

Lucille's Notice of Violation Appeal

South Placer Municipal Utility District



February 1, 2024

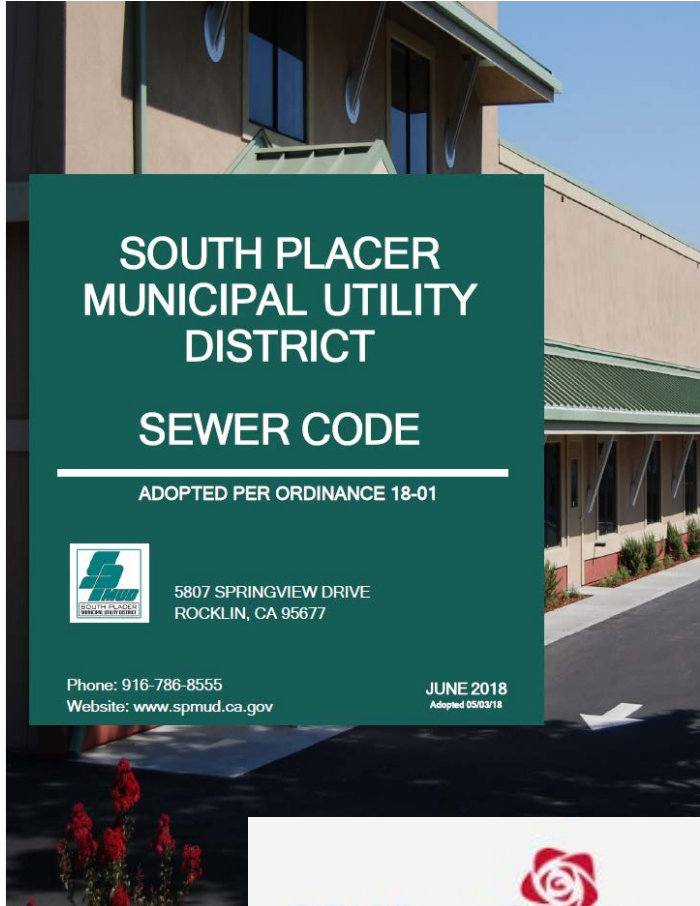
District Objectives



Protect public health and the water environment.

Fats, Oils and Grease (FOG) Program

- Proper installation and maintenance of grease control devices
- Pumping frequencies
- Kitchen best management practices



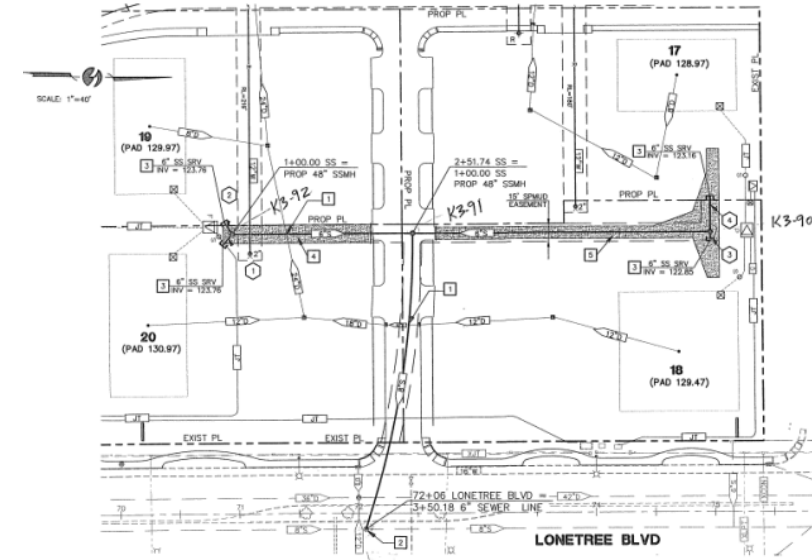
Sewer Code/ City of Roseville Municipal Code

FOG discharges that cause an SSO, accumulate and contribute to blockages in the public sewer, or exceed the following discharge limitations are prohibited:

- ❖ pH below 5.5 or higher than 9.0
- ❖ Fats, Oils and Grease greater than 100 milligrams per liter

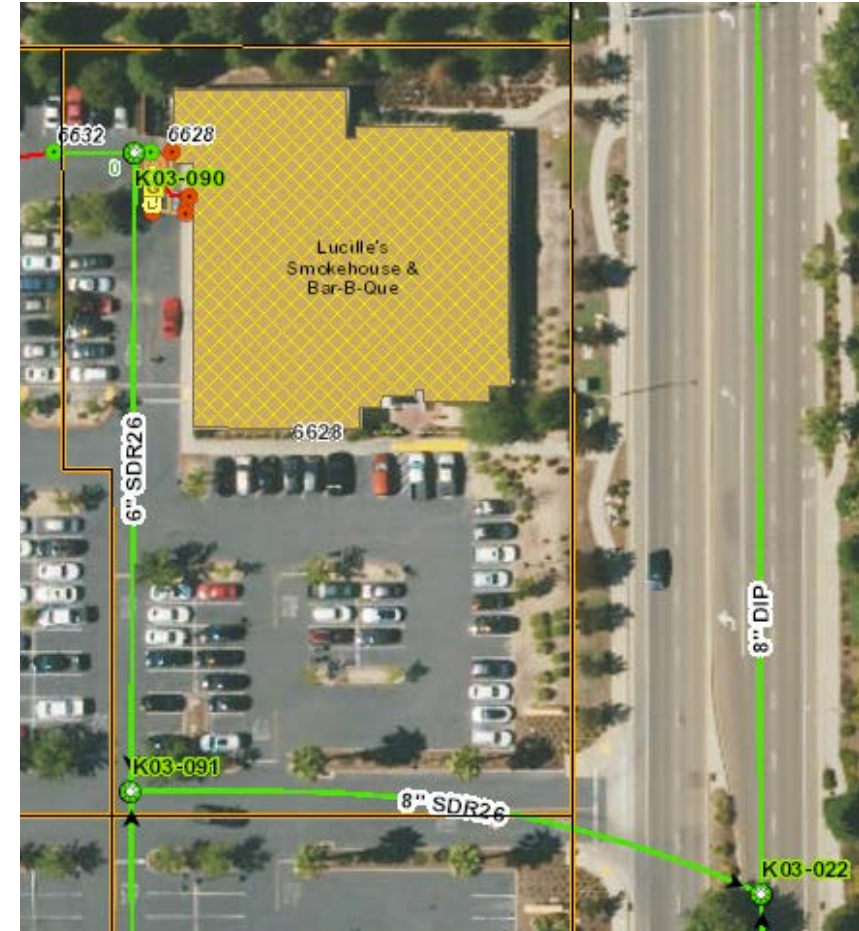
Lucille's History

- June 2006: Blue Oaks Town Center sewer improvements accepted by the District
- Sept. 2018: Notice of Violation (NOV) issued based on core sample results
- Sept. 2018 to Nov. 2019: Multiple work orders outside of normal maintenance activities
- Nov. 2019: NOV requirements completed
- Nov. 2019 to March 2023: Work orders for normal maintenance activities
- February 2023: Deteriorated pipe discovered during routine condition assessment
- April 2023: NOV issued based on evidence of FOG, deterioration of downstream pipe and results from effluent testing
- May 2023: District declared emergency project and replaced downstream sewer pipe (\$320,180)



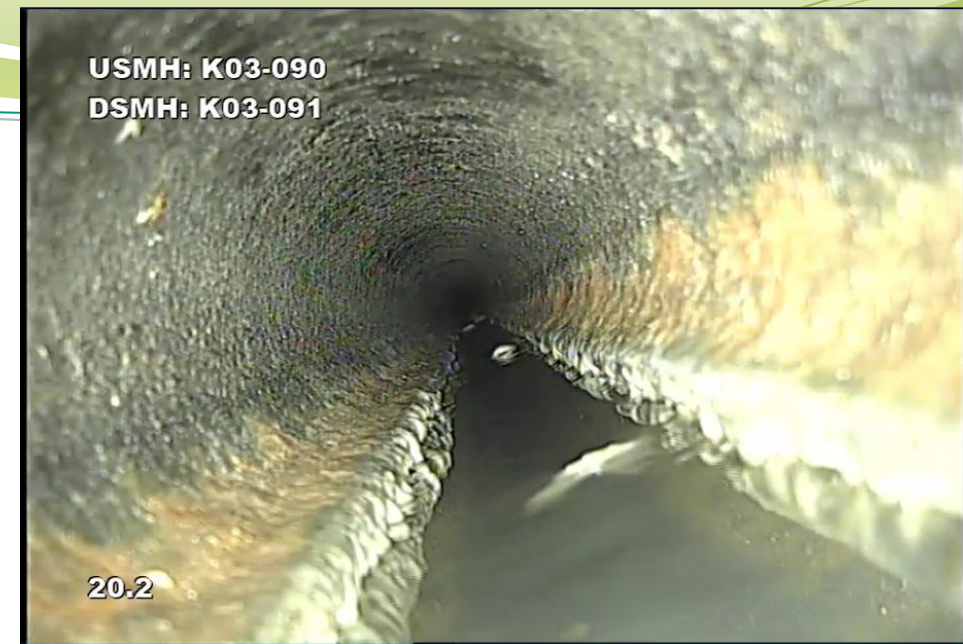
Work Orders (since 2018)

- 9/10/18: Call out – stoppage
- 9/10/18: Hydro-cleaning AND CCTV inspection
- 12/5/18: Hydro-cleaning
- 5/18/19: Call out – PLSD (private sewer lateral sewer discharge)
- 8/1/19: Rehabilitation – channel/bench work inside manhole (K03-090)
- 12/10/19: Install/construct locking composite lid (K03-090) to prohibit debris (utensils, plates and skewers) from entering the sewer system



Notice of Violation (2023)

- 2/13/23: Routine CCTV indicated excessive grease; scheduled a follow up cleaning via high pressure jetting and vacuum.
- 3/14/23: District crews attempted to clean the public sewer downstream of Lucille's but the nozzle got stuck.
- 3/20/23: District and City of Roseville met onsite to inspect the grease interceptor. SwiftComply records indicated that the GI was pumped on 3/16/23. Effluent samples collected and sent to CALTEST. pH tested at 4.03, which is a prohibited discharge. Staining and evidence of private sanitary sewer overflow observed.
- 4/5/23: CALTEST results of oil and grease was 101 milligrams/liter which exceeds local limits.
- 4/6/23: District's Board approved an emergency contract to replace the pipe.
- 4/14/23: NOV issued to Lucille's.
- 11/13/23: Stipulation and Administrative Order issued.



Grease accumulation downstream of Lucille's – CCTV on February 13, 2023



Inspection Results (January 10, 2024)



Apparent private sanitary sewer overflow originating from the Lucille's cleanout and draining to the storm drain inlet.



CCTV Inspection – January 17, 2024

9 months after new pipe installation

USMH: K03-090
DSMH: K03-091



1.3 feet downstream from manhole K03-090

USMH: K03-090
DSMH: K03-091



209.6 feet downstream from manhole K03-090

Recommendation

Deny the appeal and affirm the requirements outlined in the Stipulation and Administrative Order based upon the following findings:

1. Excessive grease accumulation has been observed in the new pipeline downstream of Lucille's; and
2. The existing grease interceptor is failing to control or mitigate fats, oils and grease in the effluent.
3. These are violations of the District's Sewer Code and the City of Roseville's Municipal Code.
4. The CCTV inspection on January 17, 2024, indicates that frequent ongoing cleaning and inspection of the sewer lines downstream of Lucille's will be required to prevent a sanitary sewer overflow (SSO).

Lucille's Sewer Layout

