

Los Angeles Regional Water Quality Control Board

July 23, 2015

Mr. Louis Atwell
Director of Public Works
City of Inglewood
1 West Manchester Boulevard Suite 300
Inglewood, CA 90312

VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED
Claim No. 7014 2870 0001 4537 9945

NOTICE OF VIOLATION – CITY OF INGLEWOOD COLLECTION SYSTEM – WDID 4SSO10395, ORDER NOS. 2006-0003-DWQ AND 2013-0058-EXEC

Dear Mr. Atwell:

The City of Inglewood (Enrollee) operates a sanitary sewer collection system (hereafter, collection system), regulated under waste discharge requirements contained in State Water Resources Control Board Order No. 2006-0003-DWQ Statewide General Waste Discharge Requirements for Sanitary Sewer Systems (SSS WDR), adopted by the State Water Resources Control Board on May 2, 2006.

The SSS WDR contains waste discharge requirements and a monitoring and reporting program for the operation of the Enrollee's collection system referenced above. Wastewater conveyed by the Enrollee's collection system is susceptible of containing high levels of suspended solids, pathogenic organisms, toxic pollutants, nutrients, oxygen-demanding organic compounds, oil and grease, and other pollutants which can degrade water quality and impact beneficial uses of water, and which are defined as wastes under the Porter-Cologne Water Quality Control Act (CWC § 13000 et seq.).

The SSS WDR prohibits any Sanitary Sewer Overflow (SSO) that results in a discharge of untreated or partially treated wastewater to waters of the United States. Furthermore, the Enrollee is required to report all SSOs to the statewide California Integrated Water Quality System (CIWQS) SSO Online Database¹. As of June 22, 2015, the Enrollee has reported twenty-two (22) Category 1 SSOs totaling 29,560 gallons illegally discharged to waters of the United States.

On December 18, 2014, State Water Resources Control Board and Regional Water Quality Control Board (State and Regional Water Board) staff conducted an inspection of the Enrollee's collection system to evaluate compliance with the SSS WDR. The inspection findings (see Exhibit 1) and the inspection report (see Exhibit 2) are both attached for your reference.

¹ Available at:

https://ciwqs.waterboards.ca.gov/ciwqs/readOnly/PublicReportSSOServlet?reportAction=criteria&reportId=sso_main

You are hereby notified that the Enrollee is in violation of the Sanitary Sewer Collection System Order No. 2006-0003-DWQ and has violated California Water Code (CWC) §§ 13350 and 13383:

You are required to immediately:

1. Ensure full implementation of all required reporting requirements contained in the Amended Monitoring and Reporting Program;
2. Immediately implement corrective and preventative actions to bring the Enrollee's collection system into compliance with the Sanitary Sewer Collection System Order No. 2006-0003-DWQ;
3. Submit by **August 24, 2015**, a report to the Regional Board detailing the corrective actions being taken to bring the Enrollee's collection system into compliance with the Sanitary Sewer Collection System Order No. 2006-0003-DWQ. This report should address the violations and the Areas of Concern listed in Exhibit 1 – Inspection Findings attached to this notice. The report must be submitted as a pdf via email or disk to Mr. Andrew Choi, 320 W. 4th Street, Suite 200, Los Angeles, CA 90013-2343, achoi@waterboards.ca.gov, (213) 576-6791.

Pursuant to CWC § 13350, subdivision (e), the Enrollee is subject to penalties of up to \$5,000 for each day in which a violation occurs or \$10 for each gallon of waste discharged, but not both. Pursuant to CWC § 13385, the Enrollee is subject to penalties of up to \$10,000 for each day in which a violation occurs plus \$10 multiplied by the number of gallons by which the volume discharged but not cleaned up exceeds 1,000 gallons. The Regional Board may refer this matter to the Attorney General for judicial enforcement. The Regional Board reserves its right to take any enforcement actions authorized by law.

If you have any questions regarding this matter, please call Mr. Russ Colby at (213) 620-6373 or Mr. Andrew Choi at (213) 576-6791.

Sincerely,



Paula Rasmussen
Assistant Executive Officer

Enclosures:

- Exhibit 1 – Inspection Findings
- Exhibit 2 – Sanitary Sewer Collection System Inspection Report

cc: [via e-mail]

Jim Fischer, State Water Resources Control Board, Office of Enforcement
Bryan Elder, State Water Resources Control Board, Office of Enforcement
Julia Hooten, State Water Resources Control Board, Office of Enforcement

Exhibit 1

Inspection Findings

TABLE 1: VIOLATIONS

VIOLATION	REQUIREMENT	DESCRIPTION
<p>1) <i>Based on review of CIWQS data reported by the City between 1/2/07 and 6/22/2015, the City certified that 29,560 gallons of untreated sewage reached surface waters. (Please see Table 3 below)</i></p>	<p>Prohibition C.1 of SSS WDRs</p>	<p>All of the Sanitary Sewer Overflows (SSOs) that discharged to waters of the United States are in violation of Prohibition C.1 of the SSS WDRs.</p>
<p>2) <i>The City is not implementing its Sewer System Management Plan (SSMP) Rehabilitation and Replacement Program.</i></p>	<p>Provisions D.11 of SSS WDRs</p>	<p>The City is not implementing its rehabilitation and replacement plan covering its entire sewer system. Inspectors learned that the most recent City Sewer Master Plan completed in 2007 indicates that condition assessment using Closed-Circuit Television (CCTV) has only been conducted on 36 percent of the sewer system for identifying, programming and funding necessary sewer rehabilitation and replacement projects.</p> <p>In addition, Inspectors learned the City has only focused its efforts on major point repairs and lining projects and is significantly behind on addressing nearly 24 million dollars in "Condition Improvements" identified in its Sewer Master Plan (see Inspection Report, ATTACHMENT 3 – "City of Inglewood Sewer Master Plan").</p>
<p>3) <i>The City failed to implement its SSMP System Management Plan (SSMP) Capacity Program.</i></p>	<p>Provision D.11 of SSS WDRs</p>	<p>The City's May 2, 2009 SSMP on page 8 states that "The Sewer Master Plan report includes design and construction recommendations, as well as construction cost estimates, for short-term and long-term repair, rehabilitation, and replacement of sewer mains within the sewer collection system." Inspectors learned that the City has not yet started addressing nearly 16 million dollars in "Capacity Improvements" identified in its Sewer Master Plan (see Inspection Report, ATTACHMENT 3 – "City of Inglewood Sewer Master Plan").</p>
<p>4) <i>The City's Fats, Oils and Grease (FOG) Control program is deficient.</i></p>	<p>Provisions D.8, D.11, D.13(iii)(a), and D.13(vii) (f) and (g) of SSS WDRs</p>	<p>The inspection revealed heavy FOG accumulation in City sewer lines and that no enforcement action was taken against the food service establishment that inspectors visited on December 18, 2014. The City also confirmed during the inspection that they are not currently implementing a targeted public outreach program to promote proper disposal of FOG.</p>
<p>5) <i>The City's existing operations and maintenance program for its sewer siphon location is deficient.</i></p>	<p>Provision D.11 of SSS WDRs</p>	<p>The inspection revealed that the City does not have a regular maintenance program to address its sewer siphon location. The inspection also revealed significant accumulation of fats, oils, and grease (FOG) at this location.</p>

TABLE 1: VIOLATIONS

VIOLATION	REQUIREMENT	DESCRIPTION
6) <i>The City failed to conduct SSMP Program Audits.</i>	D.13(x) of SSS WDRs	Inspectors learned that the City failed to conduct its SSMP Program Audits. The City must complete an SSMP Program Audit every two years to evaluate the effectiveness of its SSMP including compliance with required SSMP elements. The Program Audit must also identify areas for improvement and steps and to correct any deficiencies.
7) <i>The City failed to provide a MRP link or upload the SSMP to CIWQS.</i>	Amended MRP Order No. 2013-0058-EXEC, section 8 iv.	The City must upload its SSMP to CIWQS or provide a link to where this document is publicly available in the SSMP screens in the SSO Online Database.
8) <i>The City failed to meet the 2-hour notification requirements for 6 individual Category 1 SSOs.</i>	Amended MRP Order Nos. 2008-0002-EXEC and 2013-0058-EXEC	The City failed to timely notify all three required agencies within 2 hours of becoming aware of SSO IDs 734652, 740678, 775936, 792032, and 798364 [State Office of Emergency Services (OES), the local health officer, and the Regional Water Board]. In addition, the City failed to timely notify OES within 2 hours of becoming aware of SSO ID 801810.
9) <i>The City failed to meet the 15-day certification requirement for one individual Category 1 SSO.</i>	Amended MRP Order No. 2013-0058-EXEC	The City failed to timely certify SSO ID 808679.

TABLE 2: AREAS OF CONCERN¹

AREA OF CONCERN	REQUIREMENT	DESCRIPTION
1) <i>City Root Control program.</i>	Provisions D.8, D.11 of SSS WDRs	The City stated during the inspection that they used to provide root control chemicals to customers within its service area but has since cancelled this program due to funding constraints. To reduce/eliminate future SSOs caused by roots, the City should incorporate available proactive measures, technologies, and industry standard practices ² to further improve its existing root control program.
2) <i>Records of sewer maintenance.</i>	Amended MRP, Order No. 2013-0058-EXEC	The inspection revealed that some periodic maintenance activities were not being logged into the City's maintenance management system. The City should ensure that all maintenance activities including those to address remedial actions at "hot spots" are recorded.
3) <i>City collections staff training materials and standard operating procedures (SOPs).</i>	Provision D.8 and D.13(iv)(d) of SSS WDRs	Inspectors learned that the City does not have written training materials and standard operating procedures (SOPs) for collection staff covering major sewer equipment/operations. To ensure ongoing compliance with the SSS WDRs, the City should further improve its existing training program to ensure all collections staff and contractors (where used) are adequately trained.

¹ An Area of Concern includes an issue identified during in the audit that could lead to future violation(s) if not properly addressed.

² See "[Best Management Practices for Sanitary Sewer Overflow\(SSO\) Reduction Strategies](#)", [topics on root control](#)

TABLE 3: LIST OF SSOs THAT REACHED SURFACE WATER

EVENT ID	SSO Category	SSO Volume	Volume of SSO Recovered	Volume of SSO Reached Surface Water	SSO Failure Point
724518	Category 3	140	140	0	Main
724520	Category 1	480	400	80	Main
725079	Category 1	582	182	400	Main
726365	Category 3	108	0	0	Main
732202	Category 3	260	260	0	Main
734652	Category 1	5000	1000	4,000	Main
738593	Category 1	360	335	25	Main
740678	Category 1	3100	250	2,850	Main
746385	Category 3	240	240	0	Main
754011	Category 1	540	500	40	Main
754100	Category 1	688	638	50	Main
755979	Category 3	40	40	0	Main
762329	Category 1	260	200	60	Main
762344	Category 1	585	146	439	Main
762350	Category 1	1080	270	810	Main
766797	Category 3	850	850	0	Main
775936	Category 1	1782	1012	770	Main
787984	Category 1	819	100	719	Main
789712	Category 3	800	800	0	Main
791049	Category 2	1830	1830	0	Main
792032	Category 1	6525	1600	4,925	Main
793947	Category 1	550	50	500	Main
797351	Category 1	418	350	68	Main

TABLE 3: LIST OF SSOs THAT REACHED SURFACE WATER

EVENT ID	SSO Category	SSO Volume	Volume of SSO Recovered	Volume of SSO Reached Surface Water	SSO Failure Point
798364	Category 1	2500	100	2,400	Main
800111	Category 1	820	100	720	Main
801810	Category 1	11221	1400	9,821	Private lower lateral on property.
801828	Category 1	192	24	168	Upper lateral from private entity.
803771	Category 1	242	42	200	Gravity Mainline
803865	Category 1	205	100	105	Lower lateral (private)
808679	Category 1	410	0	410	Gravity Mainline
812283	Category 2	1000	1000	0	Gravity Mainline
815301	Category 3	747	10	0	Gravity Mainline

Total Volume of SSO reaching surface water = **29,560**

Exhibit 2

Sanitary Sewer Collection System Inspection Report

Inspected By: Jim Fischer, WRCE Bryan Elder, WRCE Julia Hooten, ES Andrew Choi, WRCE		Agency: SWRCB-Office of Enforcement SWRCB-Office of Enforcement SWRCB-Office of Enforcement Los Angeles Regional Water Board		Inspection Date 12/18/2014 [CIWQS Inspection ID #19899933]	
Name and Location of Facility Inspected			Entry Date/Time	Exit Time	
City of Inglewood [CIWQS Place ID 632003] 1 West Manchester Blvd Inglewood, CA 90301			12/18/2014 (0910)	12/18/14 (1620)	
WDID NO.	Order No.	Population	Permit Effective Date	Permit Exp. Date	
4SSO10395	2006-0003-DWQ	109,712	1/2/2007	N/A	
City Representatives Names & Titles: Raieshwar Rai, Principle Engineer Boytrese Osias, Senior Engineer Jose Ramirez, Stormwater Runoff Investigator Ray Yeghyayan, Engineer William Payne, Collections Maintenance Maurico Paradas, Collections Maintenance Roosevelt Robinson, Collections Maintenance Elsa Moreno, GIS Technician Lauren Animoto, Senior Administrative Analyst			Contact Information: Phone No: (310) 412-5333		
Inspection Consent Approved By:			Date	Time	
Bermeshwar Rai, Director of Water Quality			12/18/2014	0938	
Sewage Collection System Description					
One sanitary sewer collection system with 145 miles of gravity sewers (no pump stations or force main sewers). Approximately 96 percent of the sewer system was constructed prior to 1980.					
On December 18, 2014, the above State Water Resources Control Board inspection team staff performed a scheduled inspection of the Inglewood City Sanitary Sewer Collection System in Inglewood, California. The weather during the inspection was cloudy with temperatures in the 60s. The purpose of the inspection was to assist the Los Angeles Regional Water Quality Control Board in conducting a sewer system audit to evaluate the City's compliance with Sanitary Sewer System Waste Discharge Requirements (SSS WDRs), Order No. 2006-0003-DWQ. This includes a pre-inspection data audit, conducting a physical onsite inspection of the facility, and conducting post-inspection review of all data submitted by the City (for more information, see ATTACHMENT 1 — "Pre-Inspection Questionnaire completed by Inglewood City").					
<u>PART 1: PRE-INSPECTION CONFERENCE</u>					
We arrived at City Hall at approximately 0900 hrs to start the Pre-Inspection Conference (see Photos 1-2 below). Note: Some "time stamps" on inspection photos are incorrect due to a wrong camera setting. In addition, some photos are presented out of the order taken to consolidate inspection areas reviewed.					



Photo 1: Inspection team members entering City Hall



Photo 2: Pre-Inspection Conference at City Hall

We began with introductions of inspection team members and City's staff also introduced themselves. A sign-in sheet was circulated to document all members present (see ATTACHMENT 2 — "Inglewood City Inspection Sign-In Sheet for December 18, 2014"). We then discussed reasons for the inspection and some basic information about state and regional board responsibilities. The City was prepared with numerous materials ready for our review including a completed "Pre-Inspection Questionnaire". The main topics and information discussed are summarized below. Rai provided consent for us to conduct the inspection and take photographs at approximately 0938 hrs.

1. **INSPECTION AGENDA:** We provided an overview of the inspection content for morning and afternoon portions. We started with questions about some answers in the City's completed Pre-Inspection Questionnaire, Sewer System Management Plan (SSMP), Capital Improvement Plan (CIP), and sewer maps. Rai was the main contact responding to most of our questions initially and told us that he had been with the City for about 5 ½ years to date.
2. **SSMP INTERNAL AUDITS [SSS WDRs, Provision D.13(x)]:** Animoto stated that they didn't complete the SSMP internal audit, but said they are "working on it now" and we mentioned that this is a violation of the SSS WDRs, subsection D.13(x). Animoto also stated that they did an update to their SSMP which includes conducting some internal meetings within their water division to discuss sewer system deficiencies to be addressed.
3. **SSO RECORDS AND DOCUMENTATION [Amended MRP, Order 2014-0058-EXEC]:** Ramirez described the process of how their sewer-related calls and complaints are routed and tracked. Ramirez told us that "after hours" calls that come in are all handled by the local police department. Regarding follow-up tasks for recording and documenting Sanitary Sewer Overflows (SSO), Ramirez stated that after they become involved in these events, they do their own flow calculations and describe what they did in records including how they applied best management practices (BMPs) for field activities. Ramirez also stated that the City routinely talks to the residences to obtain evidence such as when they first saw the spills. We asked the City if they conduct any type of call screening such as asking callers questions about spill details such as when they first noticed the spill or if the spill may be discharging to drains or surface waters. Ramirez stated that the City does not use any call screening and he said that about 90 to 95 percent of the time, citizens reporting spills "want to remain anonymous". Ramirez also said that as part of their standard operating procedures, collections staff "walk the neighborhoods" after the spills to try and obtain more details and conduct research to figure out what exactly happened. We next asked the City to describe how their field crews and administrative staff work together to document field operations such as spill response and cleaning activities. Collections staff told us that they schedule cleaning based on their "hot spot" lists which include areas on an "as needed" basis depending on locations. We also asked the collection staff to describe the process about how they communicate with management in discussing problem areas, locations, and results of cleaning

operations. Ramirez provided a basic summary about how these linkages are set-up and how the information is documented.

4. **ELECTRONIC COLLECTION SYSTEM MONITORING (SSS WDRs, Provision D.8):** Rai stated that the City has purchased a number of sewer “Smart Covers” that provide real-time electronic level monitoring in the sewer system to alert them remotely of problems, and in some cases prevent SSOs. Animoto stated that the City’s current budget includes a line item for purchasing additional “Smart Covers” to be placed in additional problem areas throughout the sewer system.
5. **SEWER VISUAL INSPECTION PROGRAM [SSS WDRs, Provision D.13(iv)(c)]:** We asked the City to tell us the approximate percentage of the entire sewer system that has been evaluated to date and Osias stated he thinks about 64% has been inspected to date. We then asked the City to explain their proposed schedule for how long it would be until they have complete visual CCTV data for the entire sewer system. We pointed out to the City that we noticed that it has been nearly 10 years since they have conducted any major CCTV inspections.
6. **SEWER SYSTEM CAPACITY [SSS WDRs, Provision D.13(viii)]:** Regarding funding and projects to address capacity, Osias stated that in section 7 of their current sewer masterplan, they will need approximately \$16 million to \$24 million including new CCTV work to be completed to address hydraulic capacity. Osias provided a copy of the list of capacity projects identified in their sewer masterplan (see ATTACHMENT 3 – Inglewood City Identified Capacity Projects). We next asked the City to tell us about any areas where they are having capacity issues including any surcharging. Paradas stated that he knows of some areas that he could show during the field inspections where “a lot of water meet” in sewer lines.
7. **SEWER COMPLAINT RECORDS [Amended MRP, Order 2014-0058-EXEC]:** Collections staff told us that field crews use their current computerized maintenance and management system (CMMS) software called “iWORKS” to generate work orders and keep track of system complaint records including periodic maintenance locations. Rai told us that data within “iWORKS” is publicly accessible which they started back in 2012. We asked about training and Standard Operating Procedures (SOPs) for staff using iWORKS. Rai said that field crews are all trained by City programmers using this system. Ramirez also said the City has a written SOP for iWORKS. Ramirez added that prior to iWORKS, the City used another computerized data system which was also accessible by the general public. Ramirez said that the City has received lots of very positive feedback from the general public about data access to this system. Ramirez said that these data systems have allowed them to record complaints, phone calls, visits, and field inspections.
8. **SSO RECORDS AND DOCUMENTATION [Amended MRP, Order 2014-0058-EXEC]:** We next asked the City about how after-hours calls are handled. Collections staff told us that field crews first start new paper work orders in the field and also said that they wish to move to having portable electronic devices for these tasks to assist with improving record keeping tasks. Moreno stated they are currently trying to pursue into getting all field crews electronic to log these tasks which would cover both storm water and sewer system records. Both Moreno and Osias said that the current City Director is very comfortable in supporting them with this concept to improve their current paper work system for all field staff.
9. **FATS, OILS, GREASE (FOG) CONTROL [SSS WDRs, Provision D.13(vii)]:** We asked the City to describe their FOG root control programs since many of the City’s SSOs are caused by FOG. Ramirez stated that he thinks about 60 percent of the FOG problems in the City are mostly coming from restaurants with the remaining 40% of the FOG problem coming from residential customers. Ramirez also said that the City does some FOG outreach at local festivals but do not do any direct FOG outreach materials to customers. Animoto said that for commercial FOG, the City started in 2010 to get everyone permitted and passed a local FOG ordinance to help give restaurants an extra year to comply with the new regulation. Animoto told us that the City issued several Notices of Violation (NOV). Ramirez said that their commercial inspection process includes checking to see if a business license is active and valid and then do a check of grease interceptors using a PVC measurement tool they designed for the crews. Ramirez said that they typically have inspectors check sample boxes at commercial sites and if they are clogged with buildup of FOG, they will send crews out to CCTV sewer lines in the vicinity and then bill commercial owners for any work performed by the City. Ramirez stated the they typically do all inspections announced but said they do not give commercial owners any more than about 24 hours of advanced notice before they conduct their FOG inspections. Ramirez said

that the City uses two existing staff to conduct these inspections and told us that the City plans to backfill 2 vacancies within the next 6 months to have them do future inspections to help them meet their goals for this program.

10. **ROOT CONTROL PROGRAM (SSS WDRs, Provision D.8):** We asked the City to describe their root control program since many of the City's SSOs are caused by roots. Ramirez said that in past, the City used to give-out free root chemicals called "ROOTX" but the program ended in 2012 due to funding issues. Osias stated this program received very positive responses from residences and Rai also said that "sometime in the future" the City may start another program like this one which assists them with interfacing with residences to deal with their sewer lateral policy. We asked if the City has any repeat problem locations for FOG or roots and Ramirez said that the City does have some repeat problems but they are addressing these on their "hot spot" lists. Osias added that most of their root problems reported are coming from privately-owned sewer laterals and the only way to help residents is to give them chemicals for root treatment. Ramirez stated that they do not CCTV any of the lateral problems but he said that sometimes they will document and CCTV some problem spots at lateral/mainline sewer locations and then provide homeowners with CCTV photos to show the problems.
11. **SSO PROBLEM LOCATIONS (SSS WDRs, Provision D.8):** Moreno stated they are in the process of linking some of the SSO sites with past problem areas to better define their targeted "hot spot" program.
12. **CAPITAL IMPROVEMENT PROJECTS [SSS WDRs, Provision D.13(iv)(c)]:** We asked to see what projects included in their masterplan have been completed so far since they have so many bad areas identified in the collection system (see ATTACHMENT 4 – "List of Inglewood City Identified Capital Improvement Projects"). Osias told us that approximately 8,000 linear feet of sewer lines have been repaired and he said this included over 200 individual point repairs and sewer lining projects. Osias also stated that they have a long list with about \$24M targeted to address all of these issues over the next 20 years (see ATTACHMENT 4 – "List of Inglewood City CIP Projects". Osias also stated to us that "this is the best they can do for now due to budget issues" and he acknowledged that the City needs significant additional funds to address problem areas already identified. Rai added that they have not done many capacity projects to date but said they will be moving soon on some improvements to address capacity.
13. **SEWER SIPHON AND MAINTENANCE (SSS WDRs, Provision D.8):** We asked the City if they have a maintenance program for the one sewer siphon area and Osias stated that they "are only monitoring the location" and conduct physical visual inspections of the area by "walking the line". Osias stated that they have never conducted any CCTV inspections of this area to date. Ramirez and collections staff told us that they were never aware that they had a sewer siphon within the service area.

We took note of a project listed in the City's current CIP list recommending a major "upsized" of sewer lines, going from an existing 8 inch sewer to a 21 inch sewer. We asked Osias about this area and he told us that this includes sewer lines on Yukon Avenue where these projects are to be implemented between 108th Ave and Imperial Highway.

PART 2: VISUAL INSPECTION ACTIVITIES

1. **YUKON AVENUE AT 108TH AVENUE:** We arrived at 1315 at this location to observe the existing flow conditions within this sewer line and check for any evidence of surcharging in the manhole structure. This location is where the City's sewers discharge into trunk line sewers owned and operated by the LACSD (see photos 3-6 below). We noted that the manhole ring at this location was corroded and also observed that the City's sewer line at this location was running at less than ½ full. We also noted that the LACSD's sewer trunk line was flowing at over ½ full at this location.

The following concerns were observed at this location:

1. Evidence of corrosion of manhole base ring (see Photo 5 below)

2. Flows greater than ½ full during off-peak, dry weather in the LACSD trunk line sewer.



Photo 3: Inspection site (view 1)



Photo 4: Inspection site (view 2)



Photo 5: Manhole and sewer line inspection; note manhole ring corrosion



Photo 6: Manhole and sewer line inspection; note LACSD trunk line on right with high flows

2. **107TH AVENUE AT DOTY AVENUE:** This location is where the City's sewers discharge into trunk line sewers owned and operated by the LACSD. We noted that the manhole ring at this location was corroded and that the City's sewer line at this location was running at less than ½ full. We observed that flows within the LACSD's sewer trunk line were flowing at over ½ full.

The following concerns were observed at this location:

1. Evidence of corrosion of manhole base ring (see Photo 8 below)
2. Flows greater than ½ full during dry weather in the LACSD trunk line sewer (see Photo 9 below)

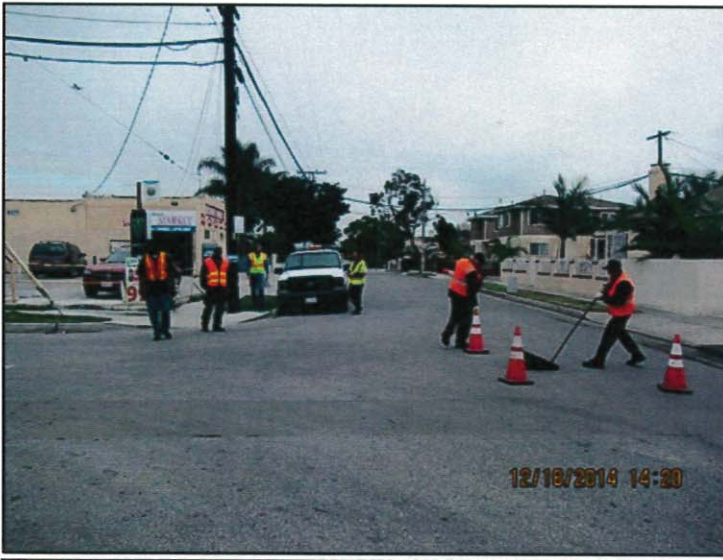


Photo 7: Inspection site (view 1)



Photo 8: Manhole and sewer line inspection; note manhole ring corrosion



Photo 9: Manhole inspection; note LACSD trunk line on right with high flows



Photo 10: Sewer map review with Ramirez

3. **YUKON AVENUE AT 109th AVENUE:** This location is where the City's sewers discharge into trunk line sewers owned and operated by the LACSD. We noted that the manhole ring at this location was corroded and noted that the City's sewer line at this location was running at less than ½ full. We observed flows within the LACSD's sewer trunk line were flowing at over ½ full. In reviewing the sewer maps at this location, we noted that the City may actually own the sewer lines labeled on maps as sewer trunk lines owned and operated by LACSD.

The following concerns were observed at this location:

1. Evidence of corrosion of manhole base ring (see Photo 13 below)
2. Flows greater than ½ full during dry weather in the LACSD trunk line sewer (see Photo 14 below)
3. Possible error in identification of City-owned sewer lines on maps for this location.

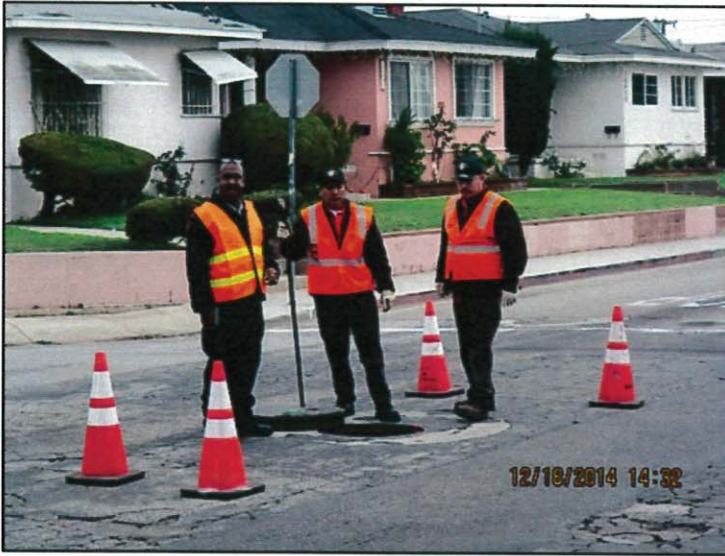


Photo 11: Inspection site (view 1)



Photo 12: Inspection site (view 2)



Photo 13: Manhole and sewer line inspection; note manhole ring corrosion



Photo 14: Manhole and sewer line inspection and trunk line on right with high flows

4. **MANCHESTER AT PRARIE: (Northwest Corner):** We observed heavy buildup of FOG. Ramirez stated that the City uses an emulsifying agent ("Green Gobbler") at this location to help keep FOG reduced because of the Sizzler restaurant that feeds this mainline sewer. Paradas stated to us that this manhole was cleaned approximately 6 months ago and they "check it as needed". He also stated periodic maintenance at location is not on a periodic maintenance schedule in the City's system and stated that "it should be."

The following concerns were observed at this location:

1. Heavy buildup of FOG on manhole base and in sewer line at this location (see photos 16-18 below)
2. Lack of periodic maintenance for this location being entered into City's CMMS.



Photo 15: Inspection site (view 1)



Photo 16: Manhole inspection (view 1): note heavy FOG buildup on manhole base and in sewer line



Photo 17: Manhole inspection (view 2): note heavy FOG buildup on manhole base and in sewer line



Photo 18: Manhole inspection (view 3): note heavy FOG buildup on manhole base and in sewer line

5. **W MANCHESTER BLVD AT S PRARIE AVE:** We observed heavy buildup of FOG. Paradas stated to us that this manhole is not on a 6 month cleaning cycle and said that it should be added to their schedule. Robinson stated to us when we left the site that Sizzler is currently being exempted from requiring any ongoing periodic inspections of this area until which time they install a grease interceptor. Robinson said he would follow-up and talk to Sizzler and require them to clean this area immediately due to the buildup of FOG. Robinson also said that they would consider taking away Sizzler's current inspection exemption.

The following concerns were observed at this location:

1. Evidence of heavy buildup of FOG on manhole base and in sewer line at this location (see Photo 20 below)
2. Location not on periodic cleaning schedule in City CMMS.
3. Lack of enforcement against FOG source.



Photo 19: Inspection site (view 1)



Photo 20: Manhole inspection; note heavy buildup on manhole base and in sewer line

4. **MARKET STREET AT HYDE STREET:** We observed the sewer lines flowing at approximately $\frac{1}{2}$ full at this location.

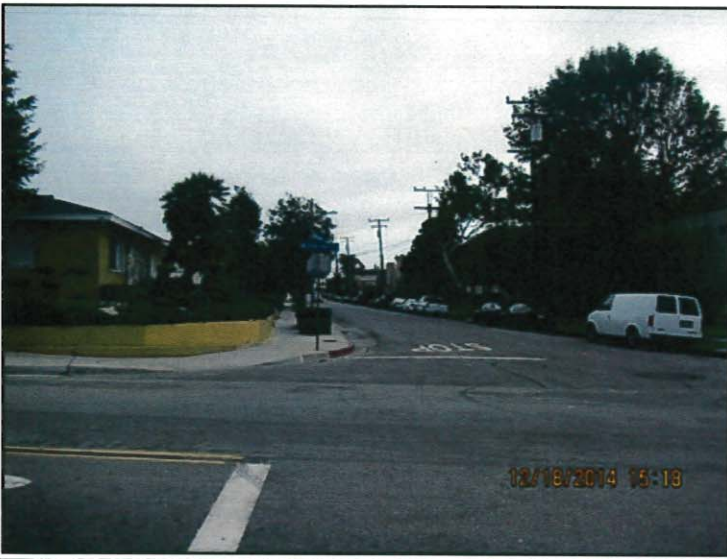


Photo 21: inspection site (view 1)



Photo 22: Manhole inspection (view 2)



Photo 23: Manhole inspection (view 1); note heavy buildup on manhole base and in sewer line

Photo 24: Manhole inspection (view 2); note heavy buildup on manhole base and in sewer line

5. **512 ELLIS STREET:** We asked the City if they have any standard operating procedures (SOPs) for removing and inspecting the “Smart Cover” manhole and Ramirez stated that the City does not have any written SOPs for these tasks but only use “verbal” procedures for staff. Ramirez said that they rely on the “Smart Cover” company for performing some periodic ongoing maintenance for these units. Approximately 3 minutes after the manhole cover was removed, an “intrusion alarm” text was received by Ramirez on his cell phone and he showed us the text (see Photo 28 below). Ramirez told us that the alarm also requires an acknowledgement that the alarm was received or it will keep calling. Ramirez also said that they have had this unit installed at this location about 5 years and told us that they have had about 20 to 30 alarms over the course of this time for surcharging inside the manhole. Ramirez said that if they get any high level alarms at this location, they first send crews to check the next downstream manhole from this location for surcharging to prevent an SSO. Ramirez said that their procedure after checking the downstream manhole is to then clean this line using a hydro jet since he said most of the time the problems are caused by root build-ups. Ramirez said that they do periodic maintenance on this line “as needed” and told us that this location is also listed in their CMMS system as a “hot spot” area. Both Ramirez and Paradas both stated that they were surprised to see how low the flow levels were inside this manhole.

The following concern was observed at this location:

1. Lack of procedures for inspecting and checking this asset.



Photo 25: "Smart Cover" inspection site (view 1)



Photo 26: "Smart Cover" inspection site (view 2)



Photo 27: "Smart Cover" inspection site (view 3)



Photo 28: Cell phone text from "Smart Cover" system

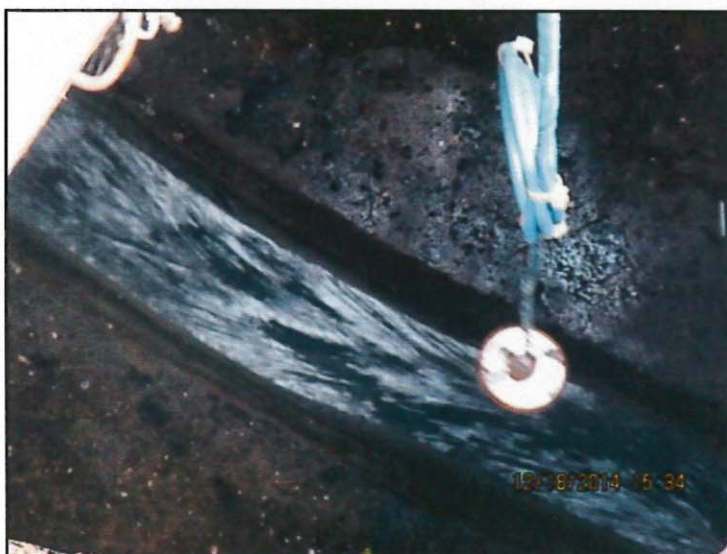


Photo 29: "Smart Cover" ultrasonic sensor (view 1)

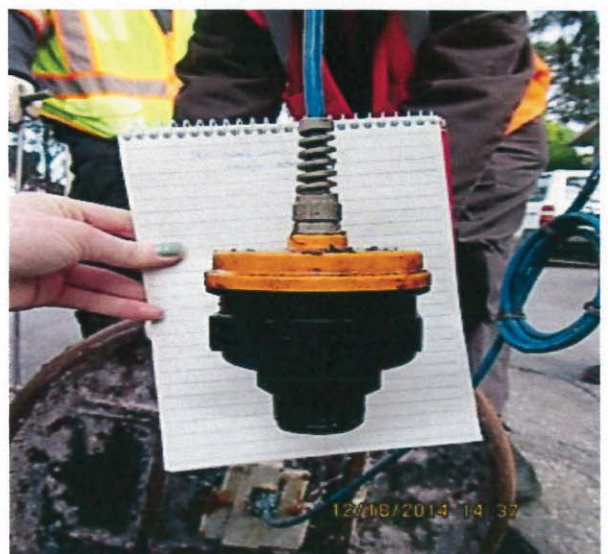


Photo 30: "Smart Cover" ultrasonic sensor (view 2)

2. **IMPERIAL HIGHWAY AND DOTY STREET (sewer siphon location):** We immediately observed a significant buildup of solid materials. Paradas stated that they put enzymes in the upstream manhole from this location about every 3 months and then check and clean this area “as needed”. We asked Paradas if this area is flagged in the City’s CMMS system as a “hot spot” he told us that this area is not on a periodic maintenance schedule in the CMMS. Paradas also stated that this area had been cleaned about 6 months ago and told us that the City does not have any SOPs for cleaning these areas.

The following concerns were observed at this location:

1. Evidence of heavy buildup of FOG on manhole base and in sewer line at this location (see Photos 33-34 below).
2. Location not on active periodic cleaning schedule in CMMS.
3. Lack of procedures for cleaning these lines.



Photo 31: Sewer siphon inspection site (view 1)

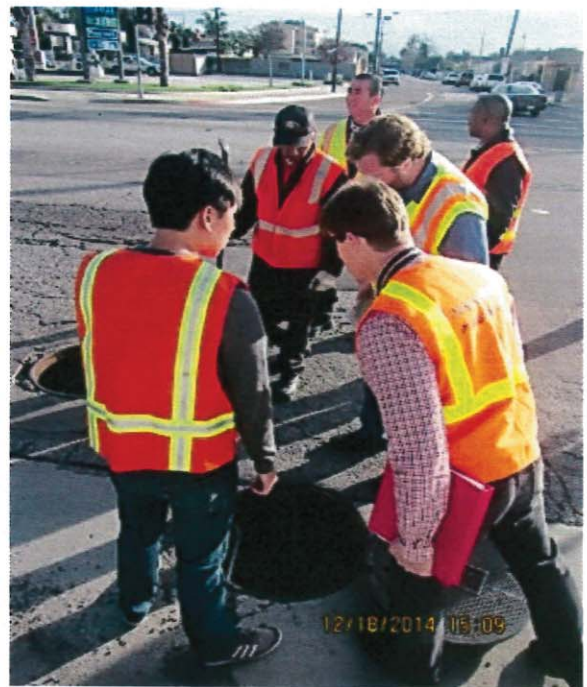


Photo 32: Sewer siphon inspection site (view 2)



Photo 33: Siphon inspection (view 1); note heavy FOG mat on surface below

Photo 34: Siphon inspection (view 2); note heavy FOG mat on surface below

PART 3: POST-INSPECTION CONFERENCE

1. We reiterated the inspection purpose and thanked participants for their efforts in preparing and participating in the inspection tasks.
2. We stated that we would be conducting further review of documentation submitted by the City including their SSMP, answers provided to our "Pre-Inspection Questionnaire" and other materials before completing our inspection report and audit findings.
3. We told the City that that we would be communicating with the Los Angeles Regional Water Board (Choi) following the inspection and reminded them that they are the City's primary point of contact for anything moving forward.
4. The City will contact Choi to have him follow-up and go with them to conduct a FOG inspection with the City the next time they are inspecting which should be in early January 2015.
5. We mentioned our concerns regarding an apparent lack of communication about problem areas between engineering and operations departments. We provided the example that we experienced earlier during field inspections related to operations staff not agreeing on capacity problem on Yukon Avenue and having told them about operations concerns about being confused the way the current CIP is written-up for this location.
6. We told the City about our concerns regarding mapping that may not be properly represented in the actual field and told them that we would like further clarification about the CIP projects to be undertaken, including clarification of city and LACSD-owned sewer assets and markings in these areas.
7. We told the City that we had difficulty in understanding where their capacity issues exists and told them that even the field crews did not understand these problem locations including CIP projects programmed to address these issues.

8. We mentioned our concern that the collection staff were unaware of the sewer siphon area. We also told the City about our concerns that these areas were not being maintained including lack of any written procedures for cleaning these areas.
9. We stated that the City lacks an adequate training program and SOPs for sewers including having BMP knowledge for crews for FOG and Root control practices.
10. We offered to send the City some up-to-date sewer program BMPs to use for reference.

ATTACHMENTS

ATTACHMENT 1 — Pre-Inspection Questionnaire completed by Inglewood City

ATTACHMENT 2 — Inglewood Inspection Sign-In Sheet for 12/18/2014

ATTACHMENT 3 – List of Inglewood City Identified Sewer Capacity and Condition Improvement Projects

ATTACHMENT 4 – Inglewood City Collection System Operational Report

ATTACHMENT 1

“Pre-Inspection Questionnaire” completed by Inglewood City



SEWER COLLECTION SYSTEM
PRE-INSPECTION QUESTIONNAIRE
Version 1.7

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PART 1 — DESCRIPTION

This Sewer Collection System Pre-Inspection Questionnaire (Questionnaire) includes questions specific to the requirements in the Sanitary Sewer System Waste Discharge Requirements Water Quality Order No. 2006-0003-DWQ (hereafter SSSWDR), and its accompanying Amended Monitoring Plan Order No. 2008-0002-EXEC (hereafter Amended MRP).

All of the questions in this Questionnaire must be answered by the Enrollee to demonstrate how the agency is complying with the SSSWDR and the Amended MRP. All responses provided in the Questionnaire along with the documentation required to be submitted by each Enrollee (see Part 3, Section 1) will be collected by the Water at the time of the inspection.

PART 2 — INSTRUCTIONS

1. Complete all questions in the Questionnaire.
2. Save an electronic copy of the completed Pre-Inspection Questionnaire (in MS Word), and the other documentation required for your collection system (see Part 3, Section 1). Print the last page of this Questionnaire and sign it in ink.

PART 3 — REQUIRED INFORMATION

1 DOCUMENTATION

Please have the following documentation available during the inspection:

- 1.1 Sewer System Management Plan [(SSMP) [Sanitary Sewer System General Waste Discharge Requirements (SSSWDR), Sect. D.13] and any documents referenced within the SSMP. Also include documentation showing approval of the SSMP by your agency’s local governing board (e.g., Board Resolution or other documentation).
- 1.2 SSMP Program Audit¹ [SSSWDR, Sect. D.13(x)], if not contained within your agency’s SSMP
- 1.3 Sewer System Area Map [SSSWDR, Sect. D.13(iv)], if not contained within your agency’s SSMP
- 1.4 Local Sewer Use Ordinance [SSSWDR, Sects. D.13(iii) and D.13(vi)], if not contained within your agency’s SSMP
YES – E-MAILED LIST
- 1.5 Evidence of Agency’s SSO Field Response Documentation [SSSWDR, Amended MRP, B.5], if not contained within your agency’s SSMP YES
- 1.6 Rehabilitation and Replacement Plan [SSSWDR, Sect. D.13(iv)(c)], if not contained within your agency’s SSMP
E-MAILED LIST/LOG – WATER MASTER PLAN / CIP SCHEDULE
- 1.7 Capital Improvement Plan (CIP) Schedule for System Evaluation and Capacity Assurance Plan (SECAP) [SSSWDR, Sect. D.13(viii)], if not contained within your agency’s SSMP - WATER MASTER PLAN / CIP SCHEDULE

2 Basic Information

¹To satisfy SSSWDR, Sect. D.13(x), the SSMP Audit must occur at least every two years following the original approval date of the agency’s SSMP by the local governing board. The SSMP Audit must measure the effectiveness and compliance of an Enrollee’s SSMP.

- 2.1 Collection System Waste Discharge ID number (WDID) and Collection System Name: WDID 4SS010395
- 2.2 Collection System Main Point(s) of Contact (name, title, address, email, and telephone number): HARRY FRISBY (310) 412-5333
- 2.3 Type of Sanitary Sewer System (select ONE of the following: Municipal, Park, School, Military, Hospital, Prison, Airport, Port, Other) **MUNICIPAL**
- 2.4 What is the population served by your agency's sanitary sewer system? **109,712**
- 2.5 What is this fiscal year's budget for operation and maintenance sanitary sewer system facilities? **\$1,903,451**
- 2.6 What is this fiscal year's budget for capital expenditures for sanitary sewer system facilities? **\$1,703,822**

For questions 2.7 - 2.10, please identify the total number of employees (technical and mechanical) for your agency's sanitary sewer system (including pump station operations) working within the different classifications listed below.

- 2.7 Entry Level (Less than 2 years experience)
Number of agency employees? **0**
- 2.8 Journey Level (Greater than or equal to 2 years experience)
Number of agency employees? **3**
- 2.9 Supervisory Level
Number of agency employees? **1**
- 2.10 Managerial Level
Number of agency employees? **1**

For questions 2.11 - 2.14, please identify the total number of employees who hold CWEA Certification for Collection System Maintenance for your agency's sanitary sewer system (including pump station operations) for the various Certificates and Grades levels listed below.

- 2.11 Grade I
Number of certified (Grade I Collection System Maintenance) agency employees: **NONE**
Number of certified (Grade I Plant Maintenance Technologist) agency employees: **NONE**
- 2.12 Grade II
Number of certified (Grade II Collection System Maintenance) agency employees: **NONE**
Number of certified (Grade II Electrical/Instrumentation Technologist) agency employees: **NONE**
Number of certified (Grade II Mechanical Technologist) agency employees: **NONE**
- 2.13 Grade III
Number of certified (Grade III Collection System Maintenance) agency employees: **NONE**
Number of certified (Grade III Electrical/Instrumentation Technologist) agency employees: **NONE**
Number of certified (Grade III Mechanical Technologist) agency employees: **NONE**
- 2.14 Grade IV
Number of certified (Grade IV Collection System Maintenance) agency employees: **NONE**

Number of certified (Grade IV Electrical/Instrumentation Technologist) agency employees: NO

Number of certified (Grade IV Mechanical Technologist) agency employees: NO

2.15 Estimated Size Distribution of Assets

Diameter of sewer pipe	Gravity Sewers (miles)	Force Mains (miles)
6 inches or less	0.33	0
8 inches	138.26	0
9 - 18 inches	6.35	0
19 - 36 inches	N/A	0
> 36 inches	N/A	0
Unknown Diameter	N/A	0
Totals	145	0

2.16 For which portion of sewer service laterals is your agency responsible? NONE

(If None, skip question 2.17.)

2.17 Estimated total miles of sewer service laterals (upper and lower) for which your agency is responsible? NONE

2.18 Number of sewer service lateral connections? 17,573

2.19 Estimated total miles of easements within your sanitary sewer system? 2 MILES

2.20 What is your total easement sewer system cleaning production in miles/year? 0.17 MILES

2.21 What is your total gravity sewer system cleaning production in miles/year? 127 MILES

2.22 Does your agency own any separately enrolled collection systems? [Y/N] N

2.23 If yes to question 2.22, which collection system(s) does your agency own?

Collection System name(s): N/A

Collection System WDID(s): N/A

2.24 Which wastewater treatment plant(s) (WWTPs) ultimately receive wastewater from this collection system?

Receiving Treatment Plant name(s): LA COUNTY JOINT WATER POLLUTION CONTROL PLANT

Receiving Treatment Plant WDID(s):

2.25 For question 2.24, does your agency own this/these WWTP(s)? [Y/N] N

2.26 Does your collection system discharge into any other collection system(s)]? [Y/N] Y

2.27 If yes to question 2.26, which collection system(s) receive wastewater from this collection system? LOS ANGELES COUNTY SANITATION DISTRICT

Receiving Collection System name(s): LOS ANGELES COUNTY SANITATION DISTRICT – DISTRICT 5

Receiving Collection System WDID(s):

2.28 Do any upstream collection systems greater than 25,000 gallons/day (gpd) discharge into this collection system? [Y/N] N

2.29 If yes to question 2.28, which collection system(s) discharge into this collection system? N/A

Upstream Collection System name(s):

Upstream Collection System WDID(s):

2.30 Estimated Collection System Flow Characteristics for your collection system:

Average Daily Dry Weather Flow (MGD)	Peak Daily Wet Weather Flow (MGD)
8.14 mgd	26.86 mgd
BASED ON RESIDENTIAL AND NON-RESIDENTIAL WATER CONSUMPTION. IT IS ASSUMED THAT 95% OF NON-RESIDENTIAL WATER CONSUMPTION AND 90% OF RESIDENTIAL WATER CONSUMPTION WILL GO INTO THE SEWER SYSTEM.	AS PER SEWER MASTER PLAN THE PEAKING FACTOR IS 3.3

2.31 How many pump stations are there throughout the sewer collection system? NONE

2.32 How many feet of above ground gravity pipelines are there throughout the sewer collection system? NONE

2.33 How many feet of above ground pressurized pipelines are located throughout the sewer collection system? NONE

2.34 How many air relief valves (ARVs) are located throughout the sewer collection system? NONE

2.35 How many siphons are there throughout the sewer collection system? 1 SIPHON

2.36 Specify the percentage of piping and the number of pump stations constructed in the following table below:
(note: total percentage must equal 100%) NO PUMP STATIONS. GRAVITY PIPELINES ARE SHOWN AS FOLLOWS:

	% OF PIPING
4" - 567'	0.1%
6" - 1,203	0.2%
8" - 730,027'	95.4%
10" - 22,806'	3%
12" - 8,586	1%
15" - 2,121'	0.3%

2.37 Has your agency ever conducted any historic flow monitoring for the sewer system to evaluate hydraulic characteristics during weather conditions? [Y/N] Y

2.38 If yes to question 2.37 above, please list all specific dates when flow monitoring was conducted. During the year 2007.

2.39 Does your agency have any permanently installed flow monitor(s) in the collection system? [Y/N] N

2.40 If yes to question 2.38 above, please specific total number of monitor(s) installed. 5

Age	Source of Age Info. (records, estimated, etc.)	Gravity & Pressure Sewers (%)	Pump Stations ² 25k Gal/day & Over (number of stations)	Pump Stations ¹ Under 25k Gal/day (number of stations)
2000 - Present	RECORDS	[%] 1.1	[# or ENTER ZERO] 0	[# or ENTER ZERO] 0
1980 - 1999	RECORDS	[%] 3	[# or ENTER ZERO] 0	[# or ENTER ZERO] 0
1960 - 1979	RECORDS	[%] 5.2	[# or ENTER ZERO] 0	[# or ENTER ZERO] 0
1940 - 1959	RECORDS	[%] 18.6	[# or ENTER ZERO] 0	[# or ENTER ZERO] 0
1920 - 1939	RECORDS	[%] 72.1	[# or ENTER ZERO] 0	[# or ENTER ZERO] 0
1900 - 1919		[%] 0	[# or ENTER ZERO] 0	[# or ENTER ZERO] 0
Before 1900		[%] 0	[# or ENTER ZERO] 0	[# or ENTER ZERO] 0
Unknown Age		[%] 0	[# or ENTER ZERO] 0	[# or ENTER ZERO] 0
Totals		[%] 100	[# or ENTER ZERO] 0	[# or ENTER ZERO] 0

¹ For pump stations, flow categories are the maximum flow rate occurring over a 24-hr period based on annual operating data. Age is date asset was originally constructed.