

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

TAMPA BAY WATERKEEPER, OUR
CHILDREN’S EARTH FOUNDATION
and SUNCOAST WATERKEEPER,

Plaintiffs,

v.

CITY OF LARGO, FLORIDA,

Defendant

Civil Case No. 8:20-cv-1742

**COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF AND CIVIL
PENALTIES**

Tampa Bay Waterkeeper (“TBWK”), Our Children’s Earth Foundation (“OCE”) and Suncoast Waterkeeper (“SCWK”), (collectively, “Plaintiffs”), by and through their counsel, hereby allege as follows:

I. JURISDICTION AND VENUE

1. This is a civil suit brought under the citizen suit enforcement provision of the Federal Water Pollution Control Act, 33 U.S.C. §§ 1251, et seq. (“Clean Water Act” or “CWA”) (see 33 U.S.C. § 1365). This Court has subject matter jurisdiction over the parties and this action pursuant to Section 505(a)(1) of the Clean Water Act, 33 U.S.C. § 1365(a)(1), and 28 U.S.C. §§ 1331 and 2201 (an action for declaratory and injunctive relief arising under the Constitution and laws of the United States).

2. On May 29, 2020, Plaintiffs issued a sixty (60) day notice letter (“Notice Letter”) to the City of Largo (“Defendant” or the “City”). The Notice Letter informed the City of its violations of the Clean Water Act and of Plaintiffs’ intention to file suit against the City. The Notice Letter was sent to the Administrator of the United States Environmental Protection Agency (“EPA”), the Administrator of EPA Region IV, and the Secretary of the Florida Department of Environmental Protection (“FDEP”) as required by Section 505(b)(1)(A) of the Clean Water Act, 33 U.S.C. § 1365(b)(1)(A). The Notice Letter was also sent to the Executive Director of the Southwest Florida Water Management District (“Regional District”).

3. More than sixty (60) days have passed since the Notice Letter was issued to the City and the state and federal agencies.

4. Plaintiffs are informed and believe, and thereon allege, that neither EPA nor the state of Florida has commenced or is diligently prosecuting an action to redress the violations alleged in the Notice Letter and in this Complaint under Section 505(b)(1)(B) of the Clean Water Act, 33 U.S.C. § 1365(b)(1)(B). This action is not barred by any prior administrative penalty matter issued under Section 309(g) of the Clean Water Act, 33 U.S.C. § 1319(g). Accordingly, because the requirements of 33 U.S.C. § 1365(b)(1)(B) have been met, this matter may be commenced.

5. The venue is proper in the Middle District of Florida, Tampa Division, pursuant to Section 505(c)(1) of the Clean Water Act, 33 U.S.C. § 1365(c)(1), because the source of the violations is located within this judicial district, specifically within Pinellas County.

II. INTRODUCTION

6. Plaintiffs allege the following violations of the Clean Water Act: (1) violations of the *State of Florida Domestic Wastewater Facility Permit* National Pollutant Discharge Elimination System (“NPDES”) Permit No. FL0026603 (“NPDES Permit”) (Causes of Action One and Four); (2) discharges of pollutants to waters of the United States without an NPDES Permit authorization in violation of Section 301(a) of the Clean Water Act 33 U.S.C. §1311(a) (Cause of Action Two); and (3) violations of the *State of Florida Municipal Separate Storm Sewer System Permit*, NPDES Permit Nos. FLS000005-003 and FLS000005-004 (collectively, “MS4 Permits”) (Cause of Action Three). The City’s violations of the Clean Water Act, its MS4 Permits and its NPDES Permit are ongoing and continuous.

III. PARTIES AND BACKGROUND

A. Plaintiffs

1. Tampa Bay Waterkeeper

7. TBWK is a Florida non-profit public benefit corporation with members throughout Tampa Bay, including Pinellas County. TBWK is dedicated to protecting and improving the Tampa Bay watershed while ensuring swimmable, drinkable and fishable water for all. TBWK’s approach combines sound science, policy advocacy, grassroots community engagement and education to stand up for clean water together as a community, ensuring a clean and vibrant future for the Tampa Bay watershed. To further its mission, TBWK actively seeks federal and state implementation of the Clean Water Act, and, where necessary, directly initiates enforcement actions on behalf of itself and its

members. TBWK is based in Pinellas County and has been registered as a non-profit corporation in Florida since 2017. TBWK is a licensed member of Waterkeeper Alliance, Inc., an international non-profit environmental organization, made up of over 300 separate Waterkeeper programs, such as TBWK.

8. TBWK represents its members in and around Pinellas County who have personally suffered harm to their aesthetic, recreational, and employment-related interests due to the City's illegal discharges of wastewater effluent into Old Tampa Bay in violation of the City's NPDES Permit limits and the City's sanitary sewer overflows ("SSOs") (*i.e.*, the unauthorized discharge of raw sewage, partially treated sewage, or treated reclaimed water) into Old Tampa Bay, Cross Bayou, Lake Seminole, McKay Creek, Seminole Bypass Canal, Clearwater Harbor, Allen Creek, Church Creek, Rattlesnake Creek, Long Bayou, Boca Ciega Bay, Tampa Bay, the Gulf of Mexico, and other water bodies, streams, or tributaries in or adjoining the City (collectively, "Receiving Waters"), which are all waters of the United States. TBWK members use those waters for boating, fishing, wading, body contact water sports and other forms of recreation, wildlife observation, aesthetic enjoyment, educational study, and spiritual contemplation.

9. TBWK members include residents of Largo and Pinellas County who reside in the vicinity of the waters directly impacted by the City's violations and who have reasonably founded fears that the pollutants contained in the City's SSOs, the excessive nutrient loading to Old Tampa Bay in violation of the City's NPDES Permit effluent limits, and the City's exceedances of other NPDES Permit limitations have and

will continue to contribute to poor water quality in the Receiving Waters that may be dangerous to human health and the environment. TBWK members also include: (1) residents of the communities that border Tampa Bay who have reasonably founded fears that the excessive nitrogen contained in the City's discharges of raw, partially treated and/or treated reclaimed water cause or exacerbate harmful algal blooms ("HABs") and the decline in abundance and distribution of seagrasses, both of which negatively impact the entire estuary; (2) commercial and charter fishermen who depend upon the ecological health of Tampa Bay for their livelihood, individuals who own and operate businesses in the tourism and marine service industries located within Pinellas County, whose businesses are adversely impacted by the City's illegal discharges and by public perception of poor water quality in Pinellas County; and (3) individuals who devote their time to Tampa Bay cleanup efforts, restoration of seagrass, and participation in wildlife patrols during nesting or hatching season. TBWK members conduct nature surveys and studies, and photograph wildlife in and around affected waterways. TBWK members contact the affected waters directly when they perform maintenance work on boats, participate in body-contact water sports, or participate in organized trash cleanups and seagrass restoration work along the shoreline.

2. Our Children's Earth Foundation

10. OCE is a non-profit public benefit corporation with members throughout the United States, including Tampa Bay and specifically, Pinellas County. OCE's mission is to promote public awareness of domestic and international human rights issues and environmental impacts through education, art, and private enforcement actions for

the benefit of children and other populations who are the most vulnerable to pollution. OCE seeks to prevent environmental damage wherever possible and ensure that appropriate environmental protection statutes are being followed. Throughout its 20-year history, OCE has regularly initiated environmental enforcement actions on behalf of itself and its members. OCE has been registered as a non-profit corporation in Florida since 2016.

11. Since 2016, OCE has focused on its environmental enforcement activities related to water quality in Florida. OCE members in Pinellas County have repeatedly requested that OCE take legal action to effectively address water pollution problems in their communities, as well as sources of pollution that exacerbate HABs. OCE members have expressed concern and fear regarding their exposure to raw and partially-treated sewage pollution, as well as the impacts of nutrient pollution to waters in Tampa Bay, including to the Receiving Waters.

12. OCE members have expressed frustration that local and state officials have failed to adequately address the City's polluting of the Receiving Waters, despite recurring HABs and raw and partially-treated sewage releases that impact members' businesses, recreational activities, and quality of life.

13. OCE members in and around Pinellas County have personally suffered harm to their aesthetic, recreational, and employment-related interests due to City's unauthorized discharges of raw or inadequately treated sewage and/or reclaimed water into the Receiving Waters. Members of OCE use those waters to regularly participate in

boating, fishing, wading, body contact water sports and other forms of recreation, wildlife observation, aesthetic enjoyment, educational study, and spiritual contemplation.

3. Suncoast Waterkeeper

14. SCWK is a Florida non-profit public benefit corporation with members throughout Southwest Florida, including Pinellas County. SCWK is dedicated to protecting and restoring the Florida Suncoast's waterways through fieldwork, advocacy, environmental education, and enforcement, for the benefit of the communities and SCWK's members who rely upon these precious coastal resources. SCWK aims to protect local waterways for use for water contact recreation, aesthetic enjoyment, fishing, wildlife observation, educational study, and spiritual contemplation. To further its mission, SCWK actively seeks federal and state implementation of the Clean Water Act, and, where necessary, directly initiates enforcement actions on behalf of itself and its members. Pinellas County waterways and communities are included in SCWK's area of operation. SCWK has been registered as a non-profit corporation in Florida since 2012 and has maintained its good and current standing in Florida since that time. Like TBWK, SCWK is a licensed member of Waterkeeper Alliance, Inc.

15. SCWK represents its members in and around Largo and Pinellas County who have personally suffered harm to their aesthetic, recreational, and employment-related interests due to the City's illegal discharges of wastewater effluent into Old Tampa Bay in violation of the City's NPDES Permit limits and the City's SSOs into the Receiving Waters. SCWK members enjoy those waters for boating, fishing, wading,

body contact water sports and other forms of recreation, wildlife observation, aesthetic enjoyment, educational study, and spiritual contemplation.

16. SCWK members include residents of Largo and Pinellas County who reside in the vicinity of the waters affected by the City's violations and who have reasonably founded fears that the pollutants contained in the City's SSOs, the excessive nutrient loading to Old Tampa Bay in violation of the City's NPDES Permit effluent limits, and the City's exceedances of other NPDES Permit limitations have and will continue to contribute to poor water quality in the Receiving Waters that may be dangerous to them and human health and the environment. SCWK members also include: (1) residents of the communities that border Tampa Bay who have reasonably founded fears that the excessive nitrogen contained in the City's discharges of raw, partially treated and/or treated reclaimed water cause or exacerbate HABs and the decline in abundance and distribution of seagrasses, both of which negatively impact the entire estuary; (2) commercial and charter fishermen who depend upon the ecological health of Tampa Bay for their livelihood, individuals who own and operate businesses in the tourism and marine service industries located within Pinellas County, whose businesses are adversely impacted by the City's illegal discharges and by public perception of poor water quality in Pinellas County; and (3) individuals who devote their time to Tampa Bay cleanup efforts, restoration of seagrass, and participation in wildlife patrols during nesting or hatching season. SCWK members conduct nature surveys and studies, and photograph wildlife in and around the affected waterways. SCWK members contact the affected waters directly when they perform maintenance work on boats, participate in

body-contact water sports, or participate in organized trash cleanups and seagrass restoration work along the shoreline.

17. The City's illegal discharges of pollutants degrade water quality and harm aquatic life in the Receiving Waters, and thus threaten or impair each of the uses described above or contribute to such threats and impairments, ultimately impairing Plaintiffs' members' use and enjoyment of these waters.

18. The City's illegal discharges of pollutants threaten or impair each of the uses described above or contribute to such threats and impairments. Thus, the interests of Plaintiffs' members have been, are being, and will continue to be adversely affected by the City's failure to comply with its NPDES and MS4 Permits and the Clean Water Act. The relief sought herein will redress the harms to Plaintiffs' members caused by the City's illegal conduct. Continuing commission of the acts and omissions alleged herein will irreparably harm Plaintiffs' members, for which harm they have no plain, speedy, or adequate remedy at law.

19. Plaintiffs bring this action on behalf of their members to address and remedy the injuries in fact suffered by these members as a result of the City's illegal discharges described above. The interests of Plaintiffs' members at stake are germane to the purposes for which TBWK, OCE, and SCWK have been created. Plaintiffs' organizational purposes all include protecting surface waters from pollution and degradation to promote their members' and the public's abilities to use surface waters for

water contact recreation, aesthetic enjoyment, fishing, wildlife observation, educational study, and spiritual contemplation.

B. Defendant

20. The City is a municipality incorporated under the laws of the state of Florida and a person within the meaning of Section 403.031(5), Fla. Stat., and Section 502(5) of the Clean Water Act. 33 U.S.C. § 1262(5).

21. The City is a “person” within the meaning of Section 502(5) of the Clean Water Act, 33 U.S.C. § 1362(5).

1. The City’s Sewage Collection and Treatment System

22. The City holds NPDES Permit No. FL0026603, issued by FDEP for the Largo Wastewater Treatment Facility (“WWTF” or “Largo WWTF”).

23. The City owns and operates the Largo WWTF, and appurtenant sewage wastewater collection and treatment system (“WCTS”) which collectively constitute a publicly owned treatment works (“POTW”) as defined in Section 212(2) of the CWA, 33 U.S.C. § 1292(2), and 40 C.F.R. Section 125.58(s). The POTW collects and treats sanitary sewage from the City’s residents and businesses.

24. All wastewater collected within Largo is transported to the WWTF through the WCTS. The WWTF is located at 5100 150th Ave N, Clearwater, FL 33760 in Pinellas County. It is an 18.0 million gallons per day (“MGD”) annual average daily flow (“AADF”) Type I domestic advanced wastewater treatment facility, using a high-rate three-stage biological nutrient removal process, commonly referred to as the A20 Process. The treated wastewater effluent from the WWTF is either (1) distributed to a

“Master Reuse System” for land application within the City, the Carillon area and within the City of St. Petersburg, or (2) discharged through an outfall to the stormwater system within Feather Sound and thence to Tampa Bay.

25. The point of discharge of effluent from the Largo WWTF is Surface Water Discharge D-001, which is a 30” diameter, reinforced concrete pipe that discharges effluent from the WWTF as described in the NPDES Permit: “An existing 15.0 MGD [AADF] discharge to an unnamed ditch, that is part of the stormwater system within Feather Sound, into the Class III Fresh waters of Roosevelt Basin, WBID 1624A. Roosevelt Basin flows into WBID1558H, Class II Marine waters of Old Tampa Bay, at Discharge Location D-001, which is at a depth of approximately 2 feet. The point of discharge is located approximately at latitude 27°53’ 52” N, longitude 82°40’ 13” W.”

26. The City owns and operates the WCTS which consists of 294 public miles of collection and transmission lines, including 240 miles of gravity pipes, 30 miles of force mains, 21 miles of interceptor pipes, and 3 miles of discharge effluent lines. There are 52 wastewater lift stations throughout the wastewater collection system and over 5,400 manholes. The City is also responsible for the lower portion of lateral lines from the City’s mainline connection to the property line. Additionally, there are over 300 private collection systems consisting of all the assets commonly found in a sanitary sewer collection system, including lateral and main pipes, manholes, and 164 pump stations; these private systems are conveyed to the Largo WWTF.

2. The City's Municipal Separate Storm Sewer System

27. The City's municipal separate storm sewer system ("MS4") contains numerous storm drain inlets that lead to underground storm drain pipes, which discharge into the Receiving Waters. The portion of the MS4 within the City's political boundaries serves the areas also served by the WCTS.

28. The City is the owner and operator of the portions of the MS4 within its political boundaries under MS4 Permit Nos. FLS000005-03 and FLS000005-04.

C. The Local Waterways that Receive the City's Illegal Discharges and the Environmental Impacts from those Discharges

29. The WWTF and WCTS are located in watersheds that drain to the Receiving Waters. The storm pipes in the MS4 owned and operated by the City also discharge into these waters.

30. SSOs from the WWTF and WCTS, as well as SSOs that enter the MS4 from the WWTF and WCTS and/or from privately-owned lateral lines, are discharged to the Receiving Waters.

31. Effluent discharged from Surface Water Discharge D-001 flow directly through the stormwater system within Feather Sound and then to Old Tampa Bay.

32. The Receiving Waters are waters of the United States, and/or have a significant nexus to waters of the United States, and thus are navigable waters as defined by the Clean Water Act and controlling authority.

33. Tampa Bay is the largest open-water estuary in Florida, encompassing nearly 400 square miles, including numerous smaller bays and waterways and bordering three counties—Hillsborough, Manatee and Pinellas. Tampa Bay's watershed covers a

land area of 2,200 square miles. Tampa Bay is an ecologically sensitive water body and a defining feature of Southwest Florida. Tampa Bay is an important and heavily used resource, with special aesthetic and recreational significance for people living in the surrounding communities. The Tampa Bay shoreline has numerous highly valued beaches and points of public access that offer unique recreation opportunities for swimmers, kayakers, paddleboarders, windsurfers, sport fishers, and other recreational users. Included amongst Tampa Bay's prized resources are specially recognized and protected waterways, such as the Boca Ciega Bay Aquatic Preserve and the Pinellas County Aquatic Preserve. The Boca Ciega Bay Aquatic Preserve runs along the southwest coastline of the county and the remainder of the sovereign submerged lands in Pinellas County, including those in and around the City, comprise the Pinellas County Aquatic Preserve. These two Aquatic Preserves are designated as "Outstanding Florida Waters," pursuant to 62-302.400 F.A.C., and are afforded special significant protection because of their natural attributes.

34. SSOs harm the Receiving Waters and pose a serious risk to fisheries, wildlife habitat, and human health. SSOs contain human waste, viruses, protozoa, mold spores and bacteria that are known pathogens that cause disease in humans and wildlife. SSOs also contain chemicals that cause cancer or reproductive toxicity in humans and wildlife. These chemicals come from solvents, detergents, cleansers, inks, pesticides, paints, pharmaceuticals, and other chemicals used by households and businesses and then discarded to sewage collection systems.

35. SSOs further contain nutrients that increase the frequency, severity and duration of HABs that are toxic to humans, fish, shellfish, marine mammals and birds and are linked to a variety of illnesses in people and animals. HABs in Tampa Bay and nearshore Gulf of Mexico waters have been manifested by massive fish kills, benthic invertebrate die offs and unusually high mortality rates of sea turtles and marine mammals.

36. HABs in Tampa Bay include the toxic phytoplankton species *Pyrodinium bahamense*, *Pseudo-nitzschia*, *dinoflagellate Karlodinium* and likely contribute to Red Tide (*Karenia Brevis*) blooms. Toxins found in HABs, including the potent saxitoxin found in *Pyrodinium bahamense*, are responsible for acute human illness and linked to neurodegenerative illness such as Amyotrophic Lateral Sclerosis and Parkinson's disease.

37. *Pyrodinium bahamense* persists in Old Tampa Bay, which directly receives the City's effluent from Surface Water Discharge D-001. *Pyrodinium bahamense* contributes to a large magnitude chlorophyll-a exceedance of FDEP regulatory criteria for chlorophyll-a concentrations that has persisted for at least the last five years. (2019 Tampa Bay Water Quality Assessment. 2020. Technical Report #01-20 of the Tampa Bay Estuary Program. Prepared by the Tampa Bay Estuary Program (M. Beck, M. Burke & G. Raulerson)). The Florida Fish and Wildlife Research Institute's HAB group is monitoring and studying HABs in Old Tampa Bay.

38. Besides the direct water and airborne pathways of toxic exposure to humans and wildlife, impacts secondary to fishkills can include skin and respiratory irritation in sensitive members of the human population. The fish kills associated with

HABs can cause eyesores and noxious odor conditions associated with dead and decaying fish, making waters unfit for recreational use, aesthetic enjoyment, or spiritual contemplation.

39. SSOs that discharge into the Receiving Waters result in the addition of the pollutants described above (*i.e.*, pathogens, nutrients, chemicals, and various toxins). The intensive use of the Receiving Waters for commercial and sport fishing, shellfish harvesting, and water-contact recreation increases the likelihood that people will come into direct contact with SSOs and the pollutants they contain. SSOs also affect people who eat fish and bivalves caught and harvested in these waters. Toxic chemicals and neurotoxins bio-accumulate in the affected waters' food webs; *i.e.*, contaminants absorbed by plankton accumulate in fish and birds farther up the food chain, and ultimately transfer in higher doses to human consumers.

40. Old Tampa Bay, which directly receives the discharge of the City's effluent from Surface Water Discharge D-001, is suffering from excessive pollution and is designated as an impaired water body. A water body that is designated as impaired cannot support its designated beneficial uses. The beneficial uses of Old Tampa Bay include recreation, and propagation and maintenance of a healthy, well balanced population of fish and wildlife. Portions of Old Tampa Bay are designated to support shellfish propagation or harvesting. Numerous segments of Old Tampa Bay are listed on the State of Florida's Statewide Comprehensive Verified List of Impaired Waters ("State List") and submitted to the Environmental Protection Agency for inclusion in the CWA

Section 303(d) list of impaired water bodies (“Federal List”) as impaired by Bacteria (in several different forms), Biochemical Oxygen Demand and Nutrients.

41. Tampa Bay, and in particular Old Tampa Bay, has a significant nitrogen pollution problem. Between 1950 and 1988, an estimated 42% of the seagrass acreage in Tampa Bay was lost primarily through excess nitrogen loading and related increases in phytoplankton concentrations, causing light limitation for seagrass survival and growth. Since the late 1980s, Tampa Bay has seen significant recovery of seagrass population through substantial financial investments. Seagrasses are an essential part of the estuarine ecosystem as they provide food and habitat for aquatic animals, filter water, reduce erosion, and anchor sediment. Additionally, juvenile survival rates are much higher for fish and other marine life in areas where seagrasses have been maintained and restored. However, Old Tampa Bay, particularly Feather Sound, where the City of Largo discharges its treated effluent, has seen poor recovery and decline in its seagrass acreage in recent years relative to the rest of the Tampa Bay estuary. SSOs and in particular the nutrients contained within the City’s discharges contribute to the decline in abundance and distribution of seagrasses in Old Tampa Bay and impair seagrass recovery in the broader Tampa Bay estuary.

42. The City’s persistent NPDES Permit exceedances for TN has likely been a major contributor to persistent HABs in Old Tampa Bay and related chlorophyll-A exceedances, and helps explain the failure to attain the FDEP-established thresholds for chlorophyll-A in 2015, 2017, and 2019 set forth in the Tampa Bay Estuary Reasonable Assurance Plan (“RAP”). The RAP was developed by the Tampa Bay Estuary Program

(TBEP) and members of the Tampa Bay Nitrogen Management Consortium in cooperation with EPA, DEP and other Tampa Bay regional stakeholders. FDEP approved the RAP on December 10, 2010, under Section 403.067, F.S., and 62-303.600 (F.A.C.), consistent with Section 303(d) of the Clean Water Act.

43. High levels of Nitrogen in the effluent from the City's Surface Water Discharge D-001 is a significant contributor to poor water quality, HABs, and seagrass declines. The City's failure to meet its permit requirements fetters the collaborative efforts of stakeholders throughout the region towards seagrass recovery and water quality improvement.

44. The Cross Bayou Canal is impaired for dissolved oxygen, enterococci, mercury, nutrients (chlorophyll-A), and TN and is included in the State List and Federal List for impaired waters regarding those pollutants. The water quality of Cross Bayou Canal does not support its designated beneficial uses, including recreation, propagation, and maintenance of a healthy, well balanced population of fish and wildlife. Cross Bayou Canal connects Old Tampa Bay to Long Bayou, which is on the State List and Federal List as impaired for fecal coliform and mercury, and unable to support its designated beneficial uses. Long Bayou connects to and subsequently flows into Boca Ciega Bay, Tampa Bay and the Gulf of Mexico.

45. By illegally discharging SSOs (*i.e.*, the unauthorized discharge of raw sewage, partially treated sewage, or treated reclaimed water), into the MS4, Old Tampa Bay, Cross Bayou, Lake Seminole, McKay Creek, Seminole Bypass Canal, Clearwater Harbor, Allen Creek, Church Creek, Rattlesnake Creek, Long Bayou, Boca Ciega Bay,

Tampa Bay, the Gulf of Mexico in or adjoining Largo and Pinellas County, and by persistently exceeding its NPDES Permit effluent limits for discharges into Old Tampa Bay, the City contributes to the continuing impairment of these waters. As such, the City's violations of the Clean Water Act directly harm Plaintiffs' members' use and enjoyment of the above mentioned waters by: (1) loading these waters with pathogens and thus leading these members to have well-founded fears that engaging in water contact recreation in these waters has risked or would risk making them or their family members ill, (2) loading these waters with nutrients that have likely exacerbated HABs, fish kills, and conditions noxious to these members' use and enjoyment of these waters and/or that have led these members to have well-founded fears of the worsening of HABs in these waters, (3) loading these waters with various toxic chemicals leading these members to have well-founded fears that they would be harmed if they engaged in water contact recreation or fishing in these waters, and (4) loading these waters with various toxic chemicals leading these members to have well-founded fears that wildlife they enjoy viewing is at risk of harm due to contamination of these waters.

46. Members of the Plaintiff organizations have suffered injuries in fact caused by the City's illegal discharges and NPDES Permit violations because the City's illegal discharges of raw and partially treated sewage, and treated effluent to Receiving Waters have reached and directly contaminated waters that Plaintiffs' members use for body-contact water sports, fishing, boating, and other activities, causing Plaintiffs' members to lessen the frequency and enjoyment of their activities in and around the affected waters.

IV. STATUTORY AND LEGAL REQUIREMENTS

A. The Clean Water Act

47. Section 301(a) of the Clean Water Act, 33 U.S.C. § 1311(a), prohibits the discharge of a pollutant by any person to waters of the United States, except, *inter alia*, in compliance with a National Pollutant Discharge Elimination System (“NPDES”) permit issued pursuant to Section 402 of the Clean Water Act, 33 U.S.C. § 1342.

48. Section 502(6) of the CWA, 33 U.S.C. § 1362(6), defines “pollutant” to include, *inter alia*, sewage, sewage sludge, biological material and industrial, municipal and agricultural waste.

49. Section 502(12) of the CWA, 33 U.S.C. § 1362(12), defines “discharge of a pollutant” to include “any addition of any pollutant to navigable waters from any point source.”

50. Section 502(14) of the CWA, 33 U.S.C. § 1362(14), defines “point source” as “any discernible, confined and discrete conveyance, including but not limited to any pipe, ditch, channel, tunnel, conduit, well [or] discrete fissure.”

51. Section 402 of the CWA, 33 U.S.C. § 1342, provides that the permit-issuing authority may issue an NPDES permit that authorizes the discharge of any pollutant to waters of the United States, upon the condition that such discharge will meet all applicable requirements of the CWA and such other conditions as the permitting authority determines necessary to carry out the provisions of the CWA.

52. The State of Florida has been authorized by EPA to issue NPDES permits.

53. Pursuant to Section 402 of the Clean Water Act, 33 U.S.C. § 1342, and Chapter 403, Florida Statutes (F.S.) and applicable rules of the Florida Administrative Code (F.A.C.), FDEP issued NPDES Permit No. FL0026603 to the City.

54. The City is required to comply with its NPDES Permit with respect to discharges from the POTW or its collection system, and the manner in which it operates and maintains the POTW.

55. Section 402(p) of the Clean Water Act, 33 U.S.C. § 1342(p), requires an NPDES permit for municipal stormwater discharges. The stormwater element of the federal NPDES Program is mandated by Section 402(p), 33 U.S.C. § 1342(p), and implemented through federal regulations, including 40 C.F.R. Section 122.26. EPA has approved the FDEP to administer the stormwater NPDES permit program in Florida. FDEP is authorized under Section 403.0885 of the Florida Statutes (F.S.) and Rule 62-624 of the Florida Administrative Code (F.A.C.) to implement the stormwater NPDES Program.

56. An MS4 is defined as “a conveyance or system of conveyances (including roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, man-made channels, or storm drains)” owned or operated by a state, city, or town that is designed or used for collecting or conveying storm water and that discharges to waters of the United States. *See* 40 C.F.R. §§ 122.26(b)(8)(i)–(iv); *see also* 40 C.F.R. § 122.26(b)(18).

57. As part of the stormwater program, FDEP has determined that an MS4 permit is required for the operation of the Pinellas County’s stormwater systems.

Pursuant to Section 402 of the Clean Water Act, 33 U.S.C. § 1342, and Chapter 403, Florida Statutes (F.S.) and applicable rules of the Florida Administrative Code (F.A.C.), FDEP issued MS4 Permit No. FLS000005-004 for Pinellas County with an issuance date of July 1, 2018 and expiration date of June 30, 2023. The previous MS4 Permit (MS4 Permit No. FLS000005-003) was issued effective January 1, 2013 with an expiration date of December 31, 2017.

58. The City is responsible for operating and maintaining the MS4 within its political boundaries, tasks which include, but are not limited to, preventing the discharge of non-stormwater (i.e., any substances other than stormwater including but not limited to sewage or re-use water) into the MS4.

59. Any violation of the NPDES Permit or the MS4 Permits is a violation of the Clean Water Act. *See* 40 C.F.R. § 122.41(a) (2001).

60. Any unauthorized discharge of a pollutant is a violation of the Clean Water Act under Section 301(a) of the Clean Water Act, 33 U.S.C. § 1311(a).

61. Section 505(a) of the Clean Water Act provides for citizen enforcement actions against any “person,” for violations of (1) any effluent standard or limitation or (2) an order issued by the Administrator or a State with respect to such a standard or limitation. *See* 33 U.S.C. §§ 1365(a), 1365(f), 1362(5).

62. Section 505(a) of the Clean Water Act, 33 U.S.C. § 1365(a), authorizes an action for injunctive relief. Each separate violation of the Clean Water Act subjects the violator to an assessment of civil penalties pursuant to the Clean Water Act sections 309(d) and 505(a), 33 U.S.C. §§ 1319(d), 1365(a), occurring from at least July 28, 2015

to the present. Civil penalties for violations of the Clean Water Act subject the violator to a penalty of up to \$55,800 per day per violation for violations occurring after November 2, 2015 and \$37,500 per day per violation for violations occurring before November 2, 2015. 40 C.F.R. § 19.4 (effective Jan. 13, 2020).

63. Section 505(d) of the Clean Water Act, 33 U.S.C. § 1365(d), permits the prevailing or substantially prevailing parties to recover litigation costs, including attorneys' and experts' fees.

V. GENERAL ALLEGATIONS

A. The City's NPDES Permit

64. On October 26, 2012, FDEP renewed NPDES Domestic Wastewater Facility Permit No. FL0026603 for the City's WWTF (Permit No. FL0026603-007-DW1/NR). FDEP renewed the 2012 Permit on February 26, 2019 (Permit No. FL0026603-013-DW1/NR). The NPDES Permit authorizes the City to discharge effluent from the outfall identified as Surface Water Discharge D-001 in accordance with effluent limitations, monitoring requirements, and other provisions as set forth in the Permit.

65. Surface Water Discharge D-001 is a "point source" within the meaning of Section 502(14) of the Clean Water Act. 33 U.S.C. § 1362(14).

66. The WCTS consists of pipes and other manmade conveyances, and constitutes a point source under Section 502(14) the Clean Water Act, 33 U.S.C. § 1362(14).

67. The City is responsible for operating and maintaining the POTW, tasks which include, but are not limited to: properly collecting and conveying sewage through

the WCTS, proper treatment at the WWTF, conducting routine maintenance, cleaning, and inspection of the WCTS and WWTF, and responding to citizens' complaints regarding discharges of raw and/or partially treated sewage.

68. The City has persistently failed to properly operate and maintain its POTW, resulting in the effluent violations described above. Specifically, overflows of raw sewage come from the City's sewer lines, manholes, pump stations, and various other POTW equipment/conveyances that are part of the WCTS and the WWTF, spills and unauthorized discharges of partially treated sewage come from the WWTF, and spills and unauthorized discharges of treated reclaimed water come from the WWTF.

69. Since at least April 2019, the City has continuously discharged effluent containing TN and dichlorobromomethane in exceedance of the effluent limits in the NPDES Permit from Surface Water Discharge D-001 into Old Tampa Bay and/or adjoining waterways, as set forth on Exhibit 1.

70. Since at least July 28, 2015, the City has discharged effluent from Surface Water Discharge D-001 into Old Tampa Bay and/or adjoining waterways, in violation of the fecal coliform detection effluent limit contained in the NPDES Permit, as set forth on Exhibit 1.

71. TN, dichlorobromomethane, and fecal coliform are pollutants within the meaning of Section 502(6) of the Clean Water Act. 33 U.S.C. § 1362(6). These harmful pollutants result in the addition of pathogens, nutrients, and various toxic chemicals to the Receiving Waters.

72. The City's unlawful discharges of pollutants into navigable waters of the United States from a point source it controls, as alleged above, have increased in duration and volume over time, with the knowledge of the City and with no adequate measures taken to prevent or cease these discharges.

73. The City's volume and content of NPDES Permit violations alleged herein are reported in numerous documents, including, without limitation, the FDEP "Public Notices of Pollution" containing information submitted by the City, the City's Discharge Monitoring Reports ("DMRs") to FDEP under the NPDES Permit, the City's reports of SSOs and unauthorized discharge events to FDEP, the City's report to Florida's State Watch Office, the City's correspondence with FDEP, FDEP documents relating to the City's NPDES Permit, and in consent orders and amendments between the City and FDEP.

B. Sanitary Sewer Overflows

74. The City has reported numerous unauthorized overflows and discharges of raw and/or partially treated sewage from its WWTF and WCTS, including but not limited to sewer lines, manholes, pump stations, and various other POTW equipment/conveyances that are part of the overall collection system, and reclaimed water from its Master Reuse System since July 28, 2015. These overflows and discharges are referred to as sanitary sewer overflows ("SSOs"). The City's SSOs are documented in FDEP "Public Notices of Pollution" containing information submitted by the City, the City's reports of SSOs and unauthorized discharge events to FDEP, the

City's report to Florida's State Watch Office, the City's correspondence with FDEP, and FDEP documents relating to the Largo WWTF and WCTS.

75. The City has discharged and continues to discharge SSOs from the WWTF and WCTS to waters of the United States, and/or into its MS4 that then discharges to waters of the United States, without NPDES permit coverage, in violation of Section 301(a) of the Clean Water Act, 33 U.S.C. § 1311(a) and the MS4 Permits.

76. Of the SSOs from the WWTF and WCTS that have occurred since July 28, 2015, the City has reported that many have discharged to surface waters and/or into the MS4 owned and operated by the City.

77. SSOs from the WWTF and WCTS to waters of the United States, as well as SSOs that enter the City's MS4 from the WCTS and/or from privately-owned lateral lines, are discharged to the Receiving Waters, and/or to the MS4 that then discharges to waters of the United States.

78. The City has failed to act to eliminate its violations of the Clean Water Act. Specifically, the City has failed to adequately operate, maintain, repair, replace, and/or update the WWTF and WCTS, thus resulting in SSOs.

79. The City has reported that a major source of the City's SSOs is wet weather spills caused by the inadequate capacity of the WCTS and the WWTF to handle peak wet weather flows. Flows through the WCTS increase considerably during wet weather due to the infiltration and inflow of storm water and groundwater into sewer pipes, thus overwhelming the capacity of the WCTS and the WWTF causing SSOs.

80. The City has reported that many of the SSOs from the WCTS are the result of broken sewer lines, pump station equipment and force-main failures; undersized sewer lines or pump station pumping and/or storage capacity; and unaddressed defects in sewer lines such as extensive line cracking, sags in lines, and misaligned joints.

81. The City has reported that many of the SSOs from the WCTS are dry weather spills caused by fats, oil and grease in sewer lines, and blockages caused by roots and debris.

82. SSOs from the WWTF and WCTS are also caused by the deterioration of sewage infrastructure, under-funding of repairs, and mismanagement.

83. The City's WWTF and WCTS are deteriorating, and deferral of repairs allows the continued discharge of SSOs to waters of the United States in violation of the Clean Water Act.

84. The City's volume and content of SSOs alleged herein are reported in numerous documents, including, without limitation, the FDEP "Public Notices of Pollution" containing information submitted by the City, the City's reports of SSOs and unauthorized discharge events to FDEP, the City's report to Florida's State Watch Office, the City's correspondence with FDEP, FDEP documents relating to the City's NPDES Permit, and in consent orders and amendments between the City and FDEP.

C. The MS4 Permits

85. FDEP issued the MS4 Permits, No. FLS000005-003 in 2013 and MS4 Permit No. FLS000005-004 in 2018.

86. The MS4 Permits authorize the City to discharge stormwater to waters of the State in accordance with the approved Stormwater Management Program, effluent limitations, monitoring requirements, and other provisions as set forth in the permit.

87. The MS4 Permits contain prohibitions and limitations on the discharge of non-stormwater and/or pollutants into the MS4.

88. Part I.A of the MS4 Permits establishes that the City owns and operates the portions of the Pinellas County MS4 within its political boundaries.

89. The MS4 owned and operated by the City is a point source under Section 502(14) of the Clean Water Act, 33 U.S.C. § 1362(14).

90. The MS4 Permits define “Stormwater” as “stormwater runoff, surface runoff and drainage.” MS4 Permit No. Number FLS000005-003 at Part X.J and MS4 Permit No. FLS000005-004 at Part X.L.

91. Part I.D of the MS4 Permits require that the City effectively prohibit the discharge of non-stormwater into the MS4.

92. Part II.A.7.d. of the MS4 Permits require that the City implement procedures to prevent, contain, and respond to spills that may discharge into the MS4.

93. The MS4 Permits require that the City “take all reasonable steps to minimize or prevent any discharge, reuse of reclaimed water, or residuals use or disposal in violation of this permit which has a reasonable likelihood of adversely affecting human health or the environment.” No. Number FLS000005-003 at Part IX.E and MS4 Permit No. FLS000005-004 at Part IX.5.

94. As owner and operator of the MS4, the City is responsible for violations of the Clean Water Act alleged herein related to discharges of sewage into or from the MS4.

VI. CLAIMS FOR RELIEF

FIRST CAUSE OF ACTION

Permit Effluent Violations at Surface Water Discharge D-001

95. Paragraphs 1 through 94 are realleged and incorporated by reference herein.

96. During the period relevant to this Complaint, the City has discharged and likely will continue to discharge effluent from Surface Water Discharge D-001 containing pollutants in excess of effluent limitations and detection limitations in the NPDES Permit into Feather Sound and Old Tampa Bay, which are waters of the United States.

97. The City has exceeded the effluent limits in its NPDES Permit for TN and dichlorobromomethane for fifteen (15) consecutive months prior to the filing of this Complaint, and for fecal coliform detection limits for a total of 25 months since July 28, 2015. Exhibit 1 identifies the exceedances of effluent limits in the City's NPDES Permit at Surface Water Discharge D-001.

98. Significantly more violations of the NPDES Permit will likely be discovered through this enforcement action. Each such additional NPDES Permit violation is a separate violation of the NPDES Permit and the Clean Water Act.

99. For each exceedance of an effluent limitation, the City is in violation of Section 301 of the CWA, 33 U.S.C. § 1311, for discharging in violation of the conditions

and limitations of the applicable NPDES Permit under Section 402 of the CWA, 33 U.S.C. § 1342.

100. The City's violations of its NPDES Permit effluent limitations, in violation of the Clean Water Act, are ongoing and continuous.

101. By committing the acts and omissions alleged above, the City is subject to an assessment of civil penalties pursuant to the Clean Water Act sections 309(d) and 505(a), 33 U.S.C. §§ 1319(d), 1365(a), occurring from at least July 28, 2015 to the present.

102. An action for declaratory judgment is authorized by 28 U.S.C. § 2201.

103. An action for injunctive relief under the Clean Water Act is authorized by 33 U.S.C. § 1365(a). Continuing commission of the acts and omissions alleged above will irreparably harm Plaintiffs and the public for which harm they have no other plain, speedy, or adequate remedy at law.

SECOND CAUSE OF ACTION
Unpermitted Discharges
in Violation of Section 301(a) of the Clean Water Act

104. Paragraphs 1 through 103 are realleged and incorporated by reference herein.

105. The City has discharged and continues to discharge SSOs from its WWTF and WCTS to waters of the United States, and/or into its MS4 that then discharges to waters of the United States, without NPDES permit coverage, on at least 252 separate occasions since July 28, 2015, in violation of Section 301(a) of the Clean Water Act, 33 U.S.C. § 1311(a). A partial list of these discharges is listed on Exhibit 2 attached to this

Complaint. Plaintiffs will amend Exhibit 2 if further review indicates that additional SSOs have occurred.

106. Of the SSOs from the WWTF and WCTS since July 28, 2015, most have discharged to surface waters and/or into the MS4 operated by the City.

107. Each of the City's SSOs described above that has caused pollutants to flow into waters of the United States constitute a separate violation of Section 301(a) of the Clean Water Act.

108. Significantly more discharges of sewage than those reported by the City will likely be discovered through this enforcement action. Each such additional SSO discharge to waters of the United States is a separate Clean Water Act violation.

109. The City's discharges of SSOs to waters of the United States, and/or that enter its MS4 that then discharge to waters of the United States, are ongoing and continuous.

110. By committing the acts and omissions alleged above, the City is subject to an assessment of civil penalties pursuant to the Clean Water Act sections 309(d) and 505(a), 33 U.S.C. §§ 1319(d), 1365(a), occurring from at least July 28, 2015 to the present.

111. An action for declaratory judgment is authorized by 28 U.S.C. § 2201.

112. An action for injunctive relief under the Clean Water Act is authorized by 33 U.S.C. § 1365(a). Continuing commission of the acts and omissions alleged above will irreparably harm Plaintiffs and the public for which harm they have no other plain, speedy, or adequate remedy at law.

THIRD CAUSE OF ACTION
Sewage Discharges to the City's MS4,
in Violation of the MS4 Permits and Clean Water Act

113. Paragraphs 1 through 112 are realleged and incorporated by reference herein.

114. Part I.D of the MS4 Permits requires the City to prohibit and prevent the introduction of non-stormwater into the MS4 system. Raw sewage from sanitary sewage overflows is not within the definition of stormwater. MS4 Permit No. Number FLS000005-003 at Part X.J and MS4 Permit No. FLS000005-004 at Part X.L.

115. Additionally, Part II.A.7.d of the MS4 Permits requires the City to implement procedures to prevent, contain, and respond to spills that may discharge into the MS4.

116. The City has discharged and continues to discharge SSOs from the WWTF and WCTS into its MS4 that then discharges to waters of the United States without NPDES permit coverage, in violation of Section 301(a) of the Clean Water Act, 33 U.S.C. § 1311(a) and Part I.D of the MS4 Permits.

117. The City's sanitary sewer overflows that discharge to its MS4 represents the City's direct failure to prevent the comingling of stormwater and sewage and is a violation of Parts I.D and II.A.7.d of the MS4 Permits.

118. Each day of discharge by the City of non-stormwater in violation of the MS4 Permit is a separate and distinct violation of the Clean Water Act.

119. Significantly more SSOs of non-stormwater into the MS4 will likely be discovered through this enforcement action. Each such additional failure is a separate violation of the MS4 Permits and the Clean Water Act.

120. The City's discharges of non-stormwater into the MS4, in violation of the MS4 Permits and the Clean Water Act, are ongoing and continuous.

121. By committing the acts and omissions alleged above, the City is subject to an assessment of civil penalties pursuant to the Clean Water Act sections 309(d) and 505(a), 33 U.S.C. §§ 1319(d), 1365(a), occurring from at least July 28, 2015 to the present.

122. An action for declaratory judgment is authorized by 28 U.S.C. § 2201.

123. An action for injunctive relief under the Clean Water Act is authorized by 33 U.S.C. § 1365(a). Continuing commission of the acts and omissions alleged above will irreparably harm Plaintiffs and the public for which harm they have no other plain, speedy, or adequate remedy at law.

FOURTH CAUSE OF ACTION

Failure to Properly Operate and Maintain the City's POTW Including the Collection System and all related Appurtenances, in Violation of Part IX.7 of the City's NPDES Permit

124. Paragraphs 1 through 123 are realleged and incorporated by reference herein.

125. Part IX.7 of the City's NPDES Permit requires the City to properly operate and maintain the Largo WWTF and related appurtenances.

126. The City has violated Part IX.7 of its NPDES Permits with numerous deficient operation and maintenance practices. The City's persistent and extensive Clean

Water Act violations result from and evince a failure to properly operate and maintain its POTW, including neglect and mismanagement of its WWTF and all related appurtenances. The City has not taken the actions necessary to comply with the terms of its NPDES and MS4 Permits, which has led to hundreds of known violations.

127. The City's sewage spills have resulted from a variety of poor or inadequate POTW system maintenance, operation, repair, replacement and rehabilitation practices. These poor practices have led to sewer line blockages (generally caused by buildup of grease, accumulation of sediment and debris, and root intrusion), unaddressed defects in sewer lines such as extensive line cracking, sags in lines, and misaligned joints; broken sewer lines, pump station equipment failures, undersized sewer lines or pump station pumping and/or storage capacity, and the overwhelming of system capacity due to excessive infiltration and inflow of stormwater and groundwater during wet weather. The City has not corrected these operational or maintenance problems and the violations are continuing.

128. Each day the City fails to properly operate and maintain its POTW is a separate and distinct violation of the Clean Water Act.

129. The City's failure to properly operate and maintain its POTW is ongoing and continuous.

130. By committing the acts and omissions alleged above, the City is subject to an assessment of civil penalties pursuant to the Clean Water Act sections 309(d) and 505(a), 33 U.S.C. §§ 1319(d), 1365(a), occurring from at least July 28, 2015 to the present.

131. An action for declaratory judgment is authorized by 28 U.S.C. § 2201.

132. An action for injunctive relief under the Clean Water Act is authorized by 33 U.S.C. § 1365(a). Continuing commission of the acts and omissions alleged above will irreparably harm Plaintiffs and the public for which harm they have no other plain, speedy, or adequate remedy at law.

VII. RELIEF REQUESTED

133. Plaintiffs respectfully request that this Court grant the following relief:

a. Declare the City to have violated and to be in violation of Section 301(a) of the Clean Water Act, 33 U.S.C. § 1311(a), for its discharges of Reclaimed Water and SSOs to waters of the United States without an NPDES permit;

b. Declare the City to have violated and to be in violation of the Clean Water Act for discharging pollutants without complying with the substantive and procedural requirements of the MS4 and NPDES Permits;

c. Enjoin the City from discharging Reclaimed Water and SSOs to waters of the United States without an NPDES permit, in violation of Section 301(a) of the Clean Water Act, 33 U.S.C. 1311(a);

d. Enjoin the City from violating the substantive and procedural requirements of the Clean Water Act and the MS4 and NPDES Permits;

e. Assess civil penalties against the City of up to \$37,500 per day per violation for violations occurring on or before November 2, 2015, and \$55,800

per day per violation for violations occurring after November 2, 2015. 40 C.F.R. § 19.4 (effective Jan. 13, 2020).

g. Award Plaintiffs their reasonable costs of suit, including attorney, witness, and consultant fees, as provided for under by Sections 309(d) and 505(a) of the Clean Water Act, 33 U.S.C. §§ 1319(d) and 1365(a); and

h. Any such other relief as the Court deems appropriate.

Dated: July 28, 2020

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Tampa Bay Waterkeeper, et al. v. City of Largo, Florida						
Table of NPDES Violations as of Date of Complaint						
Date (Month Ending)	Point of Discharge (Outfall)	Parameter	Limit Value	Limit Unit	Violation Type	Reported Value
04/30/19	D-001	Nitrogen, total [as N]	19	ton/year	5 YR AVG	26.14
05/31/19	D-001	Nitrogen, total [as N]	19	ton/year	5 YR AVG	26.27
06/30/19	D-001	Nitrogen, total [as N]	19	ton/year	5 YR AVG	26.41
07/31/19	D-001	Nitrogen, total [as N]	19	ton/year	5 YR AVG	27.08
08/31/19	D-001	Nitrogen, total [as N]	19	ton/year	5 YR AVG	26.41
09/30/19	D-001	Nitrogen, total [as N]	19	ton/year	5 YR AVG	27.53
10/31/19	D-001	Nitrogen, total [as N]	19	ton/year	5 YR AVG	27.43
11/30/19	D-001	Nitrogen, total [as N]	19	ton/year	5 YR AVG	27.57
12/31/19	D-001	Nitrogen, total [as N]	19	ton/year	5 YR AVG	27.73
01/31/20	D-001	Nitrogen, total [as N]	19	ton/year	5 YR AVG	27.79
02/29/20	D-001	Nitrogen, total [as N]	19	ton/year	5 YR AVG	27.62
03/31/20	D-001	Nitrogen, total [as N]	19	ton/year	5 YR AVG	27.42
04/30/20	D-001	Nitrogen, total [as N]	19	ton/year	5 YR AVG	27.34
05/31/20	D-001	Nitrogen, total [as N]	19	ton/year	5 YR AVG	27.33
06/30/20	D-001	Nitrogen, total [as N]	19	ton/year	5 YR AVG	27.45
04/30/19	D-001	Dichlorobromomethane	22	ug/L	ANNL AVG	46.8
05/31/19	D-001	Dichlorobromomethane	22	ug/L	ANNL AVG	45.6
06/30/19	D-001	Dichlorobromomethane	22	ug/L	ANNL AVG	47.7
07/31/19	D-001	Dichlorobromomethane	22	ug/L	ANNL AVG	49.7
08/31/19	D-001	Dichlorobromomethane	22	ug/L	ANNL AVG	47.7
09/30/19	D-001	Dichlorobromomethane	22	ug/L	ANNL AVG	46.9
10/31/19	D-001	Dichlorobromomethane	22	ug/L	ANNL AVG	44.5
11/30/19	D-001	Dichlorobromomethane	22	ug/L	ANNL AVG	42.7
12/31/19	D-001	Dichlorobromomethane	22	ug/L	ANNL AVG	42.5
01/31/20	D-001	Dichlorobromomethane	22	ug/L	ANNL AVG	43.2
02/29/20	D-001	Dichlorobromomethane	22	ug/L	ANNL AVG	43.9
03/31/20	D-001	Dichlorobromomethane	22	ug/L	ANNL AVG	44.3
04/30/20	D-001	Dichlorobromomethane	22	ug/L	ANNL AVG	45.0
05/31/20	D-001	Dichlorobromomethane	22	ug/L	ANNL AVG	44.1
06/30/20	D-001	Dichlorobromomethane	22	ug/L	ANNL AVG	44.3
08/31/15	D-001	% of fecal coliform samples < detectable	75	%	MO MIN	58
12/31/15	D-001	% of fecal coliform samples < detectable	75	%	MO MIN	74
01/31/16	D-001	% of fecal coliform samples < detectable	75	%	MO MIN	74
03/31/16	D-001	% of fecal coliform samples < detectable	75	%	MO MIN	48
04/30/16	D-001	% of fecal coliform samples < detectable	75	%	MO MIN	53
05/31/16	D-001	% of fecal coliform samples < detectable	75	%	MO MIN	55
06/30/16	D-001	% of fecal coliform samples < detectable	75	%	MO MIN	57
08/31/16	D-001	% of fecal coliform samples < detectable	75	%	MO MIN	65
09/30/16	D-001	% of fecal coliform samples < detectable	75	%	MO MIN	47
10/31/16	D-001	% of fecal coliform samples < detectable	75	%	MO MIN	68
11/30/16	D-001	% of fecal coliform samples < detectable	75	%	MO MIN	70
02/28/17	D-001	% of fecal coliform samples < detectable	75	%	MO MIN	46
03/31/17	D-001	% of fecal coliform samples < detectable	75	%	MO MIN	52
11/30/17	D-001	% of fecal coliform samples < detectable	75	%	MO MIN	70

Tampa Bay Waterkeeper, et al. v. City of Largo, Florida						
Table of NPDES Violations as of Date of Complaint						
Date (Month Ending)	Point of Discharge (Outfall)	Parameter	Limit Value	Limit Unit	Violation Type	Reported Value
01/31/18	D-001	% of fecal coliform samples < detectable	75	%	MO MIN	68
12/31/18	D-001	% of fecal coliform samples < detectable	75	%	MO MIN	74
02/28/19	D-001	% of fecal coliform samples < detectable	75	%	MO MIN	61
07/31/19	D-001	% of fecal coliform samples < detectable	75	%	MO MIN	74
08/31/19	D-001	% of fecal coliform samples < detectable	75	%	MO MIN	58
10/31/19	D-001	% of fecal coliform samples < detectable	75	%	MO MIN	65
11/30/19	D-001	% of fecal coliform samples < detectable	75	%	MO MIN	13
12/31/19	D-001	% of fecal coliform samples < detectable	75	%	MO MIN	26
01/31/20	D-001	% of fecal coliform samples < detectable	75	%	MO MIN	19
02/29/20	D-001	% of fecal coliform samples < detectable	75	%	MO MIN	38
04/30/20	D-001	% of fecal coliform samples < detectable	75	%	MO MIN	67

Total Count of NPDES Permit Violations	
Total Months of Violation: TN	15
Total Months of Violation: Dichlorobromomethane	15
Total Months of Violation: % of fecal coliform samples < detectable	25
Total Months of Violation: All Parameters	55
Total Days of Violation All Parameters (30 days per month)	1650

Tampa Bay Waterkeeper, et al. v. City of Largo, Florida															
Table of Sanitary Sewer Overflows and Unauthorized Discharges as of Date of Complaint															
YEAR	DATE OF DISCHARGE VIOLATION (BEGIN)	DATE OF DISCHARGE (CEASE)	TOTAL DAYS OF VIOLATION	LOCATION OF DISCHARGE	TYPE OF DISCHARGE	SOURCE OF DISCHARGE	CAUSE OF DISCHARGE	ESTIMATED TOTAL VOLUME OF DISCHARGE	ESTIMATED VOLUME OF DISCHARGE TO SURFACE WATER	ESTIMATED VOLUME OF DISCHARGE TO STORM SYSTEM	DATE OF REPORT	FLOWED TO SURFACE WATER (NAME)	FLOWED TO STORMWATER SYSTEM (NAME)	REACH SURFACE WATER (Y=1/N=0)	REACH STORM DRAIN (Y=1/N=0)
			294				TOTALS	50,428,077	48,729,204	970,617				139	53
2015	07/27/15	08/06/15	11	960 Starkey Rd	raw sewer	manhole	I and I, Capacity	1,620,738	1,596,738	na	7/27/2015	not provided	na	1	0
2015	07/28/15	08/02/15	6	Anglers Ln	raw sewer	manhole overflow	I and I	161,400	161,400	0	7/28/2015	not provided	na	1	0
2015	07/28/15	07/31/15	4	Donegan Rd & Lake Ave	raw sewer	bypass pipe, manhole	I and I, Capacity	4,293,000	4,293,000	0	7/28/2015	not provided	na	1	0
2015	07/28/15	07/29/15	2	Donegan Rd & 1050 Starkey Rd	raw sewer	manhole, gravity line	I and I, Capacity	36,563	36,563	0	7/28/2015	not provided	na	1	0
2015	07/28/15	08/06/15	10	Donegan Rd & Highland Ave SE	raw sewer	manhole	I and I, Capacity	1,230,526	1,230,526	0	7/28/2015	not provided	na	1	0
2015	07/28/15	08/02/15	6	1921 West Bay Dr & 20th St. SE	raw sewer	manhole	I and I, Capacity	346,163	36,163	0	7/28/2015	not provided	na	1	0
2015	08/03/15	08/04/15	2	58th St N & 3rd Ave	raw sewer	manhole	I and I, Capacity	74,062	74,062	0	8/3/2015	not provided	na	1	0
2015	08/03/15	08/04/15	2	Church Cr. Point	raw sewer	manhole	I and I, Capacity	85,000	85,000	0	8/3/2015	not provided	na	1	0
2015	08/03/15	08/05/15	3	Hillsdale & Gladys	raw sewer	manhole	I and I, Capacity	389,250	389,250	0	8/3/2015	not provided	na	1	0
2015	08/03/15	08/05/15	3	Gladys	raw sewer	manhole	I and I, Capacity	352,013	352,013	0	8/3/2015	not provided	na	1	0
2015	08/03/15	08/04/15	2	East Bay	raw sewer	cleanout overflow	I and I, Capacity	27,000	25,950	0	8/3/2015	not provided	na	1	0
2015	08/03/15	08/05/15	3	Gladys & 19th Place SW	raw sewer	manhole	I and I, Capacity	9,066	9,066	0	8/3/2015	not provided	na	1	0
2015	08/03/15	08/04/15	2	1915 Cove Dr	raw sewer	manhole	I and I, Capacity	85,312	85,312	0	8/3/2015	not provided	na	1	0
2015	08/04/15	unknown	1	2597 Cresent Dr; Mariners Cove & 58th St. N; 1915 Cove Dr; 4071 Church Cr. Point; Gladys and 19th Pl SW; Hillsdale & 30th Ln SW; 123 10th Ave SW; County Club Rd & East Bay Dr	raw sewer	manhole	overflow	450,000	450,000	0	8/4/2015	McKay Cr & Boca Ceita Bay	na	1	0
2015	08/04/15	08/06/15	3	123 10th Ave SW	raw sewer	manhole	I and I, Capacity	48,250	48,250	0	8/4/2015	not provided	na	1	0
2015	08/06/15	unknown	1	Donegan Rd & Lake Ave	raw sewer	force main	line break	unknown	unkonwn	unknown	8/6/2015	not provided	not provided	1	0
2015	08/08/15	08/09/15	2	Donegan Rd & Lake Ave	raw sewer	manhole	I and I, Capacity	382,500	382,500	0	8/8/2015	not provided	na	1	0
2015	08/08/15	08/09/15	2	Golf Lake Condos & 960 Starkey Rd	raw sewer	manhole	I and I, Capacity	159,375	159,375	0	8/8/2015	not provided	na	1	0
2015	08/08/15	08/09/15	2	1921 West Bay	raw sewer	manhole	I and I, Capacity	63,750	63,750	0	8/8/2015	not provided	na	1	0

Tampa Bay Waterkeeper, et al. v. City of Largo, Florida
Table of Sanitary Sewer Overflows and Unauthorized Discharges as of Date of Complaint

YEAR	DATE OF DISCHARGE VIOLATION (BEGIN)	DATE OF DISCHARGE (CEASE)	TOTAL DAYS OF VIOLATION	LOCATION OF DISCHARGE	TYPE OF DISCHARGE	SOURCE OF DISCHARGE	CAUSE OF DISCHARGE	ESTIMATED TOTAL VOLUME OF DISCHARGE	ESTIMATED VOLUME OF DISCHARGE TO SURFACE WATER	ESTIMATED VOLUME OF DISCHARGE TO STORM SYSTEM	DATE OF REPORT	FLOWED TO SURFACE WATER (NAME)	FLOWED TO STORMWATER SYSTEM (NAME)	REACH SURFACE WATER (Y=1/N=0)	REACH STORM DRAIN (Y=1/N=0)
			294				TOTALS	50,428,077	48,729,204	970,617				139	53
2015	08/08/15	08/09/15	2	Donegan Rd & Lake Ave; 960 Starkey Rd, 1921 W Bay & 20th Ave	raw sewer	manhole	overflow	604,625	604,625	0	8/8/2015	Seminole Bypass Canal & McKay Cr	na	1	0
2015	08/17/15	08/17/15	1	Harmony Dr & Rosery Rd	raw sewer	manhole	grease, l and l	750	250	0	8/17/2015	not provided	na	1	0
2015	08/17/15	08/18/15	2	Donegan Rd	raw sewer	manhole	l and l, Capacity	5,688	5,688	0	8/18/2015	lake Seminole bypass canal	na	1	0
2015	10/01/15	10/01/15	1	Ulmerton Rd & 38th St.	raw sewer	manhole	contractor	2,250	0	0	10/1/2015	na	na	0	0
2015	12/22/15	12/22/15	1	405 Church Cr. Pt	raw sewer	manhole	contractor, pump failure	1,387	1,387	0	12/22/2015	not provided	na	1	0
2015	12/22/15	12/22/15	1	1951 Cove Dr	raw sewer	manhole	contractor, pump failure	1,387	1,387	0	12/22/2015	not provided	na	1	0
2015	12/22/15	12/22/15	1	4054 Church Cr. Pt	raw sewer	manhole	equipment	5,548	5,548	0	12/22/2015	Boca Ciega Bay	na	1	0
2015	12/22/15	12/22/15	1	Suncoast Hospital & Indian Rock Rd	raw sewer	manhole	contractor, pump failure	1,387	1,387	0	12/22/2015	not provided	na	1	0
2015	12/22/15	12/22/15	1	Anglers Ln	raw sewer	manhole	contractor, pump failure	1,387	1,387	0	12/22/2015	not provided	na	1	0
2015	01/04/16	01/04/16	1	Adrian Av & Georgianna St	raw sewer	bypass pipe, lift station	contractor	unknown	0	unknown	1/4/2016	na	not provided	0	1
2015	01/08/16	01/08/16	1	3092 Pepperwood W	raw sewer	Gravity line	grease	350	0	0	1/9/2016	na	na	0	0
2016	01/13/16	01/13/16	1	1800 Seminole Blvd	raw sewer	force main	line break	1,300	0	1,300	1/13/2016	na	not provided	0	1
2016	01/25/16	01/25/16	1	Adrian Av & Georgianna St	raw sewer	bypass pipe	pump failure	50	0	0	1/25/16	na	na	0	0
2016	02/03/16	02/03/16	1	169th 15th St. NW	raw sewer	manhole overflow	grease/sand	1,800	1,800	0	2/3/16	not provided	na	1	0
2016	02/16/16	02/16/16	1	2nd Av NE & Ma	raw sewer	manhole overflow	pump failure	375	375	0	2/16/16	not provided	na	1	0
2016	02/18/16	02/18/16	1	Fulton Dr. & Willow St.	raw sewer	bypass pipe	damage by contractor	750	0	0	2/18/16	na	na	0	0
2016	03/02/16	03/02/16	1	62nd St. N & Roosevelt Blvd.	raw sewer	cleanout overflow	grease/line break	unknown	unknown	unknown	3/2/16	na	na	0	0
2016	04/04/16	04/04/16	1	3476 Adrian Ave	raw sewer	pybass pipe/force main	damage by contractor/line break	350	100	unknown	4/2/16	not provided	na	1	0
2016	05/27/16	05/27/16	1	Aidan Ave. & Georgianna St	raw sewer	manhole overflow	pump failure	unknown	402	unknown	5/27/16	not provided	na	1	0
2016	06/07/16	06/08/16	2	5100 150 Ave. N and 49th St. Roosevelt Blvd.	partially treated	wrrf effluent	I&I	3,750,000	3,750,000	0	6/7/16	rentention pond	na	1	0
2016	06/07/16	06/07/16	1	Church Cr & Indian Rocks	raw sewer	manhole overflow	I&I / Capacity	12,250	12,250	0	6/7/16	intercoastal waterway	na	1	0
2016	06/07/16	06/07/16	1	960 Starkey Rd.	raw sewer	manhole overflow	other - flooding	1,000	1,000	1,000	6/7/16	Boca Ciega Bay	Seminole bypass canal	1	1

Tampa Bay Waterkeeper, et al. v. City of Largo, Florida
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YEAR	DATE OF DISCHARGE VIOLATION (BEGIN)	DATE OF DISCHARGE (CEASE)	TOTAL DAYS OF VIOLATION	LOCATION OF DISCHARGE	TYPE OF DISCHARGE	SOURCE OF DISCHARGE	CAUSE OF DISCHARGE	ESTIMATED TOTAL VOLUME OF DISCHARGE	ESTIMATED VOLUME OF DISCHARGE TO SURFACE WATER	ESTIMATED VOLUME OF DISCHARGE TO STORM SYSTEM	DATE OF REPORT	FLOWED TO SURFACE WATER (NAME)	FLOWED TO STORMWATER SYSTEM (NAME)	REACH SURFACE WATER (Y=1/N=0)	REACH STORM DRAIN (Y=1/N=0)
			294				TOTALS	50,428,077	48,729,204	970,617				139	53
2016	06/07/16	06/07/16	1	Donegan Rd and Lake Av	raw sewer	manhole overflow	I&I / Capacity	168,937	156,937	0	6/7/16	not provided	seminole bypass canal	1	0
2016	06/07/16	06/08/16	2	16th Av. SW	raw sewer	force main	line break	34,614	28,614	0	6/7/16	not provided	na	1	0
2016	06/07/16	06/07/16	1	3476 Adrian Ave	raw sewer	manhole overflow	other - flooding	12,250	12,250	12,250	6/7/16	McKay Creek	not provided	1	1
2016	06/07/16	06/07/16	1	960 Starkey Rd.	raw sewer	manhole overflow	I&I / Capacity	122,072	114,072	114,072	6/7/16	Boca Ciega Bay	seminole bypass canal	1	1
2016	06/08/16	06/08/16	1	200 Country Club Dr.	raw sewer	manhole overflow / cleanout	pump failure / I&I	5,125	5,125	0	6/8/16	seminole bypass canal	na	1	0
2016	06/09/16	06/09/16	1	1867 Del Robles Dr.	raw sewer	manhole / lift station	pump failure / I&I	25	25	0	6/9/16	near Allens Cr.	na	1	0
2016	06/22/16	06/22/16	1	LS-10, 584 Forest Pkwy E.	raw sewer	manhole/lift station	pump failure/damage by contractor	200	0	0	6/22/16	na	na	0	0
2016	07/20/16	07/20/16	1	LS-12, 1014 Bay Breeze Terrace	raw sewer	manhole/bypass pipe	pump failure/infiltration and inflow	450	450	0	7/20/16	not provided	na	1	0
2016	07/24/16	07/24/16	1	200 Country Club Dr.	raw sewer	manhole/bypass pipe	pump failure/infiltration and inflow	2,000	2,000	0	7/24/16	not provided	Seminole Bypass Canal	1	0
2016	07/24/16	07/24/16	1	1627 Country Club Dr.	wastewater	manhole	blockage	2,000	2,000	2,000	7/25/16	not provided	Seminole Bypass Canal	1	1
2016	07/24/16	07/24/16	1	2597 Crescent Dr.	wastewater	manhole/bypass pipe	pump failure/infiltration and inflow	24,000	24,000	24,000	7/25/16	McKay Creek	not provided	1	1
2016	07/25/16	07/25/16	1	15400 Roosevelt Blvd	raw sewer	manhole	grease	450	450	0	7/25/16	not provided	na	1	0
2016	08/04/16	08/04/16	1	339 Country Club Dr.	raw sewer	gravity line	pump failure	3,000	3,000	0	8/4/16	not provided	na	1	0
2016	08/07/16	08/11/16	5	Donegan rd btw lake avenue and 8th Avenue	raw sewer	manhole	rain	397,875	397,875	0	8/8/16; 8/9/16; 8/11/16	Seminole Water Basin	na	1	0
2016	08/07/16	08/07/16	1	960 Golf Condominiums	raw sewer	manhole	infiltration and inflow	900	900	0	8/7/16	not provided	na	1	0
2016	08/08/16	08/09/16	2	Golf Lake Condominiums & Starkey Rd.	raw sewer	manhole	infiltration and inflow	84,750	74,750	unknown	8/9/16	Starkey Water Basin	stormwater system that flows to Starkey Water Basin	1	1
2016	08/08/16	08/09/16	2	5TH Ave NE	raw sewer	manhole	infiltration and inflow	28,875	28,875	28,875	8/8/16	Starkey Water Basin	stormwater system that flows to Starkey Water Basin	1	1
2016	08/09/16	08/09/16	1	13455 Wilcox Rd	raw sewer	manhole/lift station	pump failure/wet weather	18,000	12,000	0	8/9/16	not provided	na	1	0
2016	08/09/16	08/10/16	2	960 Starkey Rd	raw sewer	manhole	rain	159,000	159,000	159,000	8/10/16	Starkey Water Basin	stormwater system that flows to Starkey Water Basin	1	1
2016	08/09/16	08/10/16	2	5th Ave	raw sewer	manhole	infiltration and inflow	52,500	52,500	0	8/10/16	not provided	na	1	0

Tampa Bay Waterkeeper, et al. v. City of Largo, Florida															
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			294				TOTALS	50,428,077	48,729,204	970,617				139	53
2016	08/12/16	08/12/16	1	Del Robles Terrace	raw sewer	manhole	pump failure	1,875	1,875	0	8/12/16	not provided	na	1	0
2016	08/12/16	08/13/16	2	855 Seacrest Dr.	raw sewer	manhole	equipment	7,500	7,500	7,500	8/13/16	Allens Creek	storm drain that empties into Allens Creek	1	1
2016	08/13/16	08/13/16	1	Del Robles Terrace (Clearwater)	raw sewer	lift station	pump failure	5,625	5,625	0	8/13/16	not provided	na	1	0
2016	08/15/16	08/15/16	1	1942 Cove Dr.	wastewater	gravity line/manhole	pump failure	4,500	4,500	0	8/15/16	McKay Creek	na	1	0
2016	08/28/16	08/28/16	1	Crescent Dr. and 8th Ave SW	raw sewer	lift station	blockage	12,000	12,000	12,000	8/28/16	McKay Creek	McKay Creek	1	1
2016	08/31/16	09/02/16	3	2nd Ave NE	raw sewer	manhole	excessive rainfall	43,031	43,031	unknown	09/08/16	Starkey Rd Water Basin	na	1	0
2016	08/31/16	09/03/16	4	1101 16th Ave NW	raw sewer	manhole	infiltration and inflow	688,500	688,500	unknown	08/31/16	not provided	na	1	0
2016	08/31/16	unknown	1	1000 2nd St. SE/Public Works	raw sewer	manhole (2 different)	excessive rainfall	838,637	838,637	unknown	9/8/16	Starkey Rd Water Basin	unknown	1	0
2016	08/31/16	09/06/16	7	Golf Lake Condos	raw sewer	manhole	infiltration and inflow	1,952,561	1,952,561	unknown	8/31/16	Starkey Rd Water Basin	unknown	1	0
2016	08/31/16	09/05/16	6	Donegan Rd	raw sewer	manhole (2 different)	excessive rainfall	5,445,000	5,445,000	unknown	8/31/16	Starkey Rd Water Basin	unknown	1	0
2016	08/31/16	unknown	1	5th Ave NE	raw sewer	manhole (2 different)	excessive rainfall	532,769	532,769	unknown	9/8/16	Starkey Rd Water Basin	unknown	1	0
2016	08/31/16	unknown	1	10TH AV SW	raw sewer	manhole (2 different)	excessive rainfall	540,000	540,000	unknown	9/8/16	McKay Creek	unknown	1	0
2016	08/31/16	09/01/16	2	Lancaster Ave and Aleshia Dr.	raw sewer	manhole	infiltration and inflow	39,375	39,375	unknown	8/31/16	Allens Creek	unknown	1	0
2016	08/31/16	08/31/16	1	Wilcox Rd at Vonn Rd	raw sewer	manhole	infiltration and inflow	44,531	44,531	unknown	8/31/16	McKay Creek	unknown	1	0
2016	08/31/16	09/02/16	3	Crescent Dr. and 8th Ave.	raw sewer	manhole	infiltration and inflow	325,875	323,875	unknown	8/31/16	McKay Creek	unknown	1	0
2016	08/31/16	09/04/16	5	5000 150th Ave N, WWRF	partially treated wastewater	bypass pipe	capacity	11,880,000	11,880,000	0	9/2/16	not provided	na	1	0
2016	09/01/16	09/07/16	7	West Bay Dr. and 20th St.	raw sewer	manhole	infiltration and inflow	1,509,000	1,509,000	unknown	9/1/16	McKay Creek	unknown	1	0
2016	09/02/16	09/04/16	3	358 6th St. NW	raw sewer	manhole	excessive rainfall	536,250	526,350	unknown	9/8/16	McKay Creek	unknown	1	0
2016	10/03/16	10/03/16	1	3550 Cove Cay Dr.	raw sewer	manhole	rags and paper	600	600	600	10/3/16	not provided	storm drain which flowed to a pond	1	1
2016	10/03/16	10/04/16	2	5100 150th Avenue North Clearwater	reclaimed water	storage tanks	tanks had too much water and couldnt hold more	8,000,000	8,000,000	0	10/5/16	Old Tampa Bay	na	1	0
2016	10/07/16	10/07/16	1	Country Club Dr.	raw sewer	manhole cleanout	pump failure	2,500	2,500	2,500	10/7/16	Starkey water basin/Seminole Canal	not provided	1	1
2016	10/19/16	10/19/16	1	6th Ave SW and 5th St. SW	raw sewer	gravity line	grease/sand	150	120	120	10/19/2016	not provided	not provided	1	1

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			294				TOTALS	50,428,077	48,729,204	970,617				139	53
2016	10/19/16	10/19/16	1	5th Ave & 4th St SW, 5th Ave SW, & 4th St SW	raw sewage	manhole	grease	300	150	0	10/19/2016	not provided	na	1	0
2016	10/21/16	10/21/16	1	584 Forest Parkway	untreated wastewater	level pressure transducer	failure	100	0	0	10/21/2016	na	na	0	0
2016	10/27/16	10/28/16	2	Donegan Rd and Lake Ave	untreated wastewater	pipeline discharge point	blockage	1,200	1,200	0	10/27/16	not provided	na	1	0
2016	10/30/16	10/30/16	1	Country Club Dr.	untreated wastewater	cleanout	pump failure	1,500	1,100	0	10/30/16	not provided	na	1	0
2016	10/30/16	10/30/16	1	Donegan Rd & Lake Avenue SE	untreated wastewater	bypass hose	overflow	100	100	0	10/30/16	not provided	na	1	0
2016	11/04/16	11/04/16	1	200 Country Club Dr.	untreated wastewater	cleanout	overflow	225	225	0	11/4/16	not provided	na	1	0
2016	11/08/16	11/08/16	1	1100 Ponce de Leon Blvd.	untreated wastewater	manhole	overflow	50	50	0	11/8/16	not provided	na	1	0
2016	11/28/16	11/28/16	1	3300 Block of Executive Dr., 34th St. N, & Ulmerton St.	raw sewage	manhole	grease	2,033	2,033	0	11/28/16	not provided	na	1	1
2016	12/01/16	12/01/16	1	712 Shore Dr & Seacrest	raw sewage	manhole	grease	750	750	0	12/1/16	not provided	na	1	0
2016	12/05/16	12/05/16	1	Lake Judy Lee Dr & Country Club Dr	raw sewage	manhole	grease	1,500	1,000	0	12/5/16	not provided	na	1	1
2016	12/20/16	12/20/16	1	2728 Forest Pkwy & Oakwood Dr.	raw sewage	manhole	pump failure	500	475	0	12/20/16	Allens Creek	na	1	1
2016	12/20/16	12/20/16	1	584 Forest Parkway	untreated wastewater	manhole	component failure	475	475	0	12/20/16	Allens Creek	na	1	0
2017	01/28/17	01/28/17	1	200 Country Club Drive & Judy Lee Dr	raw sewage	manhole	overflow	500	500	0	02/03/17	not provided	na	1	0
2017	01/28/17	01/28/17	1	12991 Sophia Circle & Wilcox Road	wastewater	gravity line	grease	500	500	0	01/28/17	not provided	na	1	0
2017	02/08/17	02/08/17	1	13455 Wilcox Road	raw sewage	lift station	power failure	189,000	187,000	0	02/08/17	not provided	na	1	0
2017	03/06/17	03/06/17	1	10500 Ulmerton Road	raw sewage	manhole	blockage	1,000		0	03/06/17	not provided	na	0	0
2017	04/02/17	04/02/17	1	200 Country Club Drive & Lake Judy Lee Dr	raw sewage	manhole	grease	5,000	4,500	0	04/02/17	not provided	na	1	0
2017	05/23/17	05/23/17	1	13630 50th Way North	raw sewage	manhole	roots	825		0	05/23/17	not provided	na	0	0
2017	06/01/17	06/01/17	1	632 Shore Drive	raw sewage	manhole	grease	100	90	0	06/01/17	not provided	na	1	1
2017	06/26/17	06/26/17	1	1145 Ponce de Leon Blvd	sanitary wastewater	manhole	blockage	9,000		0	06/26/17	not provided	na	0	0

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			294				TOTALS	50,428,077	48,729,204	970,617				139	53
2017	06/30/17	06/30/17	1	200 Country Club Dr & Judy Lee Dr	raw sewage	manhole	overflow	3,750	3,750	0	06/30/17	not provided	na	1	0
2017	07/11/17	07/11/17	1	13455 Wilcox Rd & Sophia Circle	raw sewage	lift station	overflow	30,000	30,000	unknown	07/11/17	not provided	Church Creek	1	1
2017	07/24/17	07/24/17	1	Eastwood Shores & Bough	raw sewage	manhole	overflow	4,800	4,800	unknown	07/24/17	not provided	Tampa Bay	1	1
2017	07/31/17	07/31/17	1	200 Country Club Dr. & Judy Lee Dr.	raw sewage	manhole	overflow	120	120	0	07/31/17	not provided	na	1	0
2017	08/01/17	08/01/17	1	13101 Belcher Rd & Ulnerton Rd	raw sewage	force main	damage by contractor	60,000	0	unknown	08/01/17	na	not provided	0	1
2017	08/09/17	08/09/17	1	3215 Whispering Dr. & Wild Acres	raw sewage	air release valve	faulty piping	2,400	1,700	0	09/09/17	not provided	na	1	0
2017	08/15/17	08/15/17	1	15080 Verona Avenue & 150th Avenue	raw sewage	manhole	overflow	220	0	0	08/15/17	na	na	0	0
2017	08/21/17	08/21/17	1	City of Largo WWRF & 49th Street	raw sewage	WWRF influent	overflow	10,000	0	0	08/21/17	na	na	0	0
2017	08/24/17	08/24/17	1	Lift Station #2, Lake Ave. & Highland Ave	raw sewage	lift station	backup	2,540	2,040	unknown	08/24/17	not provided	not provided	1	1
2017	08/28/17	08/28/17	1	13455 Wilcox Rd & Sophia Circle	raw sewage	manhole	overflow	5,250	5,250	unknown	08/28/17	not provided	not provided	1	1
2017	09/11/17	09/11/17	1	Sun Point Place Apartments & East Bay Dr	raw sewage	manhole	power failure	30,000	30,000	0	09/11/17	Largo Nature Preserve	na	1	0
2017	09/11/17	09/11/17	1	1754 Indian Rocks Rd & Penelope Lane	raw sewage	manhole	overflow	4,875	4,875	0	09/11/17	not provided	na	1	0
2017	09/11/17	09/11/17	1	4054 Church Creek Pt & Indian Rocks Rd	raw sewage	manhole	overflow	3,000	3,000	0	9/11/17	not provided	na	1	0
2017	09/11/17	09/11/17	1	1942 Cove Dr & Indian Rocks Road	raw sewage	manhole	overflow	2,875	2,875	0	09/11/17	not provided	na	1	0
2017	09/11/17	09/11/17	1	3884 Anglers Lane & Indian Rocks Rd	raw sewage	manhole	overflow	3,500	3,500	0	09/11/17	not provided	na	1	0
2017	09/11/17	09/11/17	1	Lift Station #2, Country Club Dr & East Bay Dr	raw sewage	manhole	power failure	17,425	17,425	0	9/11/17	not provided	na	1	0
2017	09/12/17	09/12/17	1	2326 Seton Lane & Edgewater	raw sewage	manhole	power failure	300	300	unknown	09/12/17	Mckay Creek	not provided	1	1

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			294				TOTALS	50,428,077	48,729,204	970,617				139	53
2017	09/21/17	09/21/17	1	13455 Wilcox Road & Sophia Circle	raw sewage	manhole	damage by contractor	33,750	33,250	unknown	09/21/17	not provided	Roosevelt Creek #23	1	1
2017	10/08/17	10/08/17	1	City of Largo WWRF & 49th Street	wastewater	WWRF influent	overflow	10,000	0	0	10/08/17	na	na	0	0
2017	11/02/17	11/02/17	1	2397 Crescent Dr	wastewater	lift station	equipment	7,400	unknown	unknown	11/02/17	Mckay Creek	not provided	1	1
2018	01/06/18	01/06/18	1	2709 8th Ave SW & Crescent Drive	reclaimed water	reclaimed water line	trailer accident	14,150	14,150	0	01/08/18	Mckay Creek	na	1	0
2018	01/26/18	01/26/18	1	Fulton & Willow Ditchline & Paradise Isle Mhp	raw sewage	air release valve	damage by city worker	20	0	0	01/26/18	na	na	0	0
2018	02/23/18	02/23/18	1	1145 Ponce de Leon	raw sewage	manhole	blockage	19,250	19,250	unknown	02/23/18	Belleair Creek	not provided	1	1
2018	06/09/18	06/09/18	1	City of Largo lift station #2	raw sewage	manhole	overflow	2,650	2,650	2,650	06/11/18	not provided	not provided	1	1
2018	06/14/18	06/15/18	2	Country Club Dr.	raw sewage	manhole	overflow	1,450	1,450	0	06/15/18	Starkey Road Basin	na	1	0
2018	06/23/18	06/23/18	1	3476 Adrian Ave	raw sewage	manhole	equipment	1,250	1,250	1,250	06/24/18	Mckay Creek	not provided	1	1
2018	07/02/18	07/02/18	1	3051 Tech Drive & 34th Street	raw sewage	manhole	pump failure	150	0	0	07/02/18	na	na	0	0
2018	07/09/18	07/09/18	1	3051 Tech Dr & 34th St N	raw sewage	manhole	overflow	100	0	0	07/09/18	na	na	0	0
2018	07/16/18	07/16/18	1	14623 54th Way N & 150th Ave	raw sewage	manhole	grease	1,800	1,700	0	07/16/18	Cross Bayou Basin	na	1	0
2018	07/27/18	07/27/18	1	1115 Ponce de Leon & Clearwater Largo Road	raw sewage	lift station	overflow	10,000	9,000	unknown	07/27/2018	not provided	Bel Air Creek Basin	1	1
2018	07/28/18	07/28/18	1	200 Country Club Drive & Judy Lee Drive	wastewater	clean out	blockage	30	30	unknown	07/28/18	not provided	not provided	1	1
2018	08/13/18	08/13/18	1	2350 Seton Lane	wastewater	manhole	sand/grease	88,500	84,500	0	08/13/18	not provided	na	1	0
2018	08/14/18	08/14/18	1	301 Seacrest Drive & Keene Park Drive	wastewater	manhole	grease	200	0	0	08/14/18	na	na	0	0
2018	08/29/18	08/29/18	1	13455 Wilcox Rd., Cove Drive, & Church Creek Point	wastewater	lift station, manhole	overflow	217,500	7,500	0	08/30/18	Intercoastal Waterway	na	1	0
2018	08/29/18	08/29/18	1	1100 Belcher Rd.	wastewater	manhole	overflow	24,750	0	0	08/30/18	na	na	0	0
2018	10/07/18	10/07/18	1	3666 135th Avenue N & Coral Way	wastewater	clean out	blockage	5	0	0	10/07/18	na	na	0	0

Tampa Bay Waterkeeper, et al. v. City of Largo, Florida															
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			294				TOTALS	50,428,077	48,729,204	970,617				139	53
2019	01/10/19	01/10/19	1	WaterChase Apartments and Madison at Largo	wastewater	manhole	blockage	59,350	58,350	58,350	01/10/19	Long Bayou	not provided	1	1
2019	04/03/19	04/03/19	1	Carr Ruben Ctr & 56th Court	raw sewage	force main	damage by contractor	2,400	0	1,200	04/03/19	na	not provided	0	1
2019	04/30/19	04/30/19	1	9025 Ulmerton Rd.	wastewater	grease interceptor	overflow	60	0	0	04/30/19	na	na	0	0
2019	06/12/19	06/12/19	1	Twigg Terrace, 130th Ave. & 137th Ave	wastewater	manhole	damage by contractor	800	0	0	06/12/19	na	na	0	0
2019	06/14/19	06/14/19	1	1019 Woodbrook Dr. S	untreated wastewater	unknown	unknown	225	225	225	06/14/19	not provided	not provided	1	1
2019	06/27/19	06/27/19	1	5100 150th Ave. N	untreated wastewater	unknown	unknown	200	0	0	06/27/19	na	na	0	0
2019	07/08/19	07/09/19	2	2200 Lake Avenue SE & Ulmerton Road	wastewater	gravity line	damage by contractor	1,600	unknown	unknown	07/08/19	Long Bayou	not provided	1	1
2019	07/25/19	07/25/19	1	5100 150th Avenue North, Clearwater	wastewater	overflow at plant	high rain event	1,950	0	0	07/25/19	na	na	0	0
2019	07/26/19	07/26/19	1	5100 150th Avenue North	partially treated wastewater	pipe	break-in-line	9,000	600	0	07/27/19	not provided	na	1	0
2019	07/30/19	07/30/19	1	3335 Ulmerton Road, Clearwater	raw sewage	manhole	overflow	300	200	200	07/31/19	Roosevelt Creek	not provided	1	1
2019	08/05/19	08/05/19	1	3600 Oak Manor Lane	wastewater	manhole	blockage	1,580	1,500	1,500	08/06/19	Mckay Creek	not provided	1	1
2019	08/16/19	08/16/19	1	Donegan Road	untreated wastewater	manhole	overflow	18,000	18,000	0	8/17/19	Seminole Bypass Canal	na	1	0
2019	08/16/19	08/16/19	1	1130 5th Ave N.E. & Highland Ave	untreated wastewater	manhole	high rain event	162,875	162,875	0	08/16/2019	Seminole Bypass Canal	na	1	0
2019	08/16/19	08/18/19	3	1700 Harmony Drive & Idle Drive	raw sewage	manhole	high rain event	138,950	138,950	138,950	08/16/19	Allen's Creek	not provided	1	1
2019	08/16/19	08/18/19	3	Hillsdale Ave & Gladys St	raw sewage	manhole	high rain event	125,140	125,140	unknown	08/16/19	Mckay Creek	not provided	1	1
2019	08/16/19	08/18/19	3	1931 W. Bay Drive	raw sewage	manhole, grease interceptor	high rain event	187,300	187,300	187,300	08/16/19	Mckay Creek	not provided	1	1
2019	08/16/19	08/18/19	3	5000 150th Avenue North	partially treated wastewater	WRF	high rain event	187,050	unknown	unknown	08/16/19	unknown	unknown	unknown	unknown
2019	08/17/19	8/17/19	1	Donegan Road & Lake Avenue	untreated wastewater	manhole	high rain event	15,000	15,000	0	08/17/19	not provided	na	1	0
2019	08/17/19	8/18/19	2	1025 1st Street SW	raw sewage	manhole	high rain event	97,200	97,200	97,200	08/18/19	McKay Creek	not provided	1	1
2019	08/17/19	8/18/19	2	123 10th Ave. SW	raw sewage	manhole	high rain event	84,750	84,750	84,750	08/18/19	McKay Creek	not provided	1	1
2019	08/23/19	8/23/19	1	301 Seacrest Dr.	raw sewage	manhole	overflow	1,700	1,700	1,700	08/23/19	Starkey Road Basin	not provided	1	1

Tampa Bay Waterkeeper, et al. v. City of Largo, Florida															
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			294				TOTALS	50,428,077	48,729,204	970,617				139	53
2019	09/03/19	09/03/19	1	13391 Vonn Road & 134th Avenue	reclaimed water	WWRF reclaimed	broken valve	240,000	0	0	09/03/19	na	na	0	0
2019	10/19/19	10/19/19	1	5100 150th Avenue North	partially treated wastewater	bypass valve	overflow	100	0	0	10/19/19	na	na	0	0
2019	10/24/19	10/24/19	1	Central Park Apartments, 301 Seacrest Drive, & Barnsdale Drive	raw sewage	manhole	grease	120	0	50	10/24/19	na	not provided	0	1
2019	10/31/19	10/31/19	1	13531 Twigg Terrace	untreated wastewater	manhole	damage by contractor	6,750	6,750	6,750	10/31/19	Mckay Creek	not provided	1	1
2019	11/19/19	11/19/19	1	401 Rosary Rd NE	untreated wastewater	manhole	grease	200	200	200	11/19/19	not provided	not provided	1	1
2019	11/29/19	11/29/19	1	2175 62nd Street N & Roosevelt	untreated wastewater	manhole	overflow	85	0	0	11/29/19	na	na	0	0
2019	12/06/19	12/06/19	1	1177 Missouri Avenue & Rosery Road	raw sewage	manhole	grease	225	0	unknown	12/06/19	na	not provided	0	1
2019	12/19/19	12/19/19	1	17964 US 19, Clearwater & Belleair Rd	wastewater	force main	line break/cave in	500	0	0	12/19/19	na	na	0	0
2020	01/02/20	01/02/20	1	5100 150th Street N, Clearwater & City of Largo AWWTF	wastewater	force main	damage by contractor	800	0	0	01/02/20	na	na	0	0
2020	01/15/20	01/15/20	1	13845 US 19 & 142nd Ave N	wastewater	force main	line break/cave in	100	0	0	01/15/20	na	na	0	0
2020	01/16/20	01/16/20	1	788 N. Missouri Ave & Rosery Road	wastewater	force main	damage by contractor	40	0	0	01/26/20	na	na	0	0
2020	01/22/20	01/22/20	1	12923 127th Ave N. & 130th Streen N	wastewater	manhole	grease	1,125	1,125	1,125	01/22/20	not provided	not provided	1	1
2020	02/01/20	02/01/20	1	1709 Dunbar Lane, Clearwater & Croydon Drive	untreated wastewater	bypass pipe	damage by contractor	1,000	1,000	1,000	02/01/20	Seminole Bypass Canal	not provided	1	1
2020	02/06/20	02/06/20	1	2200 Gladys Street - Autumn Chase & 134th Avenue N	untreated wastewater	manhole	grease	550	550	unknown	02/06/20	Mccay Creek	nearby storm drain	1	1
2020	02/06/20	02/06/20	1	1857 Bough Ave - Eastwood Shores & Haines Bayshore	untreated wastewater	manhole	power failure	1,500	1,500	0	02/06/20	Tampa Bay	na	1	0

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			294				TOTALS	50,428,077	48,729,204	970,617				139	53
2020	02/08/20	02/08/20	1	200 Country Club Dr. Venetia Apts & East Bay Drive	untreated wastewater	clean out	blockage	2,100	2,100	0	02/08/20	Seminole Bypass Canal	na	1	0
2020	02/23/20	02/23/20	1	5100 150th Ave North & 49th Street N	partially treated wastewater	overflow at plant	power failure	105,000	0	0	02/23/20	na	na	0	0
2020	02/26/20	02/26/20	1	13030 Starkey Road & 130th Ave N	wastewater	grease trap manhole	grease	150	0	0	2/26/20	na	na	0	0
2020	02/29/20	02/29/20	1	13391 Vonn Rd.	reclaimed water	reuse water	equipment	180,000	0	0	2/29/20	na	na	0	0
2020	03/12/20	03/12/20	1	5100 150th Ave N & 49th St. N	reclaimed water	reclaimed water line	damage by contractor	80	0	0	3/12/20	na	na	0	0
2020	03/20/20	03/20/20	1	5000 150th Avenue North	partially treated wastewater	pump	equipment	200	0	0	3/20/20	na	na	0	0
2020	04/05/20	04/06/20	2	2554 Oak Trail South	untreated wastewater	manhole	blockage	8,250	0	unknown	04/06/20	na	nearby storm drain	0	1
2020	05/28/20	05/28/20	1	5000 150th Avenue North	fully treated reclaimed wastewater	RCW	contractor	50,000	0	0	06/01/20	na	na	0	0
2020	06/15/20	06/15/20	1	5000 150th Avenue North	reclaimed wastewater	RCW	inaccurate sensors	150,000	0	0	06/16/20	na	na	0	0
2020	07/07/20	07/07/20	1	13030 Starkey Road, 130th Ave North	untreated wastewater	manhole	repair	200	0	0	07/08/20	na	na	0	0
2020	07/14/20	07/15/20	2	8265 Wild Oak Circle	untreated wastewater	force main break	accident	21,000	0	21,000	07/15/20	na	na	0	1