



**HUMBOLDT COMMUNITY SERVICES DISTRICT  
BOARD OF DIRECTORS  
REGULAR SCHEDULED MEETING**

**AGENDA**

**DATE:** Tuesday, August 9, 2022

**TIME:** 5:00 p.m.

**LOCATION:** *In accordance with Assembly Bill 361 and District Resolution 2022-10, public meetings will be conducted both in person at 5055 Walnut Drive in Eureka, California, and telephonically through Zoom.*

*The HCSD Boardroom is open to the public during open session segment(s) of the meeting. If you cannot attend in person and would like to speak on an agenda item including Public Participation, please join through the Zoom website (<https://zoom.us>) then clicking "Join A Meeting" and enter the following Meeting ID and prompts for passcode and audio. Access may also be achieved by telephone only by dialing 1-669-900-9128 followed by the Meeting ID and Passcode below:*

*Meeting ID: 889 7297 2586 Passcode: 832530*

*Zoom participation protocol:*

- Please use the MUTE function when not speaking*
- Please use the "RAISE HAND" feature when wishing to be acknowledged for participation. Raise Hand feature is located in the lower right portion of the screen via the "REACTIONS" icon.*
- Please do not speak out of turn; wait for the Board President to call upon you to share.*

**A. CALL TO ORDER AND ROLL CALL**

**B. PLEDGE OF ALLEGIANCE**

**C. CONSENT CALENDAR**

1. Approval of August 9, 2022 Agenda *Pgs 1-2*
2. Approval of Minutes of the Regular Meeting of July 26, 2022 *Pgs 3-5*
3. Consideration of Resolution No. 2022-12 Making Findings Pursuant to Government Code Section 54953, as Amended by Assembly Bill 361, and Authorizing the Continued Use of Virtual Meetings for Another 30 Days *Pgs 7-8*

**D. REPORTS**

1. General Manager
  - a) GM Report *Pg 9*
2. Superintendent
  - a) July 2022 Construction Operations Report *Pg 11*

3. Finance Department

a) July 2022 Check Register

Pgs 13-20

4. Legal Counsel

5. Director Reports

6. Other

**E. PUBLIC PARTICIPATION \*\***

\*\*Members of the public will be given the opportunity to comment on items not on the agenda. Please use the information set forth above to participate via Zoom. The Board requests that speakers please state their name and where they are from, be clear, concise and limit their communications to 3 to 5 minutes. At the conclusion of all oral communications, the Board or staff may choose to briefly respond with information in response to comments; however, the Brown Act prohibits discussion of matters not on the published agenda. Matters requiring discussion, or action, will be placed on a future agenda.

**F. NON-AGENDA**

**G. NEW BUSINESS**

**H. OLD BUSINESS**

**I. CLOSED SESSION**

1. CONFERENCE WITH LEGAL COUNSEL – ANTICIPATED LITIGATION, Significant exposure to litigation pursuant to paragraph (2) OR (3) OF SUBDIVISION (D) OF Section 54956.9: one case. Facts and circumstances involve an assertion by Ecological Rights Foundation of alleged violations of the Clean Water Act by the District relating to its sanitary sewer system.

Pgs 21-62

**J. ADJOURNMENT**

Next Res: 2022-13

Next Ord: 2022-02

In compliance with the Americans with Disabilities Act, if you need special assistance to participate in this meeting, please contact Brenda Franklin at (707) 443-4558, ext. 210. Notification 48 hours prior to the meeting will enable the District to make reasonable arrangements to ensure accessibility to this meeting (28 CFR 35.102 – 35.104 ADA Title II).

Pursuant to §54957.5(a) of the California Government Code, any public record writings relating to an agenda item for an open session of a regular meeting of the Board of Directors, not otherwise exempt from public disclosure, are available for public inspection upon request at the District offices located at 5055 Walnut Drive, Monday through Friday (holidays excepted) during regular business hours.

DRAFT – MINUTES OF THE REGULAR MEETING  
OF THE BOARD OF DIRECTORS OF THE  
HUMBOLDT COMMUNITY SERVICES DISTRICT

The Board of Directors of the Humboldt Community Services District met in Regular Session at 5:00 p.m. on Tuesday, July 26, 2022, in person and via tele/video conference in accordance with AB 361 and HCSD Resolution 2022-10.

**A. CALL TO ORDER AND ROLL CALL**

Present upon roll call were Directors, Bongio, Gardiner, Hansen, and Matteoli. Director Benzonelli connected remotely at 5:04 p.m. Staff in attendance: General Manager Williams (GM), Superintendent Latham, Finance Manager Montag (FM) and Assistant Engineer Adams (AE).

**B. PLEDGE OF ALLEGIANCE**

President Bongio invited those present to join him in the Pledge of Allegiance.

**C. CONSENT CALENDAR**

1. Approval of July 26, 2022 Agenda
2. Approval of Minutes of the Regular Meeting of July 12, 2022

Public Comment: None

DIRECTOR HANSEN MOVED, DIRECTOR MATTEOLI SECONDED, TO ACCEPT AND APPROVE THE JULY 26, 2022 CONSENT CALENDAR. MOTION CARRIED UPON THE FOLLOWING ROLL CALL VOTE:

AYES: BONGIO, GARDINER, HANSEN, MATTEOLI  
NOES: NONE  
ABSENT: BENZONELLI

**D. REPORTS**

1. General Manager
  - a) GM Report

Rate Study – HCSD staff and NBS consulting staff met to review preliminary results. NBS will update the items discussed and provide a working model for HCSD staff review. It is hoped the COE preliminary results be available by mid-August to increase the accuracy of the District's projected sewer expenses. Public meetings will be coordinated soon thereafter.

South Broadway Forcemain – The GM & FM participated in an introduction meeting with Cal-OES representatives to ensure District staff follow required reporting, accounting, and procurement procedures.

DRAFT – MINUTES OF THE REGULAR MEETING  
OF THE BOARD OF DIRECTORS OF THE  
HUMBOLDT COMMUNITY SERVICES DISTRICT  
July 26, 2022

Staffing – A candidate to fill the open position within the Maintenance Department has been selected and is currently going through the pre-employment process.

2. Engineering

a) Engineering Department Update

Hemlock Sewer Reversal – Details of the design plans for connecting approximately 1,000-feet of gravity sewer main from the North Cutten sewer system to the Martin Slough Interceptor were presented.

3. Superintendent

a) May/June 2022 Operations/Maintenance Report

Reviewed the standard department activities emphasizing upon cleaning 12,826 ft. of sewer main, 840 ft. of sewer lateral lines, and the wet well at the Sequoia lift station. The Bailey sewer lift station experienced a sewer overflow on May 16 – all necessary notifications and repairs were made, the affected area cleaned, and returned the station to normal operations.

4. Finance Department

a) June 2022 Budget Statement

FM reviewed the report commenting there are additional items to be included in the final fiscal year month such as interest earned and property taxes not yet available from the County Assessor as well as final City of Eureka billing for wastewater treatment/CIP expenses.

**E. PUBLIC PARTICIPATION**

None.

**G. NEW BUSINESS**

1. Consideration of Adopting Resolution 2022-11 Amending the District's Conflict of Interest Code

GM summarized the proposed modification to remove the Community Services Manager and add the Engineering classification.

PUBLIC COMMENT: None

DRAFT – MINUTES OF THE REGULAR MEETING  
OF THE BOARD OF DIRECTORS OF THE  
HUMBOLDT COMMUNITY SERVICES DISTRICT  
July 26, 2022

IT WAS THEN MOVED BY DIRECTOR MATTEOLI, SECONDED BY  
DIRECTOR GARDINER, TO ADOPT RESOLUTION 2022-11 AMENDING THE  
DISTRICT CONFLICT OF INTEREST CODE. MOTION CARRIED UPON THE  
FOLLOWING ROLL CALL VOTE:

AYES: BENZONELLI, BONGIO, GARDINER, HANSEN, MATTEOLI  
NOES: NONE  
ABSENT: NONE

Director Hansen announced recusal from the Closed Session item due to his position as  
Deputy Public Works Director for the City of Eureka and left the meeting.

**I. CLOSED SESSION**

1. CONFERENCE WITH LEGAL COUNSEL – INITIATION OF LITIGATION  
Pursuant to Gov. Code §54956.9(d)(4): One potential case

It was then moved by Director Gardiner, seconded by Director Benzonelli to  
move into closed session

The Board returned to open session at 6:10 p.m. after meeting with Special Legal  
Counsel advising no action to report.

**I. ADJOURNMENT**

There being no further business, IT WAS MOVED BY DIRECTOR MATTEOLI,  
SECONDED BY DIRECTOR GARDINER, TO ADJOURN. MOTION CARRIED  
UPON THE FOLLOWING ROLL CALL VOTE:

AYES: BENZONELLI, BONGIO, GARDINER, MATTEOLI  
NOES: NONE  
ABSENT: HANSEN

THE BOARD ADJOURNED ITS REGULAR MEETING OF JULY 26, 2022 AT 6:11 P.M.

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Submitted, Board Secretary

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# Humboldt Community Services District

*Dedicated to providing high quality, cost effective water and sewer service for our customers*

## AGENDA REPORT

For HCSD Board of Directors Regular Meeting of: August 9, 2022

**AGENDA ITEM:** C.3 (Consent Calendar)

**TITLE:** Consideration of Resolution 2022-12 Making Findings Pursuant to Government Code Section 54953, as Amended by Assembly Bill 361, and Authorizing the Continued Use of Virtual Meetings

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### Recommendation:

Motion to adopt Resolution 2022-12 by title only. Roll-call vote.

### Summary:

The Governor's Executive Order N-08-21 provided modification to the Brown Act authorizing public teleconference meetings during the COVID-19 Emergency without the requirement of personal appearance. On September 16, 2021, Governor Newsom signed Assembly Bills (AB) 339 and 361 into law which was followed by Executive Order N-15-21 on September 20, 2021 stipulating the sunset of Executive Order N-08-21 as of September 30, 2021.

As presented at the October 12, 2021 regular meeting, and subsequently at each first meeting of the month, provisions of AB 361 officially modify the Brown Act to enable public agencies to move immediately to relaxed teleconference meetings under a declared state of emergency. Each month the March 20, 2020 state of emergency remains in effect, the Board is required to pass a resolution every thirty (30) days until lifted, affirming the following:

1. The Board has considered the circumstances of the state of emergency
2. Any of the following circumstances exist:
  - a. The state of emergency continues to directly impact the ability of the members to meet safely in person.
  - b. State or local officials continue to impose or recommend measures to promote social distancing.

Resolution 2022-12 before you, affirms the foregoing conditions allowing the District to proceed with virtual meetings for the next thirty (30) days while the current state of emergency remains in effect and/or the County's recommendations for social distancing remain in effect. Although many restrictions have been lifted, to date there is no estimate as to when the state of emergency will be rescinded.

**Fiscal Impact:** None

**RESOLUTION NO. 2022-12**

**A RESOLUTION OF THE BOARD OF DIRECTORS OF THE HUMBOLDT COMMUNITY SERVICES DISTRICT MAKING FINDINGS PURSUANT TO GOVERNMENT CODE SECTION 54953, AS AMENDED BY ASSEMBLY BILL 361, AND AUTHORIZING THE CONTINUED USE OF VIRTUAL MEETINGS**

**WHEREAS**, as a result of the COVID-19 pandemic, the Governor issued Executive Order Nos. N-08-21, N-25-20 and N-29-20, which suspended certain provisions of the Ralph M. Brown Act to allow legislative bodies to conduct public meetings without strict compliance with the teleconferencing provisions of the Brown Act;

**WHEREAS**, Assembly Bill 361, which was signed into law on September 20, 2021, amended Government Code section 54953, to provide relief from the teleconferencing provisions of the Brown Act under certain circumstances provided the legislative body makes certain findings;

**WHEREAS**, as a result of the COVID-19 pandemic, the Governor proclaimed a state of emergency on March 4, 2020, in accordance with the section 8625 of the California Emergency Services Act, and the state of emergency remains in effect;

**WHEREAS**, as a result of the COVID-19 pandemic, the Humboldt County Health Officer has imposed and has recommended measures to promote social distancing as more particularly set forth in his August 6, 2021, Order, among other prior orders and guidance;

**NOW, THEREFORE**, the Board of Directors does hereby find and resolve as follows:

1. That the Board has reconsidered the circumstances of the previously declared and existing state of emergency arising from the COVID-19 pandemic;
2. That the state of emergency continues to directly impact the ability of the members of the Board to meet safely in person, and further that local officials continue to impose or recommend measures to promote social distancing;
3. That the Board may continue to conduct public meetings in accordance with Government Code section 54953(e);
4. That the Board will reconsider the above findings within 30-days of this Resolution.

**PASSED AND ADOPTED** on the 9<sup>th</sup> day of August 2022 by the following vote:

AYES:  
NAYS:  
ABSENT:  
ABSTAIN:

ATTEST:

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Alan Bongio, Board President

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Attest: Brenda K. Franklin  
Board Secretary

# Humboldt Community Services District

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*Dedicated to providing high quality, cost effective water and sewer service for our customers*

## MEMORANDUM

TO: Board of Directors

FROM: Terrence Williams, General Manager

DATE: August 5, 2022

SUBJECT: General Manager Report for August 9, 2022 Board Meeting

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### South Broadway Forcemain

The South Broadway Forcemain project involves replacement of a pressurized sewer pipe that conveys wastewater from Humboldt Hill to the Wastewater Treatment Plant. The new pipe will be laid alongside the existing pipe for a majority of the length. The existing pipe traverses the City of Eureka's Elk River Estuary Enhancement Project. The City's project includes a 50-foot-wide roadway crossing over the existing pipe and the proposed pipeline alignment. When the City builds this roadway, they will be building up the existing grade at that location by about five feet. This means that to install the new pipe, the District would need to dig a 10 to 15 foot deep trench across the City's new roadway and then replace the disturbed section of new roadway to the then existing conditions; new roadway. This would add significant cost to the project.

District staff is currently in discussion with the City and the engineers managing the Elk River Estuary Project to allow a casing to be installed under the area where the City's new roadway will be built. This casing will allow the District to install the new pressurized sewer line without disturbing the City's new roadway saving significant effort and expense at the time of installation. The City seems to be onboard and we believe we have the details worked out. We are planning to install the casing in the next week or two.

### Staffing

Front Office staffing has been a challenge for the past several months and will continue to be a challenge for a while. Our front office is currently staffed with one long term employee and two temporary employees. One of the temporary employees, Jen, was brought onboard, to cover for another employee while she takes a leave of absence. The other temporary employee was a District employee for about five years and agreed to come back, temporarily, because one of our front office staff retired unexpectedly; we needed somebody to fill in immediately and Janelle was gracious enough to agree to help us out until the end of the year while we identify a permanent replacement. Recently, Norma has indicated that she will be retiring at the end of November. Norma has been with the District for over ten years and will be missed dearly.

The challenge is that we will need to identify two new permanent employees by the first of the year. Jen, one of the temporaries, is doing a great job, but we still need to identify at least one more permanent person. The knowledge and experience deficit will be felt for some time as we figure things out.

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# Humboldt Community Services District

*Dedicated to providing high quality, cost effective water and sewer service to our customers*

## **BOARD MEMORANDUM**

To: H.C.S.D. Board of Directors  
From: Tim Latham, District Superintendent  
Date: August 1, 2022  
Subject: July 2022 Construction Operations Report

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General business for the month of July included a water service line leak repair on Irving Drive, water main line leak repairs on Spring Street and Walnut Drive, installing a new water and sewer service on Pennsylvania Avenue, upsizing a ¾" water service to 1" on Rancho Vista Drive, splitting existing water service lines on Park Street and Humboldt Hill Road, sidewalk replacement on John Hill Road due to a water main break, flow testing a fire hydrant on Humboldt Hill and hot asphalt trench line paving at multiple sites.

Other business included performing vehicle and equipment maintenance, water meter reading, customer service orders, hauling dirt to fill sites, District yard clean-up and organization and cross training with the Operations/Maintenance Department.

Capital Improvement Project (CIP) business included the completion of a new water main line on Park Street as part of the Park Street Steel Water Main Line Replacement Project.

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# Accounts Payable

## Checks by Date - Detail by Check Date

User: FM  
 Printed: 8/4/2022 10:50 AM

Humboldt Community Services District  
 5055 Walnut Drive – Eureka CA 95503  
 PO Box 158 – Cutten CA 95534 (707) 443-4558

Check No	Vendor No Invoice No	Vendor Name Description	Check Date Reference	Check Amount
55449	A910 02373	AWWA: CA-NV Section Cross Connection Specialist Certification Renew	07/08/2022	120.00
Total for Check Number 55449:				120.00
55450	C410 June 2022 June 2022	City of Eureka: SW General 79% Humboldt Hill 21%	07/08/2022	96,462.16 25,641.84
Total for Check Number 55450:				122,104.00
55451	C450 INV03192	City of Eureka: Water Test Microbiological Testing - May	07/08/2022	595.00
Total for Check Number 55451:				595.00
55452	E330 531381/7	Englund Marine and Industrial Supply COE Enhancement Project/Brightside blue glo w	07/08/2022	144.81
Total for Check Number 55452:				144.81
55453	E485 06302022 120623/3 120726/3 120728/3 120816/3 121264/3 121327/3 121332/3	Cooney Parris and Rieke Corp Discount Earned - June Unit #18/Back door repair/Hardware Screws Tools/White and yellow paint mark Unit #18/Vac door repair/Hardware screws Leak detector/Battery Constr Traffic Control/Midland 2-way radio John Hill/Sidewalk Repair/2x6x10 DR #2Btr John Hill/Sidewalk Repair/Cr return 2x6x10 #2E	07/08/2022	-7.89 35.75 10.32 33.29 12.92 59.25 18.88 56.10
Total for Check Number 55453:				218.62
55454	E558 279284 282024	NAPA Auto Parts of Eureka 2.5 Blue Def Construction vehicles	07/08/2022	42.59 49.13
Total for Check Number 55454:				91.72
55455	E650 79076	Eureka Ready Mix Yard/Pea gravel/Base	07/08/2022	844.49
Total for Check Number 55455:				844.49
55456	H010 06302022 S012521946.001 S012522418.001 S012561785.001 S012566201.001 S012566761.001	Keenan Supply Discount Earned - June Eil River Crossing Repair/Romac 611 9.05 restr Elk River Crossing Repair/Flg x Flg di spool Myrtle Ave Main Breaks/Replacements Krausz F Yard/8 150 316SS NutBolt kit Yard Restock/SB Full Circle redi clamp pep	07/08/2022	-81.77 1,715.90 1,071.63 686.13 458.07 803.53

Check No	Vendor No Invoice No	Vendor Name Description	Check Date Reference	Check Amount
	S012569879.001	Credit/Return S009886689.002/MJXflng adpt		-268.76
			Total for Check Number 55456:	4,384.73
55457	H410 15899000	Humboldt Bay Municipal Water D Water Purchased - June	07/08/2022	88,467.53
			Total for Check Number 55457:	88,467.53
55458	I525 215240	Infosend Postage deposit increase	07/08/2022	1,733.71
			Total for Check Number 55458:	1,733.71
55459	I700 5098138	IBS Interstate Battery System Fields Landing SLS/Generator battery/31P-MHI	07/08/2022	162.54
			Total for Check Number 55459:	162.54
55460	J800 142828	Johnson's Mobile Rentals LLC Rental fencing for the Ridgewood Temporary Wi	07/08/2022	252.78
			Total for Check Number 55460:	252.78
55461	M230 M230726 M230987	Mendes Supply Co PSCQcarbaccide 30gal Drum Deposit	07/08/2022	809.82 -120.00
			Total for Check Number 55461:	689.82
55462	M450 517127579 517168235 517214239 517257473 517301774	Mission Linen Uniforms/Mats Uniforms/Mats Uniforms/Mats Uniforms/Mats Uniforms/Mats	07/08/2022	239.00 407.32 238.43 403.93 236.97
			Total for Check Number 55462:	1,525.65
55463	N430 032521/1	Nilsen Feed and Grain Co. Unit #18/Back door repair/4x6 rubber mat 3/4"	07/08/2022	68.82
			Total for Check Number 55463:	68.82
55464	P006 027763815 027763815 027763815-1 027763815-1	PACE Supply Corp. So Bdwy COE PP/Discount Earned So Bdwy COE PP/(2) 14" repair clamps So Bdwy COE PP/(1) 14" X 6" tapping sleeve fo So Bdwy COE PP/Discount Earned	07/08/2022	-57.97 2,898.37 2,233.49 -44.67
			Total for Check Number 55464:	5,029.22
55465	P430 042393 043767 044194 045490 047438 06302022	Pierson Building Center Concrete forms/fir stakes Web duster/12" adj wrench/pipe wrench/Yel pair Planting hoe v blade 60" wd handle Tools/Emerald 72" constr bar 81-S70 Allard Ave/80# Premix concr Discount Earned - June	07/08/2022	45.92 89.77 39.32 152.93 42.01 -4.71
			Total for Check Number 55465:	365.24

Check No	Vendor No Invoice No	Vendor Name Description	Check Date Reference	Check Amount
55466	R750 13132	R. J. Ricciardi Inc. Progress billing through June	07/08/2022	647.50
Total for Check Number 55466:				647.50
55467	S117 2208192-02 2208192-02	Sage Designs Inc GeoSCADA Level 1 Training Course Registratic SCADAPack 474 Controller	07/08/2022	2,200.00 6,193.47
Total for Check Number 55467:				8,393.47
55468	T410 1007904-01 1008573-01 1008803-01	Malcolm Kelly Inc. Elk River Crossing Repair/8' MJxFlange DI 90 d Yard Restock from Myrtle Area Main/Hymax 2 c Yard Restock from Circle Dr Vernon John Hill 6'	07/08/2022	634.59 2,010.20 3,015.30
Total for Check Number 55468:				5,660.09
55469	U410	United Way of Humboldt PR Batch 00001.07.2022 UNITED WAY PR Batch 00001.07.2022 UNITED WAY PR Batch 00001.07.2022 UNITED WAY	07/08/2022 PR Batch 00001.07.2022 UNI PR Batch 00001.07.2022 UNI PR Batch 00001.07.2022 UNI	0.87 0.91 2.22
Total for Check Number 55469:				4.00
55470	V700 INV 22-556660	Valley Pacific Petroleum Services Inc Fuel	07/08/2022	7,698.27
Total for Check Number 55470:				7,698.27
55471	W208 1039	Watt's Cleaning Services Cleaning services for June 2022	07/08/2022	950.00
Total for Check Number 55471:				950.00
55472	W570 331216	Western Chain Saw Chain/Head/Mower blade	07/08/2022	163.83
Total for Check Number 55472:				163.83
Total for 7/8/2022:				250,315.84
55489	A160 689339 689339 689339 689339 689339 689339 689339 689339 689339 689339 689339 689339	ACWA-JPIA bDental Plan - Employees cVision Plan - Employees dLife/AD&D Plan - Employees eMedical Plan - Board Members fDental Plan - Board Members gVision Plan - Board Members hLife/AD&D Plan -Board Members iMedical Plan -Retired Members jDental Plan - Retired Members kVision Plan - Retired Members aMedical Plan - Employees	07/21/2022	1,710.04 312.60 384.15 12,562.52 448.76 78.15 30.61 19,351.77 1,192.00 343.86 53,148.44
Total for Check Number 55489:				89,562.90
55490	C670 3890	CWEA - Oakland Annual Mech Tech Renewal Certification/TL	07/21/2022	96.00

Check No	Vendor No Invoice No	Vendor Name Description	Check Date Reference	Check Amount
			Total for Check Number 55490:	96.00
55491	E890 27427908	Express Employment Professionals 6 mos CSR I Temporary Labor PPE 07.03.22	07/21/2022	984.45
			Total for Check Number 55491:	984.45
55492	G310 380-0016160	GHD Inc. Hoover St hazard Mitigation grant assistance	07/21/2022	3,969.64
			Total for Check Number 55492:	3,969.64
55493	J900 0008886	ACWA/Joint Powers Insurance Authority Auto/Property Program/Policy Year 06.01.22 - 0	07/21/2022	27,123.67
			Total for Check Number 55493:	27,123.67
55494	J900 Q4 FY 22 Q4 FY 22 Q4 FY 22 Q4 FY 22	ACWA/Joint Powers Insurance Authority Workers Comp Prog-Water Workers Comp Prog-Sales/Meter Workers Comp Prog-Sewer Workers Comp Prog-Clerical/Brd	07/21/2022	2,352.28 569.61 1,396.27 599.94
			Total for Check Number 55494:	4,918.10
55495	T914 0163276-IN	Tri-Pacific Supply Inc Water line service squeeze tool assembly	07/21/2022	535.59
			Total for Check Number 55495:	535.59
55496	U410	United Way of Humboldt PR Batch 00002.07.2022 UNITED WAY PR Batch 00002.07.2022 UNITED WAY PR Batch 00002.07.2022 UNITED WAY	07/21/2022 PR Batch 00002.07.2022 UNI PR Batch 00002.07.2022 UNI PR Batch 00002.07.2022 UNI	1.51 1.81 0.68
			Total for Check Number 55496:	4.00
55497	W020 13031	W N Tetrault Co. Inc.. Check gas nozzle/Test ok	07/21/2022	120.00
			Total for Check Number 55497:	120.00
			Total for 7/21/2022:	127,314.35
55473	A360 844276	AFLAC Supplemental Health Premium - June	07/26/2022	177.58
			Total for Check Number 55473:	177.58
55474	B284 1513916 1513916	Badger Meter Inc Meters with AMRs for rollout 12 1 Inch meters	07/26/2022	66,938.57 2,948.08
			Total for Check Number 55474:	69,886.65
55475	C180 6001058467 6001058467 6001058467	Canon Solutions America Inc. Office/Black Copies WXD03492-05.31.22-06.25 UseTaxRecoveryFee/OfficeCopier Office/Color Copies WXD03492-05.31.22-06.25	07/26/2022	21.18 9.36 220.58

Check No	Vendor No Invoice No	Vendor Name Description	Check Date Reference	Check Amount
			Total for Check Number 55475:	251.12
55476	C430 06302022	City of Eureka: WA Water Purchased - June	07/26/2022	71,938.00
			Total for Check Number 55476:	71,938.00
55477	C495 52364	Colantuono, Highsmith, Whatley, PC Legal Services	07/26/2022	735.00
			Total for Check Number 55477:	735.00
55478	C036	Corporate Payment Systems	07/26/2022	
	240133921760027	BM/BackflowCrossConnectionCertification/Cen		23.47
	242316821734000	WP/Harbor Freight/Lynch pin kit/PTO pin asstm		41.17
	242316821824000	DT/Harbor Freight/18" Tool box		43.39
	243160521615486	DT/Shell/Fuel		131.47
	244309921664008	TL/Microsoft		90.71
	244921521748947	BM/BackflowCrossConnectionCertification/Stev		34.90
	244921621680000	TW/Lost Coast Comm: CSR I Ad 6/17-7/1/22		180.00
	244939821592008	TW/ACWA: Region 1 7/8/22 Registration - AB		70.00
	244939821732008	TW/ACWA: Region 1 7/7-8/22 Registration - H		70.00
	24493982174200	TW/ACWA: Region 1 7/7-8/22 Registration - M		70.00
	244939821792008	TW/ACWA: Region 1 Event Registration - GG		70.00
	244939821792008	TW/ACWA: Region 1 Event Registration - JM		70.00
	246921621681009	TW/Craigs List: CSR I Ad 6/17-7/16/22		40.00
	246921621751000	BM/BackflowCrossConnectionCertification/BJs		26.00
	246921621751002	TW/Amazon: TK PPE Training Materials		106.66
	246921621761004	BM/BackflowCrossConnectionCertification/BJs		103.30
	246921621762176	TW/Amazon: TK PPE Training Materials		204.48
	246921621762176	TW/Amazon: Cat6 Rj45 Ends 100 Pack Connec		10.99
	246921621771008	BM/BackflowCrossConnectionCertification/BJs		412.92
	249064121691498	TL/DRI Crash Plan		29.97
	249064121791505	TW/ DNHGoDaddy		20.17
	249430021728380	DT/Rite Aid/Covid 19 test		10.91
	249430021728980	DT/Costco/Covid 19 tests		229.36
			Total for Check Number 55478:	2,089.87
55479	E890 27396900	Express Employment Professionals 6 mos CSR I Temporary Labor PPE 06.26.2022	07/26/2022	989.75
			Total for Check Number 55479:	989.75
55480	G310 380-0012650 380-0012650	GHD Inc. Hazard Mitigation Bailey SLS Generators	07/26/2022	1,350.88 11,960.52
			Total for Check Number 55480:	13,311.40
55481	H810 413643 417007	Humboldt Waste Management Auth S Broadway SLS/Greenwaste Elk River Crossing/Solid Waste	07/26/2022	29.89 123.10
			Total for Check Number 55481:	152.99
55482	I525 215494	Infosend UB/Process and Mail/Bills - June	07/26/2022	2,918.59
			Total for Check Number 55482:	2,918.59

Check No	Vendor No Invoice No	Vendor Name Description	Check Date Reference	Check Amount
55483	N030 202206-0894	NBS Professional Services/Rate Study	07/26/2022	700.00
Total for Check Number 55483:				700.00
55484	P190 184269 184288 184390 184623 185090	Pacific Paper Co 1/3 Cut Tab file folders Logitech mouse/Pental mech pencils/Sharpie gr/S Logitech keyboard and mouse/Temp desk Lg divided pencil cup/Pilot Vball blk Lg pencil cup/Letter opener/Dry Erase marker se	07/26/2022	95.48 158.28 48.06 43.11 32.64
Total for Check Number 55484:				377.57
55485	P785 16344 16345	Powell Landscape Materials Concrete for repairs to the Elk River crossing wa Concrete for repairs to the Elk River crossing wa	07/26/2022	217.41 172.62
Total for Check Number 55485:				390.03
55486	R250 28771350	Recology Humboldt County Garbage Service - June	07/26/2022	488.26
Total for Check Number 55486:				488.26
55487	M560 50418	The Mitchell Law Firm LLP Legal Services - June 2022	07/26/2022	208.00
Total for Check Number 55487:				208.00
55488	U730 006198 012714 015513 015985 021483 027719 027851 999207 999207 999207 015661 999207 015661 999207 015661	USA Bluebook Bubbler Air Compressor Hypo Rotary drum Sea Ave SLS/(1) Seametrics IMAG4700R sewer Tools/Sonoscope Leak Detector Sea Ave vault seals Locking security case/Eye wash stn/Gauge to ho Extra flash memory card Blackberry SLS/Mechanical float switches Sea Ave SLS/Mechanical float switches Telesc gate vlve key/2.5 LiqFillGge 30 and 160 p 50' 2-wire Float Switch Marking wand w attachable wheel	07/26/2022	2,434.79 202.25 5,126.53 97.07 488.34 1,969.17 28.02 259.34 259.34 931.66 259.34 113.30
Total for Check Number 55488:				12,169.15
Total for 7/26/2022:				176,783.96
55498	A072 5765	Accurate Drug Testing Services DOT Physical/KN	07/29/2022	100.00
Total for Check Number 55498:				100.00
55499	D807 5091326	DLT Solutions Annual Software Subscription Renewal 08.15.22	07/29/2022	2,711.28
Total for Check Number 55499:				2,711.28
55500	E849 L0636366	Eurofins Eaton Analytical Inc. Hexavalent Chromium analysis at the Spruce Poi	07/29/2022	75.00

Check No	Vendor No Invoice No	Vendor Name Description	Check Date Reference	Check Amount
	L0636371	Hexavalent Chromium analysis at the South Bay		75.00
Total for Check Number 55500:				150.00
55501	E890	Express Employment Professionals	07/29/2022	
	27332530	CSR 1 Temporary Labor June 2022 PPE 06.12.2		991.25
	27361968	CSR 1 Temporary Labor June 2022 PPE 06.19.2		789.48
	28590823	CSR 1 Temporary Labor PPE 07.10.22		788.99
Total for Check Number 55501:				2,569.72
55502	F049	Fastenal Company	07/29/2022	
	CAEUR122559	Cowhide unlined driver's gloves/20 oz Blue marl		205.52
	CAEUR122559	AAA Btry/AA Btry/XL Orange Disp gloves		112.61
Total for Check Number 55502:				318.13
55503	F050	Fastenal Industrial	07/29/2022	
	CAEUR122556	Bath tiss/Multi fold Ppr towel/Cntr pull Ppr towe		276.52
	CAEUR122642	Hubbard 3rd Pump/Valves		3,762.12
	CAEUR122754	16 Gal black can liner		46.44
Total for Check Number 55503:				4,085.08
55504	N030	NBS	07/29/2022	
	202207-1556	Professional Services/Rate Study		4,020.00
Total for Check Number 55504:				4,020.00
55505	P006	PACE Supply Corp.	07/29/2022	
	027798700	Discount Earned - July		-58.88
	027798700	Misc spare parts for the 14" South Broadway sev		2,944.21
Total for Check Number 55505:				2,885.33
55506	P010	Pacific Gas and Electric-GN	07/29/2022	
	08052022	aWA Pump & District/Cummings		7,848.32
	08052022	bHH Water System		12,027.51
	08052022	cFW/MR Water System		900.00
	08052022	dGeneral Sewer System		4,295.81
	08052022	eKS/HH Sewer System		1,432.11
	08052022	fOffice/Yard		6,111.74
	08052022	gSpark energy Gas/LP Gas Chgs		81.88
Total for Check Number 55506:				32,697.37
55507	P130	Pacific Gas and Electric-St	07/29/2022	
	08122022	Street Lighting - July		2,411.40
Total for Check Number 55507:				2,411.40
55508	R722	Hunter Rice	07/29/2022	
	1	DWOCP Water Distribution Cert Stipend/HR		350.00
Total for Check Number 55508:				350.00
55509	S119	Sanders Roofing, Inc.	07/29/2022	
	5359 Bal	Bal due/New roof for the District office building		1,200.00
Total for Check Number 55509:				1,200.00
55510	S120	Santander Bank, N.A.	07/29/2022	

Check No	Vendor No Invoice No	Vendor Name Description	Check Date Reference	Check Amount
	2811955	Interest - VacCon		12,054.10
	2811955	Principal - VacCon		105,386.82
Total for Check Number 55510:				117,440.92
55511	S490 113786	SHN Consulting Engineers Elk River Water Main Break	07/29/2022	506.25
Total for Check Number 55511:				506.25
55512	S750 08012022	Standard Insurance Company Short&Long Term Empl Disabilit	07/29/2022	1,578.78
Total for Check Number 55512:				1,578.78
55513	S850 08152022	Suddenlink Internet/07.24.22-08.23.22	07/29/2022	528.13
Total for Check Number 55513:				528.13
55514	T814 1	Jordan Towne 3721 Spring St/Water Damage	07/29/2022	1,041.57
Total for Check Number 55514:				1,041.57
55515	V500 9911708103	Verizon Wireless Cellular Service - July	07/29/2022	330.62
Total for Check Number 55515:				330.62
Total for 7/29/2022:				174,924.58
Report Total (67 checks):				729,338.73

**08/09/22 AGENDA ITEM I.1 CLOSED SESSION**



**ENVIRONMENTAL  
ADVOCATES**

ATTORNEYS AT LAW  
5135 ANZA STREET  
SAN FRANCISCO, CA 94121  
(415) 533-3376  
Fax: (415) 358-5695  
E-mail: [csproul@enviroadvocates.com](mailto:csproul@enviroadvocates.com)

July 29, 2022

*Via Certified Mail, Return Receipt Requested*

Terrence Williams, General Manager  
Humboldt Community Services District  
P.O. Box 158  
Cutten, CA 95534

Re: Sixty-Day Notice of Violations of Clean Water Act and Notice of Intent to File Suit

Dear Mr. Williams,

I am writing on behalf of Ecological Rights Foundation (“EcoRights”) to notify you of serious and ongoing violations of the federal Clean Water Act (“CWA”) by the Humboldt Community Services District’s (“HCSD”) sewage collection system. The purpose of this letter is further to provide notice of EcoRights’ intent to file a civil action against the HCSD sixty days (60) days after the date of this letter.

**I. IDENTITY OF PERSONS GIVING NOTICE AND THEIR COUNSEL**

In accord with 40 C.F.R. section 135.3(b), EcoRights hereby gives notice of the names, addresses, and telephone numbers of the person giving notice, which is EcoRights. EcoRights is a non-profit, public benefit corporation, organized under the laws of the State of California, devoted to furthering the rights of all people to a clean, healthful, and biologically diverse environment. To further its environmental advocacy goals, EcoRights actively seeks federal and state agency implementation of federal and state environmental laws and, as necessary, directly initiates enforcement actions on behalf of itself and its members. EcoRights’ members use the Humboldt Bay, its tributaries, and the ocean waters adjacent thereto for body contact water sports and other forms of recreation, wildlife observation, aesthetic enjoyment, educational

study, and spiritual contemplation. These EcoRights members are concerned about water quality and are and will continue to be adversely affected by HCSD's sewage discharge violations. EcoRights may be contacted at:

James Lamport  
Ecological Rights Foundation  
867 "B" Redwood Drive  
Garberville, California, 95542  
Telephone: (707) 923-4372  
Email: [jimlamport@humboldt.net](mailto:jimlamport@humboldt.net)

EcoRights has retained the following legal counsel to represent it in this matter:

Christopher A. Sproul, Esq.  
Stuart Wilcox, Esq.  
Environmental Advocates  
5135 Anza Street  
San Francisco, California 94121  
Telephone: (415) 533-3376  
Fax: (415) 358-5695  
E-mail: [csproul@enviroadvocates.com](mailto:csproul@enviroadvocates.com), [wilcox@enviroadvocates.com](mailto:wilcox@enviroadvocates.com)

Jason Flanders, Esq.  
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Telephone: (916) 202-3018  
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All communications should be addressed to legal counsel at the above addresses.

## II. FACTUAL BACKGROUND

The HCSD is a public agency formed in 1952 under the provisions of the Community Services Law of the State of California, as amended, with authority under Government Code, Section 6100 *et seq.* See [http://humboldtcsd.org/sites/default/files/2020\\_UWMP.pdf](http://humboldtcsd.org/sites/default/files/2020_UWMP.pdf). The HCSD provides sewer, water, and street lighting services to an area of about 15.4 square miles that surrounds the southerly and easterly boundaries of the City of Eureka ("Eureka"). See *id.* The HCSD has an agreement with Eureka whereby it discharges all its raw sewage into Eureka's collection system for treatment and discharge at Eureka's Elk River Wastewater Treatment Plant ("the WWTP"), thereby making the HCSD what is commonly referred to as a "satellite" collection system. The HCSD owns and operates approximately seventy-eight miles of gravity sewer, eighteen miles of pressure sewer, and twenty-eight pump stations.

Eureka is a municipality incorporated under the laws of the State of California. Eureka owns and operates the WWTP and appurtenant collection system, which collectively is a publicly owned treatment works ("POTW") as defined in CWA section 212(2) and 40 C.F.R.

section 125.58(s). The WWTP discharges treated, partially treated, and untreated sewage to Humboldt Bay receiving waters that is then partially drawn into the Pacific Ocean by the tides.

The CWA prohibits the discharge of pollutants by any person to waters of the United States except in compliance with a permit duly issued under the CWA. CWA § 301(a), 33 U.S.C. § 1311(a). The CWA authorizes the U.S. Environmental Protection Agency (“EPA”), or states with permit programs approved by EPA, to issue National Pollutant Discharge Elimination System (“NPDES”) permits allowing for the discharge of pollutants into waters of the United States. CWA § 402, 33 U.S.C. § 1342

The EPA has approved the State of California’s State Water Resources Control Board (“State Board”) and Regional Water Quality Control Boards to administer a NPDES permit program in California. The California Regional Water Quality Control Board, Region 1 (“the Regional Board”) has issued a NPDES permit to the POTW via Order No. R1-2016-0001 (NPDES Permit No. CA0024449) (“the NPDES Permit”). This permit expired on July 31, 2021, leaving the POTW with no effective NPDES permit.

The HCSD has repeatedly violated the CWA by spilling raw sewage from its collection system in a series of sanitary sewer overflows (“SSOs”). The HCSD has further repeatedly violated the CWA by contributing to wet weather sewage spills from Eureka’s collection system due to excessive rainfall-derived infiltration and inflow (“RDI/I”) in the HCSD sewage collection system. The HCSD has also violated the CWA by contributing to the blending of treated and untreated sewage and its discharge into Humboldt Bay and by contributing to the bypassing of treatment processes and the discharge of raw sewage to Humboldt Bay. The HCSD has violated the CWA by discharging pollutants through Eureka’ to waters of the United States in the absence of a valid permit.

#### **A. The HCSD’s Sewage Spills.**

The HCSD has repeatedly spilled raw sewage from its collection system that carries sewage to the WWTP. Such raw sewage has repeatedly overflowed or spilled from HCSD mainlines, manholes, pump stations, and/or various other equipment/conveyances. A partial list of HCSD’s sewage spills is attached as Attachment 1 to this Notice Letter.<sup>1</sup> The HCSD is liable for civil penalties for all SSOs committed on or after five years before the date of this letter.

These SSOs have been caused by various failures in the HCSD sewage collection system, including (1) lack of capacity to convey wet weather peak flows that are driven in part by excessive rainfall derived infiltration and inflow (which in turn is caused by failure to maintain and repair aging sewer pipes and eliminate sources of rainwater infiltration into the sewer

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<sup>1</sup> Attachment 1 is an abridged print out, omitting certain columns to produce a document with a number of columns that fits on a page. The full CIWQS report of data reported by the HCSD to the State Board and publicly available on CIWQS itemizes the HCSD’s SSOs since 2007. This report is available at this URL:  
<https://ciwqs.waterboards.ca.gov/ciwqs/readOnly/PublicReportSSOServlet?reportAction=criteria>

system), (2) sewer line blockages caused by loading of fats, oil, and grease (“FOG”), debris, and foreign objects into sewer lines and by root intrusion into sewer lines coupled with inadequate sewer line maintenance and cleaning needed to keep sewer lines clear, (3) collapses of aging sewer lines and other aging infrastructure failures, and (4) pump station failures brought on by failure to maintain and upgrade pump stations. These spills have sent raw sewage streaming into drainage channels, Eureka Slough, Ryan Slough, Humboldt Bay, the Pacific Ocean, and tributaries thereto. These spills have repeatedly posed serious public health threats and created severe nuisance in exposing substantial numbers of people to raw sewage. Raw sewage contains a variety of human bacteriological, viral, and parasitic pathogens, and exposure to raw sewage is well known to cause various human illnesses. In addition to human waste, sanitary sewage contains various toxic chemicals from the solvents, detergents, cleansers, inks, pesticides, paints, pharmaceuticals, and other chemicals discarded by households and businesses. Thus, the HCSD’s sewage spills pose serious public health risk in exposing members of the public and EcoRights’ members to sewage-borne pathogens and various toxic pollutants. These persistent, repeated sewage spills also have threatened harm to the sensitive freshwater, estuarine, and marine environments of the Humboldt Bay watershed, as the pathogens and toxic pollutants in sewage can adversely affect freshwater, estuarine, and marine life.

#### **B. The HCSD’s Excess Peak Wet Weather Flow Contributions.**

On information and belief, EcoRights alleges that the HCSD is contributing to wet weather sewage spills from Eureka’s collection system due to excessive RDI/I in the HCSD sewage collection system that in turn is causing sewer flow input from the HCSD into Eureka’s collection system to spike. These high levels, in combination with flows within Eureka’s system, exceed the Eureka system’s carrying capacity thereby leading to unlawful discharges of raw sewage into waters of the U.S. As detailed above, such sewage spills pose a serious public health risk in exposing members of the public and EcoRights’ members to sewage-borne pathogens and various toxic pollutants. A partial list of these SSOs in the Eureka system is attached as Attachment 2 to this Notice Letter.<sup>2</sup>

#### **C. The HCSD’s Contributions to Bypassing and/or Blending at the WWTP.**

On information and belief, EcoRights alleges that the HCSD is discharging excessive peak wet weather flow into Eureka’s collection system that in turn has further caused or contributed to Eureka’s bypassing or blending sewage in its WWTP discharges. It is well established that peak wet weather sewage flows into Eureka’s sewer system have overwhelmed the WWTP’s capacity to provide full secondary treatment before discharging sewage to Humboldt Bay. This capacity shortfall has prompted Eureka to bypass some or all of its

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<sup>2</sup> Attachment 2 to this letter is an abridged print out, omitting certain columns to produce a document with a number of columns that fits on a page. The full CIWQS report of data reported by Eureka to the State Board and publicly available on CIWQS itemizes the City of Eureka's SSOs since 2008. This report is available at this URL:  
[https://ciwqs.waterboards.ca.gov/ciwqs/readOnly/PublicReportSSOServlet?OWASP\\_CSR\\_FTOKEN=P372-Y5MG-MLZM-FB5A-YD2T-K6CL-0XHN-L7HI](https://ciwqs.waterboards.ca.gov/ciwqs/readOnly/PublicReportSSOServlet?OWASP_CSR_FTOKEN=P372-Y5MG-MLZM-FB5A-YD2T-K6CL-0XHN-L7HI).

treatment processes at the WWTP and to discharge that bypassed sewage or to blend primary or even raw sewage into treated effluent and discharge only partially treated sewage to Humboldt Bay. This blending practice plainly violates the NPDES Permit and has led to repeated discharges of inadequately treated sewage with levels of pollutants that exceed limits in the NPDES Permit and that risk harm to human health and the environment. Notably, WWTP discharges have repeatedly violated the NPDES Permit's limits on the allowable levels of fecal coliform, ammonia (as N), cyanide, and settleable solids. This is particularly problematic because the Humboldt Bay waters near the WWTP's outfall discharge are used for water contact recreation, including surfing at the beach known as "Stinky's." On information and belief, EcoRights alleges that the HCSD is contributing to this problem by contributing significant increases in wet weather flow to Eureka's collection system due to excessive RDI/I in the HCSD system. As detailed above, such sewage spills pose a serious public health risk in exposing members of the public and EcoRights' members to sewage-borne pathogens and various toxic pollutants. A partial list of these bypass or blending events is attached as Attachment 3 to this Notice Letter.

#### **D. The HCSD's Unpermitted Discharge.**

The POTW's NPDES Permit, under which the HCSD discharges its sewage to Humboldt Bay, expired on July 31, 2021, leaving the POTW with no effective NPDES permit. As a result, by discharging sewage through the POTW, the HCSD is discharging that sewage in the absence of a valid NPDES Permit. In the alternative, even if the NPDES Permit were still in effect, the WWTP discharges have exceeded the NPDES Permit's effluent limitations on many occasions. The HCSD's contribution to these CWA violations constitute HCSD CWA violations.

### **III. VIOLATIONS OF THE CLEAN WATER ACT**

#### **A. Sewage Spills in Violation of CWA Section 301(a)'s Prohibition on Unpermitted Discharges to Waters of the United States**

As noted above, the HCSD has repeatedly spilled raw sewage from its sewage collection system by SSOs. On information and belief, in addition to SSOs, the HCSD has also discharged sewage from its collection system via exfiltration from its collection system and other spill causes (collectively with SSOs "sewage spills"). At least some of these sewage spills have flowed into waters of the United States. The HCSD does not and could not have NPDES permit authorization to discharge raw sewage from its collection system to waters of the United States, which include Humboldt Bay; the Pacific Ocean; all wetlands adjacent to Humboldt Bay and the Pacific Ocean; freshwater streams and other waters and drainage channels that are tributary to Humboldt Bay and the Pacific Ocean, including but not limited to Eureka Slough, Ryan Slough, and any wetlands adjacent to such tributaries. All such sewage spills have thus constituted the unauthorized discharge of pollutants in violation of CWA section 301(a), which expressly provides:

Except as in compliance with this section and sections . . . 1342 [which provides for NPDES permit authorization for pollutant discharges] . . . the discharge of any pollutant by any person shall be unlawful.

33 U.S.C. § 1311(a). As a result, the HCSD's sewage spills are all violations of the CWA that EcoRights seeks to address through this notice letter.

**B. The HCSD's Contributions to Excess Peak Wet Weather Flows to Eureka's Collection System in Violation of CWA Section 301(a)'s Prohibition on Unpermitted Discharges to Waters of the United States**

On information and belief, the HCSD is contributing excess peak wet weather flow into Eureka's collection system due to excessive RDI/I in the HCSD's own system that in turn has caused or contributed to unlawful discharges in the form of raw sewage SSOs from the Eureka collection system, many of which have caused raw sewage to flow into waters of the U.S. The NPDES Permit only authorizes the discharge of treated sewage at the WWTP outfall. The NPDES Permit, Discharge Prohibition III.E. prohibits "the discharge of untreated or partially treated waste (receiving a lower level of treatment than secondary treatment...) from anywhere within the collection, treatment, or disposal systems..." Further, the NPDES Permit, Discharge Prohibition III.F. prohibits "[a]ny [SSO] that results in a discharge of untreated or partially treated wastewater to (a) waters of the state or (b) land that creates pollution, contamination, or nuisance, as defined in Water Code section 13050..." Therefore, HCSD's contributions to these SSOs, which cause untreated sewage to be discharged to waters of the state and waters of the United States, cause sewage to be discharged at a place other than the WWTP outfall, and which cause nuisance, are in violation of CWA section 301(a)'s prohibition on unpermitted discharges.

**C. The HCSD's Contributions to Bypassing and/or Blending at the WWTP in Violation of the NPDES Permit**

On information and belief, the HCSD has and continues to discharge excessive peak wet weather flow into Eureka's collection system, which is causing or contributing to Eureka violating its NPDES Permit effluent pollution concentration limits and the NPDES Permit's prohibitions on blending and bypassing sewage from the WWTP. Therefore, the HCSD is also liable for these violations of the NPDES Permit.

The NPDES Permit states, "[a]lthough the Regional Water Board has authorized bypass at the Facility in past Orders dating back to 1984, this Order recognizes that ebb tide currents in North Bay and entrance channels of Humboldt Bay are not sufficient in strength to carry effluent discharges out of Humboldt Bay and prohibits discharges to Humboldt Bay that do not receive full biological secondary treatment." NPDES Permit, Attachment F, Facility Description, II.C.2.

Elimination of bypass conditions is necessary for the protection of Humboldt Bay because: (1) Humboldt Bay is an enclosed bay subject to the Enclosed Bays and Estuaries Policy; (2) The Enclosed Bays and Estuaries Policy allows wastewater discharges to enclosed bays 'only when the Regional Board finds that the wastewater in question would consistently be treated and discharged in such a manner that it would enhance the

quality of the receiving waters above that which would occur in the absence of the discharge'; (3) the Enclosed Bays and Estuaries Policy prohibits the discharge or by-passing of untreated wastes; (4) Humboldt Bay hosts the largest oyster production area in the country; and (5) oysters are filter feeders and subject to bioaccumulation of toxics and pathogens that may be present at higher levels in effluent that does not receive full treatment."

NPDES Permit, Attachment F, II.C.2.; *see also* NPDES Permit, Attachment F, Discharge Prohibition III.E. ("Chapter III, section 7 of the [Enclosed] Bays and Estuaries Policy states, 'The discharge or by-passing of untreated waste to bays and estuaries shall be prohibited.' The current operations at the Facility include the intentional diversions around the secondary treatment portion of the treatment facility (including the trickling filters, solids contact, and secondary clarification units). Further, these intentional diversions are not for the essential maintenance of the treatment facility, but instead are used to manage peak hydraulic flows to the Facility.") (emphasis in original); NPDES Permit, Attachment F, Discharge Prohibition III.E. ("this Order discontinues the exception granting bypass of peak wet weather flows above 12 [million gallons per day] when recombined with secondary treatment flows and discharge. It is recognized that the Permittee will be in immediate noncompliance with this prohibition, and as a result discharges from the Facility during times of peak flow when blending occurs will be managed outside of this Order."). As a result, all instances of blending and/or bypass at the WWTP to which HCSD contributed are in violation of the Enclosed Bays and Estuaries Policy, the NPDES Permit, and the CWA. Thus HCSD is in violation of the CWA for these blending and bypass incidents.

#### **D. Unpermitted Discharges**

The NPDES Permit, by its own terms, expired on July 31, 2021. As a result, the HCSD is vicariously discharging pollutants without a permit through Eureka's WWTP, which is *per se* a violation of the CWA without regard to amounts. *See* CWA § 301(a), 33 U.S.C. § 1311(a). The HCSD may contend that the NPDES Permit has been administratively extended pursuant to 40 C.F.R. section 122.6 or comparable provision of California law, but any such claims would be erroneous for two reasons:

1. The CWA specifies that NPDES permits can be issued *only* for fixed terms not to exceed five years. CWA § 402(b)(1)(B), (a)(3) (33 U.S.C. § 1342(b)(1)(B), (a)(3)). To the extent that 40 C.F.R. section 122.6 contradicts this plain and unambiguous meaning of the CWA, it is *ultra vires*. In addition, no provision of state law can override this unequivocal federal law mandate. Accordingly, neither EPA nor California can extend the term of an NPDES permit beyond five years.
2. 40 C.F.R. section 122.6 requires submittal of a timely and complete individual application that meets all of the requirements of 40 C.F.R. section 122.21 before an expired permit may be extended. On information and belief, Eureka has not submitted such application for renewal of the NPDES Permit. Consequently, every day that the HCSD routes sewage, which contains pollutants, to the WWTP,

which in turn discharges that pollutant-containing sewage, the HCSD is discharging a pollutant without NPDES permit authorization in violation of CWA section 301(a), 33 U.S.C. § 1311(a), on this ground as well.

Consequently, every day that the HCSD routes sewage, which contains pollutants, to the WWTP, which in turn discharges that pollutant-containing sewage to Humboldt Bay, the HCSD is discharging a pollutant without NPDES permit authorization in violation of CWA section 301(a), 33 U.S.C. § 1311(a). In the alternative, all times where discharge from the WWTP had pollutant concentrations that exceeded the NPDES Permit's effluent limitations, HCSD's contribution to those CWA violations constitute HCSD CWA violations as well.

#### **E. Dates and Locations of Violations**

A partial list of the HCSD's SSOs, provided by way of example, is set forth as Attachment 1 to this letter. This partial list indicates the date and location of these SSOs and identifies whether these SSOs entered waters of the United States. As noted, these above-described spills are illustrative of the types of sewage spills from the HCSD's sewage collection system. On information and belief, EcoRights has concluded that the HCSD has had additional sewage spills in the past five years. The dates and locations of, and all other pertinent details concerning the HCSD's sewage spills are well known to the HCSD, as the HCSD is required to monitor and report these spills to the State Board pursuant to the Statewide General Waste Discharge Requirement ("WDR") for Wastewater Collection Agencies, State Water Resources Control Board Order No. 2006-0003- DWQ; to the Regional Board; and to the California Office of Emergency Services ("OES"). *See* Cal. Water Code §§ 13193(c), 13271; NPDES Permit, Standard Provisions, § VI.C.5.a.i, Attachment E § E. Each of these spills that has caused pollutants to flow into waters of the United States constitutes a separate violation of CWA section 301(a), and all of these spills to land that have caused nuisance are violations of the NPDES Permit.

A partial list of wet weather sewage spills from Eureka's collection system to which the HCSD contributed is set forth as Attachment 2 to this letter. The dates and all other pertinent details concerning HCSD's contributions to sewage spills from Eureka's collection system are well known to HCSD.

A partial list of bypassing or blending events to which the HCSD contributed is set forth as Attachment 3 to this letter and in the following dates, some of which are reflected in Attachment 3: 1/3/17, 1/10/17, 1/11/17, 1/18/17-1/22/17, 2/9/17, 2/10/17, 2/16/17, 2/17/17, 2/19/17, 2/22/17, 2/23/17, 3/24/17, 1/24/18, 1/25/18, 3/16/18, 3/23/18, 3/24/18, 3/25/18, 1/19/19, 1/20/19, 2/15/19, 2/16/19, 2/24/19-3/1/19, and/or 3/6/1. The dates and all other pertinent details concerning HCSD's contributions to Eureka's blending/bypass events at the WWTP are well known to HCSD.

The dates, locations of, and all other pertinent details concerning the unpermitted discharges to Eureka's WWTP since the NPDES permit expired on July 31, 2021 are well known to the HCSD, which, on information and belief, included every day since the date of the NPDES Permit's expiration. However, even if the NPDES Permit had not expired, the WWTP has

discharged effluent with pollutant concentrations in excess of the NPDES Permit's limits, which the HCSD's sewage contributed to, on many occasions. A partial list of exceedances are set forth in Attachment 4 to this letter. The dates and all other pertinent details concerning HCSD's contributions to the WWTP's pollutant limit exceedances are well known to HCSD.

EcoRights will include in its suit against the HCSD claims for additional violations when additional information becomes available. The HCSD has taken inadequate affirmative steps to eliminate its sewage spills, prevent wet weather contributions to Eureka's sewage spills, prevent contributions to bypassing and/or blending events, obtain NPDES permit coverage for its discharges, and comply with NPDES Permit pollutant discharge limitations. As a result, these violations are ongoing and will continue in the future.

#### **IV. NOTICE OF INTENT TO SUE THE HCSD FOR VIOLATIONS OF THE CLEAN WATER ACT**

EcoRights contends that HCSD has failed in the respects set forth above to comply with the requirements imposed by CWA section 301(a) and the NPDES Permit. CWA section 505(b), 33 U.S.C. § 1365(b), requires that sixty (60) days prior to the initiation of a civil action under CWA section 505(a), a citizen must give notice of their intention to sue. 40 C.F.R. section 135.2 provides that, if the alleged violator is a State or local agency, service of notice shall be accomplished by certified mail addressed to, or by personal service upon, the head of such agency. This section further provides that a copy of the notice shall be mailed to the chief administrative officer of the water pollution control agency for the State in which the violation is alleged to have occurred, the EPA Administrator, and the EPA Regional Administrator for the EPA Region in which such violation is alleged to have occurred. Accordingly, this notice is being sent to you as the General Manager of HCSD. We are also sending copies to the EPA Administrator, the Regional Administrator of EPA Region 9, the Executive Director of the State Board, and the Executive Director of the Regional Board (and a courtesy copy to the U.S. Department of Justice).

By this letter, pursuant to CWA section 505(a) and (b), 33 U.S.C. § 1365(a) and (b), EcoRights hereby puts you on notice that after the expiration of sixty (60) days from the date of this Notice of Intent To File Suit, EcoRights intends to file an enforcement action in federal court against the HCSD for the latter's CWA violations.

EcoRights intends to seek civil penalties and, in addition, injunctive relief preventing further CWA violations pursuant to CWA sections 505(a) and (d), 33 U.S.C. § 1365(a) and (d), and such other relief as is permitted by law. Pursuant to Section 309(d) of the Clean Water Act, 33 U.S.C. § 1319(d), and the Adjustment of Civil Monetary Penalties for Inflation, 40 C.F.R. § 19.4, each separate violation of the CWA subjects the violator to a penalty for all violations occurring during the period commencing five (5) years prior to the date of a notice of intent to file suit letter. Pursuant to § 309(d) of the CWA, 33 U.S.C. § 1319(d), and the Adjustment of Civil Monetary Penalties for Inflation, 40 C.F.R. § 19.4, each separate violation of the CWA subjects the violator of a penalty of up to \$59,973 per day per violation for penalties assessed on or after January 12, 2022. Lastly, pursuant to Section 505(d) of the Clean Water Act, 33 U.S.C.

§1365(d), EcoRights will seek to recover its costs, including attorneys' and experts' fees, associated with this enforcement action.

In addition to the violations set forth above, this notice covers all ongoing CWA violations and violations evidenced by information that becomes available to EcoRights after the date of this Notice of Intent to File Suit.

**V. THE HCSD IS A POTENTIALLY NECESSARY AND/OR INDISPENSABLE PARTY IN ECORIGHTS' CASE AGAINST EUREKA**

Pursuant to Federal Rule of Civil Procedure ("FRCP") 19, EcoRights intends to seek joinder of the HCSD in EcoRight's ongoing case filed March 8, 2022 against the City of Eureka, *Ecological Rights Foundation v. City of Eureka*, No. 22-cv-01459-JST (N.D. Cal.), for sewage spills from Eureka's sewage collection system and problematic discharges of sewage from the WWTP. FRCP 19(a)(1)(A) requires that a party be joined when "in that person's absence, the court cannot accord complete relief among existing parties." The remedy sought by EcoRights may affect the HCSD and/or may require the HCSD's participation to effectuate because Eureka may be unable to resolve its SSO's, blending or bypass discharges, and/or NPDES Permit effluent limitation exceedances without the HCSD, *inter alia*, curtailing its excessive RDI/I and/or helping to finance and/or facilitate needed POTW improvements.

EcoRights is interested in discussing effective remedies for the violations noted in this letter. If you wish to pursue such discussions in the absence of further litigation, we suggest that you initiate those discussions within the next 20 days so that they may be completed before the end of the 60-day notice period. Although EcoRights is always interested in avoiding unnecessary litigation, it does not intend to delay the filing of a complaint in federal court if discussions are continuing when the notice period ends.

Sincerely,  
/s/ Christopher Sproul  
Christopher Sproul  
Environmental Advocates  
Counsel for Ecological Rights Foundation

cc: *Via Certified Mail (Return Receipt Requested)*

Michael Regan, Administrator U.S. Environmental Protection Agency U.S. EPA Headquarters William Jefferson Clinton Building 1200 Pennsylvania Avenue, N.W. Mail Code: 1101A Washington, DC 20460	Merrick Garland, U.S. Attorney General U.S. Department of Justice 950 Pennsylvania Avenue, NW Washington, DC 20530-0001
Martha Guzman, Acting Regional Administrator U.S. Environmental Protection Agency Region IX 75 Hawthorne Street	Eileen Sobeck Executive Director California State Water Resources Control Board P.O. Box 100 Sacramento, CA 95812-0100

Mail Code: ORA-1 San Francisco, CA 94105	
Gregory Giusti, Chair State of California North Coast Regional Water Quality Control Board (Region 1) 5550 Skylane Blvd., Suite A Santa Rosa, CA 95403	

## Attachment 1

AGENCY	CERT_DT	SPILL_TYPE	SPILL_LOC_NAME	SPILL_LOC_DESC	APPEAR_PT	REACH_SURFACE	REACH_STORM_DRAINPIPE	RETURN_TO_SSS	FINAL_SPILL_DEST	SPILL_VOL	SPILL_VOL_REACH_SURFACE	START_DT	SPILL_CAUSE	SURFACE_WATER_IMPACT
Humboldt CSD	2007.07.25	Category 3	Loma Drive	null	Manhole	No	No	Not Applicable - Spill did not reach storm drainpipe	Other (specify below)	600	0	2007.06.18 11.00.00	Debris	
Humboldt CSD	2011.01.12	Category 3	Bar View Ct.	This spill report was started by a previous General Manager. I have completed and certified the report to the best of my ability based on research I have done.	Building or structure; Gravity sewer; Manhole	No	No	Not Applicable - Spill did not reach a separate storm drainpipe	Building or structure; Street/curb and gutter	500	0	2007.06.26 11.00.00	Pipe structural problem/failure	N/A
Humboldt CSD	2007.10.11	Category 3	Union and Sea Ave.	null	Force main or pressure sewer	No	No	Not Applicable - Spill did not reach storm drainpipe	Other paved surface	100	0	2007.09.07 11.00.00	Pipe structural problem/failure	

AGENCY	CERT_DT	SPILL_TYPE	SPILL_LOC_NAME	SPILL_LOC_DESC	APPEAR_PT	REACH_SURFACE	REACH_STORM_DRAINPIPE	RETURN_TO_SSS	FINAL_SPILL_DEST	SPILL_VOL	SPILL_VOL_REACH_SURF	START_DT	SPILL_CAUSE	SURFACE_WATER_IMPACT
Humboldt CSD	2010.12.20	Category 3	Meyers Ave	null	Manhole	No	No	Not Applicable - Spill did not reach storm drainpipe	Street/curb and gutter	750	0	2007.12.04 07.20.00	Pipe structural problem/failure	
Humboldt CSD	2008.04.01	Category 1	End of Moore Ave.	null	Force main or pressure sewer	Yes	Yes	No	Storm drain	2255	2255	2008.03.14 14.00.00	Pipe structural problem/failure	NA
Humboldt CSD	2008.09.15	Category 1	Fst. sewer lift station	null	Pump station	Yes	Yes	No	Other (specify below)	50	50	2008.08.30 23.40.00	Other (specify below)	Humboldt Bay Entrance
Humboldt CSD	2010.12.20	Category 3	2818 Harris Street	null	Gravity sewer	No	No	Not Applicable - Spill did not reach storm drainpipe	Street/curb and gutter	50	0	2009.07.02 09.50.00	Debris-General	
Humboldt CSD	2010.12.02	Category 1	Intersection of Home Drive and Christopher	null	Manhole	Yes	Yes	No	Other (specify below)	50	50	2009.09.28 07.40.00	Grease deposition (FOG)	N/A

AGENCY	CERT_DT	SPILL_TYPE	SPILL_LOC_NAME	SPILL_LOC_DESC	APPEAR_PT	REACH_SURFACE	REACH_STORM_DRAINPIPE	RETURN_TO_SSS	FINAL_SPILL_DEST	SPILL_VOL	SPILL_VOL_REACH_SURF	START_DT	SPILL_CAUSE	SURFACE_WATER_IMPACT
Humboldt CSD	2010.12.20	Category 3	Union Street & Sea Avenue	null	Force main or pressure sewer	No	No	Not Applicable - Spill did not reach a separate storm drainpipe	Other (specify below)	425	0	2009.11.30 12.30.00	Pipe structural problem/failure	N/A
Humboldt CSD	2010.01.15	Category 1	Campton Road & Fern Street	null	Manhole; Pump station	Yes	Yes	No	Storm drain	50	50	2010.01.09 19.00.00	Other (specify below)	Elk River Drainage
Humboldt CSD	2011.06.20	Category 3	Baily Street sewer lift station	null	Manhole; Pump station	No	No	Not Applicable - Spill did not reach a separate storm drainpipe	Other (specify below)	300	0	2011.06.19 08.50.00	Pump station failure	None
Humboldt CSD	2012.01.25 00.00.00	Category 1	End of North Street	null	Gravity sewer; Manhole	Yes	No	Not Applicable - Spill did not reach a separate storm drainpipe	Surface water	2400	2400	2012.01.21 09.40.00	Debris-General	North Humboldt Bay / Ocean

AGENCY	CERT_DT	SPILL_TYPE	SPILL_LOC_NAME	SPILL_LOC_DESC	APPEAR_PT	REACH_SURFACE	REACH_STORM_DRAINPIPE	RETURN_TO_SSS	FINAL_SPILL_DEST	SPILL_VOL	SPILL_VOL_REACH_SURFACE	START_DT	SPILL_CAUSE	SURFACE_WATER_IMPACT
Humboldt CSD	2012.04.16 00.00.00	Category 2	End of London Drive	Heavily wooded and vegetated area at the end of London Drive.	Gravity sewer; Manhole	No	No	Not Applicable - Spill did not reach a separate storm drainpipe	Other (specify below)	2600	0	2012.04.15 11.50.00	Grease deposition (FOG)	N/A
Humboldt CSD	2013.03.11	Category 3	Wellington Street at Pleasant Street	null	Manhole; Pump station	No	No	Not Applicable - Spill did not reach a separate storm drainpipe	Other (specify below)	45	0	2013.03.10 12.30.00	Other (specify below)	N/A
Humboldt CSD	2013.10.31	Category 3	End of Berry Road	null	Gravity Mainline; Upper Lateral (Private)	No	No	Not Applicable - Spill did not reach a separate storm drainpipe	Unpaved surface	300	0	2013.10.23 13.20.00	Grease Deposition (FOG)	
Humboldt CSD	2014.02.10	Category 1	Wellington Street & Pleasant Street	null	Pump station	Yes	Yes	No	Separate Storm Drain; Surface Water; Unpaved surface	70	30	2014.02.08 10.46.00	Other (specify below)	Ryan Slough which flows into North Humboldt Bay.

AGENCY	CERT_DT	SPILL_TYPE	SPILL_LOC_NAME	SPILL_LOC_DESC	APPEAR_PT	REACH_SURFACE	REACH_STORM_DRAINPIPE	RETURN_TO_SSS	FINAL_SPILL_DEST	SPILL_VOL	SPILL_VOLUME EACH_SURF	START_DT	SPILL_CAUSE	SURFACE_WATER_IMPACT
Humboldt CSD	2014.06.30	Category 1	South Broadway Drive	null	Force Main	Yes	No	Not Applicable - Spill did not reach a separate storm drainpipe	Drainage Channel; Surface Water; Unpaved surface	83200	21000	2014.06.11 09.00.00	Pipe Structural Problem/Failure	South Humboldt Bay
Humboldt CSD	2016.01.14	Category 1	South Broadway Street	null	Manhole	Yes	Yes	No	Other (specify below)	500	450	2015.12.30 11.20.00	Root Intrusion	south Humboldt Bay
Humboldt CSD	2016.01.25	Category 2	Humboldt Hill Road	null	Manhole	No	No	Not Applicable - Spill did not reach a separate storm drainpipe	Unpaved surface	1000	0	2016.01.21 00.20.00	Root Intrusion	
Humboldt CSD	2016.03.28	Category 2	Beechwood Drive SLS	null	Pump station	No	No	Not Applicable - Spill did not reach a separate storm drainpipe	Other (specify below)	8873	0	2016.03.11 10.00.00	Pump Station Failure-Controls	
Humboldt CSD	2016.12.20	Category 1	Crab Street (King Salmon), Eureka, Ca.	null	Manhole	Yes	Yes	No	Surface Water	300	300	2016.12.14 11.50.00	Other (specify below)	South Humboldt Bay

AGENCY	CERT_DT	SPILL_TYPE	SPILL_LOC_NAME	SPILL_LOC_DESC	APPEAR_PT	REACH_SURFACE	REACH_STORM_DRAINPIPE	RETURN_TO_SSS	FINAL_SPILL_DEST	SPILL_VOL	SPILL_VOL_REACH_SURF	START_DT	SPILL_CAUSE	SURFACE_WATER_IMPACT
Humboldt CSD	2017.02.08	Category 1	End of Edgewood Road	null	Pump station	Yes	Yes	No	Surface Water	90	80	2017.02.07 10.35.00	Grease Deposition (FOG)	Freshwater Slough which flows into Eureka Slough which flows into North Humboldt Bay
Humboldt CSD	2017.02.23	Category 1	End of Hoover Street, Eureka, Ca. 95501	null	Manhole	Yes	No	Not Applicable - Spill did not reach a separate storm drainpipe	Surface Water	750	750	2017.02.21 09.05.00	Pump Station Failure-Mechanical	Eureka Slough, North Humboldt Bay
Humboldt CSD	2017.10.12	Category 1	End of North Street, Eureka, Ca 95501	Manhole in wooded area which has a drainage channel which flows to North Humboldt Bay	Gravity Mainline; Manhole	Yes	No	Not Applicable - Spill did not reach a separate storm drainpipe	Drainage Channel; Surface Water	2400	2400	2017.10.11 09.42.00	Grease Deposition (FOG)	North Humboldt Bay

AGENCY	CERT_DT	SPILL_TYPE	SPILL_LOC_NAME	SPILL_LOC_DESC	APPEAR_PT	REACH_SURFACE	REACH_STORM_DRAINPIPE	RETURN_TO_SSS	FINAL_SPILL_DEST	SPILL_VOL	SPILL_VOL_REACHED_SURFACE	START_DT	SPILL_CAUSE	SURFACE_WATER_IMPACT
Humboldt CSD	2018.12.17	Category 2	Bailey Street SLS	null	Pump station	No	No	Not Applicable - Spill did not reach a separate storm drainpipe	Other (specify below)	6250	0	2018.12.16 12.55.00	Pump Station Failure-Power	
Humboldt CSD	2019.03.05	Category 1	End of Hoover Street	null	Gravity Mainline; Manhole; Pump station	Yes	No	Not Applicable - Spill did not reach a separate storm drainpipe	Drainage Channel; Other (specify below); Surface Water; Unpaved surface	9750	9750	2019.02.25 07.41.00	Pump Station Failure-Mechanical	Eureka Slough which feeds into North Humboldt Bay
Humboldt CSD	2019.03.05	Category 1	End of North Street	null	Gravity Mainline; Manhole	Yes	No	Not Applicable - Spill did not reach a separate storm drainpipe	Drainage Channel; Other (specify below); Surface Water; Unpaved surface	5400	5400	2019.02.27 13.00.00	Other (specify below)	Eureka Slough which flows into North Humboldt Bay

AGENCY	CERT_DT	SPILL_TYPE	SPILL_LOC_NAME	SPILL_LOC_DESC	APPEAR_PT	REACH_SURFACE	REACH_STORM_DRAINPIPE	RETURN_TO_SSS	FINAL_SPILL_DEST	SPILL_VOL	SPILL_VOL_REACH_SURFACE	START_DT	SPILL_CAUSE	SURFACE_WATER_IMPACT
Humboldt CSD	2019.04.16	Category 3	Timber Ridge Lane	null	Manhole	No	No	Not Applicable - Spill did not reach a separate storm drainpipe	Unpaved surface	50	0	2019.04.01 09.15.00	Debris-Rags	
Humboldt CSD	2020.04.09	Category 3	Harris Street Sewer Overflow	null	Manhole	No	No	Not Applicable - Spill did not reach a separate storm drainpipe	Other (specify below)	80	0	2020.04.01 11.26.00	Debris-Wipes/Non-Dispersables	
Humboldt CSD	2020.10.07	Category 2	Humboldt Hill Road	null	Manhole	No	No	Not Applicable - Spill did not reach a separate storm drainpipe	Other (specify below)	1500	0	2020.10.04 12.00.00	Root Intrusion	
Humboldt CSD	2021.11.16	Category 3	Burns Drive, Eureka, Ca. 95503	Spill went to a heavily vegetated wooded area which was dry at the time of the spill	Lower Lateral (Public)	No	No	Not Applicable - Spill did not reach a separate storm drainpipe	Other (specify below)	700	0	2021.11.14 09.45.00	Grease Deposition (FOG)	

AGENCY	CERT_DT	SPILL_TYPE	SPILL_LOC_NAME	SPILL_LOC_DESC	APPEAR_PT	REACH_SURFACE	REACH_STORM_DRAINPIPE	RETURN_TO_SSS	FINAL_SPILL_DEST	SPILL_VOL	SPILL_VOLUME_REACHED_SURFACE	START_DT	SPILL_CAUSE	SURFACE_WATER_IMPACT
Humboldt CSD	2022.05.19	Category 2	Bailey St. SLS	null	Pump station	No	No	Not Applicable - Spill did not reach a separate storm drainpipe	Unpaved surface	14775	0	2022.05.16 06.30.00	Pump Station Failure-Mechanical	

ATTACHMENT 2

AGENCY	CERT_DT	SPILL_TYPE	SPILL_LOC_NAME	SPILL_LOC_DESC	APPEAR_PT	REACH_SURFACE	REACH_STORM_DRAINPIPE	RETURN_TO_SSS	FINAL_SPILL_DEST	SPILL_VOL	SPILL_VOL_REACH_SURF	START_DT	SPILL_CAUSE	SURFACE_WATER_IMPACT
Eureka City	2011.01.05	Category 3	O Street Lift Station	O Street Lift Station @ the South end Of J st.	Pump station	No	No	Not Applicable	Other paved surface	800	0	2007.07.02 12.45.00	Pump station failure	
Eureka City	2011.01.05	Category 1	Harrison & Wood Streets	Intersection of Harrison Ave. & Wood Street	Manhole	Yes	Yes	No	Separate storm drain	600	600	2007.08.08 07.25.00	Debris-General	Eureka Slough
Eureka City	2011.01.05	Category 1	O St Lift Station	null	Pump station	Yes	Yes	No	Other paved surface	9000	9000	2008.01.31 12.30.00	Flow Exceeded Capacity (Separate CS Only)	Elk River, Humboldt Bay
Eureka City	2011.01.05	Category 1	Buhne & Rst.	Manhole @ Buhne St. & R St.	Manhole	Yes	Yes	No	Separate storm drain	300	300	2008.01.31 19.30.00	Pipe structural problem/failure	Humboldt Bay
Eureka City	2008.08.12	Category 1	3406 Lowell St.	From S.S. Manhole in the front lawn area of 3406 Lowell St.	Manhole	Yes	No	Not Applicable	Other (specify below)	300	150	2008.08.11 18.00.00	Debris	Martin Slough
Eureka City	2008.08.19	Category 3	Eureka Muni. Golf Course	Access road to Golf Course Lift Station	Manhole	No	No	Not Applicable	Unpaved surface	200	0	2008.08.19 14.30.00	Pump station failure	

AGENCY	CERT_DT	SPILL_TYPE	SPILL_LOC_NAME	SPILL_LOC_DESC	APPEAR_PT	REACH_SURFACE	REACH_STORM_DRAINPIPE	RETURN_TO_SSS	FINAL_SPILL_DEPTH	SPILL_VOLUME	SPILL_VOLUME_EACH_SURFACE	START_DT	SPILL_CAUSE	SURFACE_WATER_IMPACT
Eureka City	2009.02.18	Category 3	Mauer Marsh	null	Force main or pressure sewer	No	No	Not Applicable Spill did not reach storm drainpipe	Unpaved surface	100	0	2009.02.18 09.45.00	Pipe structural problem/failure	
Eureka City	2009.06.26	Category 3	Manhole On Vista Dr. Eureka Ca. 95501	null	Manhole	No	Yes	Yes	Storm drain	15	0	2009.06.20 11.48.00	Root Intrusion	
Eureka City	2009.06.26	Category 3	Manhole On Huntoon St	null	Manhole	No	Yes	Yes	Street/curb and gutter	720	0	2009.06.25 14.00.00	Debris-General	
Eureka City	2009.08.06	Category 1	Waterfront Drive Lift Station	Spill occurred at street edge by lift station	Force main or pressure sewer	Yes	Yes	No	Surface water	900	900	2009.08.05 07.30.00	Pipe structural problem/failure	Humboldt Bay

AGENCY	CERT_DT	SPILL_TYPE	SPILL_LOC_NAME	SPILL_LOC_DESC	APPEAR_PT	REACH_SURFACE	REACH_STORM_DRAINPIPE	RETURN_TO_SSS	FINAL_SPILL_DEPTH	SPILL_VOLUME	SPILL_VOLUME_REACHED_SURFACE	START_DT	SPILL_CAUSE	SURFACE_WATER_IMPACT
Eureka City	2009.10.12	Category 1	Ost & Hemlock	Manhole on Ost St.	Manhole	Yes	Yes	No	Other (specify below)	180	180	2009.10.09 15.30.00	Root Intrusion	Martian Slough
Eureka City	2009.12.10	Category 3	1091 Vista Dr	Spill out of manhole	Gravity sewer	No	No	Not Applicable Spill did not reach storm drainpipe	Unpaved surface	100	0	2009.12.06 16.30.00	Root Intrusion	
Eureka City	2010.06.25	Category 1	West End of Madrone St.	In open field West from the West end of Madrone St.	Force main or pressure sewer	Yes	No	Not Applicable Spill did not reach storm drainpipe	Unpaved surface	1700	1700	2010.06.24 15.45.00	Pipe structural problem/failure	Martin Slough
Eureka City	2010.10.14	Category 1	Manhole @ 2nd. & L st.	null	Gravity sewer	Yes	Yes	Yes	Other (specify below)	20	20	2010.10.14 08.05.00	Debris-General	100% recoverd

AGENCY	CERT_DT	SPILL_TYPE	SPILL_LOC_NAME	SPILL_LOC_DESC	APPEAR_PT	REACH_SURFACE	REACH_STORM_DRAINPIPE	RETURN_TO_SSS	FINAL_SPILL_DEST	SPILL_VOL	SPILL_VOL_REACH_SURF	START_DT	SPILL_CAUSE	SURFACE_WATER_IMPACT
Eureka City	2010.11.15	Category 1	Waterfront Dr.	Manhole on Waterfront Drive	Manhole	Yes	Yes	No	Surface water	400	400	2010.11.14 09.00.00	Pump station failure	Humboldt Bay
Eureka City	2010.12.16	Category 1	Harrison & Wood st.	Manhole @ the intresection of Harrison & Wood st	Manhole	Yes	Yes	No	Separate storm drain	250	250	2010.12.16 08.20.00	Debris-General	un-named drainage ditch, that flows to the East of
Eureka City	2011.04.29	Category 1	West Simpson St.	Manhole on W. Simpson	Gravity sewer	Yes	Yes	No	Street/curb and gutter	200	150	2011.04.28 16.05.00	Root Intrusion	Humboldt Bay
Eureka City	2011.11.21	Category 1	1700 Blk. of Madrone St.	null	Force main or pressure sewer	Yes	No	Not Applicable	Surface water	520	320	2011.05.06 13.30.00	Pipe structural problem/failure	Martin Slough
Eureka City	2011.07.15	Category 3	Truesdale	Manhole	Gravity sewer	No	No	Not Applicable	Unpaved surface	300	0	2011.07.14 13.10.00	Debris-General	none

AGENCY	CERT_DT	SPILL_TYPE	SPILL_LOC_NAME	SPILL_LOC_DESC	APPEAR_PT	REACH_SURFACE	REACH_STORM_DRAINPIPE	RETURN_TO_SSS	FINAL_SPILL_DEPTH	SPILL_VOLUME	SPILL_VOLUME_REACHED_SURFACE	START_DT	SPILL_CAUSE	SURFACE_WATER_IMPACT
Eureka City	2012.02.21	Category 1	from sump pump from 321 I st.	null	Building or structure	Yes	Yes	No	Surface water	2000	1600	2012.02.21 08.00.00	Debris-General	Humboldt Bay
Eureka City	2012.04.04	Category 1	O Street Lift Station	null	Manhole	Yes	Yes	No	Surface water	90000	90000	2012.03.29 18.00.00	Rainfall exceeded design (Separate CS Only)	Martian Slough to Elk River to Humboldt Bay
Eureka City	2012.04.04	Category 1	2nd. & K St.	null	Manhole	Yes	No	Not Applicable - Spill did not reach a separate storm drainpipe	Surface water	4800	4800	2012.03.30 08.00.00	Rainfall exceeded design (Separate CS Only)	Humboldt Bay
Eureka City	2012.04.04	Category 2	Waterfront Dr. & T St.	null	Manhole	No	Yes	No	Surface water	1900	0	2012.03.30 08.00.00	Rainfall exceeded design (Separate CS Only)	Humboldt Bay
Eureka City	2012.04.04	Category 2	Centreal Ave. & Harris St.	null	Manhole	No	Yes	No	Separate storm drain	6600	0	2012.03.31 07.00.00	Rainfall exceeded design (Separate CS Only)	Humboldt Bay

AGENCY	CERT_DT	SPILL_TYPE	SPILL_LOC_NAME	SPILL_LOC_DESC	APPEAR_PT	REACH_SURFACE	REACH_STORM_DRAINPIPE	RETURN_TO_SSS	FINAL_SPILL_DEST	SPILL_VOLUME	SPILL_VOLUME_REACHED_SURFACE	START_DT	SPILL_CAUSE	SURFACE_WATER_IMPACT
Eureka City	2012.12.05	Category 1	O Street Lift Station	null	Force main or pressure sewer	Yes	No	Not Applicable - Spill did not reach a separate storm drainpipe	Surface water	16800	16800	2012.12.02 04.00.00	Rainfall exceeded design (Separate CS Only)	Martin Slought to Elk River To Humboldt Bay
Eureka City	2013.10.24	Category 1	McFarland Ave. Eureka, Ca 95501	From Manhole on McFarland Ave.	Gravity Mainline	Yes	Yes	No	Combined Storm Drain (Combined CS only); Drain	104	48	2013.10.24 08.22.00	Debris-General	
Eureka City	2014.01.14	Category 1	2926 California	we were made aware of a spill in the Alley behind 2926 California St.	Lateral Clean Out (Private)	Yes	Yes	No	Paved Surface	20	15	2014.01.10 14.40.00	Debris from Lateral	
Eureka City	2014.02.06	Category 3	G St. & Everding St.	from Clean out on Main that runs North - South on G St.	Manhole	No	No	Not Applicable - Spill did not reach a separate storm drainpipe	Paved Surface	50	0	2014.02.06 16.14.00	Debris-General	
Eureka City	2014.02.10	Category 1	O Street Lift Station (Manhole)	from a manhole outside of our Ost5. Lift Station	Gravity Mainline	Yes	No	Not Applicable - Spill did not reach a separate storm drainpipe	Unpaved surface	600	400	2014.02.10 11.10.00	Debris-General	Martin Slought, to Elk River to Humboldt Bay

AGENCY	CERT_DT	SPILL_TYPE	SPILL_LOC_NAME	SPILL_LOC_DESC	APPEAR_PT	REACH_SURFACE	REACH_STORM_DRAINPIPE	RETURN_TO_SSS	FINAL_SPILL_DEPTH	SPILL_VOL	SPILL_VOLUME_REACH_SURFACE	START_DT	SPILL_CAUSE	SURFACE_WATER_IMPACT
Eureka City	2014.04.11	Category 1	3300 Block of Coattage	Manhole on 3300 Block of Coattage, Eureka, Ca.	Gravity Mainline	Yes	Yes	No	Separate Storm Drain	7525	4925	2014.04.11 06.00.00	Debris-General	Humboldt Bay
Eureka City	2014.09.23	Category 1	behind 3541 O Street	from MH behind 3541 Ost.	Manhole	Yes	No	Not Applicable - Spill did not reach a separate storm drainpipe	Surface Water;Unpaved surface	900	450	2014.09.23 08.10.00	Root Intrusion	Martian Slough
Eureka City	2014.10.21	Category 1	Muni Golf Course	Manhole	Gravity Mainline; Manhole	Yes	No	Not Applicable - Spill did not reach a separate storm drainpipe	Surface Water	90	90	2014.10.04 11.43.00	Debris from Construction	Martian Slough;rought to Elk River to Humboldt Bay

AGENCY	CERT_DT	SPILL_TYPE	SPILL_LOC_NAME	SPILL_LOC_DESC	APPEAR_PT	REACH_SURFACE	REACH_STORM_DRAINPIPE	RETURN_TO_SSS	FINAL_SPILL_DEST	SPILL_VOL	SPILL_VOL_REACH_SURF	START_DT	SPILL_CAUSE	SURFACE_WATER_IMPACT
Eureka City	2014.10.22	Category 1	1625 G Street	null	Gravity Mainline; Lower Lateral (Private)	Yes	No	Not Applicable	Paved Surface; Separate Storm Drain	500	500	2014.10.21 21.30.00	Debris-Rags	Clark Slough to Humboldt Bay
Eureka City	2015.02.10	Category 1	manhole in front of 3568 H Street	from manhole in front of 3568 H Street	Manhole	Yes	Yes	No	Separate Storm Drain	5000	5000	2014.12.21 08.55.00	Grease Deposition (FOG)	Martian Slough, Elk River, Humboldt Bay
Eureka City	2015.07.29	Category 1	5th and D	Man hole on 5th and D	Gravity Mainline	Yes	Yes	No	Separate Storm Drain	100	50	2015.07.28 18.30.00	Debris-General	Storm drain to Humboldt bay
Eureka City	2016.01.05	Category 1	515 W. Del Norte	null	Inside Building or Structure	Yes	Yes	No	Separate Storm Drain; Street/Curb and Gutter	900	900	2015.12.26 01.30.00	Debris-Rags	Humboldt Bay
Eureka City	2016.10.04	Category 3	2201 Garland Street. Eureka, CA	null	Inside Building or Structure; Manhole	No	No	Not Applicable	Building or Structure; Paved Surface	100	0	2016.10.03 08.50.00	Grease Deposition (FOG)	

AGENCY	CERT_DT	SPILL_TYPE	SPILL_LOC_NAME	SPILL_LOC_DESC	APPEAR_PT	REACH_SURFACE	REACH_STORM_DRAINPIPE	RETURN_TO_SSS	FINAL_SPILL_DEST	SPILL_VOLUME	SPILL_VOLUME_REACHED_SURFACE	START_DT	SPILL_CAUSE	SURFACE_WATER_IMPACT
Eureka City	2017.03.06	Category 1	2nd & K St	null	Manhole	Yes	No	Not Applicable	Paved Surface; Separate Storm Drain; Street/Curb	215	195	2016.12.15 03.35.00	Rainfall Exceeded Design, I and I (Separate CS Only)	Humboldt Bay
Eureka City	2022.02.08	Category 1	839 West Harris St.	null	Lateral Clean Out (Private)	Yes	Yes	No	Paved Surface; Separate Storm Drain; Street/Curb	0	100	2016.12.15 04.50.00	Rainfall Exceeded Design, I and I (Separate CS Only)	Un-named tributary to Humboldt Bay
Eureka City	2022.02.08	Category 2	2712 T St	null	Manhole	No	Yes	Yes	Drainage Channel; Paved Surface; Street	0	0	2016.12.15 10.08.00	Rainfall Exceeded Design, I and I	
Eureka City	2017.03.06	Category 1	8th St between H and I	null	Force Main	Yes	Yes	No	Paved Surface; Street/Curb and Gutter; Surface	4200	900	2017.02.21 09.15.00	Pipe Structural Problem/Failure	Humboldt Bay
Eureka City	2017.03.06	Category 1	B & Harris gulch	isolated gravity line in a wooded area behind homes	Gravity Mainline	Yes	No	Not Applicable	Surface Water; Unpaved surface	3000	3000	2017.02.24 03.45.00	Other (specify below)	un-named tributary to Martin Slough
Eureka City	2017.04.07	Category 1	1911 Hilfiker lane	private sewer pump and wet well.	Other sewer system structure	Yes	Yes	Yes	Surface Water	80	40	2017.03.28 02.15.00	Vandalism	NA

AGENCY	CERT_DT	SPILL_TYPE	SPILL_LOC_NAME	SPILL_LOC_DESC	APPEAR_PT	REACH_SURFACE	REACH_STORM_DRAINPIPE	RETURN_TO_SSS	FINAL_SURFACE	SPILL_VOLUME	SPILL_VOLUME_REACH_SURFACE	START_DT	SPILL_CAUSE	SURFACE_WATER_IMPACT
Eureka City	2017.04.25	Category 3	Alley between Rudy/Allard/McCullens	null	Manhole	No	No	Not Applicable - Spill did not reach a separate storm drainpipe	Paved Surface	15	0	2017.04.22 09.36.00	Grease Deposition (FOG)	
Eureka City	2017.07.03	Category 1	Alley between C & D St, 3rd & 4th st	null	Manhole	Yes	Yes	No	Separate Storm Drain; Street/Curb and Gutter	775	25	2017.06.30 08.15.00	Debris-Rags	Humboldt Bay
Eureka City	2022.02.08	Category 1	2514 G Street	2514 G Street, G5 clean out in sidewalk	Lower Lateral (Public)	Yes	No	Not Applicable - Spill did not reach a separate storm drainpipe	Street/Curb and Gutter	0	110	2018.03.22 09.05.00	Debris-General	Not applicable
Eureka City	2022.02.08	Category 3	Vigo & Broadway	null	Manhole	No	No	Not Applicable - Spill did not reach a separate storm drainpipe	Paved Surface	55	0	2018.05.30 07.45.00	Debris-General	
Eureka City	2022.02.08	Category 3	2155 S Street, Eureka, Ca, Zane Middle	null	Manhole	No	No	Not Applicable - Spill did not reach a separate storm drainpipe	Unpaved surface	5	0	2018.06.05 12.45.00	Vandalism	
Eureka City	2022.02.08	Category 3	2825 M St. Eureka, Ca	null	Upper Lateral (Private)	No	No	Not Applicable - Spill did not reach a separate storm drainpipe	Other (specify below)	30	0	2018.06.18 16.20.00	Debris-General	

AGENCY	CERT_DT	SPILL_TYPE	SPILL_LOC_NAME	SPILL_LOC_DESC	APPEAR_PT	REACH_SURFACE	REACH_STORM_DRAINPIPE	RETURN_TO_SSS	FINAL_SPILL_DEPTH	SPILL_VOL	SPILL_VOL_REACH_SURF	START_DT	SPILL_CAUSE	SURFACE_WATER_IMPACT
Eureka City	2022.02.08	Category 3	Spring St. & Hawthorne St.	null	Manhole	No	No	Not Applicable - Spill did not reach a separate storm drainpipe	Street/Curb and Gutter	75	0	2018.07.08 12.15.00	Grease Deposition (FOG)	
Eureka City	2022.02.08	Category 3	3225 Ingley Ingley Manhole #244 Behind Address	3225 Ingley Manhole #244 is Behind Address	Manhole	No	No	Not Applicable - Spill did not reach a separate storm drainpipe	Unpaved surface	75	0	2018.07.08 20.15.00	Debris-General	
Eureka City	2022.02.08	Category 3	1911 Hilfiker Lane, Eureka, Ca.	null	Other sewer system structure	No	No	Not Applicable - Spill did not reach a separate storm drainpipe	Street/Curb and Gutter	35	0	2018.08.15 01.00.00	Other (specify below)	
Eureka City	2022.02.08	Category 3	1911 Hilfiker Lane, Eureka, Ca. 95501	Private Lift Station	Other sewer system structure	No	No	Not Applicable - Spill did not reach a separate storm drainpipe	Street/Curb and Gutter	35	0	2018.08.15 12.45.00	Other (specify below)	
Eureka City	2022.02.08	Category 3	9th & L St., Eureka, Ca	South East corner of 9th & L St.	Gravity Mainline	No	No	Not Applicable - Spill did not reach a separate storm drainpipe	Street/Curb and Gutter	875	0	2018.11.19 08.45.00	Debris-General	
Eureka City	2022.02.08	Category 3	Hawthorne & Spring St. Eureka,	null	Manhole	No	No	Not Applicable - Spill did not reach a separate storm drainpipe	Street/Curb and Gutter	700	0	2018.11.24 10.10.00	Grease Deposition (FOG)	

AGENCY	CERT_DT	SPILL_TYPE	SPILL_LOC_NAME	SPILL_LOC_DESC	APPEAR_PT	REACH_SURFACE	REACH_STORM_DRAINPIPE	RETURN_TO_SSS	FINAL_SPILL_DEST	SPILL_VOL	SPILL_VOL_REACH_SURF	START_DT	SPILL_CAUSE	SURFACE_WATER_IMPACT
Eureka City	2022.02.08	Category 3	804 K St. Eureka, Ca	null	Lateral Clean Out (Public)	No	No	Not Applicable - Spill did not reach a separate storm drainpipe	Street/Curb and Gutter	300	0	2018.11.28 08.54.00	Root Intrusion	
Eureka City	2019.03.04	Category 3	1626 McCullens St Eureka California 95503	Residence back yard.	Lateral Clean Out (Private)	No	No	Not Applicable - Spill did not reach a separate storm drainpipe	Unpaved surface	25	0	2018.12.03 12.30.00	Debris-General	
Eureka City	2019.03.04	Category 1	15th & Union St., Eureka, Ca	15th & Union St., Eureka, Ca Manhole #	Manhole	Yes	Yes	No	Separate Storm Drain; Street/Curb and Gutter; Surface Water	3675	1675	2019.02.25 09.05.00	Pipe Structural Problem/Failure	Humboldt Bay
Eureka City	2019.03.04	Category 1	1st Street & T Street	null	Manhole	Yes	Yes	No	Surface Water	90	90	2019.02.26 11.00.00	Other (specify below)	Humboldt Bay
Eureka City	2019.03.04	Category 1	3576 H Street, Eureka, Ca	H St. Between Manzanita & Madrone	Manhole	Yes	Yes	No	Surface Water	750	750	2019.02.26 22.45.00	Rainfall Exceeded Design, I and I (Separate CS Only)	Martin Slough

AGENCY	CERT_DT	SPILL_TYPE	SPILL_LOC_NAME	SPILL_LOC_DESC	APPEAR_PT	REACH_SURFACE	REACH_STORM_DRAINPIPE	RETURN_TO_SSS	FINAL_SPILL_DEST	SPILL_VOLUME	SPILL_VOLUME_REACH_SURFACE	START_DT	SPILL_CAUSE	SURFACE_WATER_IMPACT
Eureka City	2019.03.05	Category 1	14th and R St.	Intersection of 14th & R St.	Other sewer system structure	Yes	Yes	No	Other (specify below)	28420	3420	2019.02.27 00.00.00	Rainfall Exceeded Design, I and I (Separate CS Only)	Humboldt Bay
Eureka City	2019.03.05	Category 1	1050 West Avenue	Manhole	Manhole	Yes	Yes	No	Surface Water	76035	1035	2019.02.27 00.45.00	Rainfall Exceeded Design, I and I (Separate CS Only)	Humboldt Bay
Eureka City	2019.03.04	Category 1	Harris Ave. and Central Ave., Eureka, Ca	null	Manhole	Yes	Yes	No	Surface Water	20400	5400	2019.02.27 03.00.00	Other (specify below)	Humboldt Bay
Eureka City	2019.08.16	Category 3	929 Koster St.	paved surface	Lateral Clean Out (Private)	No	No	Not Applicable	Paved Surface	10	0	2019.08.12 13.00.00	Debris-Rags	
Eureka City	2019.09.24	Category 3	820 A St. Eureka, Ca	Clean out in alley.	Lateral Clean Out (Public)	No	No	Not Applicable	Paved Surface	10	0	2019.09.19 09.05.00	Debris-General	

AGENCY	CERT_DT	SPILL_TYPE	SPILL_LOC_NAME	SPILL_LOC_DESC	APPEAR_PT	REACH_SURFACE	REACH_STORM_DRAINPIPE	RETURN_TO_SSS	FINAL_SPILL_DEST	SPILL_VOL	SPILL_VOL_REACH_SURF	START_DT	SPILL_CAUSE	SURFACE_WATER_IMPACT
Eureka City	2022.02.08	Category 3	2905 Ocean Ave. Eureka, CA	2905 Ocean Ave. Eureka, CA	Lateral Clean Out (Public)	No	No	Not Applicable	Paved Surface	5	0	2019.09.28 08.15.00	Debris-General	
Eureka City	2022.02.08	Category 1	2303 Hillside, Eureka, Ca	2303 Hillside Eureka, Ca	Manhole	Yes	Yes	No	Street/Curb and Gutter; Surface Water	0	168	2019.10.23 07.45.00	Root Intrusion	Un-named tributary to Humboldt Bay, Eureka, CA
Eureka City	2022.02.08	Category 1	3300 Broadway Eureka, Ca	Parking lot of Bayshore Mall. 3300 Broadway St. Eureka, Ca 95501 Manhole Near Russ Store	Manhole	Yes	Yes	No	Paved Surface	0	200	2019.12.10 11.15.00	Pump Station Failure-Mechanical	Drainage channel to Humboldt Bay
Eureka City	2022.02.08	Category 3	1145 Leslie Road, Eureka Ca	1145 Leslie Road Eureka, Ca. Spill located 415 Feet into the woods.	Manhole	No	No	Not Applicable	Unpaved surface	200	0	2020.01.10 15.45.00	Root Intrusion	

AGENCY	CERT_DT	SPILL_TYPE	SPILL_LOC_NAME	SPILL_LOC_DESC	APPEAR_PT	REACH_SURFACE	REACH_STORM_DRAINPIPE	RETURN_TO_SSS	FINAL_SPILL_DEST	SPILL_VOLUME	SPILL_VOLUME_REACH_SURFACE	START_DT	SPILL_CAUSE	SURFACE_WATER_IMPACT
Eureka City	2021.06.24	Category 1	Myrtle & West Avenue Intersection, City of Eureka	null	Manhole	Yes	Yes	No	Surface Water	4000	1000	2020.01.12 13.30.00	Root Intrusion	Eureka Slough
Eureka City	2022.02.08	Category 1	307 14th St. Eureka, CA	307 14th St., Food Bank Floor Drain	Inside Building or Structure	Yes	Yes	No	Street/Curb and Gutter	0	15	2020.02.28 08.20.00	Grease Deposition (FOG)	Humboldt Bay
Eureka City	2022.02.08	Category 3	O st. & Hemlock St., Eureka, Ca	null	Manhole	No	No	Not Applicable - Spill did not reach a separate storm drainpipe	Paved Surface	900	0	2020.03.06 01.08.00	Debris-General	
Eureka City	2022.02.08	Category 3	805 Harris St. Eureka, CA	805 Harris St., Water coming out of cleanout	Lateral Clean Out (Public)	No	No	Not Applicable - Spill did not reach a separate storm drainpipe	Street/Curb and Gutter	25	0	2020.04.05 14.45.00	Debris-Wipes/Non-Dispersables	
Eureka City	2022.02.08	Category 3	1566 Allard, Eureka, CA	1566 Allard, Manhole in Alley	Manhole	No	No	Not Applicable - Spill did not reach a separate storm drainpipe	Paved Surface	10	0	2020.04.07 16.05.00	Debris-General	

AGENCY	CERT_DT	SPILL_TYPE	SPILL_LOC_NAME	SPILL_LOC_DESC	APPEAR_PT	REACH_SURFACE	REACH_STORM_DRAINPIPE	RETURN_TO_SSS	FINAL_SPILL_DEST	SPILL_VOL	SPILL_VOL_REACH_SURF	START_DT	SPILL_CAUSE	SURFACE_WATER_IMPACT
Eureka City	2022.02.08	Category 3	908 P St. Eureka, Ca	Abandoned pressure lateral had cap on it that rotted and caused it to drain into back yard.	Lower Lateral (Private)	No	No	Not Applicable - Spill did not reach a separate storm drainpipe	Street/Curb and Gutter	15	0	2020.04.09 08.51.00	Pipe Structural Problem/Failure	
Eureka City	2022.02.08	Category 3	1444 Union St. Eureka, Ca	1444 Union St. Eureka, Ca Alley Clean Out	Upper Lateral (Private)	No	No	Not Applicable - Spill did not reach a separate storm drainpipe	Paved Surface	50	0	2020.05.08 11.45.00	Root Intrusion	
Eureka City	2022.02.08	Category 3	3506 Lowell street, Eureka, CA 95501	3506 Lowell street, Eureka, CA	Gravity Mainline	No	No	Not Applicable - Spill did not reach a separate storm drainpipe	Street/Curb and Gutter	30	0	2020.06.03 19.00.00	Root Intrusion	
Eureka City	2022.02.08	Category 3	3550 G St., Eureka Ca 95503	3550 G St. Eureka, Ca 95503	Lateral Clean Out (Private)	No	No	Not Applicable - Spill did not reach a separate storm drainpipe	Paved Surface	15	0	2020.06.23 12.20.00	Debris-General	
Eureka City	2022.02.08	Category 3	3630 Glen St. Eureka, CA 95503	Back yard. Plumber cleaned spill.	Lateral Clean Out (Private)	No	No	Not Applicable - Spill did not reach a separate storm drainpipe	Unpaved surface	10	0	2020.08.05 09.40.00	Debris-General	

AGENCY	CERT_DT	SPILL_TYPE	SPILL_LOC_NAME	SPILL_LOC_DESC	APPEAR_PT	REACH_SURFACE	REACH_STORM_DRAINPIPE	RETURN_TO_SSS	FINAL_SPILL_DEST	SPILL_VOL	SPILL_VOL_REACH_SURFACE	START_DT	SPILL_CAUSE	SURFACE_WATER_IMPACT	
Eureka City	2022.02.08	Category 3	2234 A St. Eureka, CA 95503	Back yard. Plumber pulled clean out. which caused back flow.	Lateral Clean Out (Private)	No	No	Not Applicable	Spill did not reach a separate storm drainpipe	Unpaved surface	20	0	2020.08.07 02.40.00	Debris-General	
Eureka City	2022.02.08	Category 3	2511 F St. Eureka, CA. 95501	2511 F ST, The clean out in the sidewalk	Lateral Clean Out (Private)	No	No	Not Applicable	Spill did not reach a separate storm drainpipe	Street/Curb and Gutter	0	0	2020.09.08 11.45.00	Debris-Wipes/Non-Dispersables	
Eureka City	2022.02.08	Category 3	3413 G St. Eureka, CA 95501	3413 G St. Eureka, CA	Lateral Clean Out (Private)	No	No	Not Applicable	Spill did not reach a separate storm drainpipe	Street/Curb and Gutter	10	0	2020.11.07 15.15.00	Root Intrusion	
Eureka City	2021.06.24	Category 3	3805 H street , Eureka, Ca. 95501	3805 H Street Eureka , Ca 95501	Lateral Clean Out (Public)	No	No	Not Applicable	Spill did not reach a separate storm drainpipe	Paved Surface	100	0	2021.03.23 07.40.00	Debris-General	
Eureka City	2021.07.30	Category 3	3805 H St., Eureka Ca.	3805 H St., Eureka, CA	Gravity Mainline	No	No	Not Applicable	Spill did not reach a separate storm drainpipe	Street/Curb and Gutter	15	0	2021.07.29 13.25.00	Debris-Wipes/Non-Dispersables	
Eureka City	2021.10.25	Category 3	1091 Vista Drive Eureka CA.	140 ft. north of 1091 Vista Drive, Eureka, CA	Manhole	No	No	Not Applicable	Spill did not reach a separate storm drainpipe	Unpaved surface	75	0	2021.10.22 16.10.00	Debris-General	

AGENCY	CERT_DT	SPILL_TYPE	SPILL_LOC_NAME	SPILL_LOC_DESC	APPEAR_PT	REACH_SURFACE	REACH_STORM_DRAINPIPE	RETURN_TO_SSS	FINAL_SPILL_DEPTH	SPILL_VOLUME	SPILL_VOLUME_REACHED_SURFACE	START_DT	SPILL_CAUSE	SURFACE_WATER_IMPACT
Eureka City	2022.01.03	Category 3	269 15th St. Eureka, CA	Cleanout on private property	Lateral Clean Out (Private)	No	No	Not Applicable Spill did not reach a separate storm drainpipe	Street/Curb and Gutter	150	0	2021.12.20 09.20.00	Debris-General	
Eureka City	2022.01.03	Category 3	2223 4Th St Eureka Ca	2223 4th Street, Eureka, Ca.	Lateral Clean Out (Private)	No	No	Not Applicable Spill did not reach a separate storm drainpipe	Paved Surface	50	0	2021.12.22 08.50.00	Debris-General	
Eureka City	2022.01.03	Category 1	Intersection of Fairway Dr. & Lunblade Dr., Eureka CA.	null	Manhole	Yes	No	Not Applicable Spill did not reach a separate storm drainpipe	Drainage Channel	0	300	2021.12.29 07.48.00	Root Intrusion	Martin Slough
Eureka City	2022.02.08	Category 3	1830 Madrone Street, Eureka, CA 95503	Manhole located in front of address at 1830 Madrone street, Eureka, CA	Manhole	No	No	Not Applicable Spill did not reach a separate storm drainpipe	Unpaved surface	10	0	2022.01.09 15.10.00	Debris-Rags	
Eureka City	2022.04.30	Category 1	Pound Rd. Eureka Ca	Pound Road Eureka CA	Force Main	Yes	No	Not Applicable Spill did not reach a separate storm drainpipe	Drainage Channel	750	750	2022.04.28 11.55.00	Pipe Structural Problem/Failure	Martin Slough

**Attachment 3**

<b>Year</b>	<b>Quarter</b>	<b>Eureka Statement Regarding Blend and/or Bypass</b>
2017	1	"We had significant bypassing throughout the quarter due to tremendous rain totals. We sent flow into our overflow marsh on February 20th and 21st as well as March 20th and 21st. Due to these events happening at night, we did not take obnoxious residuals."
2017	2	"We had significant bypassing due to wet weather in April. We also had one bypass day in May and two in June."
2018	1	"The City also had multiple blending events in January and March."
2018	2	"The City had multiple blending events in April."
2018	4	"The City had two blending events in December."
2019	1	"The City had multiple bypasses during the first quarter of 2019 as well as marsh overflow events in January and February."
2019	2	"The City had three bypass events in April."
2019	4	"The City had three bypass events in December."
2020	1	"In January, we had five blend/bypass events."
2020	2	"There was one bypass event in April due to a rain event."

**Attachment 4**

<b>Date</b>	<b>Parameter</b>	<b>Limit</b>	<b>Sampling Result</b>
12/30/21	Ammonia	4.1 mg/L monthly	8.2 mg/L
12/13/21	Ammonia	10 mg/L daily	14 mg/L
11/30/21	Ammonia	4.1 mg/L monthly	5.5 mg/L
9/22/21	Fecal Coliform	43 MPN/100 mL max	130 MPN/100 mL
8/31/21	Fecal Coliform	14 MPN/100mL monthly	17 MPN/100 mL
8/17/21	Fecal Coliform	43 MPN/100 mL max	50 MPN/100 mL
8/11/21	Fecal Coliform	43 MPN/100 mL max	50 MPN/100 mL
8/4/21	Fecal Coliform	43 MPN/100 mL max	50 MPN/100 mL
8/3/21	Fecal Coliform	43 MPN/100 mL max	50 MPN/100 mL
7/19/21	Fecal Coliform	43 MPN/100 mL max	220 MPN/100 mL
7/14/21	Settleable Solids	.2 mg/L daily	.3 mg/L
7/13/21	Fecal Coliform	43 MPN/100 mL max	50 MPN/100 mL
7/4/21	Fecal Coliform	43 MPN/100 mL max	50 MPN/100 mL
6/24/21	Fecal Coliform	43 MPN/100 mL max	80 MPN/100 mL
1/31/21	Ammonia	4.1 mg/L monthly	6.0 mg/L
12/31/20	Ammonia	4.1 mg/L monthly	6.6 mg/L
10/31/20	Ammonia	4.1 mg/L monthly	8.9 mg/L
10/21/20	Fecal Coliform	43 MPN/100 mL max	80 MPN/100 mL
10/6/20	Ammonia	10 mg/L daily	16 mg/L
8/5/20	Fecal Coliform	43 MPN/100 mL max	50 MPN/100 mL
8/3/20	Fecal Coliform	43 MPN/100 mL max	130 MPN/100 mL

Date	Parameter	Limit	Sampling Result
12/31/19	Ammonia	4.1 mg/L monthly	6.6 mg/L
11/30/19	Ammonia	4.1 mg/L monthly	4.4 mg/L
7/31/19	Ammonia	4.1 mg/L monthly	7.4 mg/L
7/3/19	Ammonia	10 mg/L daily	12 mg/L
6/30/19	Ammonia	4.1 mg/L monthly	9.5 mg/L
6/13/19	Ammonia	10 mg/L daily	12 mg/L
4/30/19	Cyanide	0.5 ug/L monthly	2.9 ug/L
4/1/19	Cyanide	1.0 ug/L daily	2.9 ug/L
2/11/19	Fecal Coliform	43 MPN/100 mL max	50 MPN/100 mL
1/31/19	Ammonia	4.1 mg/L monthly	5.3 mg/L
1/1/19	Cyanide	1.0 ug/L daily	1.9 ug/L
1/1/19	Cyanide	0.5 ug/L monthly	1.9 ug/L
12/31/18	Ammonia	4.1 mg/L monthly	5.8 mg/L
11/30/18	Ammonia	4.1 mg/L monthly	6.4 mg/L
10/31/18	Ammonia	4.1 mg/L monthly	5.3 mg/L
9/30/18	Ammonia	4.1 mg/L monthly	7.1 mg/L
7/2/18	Cyanide	1.0 ug/L daily	2.9 ug/L
7/2/18	Cyanide	0.5 ug/L monthly	2.9 ug/L
1/31/18	Ammonia	4.1 mg/L monthly	5.4 mg/L
1/3/18	Cyanide	1.0 ug/L daily	1.1 ug/L
1/3/18	Cyanide	0.5 ug/L monthly	1.1 ug/L
11/30/17	Ammonia	4.1 mg/L monthly	4.4 mg/L
11/2/17	Fecal Coliform	43 MPN/100 mL max	49 MPN/100 mL
10/31/17	Ammonia	4.1 mg/L monthly	5.7 mg/L
9/17/17	Fecal Coliform	43 MPN/100 mL max	50 MPN/100 mL
9/15/17	Fecal Coliform	43 MPN/100 mL max	130 MPN/100 mL

<b>Date</b>	<b>Parameter</b>	<b>Limit</b>	<b>Sampling Result</b>
8/31/17	Fecal Coliform	14 MPN/100mL monthly	17 MPN/100 mL
8/21/17	Fecal Coliform	43 MPN/100 mL max	170 MPN/100 mL
8/3/17	Fecal Coliform	43 MPN/100 mL max	130 MPN/100 mL
7/31/17	Ammonia	4.1 mg/L monthly	9.4 mg/L
7/3/17	Ammonia	10 mg/L daily	12 mg/L
6/30/17	Ammonia	4.1 mg/L monthly	13 mg/L
6/19/17	Fecal Coliform	43 MPN/100 mL max	240 MPN/100 mL
6/19/17	Ammonia	10 mg/L daily	18 mg/L
6/5/17	Ammonia	10 mg/L daily	13 mg/L
2/9/17	Fecal Coliform	43 MPN/100 mL max	900 MPN/100 mL
1/31/17	Ammonia	4.1 mg/L monthly	6.4 mg/L
1/10/17	Fecal Coliform	43 MPN/100 mL max	140 MPN/100 mL
12/31/16	Ammonia	4.1 mg/L monthly	5.6 mg/L
11/30/16	Ammonia	4.1 mg/L monthly	7.3 mg/L
10/31/16	Ammonia	4.1 mg/L monthly	7.3 mg/L