Law Office of Jack Silver

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



Via Certified Mail – Return Receipt Requested

June 30, 2025

Michael Futrell, City Manager Members of the City Council Head of Agency City of Riverside 3900 Main St Riverside, CA 92522-0002

Gilbert Hernandez, Deputy Public Works Director George Munoz, Environmental Services Coordinator Riverside Regional Water Quality Control Plant 5950 Acorn St Riverside, CA 92504-1036

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

Dear Mr. Futrell, Mr. Hernandez, Mr. Munoz, Members of the City Council, and Head of Agency:

STATUTORY NOTICE

This Notice Letter ("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 City of Riverside's ownership and operation of the Riverside Regional Water Quality Control Plant ("Plant") and its associated wastewater collection system which transports wastewater for treatment to the Plant prior to discharge to the Santa Ana River – a water of the United States.

River Watch hereby places the City of Riverside ("City"), as owner and operator of its 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 Santa Ana Regional Water Quality Control Board ("RWQCB-SA") Water Quality Control Plan ("Basin Plan"), as the result of violations of the City's National Pollutant Discharge Elimination System Permit, CA0105350 ("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 a discharger which has been issued permit(s) 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 an 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-SA.

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 the City comply with the RWQCB-SA 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 NPDES Permit contains the following standard condition: "The Discharger 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 Discharger to achieve compliance with the conditions of this Order ..." NPDES Permit Attachment D (Standard Provisions), I (Permit Compliance), D (Proper Operation and Maintenance).

All dischargers are required to operate and maintain wastewater collection facilities in a manner which ensures the facilities are adequately staffed, supervised, financed, operated, maintained, repaired, and upgraded as necessary, in order to provide adequate and reliable transport and disposal of all wastewater from both existing and planned future wastewater sources under the dischargers' service responsibilities.

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 that is the subject of this Notice is NPDES No. CA0105350, "Waste Discharge and Water Reclamation Requirements for the City of Riverside, Department of Public Works Riverside Regional Water Quality Control Plant Riverside County." River Watch has identified specific violations of the NPDES Permit, including violations of 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. River Watch specifically alleges the City violates its NPDES Permit which states:

- "The discharge of wastewater at a location or in a manner different from those described in this Order is prohibited." NPDES Permit Section III.A (Discharge Prohibitions); see also NPDES Permit Attachment F (Fact Sheet), IV. (Rationale for Effluent Limitations and Discharge Specifications for Surface Water Discharges) A; and
- "The bypass or overflow of untreated wastewater or wastes to surface waters or surface water drainage courses is prohibited, except as allowed in Standard Provisions (Attachment D), section I.G." NPDES Permit Section III.B (Discharge Prohibitions).
 - A. SSOs, Inadequate Reporting of Discharges, Failure to Warn, Failure to Mitigate Impacts, Collection System Subsurface Discharges, Failure to Maintain Adequate Contingency Plan and Spill Prevention Plan

River Watch is understandably concerned as to the effects of both surface and underground sewer system overflows (SSOs) on critical habitat in and around the City's diverse and sensitive ecosystem. The NPDES Permit lists the beneficial uses of the Santa Ana River – a water of the United States. NPDES Permit Table 5 – Basin Plan Beneficial Uses; Attachment F (Fact Sheet), C. (State and Federal Regulations, Policies, and Plans), C.1 (Water Quality Control Plans), Table 3 (Basin Plan Beneficial Uses).

1. SSOs

SSOs, in which untreated sewage is discharged above ground from the wastewater collection system prior to reaching the Plant, are alleged to have occurred both on the dates identified in California Integrated Water Quality System ("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 Santa Ana River. These SSOs impact the water quality and beneficial uses of the Santa Ana River and its tributaries. 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 – <u>Summary Page</u> (Attachment A) identifies 330 SSOs, resulting in 3,997,102 gallons of raw sewage discharged into the environment. Of this total volume, the City acknowledges at least 2,183,627 gallons, or 54% of the total, reached a surface water. A review of the City's records indicates an even greater percentage of SSOs may have reached a drainage to a surface water or a surface water itself. All sewage discharged into the environment poses both a nuisance pursuant to Calif. Water Code § 13050(m), and an imminent and substantial endangerment to public health and the environment. NPDES Permit Section VI.A (Standard Provisions) specifically provides that "[n]either the treatment nor the discharge of waste shall create, or threaten to create, a nuisance or pollution as defined by Section 13050 of the California Water Code."

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

2. <u>Inadequate Reporting of Discharges</u>

The City's NPDES Permit Attachment D – Standard Provisions, V. ("Standard Provisions – Reporting"), E. ("Twenty-Four Hour Reporting") 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

¹ River Watch notes the City reports that of the 3,997,102 gallons of sewage spilled, 3,645,172 gallons or 91% of the total amount was recovered. River Watch is concerned with the accuracy of this statement as the "Percent Recovered" (91%) appears to conflict with the "Percent Reached Surface Water" (59.9%). Further explanation is required.

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.

3. Failure to Warn

The City is required 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 an analysis of the City's reports, 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

The City's NPDES Permit Attachment D - Standard Provisions, C. (Duty to Mitigate), states: "The Discharger 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. River Watch notes that the City's most recent "Sewer System Management Plan" ("SSMP"), revised June, 2022, references compliance with the now outdated Order WQ 2006-0003-DWQ. 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. <u>Collection System Subsurface Discharges</u>

It is a well-established fact that exfiltration caused by pipeline cracks and other structural defects in a wastewater collection system result in discharges to adjacent surface waters via underground hydrological connections. River Watch is concerned that sewage is being 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 Santa Ana River and its tributaries. Surface waters become contaminated with pollutants including human pathogens. Chronic failures in a wastewater 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 is required to maintain a Contingency Plan for its wastewater collection system in order to ensure that existing facilities remain in, or are rapidly returned to, operation in the event of a process failure or emergency incident. The City is required 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 is required to maintain a Spill Prevention Plan in order to prevent accidental discharges from the collection system and minimize the effects of such discharges. The City is required 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.

River Watch contends that 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.

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, and further failed to satisfy the requirements in the City's NPDES Permit because it did not 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 by failure 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.

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 Riverside 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 Plant 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 June 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, 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

David Weinsoff, Esq. Law Office of David J. Weinsoff 138 Ridgeway Avenue Fairfax, CA 94930 Tel. (415) 460-9760

Email: david@weinsofflaw.com

RECOMMENDED REMEDIAL MEASURES

River Watch looks forward to meeting with City staff to tailor remedial measures to the specific operation of its 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. Completing 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. Mitigating the effects of SSOs.
- 3. Ensuring adequate public and worker safety, including protocols to minimize exposure to infectious vectors.
- 4. Eliminating the use of chemical root control.
- 5. Considering a Supplemental Environmental Project in lieu of penalties.
- 6. In the event the City's wastewater will be used by the Plant to produce fertilizer, the City shall require the Plant to initiate monitoring for the chemicals known as PFAS, commonly referred to as "Forever Chemicals," consistent with EPA, SWRCB, and RWQCB-SA requirements.
- 7. Investigate and report on use of Bio-Organic Catalyst (see https://bio-organic.com/wastewater-treatment-collection-systems/ for wastewater treatment, anaerobic digestion, nontoxic cleaning, and management of organic wastes.

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, the City's requirement that the Plant implement 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 First Class Mail

Lee M. Zeldin - Administrator U.S. Environmental Protection Agency 1200 Pennsylvania Ave. NW Mail Code 1101A Washington, D.C. 20460 Josh F.W Cook - Regional Administrator U.S. Environmental Protection Agency Pacific Southwest, Region 9 75 Hawthorne Street Mail Code ORA-1 San Francisco, CA 94105

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

ATTACHMENT A

California Home

Wednesday, June 25, 2025



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 (Riverside City)
- 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).

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

[VIEW PRINTER FRIENDLY VERSION]

[EXPORT THIS REPORT TO EXCEL]

[EXPORT ALL SPILL DETAILS TO EXCEL]

							Total							
							Volume		Percent					
				Total	Total	Total	Reached		Reached		Miles		Number	
		Sanitary		Number	Volume	Volume	Surface	Percent	Surface	Miles of	of		of	
	Responsible	Sewer		of	of Spills	Recovered	Water	Recovered	Water	Pressure	Gravity	Miles of	Pump	
Region	Agency	System	WDID	Spills	(gal)	(gal)	(gal)	(%)	(%)	Sewer	Sewer	Laterals	Stations	
	Riverside	Riverside												Operational
8	City	City CS	8SSO10560	330	3,997,102	3,645,172	2,183,627	91	54	11.0	782.0	356.0	18	Performance
				330	3,997,102	3,645,172	2,183,627			11.0	782.0	356.0	18.0	

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

Wednesday, June 25, 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 (Riverside City)
- Spill Type (Category 1; Category 2))
- Agency (Riverside City)
- Agency (Riverside City)

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: 8

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Spill Appearance Point	System Failure Location	Spill Vol Reached Surface Water (gal)	Spill Vol Recovered (gal)	Spill Vol (gal)	Spill Start Date	Spill Category	WOID	Sewe System	Responsible Agency	Event Region
Manhole	Manhole	5,500	7,700	13,200	2021-07-24 08:50	Category 1	8SSO10560	Riverside City CS	Riverside City	<u>875478</u> 8
Other sewer system structure	Construction Bypass Operation	350	175	350	2021-10-06 09:13	Category 1	8SSO10560		Riverside City	<u>876796</u> 8
Gravity Mainline;Manhole	Gravity Mainline	0	1,397	1,397	2022-11-14 07:00	Category 2	8SSO10560	Riverside City CS	Riverside City	884292 8
Manhole;Other sewer system structure	Private Main	79,638	0	79,638	2022-12-21 04:00	Category 1	8SSO10560	Riverside City CS	Riverside City	<u>884917</u> 8
Manhole	Gravity Mainline	0	8,400	8,400	2023-01-22 15:20	Category 2	8SSO10560	Riverside City CS	Riverside City	<u>885694</u> 8
Manhole	Gravity Mainline	0	0	1,956	2023-02-03 17:57	Category 2	8SSO10560	Riverside City CS	Riverside City	<u>885947</u> 8
Manhole	Gravity Mainline, Manhole		0	39,738	2023-12-17 15:32	Category 2 Spill	8SSO10560	Riverside City CS	Riverside City	<u>891597</u> 8
Lower Lateral (Public)	Lower Lateral	7,200	0	7,200	2023-06-29 10:38	Category 1 Spill	8SSO10560	Riverside City CS	Riverside City	<u>894597</u> 8
Lower Lateral (Public)	Lower Lateral	7,225	0	7,225	2023-06-29 11:58	Category 1 Spill	8SSO10560	Riverside City CS	Riverside City	<u>894599</u> 8
Manhole	Gravity Mainline	0	85	90	2024-08-14 11:00	Category 1 Spill	8SSO10560	Riverside City CS	Riverside City	<u>896081</u> 8
Manhole	Manhole	7,838	12,777	20,615	2024-09-26 10:41	Category 1 Spill	8SSO10560	Riverside City CS	Riverside City	<u>896719</u> 8
Lateral Clean Out (Private), Manhole	Gravity Mainline	18,347	11,911	30,258	2024-11-18 08:30	Category 1 Spill	8SSO10560	Riverside City CS	Riverside City	<u>897566</u> 8
Other (specify below)	Air Relief Valve (ARV)/ Blow-Off Valve (BOV),Force Main	20,240	19,500	39,740	2025-03-05 12:25	Category 1 Spill	8SSO10560	Riverside City CS	Riverside City	900182 8
Manhole	Gravity Mainline	480	220	700	2025-03-12 11:20	Category 1 Spill	8SSO10560	Riverside City CS	Riverside City	900300 8
Manhole	Manhole		2,300	155,147	2025-03-16 00:00	Category 2 Spill	8SSO10560	Riverside City CS	Riverside City	900379 8
Lower Lateral (Public)	Lower Lateral	786	50	1,042	2025-05-22 08:40	Category 1 Spill	8SSO10560	Riverside City CS	Riverside City	<u>901367</u> 8
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