

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN FRANCISCO BAY REGION**

CEASE AND DESIST ORDER R2-2015-XXXX
REQUIRING THE

SONOMA VALLEY COUNTY SANITATION DISTRICT
SANITARY SEWER COLLECTION SYSTEM
IN SONOMA COUNTY
TO

CEASE AND DESIST DISCHARGING WASTE
IN VIOLATION OF

REGIONAL WATER BOARD ORDERS R2-2008-0090 AND R2-2014-0020,
STATE WATER BOARD ORDER 2006-0003-DWQ,
STATE WATER BOARD ORDER WQ 2013-0058-EXEC,
CLEAN WATER ACT SECTION 301, AND
CALIFORNIA WATER CODE SECTION 13376

WHEREAS the California Regional Water Quality Control Board, San Francisco Bay Region (hereinafter Regional Water Board), finds that:

1. The Sonoma Valley County Sanitation District (hereinafter Discharger) owns and operates a treatment plant and collection system. From the period of August 1, 2010, to June 30, 2014, the collection system was subject to Regional Water Board Order R2-2008-0090 (2008 NPDES Permit). From the period of July 1, 2014, to the present, the collection system is subject to Regional Water Board Order R2-2014-0020 (2014 NPDES Permit). Also, the collection system is subject to State Water Resources Control Board (State Water Board) Order 2006-0003-DWQ, *Statewide General Waste Discharge Requirements for Sanitary Sewer Systems* (Sanitary Sewer Order), and State Water Board Order WQ 2013-0058-EXEC, *Adopting Amended Monitoring and Reporting Requirements for the Sanitary Sewer Order* (MRP).
2. The Discharger signed a notice of intent to comply with the Sanitary Sewer Order, and any subsequent amendments, on August 15, 2006.
3. The Discharger's collection system includes about 132 miles of gravity sewer pipe, 3 miles of force mains, and 2 pump stations. The Discharger's collection system collects and transports approximately 2.7 million gallons per day (MGD) of wastewater to its wastewater treatment plant (plant), and serves an approximate population of 36,000. The plant's design average dry weather flow is 3 MGD.

4. The 2008 and 2014 NPDES Permits, and the Sanitary Sewer Order all prohibit sanitary sewer overflows (SSOs) that result in a discharge of untreated or partially treated wastewater to waters of the United States (Discharge Prohibition III.E of the 2008 and 2014 NPDES Permits, and Prohibition C.1 of the Sanitary Sewer Order).
5. The Discharger violated Discharge Prohibition III.E of the 2008 and 2014 NPDES Permits, and Prohibition C.1 of the Sanitary Sewer Order. Between August 1, 2010, and January 31, 2015, the Discharger reported a total of 52 SSOs from the Discharger's collection system to the State's California Integrated Water Quality System (CIWQS). Of the total, 46 SSOs reached waters of the United States and are violations of Discharge Prohibition III.E of the 2008 and the 2014 NPDES Permits, and Prohibition C.1 of the Sanitary Sewer Order. Additionally, 39 of the 46 SSOs were caused by insufficient capacity of the Discharger's collection system resulting in approximately 425,000 gallons of untreated wastewater that discharged to waters of the United States. A detailed list of the 52 SSOs is contained in Attachment A, incorporated herein by reference.
6. The Sanitary Sewer Order specifies provisions for which enrollees must comply as operators of a collection system:
 - a. Enrollees must properly, manage, operate, and maintain all parts of the collection system (Provision D.8).
 - b. Enrollees must allocate adequate resources for the operation, maintenance, and repair of its collection system, by establishing a proper rate structure, accounting mechanisms, and auditing procedures to ensure adequate revenues and expenditures (Provision D.9).
 - c. Enrollees shall take all feasible steps to eliminate SSOs (Provision D.3).
 - d. Enrollees shall provide adequate capacity to convey base and peak flows (Provision D.10).
 - e. Enrollees shall develop and implement a written Sewer System Management Plan (SSMP) that contains mandatory elements, and comply with a completion time schedule and a schedule for developing the funds needed for a capital improvement plan (Provisions D.11, D.13 and D.15).
 - f. Enrollees shall prepare and implement a system evaluation and capacity assurance plan that will provide hydraulic capacity of key sanitary sewer system elements for dry weather peak flow conditions,

as well as the appropriate design storm or wet weather event (Provision D.13(viii)).

7. The Discharger is currently in violation of, or is threatening to violate, Provisions D.8, D.9, and D.10 of the Sanitary Sewer Order by not allocating adequate resources for, and thus failing to ensure for, the proper operation, maintenance, repair and adequate capacity of its collection system.
 - a. Due to failure to provide for adequate funding and unavoidable construction and right-of-way hurdles, the Discharger is four or more years behind its November 2006 Capital Projects Plan (2006 CPP) in implementing priority sewer trunk main and collection system replacement/rehabilitation projects intended to eliminate SSOs related to inadequate capacity and structural deficiencies. The right-of-way hurdles involve procuring right-of-way from commercial, local and State agencies, and numerous private property owners through acquisitions such as agreements and eminent domain and will take nearly two years per project to complete depending upon the complexities of property title.
 - b. The 2006 CPP included the Discharger's priority projects from its April 2002 wet weather overflow (WVO) prevention study,¹ which identified and prioritized capital improvement projects by combining upsizing and structural deficiency mitigation.
 - c. The 2006 CPP had scheduled a trunk main (approximately 5 miles from Sonoma to Agua Caliente) capacity upsizing project to start construction in fiscal year 2010/2011 with completion by fiscal year 2012/2013 at an approximate cost of \$6.15 million (M). If completed as scheduled, this project would have eliminated or significantly reduced 39 of the 46 capacity-related SSOs referenced in finding 5 above.
 - d. The 2006 CPP included a schedule to implement the Discharger's strategic plan to address the needs of its collection system, treatment plant, and reclamation system while also considering financial resources. With its available capital resources, the Discharger chose to obtain limited-availability grant funds to implement recycled water and water quality improvement projects including a recycled water storage reservoir (completed construction in 2012 at an approximate cost of \$2.3 M), the Napa Sonoma Salt Marsh reclaimed water pipeline (completed construction at an approximate cost of \$5.5M), and a biosolids handling facility upgrade (completed construction in 2014 at an approximate cost of \$4.3 M). Also, the Discharger proceeded with

¹ The Discharger completed the April 2002 WVO prevention study in accordance with a 1999 Regional Water Board notice of violation for SSOs. The Discharger based the WVO prevention study on its 2001 Sewer Capacity Study.

the design and right-of-way work for the trunk main projects at the same time that the recycled water and water improvement projects were constructed.

- e. The Discharger has initiated a Sewer Capacity Study to update its sewer system master plan and collection system modelling, and anticipates completing the sewer system master plan by December 31, 2015. The Sewer Capacity Study may identify projects necessary to reduce or eliminate the SSOs and develop a schedule to implement these projects.
8. The Discharger threatens to violate Discharge Prohibition III.E of the 2014 NPDES Permit, and Prohibition C.1 of the Sanitary Sewer Order, by failing to properly manage, operate, and maintain parts of its collection system.
- a. As stated in finding 7.b, the Discharger's WWO prevention study identified and prioritized capital improvement projects, which included a total of approximately 9 miles of proposed sewer capacity improvements. Currently, the Discharger has approximately 4.4 miles of capacity deficient trunk mains left to replace at an approximate cost of \$8.9 M, which are reliant on future not-yet-approved sewer rate increases. The \$8.9 M includes completion of three trunk main replacement projects. Two of the three projects will adequately address the capacity-related SSOs included in this enforcement action at an approximate cost of \$6.15 M. If these capacity deficient trunk mains are not addressed, it is likely that SSOs would occur during wet weather.
 - b. The Discharger's WWO prevention study identified and prioritized several collection system service areas in need of rehabilitation to correct sewer pipe structural deficiencies. The collective length of the identified collection system pipe is approximately 7 miles at an approximate cost of \$5 M that is reliant on future not-yet-approved sewer rate increases.

LEGAL AUTHORITY

9. Water Code section 13301 authorizes the Regional Water Board to issue a cease and desist order when it finds that a discharge of waste is taking place, or threatening to take place, in violation of requirements or discharge prohibitions prescribed by the Regional or State Water Board.
10. Water Code section 13267 authorizes the Regional Water Board to require any person who discharged, discharges, or is suspected of having discharged or discharging, within its region, to furnish technical or monitoring program reports in connection with any action relating to any requirement authorized by Division 7 of the Water Code.

11. This Order requires the Discharger to submit reports and technical information pursuant to Water Code section 13267. The reports and technical information required herein are necessary to assess system management and implementation of necessary corrective measures to reduce and eliminate SSOs and associated violations and to ensure compliance with this Order. The evidence supporting this requirement is contained in the public file for this matter. The burden, including costs, of the reports required by this Order bear a reasonable relationship to the need for the reports and the benefits obtained from them.
12. This Order is an enforcement action and, as such, is exempt from the provisions of the California Environmental Quality Act (CEQA) (Pub. Res. Code § 21000 *et seq.*) in accordance with Title 14, California Code of Regulations section 15321. Actions associated with implementing this Order may not be exempt from CEQA and may need to be evaluated by the appropriate lead CEQA agency.
13. The Regional Water Board notified the Discharger and interested persons of its intent to consider adoption of this Order, and provided an opportunity to submit written comments and appear at a public hearing. The Regional Water Board, in a public hearing, heard and considered all comments.
14. Any person adversely affected by this action of the Regional Water Board may petition the State Water Board to review the action. The petition must be received by the State Water Board Office of Chief Counsel, P.O. Box 100, Sacramento, CA 95812-0100, within 30 days of the date which the action was taken. Copies of the law and regulations applicable to filing petitions will be provided upon request.

IT IS HEREBY ORDERED, in accordance with Water Code section 13301 and section 13267, that effective immediately, the Discharger shall cease and desist from discharging and threatening to discharge wastes, in violation of the Sanitary Sewer Order and shall take appropriate remedial or preventative actions as follows:

1. Complete Rehabilitation and Capital Improvement Projects

The Discharger shall complete the capital improvement projects identified in the 2006 CPP in accordance with the schedule in Table 1 below.

Table 1 Capital Improvement Projects

Project	Project Description	Project Completion Date
1. Trunk Main Replacement MH 90-3 to MH 135-1 (Project 12 of 2006 CPP)	Replace 7,108 linear feet of 21-inch diameter reinforced concrete trunk main with 27-inch diameter trunk main; replace 31 manholes; and address structural deficiency and capacity restricted sections.	By October 31, 2022 ¹
2. Trunk Main Replacement MH 48-2 to MH 90-3 (Project 13 of 2006 CPP)	Replace 8,245 linear feet of 21-inch and 18-inch diameter reinforced concrete trunk main with appropriately larger sized force main; replace 35 manholes; and address structural deficiency and capacity restricted sections.	By October 31, 2024

Note: 1) Project 1 consists of three phases. The first phase is currently being designed and is estimated to be under construction in 2017. The design of the second phase is anticipated to begin in 2018. Construction of Phase 2 is anticipated to begin in 2019. Design of Phase 3 is anticipated to begin in 2020. Construction of Phase 3 is anticipated to begin one year after the design is completed in 2021. The District has included one year for unforeseen problems. Overall, the District anticipates completing Project 1 by October 31, 2022.

2. Update Capacity Assessment and Implement Improvement Projects

- a. By August 1, 2016, the Discharger shall complete its Sewer Capacity Study to identify, prioritize, and develop a schedule for completing projects necessary to reduce or eliminate the recurring SSOs cited in this Order through an update of, or as a supplement to, the 2006 CPP.
- b. The Discharger shall implement the projects that are necessary to reduce or eliminate the recurring SSOs cited in this Order per the schedule in Provision 2.a above with consideration of any comments from the Executive Officer.

3. Report on Non-Compliance for Project Completion

If the Discharger fails to achieve compliance with any of the tasks in provisions 1 and 2 above, the Discharger shall submit a report no later than 30 days after the respective deadline that provides (1) sufficient information concerning the specific circumstances leading to noncompliance, (2) evidence for any pertinent affirmative defenses, and (3) a plan and time schedule to remedy the violation as soon as possible.

4. Set Adequate Financing to Ensure Compliance

- a. The Discharger shall submit a Rate/Funding Structure Report by August 1, 2016, describing the sewer rates or other financing it proposes to put in place to implement the tasks identified in this Order and the Sanitary Sewer Order, along with justification of the

appropriateness and adequacy of those rates or other financing to ensure adequate funding for implementation of the tasks.

- b. The Discharger shall evaluate its revenues and make necessary adjustments by July 1, 2017, and annually thereafter, to its ensuing fiscal year sewer rates or other financing to ensure adequate funding to complete tasks by the deadlines required in this Order and the Sanitary Sewer Order.
- c. If the Discharger fails to achieve compliance with Provision 4.a or to ensure adequate funding as required by 4.b, then the Discharger shall submit a report no later than on August 1 following the required task that provides (1) sufficient information concerning the specific circumstances leading to noncompliance, (2) provides evidence for any pertinent affirmative defenses, and (3) provides a plan and time schedule for remedying the violation as soon as possible.

5. Consider Private Sewer Lateral Rehabilitation Program

By July 1, 2016, the Discharger shall prepare and consider adopting an ordinance requiring (1) testing of private sewer laterals upon sale of property, and/or other appropriate triggers, which may include but are not limited to a remodel greater than \$75,000 or any remodel that adds a bathroom; reasonable exceptions such as a newer residence or a newer lateral system may be included in the ordinance; (2) repair or replacement of defective private sewer laterals as appropriate; and (3) evidence from property owner that the defective private sewer lateral has been repaired, rehabilitated, or replaced as condition to close of escrow, or the Discharger's sign-off on a building/plumbing permit.

6. Submit Annual Status Reports

By February 1, 2016, and annually thereafter for the duration of this Order, the Discharger shall submit a report providing the status of its rehabilitation and capital improvement projects required to be implemented in provisions 1 and 2. And starting with the annual status report due February 1, 2018, the Discharger shall include a summary of its efforts to evaluate and make necessary adjustments to sewer rates or other financing required by provision 4.b. For the improvement projects, the annual status reports shall include a table or list of all required projects along with a running tally of the progress of each project and a detailed summary of pipe repairs, replacements, and rehabilitations (locations and lengths) completed for each project during the prior calendar year.

- 7. Consequences of Non-Compliance.** If the Discharger fails to comply with the provisions of this Order the Regional Water Board can take additional enforcement action, which may include the imposition of administrative or judicial civil liability pursuant to Water Code sections

13331, 13350, 13268, and/or 13385, or referral to the Attorney General. The Executive Officer is authorized herein to refer violations of this Order to the Attorney General to take such legal action as he or she may deem appropriate.

8. Reservation of Enforcement Authority and Discretion. Nothing in this Order is intended to or shall be construed to limit or preclude the Regional Water Board from exercising its authority under any statute, regulation, ordinance, or other law, including but not limited to, the authority to bring enforcement against the Discharger in response to violations of its 2008 NPDES Permit.

9. Regulatory Changes. Nothing in this Order shall excuse the Discharger from meeting any more stringent requirements that may be imposed hereafter by changes in applicable and legally binding legislation, regulations, or generally applicable state-wide or regional requirements.

I, Bruce H. Wolfe, Executive Officer, do hereby certify that the foregoing is full, true, and correct copy of an order adopted by the Regional Water Board, on

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Bruce H. Wolfe, Executive Officer

Attachment A

Attachment A

Table of Sonoma Valley County Sanitation District reported SSOs in CIWQS from August 1, 2010, through January 31, 2015

Start Date	End Date	Spill Location	Gallons Discharged	Gallons Recovered	Gallons Reached Surface Water	Final Spill Destination	Impacted Surface Water	Cause ¹	Same SSO Location cited in 2011 ACLO ²
12/15/2014	12/15/2014	Meadowbrook Trailer Park	200	0	200	Surface Water	Agua Caliente Creek	Rainfall Exceeded Design, I and I (Separate CS only)	Yes
12/11/2014	12/12/2014	4 th Street W./ Andrieux St.	3570	0	3570	Surface Water	Fryer Creek	Rainfall Exceeded Design, I and I (Separate CS only)	No
12/11/2014	12/12/2014	4 th Street W./ Bettencourt St.	3375	0	3375	Surface Water	Fryer Creek	Rainfall Exceeded Design, I and I (Separate CS only)	No
12/11/2014	12/11/2014	18055 River Rd.	2750	0	2750	Surface Water	Sonoma Creek	Rainfall Exceeded Design, I and I (Separate CS only)	No
12/11/2014	12/12/2014	4 th Street E./ E Spain St.	12825	0	12825	Surface Water	Nathanson Creek	Rainfall Exceeded Design, I and I (Separate CS only)	Yes
12/11/2014	12/11/2014	Vailletti/ Casabella	22375	0	22375	Surface Water	Sonoma Creek	Rainfall Exceeded Design, I and I (Separate CS only)	No
12/11/2014	12/12/2014	Rancho Mobile Homes	65055	0	65055	Surface Water	Sonoma Creek	Rainfall Exceeded Design, I and I (Separate CS only)	Yes
12/11/2014	12/12/2014	18715 Sonoma Hwy.	35910	0	35910	Surface Water	Agua Caliente Creek	Rainfall Exceeded Design, I and I (Separate CS only)	Yes
12/3/2014	12/3/2014	18880 Hwy 12	600	0	600	Surface Water	Agua Caliente Creek to Sonoma Creek	Flow Exceeded Capacity	Yes
10/30/2014	10/30/2014	Bains Ave.	40	20	0	Unpaved Surface	NOT APPLICABLE²	Root Intrusion	No
4/30/2014	4/30/2014	765 Donald St. Sonoma, CA	200	10	0	Unpaved surface	NOT APPLICABLE²	Root Intrusion	No
4/29/2014	4/29/2014	472 5th Street West	1500	500	1000	Separate Storm Drain	Fryer Creek	Grease Deposition (FOG)	No
2/9/2014	2/9/2014	Casabelle & Vailletti, Boyes Hot Springs, CA	1650	0	1650	Surface Water	Sonoma Creek	Flow Exceeded Capacity	No
2/9/2014	2/9/2014	Rancho Vista Mobile Home Park	7420	0	7420	Surface Water	Pequeno Creek to Sonoma Creek	Flow Exceeded Capacity	Yes
2/8/2014	2/9/2014	Rancho Vista Mobile Home Park	39400	0	39400	Surface Water	Pequeno Creek to Sonoma Creek	Flow Exceeded Capacity	Yes
2/8/2014	2/8/2014	E. Spain St. & 4th St. East	3000	0	3000	Surface Water	Nathanson Creek	Flow Exceeded Capacity	Yes
2/8/2014	2/9/2014	Cedar and Vailletti, Boyes Hot Springs, CA	13200	0	13200	Surface Water	Sonoma Creek	Flow Exceeded Capacity	No
2/8/2014	2/9/2014	Casabella & Vailletti Agua Caliente, CA	4400	0	4400	Surface Water	Sonoma Creek	Flow Exceeded Capacity	No
2/8/2014	2/10/2014	18715 Sonoma Highway, Sonoma, CA	56250	0	56250	Surface Water	Agua Caliente Creek	Flow Exceeded Capacity	No
10/20/2013	10/20/2013	440 Baines Avenue	420	0	0	Unpaved surface	NOT APPLICABLE²	Root Intrusion	No
8/28/2013	8/28/2013	Moll Ct.	550	25	525	Separate storm drain; Street/curb and gutter; Surface water	Nathanson Creek	Pipe structural problem/failure	No
1/6/2013	1/6/2013	781 Martin St	200	0	200	Street/curb and gutter; Surface water	Sonoma Creek	Root intrusion	No
12/23/2012	12/23/2012	17324 Sonoma Hwy	18000	0	18000	Surface water	Sonoma Creek	Other – Severe storm causing flooding and I&I	Yes
12/23/2012	12/23/2012	18715 Sonoma Hwy	9000	0	9000	Surface water		Other - Severe storm causing flooding and I&I	No

Attachment A

Start Date	End Date	Spill Location	Gallons Discharged	Gallons Recovered	Gallons Reached Surface Water	Final Spill Destination	Impacted Surface Water	Cause ¹	Same SSO Location cited in 2011 ACLO
12/23/2012	12/23/2012	712 Oman Springs	88	0	88	Surface water	Sonoma Creek	Other – Severe storm causing flooding and I&I	No
12/23/2012	12/23/2012	1520 Burbank Dr.	8550	0	8550	Surface water	Sonoma creek	Other – Severe storm causing flooding and I&I	No
12/23/2012	12/23/2012	18881 Sonoma Hwy Meadowbrook	2275	0	2275	Surface water	Agua Caliente creek	Other – Severe storm causing flooding and I&I	No
12/23/2012	12/23/2012	17450 Vailletti Dr.	1650	0	1650	Surface water	Sonoma Creek	Other – Severe storm causing flooding and I&I	Yes
12/16/2012	12/16/2012	18775 Gilman Dr	123	123	0	Unpaved surface; Overflow contained within berm that was put in place	NOT APPLICABLE²	Other – Contractor hit main when new light pole was installed, Pipe full of gravel,	No
12/13/2012	12/13/2012	18764 Gillman Dr.	80	0	80	Separate storm drain; Street/curb and gutter; Surface water	Verano Creek	Other – Contractor hit main when new light pole was installed, Pipe full of gravel, also signs of grease, rags	No
12/2/2012	12/2/2012	17324 Sonoma Hwy	12750	0	12750	Separate storm drain; Surface water	Sonoma Creek	Other – Due to flooding and I&I, system overwhelmed, exceeded flow capacity	Yes
12/2/2012	12/2/2012	17397 Vailletti	630	0	650	Separate storm drain; Surface water	Sonoma creek	Other – Due to flooding and I&I, system overwhelmed, exceeded flow capacity	No
11/30/2012	11/30/2012	Sonoma Hwy 17324	45075	0	45075	Separate storm drain; Surface water	Sonoma Creek	Other – Due to flooding and I&I, system overwhelmed, exceeded flow capacity	Yes
11/30/2012	11/30/2012	17397 Vailletti	9262	0	9262	Separate storm drain; Surface water	Sonoma Creek	Other – Due to flooding and I&I, system overwhelmed, exceeded flow capacity	No
6/11/2012	6/11/2012	300 Bettencourt Street	5	4	1	Separate storm drain	Fryer Creek	Debris-Rags	No
1/20/2012	1/20/2012	Meadowbrook-18881 Sonoma Hwy, Sonoma	30	0	30	Surface water	Agua Caliente creek	Flow exceeded capacity	No
12/10/2011	12/10/2011	692 Cherry Ave	1200	500	600	Other (specify below)	Winkle creek	Grease deposition (FOG)	No
11/5/2011	11/5/2011	285 Napa Road	900	0	0	Street/curb and gutter; ditch	NOT APPLICABLE²	Grease deposition (FOG)	No
10/28/2011	10/28/2011	18878 Railroad Ave	220	0	220	Separate storm drain; Street/curb and gutter	Verano Creek	Grease deposition (FOG)	No
3/26/2011	3/26/2011	37 Meadowbrook	525	0	525	Street/curb and gutter; Surface water; Unpaved surface	Agua Caliente Creek	Other – Heavy rains causing flooding and I&I, overwhelming system	No
3/26/2011	3/26/2011	712 OMAN SPRINGS Ct	1800	0	1800	Street/curb and gutter; Surface water	Sonoma Creek	Rainfall exceeded design	No
3/24/2011	3/24/2011	712 Oman Springs Ct	805	0	805	Separate storm drain; Street/curb and gutter; Surface water	Sonoma Creek	Other – Heavy rains causing flooding and I&I, overwhelming system	No
3/20/2011	3/20/2011	21774 Splude Rd	2250	0	2250	Surface water; Unpaved surface	Nathanson Creek	Rainfall exceeded design	No
3/20/2011	3/20/2011	712 Oman Spring Ct	4575	0	4575	Separate storm drain; Street/curb and gutter; Surface water	Sonoma Creek	Flow exceeded capacity	No
12/29/2010	12/29/2010	Arkay & Solano Ave	50	0	0	Street/curb and gutter	NOT APPLICABLE²	Other – Unknown	No
12/29/2010	12/29/2010	21694 Splude Rd Easement	1000	0	1000	Surface water; Unpaved surface	Nathanson Creek (potentially)	Rainfall exceeded design	No

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Start Date	End Date	Spill Location	Gallons Discharged	Gallons Recovered	Gallons Reached Surface Water	Final Spill Destination	Impacted Surface Water	Cause ¹	Same SSO Location cited in 2011 ACLO
12/29/2010	12/29/2010	598 Bokman	500	0	500	Separate storm drain; Street/curb and gutter; Surface water	Sonoma Creek	Rainfall exceeded design	Yes
12/29/2010	12/29/2010	17324 Sonoma Hwy	17875	0	17875	Separate storm drain; Street/curb and gutter; Surface water	Sonoma Creek	Rainfall exceeded design	Yes
12/29/2010	12/29/2010	18715 Sonoma Hwy	2248	0	2248	Street/curb and gutter; Surface water	Agua Caliente Creek	Rainfall exceeded design	No
12/28/2010	12/29/2010	100 Vailetti Dr.	5560	0	5560	Separate storm drain; Street/curb and gutter; Surface water	Sonoma Creek	Rainfall exceeded design	Yes
12/28/2010	12/29/2010	4th St East/ East Spain St.	3150	0	3150	Separate storm drain; Street/curb and gutter; Surface water	Nathanson Creek	Rainfall exceeded design	Yes
12/20/2010	12/20/2010	Meadowbrook Trailer Park	2400	0	2400	Surface water	Agua Caliente Creek	Other – Surcharged pipe caused backup into private lateral	No

Legend to Table

- 1 There are a total of 52 SSOs. The 39 capacity-related SSOs are those SSOs with a cause attributable to the following: Flow exceeded capacity; Other – Severe storm causing flooding and I&I; Other – Due to flooding and I&I, system overwhelmed; Other – Heavy rains causing flooding, overwhelming system; Rainfall exceeded design. Also, the 11 blockage-related SSOs are shaded in gray.
- 2 The six SSOs that did not discharge to surface water are **in bold print**.
- 3 Administrative Civil Liability Order R2-2011-0021