

# Law Office of Jack Silver

708 Gravenstein Hwy North, Suite 407 Sebastopol, CA 95472-2808  
Phone 707-528-8175 Email JSilverEnvironmental@gmail.com



**RECEIVED**

**JUN 03 2025**

**CITY OF SANTA ROSA  
CITY MANAGER'S OFFICE**

***Via Certified Mail –  
Return Receipt Requested***

May 30, 2025

Maraskeshia Smith - City Manager  
Members of the City Council  
City of Santa Rosa  
100 Santa Rosa Ave. Room 10  
Santa Rosa, CA 95404

Jennifer Burke - Director of Santa Rosa Water  
Sean McNeil - Deputy Director of Environmental Services  
Head of Agency  
Laguna Subregional Water Reclamation System  
4300 Llano Road  
Santa Rosa, California 95407

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

Dear Ms. Smith, Ms. Burke, Mr. McNeil, Members of the City Council and Head of Agency:

**STATUTORY NOTICE**

This Notice is provided on behalf of California River Watch ("River Watch") with regard to violations of the Clean Water Act ("CWA" or "Act"), 33 U.S.C. § 1251 *et seq.*, that River Watch alleges are occurring through the ownership and operation of the Laguna Subregional Water Reclamation System, Laguna Treatment Plant ("Facility") and associated wastewater collection system.

River Watch hereby places the City of Santa Rosa ("City"), as owner and operator of the Facility and associated wastewater collection system, on notice that following the expiration of sixty (60) days from the date of this Notice, River Watch will be entitled under CWA § 505(a), 33 U.S.C. § 1365(a), to bring suit in the U.S. District Court against the City for continuing violations of an effluent standard or limitation pursuant to CWA § 301(a), 33 U.S.C. § 1311(a), and the North Coast Regional Water Quality Control Board ("RWQCB") Water Quality Control Plan ("Basin Plan"), as the result of violations of the City's National Pollution Discharge Elimination System ("NPDES") Permit.

The CWA regulates the discharge of pollutants into navigable waters. The statute is structured in such a way that all discharges of pollutants are prohibited with the exception of enumerated statutory provisions. One such exception authorizes the City, which has been issued a permit pursuant to CWA § 402, 33 U.S.C. § 1342, to discharge designated pollutants at certain levels subject to certain conditions. The effluent discharge standards or limitations specified in a NPDES permit define the scope of the authorized exception to the CWA § 301(a), 33 U.S.C. § 1311(a) prohibition such that violation of a permit limit places a discharger in violation of the CWA. River Watch alleges the City is in violation of the CWA by violating the terms of its NPDES Permit.

The CWA provides that authority to administer the NPDES permitting system in any given state or region can be delegated by the Environmental Protection Agency ("EPA") to a state or to a regional regulatory agency provided that the applicable state or regional regulatory scheme under which the local agency operates satisfies certain criteria (*see* 33 U.S.C. § 1342(b)). In California, the EPA has granted authorization to a state regulatory apparatus comprised of the State Water Resources Control Board ("SWRCB") and several subsidiary regional water quality control boards to issue NPDES permits. The entity responsible for issuing NPDES permits and otherwise regulating the City's operations in the region at issue in this Notice is the RWQCB.

While delegating authority to administer the NPDES permitting system, the CWA provides that enforcement of the statute's permitting requirements relating to effluent standards or limitations imposed by the Regional Boards can be ensured by private parties acting under the citizen suit provision of the statute (*see* CWA § 505, 33 U.S.C. § 1365). River Watch is exercising such citizen enforcement to enforce the City's compliance with the CWA.

## **NOTICE REQUIREMENTS**

The City's NPDES Permit requires that it comply with the RWQCB Basin Plan which provides that collection, treatment, storage, and disposal systems shall be operated in a manner that precludes endangerment to the public or the environment from contact with wastewater.

In accordance with 40 C.F.R. § 122.41(e), the City's NPDES Permit contains the following standard condition:

*"The Permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) that are installed or used by the Permittee to achieve compliance with the conditions of this [Permit]. Proper operation and maintenance also includes adequate laboratory controls and appropriate quality assurance procedures. This provision requires the operation of backup or auxiliary facilities or similar systems that are installed by a Permittee only when necessary to achieve compliance with the conditions of this [Permit] (40 C.F.R. § 122.41(e))."* NPDES Permit Attachment D (Standard Provisions), Section I (Standard Provisions – Permit Compliance), Subsection D (Proper Operation and Maintenance).

All dischargers are required to operate and maintain wastewater collection, treatment, and disposal facilities in a manner to ensure that all facilities are adequately staffed, supervised, financed, operated, maintained, repaired, and upgraded as necessary, in order to provide adequate



and reliable transport, treatment, and disposal of all wastewater from both existing and planned future wastewater sources under the discharger's service responsibilities.

Based on a review of the City's information and reports, the City has failed to properly operate and maintain the Facility and associated collection system to achieve compliance with the conditions of its NPDES Permit. Specifically, the City has failed to adequately assess the condition of, and undertake timely repair or replacement of, certain force mains, gravity sewer pipes, pump stations, outfalls, and transport and storage structures, despite awareness that the infrastructure is leaking, past its useful life, or otherwise required replacement or repairs.

The CWA requires that any Notice regarding an alleged violation of an effluent standard or limitation, or of an order with respect thereto, shall include sufficient information to permit the recipient to identify the following:

## **1. Standard, Limitation, or Order Alleged to Have Been Violated**

The order which is the subject of this Notice is NPDES No. CA0022764, "*Waste Discharge Requirements and Water Recycling Requirements for the City of Santa Rosa, Santa Rosa Regional Water Reuse System, Laguna Treatment Plant, Sonoma County*" ("NPDES Permit"). River Watch has identified specific violations of the NPDES Permit including violations of receiving water limitations, effluent limitations, and raw sewage discharges, in addition to failure by the City to either comply with or provide evidence that it has complied with all the terms of its NPDES Permit.

## **2. Activity Alleged to Constitute a Violation**

River Watch contends the City has violated the Act as described in this Notice, and contends these violations are continuing or have a likelihood of occurring in the future.

### **A. Violations of Effluent Limitations and Discharge Prohibitions**

The City's NPDES Permit prohibits it from causing a violation of any applicable water quality standard for waters of the United States adopted by the RWQCB or the EPA as required by the CWA and applicable regulations. A water quality standard consists of a beneficial use designation for a water body and an associated water quality objective to protect that use designation. 33 U.S.C. § 1313(c); 40 C.F.R. § 131. Water quality objectives can be numeric, such as a limit or level of constituents or pollutants, or narrative, such as a condition that a water body must meet.

At all times relevant to this Notice, the RWQCB and EPA have adopted water quality standards for the waters of the United States into which sanitary sewer overflows ("SSOs") or effluent are discharged. The RWQCB sets forth its standards in its Basin Plan, and the EPA sets forth its standards in the California Toxics Rule ("CTR") (40 C.F.R. § 131.38). River Watch has identified both SSOs and effluent violations of the City's NPDES Permit and the Basin Plan. Each exceedance of a water quality objective is a separate violation of the CWA.

River Watch's review of the City's Self-Monitoring Reports identifies violations of effluent limitations imposed under its NPDES Permit. River Watch further observes that the City

fails to include its effluent compliance in its reporting to the California Integrated Water Quality System ("CIWQS").

B. Violations of Receiving Water Limitations and Impacts to Beneficial Uses

Compliance with the Receiving Water Limitations specified in NPDES Permit Section V is essential to ensuring no prohibited pollution unreasonably affects the beneficial uses of the Laguna de Santa Rosa and Santa Rosa Creek. In order to protect these beneficial uses, the City is required by its NPDES Permit to ensure that discharges shall not cause the listed limitations to be exceeded. River Watch finds insufficient information in the public record demonstrating the City has monitored for and complied with these receiving water standards.

C. SSOs, Inadequate Reporting of Discharges, Failure to Warn, Failure to Mitigate Impacts, Wastewater Collection System Subsurface Discharges, Failure to Maintain Adequate Contingency Plan and Spill Prevention Plan, Discharges of Waste to Receiving Waters

River Watch is understandably concerned as to the effects of both surface and underground SSOs on critical habitat in and around the diverse and sensitive ecosystem of the Facility. The NPDES Permit lists the "Basin Plan Beneficial Uses" (Attachment F – Fact Sheet, Table F-5), of the Laguna de Santa Rosa (within the Laguna Hydrologic Subarea of the Middle Russian River Hydrologic Area) and Santa Rosa Creek (within the Santa Rosa Hydrologic Subarea of the Middle Russian River Hydrologic Area) - both waters of the United States.

1. SSOs

SSOs, in which untreated sewage is discharged above ground from the wastewater collection system prior to reaching the Facility, are alleged to have occurred both on the dates identified in the CIWQS Interactive Public SSO Reports and on the dates when no reports were submitted to CIWQS by the City, all in violation of the CWA.

Numerous causes for SSOs include storm water inflow and/or groundwater infiltration (I/I), defects in sewer lines, root intrusion, and blockages due to grease and rags. Currently, the City's wastewater collection system has insufficient capacity to handle peak wet weather flows. During heavy storms, the system becomes surcharged and untreated sewage overflows at various locations eventually draining to the Laguna de Santa Rosa and Santa Rosa Creek. These SSOs impact the water quality and beneficial uses of these waters of the United States. Possible adverse effects on water quality and beneficial uses as a result of SSOs include the following:

- Adverse impacts to fish and aquatic biota caused by bio-solids deposition, oil and grease, and toxic pollutants common in sewage (such as heavy metals, pesticides, personal care products, and pharmaceuticals).
- Creation of a localized toxic environment in the water column as the result of the discharge of oxygen-demanding pollutants that lower dissolved oxygen, and elevated ammonia concentration which is a fish toxicant.



- Impairment of water contact recreation and non-contact water recreation and harm to fish and wildlife as a result of elevated bacteria levels including pathogens.

A review of the City's CIWQS Spill Public Report – Summary Page (Attachment A) identifies **68 SSOs**, resulting in **123,873** gallons of raw sewage discharged into the environment. Of this total volume, the City acknowledges at least **67,992** gallons, or **54%** of the total, reached a surface water. River Watch observes that the City's CIWQS reporting may be inaccurate in that the City reports that only 18,275 gallons was recovered with 67,992 gallons discharged to surface waters. That appears to leave 37,606 gallons of raw sewage unaccounted for which can be assumed to have been discharged to surface waters. As such, a review of the City's records would indicate an even greater percentage of SSOs reached a drainage to a surface water or a surface water itself, posing both a nuisance pursuant to Calif. Water Code § 13050(m), and an imminent and substantial endangerment to public health and the environment.

The City's CIWQS SSO Spill Public Report – Spill Event ID(s) Page (Attachment B) specifically details the SSOs reported as having reached a water of the United States.

## 2. Inadequate Reporting of Discharges

The City's NPDES Permit requires full and complete reporting of SSOs as essential to gauging their impact on public health and the environment. The City's SSO Reports, which should reveal critical details about each of these SSOs, lack responses to specific questions that would identify the causes and the potential repairs ensuring these violations would not recur. In addition, River Watch's expert believes many of the SSOs reported by the City as partially reaching a surface water did so in greater volume than stated. River Watch's expert also believes that a careful reading of the time when the City received notification of an SSO, the time of its response, and the time at which the SSO ended, too often appear as unlikely estimations.

River Watch members have witnessed several sections of the City's wastewater collection system inundated by flooding in which diffusion causing SSOs occurred. The City, however, has not reported these SSOs in its CIWQS reports. These unreported SSOs are alleged to have occurred November 20-23, 2024. Inundation and sewage releases were observed at Pierson Street, West 6<sup>th</sup> Street, Airway Drive, and Marin Drive.

## 3. Failure to Warn

The City is required by its NPDES Permit to inform and notify the public of all relevant times when and where SSOs or effluent exceedances occur, particularly when the public could come into contact with sewage or poorly treated effluent. Compliance with public notification requirements is essential to alerting the public as to the risks present in water contact areas while people are recreating, and to prevent individuals from coming into contact with untreated sewage which poses a risk of gastrointestinal illness, respiratory illness, and eye, ear, skin, and wound infections.

Specifically, the City is required, and has been required at all times relevant to this Notice, to post warning signs at public locations where water contact recreation occurs whenever an SSO takes place that could affect recreational users at those locations. Based on the analysis of the

City's reporting, River Watch contends the City is understating the significance of the impacts of its SSOs by failing to uniformly post visible health warning signs for discharges reaching a surface water.

#### 4. Failure to Mitigate Impacts

NPDES Permit Attachment D (Standard Provisions), Section 1 (Standard Provisions – Permit Compliance), Subsection 1.C (Duty to Mitigate) states: *"The Permittee shall take all reasonable steps to minimize or prevent any discharge in violation of this Order that has a reasonable likelihood of adversely affecting human health or the environment. (40 C.F.R. § 122.41(d).)"*

River Watch contends the City is failing to adequately mitigate the impacts of its SSOs. In addition to compliance with the requirements of its NPDES Permit, the City is subject to the requirements of the *General Requirements for Sanitary Sewer Systems, Statewide Waste Discharge Requirements*, Order WQ 2022-0103-DWQ ("Statewide WDR"), governing the operation of sanitary sewer systems. The Statewide WDR requires the City to take all feasible steps, and perform necessary remedial actions, following the occurrence of an SSO including limiting the volume of waste discharged, terminating the discharge, and recovering as much of the wastewater as possible. Further remedial actions include intercepting and re-routing of wastewater flows, vacuum truck recovery of the SSO, cleanup of debris at the site, and modification of the collection system to prevent further SSOs at the site.

In addition to the requirements of the Statewide WDR, River Watch contends a critical remedial measure of compliance with the CWA is the performance of adequate sampling to determine the nature and impacts of SSOs on the environment. Underestimating SSOs which reach surface waters as identified in this Notice must be addressed by the City. The EPA's *Report to Congress on the Impacts and Control of CSOs and SSOs* (EPA 833-R-04-001) identifies SSOs as a major source of microbial pathogens and oxygen depleting substances. River Watch finds no record indicating the City has performed any analysis of the impact of its SSOs on aquatic or wildlife habitat, nor any evaluation of the measures needed to restore water bodies designated as habitat from the impacts of SSOs.

#### 5. Wastewater Collection System Subsurface Discharges

It is a well-established fact that exfiltration caused by pipeline cracks, and other structural defects in a collection system result in discharges to adjacent surface waters via underground hydrological connections. River Watch is concerned by the absence in the public record of reports by the City confirming that no untreated sewage is discharged from cracks, displaced joints, eroded segments, etc., in the City's wastewater collection system into groundwater hydrologically connected to surface waters including, but not limited to, the Laguna de Santa Rosa and Santa Rosa Creek. Surface waters become contaminated with pollutants including human pathogens. Chronic failures in a collection system pose a substantial threat to public health.

Studies tracing human markers specific to the human digestive system in surface waters adjacent to defective sewer lines in other systems have verified the contamination of the adjacent waters with untreated sewage. Evidence of exfiltration can also be supported by reviewing mass



balance data, I/I data, video inspection, as well as tests of waterways adjacent to sewer lines for nutrients, human pathogens, and other human markers such as caffeine. Any exfiltration found is a violation of the City's NPDES Permit and therefore a violation of the CWA.

6. Failure to Maintain Adequate Contingency Plan and Spill Prevention Plan

The City's NPDES Permit requires the City to maintain a Contingency Plan for its wastewater collection system in order to ensure that existing facilities and appurtenances remain in, or are rapidly returned to, operation in the event of a process failure or emergency incident. The NPDES Permit requires the City to include provisions in its Contingency Plan related to the following: emergency standby power; expeditious action to repair failures of, or damage to, equipment and sewer lines; and, programs for maintenance, replacement and surveillance of physical condition of equipment, facilities and sewer lines.

The City's NPDES Permit requires the City to maintain a Spill Prevention Plan in order to prevent accidental discharges from the collection system and minimize the effects of such discharges. This provision requires the City to identify possible sources of accidental discharges, untreated or partially treated waste bypass, and polluted drainage; evaluate the effectiveness of present facilities and procedures; predict the effectiveness of any proposed facilities and procedures; and provide an implementation schedule containing interim and final dates when the proposed facilities and procedures will be constructed, implemented, or operational.

The City's NPDES Permit requires that the City's collection, treatment, storage, and disposal systems shall be operated in a manner that precludes public contact with wastewater.

At all times relevant to this Notice, the City's Contingency Plan failed to satisfy these requirements by omitting provisions related to emergency standby power; expeditious action to repair failures of, or damage to, equipment and sewer lines; or programs for maintenance of integral assets such as pump stations, gravity sewer mains, and force mains. For example, the City's Contingency Plan does not describe any specific procedures to ensure that assets such as pump stations, gravity mains, or force mains are expeditiously repaired and returned to service. In addition, the Contingency Plan includes no specific procedures, whether through stockpiling of necessary physical resources to permit quick repairs or through specific training, to prepare for different reasonably foreseeable failure scenarios, such as earthquakes, electrical outages and the like.

At all times relevant to this Notice, the City's Contingency Plan failed to satisfy the requirements in its NPDES Permit as a result of its failure to contain adequate spill response measures to preclude public contact with wastewater.

At all times relevant to this Notice, the City's Spill Prevention Plan failed to satisfy the requirements applicable to the City's NPDES Permit because it failed to identify possible sources of accidental discharge, untreated or partially treated waste bypass, and polluted drainage; failed to evaluate the effectiveness of present facilities and procedures and state when they became operational; failed to predict the effectiveness of the proposed facilities and procedures; and failed to provide an implementation schedule containing interim and final dates when the proposed facilities and procedures will be constructed, implemented, or operational.

7. Discharges of Waste to Receiving Waters During the Annual "Non-Discharge Season" (May 15 – September 30)

The City maintains numerous ponds in which it stores and releases treated wastewater. Mass balance analysis reveals these ponds leak into the surrounding ground, groundwater, and adjacent waters, including the Laguna de Santa Rosa in violation of Sections III.I. and IV.5. of the City's NPDES Permit. Leaking ponds create pollution, as well as contamination or nuisance as defined by California Water Code § 13050. As the ponds leak continually, the City is discharging during the annual discharge prohibition period of May 15 through September 30. As a result, the City is violating its permit conditions each and every day during the non-discharge season that the ponds contain wastewater.

The City maintains an extensive reuse program which includes approximately 6,236 acres of urban and agricultural land irrigated with treated wastewater. Many of these lands lie adjacent to waters of the United States including the Laguna de Santa Rosa. The City has a history of discharges of wastewater from its reclamation sites during the discharge prohibition period of May 15 through September 30 including, but not limited to, properties assessed to the following: James Michael McCallum (Glenbrook HOA), Marco Antonio LLC, Salvation Army, Simone LLC, Chang Income Property Partnership LP, Fomasi, and Deborah Noel.

**3. The Person or Persons Responsible for the Alleged Violation**

The entity responsible for the alleged violations identified in this Notice is the City of Santa Rosa and those of its employees responsible for compliance with the CWA and with any applicable state and federal regulations and permits.

**4. The Location of the Alleged Violation**

The locations of the various violations alleged in this Notice are identified in records created and/or maintained by or for the City which relate to the Facility and associated wastewater collection system, as further described in this Notice.

**5. Range of Dates During Which the Alleged Activity Occurred**

The range of dates covered by this Notice is May 30, 2020, to the present. This Notice also includes all violations of the CWA by the City which occur after the range of dates covered by this Notice up to and including the time of trial. Some violations are continuous, and therefore each day constitutes a violation.

**6. Name, Address, and Telephone Number of the Person Giving Notice**

The entity giving notice is California River Watch, referred to throughout this notice as "River Watch," an Internal Revenue Code § 501(c)(3) nonprofit, public benefit corporation duly organized under the laws of the State of California. Its headquarters and main office are located in Sebastopol. Its mailing address is 290 South Main Street, #817, Sebastopol, CA 95472. River Watch is dedicated to protecting, enhancing, and helping to restore surface waters and ground waters of California including coastal waters, rivers, creeks, streams, wetlands, vernal pools,



aquifers and associated environs, biota, flora and fauna, and educating the public concerning environmental issues associated with these environs.

River Watch may be contacted via email at [US@criverwatch.org](mailto:US@criverwatch.org), or through its attorneys. River Watch has retained legal counsel with respect to the issues raised in this Notice. All communications should be directed to the following counsel:

Jack Silver, Esq.  
Law Office of Jack Silver  
708 Gravenstein Hwy. North, #407  
Sebastopol, CA 95472  
Tel. (707) 528-8175  
Email: [jsilverenvironmental@gmail.com](mailto:jsilverenvironmental@gmail.com)

David Weinsoff, Esq.  
Law Office of David J. Weinsoff  
138 Ridgeway Avenue  
Fairfax, CA 94930  
Tel. (415) 460-9760  
Email: [david@weinsofflaw.com](mailto:david@weinsofflaw.com)

### **RECOMMENDED REMEDIAL MEASURES**

River Watch looks forward to meeting with the City's staff to tailor remedial measures to the specific operation of the Facility and associated wastewater collection system. In advance of that conversation, River Watch identifies the following general remedial categories that will advance compliance with the CWA and the Basin Plan, and help economize the time and effort the parties need to resolve their concerns:

1. A full condition assessment of the wastewater collection system including setting timelines for repairing or replacing significantly defective assets such as sewer lines, maintenance holes and pump/lift stations.
2. Mitigation of the effects of SSOs.
3. Adequate public and worker safety, including protocols to minimize exposure to infectious vectors.
4. Agreement to continue to not use chemical root control.
5. Repairs to the treatment system to eliminate ongoing effluent violations.
6. Consideration of a Supplemental Environmental Project in lieu of penalties.
7. In the event the City intends to provide municipal sewage as fertilizer, the advance initiation of monitoring for PFAS (per- and polyfluoroalkyl substances) commonly referred to as "Forever Chemicals," consistent with EPA, SWRCB, and RWQCB requirements.
8. Consistent with Article X, Section 2 of the California Constitution and California Water Code Section 100 which prevents the waste or unreasonable use of water, implementation of programs and projects providing for the recycling and/or reuse of treated wastewater.

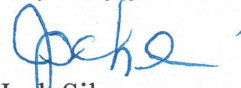
## CONCLUSION

The violations set forth in this Notice affect the health and enjoyment of members of River Watch who reside and recreate in the affected community and may use the affected watershed for recreation, fishing, hiking, photography or nature walks. Their health, use and enjoyment of this natural resource is specifically impaired by the alleged violations of the CWA as set forth in this Notice.

CWA §§ 505(a)(1) and 505(f) provide for citizen enforcement actions against any "person," including a governmental instrumentality or agency, for violations of NPDES permit requirements and for un-permitted discharges of pollutants. 33 U.S.C. §§ 1365(a)(1) and (f), 33 U.S.C. § 1362(5). An action for injunctive relief under the CWA is authorized by 33 U.S.C. § 1365(a). Violators of the Act are also subject to an assessment of civil penalties of up to \$68,445.00 per day/per violation for all violations pursuant to Sections 309(d) and 505 of the Act, 33 U.S.C. §§ 1319(d), 1365. See also 40 C.F.R. §§ 19.1 – 19.4. River Watch believes this Notice sufficiently states grounds for filing suit in federal court under the "citizen suit" provisions of CWA to obtain the relief provided for under the law.

The CWA specifically provides a **60-day** notice period to promote resolution of disputes. River Watch strongly encourages the City to contact counsel for River Watch within **20 days** after receipt of this Notice to initiate a discussion regarding the allegations detailed herein. In the absence of productive discussions to resolve this dispute, River Watch will have cause to file a citizen's suit under CWA § 505(a) when the 60-day notice period ends.

Very truly yours,



Jack Silver

:JS

Attachments

Service List – *Via U.S. Mail*

Teresa L. Stricker - City Attorney  
Office of the City Attorney  
100 Santa Rosa Ave. Room 8  
Santa Rosa, CA 95404

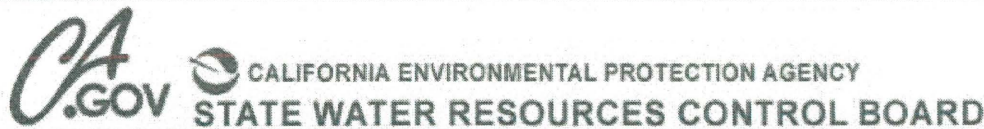
Lee M. Zeldin - Administrator  
U.S. Environmental Protection Agency  
1200 Pennsylvania Ave. NW  
Mail Code 1101A  
Washington, D.C. 20460-0002



Josh F.W. Cook - Regional Administrator  
U.S. Environmental Protection Agency  
Pacific Southwest, Region 9  
75 Hawthorne St.  
Mail Code ORA-1  
San Francisco, CA 94105-3941

Eric Oppenheimer - Executive Director  
State Water Resources Control Board  
P.O. Box 100  
Sacramento, CA 95812-0100

ATTACHMENT A



California Integrated Water Quality System Project (CIWQS)

Spill Public Report – Summary Page

The information on this summary page is the result of your search. These results correspond to the following search criteria:

- SEARCH CRITERIA: [\[REFINE SEARCH\]](#)
- Agency (Santa Rosa City Utilities Dept)
  - Spill Type (Category 1; Category 2; Category 3)

The information in this table does not include Category 4 spills, as defined in the Statewide Sanitary Sewer Systems General Order 2022-0103-DWQ ( [https://www.waterboards.ca.gov/board\\_decisions/adopted\\_orders/water\\_quality/2022/wqo\\_2022-0103-dwq.pdf](https://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2022/wqo_2022-0103-dwq.pdf) ).

More information about the Spill Public Report is found at the bottom of this page.

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[\[EXPORT THIS REPORT TO EXCEL\]](#)

[\[EXPORT ALL SPILL DETAILS TO EXCEL\]](#)

Region	Responsible Agency	Sanitary Sewer System	WDID	Total Number of Spills	Total Volume of Spills (gal)	Total Volume Recovered (gal)	Total Volume Reached Surface Water (gal)	Percent Recovered (%)	Percent Reached Surface Water (%)	Miles of Pressure Sewer	Miles of Gravity Sewer	Miles of Laterals	Number of Pump Stations	
1	Santa Rosa City Utilities Dept	Santa Rosa City CS	1SSO11491	68	123,873	18,275	67,992	14	54	6.52	571.10	0.0	17	Operational
				68	123,873	18,275	67,992			6.5	571.1	0.0	17.0	Performance

When assessing the performance of sanitary sewer systems regulated under the Statewide Sanitary Sewer Systems General Order, it is important to review spill reports in detail. There may be multiple individual spill event IDs that share the same location.

The search results on this summary page present summary data from individual spill reports submitted in the online CIWQS Sanitary Sewer System Database, meeting the search criteria selected. To determine if spill reports relate to a common failure point within the sanitary sewer system, the spill reports should be reviewed in detail by selecting a number under the "Total Number of Spills" column, corresponding to a specific sanitary sewer system.

The "Responsible Agency", or Enrollee, listed on a spill report is responsible for the spill described and should be contacted directly for questions related to that incident.

The current report was generated with data entered by Enrollees on the previous day.

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## ATTACHMENT B

California Home

Monday, February 10, 2025



## California Integrated Water Quality System Project (CIWQS)

## Spill Public Report – Spill Event ID(s) Page

Here is the detail page of your Sanitary Sewer System Spill Report search for selected Regional Board, county, responsible agency, or sanitary sewer system. These results correspond to the following search criteria:

SEARCH CRITERIA: [\[REFINE SEARCH\]](#)

- Agency (Santa Rosa City Utilities Dept)
- Spill Type (Category 1; Category 2; Category 3))
- Agency (Santa Rosa City Utilities Dept)
- Agency (Santa Rosa City Utilities Dept)

The table below presents important details from Enrollee-submitted certified spill events, as submitted through individual spill reports, which meet the search criteria selected on the Sanitary Sewer System (SSS) Spill Report Form. If data is not shown for a particular field, it means the Enrollee did not provide the information and was not required to do so. To view the entire spill report, select the corresponding "Spill Event ID".

DRILLDOWN HISTORY: [\[GO BACK TO SUMMARY PAGE\]](#)

REGION: 1

[\[VIEW PRINTER FRIENDLY VERSION\]](#)[\[EXPORT THIS REPORT TO EXCEL\]](#)

Event ID	Region	Responsible Agency	Sewer System	WDID	Spill Category	Spill Start Date	Spill Vol (gal)	Spill Vol Recovered (gal)	Spill Vol Reached Surface Water (gal)	System Failure Location	Spill Appearance Point
<a href="#">856496</a>	1	Santa Rosa City Utilities Dept	Santa Rosa City CS	1SSO11491	Category 1	2019-02-26 21:00	8,250	0	8,250	Private upper lateral was the point of spill but the capacity issue was in the trunk.	Lateral Clean Out (Private)
<a href="#">856633</a>	1	Santa Rosa City Utilities Dept	Santa Rosa City CS	1SSO11491	Category 3	2019-02-26 22:00	11	11	0	Spill accrued near trunk line that had surcharged during large storm event. Sewer was discharged from a mainline cleanout II2905 cleanout 13. Cleanout is at the end of 6" sewer main on Sharon Ct. The trunk line that surcharged has already been identified in wastewater master plan for replacement and upsizing. It is currently assigned to a CIP engineering team and is in design.	Other sewer system structure
<a href="#">864274</a>	1	Santa Rosa City Utilities Dept	Santa Rosa City CS	1SSO11491	Category 1	2020-01-17 15:32	2,325	203	2,122	Gravity Mainline	Manhole
<a href="#">864864</a>	1	Santa Rosa City Utilities Dept	Santa Rosa City CS	1SSO11491	Category 3	2020-02-14 09:05	13	13	0	A gripper plug had come apart and a peice of it became lodged in main.	Gravity Mainline;Other sewer system structure
<a href="#">874472</a>	1	Santa Rosa City Utilities Dept	Santa Rosa City CS	1SSO11491	Category 3	2021-06-03 17:30	190	84	0	Cut on bubbler tube.	Other sewer system structure
<a href="#">874989</a>	1	Santa Rosa City Utilities Dept	Santa Rosa City CS	1SSO11491	Category 3	2021-06-25 18:10	87	87	0	Gravity Mainline	Manhole
<a href="#">877297</a>	1	Santa Rosa City Utilities Dept	Santa Rosa City CS	1SSO11491	Category 3	2021-10-28 12:29	68	68	0	Gravity Mainline	Manhole

<a href="#">878184</a>	1	Santa Rosa City Utilities Dept	Santa Rosa City CS	1SSO11491	Category 1	2021-12-17 11:45	875	108	767	Gravity Mainline	Manhole
<a href="#">878946</a>	1	Santa Rosa City Utilities Dept	Santa Rosa City CS	1SSO11491	Category 1	2022-01-19 14:00	4,600	4,508	92	Gravity Mainline	Gravity Mainline,Manhole
<a href="#">882652</a>	1	Santa Rosa City Utilities Dept	Santa Rosa City CS	1SSO11491	Category 2	2022-08-07 13:00	3,614	0	0	Pump Station-Controls	Pump station
<a href="#">885997</a>	1	Santa Rosa City Utilities Dept	Santa Rosa City CS	1SSO11491	Category 3	2023-02-08 16:25	32	32	0	Gravity Mainline	Manhole
<a href="#">889974</a>	1	Santa Rosa City Utilities Dept	Santa Rosa City CS	1SSO11491	Category 1 Spill	2023-08-19 16:00	24,192	190	190	Gravity Mainline,Manhole	Gravity Mainline,Manhole
<a href="#">891022</a>	1	Santa Rosa City Utilities Dept	Santa Rosa City CS	1SSO11491	Monthly Category 3 Spill	2023-10-25 17:20	124	124		Gravity Mainline	Manhole
<a href="#">892423</a>	1	Santa Rosa City Utilities Dept	Santa Rosa City CS	1SSO11491	Monthly Category 3 Spill	2024-01-29 08:44	435	435		Siphon	Manhole
<a href="#">893918</a>	1	Santa Rosa City Utilities Dept	Santa Rosa City CS	1SSO11491	Monthly Category 3 Spill	2024-02-26 21:30	270	187		Gravity Mainline	Manhole
<a href="#">897633</a>	1	Santa Rosa City Utilities Dept	Santa Rosa City CS	1SSO11491	Category 1 Spill	2024-11-23 11:10	770	0	770	Gravity Mainline	Gravity Mainline,Manhole
<a href="#">898024</a>	1	Santa Rosa City Utilities Dept	Santa Rosa City CS	1SSO11491	Category 1 Spill	2024-12-13 23:00	4,085	0	4,085	Gravity Mainline,Other (specify below)	Gravity Mainline,Lateral Clean Out (Private),Manhole
<a href="#">899437</a>	1	Santa Rosa City Utilities Dept	Santa Rosa City CS	1SSO11491	Category 1 Spill	2025-02-02 23:42	825	39	786	Gravity Mainline,Other (specify below)	Gravity Mainline,Manhole

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