have taken appropriate corrective actions to mitigate any impacts from the spill and has corrected the physical cause of the spill, which was a failed hose connection. McCurdy also determined that based on the chemicals that spilled and mixed together there was essentially no chance or threat of a "chlorine gas cloud" having resulted from the incident. No further action on this referral by the Districts is anticipated.

Los Coyotes WRP Brown Color

On Thursday, 5-30-19 at 0630 hours, Los Coyotes WRP TPO II Will Moriarty notified IW Inspector Lanae Turner that operators had observed a light brown color in the WRP final effluent (forebay). Operators subsequently collected samples of the primary effluent, secondary effluent, and final effluent which were given to the IW inspection staff for possible analysis. Operators noted that color had not been observed at the forebay earlier that day at 0530 hours, but as noted above was observed about an hour later. It was estimated that the color causing material likely entered the WRP about 8 hours prior to its being observed at the forebay.

Team 2 Senior IW Inspector Jim Percy coordinated the investigation into this incident. It was noted that due to an ongoing project at the Los Coyotes WRP to replace the Stage 2 return activated sludge (RAS) line the WRP was taking in significantly less flow than normal on 5-30-19 with plant flows reduced by about 10 MGD below the normal 30 MGD due to the project and previously scheduled diffuser cleaning. This approximately 50% reduction in flow is likely causing the WRP to be more susceptible to color incidents as the two main upstream industrial sources for color discharges, the Shaw carpet mill and Tri-Star fabric dyeing operation, both have permit dilution color limits determined by calculating the normal percentage of flow into the WRP that their flows represent. Both dischargers' flows remain influent to the WRP as the reduction in the WRP influent rate is being accomplished by diverting other sewers normally influent to the plant, not the sewers containing the flows from Shaw and Tri-Star.

Shaw Diversified Services, Inc. 15305 Valley View Ave. Santa Fe Springs, CA 90670	IW 15869	600,000 GPD
Tri-Star Dyeing and Finishing 15125 Marquardt Ave. Santa Fe Springs, CA 90670	IW 17196	450,000 GPD

Ultimately, IW inspectors determined that the Shaw facility was the likely source of the color found in the WRP forebay on 5-30-19, but they also determined that the facility had not violated their 20:1 color dilution limit. As such, the company was not cited and instead advised of the current situation at the WRP and requested to reduce their color discharges as much as possible to help prevent recurrences of this type of incident. IW Section staff is currently evaluating whether or not to attempt to modify the permit limits imposed upon Shaw and Tri-Star for the period of the RAS line project work at the WRP, which is not scheduled to be completed until early November 2019. No NPDES violations occurred as a result of this incident.

INDUSTRIAL WASTE SECTION
SUMMARY OF ACTIVITIES
FOR THE MONTH OF JUNE 2019

TREATMENT PLANT/SEWER/OTHER INCIDENT INVESTIGATIONS

Fire at Kinder Morgan in Carson

On Monday, 6-3-19 at 0530 hours, Team Senior IW Inspector Bill Barnum noted morning news reports of an ongoing large fire at the Kinder Morgan Energy Partner Facility located on Sepulveda Boulevard in Carson. He forwarded this information to area IW Inspector Chris Mendoza for follow-up. Mendoza then saw ongoing local TV news station reports showing photos and video of a fire in the loading rack at the facility's tank farm with a high volume of firefighting foam on the ground and the loading rack area (see Figure 1). He noted the facility had not, as of 0700 hours, notified the Districts of the fire and a check with JWPCP operators revealed the plant was not experiencing any unusual conditions. JWPCP is the Districts' treatment facility downstream from the Kinder Morgan Facility.

Kinder Morgan Energy Partners, L.P. IW 15837 246,000 GPD
2000 E. Sepulveda Boulevard
Carson, CA 90810

Figure 1: KABC 7 local news report picture of the truck loading rack fire at the Kinder Morgan Facility fire in Carson on 6-3-19.

Figure 2: Close-up photo of the loading dock area and destroyed tanker trucks after the fire had been extinguished on 6-3-19.

This Kinder Morgan Facility receives, stores, and dispenses gasoline and other petroleum fuel products to customers. In addition to the large tank farm on-site, there is also a groundwater remediation facility that extracts, treats, and discharges to the sewer contaminated groundwater from 12 extraction wells on-site. The discharge to the sewer is from two distinct sources:

1. The groundwater remediation facility. Discharge from this part of the facility operation occurs daily and constitutes the great majority of the facility's discharge to the sewer.
2. Storm water and treated wastewater from the fuels area such as tank draws, pipeline hydrostatic testing water, and boiler blowdown. This storm water and wastewater from the fuels storage area is treated and discharged to the sewer only once or twice per year.

Mendoza arrived on-site at the Kinder Morgan Facility at 1000 hours on 6-3-19. Prior to going to the facility, he checked downstream Districts' trunk sewer manholes for evidence of firewater and/or elevated explosivity conditions in the sewers which could be caused by fuel from the Kinder Morgan Facility getting into the sewer, but he found no evidence for either. His inspection at Kinder Morgan found that the fire, which occurred when a tanker truck loading jet fuel at their fuel loading rack caught fire, had been extinguished using copious amounts of firewater and aqueous firefighting foam (AFFF). There was no evidence found that any of this material had been discharged to the sewer system. Company managers stated that almost all the water and foam used to put out the fire had all been impounded on-site in a large storm water holding pond. Ultimately, company managers opted to haul off all approximately 200,000 gallons of the fire-related wastewater for disposal to Demenno Kerdoon (DBA World Oil Recycling) in Compton, a licensed centralized waste treatment facility. Mendoza verified this by reviewing waste manifests for the hauling operations. Ultimately, the fire had no known impact on Districts' systems or operations. The cause of the fire remains under investigation.

<u>JWPCP Elevated Explosivity at the J.O. 'A' and 'B' Headworks</u>

On Tuesday, 6-4-19 at 1000 hours, Supervising IW Inspector David Sanchez called Senior IW Inspector Bill Barnum to forward a report from JWPCP TPO II Nick Atilano that the plant has been experiencing elevated explosivity (LEL) at the J.O. 'A' and J.O. 'B' headworks. LEL sensors were measuring 11% and 19%, respectively.

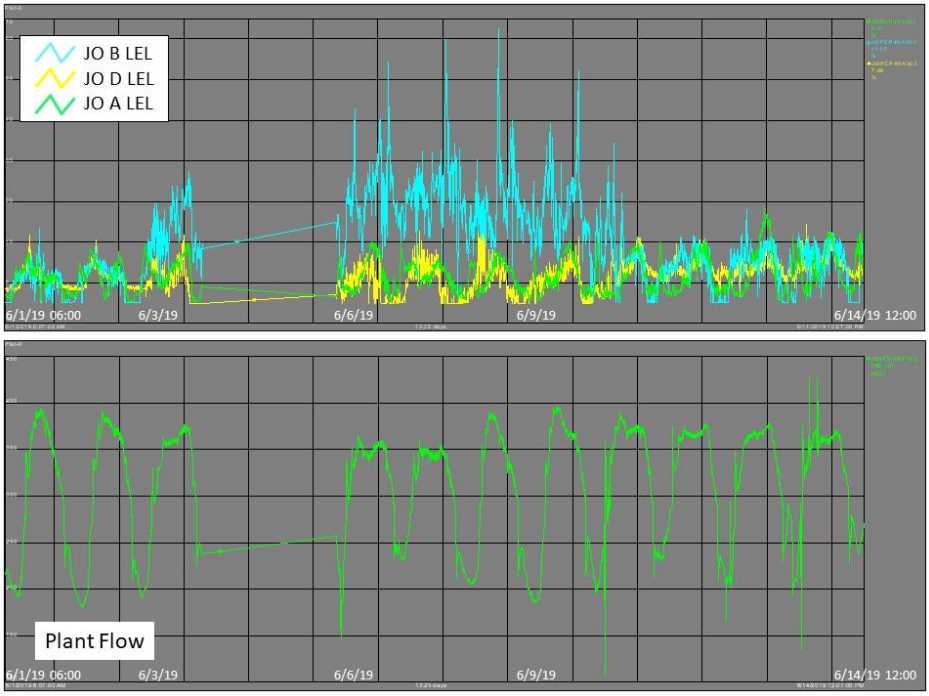

Figure 3: JWPCP Plant Headworks LEL and flow trends 6/1/19-6/14/19. Note that the J.O. 'B' high LEL returned to "normal" levels on 6-11-19 after appearing to be elevated for about a week. The cause of the elevation remains unclear, but it did not affect treatment plant operations.

Industrial waste inspectors were unable to confirm elevated explosivity conditions (LEL) at the J.O. 'A' inlet to the headworks but were able to confirm there was elevated explosivity at the J.O. 'B' headworks that had been occurring since Monday, 6-3-19 (see Figure 3). The report of 11% LEL at the J.O. 'A' inlet at 1000 hours on 6-4-19 fits within normal trends for this location. It is known that the J.O. 'B' inlet can trend higher for LEL especially when the temperatures increase in the summer months. Inspectors detected no significant concentrations of volatile organic compounds in a J.O. 'B' inlet headspace gas sample taken on 6-4-19 using a hand-held photo ionization detector (PID) unit. A simultaneous measurement of 1.09% methane by volume of air using a portable flame ionization detector confirmed the 22% LEL measured on 6-4-19 at 1305 hours was essentially all due to methane, indicating the explosivity wasn't from an industrial source. According to JWPCP operators, there was no disruption in the odor control system, but grit chamber #3 was taken out of service on Monday, 6-3-19, coinciding with the upward trend in LEL at the J.O. 'B' inlet. The treatment plant, including the secondary reactors, continued to operate normally despite the elevated LEL condition. It is known that the lower reaches of the J.O. 'B' sewer just upstream of the JWPCP is typically high in biogenic methane. IW inspectors continue to monitor this situation.

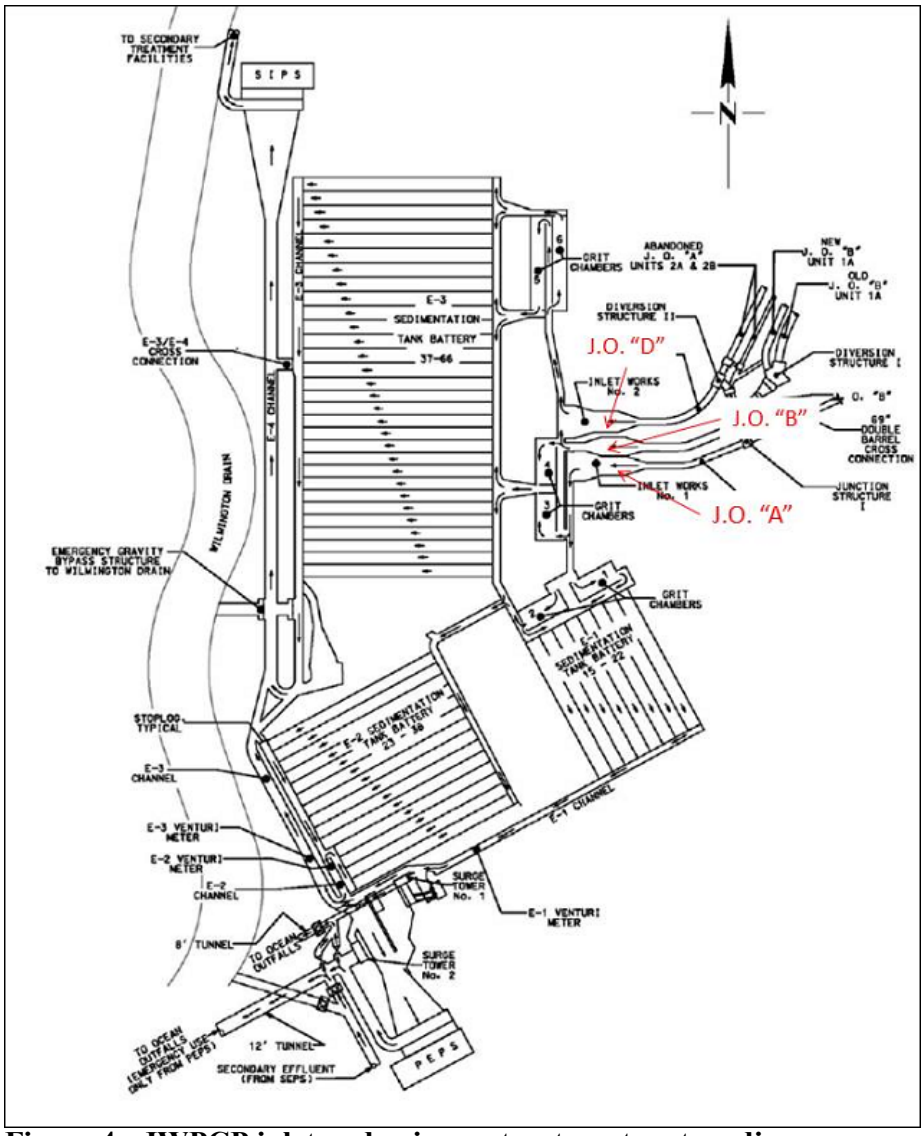

Figure 4: JWPCP inlet and primary treatment system diagram.

Whey Spill at Los Altos Foods in the City of Industry

On Thursday, 6-6-19 at 1113 hours, Senior Pumping Plant Operator Ken Hartnett of the Districts' Long Beach Main Pumping Plant Alarm Center called Supervising IW Inspector John Boyd. Hartnett reported that he'd just received a call from Ms. Alin Andrade, Vice President of Operations at Los Altos Foods in the City of Industry. Andrade reported that at 0930 hours that morning the company had lost 4,000-6,000 gallons of whey solution to the sewer due to a broken valve on a whey holding tank. She stated that a delivery truck had accidently backed into the valve structure on the tank, breaking it, causing the spill. At 1125 hours Boyd called Andrade back to acknowledge her call and gather further information. Andrade stated she had not been on-site when the spill occurred and was only made aware of it when she arrived on-site at 1100 hours. Boyd told her that although he appreciated the notification, in cases such as this where the facility is not very far upstream of the Districts' downstream treatment plant (San Jose Creek East WRP in this case), notification needs to be made as quickly as possible to enable Districts' staff to respond quickly to prevent or mitigate any adverse effects the material could have on the WRP. Andrade acknowledged the need for timely notification and said they would be making sure their staff know this and make timely notification in the future.

Los Altos Foods IW 20197 75,000 GPD
450 N. Baldwin Park Blvd.
City of Industry, CA 91746

At 1127 hours on 6-6-19 Boyd notified San Jose Creek East WRP Supervising TPO Courtney Clark of the spill at Los Altos Foods earlier that morning. Clark said WRP operators would be on the alert and would adjust operations as needed.

Senior IW Inspector Peter Carlstrom responded to the spill report, arriving on-site at Los Altos Foods at 1220 hours. The company manufactures various fresh Mexican style soft cheeses and creams from whole milk. During the manufacturing process curd is separated from whey and used to make cheese. The whey is a byproduct with value as animal feed or it can be turned into protein powder for human consumption. Whey is thus stored in silos and hauled daily to others for use or further processing. One whey silo with 17,000-gallon capacity, located on the east end of loading dock, is used to store whey hauled to an animal farm. The contact confirmed that around 0930 hours that morning a truck was backing in for pickup and ran over a pipe at the bottom of tank, breaking it off above the shutoff valve. With the loss of the valve, operators were unable to stop the resulting spill, resulting in the loss of the 6,000 gallons in the tank to the sewer through an adjacent drain. By the time Carlstrom arrived, the pipe and valve had already been repaired and operations were back to normal. He noted that although the company had a slug discharge control plan in place designed to prevent such a catastrophic discharge to the sewer, the plan included a diversion valve and pumping system that also failed when operators tried to use it to send the spilled material to a 33,000-gallon "calamity" holding tank (see Figure 5). To prevent a similar event in future, the company plans to install additional barriers to prevent trucks from backing in too far. Additionally, the diversion valve and pump system will be added to a preventative maintenance check list and tested monthly.

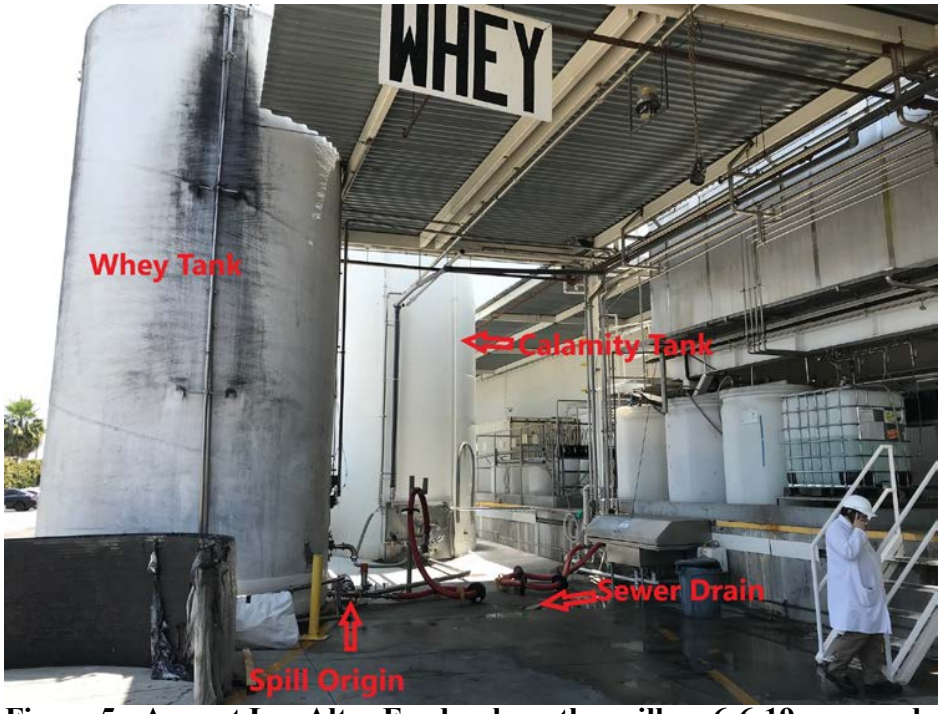

Figure 5: Area at Los Altos Foods where the spill on 6-6-19 occurred.

On 6-7-19 at 0730 hours, Carlstrom spoke with Courtney Clark, who reported that there had been no noticeable effect(s) on WRP operations following the spill. A verbal warning was issued to the Los Altos Foods for non-compliance with the slug discharge program due to the equipment failure. Carlstrom will follow-up in 30 days to verify the company has repaired all equipment and updated the preventive maintenance schedule to include testing the diversion valve and pump system.

Los Coyotes WRP Low pH

On Friday, 6-7-19 at 2350 hours, TPO II William Moriarty came to the IW Inspector trailer at Los Coyotes WRP and reported to Night Team Supervising IW Inspector Steve Sealy that low pH wastewater was entering the WRP. He said he had just grabbed a sample from the raw wastewater spigot located just upstream of the plant influent pH meter probe and tested it at about pH=6.5 using a pH test strip from the lab. Sealy and Senior IW Inspector McIntosh re-measured the pH using a handheld digital Ph meter, obtaining a result of pH=2.05! The sample was then tested using a digital meter in the laboratory and again the pH tested very low (i.e., acidic) at pH=2.05. There appeared to be no immediate explanation for the large discrepancy between pH test strip and the pH meter results. A second sample of raw influent was collected at 0025 hours on 6-8-19 and the pH was found to be 7.4. In response to the very low pH test results, operators diverted flow at the WRP and IW Inspectors began an investigation, looking for an industrial source for the low pH.

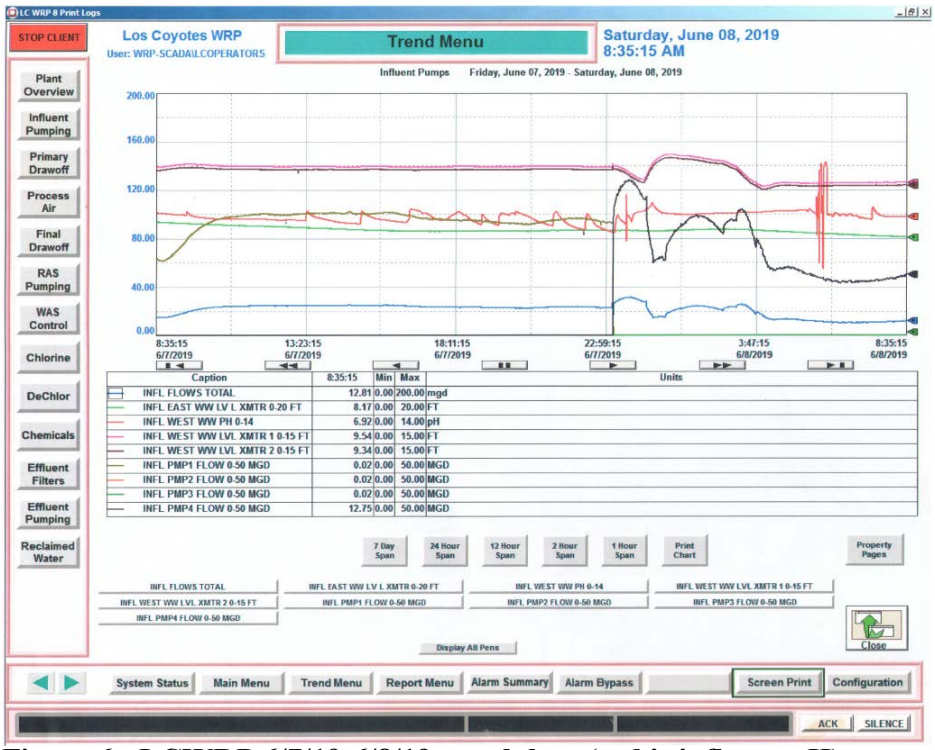

Figure 6: LCWRP 6/7/19-6/8/19 trend data (red is influent pH).

The investigation found no industrial source for the low pH and a lack of any low pH wastewater in sewers influent to the WRP. Examination of the WRP influent pH data does indicate the influent pH was a little below normal (see Figure 6). However, its cause may have been due to meter probe drift/fouling, and/or other plant operational issues. It was noted that on 6-8-19 Districts' Electrical and Instrumentation technicians attempted to calibrate the WRP's influent pH meter and determined that it needed to be replaced.

It is unclear if low pH wastewater ever did enter the WRP on 6-3-19. Other than the low pH readings made by the influent pH meter, all other WRP operational parameters and treatment process indications were normal throughout the incident. IW Inspectors speculate that the pH=2.05 readings taken from the 2350 hours sample may be due to the sample being placed in a sample bottle that already contained acid for sample preservation purposes.

Chemical Odor and White Foam in the Davidson City Trunk in Carson

On Thursday, 6-13-19 at 0739 hours, Civil Engineer Alex Manesh of the Districts' JWPCP Field Engineering Office called Supervising IW Inspector John Boyd and said that he had just received a report of an unusual chemical or solvent odor along with the presence of light white foam at Manhole (MH) 08 0386 on the 18" diameter Davidson City Trunk in the City of

Carson. He stated that several reaches of this trunk, starting at MH 386 and going downstream, were scheduled for a cured-in-place-pipe (CIPP) sewer relining project commencing that day. He said an Insituform worker, the contractor doing this work for the Districts, had contacted him earlier that same morning and stated that they had noticed the chemical/solvent odor and light foam and were concerned that as a result of performing their work they might be exposed to the chemicals and be harmed by them. Alex said they were aware that there was a permitted industrial wastewater discharger, Solvay USA, Inc., located immediately upstream of MH 386 and were concerned this could be the source of the chemical/solvent odor and foam that was noticed. Boyd told Manesh that IW inspectors would respond and would report their findings to him. South Teams' Supervising IW Inspector David Sanchez coordinated the incident response.

Solvay, USA Inc. IW 21542 50,000GPD
20851 S. Santa Fe Avenue
Carson, CA 90810

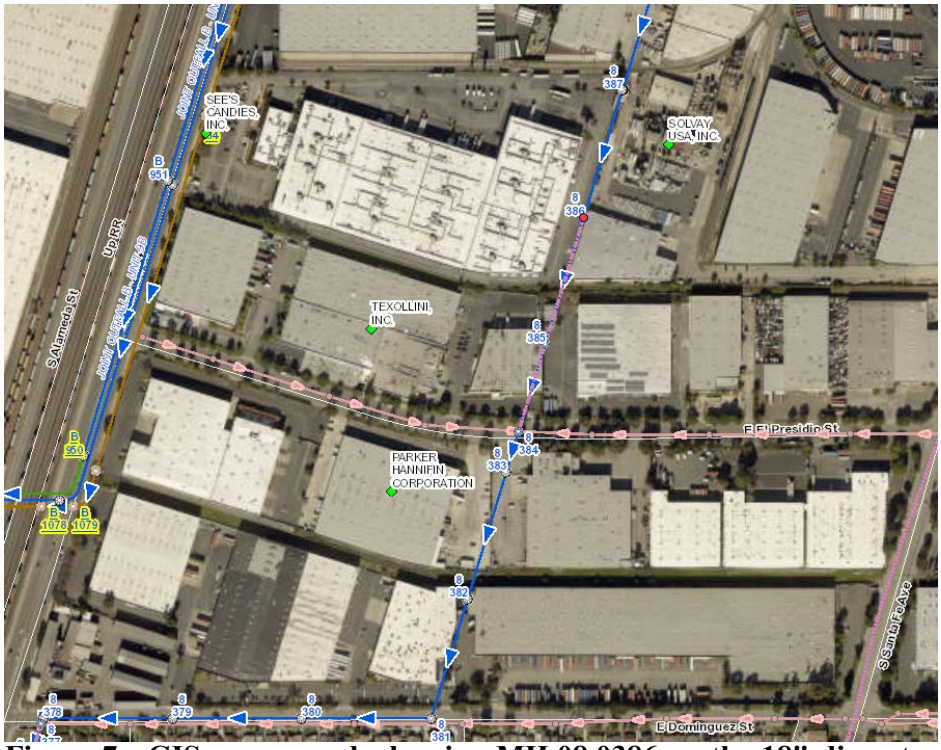

Figure 7: GIS screen grab showing MH 08 0386 on the 18" diameter Davidson City Trunk in the City of Carson and the Solvay USA Inc facility located immediately upstream of the manhole.

A follow-up investigation was conducted by Team 3 IW Inspectors Chris Mendoza, Nattapong Pengphol and Sophia Luu. Their investigation determined that Solvay USA was indeed the source of the chemical/solvent odor and light white foam observed by the CIPP crew. Solvay USA manufactures fracking and other chemicals used in the oil extraction industry. The material causing the odor was determined to residual amounts of "Foamer 1026," a surfactant solution manufactured by Solvay. The material was discharged as a part of the process of cleaning the reactor vessel where it was compounded. Inspector examination of the Safety Data Sheet for Foamer 1026 determined that the residual amounts of this material discharged to the sewer, which has an "ammoniacal" (i.e., ammonia-like) odor did not represent a health threat to the CIPP crew. Nor did this discharge represent a violation of any of the requirements or limits imposed under their industrial wastewater permit. This information was conveyed by Sanchez to Manesh, as well as Districts' Construction Inspector Steven Derleth who was assigned to the project, and the CIPP crew. The CIPP project was subsequently completed without further incident.

Whittier Narrows WRP Red Color

On Tuesday, 6-25-19 at 0830 hours, Whittier Narrows WRP Supervising TPO Carlos Alfaro called Team 4 IW Inspector Greg Neunsinger to report red colored wastewater had been noticed in bucket #4 of the primary effluent sample bottles, which corresponds to the previous day (6-24th) from 1800-2000 hours (see Figure 8). He also said the other daily primary effluent sample buckets appeared to have normal color and there were no adverse effects on WRP operations.

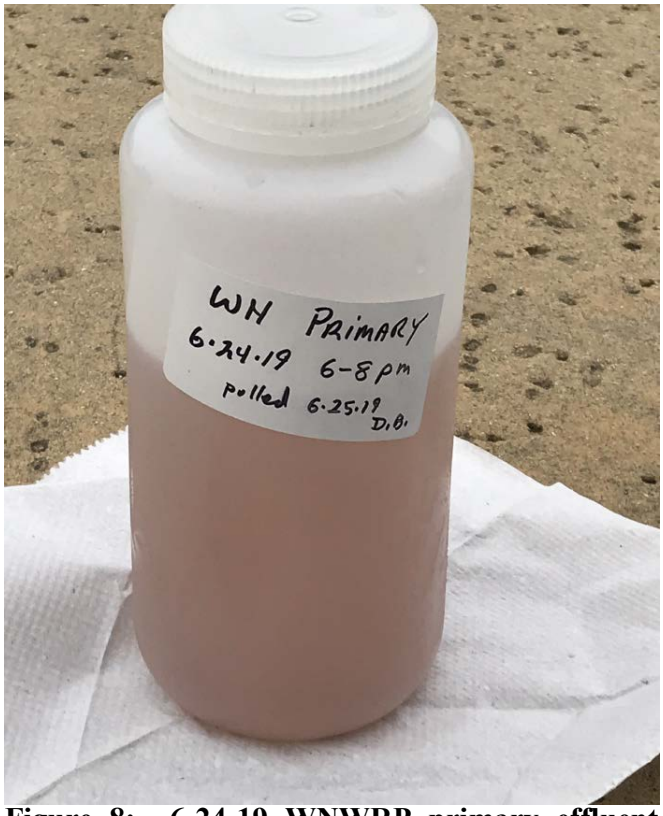

Figure 8: 6-24-19 WNWRP primary effluent bucket #4.

North Teams' Supervising IW Inspector Andy Woods coordinated the inspection staff response to this report. The response included both Day and Night Team inspectors. Seven possible industrial sources were inspected. Vanguard Design Inc. was identified by IW Inspector Ken Hanks as the likely source for the incident as his inspections of the facility found that on the day of the incident the company had been dyeing corduroy trousers a vibrant red color. Hanks noted red-dyed product in the facility and red-stained streaks in open wastewater trenches. Vanguard Design primarily does denim stonewashing, not garment dyeing. IW inspectors will be monitoring the situation closely and if necessary, will recommend that a color limit and pretreatment requirements be added to Vanguard Design's industrial wastewater discharge permit to prevent the company from impacting WRP operations. The 6-24-19 incident did not result in an NPDES violation as operators reported there was no discernable color in the plant's final effluent later that day.

Vanguard Design Inc. IW 22004 20,000 GPD
2542 Troy Ave,
South El Monte, CA 91733

JWPCP Elevated Explosivity at the J.O. 'B' Headworks

On Tuesday, 6-25-19 at 2233 hours, Senior IW Inspector Kent McIntosh received a telephone call from Mark McKnight, Supervising TPO II at JWPCP, reporting that the plant was

again experiencing elevated LEL at the J.O. 'B' headworks (see report on 6-4-19 above). The plant LEL sensors measured 61% at 2110 hours.

Senior Industrial Waste Inspector Kent McIntosh responded to the elevated explosivity report, arriving on-site at JWPCP at 2305 hours. He was unable to verify the high LEL that was monitored at the J.O. 'B' headworks. He measured 12% LEL at 4 minutes after midnight at the J.O. 'B' headworks with his portable explosimeter, contradicting the plant sensor reading of 53% at the same time. He also used the photo ion detector (PID) unit and measured 73 ppm, indicating that whatever explosivity was present was due to methane, not other hydrocarbons that would be present if the explosivity was from an industrial source such as one of the large oil refineries located upstream of JWPCP. As he was unable to confirm the high LEL reading, and the PID indicated essentially no hydrocarbons other than methane were present in the headspace gas, McIntosh, in consultation with Night Team Supervising IW Inspector Steve Sealy, decided further investigation could wait until first light.

On the morning of Wednesday, 6-26-19 at 0800 hours, Team 3 Industrial Waste inspectors took further explosivity measurements at the headworks using both their portable explosimeters and the PID unit. Results indicated normal LEL levels and very low concentrations of non-methane gases present. It was also noted that the plant J.O. 'B' headworks LEL sensor was continuing to indicate elevated explosivity levels. An examination found that there was no headspace gas from the J.O. 'B' headworks actually flowing past the J.O. 'B' headworks LEL sensor due to a blocked line. This information was conveyed to JWPCP Supervising TPO II Donald Gulley and TPO II Jowyn Villanueva-Tu, who said they would have the Districts' Electrical and Instrumentation Section technicians evaluate the combustible gas monitoring equipment. On 6-28-19 the J.O. 'B' LEL sensor was again operating normally, pumping headspace gases through the sensor and the J.O. 'B' headworks LEL trend was back to normal levels (see figure 9). IW Inspectors' think the high LEL reported on the evening of 6-25 may have been from foul air trapped in the LEL sensor chamber and not representative of the condition in the J.O. 'B' headworks. It was noted that the treatment plant, including the secondary reactors, continued to operate normally throughout the incident period. No further investigation of this incident is planned by the IW inspection staff.

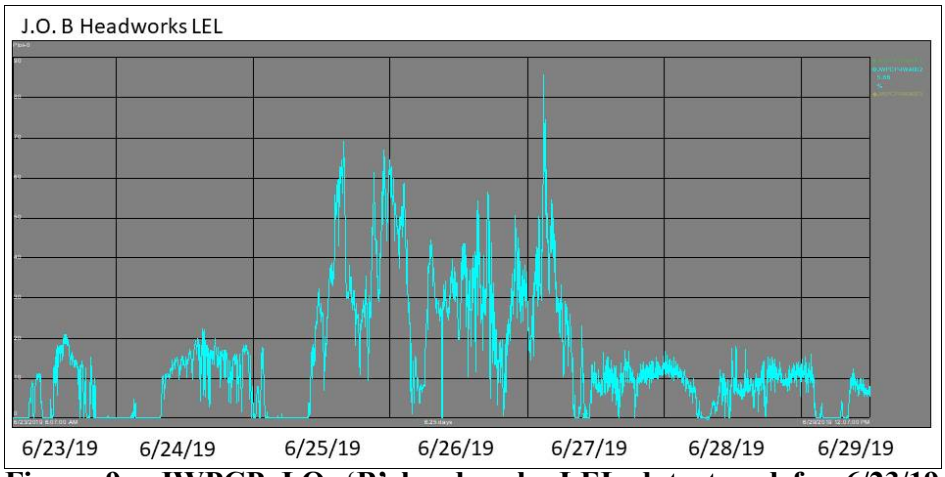

Figure 9: JWPCP J.O. 'B' headworks LEL data trend for 6/23/19-6/29/19. The LEL scale is 0-90%.

INDUSTRIAL WASTE SECTION
SUMMARY OF ACTIVITIES
FOR THE MONTH OF JULY 2019

TREATMENT PLANT/SEWER/OTHER INCIDENT INVESTIGATIONS

Acidic Discharge at Coast Plating in Gardena

On Tuesday, 7-2-19 at 1145 hours, IW Monitoring Crew Technician Alfred Johnson called Supervising IW Inspector John Boyd and reported that upon sampler set-up at Coast Plating, Inc. in Gardena he noted that the grab sample pH was 2.05 with an ongoing discharge flowrate of an estimated 20 gpm. He said that although his normal company contact was not on-site, workers had called the contact, and he then instructed company employees to allow Johnson on-site. Since the pH was so low, approximately 2.0, Alfred took two grab samples to be tested for metals, one for total metals will be preserved with acid; the second will not be preserved and will be run for soluble metals in case there is a RCRA regulation hazardous waste violation. The information was forwarded to Area IW Inspector Sophia Luu for immediate follow-up.

Coast Plating, Inc. IW 20325 25,750 GPD
128 W. 154th Street
Gardena, CA 90248

The report from Johnson resulted in multiple inspections being conducted at Coast Plating, Inc. over the following week, commencing with a joint inspection conducted by Area IW Inspector Sophia Luu and fellow Team 3 Inspector Chris Mendoza at 1215 hours on 7-2-19. These inspections, conducted by both day and night team inspectors, resulted in findings that the company was in violation of multiple permit requirements and limits, including failing to properly operate and maintain their industrial wastewater pretreatment system and associated discharge monitoring equipment, and discharging low pH wastewater. Two Notices of Violation (NOV), which included a total of 12 violations were issued as a result of the inspections conducted between 7-2-19 and 7-9-19. The company was also later cited for discharging wastewater containing excessive concentrations of chromium based on sample analysis results for samples taken during this time period. Due to the unusually high number of violations and the egregiousness of the pH exceedances, a compliance meeting was scheduled for August 27, 2019 at 1000 hours to review the violations and require appropriate actions be taken by the company to address the violations to prevent their recurrence. There was no evidence that the low pH discharge adversely impacted Districts' operations in either the collection system or at the downstream treatment plant (JWPCP). IW Inspectors continue to monitor the company closely.

Los Coyotes WRP Low pH Incident (1)

On Wednesday, 7-10-19 at 0815 hours, Los Coyotes WRP TPO II Tom Jauregui walked into the Industrial Waste Inspectors' office trailer at LCWRP. He notified the Senior IW Inspector Jim Percy and Inspector Tingting Wei that low pH influent was entering the treatment plant at 0750 hours (see Figure 1). He stated a grab sample had been collected by WRP operators and the pH was currently about 6.4, which had been confirmed by the on-site laboratory personnel.

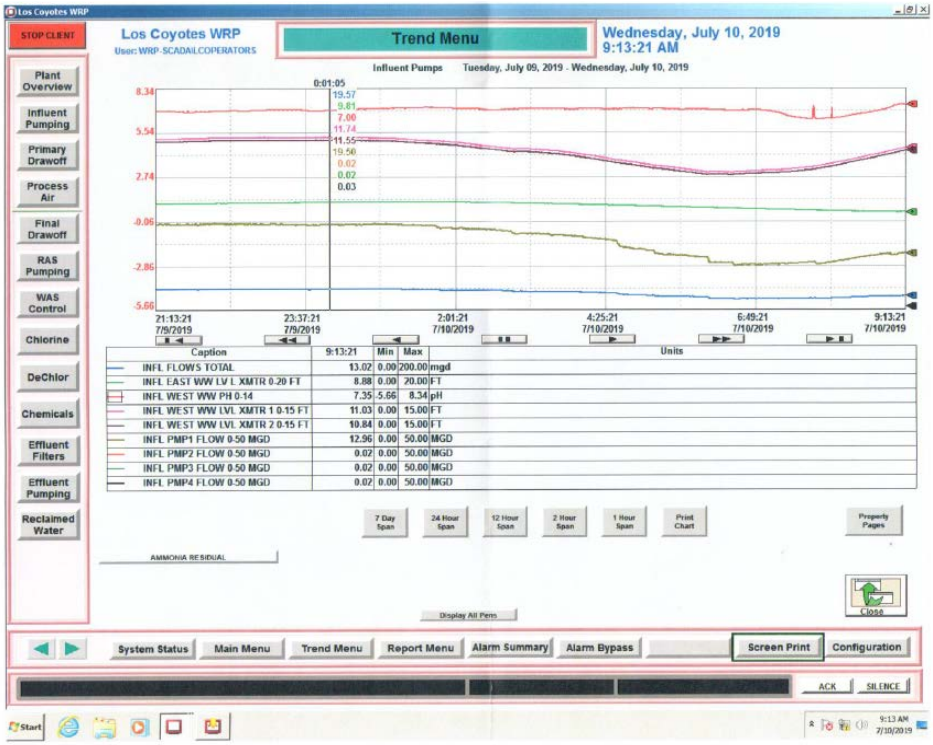

Figure 1: 12-hour, starting at 2113 hours, Los Coyotes WRP influent pH trend on 7/9/19-7/10/19 (red data trend line).

The investigation of this incident, though resulting in a significant number of inspections being conducted at possible industrial source upstream of the WRP (10), did not ultimately result in a likely source for the incident being identified. Both day and night team inspectors conducted these inspections. The incident did not impact WRP treatment operations or effluent quality.

Long Beach WRP High pH

On Thursday, 7-18-19 at 2324 hours, TPO II Will Moriarity, who is stationed at the Los Coyotes WRP, called Night Team Senior IW Inspector Kent McIntosh and reported that telemetry data from the Long Beach WRP indicated that the treatment plant was having high pH influent. Moriarity stated that the LBWRP operators had been expecting, and did, see some high influent to the WRP earlier in the day due to scheduled caustic addition activity (the influent pH rose to 10.94 at 1520 hours-see Figure 2). However, the influent pH then rose again very modestly, but unexpectedly, later in the evening, reaching the alarm level of 8.5 at 2230 hours, prompting his call to McIntosh about an hour later. Moriarity stated that operators were unaware of any scheduled crown spray activity upstream of the Long Beach WRP which could have caused this second rise in pH. Night team IW inspectors responded to the call until going off shift at 0130 hours.

About an hour later, at 0243 hours on Friday, 7-19-19 Moriarity called Supervising IW Inspector John Boyd at home and reported that a third high pH influent spike had occurred just prior to his call. He stated that the influent pH monitor had again alarmed when it reached 8.5 and was currently at 8.73 as of the time of his call. He said he had dispatched an operator to the Long Beach WRP and that the operator had confirmed the high pH using a manual pH meter. It was agreed IW inspectors would respond again, after the initial response from Night team inspectors earlier in the evening, first thing the in the morning and that Moriarity would call Boyd back if the influent pH reached 9.0. As of 0700 hours no such follow-up call was received and Team 2 Day shift inspectors, led by Supervising IW Inspector David Sanchez, had begun their follow-up investigation.

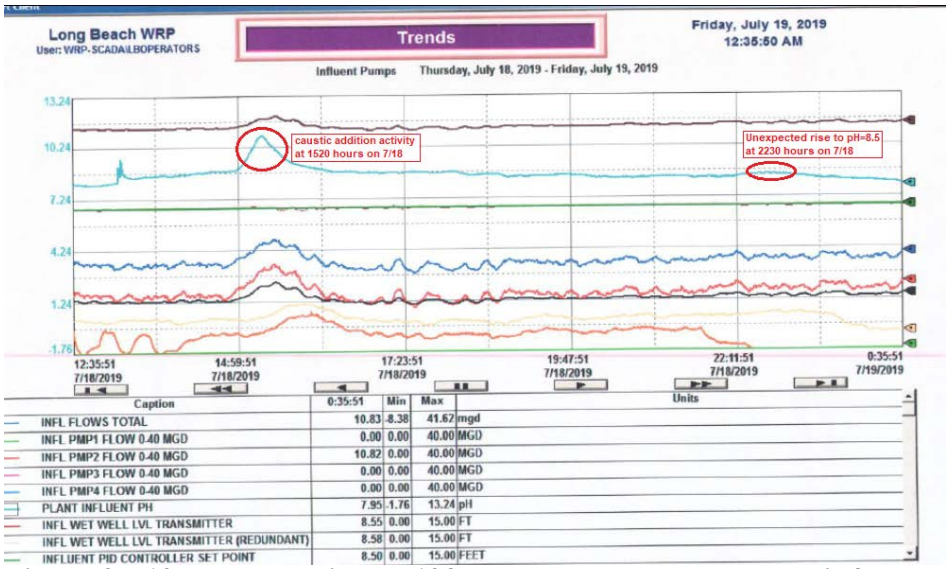

Figure 2: 12-hour, starting at 1235 hours, Long Beach WRP influent pH trend on 7/18/19-7/19/19 (light blue data trend line).

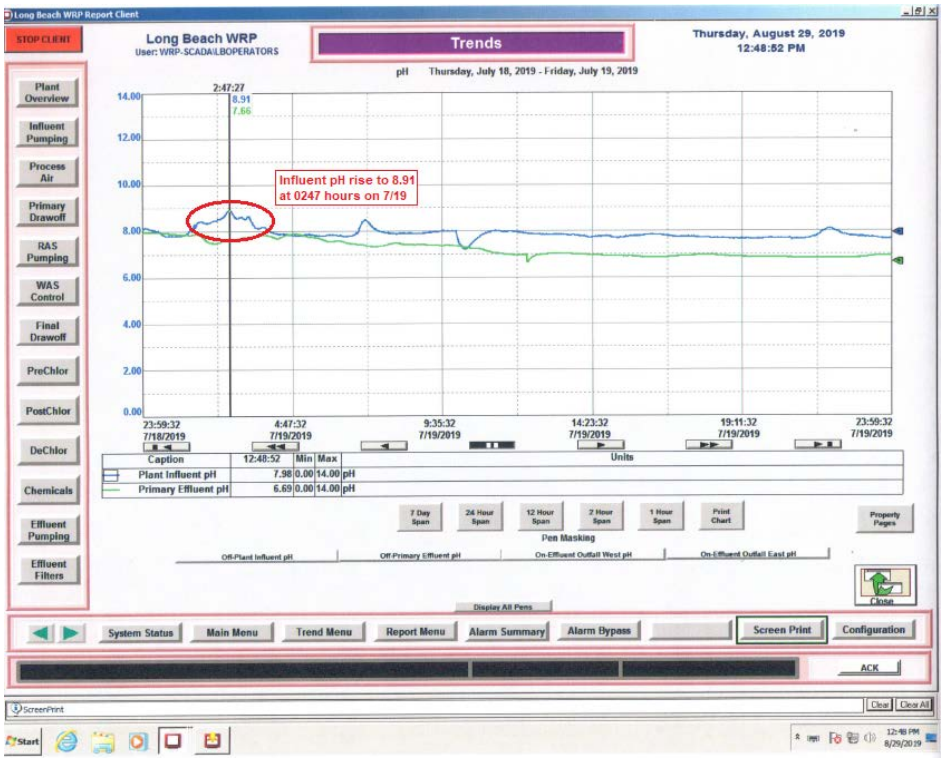

Figure 3: 24-hour pH trend at the Long Beach WRP influent pH trend for 7/19/19 (dark blue data trend line). Note the pH=8.91 spike at 0247 hours.

The investigation of these incidents did not ultimately result in a likely source for either incident being identified. Both day and night team inspectors conducted these inspections. The high pH influent did not materially impact WRP treatment operations or effluent quality. IW inspectors continue to be vigilant as to the possible source(s) for these incidents.

Los Coyotes WRP Low pH Incident (2)

On Wednesday, 7-24-2019 at 0130 hours, Los Coyotes TPO II Diana Torres called Night Team Senior IW Inspector Kent McIntosh and reported that the influent pH at the Los Coyotes WRP had dropped to 6.43, setting off the low pH alarm. McIntosh took the information and then

called Supervising IW Inspector John Boyd to discuss making an immediate IW inspector response to the call. Note that McIntosh and the other Night Team IW inspectors had been off work since 2330 hours that evening due to the IW Inspector staff meeting occurring earlier that day. This meeting necessitates that the Night Team inspectors start their 10-hour shift at 1300 hours instead of the normal 1500 hours. After calling Torres back at 0145 hours, at which time she stated the pH was essentially stable or already going back up a little (to 6.44), Boyd decided the incident did not warrant an immediate inspector response unless the pH continued to drop further. Boyd instructed Torres to notify him immediately if the pH dropped under 6.0. Torres said she had collected a sample of the influent as well. The influent pH, while not returning quite to normal, hovered in the 6.6-6.8 range for the rest of the early morning hours (see Figure 4 below). Team 2 IW Inspectors responded to this call when they started their shift on 7-24-19 at 0630 hours.

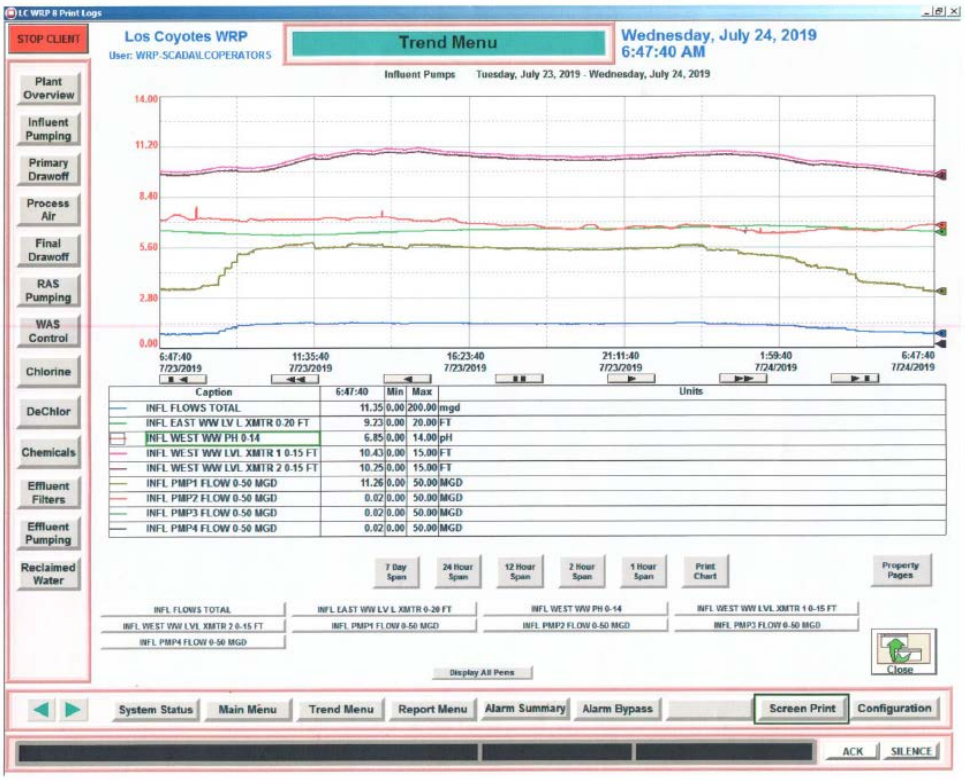

Figure 4: 24-hour, starting at 0647 hours, Los Coyotes WRP influent pH trend on 7/23/19-7/24/19 (red data trend line).

The investigation of this incident, though not resulting in a definitive source being identified, did indicate that one of the more likely sources, Shasta Beverages, Inc. in La Mirada, had apparently inadvertently switched off their industrial wastewater pH treatment system caustic addition pump and their effluent pH recorder. When the system was immediately brought back online in the presence of IW Inspector Tingting Wei, she noted the recorder pH and flow data retrieved from the memory unit indicated they had discharged about 230,000 gallon of wastewater over the previous 24 hours with an average pH of about 5.7. However, when she checked the pH meter's accuracy, she found that it was considerably off, indicating a pH of 5.2 when the actual pH, according to her handheld meter, was 7.16. Due to this discrepancy, it is unknown if the company caused or contributed to the WRP incident reported on 7-24-19. However, Wei issued Shasta Beverages a NOV for failing to properly operate both the pretreatment system and the required effluent pH meter/recorder. The incident did not impact WRP treatment operations or effluent quality.

Shasta Beverages, Inc. IW 15351 50,000 GPD
14405 Artesia Boulevard
La Mirada, CA 90638

Pomona WRP Toxicity and Elevated Silver Concentration

On Wednesday, 7-24-19 at 0800 hours, Districts' Senior Environmental Scientist Phil Markle of the Reuse and Compliance Section came into Supervising IW Inspector John Boyd's office at JAO and reported that a recent Pomona WRP effluent sample had tested very high for silver at 28.5 ug/l (ppb). The 24-hour composite sample was taken on 7/1-2/19. The sample also caused 24-hour 100% mortality in the *Ceriodaphnia dubia* (water flea) toxicity test. Markle stated that the normal silver concentration seen in such testing at the Pomona WRP was <1.0 ppb. He also said that per his calculations, since this was a flow-weighted 24-hour composite sample, the minimum total amount of silver discharged into the sewer, assuming no removal and 6 MGD of influent flow, would be about half a kilogram, or 20 ounces.

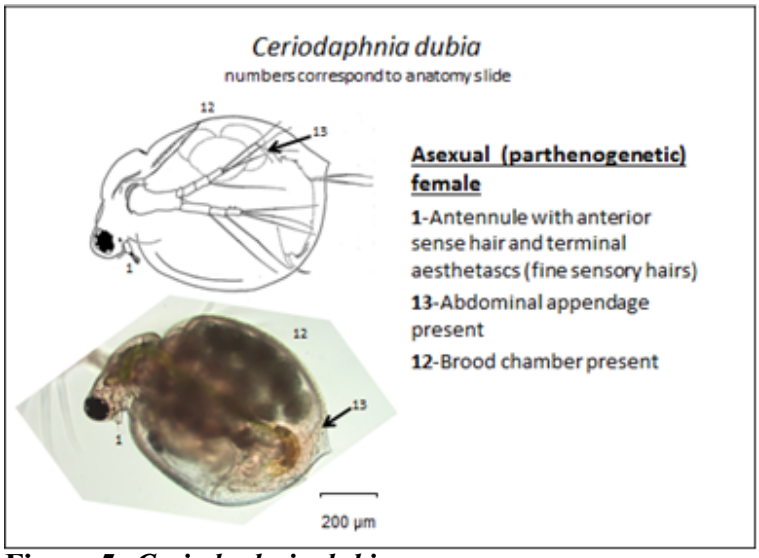

Figure 5: ***Ceriodaphnia dubia***

IW Inspectors Nguyen Dang and Helen Luu from inspection Team 1 are investigating this report. Their inspections at multiple metal finishing operations that do, or could, use silver; as well as other industrial facilities that have the potential to have process solutions or other materials that could be discharged into the sewer that contain silver have thus far not found any sources. It is noted that many of the uses of silver processing solutions that used to exist have now effectively ceased. These include film processing, both on a hobby basis by homeowners and at commercial film laboratories, as well as at other industries such a metal parts testing facilities and hospitals (x-ray film processing). Digital photography has all but eliminated the film developing processes that historically generated silver laden wastewaters. It was suggested that a possible source for the silver in this incident could be an industrial facility or even a homeowner dumping their old film developing solutions. While this is certainly possible, locating and identifying such a source may be very challenging to say the least. IW Inspectors continue to be vigilant to any possible source for this incident in the area influent to the Pomona WRP.

INDUSTRIAL WASTE SECTION
SUMMARY OF ACTIVITIES
FOR THE MONTH OF AUGUST 2019

TREATMENT PLANT/SEWER/OTHER INCIDENT INVESTIGATIONS

Whey Spill at Saputo Cheese USA in South Gate

On Tuesday, 8-13-19 at 1000 hours, Plant Manager Milap Gandhi of Saputo Cheese USA Inc. called Supervising IW Inspector John Boyd and reported that the facility had spilled 3000-4000 gallons of condensed whey solution into a floor drain that was eventually discharged to the sewer. The spill occurred the previous evening at 2030 hours and was caused by a valve clamp failure on a whey holding silo (tank). The clamp failure resulted in the valve separating from the tank, allowing the contents of the silo to spill onto the floor and into an adjacent drain. The spilled material then flowed to the wastewater equalization tank and was subsequently discharged to the sewer. When asked why the notification call was not made until more than 13 hours after the spill occurred, Gandhi explained that although he had been made aware of the spill the previous evening, his call to the company's Environmental Manager asking her what to do next in terms of notifications had gone unanswered that evening. She apparently received the message Gandhi left for her the next morning and only just prior to his call did she advise him to notify the Sanitation Districts. Boyd explained to Gandhi the importance of timely notification in cases such as this where a large volume of high strength material has been discharged into the sewer. Gandhi apologized for the failure to notify as required.

Saputo Cheese USA Inc. IW 14716 281,300 GPD
5611 E Imperial Highway
South Gate, CA 90280

Saputo Cheese USA is a large producer of mozzarella string cheese. Night Team IW Inspectors Jose Ruiz and Lanae Turner followed up on the call from the company, arriving onsite at 1837 hours on 8-13-19. They spoke to company managers and confirmed the details of the report as stated above. A written notice of violation was issued for failing to report the spill immediately. The discharge at the time of the inspection was found to be in compliance with all requirements and limits. There is no evidence that the spill negatively impacted the Districts' collection system or downstream treatment facility, the JWPCP.

Excessive Grease in the Inglewood Trunk Sewer in Inglewood

On Thursday, 8-15-19 at 0915 hours, Supervisor of Sewer Maintenance Brian Pivovaroff emailed Supervising IW Inspector John Boyd reporting that his hydrojetter operator Javier Flores observed an "excessive grease/oily substance" in the Inglewood Trunk No. 1 sewer at Manhole (MH) 05 0501 which is located within the City of Inglewood Maintenance Yard at 222 W. Beach Avenue, Inglewood. Supervising IW Inspector Andy Woods, who was filling in for John Boyd, received the email and forwarded it to Team 3 Senior IW Inspector Bill Barnum with a request that he coordinate a follow-up investigation.

Assuming that the report was of food grade grease (polar grease) seen historically in this sewer, which has been generally attributed to discharges from Goodman Foods (AKA Don Lee Farms), a large school lunch manufacturer, Area IW Inspector Shawn Cleaver inspected the two most likely sources for such grease, the aforementioned Don Lee Farms, and Rocker Bothers Meat & Provision. However, he determined that the industrial wastewater grease removal equipment at both of these facilities was operating properly and there was no excessive grease observed in their wastewater discharge, nor was there any evidence found indicating that large amounts of grease had been discharged recently that might account for the report from Pivovaroff. Cleaver then met with Flores, who was hydrojetting the Inglewood Trunk No. 1 further upstream at MH 05 0520. According to Flores the grease reported at MH 05 0501 had been observed the day before and he described it as a black petroleum type oil rather than grease from food manufacturing. Unfortunately, workers hadn't taken a sample of the material and thus

no analysis could be performed to determine the exact nature of the oil/grease. However, Flores' description of the material as being more like a petroleum oil caused Cleaver and Barnum to expand the scope of their investigation to include petroleum oil sources. Inspections of two auto repair shops and the City of Inglewood Maintenance Yard were conducted but again no evidence was found to suggest these facilities were the source of the oily material.

No source of the grease/oil incident was identified, and it remains unclear exactly what type of oily material was in the sewer. IW Inspectors remain vigilant when conducting inspections in this area as to possible sources for the incident. To aid in future investigations Pivovaroff was encouraged to have his workers collect samples of the materials being reported to aid in the investigations of industrial sources.

Silver Cyanide Solution Spill Tri-Star Electronics International in El Segundo

On Friday, 8-23-19 at 0700 hours, Supervising IW Inspector David Sanchez noted a California State Office of Emergency Services (OES) website spill report of a 35-75 gallons of silver cyanide solution spilling on 8-22-19 at 1420 hours at Tri-Star Electronics International, Inc. in El Segundo. The report stated that a caller reporting the spill stated the spill was caused by an automated equipment malfunction with the spilled material being released into the secondary containment on-site. Facility staff of approximately 120 people were evacuated due to the potential for lethal concentrations of hydrogen cyanide (HCN) gas to develop from such spills.

Tri-Star Electronics International, Inc. IW 21138 4000 GPD
2201 Rosecrans Avenue
El Segundo, CA 90245

Area IW Inspector Shawn Cleaver responded to the report, arriving onsite at 0830 hours on 8-23-19. This company manufactures electroplated pin connectors for electronic circuit boards used in the aerospace industry. His inspection verified the facts of the spill noted above where silver cyanide plating solution spilled inside the company's plating shop, accumulating in a secondary containment tank. It was also stated that some spilled solution did splash over into a plating area walkway. The spill was caused by an error by a technician who was repairing or servicing pumps that transfer plating solutions from their reservoir tanks directly below the plating line to the plating tanks themselves. In an abundance of caution company managers decided to evacuate all employees and then notified the local Fire Department. The El Segundo Fire Department and an L.A. County Fire Department Hazardous Materials Unit responded but did not enter the plating area due to the HCN gas danger. The entry and cleanup operations were conducted by a private emergency response contractor, NRC, which vacuumed up the spilled solution. At the time of the Cleaver's inspection no employees had yet been allowed to reenter the plating shop. Cleaver's inspection revealed no unusual conditions in the pretreatment area and no ongoing wastewater discharge. The wastewater at the sample box was clear and colorless with a pH of 7.44. Approximately 25 gallons of spilled silver cyanide solution was being held in an open top drum for disposal/recycling off-site. Treatment logs showed that the last batch of treated wastewater was tested and released at 0900 hours the previous morning. There was no indication that any of the spilled solution was treated or released to the sewer without treatment. There were no injuries associated with the incident and there was no evidence found that as a result of the incident there were any industrial wastewater violations or that the incident impacted the sewer system or downstream Districts' facilities.

Excessive Thick Orange-Brown Grease in the Irwindale Trunk Sewer

On Friday, 8-23-19 at 0905 hours, San Gabriel Valley Field Office Supervisor of Sewer Maintenance Bill Balas called Supervising IW Inspector John Boyd. Balas reported that one of his crews was encountering large amounts of orange-brown colored thick grease, with the "consistency of toothpaste" in section 1 of the Irwindale Trunk sewer at MH 22 1037 in the city of Irwindale. MH 1037 is the upstream manhole on a 24" siphon structure that crosses under a large concrete storm water channel. Balas said he was sending out a jetter truck because the crew was concerned the grease might cause the line to plug and overflow. No unusual odors or LEL conditions were reported. Balas said the crew was reporting the grease was actively

entering the manhole, implying that the discharge of the grease into the sewer could still be ongoing. The crew told Balas that they had taken a sample of the grease and would hold it for IW Inspectors.

Figure 1: Photo of the grease in MH 22 1037 on 8-23-19.

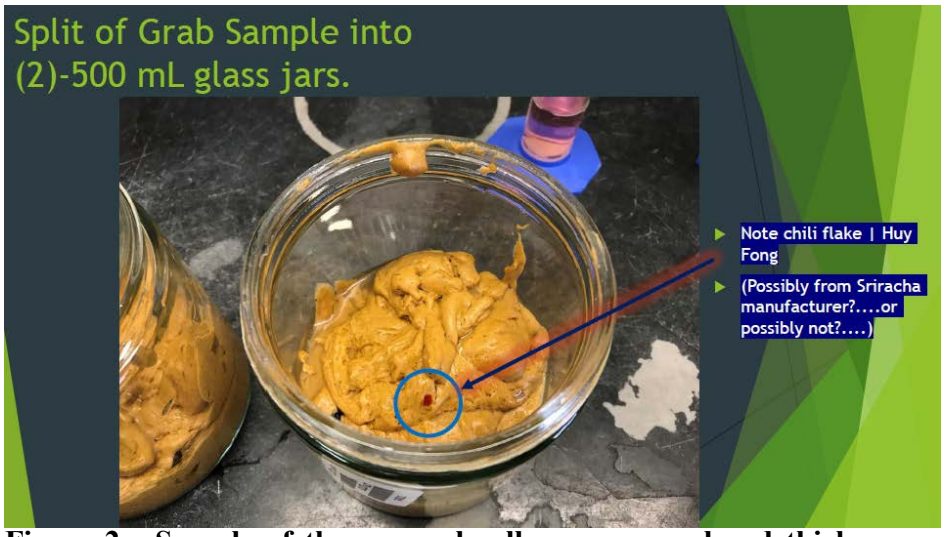

Figure 2: Sample of the unusual yellow-orange colored thick grease type material removed from MH 22 1037. Note its highly viscous nature and "ropy" texture.

On 8-23-19 at 1005 hours, IW Inspectors David Joh and Greg Neunsinger responded and met with Bruce Gomez (Lead Maintenance & Construction Worker) & Jose Ochoa (Maintenance & Construction Worker II) from the San Gabriel Valley Field Office. Gomez gave a grab sample of the grease material to Joh (see Figures 1 and 2 above). The sample was very unusual compared to normal kitchen grease found in sewers in terms of both its appearance and texture. It had no odor and was smooth, slick, and relatively hard to the touch of a gloved finger.

The Districts' sewer maintenance crew was able to successfully clear and clean the line, preventing any overflows from occurring. During this process it was determined that the grease material was not actively flowing into MH 1037 and there was thus no material to trace upstream to a source. GC/MS sample analysis identified the sampled material as being oleic acid (see Figure 3), thus allying IW Inspector concerns the material was something more exotic or unusual like a resin material which could have presented a more problematic concern to the integrity of the collection system. Oleic acid is a fatty acid that occurs naturally in various animal and vegetable fats and oils. It is common in the production of food products.

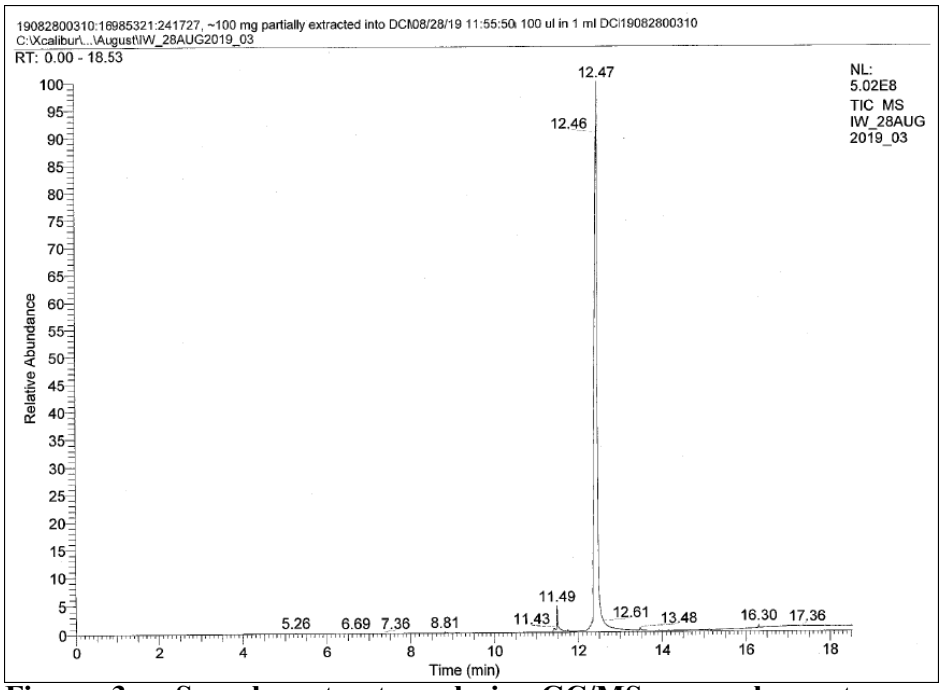

Figure 3: Sample extract analysis: GC/MS scan chromatogram indicating a large peak at 12.47 minutes. This peak was determined to correspond to oleic acid.

This incident ultimately resulted in an "all hands" response from the IW inspection staff that included multiple inspectors from both Team 1 and the Night Inspection Team. Despite inspections being performed at about ten possible upstream industrials sources, several of which were inspected multiple times at different times of the day and evening, no likely source has yet been identified. Inspectors have also attempted to trace the material to an upstream source by looking for residual amounts of this material in sewer lines, however this approach has also been unproductive.

Additionally, Districts' IW inspectors worked closely with their counterparts at the Los Angeles County Department of Public Works (DPW) on this investigation. The DPW operates two local line sewer pumping stations in the area immediately upstream of the siphon structure manhole where the grease was reported on 8-23-19. These pumping stations have periodically had operational issues and problems which the DPW have traced to various industrial sources located upstream. As a result of these investigations DPW staff are very knowledgeable of the industries in this area.

The investigation has yet to identify the source of the grease but remains ongoing. IW inspectors continue to inspect possible sources and will be following up with sewer maintenance staff when the siphon structure is next cleaned in late-September to see if the same material is present again. Finally, more laboratory analyses of the sample material are planned using a new laboratory instrument, an FTIR (Fourier Transform Infrared Spectroscopy), that is currently in the process of being brought online by Districts' staff at the San Jose Creek Analytical Plant Laboratory. It is hoped this further analysis will help lead to source identification.

INDUSTRIAL WASTE SECTION
SUMMARY OF ACTIVITIES
FOR THE MONTH OF SEPTEMBER 2019

TREATMENT PLANT/SEWER/OTHER INCIDENT INVESTIGATIONS

Call for Assistance at Marina Pacifica Pumping Plant #3

On Tuesday, 9-10-19 at 2000 hours, Supervising IW Inspector John Boyd received a telephone call from Districts' Division Engineer Andre Schmidt of the Compton Field Office (Sewer Maintenance). Schmidt reported that a bypass test at the Marina Pacifica Pumping Plant #3 in Long Beach earlier that day had unfortunately resulted in a temporary plug getting stuck (wedged) in the plant's wet well influent line. He stated that in order to free the plug, it was now necessary to reduce flows in the line as much as possible. To accomplish this, Districts' operators were planning to activate the remote flow shut-off switch at the Long Beach Main Alarm Center for Synergy Oil & Gas, LLC, a large oil production field and industrial wastewater discharger located upstream of the pumping plant. However, Schmidt requested that if possible, IW inspectors contact Synergy prior to the shut-off as a courtesy. Schmidt also asked that any other large dischargers upstream of the Marina #3 PP also be requested to shut off their flows, including The Termo Company oil production facility. Boyd acknowledged the request and contacted Night Team Supervising Inspector Steve Sealy and tasked him with notifying Synergy of the plan to shut off their flow. Boyd asked Sealy to notify Schmidt once that had been done so that the Alarm Center operators could then activate the remote shutoff switch. Sealy said he would do so, as well as try to see if he could contact the Termo facility with the request.

Synergy Oil & Gas, LLC 6433 E. 2nd Street Long Beach, CA 90803	IW 21422	540,000 GPD
The Termo Company 6301 E. Pacific Coast Highway Long Beach, CA 90803	IW 12289	65,000 GPD

Sealy was able to contact both the Synergy and Termo facilities within an hour. Flows from both facilities were subsequently shut off, helping to create the needed flow reduction which resulted in the successful removal of the wedged plug by midnight. Sealy then notified both Synergy and Termo that they could resume their normal industrial wastewater discharge.

Pomona WRP High pH

On Wednesday, 9-11-19 at 1030 hours, Pomona WRP TPO II Benson Braxton called Supervising IW Inspector John Boyd and reported that for the last 2-3 nights the WRP had seen a short period of elevated influent pH. He said examination of influent pH data indicated that on each night the influent pH "spiked" to 8.5 at about 0245 hours for about 10 minutes total. The WRP is unmanned at that time and so it was unknown if there were any unusual odors, colors or other characteristics associated with the elevated pH influent, though the Braxton stated that the plant treatment processes and effluent quality were unaffected by the spikes. The information was forwarded by Boyd to North teams' Supervisor Andy Woods for follow-up.

Figure 1: Pomona WRP influent pH trend data for 9-10-19. The pH data, in blue, indicates a pH= 9.06 peak just before 0300 hours.

Both IW Inspection Team 1 and the Night Inspection Team, under the leadership of Supervising IW Inspectors Andy Woods and Steve Sealy respectively, investigated these incidents and several more similar incidents that occurred in the week following the initial report. The investigation, which included a finding that the high pH material was accompanied by grease, determined that Ling's, a large manufacturer of orange-flavored pre-cooked chicken most commonly sold at Trader Joes supermarkets, was the source of the high pH. Inspectors found that around midnight Monday-Friday workers at Ling's would use strongly alkaline cleaning solution and hot water to clean their chicken frying equipment resulting in the high pH and grease laden wastewater going to the Pomona WRP. The company was issued a verbal warning for causing the incidents and they immediately reduced the amount of alkaline cleaning solution being used in order to stop impacting the WRP. These efforts have thus far proven to be successful in preventing further high pH incidents at the WRP. IW Inspectors have recommended that the company be required to install an effluent pH meter/recorder such that the company can be monitored in the future for these types of discharges.

Ling's IW 17041 4200 GPD
212 W. Santa Fe St.
Pomona, CA 91767

<u>Pomona WRP High Chloride</u>

On Friday, 9-20-19 at 0900 hours, Districts' Reuse and Compliance Section Supervising Engineer Naoko Munakata came to Supervising IW Inspector John Boyd's office and reported that a recent Pomona WRP final effluent sample taken on 8-6-19 had tested high in chloride. The 24-hour sample result was 186 mg/l, exceeding the NPDES limit of 180 mg/l, as well as the reuse limit of 150 mg/l. Additionally, Munakata stated that recent Pomona WRP final effluent chloride test results had been in the 120-140 mg/l range. This information was forwarded to North Teams' Supervising IW Inspector Andy Woods for a follow-up investigation concerning identifying the source(s) for the high chloride concentration in the 8-6-19 effluent.

On Tuesday, 9-24-19 Woods had a telephone conversation with Districts' Reuse and Compliance Section Associate Engineer Ryan Honda to request August test results that might

indicate some clues as to the source of chlorides; e.g., metals, etc., and any preliminary September results. Honda stated that he would gather that data and provide it to the IW inspection staff. He was able to immediately convey that the August samples had elevated nitrate/nitrite concentrations, but below violation levels. He also said the WRP's August effluent samples all passed toxicity tests.

The investigation of this report, conducted primarily by Area IW Inspectors Helen Luu and Nguyen Dang, did not identify a source for the elevated chloride. However, it was noted that during this time period, Master Recycling Center, an industrial wastewater discharger then still operating in Pomona upstream of the WRP, could have been the source. The company, whose primary business operation was sewering large amounts of out-of-date and/or off-spec beverages, was noted to have a significant quantity (hundreds+) of pickles packed in glass jars onsite in July and August of 2019 (see Figure 2 below). Pickle juice typically contains high concentrations of calcium chloride. IW Inspectors, who saw the pickle jars in question, now suspect that consistent with the company's business practice, the pickle juice in the jars was discharged into the sewer, and the jar glass recycled. The facility is now out of business due to failing to pay owed Districts' sewer surcharge in an amount over $150,000.00. Their IW connection was cut on 8-1-19 due to this issue, but evidence was observed on multiple subsequent occasions that they were continuing to discharge through an illicit connection until September 2019 when the Districts performed the unusual action of sealing up both their sewer connections on 9-19-19 at the points where they connected to the City's local sewer line in order to prevent any further illicit discharges. The disposition of the pickle solution is unclear, but it's possible it was dumped into the sewer causing the August 6th chloride exceedance at the WRP.

Master Recycling Center 1980 S. Reservoir Street Pomona, CA 91766	IW 17014 (Revoked 7-24-19)	8000 GPD

Figure 2: Pickle jar on the property at Master Recycling Center on 8-18-19 at 1000 hours.

Ragging at the Lancaster WRP

On Wednesday, 9-25-19 at 1200 hours, Lancaster WRP Supervisor of Treatment Plant Operations Alfonso Vasquez called Senior IW Inspector Anie Kellzi and reported excessive ragging was occurring regularly at the WRP's influent pumps.

Kellzi and IW Inspector Steven Lajkowicz responded to the incident, arriving onsite at the WRP at 0945 hours on 9-26-19. TPO II Jim Barrick reported that rags in the influent wastewater clogged the influent pumps between 2100 hours on 9-22-19 and 0200 hours on 9-23-19. The clogged influent pumps triggered backup pumps 5 times in the 5 hours in contrast to normal operations of once or twice in a 24-hour period. Occasional rags in the influent stream are normal; however, this event was reported by Barrick as excessive. Unfortunately, operators did not collect a sample of the rags or take pictures of the rags before discarding them so IW inspectors were unable to determine the exact nature of the rags, i.e., whether they were made of actual fabric such as cotton or polyester, or of a non-woven plastic material such as what is used to make "flushable" wipes that have previously been identified historically as "rags" during previous similar reports of ragging at WRP influent structures and sewer pumps. Nevertheless, Barrick characterized the rags as long white strips of "cloth." Influent flow,

dissolved oxygen, and pH levels remained normal during the event. Operators were able to clear the rags from the pumps, which then resumed normal function.

Kellzi and Lajkowicz inspected multiple possible upstream industrial sources for fabric/cloth rags including the California State Prison, Mission Linen Supply, and the LA County Probation Department's Challenger Memorial Youth Center. Inspectors determined that the sewer grinders, screens and rag removal treatment at these facilities were operating normally with no evidence found indicating that any was the source of the ragging at the WRP. IW inspectors continue to monitor WRP operations and remain vigilant to any possible industrial sources of ragging in the area tributary to the WRP.

Palmdale WRP Green Color

On Thursday, 9-26-19 at 1500 hours, an IW Section office secretary received a phone call from Palmdale WRP TPO II Juan Huerta, who reported dark green colored wastewater was present in the grit chamber and primary tanks. Senior IW Inspector Anie Kellzi spoke to Huerta shortly thereafter. Huerta stated that the green color was first noticed around 1445 hours, with the influent pH normal at 6.77 and no unusual odors present. Huerta collected samples of the green colored wastewater from the grit chamber and the primary tank for possible analysis (see Figure 3 below). As the green color material had yet to enter the secondary tanks it was then unknown if the material would adversely affect the treatment plant operations.

Figure 3: 3 Palmdale WRP 9-26-19 green-colored samples and a green-colored sample of chiller water taken from Lockheed Martin.

Kellzi responded to the incident report, arriving onsite at the Palmdale WRP at 0945 hours on 9-27-19. Operators reported to Kellzi that the WRP had experienced a moderate short-term increase in both the secondary effluent and final effluent turbidity levels during the previous evening that may have been associated with the green color influent. It was noted that at no time did the final effluent turbidity approach the 120-second limit of 2.6 NTU, having peaked at 1.20 NTU. Operators added that the failure of two recycle pumps may have also contributed to the increased turbidity. Kellzi subsequently inspected five industrial facilities upstream of Palmdale WRP as possible sources for the incident, but none appeared to be a likely source. Green-colored wastewater is occasionally discharged to the sewer from chiller maintenance operations at Lockheed Martin Corporation's Plant 10 which is upstream of the WRP. However, the company is required to notify the Districts prior to these discharges. There

was no such notification given nor or any admission by the company that chiller wastewater was recently discharged. Nevertheless, Senior I.W. Inspector Anie Kellzi obtained a grab sample of the chiller water to compare it with the green WRP samples. The WRP and Lockheed samples were submitted for HPLC color scan analysis. The results found that the WRP green color was likely a food dye and not the chiller water from Lockheed Martin.

As the investigation failed to identify a likely source for the green color, IW inspectors will continue to monitor WRP operations, investigate non-traditional food dye sources, and respond to any future incidents.

INDUSTRIAL WASTE SECTION
SUMMARY OF ACTIVITIES
FOR THE MONTH OF OCTOBER 2019

TREATMENT PLANT/SEWER/OTHER INCIDENT INVESTIGATIONS

One-Time Discharge Request-Fire Suppression System Test in Palmdale

On Wednesday, 10-16-19 at 1130 hours, Supervising IW Inspector John Boyd received a telephone call and tentative request from Mr. David Cooper of Johnson Controls Inc. to discharge 1000-2000 gpd for several days, commencing on Thursday, 10-17-19, of 1% Aqueous Film Forming Foam (AFFF) contaminated firewater generated from testing the fire suppression systems at the NASA Armstrong Flight Research Center in Palmdale, CA. Cooper stated they would be generating about seven 250-gallon totes of wastewater with each test. He said he was hoping to haul this wastewater to one of the Districts' Liquid Waste Disposal Stations (LWDS), such as the one nearby in Lancaster, for disposal. Boyd informed him that disposal of such wastes would not be allowed due to the general Districts' policy of not accepting industrial wastewaters at the LWDS. However, Boyd told him there was a possibility that the discharge could be allowed, on a one-time approval basis, at the existing industrial wastewater discharge outfall at the NASA Armstrong Flight Research Facility (clarifier and sample box). Boyd said he would need to work with managers at the Sanitation Districts to evaluate such a request, given concerns about PFAS compounds known to be present in AFFF containing firewater, as well as concerns about the potential for this material to cause foaming at the downstream Districts' water reclamation plant (Palmdale WRP). Boyd also noted to Cooper that any such approval would be contingent upon managers at the Flight Research Center (FRC) facility being willing to take legal responsibility for the discharge since it would be made through their outfall. Boyd said he would get back to him later that afternoon.

NASA Armstrong Flight Research Center IW 21748 1500 GPD
2825 East Avenue P Building 703
Palmdale, CA 93550

At 1530 hours on the afternoon of 10-16-19 Boyd called Cooper back and informed him the one-time discharge approval request was being denied. The request was denied due to concerns about the presence of the PFAS compounds in the wastewater having the potential to pass-through the Palmdale WRP and concerns about the potential to cause foaming at the WRP. When told of this denial, Cooper said he wasn't surprised to hear this and also said that even if the Districts had been willing to give approval, managers at the FRC had already decided NOT to allow the discharge at their facility's IW discharge location due to the need for them to taken legal responsibility for it. Cooper then thanked Boyd for his assistance in the matter and requested he email him a summary of the request and denial. Boyd sent Cooper the requested email shortly thereafter and the matter was closed.

Pomona WRP high pH and Red/Orange Color

On Wednesday, 10-16-2019 at 0521 hours, San Jose Creek East WRP TPO II Kyle Rodman telephoned Supervising IW Inspector Andrew Woods to report high influent pH at the Pomona WRP. San Jose Creek serves as the alarm center for the Pomona WRP as it is unattended at night. Rodman reported that at 0505 hours the raw influent pH rose above 9 and that he sent an operator to the WRP to collect samples and verify conditions. At 0623 hours, Rodman again telephoned Woods to report a second high-influent pH bump at 0612 hours. The responding operator was by then on-site and collected samples of the second pH bump. The influent high-pH wastewater was observed to have a red/orange color and the pH peaked at 9.36. Both high-pH events were brief, lasting about 15 minutes each. At approximately 0745 hours, Senior IW Inspector Anie Kellzi, as well as IW Inspectors Helen Luu and Steve Lajkowicz, arrived the WRP and received the samples taken earlier for color comparison and potential lab analysis. It was noted that only the 0612 hours pH=9.4 sample had color. At 0805 hours, another high-pH alarm occurred, peaking at 8.66 and lasting about 15 minutes.

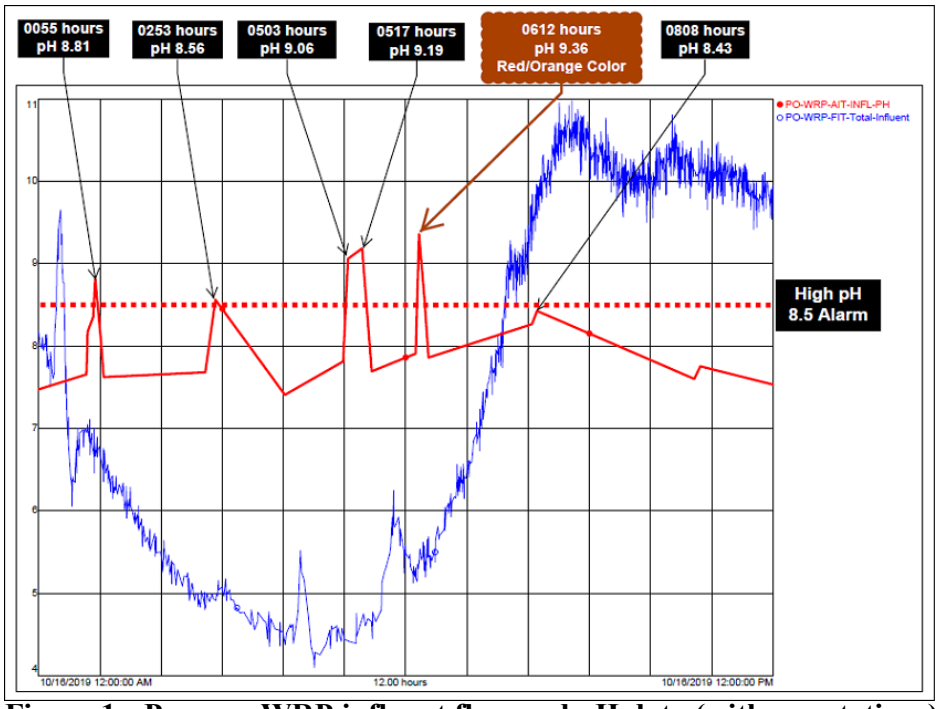

Figure 1: Pomona WRP influent flow and pH data (with annotations) for midnight to noon on 10-16-19.

Figure 2: 4 samples from the Pomona WRP taken on 10-16-19. Note the marked red color of the influent sample on the right as compared to the wastewater already in the plant at that same time.

Review of file information and phone calls by Rodman and Woods determined that the elevated pH was not due to any caustic dosing or crown spray activity, neither of which was scheduled upstream of the Pomona WRP that or the previous day. Ultimately, no WRP operational issues or problems occurred due to the elevated pH influent slugs.

The investigation to identify a source for the high pH influents on 10-16-19 was conducted by both day and night team inspectors. Nine industrial sources were inspected as part of this investigation and one of those, Juicy Whip Inc, a flavored fruit juice beverage manufacturing and bottling operation in La Verne, was identified as the source. Inspections conducted at the facility by Kellzi, Luu, and subsequently by Night Team IW Inspectors Carley Craig, Steve Sealy (Supervising Inspector), and Lanae Turner resulted in findings that

wastewater discharged from the facility matched, per laboratory FT-IR and microscopic analyses, the color and solids characteristics of the wastewater received at the WRP during the high pH incidents. It was also determined that the cause of the high pH discharge at Juicy Whip Inc. were malfunctioning and out-of-calibration pH neutralization system meters and monitoring equipment. Juicy Whip was subsequently cited for discharging wastewater with a high pH and color that impacted the Pomona WRP, as well as for failing to maintain and operate properly their required industrial wastewater pH neutralization and monitoring equipment. Follow-up inspections determined that within two weeks the Juicy Whip facility had affected the needed repairs to all pH equipment and were investigating the potential to install bag filters on the discharges of especially colored wastewater flows to address the issue of discharging highly colored wastewater.

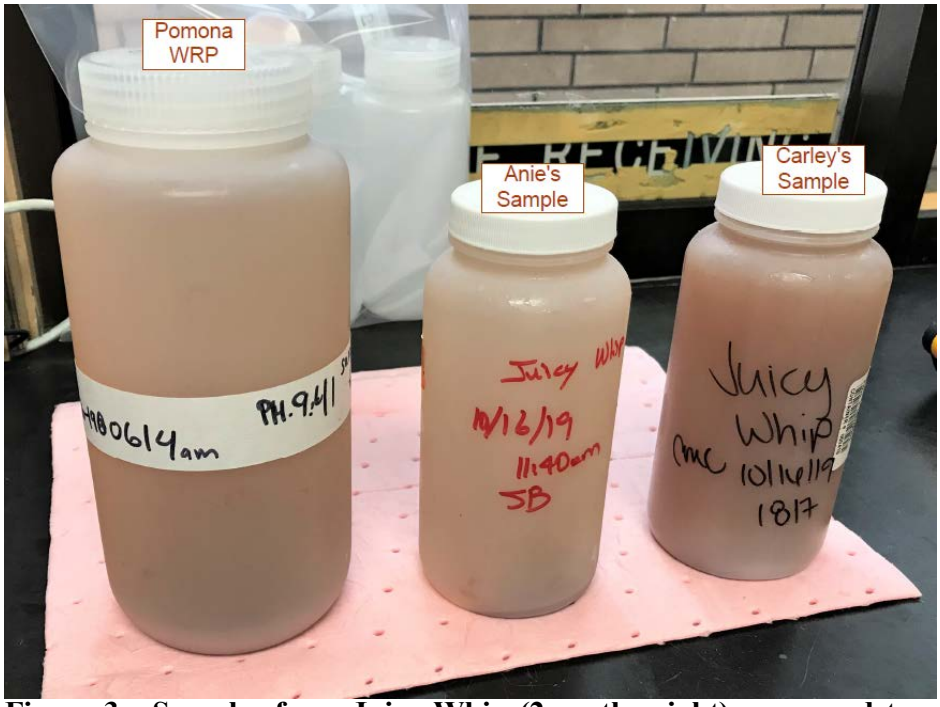

Figure 3: Samples from Juicy Whip (2 on the right) compared to a sample taken from the Pomona WRP. Note the very similar color.

Juicy Whip Inc IW 16648 8100 GPD
1668 Curtiss Court
Laverne, CA 91750

Anonymous Tip Alleging Illicit Dumping of Waste Automotive Coolant in Compton

On Monday, 10-21-19 at 1408 hours, Supervising IW Inspector John Boyd received a telephone call from California State Water Board Environmental Scientist and Compliance Coordinator Lala Kabadian. Kabadian reported that the Water Board had received an anonymous tip on 10-15-19 in which the tipster stated that employees at JC General Auto Repair, located at 145 E. Alondra Boulevard in Compton, were routinely dumping used/spent automotive coolant into a toilet. Disposing of this material to the sewer is prohibited. This information was referred to Area IW Inspector Nat Pengphol for follow-up.

JC General Auto Repair FID 9255726 0 GPD
145 E. Alondra Blvd.
Compton, CA, 90220

Area IW Inspector Nat Pengphol performed the follow-up investigation of the tip. His investigation found that while this small auto repair shop was accumulating limited (<50 gallons) of waste coolant and engine oil on-site, there was no evidence it was being discharged into the sewer nor storm drain, though how it was being stored and handled on-site, namely in multiple

small bottles and jugs, was clearly in violation of the regulations that apply to such wastes. A referral letter to the local Certified Unified Program Agency (CUPA), in this case the City of Compton Fire Department, was written and sent by the Districts on 11-5-19 in order to bring this situation to their attention.

Los Coyotes WRP High pH

On Saturday, 10-26-19 at 0955 hours, Los Coyotes WRP Treatment Plant Operator II Tom Jauregui notified Supervising IW Inspector David Sanchez that high pH wastewater was entering the Los Coyotes WRP. The influent pH reached a high of 9.66 at about 0933 hours, remaining at about 9.5 for about 75 minutes before slowly tapering off and returning to normal by 1500 hours (See Figure 4 below). Two 1.0-liter samples of the influent were collected by plant operators.

Figure 4: Los Coyotes WRP operational trends of 10-26-19 prior to and during the high pH influent event that started just after 0900 hours.

Team 2 IW Inspectors, led by Senior Inspector Chris Mendoza, investigated this incident. It was determined that the high pH was not due to routine caustic addition and crown spray activity. Seven potential industrial sources were inspected and one, Shasta Beverages Inc. in La Mirada was determined to be the likely source of the incident. The facility makes and bottles beverages. Review of effluent pH meter data at Shasta Beverages by Mendoza revealed that from 0400 hours until to 0800 hours on 10-26-19 a total of 12,205 gallons of wastewater was discharged with a pH range of 8.4 to 11.0. The estimated wastewater travel time from the Shasta facility to the WRP also aligned well with that expected for the discharge to have caused the WRP incident. On the morning of the incident the facility was performing standard operations including clean-in-place (CIP) equipment cleaning which includes the use of alkaline cleaning solutions, thus explaining the high pH of their wastewater discharge.

Shasta Beverages Inc. IW 15351 50,000 GPD
14405 E. Artesia Blvd.
La Mirada, CA 90638

Shasta Beverages has no upper pH limit on their industrial wastewater discharge and thus the discharge of elevated pH wastewater on 10-26-19 was not a violation of any numerical permit limits. Additionally, the Los Coyotes WRP was not impacted by the high pH influent, remaining stable during the incident. A Notice of Violation (NOV) was not issued to Shasta Beverages Inc.; however, inspectors did discuss with company managers the potential for an upper pH limit to be issued in the future. It was also noted that the company's permit is currently in-house for revision due to a large increase in wastewater flows due to significantly increased production at the facility due to the success of a new product, La Croix flavored waters. This

will provide an opportunity for an upper pH limit to be issued should further high pH incidents occur at the WRP due to discharges from Shasta Beverages Inc.

Gasoline Odor in Santa Fe Springs

On Monday, 10-28-19 at 1107 hours, Technical Services Manager Aaron Cothran of Pacific Star Chemical LLC in Santa Fe Springs called Supervising IW Inspector John Boyd and reported that there was a gasoline odor in a company restroom that he thought could be coming from the sewer system. He said that Districts' IW Inspector Jason Finn had just been on-site conducting an inspection and that after Jason left, they noticed the odor. This facility is a non-categorical industrial user that stores, dilutes and lightly mixes corrosive chemicals, such as acids (hydrochloric, nitric, citric and sulfuric) and alkaline materials (sodium hydroxide and sodium hypochlorite).

Pacific Star Chemical LLC IW 22048 1000 GPD
9051 Sorenson Ave.
Santa Fe Springs, CA 90670

Boyd contacted Finn and he returned to the facility within an hour with fellow Team 2 IW Inspectors Wei, Patel, and Mendoza. Over the following several hours and into the next week these inspectors, along with Inspector James McCurdy, investigated the incident to assess the odor and perform inspections of industrial facilities and sewer lines in the area as they looked to determine the size of area impacted by the odor and find its source. Pacific Star Chemical LLC is connected to a local sewer line that runs along Sorenson Avenue, that terminates only a few reaches up from the facility. The manhole near the facility had an LEL of 25% and the manhole at the terminus 20% during the incident. A local line pumping plant is located downstream of the Pacific Star site. Inspectors noted the pumping plant wet well headspace had an LEL of 0%, but a light chemical odor that may or may not have been related to the report was observed. The pumping plant receives wastewater from four separate sewer lines (see Figure 5). Upstream manholes on each of these sewer lines that could be safely accessed were determined and inspections performed to verify if the odor was in any of the local lines. No odor or elevated LEL conditions were noted in these lines. Inspections were then performed inspections at industrial facilities in the area. Although many people contacted at these facilities complained of the same odor, none appeared to be the source/cause of the odor.

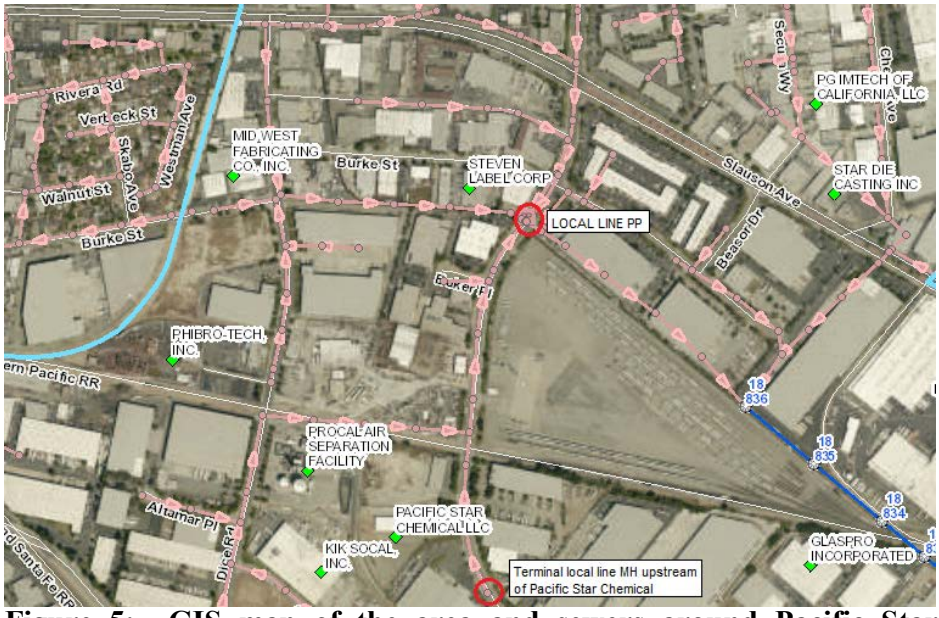

Figure 5: GIS map of the area and sewers around Pacific Star Chemical in Santa Fe Springs.

By the late afternoon on 10-28-19 the odor had completely dissipated. Inspectors have thus far been unable to determine a source of the odor on 10-28-19, despite performing

inspections at 17 upstream industrial facilities in the area, some of which were inspected multiple times. Additionally, inspectors returned to check the local sewers in the area several times over the next week to see if the odor/LEL condition had returned, which it had not. IW inspectors continue to be vigilant to a source for the odor report on 10-28-19.

Hydrogen Sulfide Gas Odor in Signal Hill

On Thursday, 10-31-19 at 1355 hours, Supervisor of Pumping Plant Maintenance & Operations Brian Pivovaroff of the Compton Yard Field Office called Supervising IW Inspector John Boyd and reported that the Districts had been notified earlier that afternoon of a possible sewer related odor/gas exposure incident in the City of Signal Hill near Manhole (MH) 29 0132 on the 8" Spring Street Sewer line. Pivovaroff reported that Fire Department paramedics and Hazardous Materials Crews had responded to a call from 1840 E. 29th Street in the city of Signal Hill due to a woman possibly exposed to hydrogen sulfide gas. Pivovaroff requested IW inspectors also respond as he suspected the source of the gas could be a company located immediately next door, System Transport Corp (FID#1747421, IW#16651). Pivovaroff also stated that an initial survey of the Spring Street Sewer that afternoon by one of his Lead Maintenance & Construction Workers, Rudy Romero, had found no unusual odors in the line.

Figure 6: GIS view of the facility and neighboring industrial facility, System Transport A Corp, where a sulfide gas exposure was reported on 10-31-19.

South Teams Supervising IW Inspector David Sanchez and Night Team Supervising IW Inspector Steve Sealy were made aware of the call and Sealy responded to the location on 10-31-19 with Night Team IW Inspector Jim Percy. Sealy and Percy's investigation, as well as a follow-up investigation completed over the following few days by Area IW Inspect Jason Finn confirmed the presence of moderate levels of hydrogen sulfide both in the sewage flow (5.0 mg/l) and headspace in the Spring Street Sewer on 10-31-19. Additionally, both Sealy and Percy could smell a sulfide odor "wafting" though the air from the industrial facility located next door to the complainant's building. The complainant was Ms. Kathy Alford, owner and operator of Kathy Alford Design Studio, a garden design business that does not perform any industrial operations or discharge any industrial wastewater. She said that one of her employees had been sickened by a strong sulfide odor, though at the time of Sealy's arrival the employee had already been checked and released with apparently no lasting effects from her exposure to the hydrogen sulfide odor/gas earlier. Alford stated that the sulfide odor has been present on and off for years, but that it was worse recently.

The investigation determined the source of the odors and the sulfides was a chemical transportation company located next door to the complainant's building, System Transport A Corp. This facility hauls a variety of chemical and petroleum liquid products in large tanker trucks and generates industrial wastewater from washing out the tankers periodically. Percy and Sealy found the wastewater remaining in the industrial wastewater sample box at this facility also tested high for dissolved hydrogen sulfides, in excess of 5.0 mg/l on 10-31-19, far above the

0.1 mg/l permit limit imposed by the Sanitation Districts. The cause of the high sulfides was determined to be the company holding their wastewater on-site for lengthy periods of time in order to try to reduce the flowrate of the discharge in a misguided attempt to stay within what company managers perceived was the 2,700 gallon per day flow limit shown on their industrial wastewater permit data sheet. However, the daily flowrate "limit" shown on the data sheet is not actually a limit to be observed on a daily basis, but instead an average daily flow that if exceeded over an entire year by more than 25% could cause a permit revision requirement. There is a 5-minute average peak flow rate limit listed on the data sheet as well, in this case 5 gpm for this facility, but that does not preclude the facility from discharging more than 2,700 gallons on any given day. Finn is working with the company to greatly reduce their wastewater holding practices to eliminate some or all holding of the wastewater in this manner that is the primary cause of the sulfides being present in the wastewater due to anaerobic degradation. This is likely to be accomplished by elimination or bypassing of the 20,000 gallon above-ground holding tank and several stages of the large in-ground clarifier currently in use at the facility. System Transport A Corp was issued an NOV for violating their dissolved sulfide limit. Managers at System Transport have thus far been cooperative in addressing the situation on a timely basis.

System Transport A Corp IW 16651 2700 GPD
1710 E 29th Street
Signal Hill, CA 90755

INDUSTRIAL WASTE SECTION
SUMMARY OF ACTIVITIES
FOR THE MONTH OF NOVEMBER 2019

TREATMENT PLANT/SEWER/OTHER INCIDENT INVESTIGATIONS

Citizen Odor Complaint in Whittier

On Thursday, 11-7-19 at 1232 hours and again at 1400 hours, Supervising IW Inspector John Boyd received two telephone calls from Long Beach Main Alarm Center Senior Pumping Plant Operators where two business managers complained of foul, "chemical" and "acetone acid" odors being emitted from a neighboring business for the past several years The first complainant, Mr. Drew Sones, stated that the odors were coming from a facility located at 12430 Whittier Boulevard in the City of Whitter. Sones further stated he was also concerned that the facility was illicitly discharging chemicals into drains as well. The second complainant restated the same odor conditions.

IW Inspectors, led by Night Team Supervising Inspector Steve Sealy, investigated this report, arriving on-site at Rugzy, Inc. the business located at the address given by Mr. Sones, at 1600 hours on 11-7-19. They determined that Rugzy, Inc. was the source of the "chemical" odors reported by Mr. Sones. The facility does rug cleaning, using various cleaners that include acetic acid and alkaline detergents. Inspectors spoke to a Rugzy's Owner, Mr. Gabriel Nalbandian, who stated they had used bleach earlier in the today, claiming though that this was atypical, around the same time the compliant was reported to the Alarm Center. While the facility was not doing cleaning operations during their inspection, inspectors noted there was still a strong chemical odor present in the production area. The owner stated that workers use respirators to minimize exposure to chemicals and their odors. Inspectors noted the facility also had what appeared to be recently installed rooftop vent fans. While these fans may be helpful to workers inside the facility, its suspected they may increase the intensity of the odor neighbors are experiencing. No violations of the facility's industrial wastewater permit were noted.

Rugzy, Inc. IW 21378 1500 GPD
12430 Whittier Boulevard
Whittier, CA 90602

Figure 1: Powered rooftop exhaust vents at Rugzy Inc.

In a follow-up conversation with Mr. Sones on 11-8-19, Boyd told him the Districts' inspectors had responded to his complaint and their inspections had confirmed the presence of the foul/chemical odors associated with the rug cleaning operations at Rugzy Inc. However, requiring the company to stop the nuisance odors was outside the legal jurisdiction of the Sanitation Districts. Sones asked which government agency might have such jurisdiction. Boyd advised him he could file nuisance odor complaints with the City of Whittier (code enforcement) and/or the South Coast Air Quality Management District (SCAQMD). Sones said he'd already filed complaints with the city code enforcement department with no satisfactory resolution, but would now contact the SCAQMD.

Scale and Solids in the Orr and Day Road Trunk in Santa Fe Springs

On Wednesday, 11-13-19 at 1445 hours, Supervisor of Sewer Maintenance Bill Balas notified Supervising IW Inspector David Sanchez of scaling and solids build up in Manhole (MH) 18 0207 on the 27" diameter Orr and Day Road trunk sewer in Santa Fe Springs (see Figures 2-4). Balas stated the manhole had been requiring more frequent cleaning over the last several years, with the most recent cleaning yielding an excessive volume of "scale" and debris.

Figure 2: Pieces of the scale retrieved from the sewer.

Figure 3: Side view of the scale.

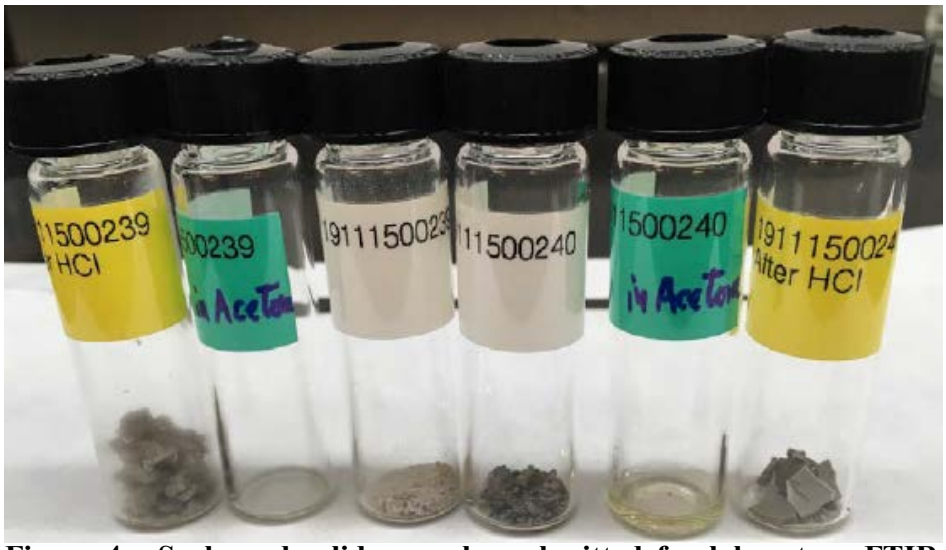

Figure 4: Scale and solids samples submitted for laboratory FTIR analysis (191115000239 and 19111500240).

The investigation of this report has thus far not yielded a likely source of the scale and solids despite IW Inspectors on both the day and night shifts performing inspections at 16 industrial facilities upstream of MH 18 0207 (see Figure 5). Several of these facilities were inspected multiple times. Sample analysis indicates the scaling and solids are primarily comprised of calcium carbonate, a common scale encountered in the sewer systems. However, it was noted that silica was also present in the scale. Senior IW Inspector Chris Mendoza found no scaling present at MH 18 0214. This may indicate the source of the scaling is located downstream of MH 0214, but it does not preclude the possibility that the mixing of two or more wastewaters could create the critical conditions for scale-causing material to precipitate. Thus, one of those components could be from a source upstream of MH 0214. Also, review of sewer cleaning records and past incident reports indicates that scaling in this section of the Orr and Day Road Trunk has likely been occurring since at least 2004. IW Inspectors are continuing to investigate this incident at a high level.

Figure 5: Annotated GIS map showing the location of the manhole where sewer maintenance crews noted scale and solids (MH 18 0207), as well as trunk and local sewers lines upstream of that location and the industrial facilities located in the area. A red diamond indicates those industrial facilities inspected as part of this investigation.

Los Coyotes WRP Dark Colored Influent

On Wednesday, 11-27-19 at 0900 hours Los Coyotes WRP TPO II Tom Jauregui notified Team 2 IW inspectors of dark colored influent entering the WRP. The pH of the wastewater was recorded at 7.6 and operators stated the WRP was operationally unaffected by the colored wastewater at that time. Two one-liter samples of the dark colored influent were collected by operators. Jauregui also noted that he was aware two stop logs had been removed the previous day on the J.O. "A"-1A Los Coyotes WRP Interceptor trunk sewer at MH 02A0934 and on the Norwalk Extension trunk sewer at MH 02 2443.

Team 2 Senior IW Inspector Chris Mendoza, and IW Inspectors Jason Finn and Tingting Wei responded to the report. Inspectors observed dark colored wastewater at MH 02A1282 on 11-27-19 on the 78" LC WRP Interceptor, indicating the color was in the interceptor line which serves areas north and west of the WRP as opposed to in the J.O. 'F' lines that bring flow to the plant from the areas north and east of the WRP. The stoplogs that were removed the previous day had been in place for several months due to the need to reduce flows into the WRP for work being done in WRP Unit 2. WRP treatment processes were unaffected by the presence of the color, which was removed completely in the primary and secondary treatment processes.

Inspectors were unable to determine a definitive source, industrial or otherwise, for the dark colored material, but speculate that the removal of the stoplog on the interceptor may have caused solids that built in the line to be dislodged, causing the dark-colored wastewater observed by operators. It was noted that ferric chloride solution is also routinely added to the interceptor at MH 02A1158 by the Districts for sulfide control. It's possible that due to the stop log being in place, solids created by the ferric solution addition may have built up in the line, only to be dislodged en masse when the stop log was removed.

Anonymous Tip Alleging Illicit Dumping at Chemtrans in Gardena

On Friday, 11-29-19 at 1800 hours, Senior Pumping Plant Alarm Center Operator Walt Hodgson called Supervising IW Inspector John Boyd and notified him that an anonymous tipster had called in to report that Chemtrans in Gardena was "still" illegally dumping waste. The tipster also sounded angry and stated that this was his second call to report this, having called in the previous day with the same claim with no apparent response from the Districts. Hodgson told Boyd he thought the tipster was likely a company employee. Hodgson confirmed to Boyd that the tipster had in fact called in the previous day. However, instead of forwarding the tipster's information to Industrial Waste inspection staff, the operator on duty had assumed the call was regarding an illicit discharge into the storm drain system (it was raining heavily at the time of the call, which was on Thanksgiving Day) and as such, advised the caller to notify the Los Angeles County Department of Public Works since they are the agency that regulates storm water discharges.

Chemtrans IW 12874 50,000 GPD
14700 S. Avalon Boulevard
Gardena, CA 90248

Senior IW Inspector Bill Barnum responded immediately on 11-29-19 after being made aware of the situation, arriving on-site at 1925 hours, about 90 minutes after the tipster's call on 11-29-19. Chemtrans is a medium sized facility with 16 employees that receives, treats and discharges non-hazardous liquid wastes, generally from the food manufacturing industry. The company also operates a commercial tanker truck washing service on-site. The liquid wastes they receive are subject to the Federal Centralized Waste Treatment (40 CFR Part 437 Subpart C-Organic Wastewater) categorical regulation while the wastewater generated from the tanker trunk washing operations is subject to the Federal Transportation Equipment Cleaning Point Source Category (40 CFR 442 Subpart A Tank Trucks and Intermodal Tank Containers).

Upon arrival Barnum noted that there was no one on-site and the main gate was locked with no evidence of any ongoing operations seen. However, a check of the sewer manhole immediately downstream of the facility indicated the facility was still discharging industrial wastewater at a rate of about 20 gpm. Barnum then notified the company's Operations Manager, Mr. Thaddeus Carroll, by telephone that he was on-site and intended to enter the facility using the Districts' A297 key/lock on the main gate. Note that a permit requirement for this facility is

that such access be provided because it is not unusual for the company to continue to discharge after all their employees have left for the evening. Mr. Carroll arrived 15 minutes later and accompanied Barnum as he inspected the facility. Although Barnum found no hard evidence to support the tipster's allegation of "illegal dumping," he did find that that the company was running a city water hose such that the water was being used to illegally dilute their industrial wastewater discharge. Mr. Carroll immediately shut off the flow to the treatment system and sewer. Barnum then issued a written Notice of Violation for violating Section 406F of the Wastewater Ordinance (discharge of water added for the purpose diluting wastes which would otherwise exceed applicable maximum concentration limitations). When asked about the dilution flow, Mr. Carroll provided no explanation. Barnum suspects one of the company's pieces of pretreatment equipment, an ultrafiltration unit, is clogging easily and company operators are using the city water to dilute the wastewater influent to the UF unit to prevent the clogging. Barnum took samples of the discharge. Note that subsequent analysis of the sample revealed on only low levels of contamination, well below all limits. For example, the highest heavy metal concentration in the sample was chromium at 0.20 mg/l, with a limit of 10 mg/l. Chemtrans has a long history of various violations and noncompliance, IW Inspectors continue to monitor the facility closely.