



May 29, 2020

Via Email and Certified Mail, Return Receipt Requested

City of Largo
% Henry Schubert, City Manager
PO Box 296
Largo, Fl 33779

Irvin Kety
City of Largo, Director of Environmental Services
PO Box 296
Largo, Fl 33779

Alan S. Zimmet, Esq.
City of Largo, City Attorney
201 North Franklin Street
Suite 2700
Tampa, FL 33602

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

Dear Mr. Schubert, Mr. Kety and Mr. Zimmet,

I am writing on behalf of Suncoast Waterkeeper, Tampa Bay Waterkeeper and Our Children's Earth Foundation (collectively "Citizens") to notify you of ongoing violations of the federal Clean Water Act ("CWA") at the Largo Wastewater Treatment Facility ("Largo WWTF") and throughout its publicly owned treatment works ("POTW") which provide for the collection, treatment, reclamation and discharge of sanitary sewage produced by the City of Largo.

The City of Largo is violating the CWA by its repeated discharges of effluent from the City of Largo WWTF in clear violation of its NPDES Permit (most notably by its persistent loading of Total Nitrogen into Old Tampa Bay in exceedance of its Permit), by its repeated spills of raw sewage from its wastewater collection system into area waters or into the City's stormwater system, by its repeated spills of partially treated sewage and reclaimed water from the Largo WWTF into area waters or into the stormwater system, and by a persistent failure to properly operate and maintain its POTW. These violations have apparently occurred for years and have caused and continue to cause very substantial amounts of pollutants to be discharged into Old Tampa Bay, Tampa Bay, Cross Bayou, Lake Seminole, McKay Creek, Seminole Bypass Canal, Clearwater Harbor, Allen Creek, Church Creek, Rattlesnake Creek, Long Bayou, Boca Ciega Bay, and the Gulf of Mexico ("Receiving Waters"), which are all Waters of the United States. These discharges have caused serious injury and continue to cause or threaten ongoing serious injury to the health, environmental, aesthetic and economic interests of the Citizens and their members.

Pursuant to Section 505(b)(1)(A) of the CWA, 33 U.S.C. §1365(b)(1)(A), Citizens hereby give notice of their intent to sue the City of Largo for violations of the CWA unless, within 60 days of receipt of this letter, the City enters into a binding agreement to cease and remediate promptly all such violations. At any time more than sixty days after providing notice, Citizens are entitled to bring suit against: "any person . . . alleged to be in violation" of an "effluent standard or limitation" established under the CWA and as that term is defined in Section 505(f). The Citizens may therefore bring suit under this law to abate the City's discharges that cause pollution as well as the pollution itself.

Consistent with the Citizens' resolution of similar matters initiated by the Citizens under the federal CWA, we invite the City to engage in immediate discussions among engineers and counsel with the objective of agreeing to timely corrective actions necessary to bring the City into compliance with the CWA and an appropriate civil penalty under the CWA. Any such agreement would be memorialized in a settlement filed in federal Court that will resolve Citizens' CWA claims for the City's past and ongoing violations.¹

We propose a meeting to discuss this matter during the week of June 15, 2020 with the following City representatives in attendance: City Attorney Alan Zimmet, City Manager Henry Schubert, City Engineering Services Director Jerry Woloszynski, and the City's Environmental Services Director Irvin Kety. The meeting should take place virtually, in light of

¹ See *Suncoast Waterkeeper, et al v. City of Saint Petersburg*, (Case No. 8:16-cv-03319-JDW-AEP, M.D. Fla); *Suncoast Waterkeeper, et al v. City of Gulfport, Florida*, (Case No. 8:17-cv-00035-SCB-AEP M.D. Fla); *Suncoast Waterkeeper, et al v. Sarasota County, Florida* (Case No. 8:19-cv-00956-WFJ-JSS, M.D. Fla).

COVID-19, and we suggest the meeting commence with a discussion among the engineers (the Citizens have retained a sewage engineer for this case) as to the City's attempts to achieve compliance and the underlying causes of the violations. Thereafter, counsel can discuss whether a sufficient opportunity exists to negotiate a settlement in light of the engineering discussion.

I. IDENTITY OF PERSONS GIVING NOTICE AND THEIR COUNSEL

In accordance with 40 C.F.R. Section 135.3(b), the names, addresses, and telephone numbers of the Citizens giving notice, are as follows:

Suncoast Waterkeeper ("SCWK") is a non-profit public benefit corporation with members throughout Southwest Florida, including Pinellas County, dedicated to protecting and restoring the Florida Suncoast's waterways through fieldwork, advocacy, environmental education, and enforcement for the benefit of the communities that rely upon these precious coastal resources. SCWK has been registered as a not for profit corporation in Florida since 2012 and has maintained its good and current standing in Florida since that time. SCWK is a licensed member of Waterkeeper Alliance, Inc., an international non-profit environmental organization, made up of over 300 separate Waterkeeper programs, such as Suncoast Waterkeeper.

Our Children's Earth Foundation ("OCE") is a non-profit public benefit corporation with members throughout Southwest Florida, including in Pinellas County, dedicated to protecting the public, especially children, from the health impacts of pollution and other environmental hazards and to improving environmental quality for the public benefit. Another aspect of OCE's mission is to participate in environmental decision-making, to educate the public concerning environmental protection laws, and to enforce environmental laws (including via citizen suits), both federal and state, to reduce pollution. OCE has been registered as a foreign not for profit corporation in Florida since 2016 and has maintained its good and current standing in Florida since that time.

Tampa Bay Waterkeeper ("TBWK") is a non-profit public benefit corporation with members throughout the Tampa Bay watershed. Based in Pinellas County, Tampa Bay Waterkeeper is dedicated to protecting and improving the Tampa Bay watershed while ensuring swimmable, drinkable and fishable water for all. Tampa Bay Waterkeeper'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. TBWK has been registered as a not for profit corporation in Florida since 2017 and has maintained its good and current standing in Florida since that time. 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 Tampa Bay Waterkeeper.

Citizens' members use Tampa Bay, Boca Ciega Bay, the Gulf of Mexico and other adjoining waterways for body contact water sports and other forms of recreation, wildlife observation, aesthetic enjoyment, educational study, and spiritual contemplation. Citizens' members are concerned about water quality and will continue to be adversely affected by the City of Largo's sewage discharge violations. Redressing the violations alleged in this notice letter will redress the injuries or risks Citizens have suffered.

Citizens may be contacted at the following addresses:

Suncoast Waterkeeper P.O. Box 1028 Sarasota, FL 34230 Tel: (941) 275-2922 Email: jbloom@suncoastwaterkeeper.org	Our Children's Earth Foundation 1625 Trancas St. #2218 Napa, CA 94558-9998 Tel: (510) 910-4535 Email: annie.beaman@ocefoundation.org	Tampa Bay Waterkeeper 260 First Ave S, Box 226 St. Petersburg, FL 33701 Tel: (941) 915-0684 Email: chairman@suncoastwaterkeeper.org
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Citizens have retained the following legal counsel to represent them in this matter:

Justin Bloom, Esq. P.O. Box 1028 Sarasota, FL 34230 Tel: (941) 275-2922 Fax: (866) 574-2169 Email: bloomesq1@gmail.com	Kathryn Schmidt, Esq. Van Ness Feldman LLP 1050 Thomas Jefferson Street NW Washington, DC 20007 Tel: 303-298-1982 Fax: 202-338-2361 Email: kschmidt@vnf.com
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All communications should be addressed to legal counsel at the above addresses.

II. STATUTORY AND REGULATORY FRAMEWORK

The City of Largo 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 CWA. 33 U.S.C. § 1262(5). The City of Largo owns and operates the POTW and appurtenant collection system, which collectively is a publicly owned treatment works as defined in CWA Section 212(2), 33 U.S.C. § 1292(2), and 40 C.F.R. Section 125.58(s). The POTW and related

collection system collects and treats sanitary sewage from the City of Largo's residents and businesses.

The CWA prohibits the discharge of pollutants by any person to Waters of the United States except in compliance with a permit duly issued under the CWA. CWA § 301(a), 33 U.S.C. § 1311(a). The CWA authorizes EPA, or states with permit programs approved by EPA, to issue National Pollutant Discharge Elimination System ("NPDES") permits allowing for the discharge of pollutants into waters of the United States. CWA § 402, 33 U.S.C. § 1342. The Florida Department of Environmental Protection ("FDEP") has issued an NPDES Domestic Wastewater Facility Permit to the City of Largo for the Largo WWTF under Chapter 403, Florida Statutes (F.S.) and applicable rules of the Florida Administrative Code (F.A.C.): Permit No. FL0026603-013-DW1P/NR, effective February 26, 2019 through February 25, 2024 ("2019 NPDES Permit"). The previous NPDES permit issued for the Largo WWTF (FL0026603-007-DW1/NR) was effective for the period between October 26, 2012 and October 25, 2017, and was accompanied by Administrative Order No.: AO-152-SW (Order Establishing Compliance Schedule Under Section 403.088(2)(f), F.S.) ("AO-152") as a "specific requirement" of the permit (collectively "2012 NPDES Permit"). The Largo WWTF is required to comply with its NPDES Permits with respect to discharges from the POTW or its collection system, and the manner in which it operates and maintains the POTW.

The stormwater element of the federal NPDES program is mandated by CWA § 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 NPDES permit program in Florida. FDEP is authorized under Section 403.0885 of the Florida Statutes (F.S.) and Rule 62624 of the Florida Administrative Code (F.A.C.) to implement the NPDES program. As part of this program, FDEP has determined that a Municipal Separate Storm Sewer System (MS4) permit is required for the operation of Pinellas County's stormwater systems. FDEP issued MS4 Permit No. FLS000005-004 for Pinellas County with an issuance date of July 1, 2018 and an expiration date of June 30, 2023. The previous MS4 for Pinellas County (MS4 Permit No. FLS000005-003) was issued effective January 1, 2013 with an expiration date of December 31, 2017. MS4 Permit Nos. FLS000005-004 and FLS000005-003 are herein collectively referred to as the "MS4 Permits." The City of Largo is a "Permittee" under the MS4 Permits.

Under Florida state law, the City of Largo has been subject to a consent order and six amendments for 14 years: *Consent Order OGC No. 03-0666 (April 2006)*; *First Amendment to Consent Order (August 2009)*; *Second Amendment to Consent Order (September 2012)*; *Third Amendment to Consent Order (May 2016)*; *Fourth Amendment (January 2018)*; *Fifth Amendment (November 2018)*; *Sixth Amendment (May 2019)*. While the Consent Order and its amendments under state law include relaxed "interim limits" for many pollutants that are limited

under the NPDES Permit, they are not NPDES Permit modifications. Paragraph 15 of the Consent Order, as amended six times, specifically states as follows:

This Interim limit does not act as a State of Florida Department of Environmental Protection wastewater permit effluent limitation or modified permit limitation, nor does it authorize or otherwise justify violation of the Florida Air and Water Pollution Control Act, Part I, Chapter 403, Florida Statutes, during the pendency of the [Consent Order or Amendment].

The pollutant limits contained in the 2019 and 2012 NPDES Permits are the enforceable limits under the federal CWA, regardless of the State's actions under state law to provide "interim limits" that extend for years. Furthermore, the Consent Order and its amendments were issued under a state law that is not comparable to the CWA. *Suncoast Waterkeeper, et al. v. City of Saint Petersburg, Florida*, 2018 WL 502662 (M.D. Fla. January 20, 2018). Therefore, as a matter of law, these "interim limits" cannot relieve the City of its obligations to comply with its NPDES permit or shield the City from citizen suit enforcement of federal Clean Water Act requirements.

III. BACKGROUND

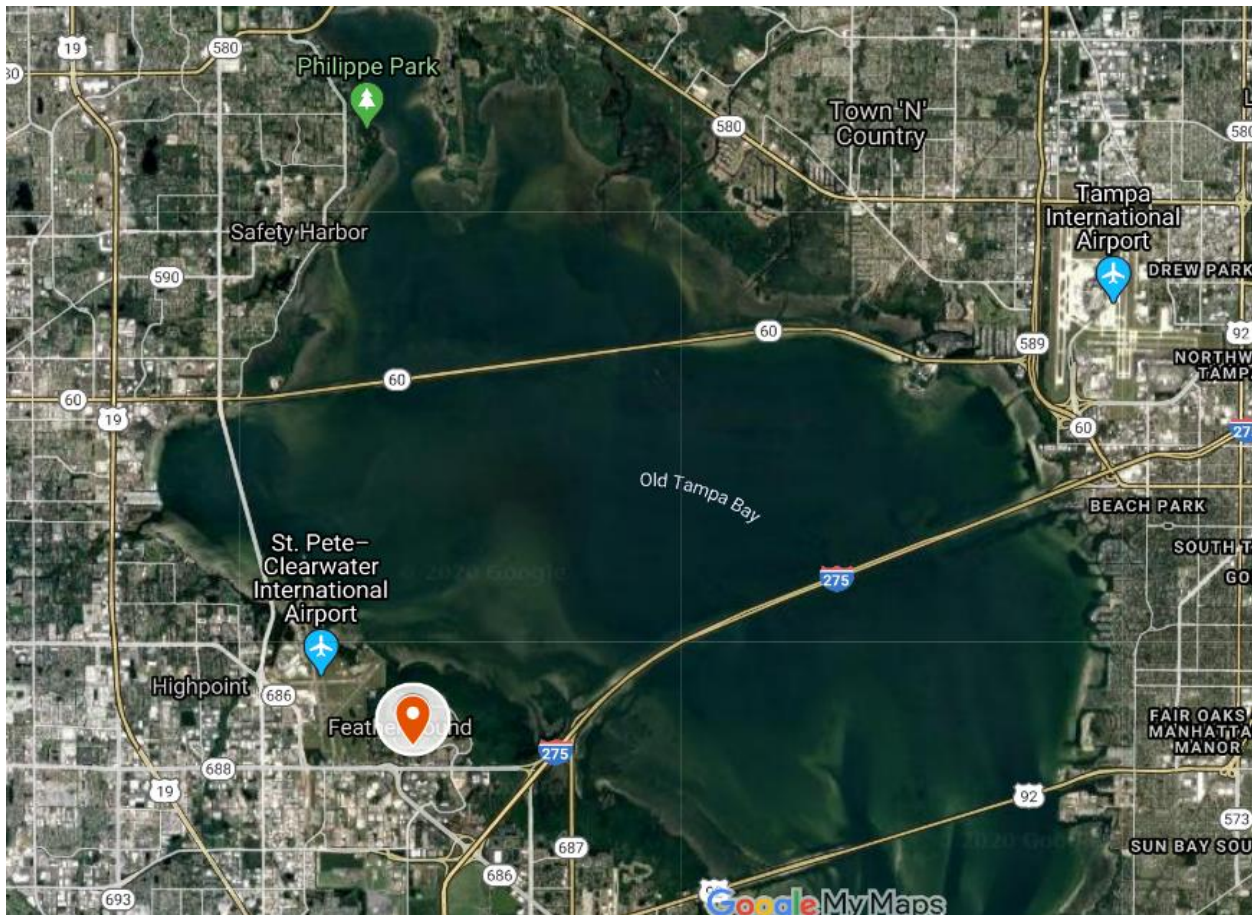
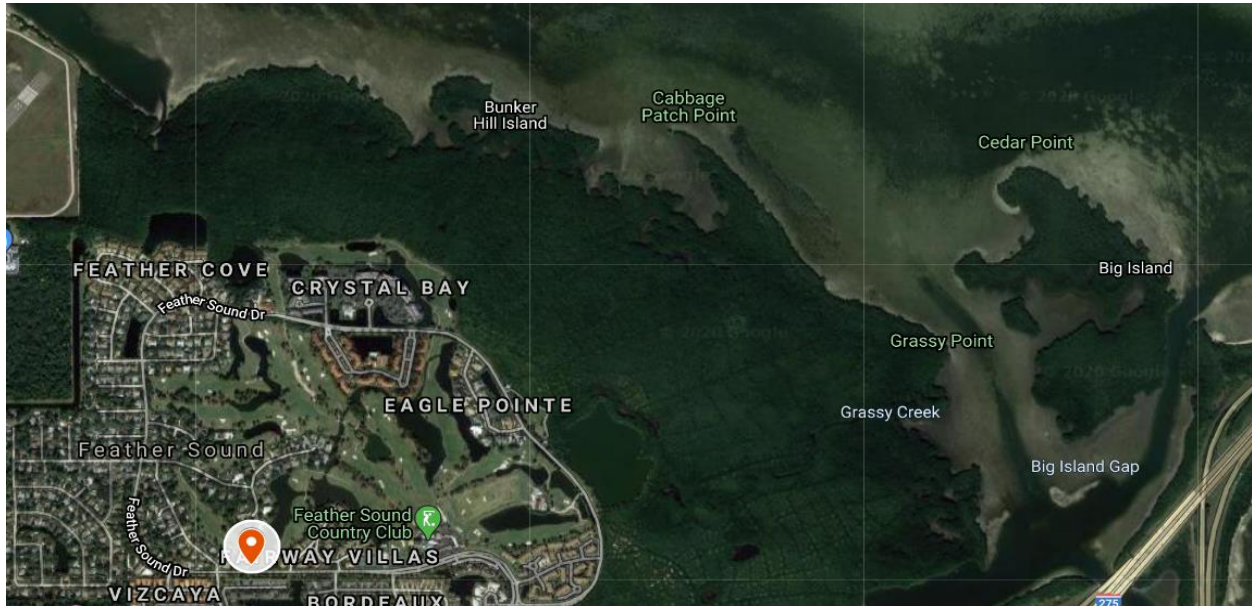
A. Description of Facilities

The City's POTW is located at 5100 150th Ave N, Clearwater, FL 33760. It is an 18.0 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 A2O process. "This facility is operated to provide advanced wastewater treatment (AWT) and high-level disinfected reclaimed water to a master reuse system within the City of Largo, the Carillon area and within the City of St. Petersburg, or to discharge effluent through an outfall to the stormwater system within Feather Sound and thence to Tampa Bay." *2019 NPDES Permit, "Wastewater Treatment" Section*. The point of discharge from the Largo WWTF is identified as Surface Water Discharge D-001, described in the 2019 NPDES Permit (at page 2) as follows:

[A]n 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.

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The maps below depict the NPDES point of discharge.



The wastewater collection system owned and operated by the City of Largo consists of approximately 320 miles of collection and transmission lines servicing an approximate 16 square mile area for more than 100,000 people. There are 52 wastewater lift stations throughout the wastewater collection system and over 5,400 manholes.

B. Facts related to the City's Violations of its NPDES Permit Effluent Limits

1. Total Nitrogen Limit of 19 Tons Per Year (5-Year Average)

In 1998, the EPA approved a Total Maximum Daily Load "TMDL" for Total Nitrogen ("TN") for Tampa Bay required by Section 303(d) of the federal CWA. In 2007, USEPA and FDEP advised the Tampa Bay Nitrogen Management Consortium that existing and future surface water discharge permit limits for entities discharging to Tampa Bay must not cumulatively exceed the federally-recognized TMDL for nitrogen loading, and that no new or renewed permits would be approved until facility-specific allocations consistent with the TMDL were developed. Over the course of several years, TN allocations were established for Tampa Bay, through a lengthy process among a large consortium of stakeholders, of which the City of Largo was a participant along with FDEP, EPA, Tampa Bay Estuary Program and other area municipalities and organizations. In 2009 the City of Largo joined the Tampa Bay Nitrogen Management Consortium in adopting a Nitrogen Management Action Plan, or Reasonable Assurance Plan ("RA"), agreeing to an allocation for TN of 19 tons/year (5-Year Average) and 28.5 tons/year Annual Total to meet the EPA approved TMDL for Total Nitrogen for Tampa Bay. FDEP adopted the 2009 RA on December 22, 2010 by Order. The collaborative efforts of the Consortium participants have resulted in proposed equitable nitrogen load allocations to 189 permitted and unpermitted sources throughout the watershed, collectively meeting the federally-recognized nitrogen TMDL for Tampa Bay.

Following the TMDL allocations, in October 2012, when FDEP renewed the City of Largo's NPDES Permit, FDEP added a limit on TN of 19 tons/year (5-Year Average) and 28.5 tons/year Annual Total, consistent with and specifically referencing the 2009 RA for TN allocated to the City of Largo,² but the 2012 NPDES Permit did not require the City to comply with those limits because the City represented that it would not be able to meet those limits given the loss of its reclaim water customers. The 2012 NPDES permit limit for TN required only that the City "report" its TN Annual Total and Five-Year Average, and FDEP issued an accompanying AO-152, which provided the City of Largo four (4) years to study and report methods for reducing its TN loads to the required TMDL levels, by October 2016. AO-152 is a specific requirement of the 2012 NPDES Permit.

² The prior NPDES Permit issued in July 2017 (FL0026603-006-DW1P/NR) did not contain a TN loading limit.

In October 2016, the City presented a report with alternatives to reducing its TN load from the Largo WWTF. *Hazen and Sawyer “Nitrogen Reduction Evaluation” (September 2016)*. The City also requested a one-year extension for its final report, until October 2017, which FDEP allowed. On October 24, 2017, the 2012 NPDES Permit term expired and was not renewed at that time, but its terms were to remain in force provided a “timely and sufficient” application for permit renewal was pending. *2012 NPDES Permit VIII.1*.

In November 2018, FDEP set an “interim limit” under state law for TN of 22 tons/year (5-Year Average) and 30 tons/year (Annual Total) with a vague and general direction to take “whatever corrective actions necessary” to achieve compliance by October 25, 2022 “with the Permit Limits for Total Nitrogen and load allocations of the Final 2009 Reasonable Assurance Addendum: Allocation and Assessment Report, January 22, 2010 which set forth the Total Nitrogen loading limits as 28.5 tons/year for the 12-month rolling total and 19.0 tons/year for the five-year average of the yearly totals.” *Fifth Amendment to Consent Order (November 2018)*.

Three months later, in February 2019, FDEP issued the City of Largo’s 2019 NPDES Permit, including a firm compliance limit for TN of 19 tons/year (5-Year Average) and 28.5 tons/year (Annual Total), consistent with and referencing the 2009 TMDL for TN allocated to the City of Largo. The 2019 NPDES Permit is effective for 5 years, from February 26, 2019 through February 25, 2024.

Three months after issuance of the 2019 NPDES Permit with a stated limit of 19 tons/year TN (5-Year Average), FDEP *increased* the “interim limits” under state law for TN for the 5-Year Average, to 26.5 tons/year until October 2022. *Sixth Amendment to Consent Order (May 2019)*.

For the last decade, the City of Largo has failed to reduce its TN levels down to the limit of 19 tons/year (5-Year Average) TMDL that it was allocated for Old Tampa Bay in 2009. In fact, the opposite has occurred: The City has *increased* its TN loading to a level that is now in excess of 27 tons/year (5-Year Average).³ The chart attached as Exhibit 1 to this letter reflects the increase in the City’s TN load in tons/year (5-Year Average) since January 2017 (based on the City’s Discharge Monitoring Reports (“DMRs”), as well as FDEP’s response under state law to *increase* the limits on the City rather than force measures to *reduce* the City’s TN discharges

³ Because the City’s DMRs appear to demonstrate the City is complying with the 2019 NPDES Permit’s TN limit of 28.5 tons/year (Annual Total), the Citizens do not allege continuing violations of the TN Annual Total limit at this time.

to ultimately meet its TMDL.⁴ All discharges in excess of the TN limit of 19 tons/year (5-Year Average) since March 2019 (which is when the 2019 NPDES Permit limits began to apply) are actionable violations of the 2019 NPDES Permit and the CWA, which are ongoing and will continue absent a court order ceasing this unlawful practice.

2. Dichlorobromomethane

For 14 years (since the 2006 Consent Order), the City has not exhibited any reduction in the Dichlorobromomethane concentration contained in its effluent, despite numerous consent order amendments extending it ample opportunity to do so. In fact, the opposite has occurred: The City has *increased* its discharge concentration, such that FDEP has elevated the “interim limit” under state law to a point that is now approximately *2.5 times the permit limit* (2019 NPDES Permit is 22 ug/L and the “interim limit” is 57 ug/L until October 2022).⁵ The City’s recent discharges are now consistently above 42 ug/L.

The chart attached to this letter as Exhibit 2 reflects the increase in Dichlorobromomethane concentrations since January 2017 (based on the City’s DMRs), as well as FDEP’s response to *increase* the limits on the City by way of consent order amendments rather than force measures to *reduce* the City’s unlawful Dichlorobromomethane discharges. All discharges in excess of the 2019 NPDES Permit limit of 22 ug/L Dichlorobromomethane since March 2019 (which is the month when the 2019 NPDES Permit limits began to apply) are actionable violations of the 2019 NPDES Permit and the CWA, which are ongoing and will continue absent a court order ceasing this unlawful practice.

3. Fecal Coliform Minimum Detection Limit

The 2019 NPDES Permit contains a minimum detection limit for fecal coliform of 75%. This same requirement also is contained in the 2012 NPDES Permit. The chart attached to this letter as Exhibit 3 reflects the City’s failure to meet the fecal coliform detection minimum since

⁴ The Citizens dispute the accuracy of the December 2019 value reported by the City because the City calculated the 5-Year Average based on a formula that is not authorized under the 2019 NPDES Permit.

⁵ FDEP’s “interim limits” under State law for Dichlorobromomethane span 16 years (2006-2022), as follows: 30 ug/L (Consent Order/April 2006), 30ug/L extended 3 years to 2012 (First Amendment/2009), 30ug/L extended 4 years to 2016 (Second Amendment/2012), 30 ug/L extended 4 years to 2018 (Third Amendment/2016); “interim limit” increased to 42.7 until 2019 (Fourth Amendment/January 2018), “interim limit” increased to 57 ug/L until 2022 (Fifth Amendment/November 2018). All of the City’s NPDES Permits have contained a compliance limit of 22 ug/L.

January 2017 (based on the City's DMRs), with recent violations occurring in eight of the 13 months since issuance of the 2019 NPDES Permit.

All discharges in violation of the fecal coliform minimum detection limit since July 2015 are actionable violations of the City's 2012 and 2019 NPDES Permits and the CWA, which are ongoing and will continue absent a court order ceasing this unlawful practice.⁶

C. Facts Related to the City of Largo's Sewage Spills

The City of Largo has repeatedly spilled raw sewage from the City's sewer lines, manholes, pump stations, and various other POTW equipment/conveyances that are part of the overall collection system and has discharged partially treated and reclaimed water from the Largo WWTF. A partial list of these sewage spills within the last five years, also known as sanitary sewage overflows or "SSOs" and unauthorized discharges is attached to this notice letter as Exhibit 4, and Citizens will amend the list of spills on Exhibit 4 if further review indicates that additional spills have occurred. A summary table of Exhibit 4 is below, indicating an approximate total volume of 50 million gallons illegally discharged in the last five years, with approximately 49 million gallons reaching surface waters and approximately 1.3 million gallons unlawfully discharged in 2019.

	Spill Volume	Volume to Surface Water
2015	10,445,877	10,106,579
2016	37,304,260	37,246,657
2017	438,130	335,475
2018	381,805	141,480
2019	1,343,410	898,740
2020	300,895	6,275
Total for last 5 years	50,206,877	48,729,206

These sewage spills have sent raw sewage streaming into streets, residences, storm drains and/or adjacent surface waters, posing serious public health threats and creating a severe nuisance in exposing substantial numbers of people to raw sewage. Raw sewage contains a

⁶ While the chart attached as Exhibit 3 to this letter reflects the City's compliance history since January 2017, any violations from July 2015 to the present are actionable.

variety of human bacteriological, viral, and parasitic pathogens, and exposure to raw sewage is well known to cause various human illnesses. In addition to human waste, sanitary sewage contains various toxic chemicals from the solvents, detergents, cleansers, inks, pesticides, paints, pharmaceuticals and other chemicals discarded by households and businesses. Thus, the City of Largo's sewage spills pose a serious public health risk in exposing members of the public and Citizens' members to sewage borne pathogens and various toxic pollutants. As discussed below, these persistent, repeated illegal sewage spills also cause serious harm to sensitive freshwater and marine environments in area waters, as the excessive nutrient loading and pathogens and toxic pollutants in sewage adversely affect freshwater and marine life.

These unlawful spills have been caused by a variety of delayed and inadequate system maintenance, operation, repair, replacement and rehabilitation practices. These poor practices have led to unaddressed defects in sewer lines such as extensive line cracking, sags in lines, and misaligned joints; broken sewer lines, pump station equipment and force-main failures; undersized sewer lines or pump station pumping and/or storage capacity; the overwhelming of system capacity due to excessive infiltration and inflow of storm water and groundwater during wet weather; and sewer line blockages (generally caused by buildup of grease, accumulation of sediment and debris, and root intrusion).

Until the City accelerates its timeline of collection system repairs under federal court order to adequately address the underlying causes of the City's pervasive SSO problems (inflow and infiltration, power and equipment failures, and blockages), the City will continue to cause unlawful spills.

D. Facts Related to the Receiving Waters

The City's illegal discharges are harmful to the following receiving surface water bodies and their associated ecosystems: Old Tampa Bay, Cross Bayou, Lake Seminole, Mckay Creek, Seminole Bypass Canal, Clearwater Harbor, Allen Creek, Church Creek, Rattlesnake Creek, and Boca Ciega Bay.

Old Tampa Bay, Tampa Bay and the Gulf of Mexico

Old Tampa Bay is suffering from excessive pollution and is listed on the State of Florida's CWA Section 303(d) list of impaired water bodies. A water body that is listed 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 impaired by Mercury, Bacteria and Nutrients.

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. In 1980, all municipal wastewater treatment plants were required to provide 100% reuse or Advanced Wastewater Treatment (AWT) for discharges directly to the bay and its tributaries. As discussed above, in 2009, the nitrogen wasteload allocations among surface water dischargers were equitably distributed across all sectors and sources of nitrogen loading within the basin, as well as the total maximum loading of nitrogen to each major bay segment. The City of Largo agreed to an allocation of a 5-Year Average TMDL Equivalent Load of 19 tons/year of Nitrogen in this “Reasonable Assurance Plan.” Yet since at least 2012, the City has discharged well in excess of its allotment and does so to this day.

Today, Old Tampa Bay is not in consistent compliance with the TMDL for chlorophyll-A. The City of Largo’s persistent unlawful exceedances of its TN allocation and NPDES Permit are a significant contributor to chlorophyll-A in Old Tampa Bay and explain the failure to attain the TMDL for chlorophyll-A in 2019, 2017 and 2015. Likewise, the Citizens and their members believe the City of Largo’s persistent exceedances of the TMDL allocation for Total Nitrogen have been major contributors to increased harmful algal blooms in Old Tampa Bay, such as the toxic phytoplankton species *Pyrodinium bahamense*, *Pseudo-nitzschia*, dinoflagellate *Karlodinium* and likely contributes to Red Tide (*Karenia Brevis*) blooms elsewhere in the Tampa Bay Estuary.

Since the 1980’s, Tampa Bay has seen significant recovery of seagrass population, which is essential to the health of estuarine waters. However, Feather Sound, where the City of Largo discharges its treated effluent (*see above diagrams*), historically has seen poor recovery and decline in recent years. High levels of Nitrogen in the effluent from the City of Largo surface water discharge is a significant contributor to poor water quality and fetters the collaborative efforts of stakeholders throughout the region towards seagrass recovery and protection.

In addition to Largo’s contribution of excessive Nitrogen into area waters, raw and partially treated sewage flowing into Old Tampa Bay from the City’s spills contains a variety of human bacteriological, viral, and parasitic pathogens, and exposure to raw and partially treated sewage is well-known to cause various human illnesses. In addition to human waste, sanitary sewage contains various toxic chemicals from the solvents, detergents, cleansers, inks, pesticides, paints, pharmaceuticals and other chemicals discarded by households and businesses.

Thus, the City of Largo's sewage spills pose a serious public health risk in exposing members of the public and SCWK, TBWK and OCE's members to sewage-borne pathogens and various toxic pollutants. These persistent, repeated sewage spills also have threatened harm to the sensitive marine environment of Old Tampa Bay, as the pathogens and toxic pollutants in sewage adversely affect marine life. The receiving waters of Old Tampa Bay are shared with, connected to and subsequently flow into the rest of Tampa Bay, its estuary and the Gulf of Mexico, resulting in the harmful addition of the pollutants described above (i.e., pathogens, nutrients, and various toxic chemicals) to these waters.

The coastal waters of Pinellas County, including those in and around the City of Largo are designated as the Pinellas County Aquatic Preserve and are afforded special significance and protection as "Outstanding Florida Waters," pursuant to 62-302.400 F.A.C., because of their natural attributes.

Cross Bayou, Long Bayou, Boca Ciega Bay, and the Gulf of Mexico

The Cross Bayou Canal receives the City's effluent when necessary to alleviate the effects of effluent on Feather Sound along with SSOs from the City's wastewater collection and transmission system. Like Old Tampa Bay, 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. It is impaired by Dissolved Oxygen, Enterococci, Mercury, Nutrients (Chlorophyll-A) as well as Total Nitrogen. Cross Bayou Canal connects Old Tampa Bay to Long Bayou, which is impaired by 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, its greater estuary and the Gulf of Mexico.

Boca Ciega Bay Aquatic Preserve and its waters are designated Outstanding Florida Waters, pursuant to 62-302.400 F.A.C., as worthy of special water quality protections because of their natural attributes.

E. FACTS RELATING TO LACK OF STATE AND FEDERAL ENFORCEMENT

The City has a history of SSOs and noncompliance with its NPDES Permits at the Largo WWTF. The State issued Consent Order OGC No. 03-0666 under state law 14 years ago (April 2006), which it has since amended *six times*, essentially tacitly acquiescing in the City's

noncompliance with its NPDES Permit rather than enforcing the Permit.⁷ The Consent Order and its six amendments under state law consistently contain vague and general language that the City “shall take whatever corrective actions are necessary to meet the limit for [pollutant] in the Facility’s effluent” by a stated deadline, allow “interim” limits in the meantime. Consent Order at ¶¶ 14-15, First Amendment at ¶¶ 14-15, Second Amendment at ¶¶ 14-15, Third Amendment at ¶¶ 14-15, Fourth Amendment at ¶¶ 14-15, Fifth Amendment at ¶¶ 14-15, Sixth Amendment at ¶ 15. The State’s consent order amendment and “interim limit” process under state law has not brought the City into compliance. Instead, the State’s actions have resulted in continuing and worsening violations.

For Dichlorobromomethane, the 2006 Consent Order and its first five amendments issued over a 12-year span (2006-2018) under state law have allowed the City a total of 16 years (2006 to 2022) of excessive Dichlorobromomethane concentrations in its effluent, which have increased steadily over time. *See also footnote 5, supra*. The 2019 NPDES Permit sets a limit of 22 ug/L. The State is now permitting discharges at over two times that level under state law until October 2022, at 57 ug/L. *Fifth Amendment to Consent Order (November 2018)*.

For the TN (5-Year Average), FDEP likewise has allowed the City until October 2022 to come into compliance with the TN limit of 19 tons/year (5-Year Average) consistent with the 2009 TMDL allocation, which is 12 years total time from the TMDL allocation to the City. *Fifth Amendment to Consent Order (November 2018)* (“interim limit” of 22 tons/year TN (5-Year Average) until October 2022) and *Sixth Amendments to Consent Order (May 2019)* (“interim limit” raised to 26.5 tons/year TN (5-Year Average)). As of the date of this letter, the Citizens can find no public record of a penalty assessment ever assessed by FDEP against the City for exceeding 19 tons/year TN (5-Year Average) in the 2019 NPDES Permit or the “interim limits” set forth in the Consent Order amendments, despite a clear awareness of the City’s failure to lower its TN load.

As to the City’s SSOs and unauthorized discharges, the Consent Order and its amendments under state law have not been effective given the City’s spill history. Although the City has been working on its collection system since, it continues to experience recent wet-weather spills (50 million gallons since July 2015). The Consent Order and relevant amendments related to the collection system have not yet brought the City into compliance. In addition, the inflow and infiltration affecting the City’s collection system during wet weather

⁷ The Consent Order and its Amendments appear to have been issued every 3-4 years and then narrow in frequency, with two most recent amendments issued only 6 months apart: Consent Order (April 2006); First Amendment (August 2009); Second Amendment (September 2012); Third Amendment (May 2016); Fourth Amendment (January 2018); Fifth Amendment (November 2018); Sixth Amendment (May 2019).

contributes to excessive flows that push the TN load out of compliance with the City's TMDL allocation and 2019 NPDES Permit limit of 19 tons/year (5-Year Average).

The effect of the State's perpetual and now-frequent Amendments to the Consent Order under state law has resulted in a pattern of non-compliance for TN (5-Year Average) and Dichlorobromomethane, disregard for the federal NPDES Permit, and a corresponding trend of an *increase* over time for those pollutants such that the City is now consistently discharging well over the limits stated in its federal 2019 NPDES Permit every month since issuance and exceeding even the relaxed "interim" limits for TN (5-Year Average) under state law. The U.S. Environmental Protection Agency has taken no enforcement action against the City for the violations described in this letter.

Plaintiff Citizens are compelled to initiate this action to seek a federal court injunction that will require the City to come into immediate compliance with its 2019 NPDES Permit and the CWA and bring to a close this unending permissive practice by the State.

IV. VIOLATIONS OF THE FEDERAL CLEAN WATER ACT

Claim 1: Violations of the City's NPDES Permit Effluent Limitation

The 2012 and 2019 NPDES Permits authorize the City to discharge effluent from the Largo WWTF to Waters of the State in accordance with effluent limitations, monitoring requirements, and other provisions as set forth in the permit. The City of Largo is the owner and/or operator of the POTW.

Every violation of the 2019 NPDES Permit effluent limitations found in Part I.A.1 ("Surface Water Discharges") for Total Nitrogen (19 TPY maximum, 5 Year Average), Dichlorobromomethane (22.0 ug/L maximum Annual Average), Coliform, Fecal % less than detection (75% monthly minimum) is a separate violation of Section 301 of the CWA for which a civil penalty for each day of each permit violation can be assessed up to \$55,800 per violation occurring after November 2, 2015 and \$37,500 per violation occurring before November 2, 2015. 40 C.F.R. § 19.4 (effective Jan. 13, 2020). Every violation of the 2012 NPDES Permit effluent limitations found in Part I.A.1 ("Surface Water Discharges") Fecal % less than detection (75% monthly minimum) is a separate violation of Section 301 of the CWA for which a civil penalty for each day of each permit violation can be assessed up to \$55,800 per violation occurring after November 2, 2015 and \$37,500 per violation occurring before November 2, 2015. 40 C.F.R. § 19.4 (effective Jan. 13, 2020).

Claim 2: Unpermitted Discharges, in Violation of Section 301(a) of the Clean Water Act

The City of Largo has repeatedly unlawfully spilled raw and partially treated sewage from its sewage collection system and the Largo WWTF. Most of these sewage spills and overflows have flowed directly into Waters of the United States. Section 301(a) of the CWA prohibits the discharge of untreated sanitary sewage or reclaimed water into Waters of the United States:

Except as in compliance with this section and sections . . . 1342 [which provides for NPDES permit authorization for pollutant discharges] . . . the discharge of any pollutant by any person shall be unlawful. 33. U.S.C. §1311(a).

Waters to which the City's discharges have occurred include Old Tampa Bay, Cross Bayou, Lake Seminole, McKay Creek, Seminole Bypass Canal, Clearwater Harbor, Allen Creek, Church Creek, Rattlesnake Creek, and Boca Ciega Bay, and streams and other Waters that are tributaries to Tampa Bay and the Gulf of Mexico. All such discharges are unpermitted discharges in violation of the City's sanitary sewer 2019 NPDES Permit and Section 301(a) of the CWA.

Every spill listed on Exhibit 4 that discharged into surface waters constitutes an unpermitted discharge in violation of Section 301 of the CWA for which a civil penalty up to \$55,800 per violation occurring after November 2, 2015 and \$37,500 per violation occurring before November 2, 2015. 40 C.F.R. § 19.4 (effective Jan. 13, 2020).

Claim 3: Sewage Discharges to the City's MS4, in Violation of Part I.D of the MS4 Permit

Sanitary sewer overflows from the City's collection system flowed and continue to flow into the City's MS4. By way of example, a partial list of these sanitary sewer overflows is attached as Exhibit 4. This partial list indicates the date and location of these sewage overflows and identifies whether they entered Waters of the United States and/or the MS4. All the sewage spills identified on Exhibit 4 as having reached the stormwater system are examples of illegal sewage spills that the City has discharged into the MS4.

Part I.D of the MS4 Permit 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. 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 clearly a violation of the MS4 Permit. Each day the City fails to meet the requirements of this permit condition is a separate violation of both the MS4 Permit and the CWA for which a civil penalty of up to \$55,800 per violation occurring after November 2, 2015 and \$37,500 per violation occurring before November 2, 2015. 40 C.F.R. § 19.4 (effective Jan. 13, 2020).

Claim 4: 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

Part IX.7 of the City's 2019 NPDES Permit requires the City to properly operate and maintain the Largo WWTF facility and related appurtenances, as follows:

The permittee shall at all times properly operate and maintain the facility and systems of treatment and control, and related appurtenances, that are installed and used by the permittee to achieve compliance with the conditions of this permit. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to maintain or achieve compliance with the conditions of the permit.

The City's persistent and extensive CWA violations described herein evince mismanagement of the wastewater system as a whole. The City has been unwilling to take the actions necessary to comply with the terms of its NPDES and MS4 Permits, which has led to hundreds of known violations. Mismanagement of the City's various permit conditions, including the requirement to operate and maintain all systems, are core reasons why the City has failed to comply with the CWA.

Failure to properly operate and maintain an NPDES-permitted facility is a continuing violation for which no statute of limitation applies. Accordingly, the City is subject to civil penalties of up to \$55,800 for each day of violation after November 2, 2015 and \$37,500 per each day of violation occurring before November 2, 2015. 40 C.F.R. § 19.4 (effective Jan. 13, 2020).

V. CONCLUSION

Due to the high number, high volume and repetitive nature of the City's violations, the Citizens assert that the Largo WWTF and the City's sanitary sewer collection system have been constructed, managed and operated such that the 2019 NPDES permit violations, unpermitted

discharges and CWA violations will continue. It is therefore likely that the City will remain in a perpetual state of noncompliance with the CWA until the City constructs capital improvements and/or permanently modifies its operations to ensure permit violations do not recur and sanitary sewer overflows cease.

To remedy these violations, the City must take and/or accelerate steps to improve, repair and properly maintain the Largo WWTF, the collection system, and all other related appurtenances. The Citizens are aware that the City has been working on its collection system and the Largo AWWT and that the high flows experienced by the City during wet weather have contributed to the high levels of TN (5-Year Average). However, the City's efforts have not produced any decline in the TN load -- the TN load has been increasing over time -- and wet-weather-related spills and unauthorized discharges continue to occur. The City's considerable delay in taking the necessary measures to comply with its NPDES Permit and the CWA requires that a civil penalty remove the economic benefit to the City resulting from its delayed and avoided expenditures. 33 U.S.C. §1365(d).

The Citizens believe that a prompt and efficient negotiated settlement for necessary work and firm timelines, memorialized through a court-approved federal consent decree which includes appropriate civil penalties, is preferable to protracted litigation. If unable to reach an enforceable settlement agreement with the City, the Citizens, through their counsel, are prepared to file suit in the United States District Court for the Middle District of Florida pursuant to Section 505(a) of the CWA after sixty days from the date of this letter. 33 U.S.C. §1365(a). This lawsuit will seek injunctive relief, appropriate monetary civil penalties, fees and costs of litigation, and such other relief as the court deems appropriate.⁸ The City's failure to remedy any of the violations set forth in this letter can result in a court order enjoining further violations and imposing civil penalties of \$55,800 per violation per day for each violation of the CWA.

If the City desires to institute negotiations in lieu of a civil action for a prompt and efficient resolution of this matter within the 60-day statutory notice period, we urge you to contact the undersigned to arrange for the meeting requested above. Please be advised that the Citizen Plaintiffs do not intend to delay filing of this suit once the 60-day notice period has expired.

⁸ In addition to the violations set forth above, as noted, this notice covers all ongoing CWA violations and violations evidenced by information that becomes available to Citizens after the date of this Notice of Intent to File Suit.

City of Largo Sixty-Day Notice
May 29, 2020

Sincerely,

A handwritten signature in blue ink, appearing to read "Justin Bloom", with a stylized flourish at the end.

Justin Bloom, Counsel for the
Environmental Groups

cc:

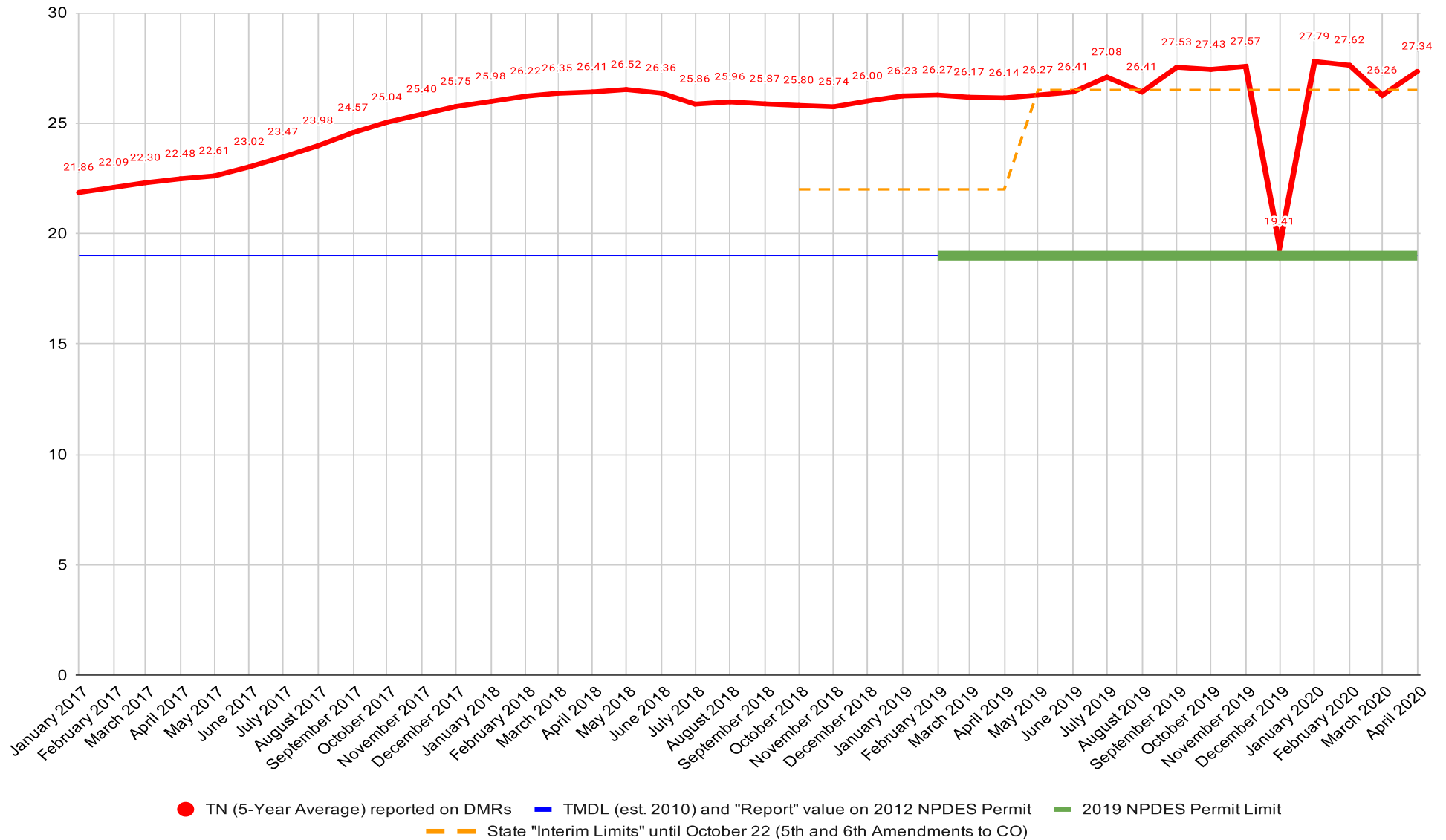
Andrew Wheeler, Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460
Wheeler.andrew@epa.gov

Mary S. Walker, Regional Administrator
EPA Region 4
Sam Nunn Atlanta Federal Center
61 Forsyth St. SW
Atlanta, GA 30303-8960
Walker.mary@epa.gov

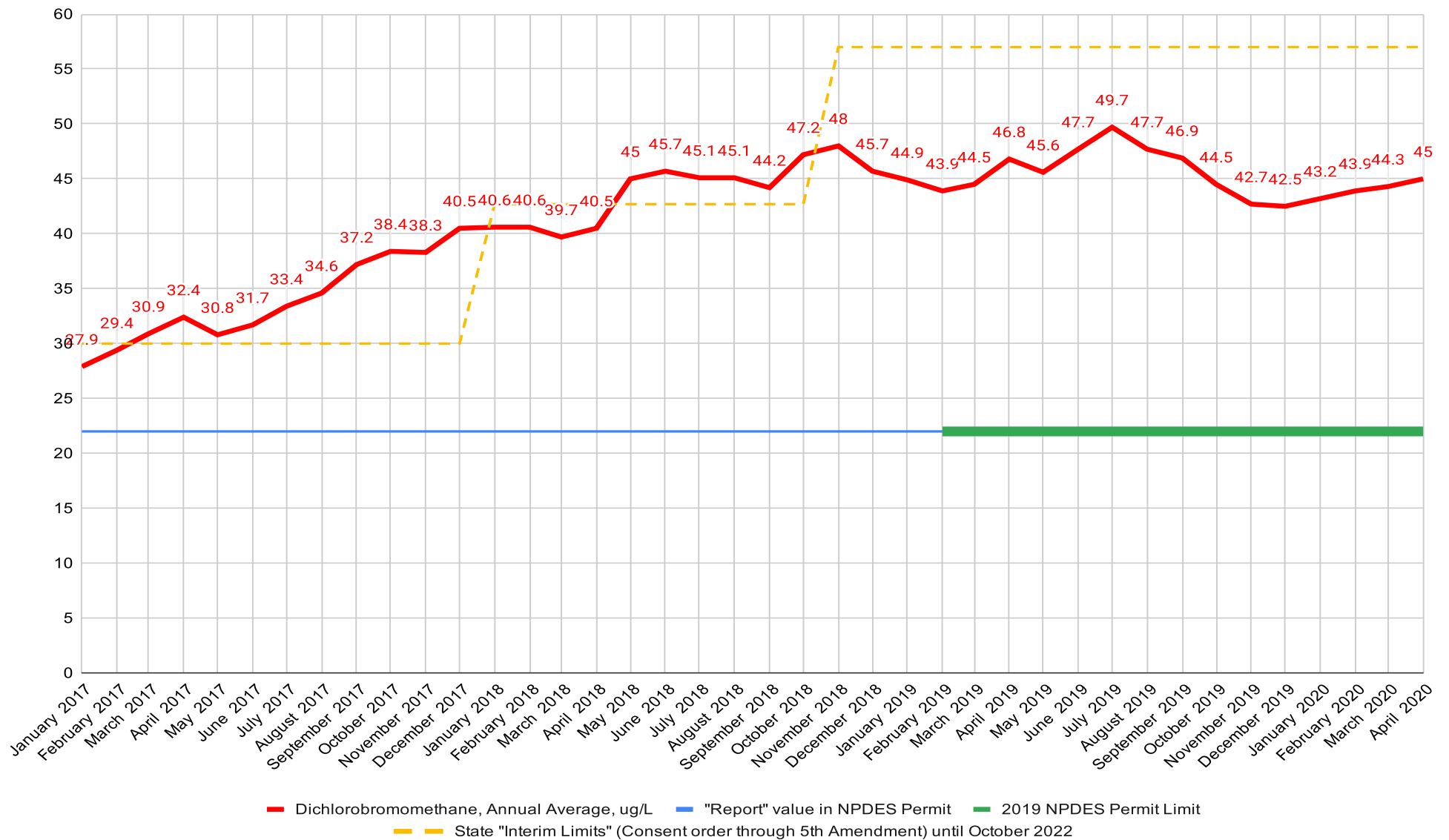
Brian Armstrong Executive Director
Southwest Florida Water Management
District 2379 Broad St.
Brooksville, FL 34604
brian.armstrong@watermatters.org

Noah Valenstein, Secretary Florida Department
of Environmental Protection 3900
Commonwealth Blvd., MS 49
Tallahassee, FL 32399-3000
noah.valenstein@dep.state.fl

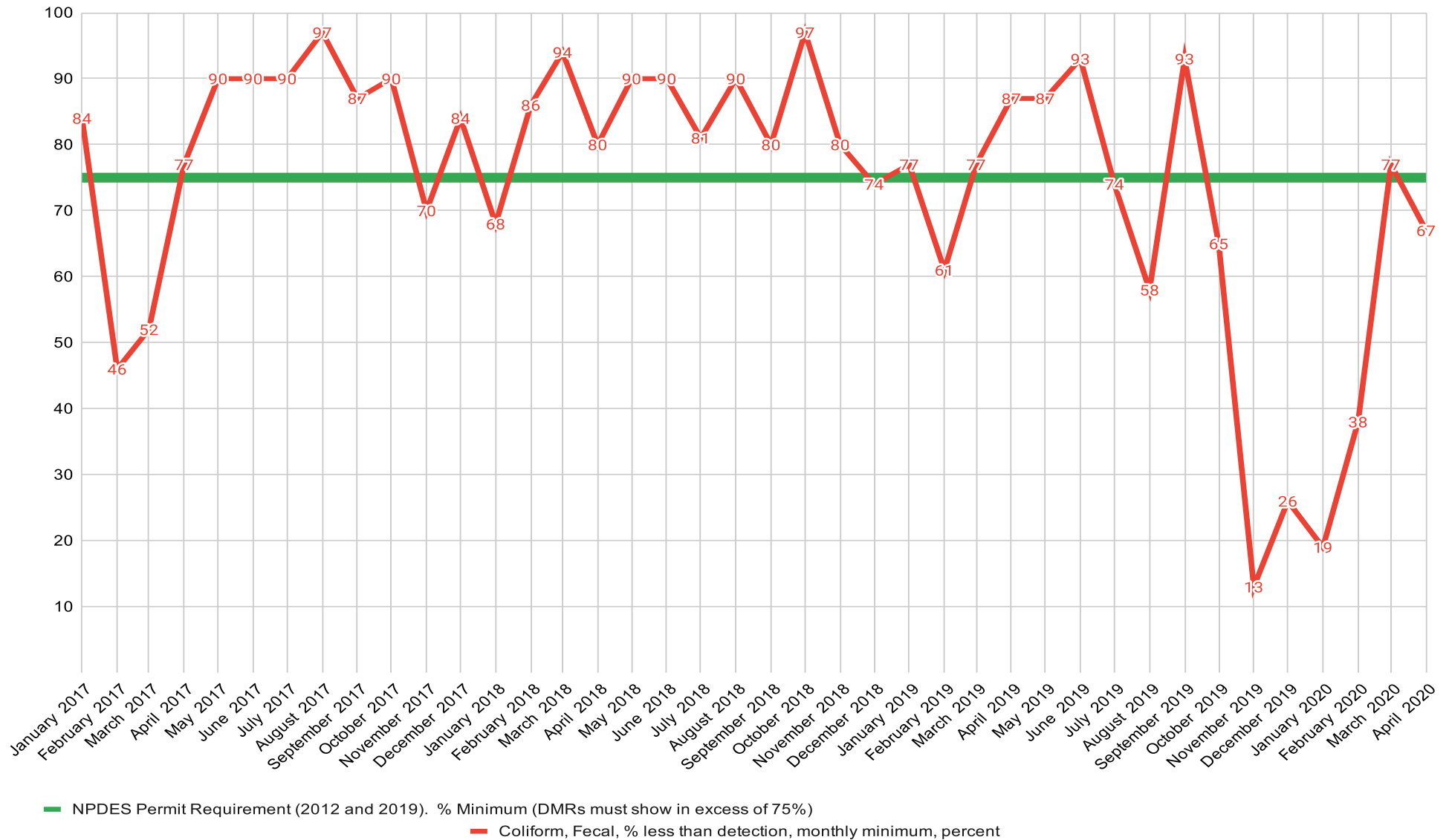
Total Nitrogen tons/year (5-Year Average) Limit (January 2017-Present)



Dichlorobromomethane (January 2017 to Present)



NPDES Permit Requirement (2012 and 2019): Coliform, Fecal, % less than detection, monthly minimum



THE CITY OF LARGO'S SANITARY SEWER OVERFLOWS AND UNAUTHORIZED DISCHARGES FROM JULY 2015 TO PRESENT

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)
			289				TOTALS	50,206,877	48,729,204	949,617				139	52
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 Av 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 Crescent 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	0	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
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

THE CITY OF LARGO'S SANITARY SEWER OVERFLOWS AND UNAUTHORIZED DISCHARGES FROM JULY 2015 TO PRESENT

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			289				TOTALS	50,206,877	48,729,204	949,617				139	52
2015	08/17/15	08/17/15	1	Harmony Dr & Rosery Rd	raw sewer	manhole	grease, I and I	750	250	0	8/17/2015	not provided	na	1	0
2015	08/17/15	08/18/15	2	Donegan Rd	raw sewer	manhole	I and I, 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
2016	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
2016	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 maine	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	wwrf 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 Starky Rd.	raw sewer	manhole overflow	other - flooding	1,000	1,000	1,000	6/7/16	Boca Ciega Bay	Seminole bypass canal	1	1
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 Starky 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

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			289				TOTALS	50,206,877	48,729,204	949,617				139	52
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			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			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		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 specified	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		1	1
2016	07/25/16	07/25/16	1	15400 Roosevelt Blvd	raw sewer	manhole	grease	450	450	0	7/25/16			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			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		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			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		8/9/16			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		8/10/16			1	0
2016	08/12/16	08/12/16	1	Del Robles Terrace	raw sewer	manhole	pump failure	1,875	1,875		8/12/16			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			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		1	0

THE CITY OF LARGO'S SANITARY SEWER OVERFLOWS AND UNAUTHORIZED DISCHARGES FROM JULY 2015 TO PRESENT

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)
			289				TOTALS	50,206,877	48,729,204	949,617				139	52
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		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			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		1	
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		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		1	
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		1	
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		1	
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		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		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		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		9/2/16			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		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		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		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		10/5/16	Old Tampa Bay		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		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			1	1
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		10/19/2016			1	0
2016	10/21/16	10/21/16	1	584 Forest Parkway	untreated wastewater	level pressure transducer	failure	100			10/21/2016			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		10/27/16			1	0
2016	10/30/16	10/30/16	1	Country Club Dr.	untreated wastewater	cleanout	pump failure	1,500	1,100		10/30/16			1	0
2016	10/30/16	10/30/16	1	Donegan Rd & Lake Avenue SE	untreated wastewater	bypass hose	overflow	100	100		10/30/16			1	0

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			289				TOTALS	50,206,877	48,729,204	949,617				139	52
2016	11/04/16	11/04/16	1	200 Country Club Dr.	untreated wastewater	cleanout	overflow	225	225		11/4/16			1	0
2016	11/08/16	11/08/16	1	1100 Ponce de Leon Blvd.	untreated wastewater	manhole	overflow	50	50		11/8/16			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		11/28/16			1	1
2016	12/01/16	12/01/16	1	712 Shore Dr & Seacrest	raw sewage	manhole	grease	750	750		12/1/16			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		12/5/16			1	1
2016	12/20/16	12/20/16	1	2728 Forest Pkwy & Oakwood Dr.	raw sewage	manhole	pump failure	500	475		12/20/16	Allens Creek		1	1
2016	12/20/16	12/20/16	1	584 Forest Parkway	untreated wastewater	manhole	component failure	475	475		12/20/16	Allens Creek		1	0
2017	01/28/17	01/28/17	1	200 Country Club Drive & Judy Lee Dr	raw sewage	manhole	overflow	500	500		02/03/17			1	0
2017	01/28/17	01/28/17	1	12991 Sophia Circle & Wilcox Road	wastewater	gravity line	grease	500	500		01/28/17			1	0
2017	02/08/17	02/08/17	1	13455 Wilcox Road	raw sewage	lift station	power failure	189,000	187,000		02/08/17			1	0
2017	03/06/17	03/06/17	1	10500 Ulmerton Road	raw sewage	manhole	blockage	1,000			03/06/17			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		04/02/17			1	0
2017	05/23/17	05/23/17	1	13630 50th Way North	raw sewage	manhole	roots	825			05/23/17			0	0
2017	06/01/17	06/01/17	1	632 Shore Drive	raw sewage	manhole	grease	100	90		06/01/17			1	1
2017	06/26/17	06/26/17	1	1145 Ponce de Leon Blvd	sanitary wastewater	manhole	blockage	9,000			06/26/17			0	0
2017	06/30/17	06/30/17	1	200 Country Club Dr & Judy Lee Dr	raw sewage	manhole	overflow	3,750	3,750		06/30/17			1	0
2017	07/11/17	07/11/17	1	13455 Wilcox Rd & Sophia Circle	raw sewage	lift station	overflow	30,000	30,000		07/11/17		Church Creek	1	1
2017	07/24/17	07/24/17	1	Eastwood Shores & Bough	raw sewage	manhole	overflow	4,800	4,800		07/24/17		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		07/31/17			1	0
2017	08/01/17	08/01/17	1	13101 Belcher Rd & Ulmerton Rd	raw sewage	force main	damage by contractor	60,000			08/01/17			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		09/09/17			1	0

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			289				TOTALS	50,206,877	48,729,204	949,617				139	52
2017	08/15/17	08/15/17	1	15080 Verona Avenue & 150th Avenue	raw sewage	manhole	overflow	220			08/15/17			0	0
2017	08/21/17	08/21/17	1	City of Largo WWRF & 49th Street	raw sewage	WWRF influent	overflow	10,000			08/21/17			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		08/24/17			1	1
2017	08/28/17	08/28/17	1	13455 Wilcox Rd & Sophia Circle	raw sewage	manhole	overflow	5,250	5,250		08/28/17			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		09/11/17	Largo Nature Preserve		1	0
2017	09/11/17	09/11/17	1	1754 Indian Rocks Rd & Penelope Lane	raw sewage	manhole	overflow	4,875	4,875		09/11/17			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		9/11/17			1	0
2017	09/11/17	09/11/17	1	1942 Cove Dr & Indian Rocks Road	raw sewage	manhole	overflow	2,875	2,875		09/11/17			1	0
2017	09/11/17	09/11/17	1	3884 Anglers Lane & Indian Rocks Rd	raw sewage	manhole	overflow	3,500	3,500		09/11/17			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		9/11/17			1	0
2017	09/12/17	09/12/17	1	2326 Seton Lane & Edgewater	raw sewage	manhole	power failure	300	300		09/12/17	Mckay Creek		1	1
2017	09/21/17	09/21/17	1	13455 Wilcox Road & Sophia Circle	raw sewage	manhole	damage by contractor	33,750	33,250		09/21/17		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			10/08/17			0	0
2017	11/02/17	11/02/17	1	2397 Crescent Dr	wastewater	lift station	equipment	7,400			11/02/17	Mckay Creek		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		01/08/18	Mckay Creek		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			01/26/18			0	0
2018	02/23/18	02/23/18	1	1145 Ponce de Leon	raw sewage	manhole	blockage	19,250	19,250		02/23/18	Belleair Creek		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			1	1

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			289				TOTALS	50,206,877	48,729,204	949,617				139	52
2018	06/14/18	06/15/18	2	Country Club Dr.	raw sewage	manhole	overflow	1,450	1,450		06/15/18	Starkey Road Basin		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		1	1
2018	07/02/18	07/02/18	1	3051 Tech Drive & 34th Street	raw sewage	manhole	pump failure	150			07/02/18			0	0
2018	07/09/18	07/09/18	1	3051 Tech Dr & 34th St N	raw sewage	manhole	overflow	100			07/09/18			0	0
2018	07/16/18	07/16/18	1	14623 54th Way N & 150th Ave	raw sewage	manhole	grease	1,800	1,700		07/16/18	Cross Bayou Basin		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		07/27/2018		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		07/28/18			1	1
2018	08/13/18	08/13/18	1	2350 Seton Lane	wastewater	manhole	sand/grease	88,500	84,500		08/13/18			1	0
2018	08/14/18	08/14/18	1	301 Seacrest Drive & Keene Park Drive	wastewater	manhole	grease	200			08/14/18			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		08/30/18	Intercoastal Waterway		1	0
2018	08/29/18	08/29/18	1	1100 Belcher Rd.	wastewater	manhole	overflow	24,750			08/30/18			0	0
2018	10/07/18	10/07/18	1	3666 135th Avenue N & Coral Way	wastewater	clean out	blockage	5			10/07/18			0	0
2019	01/10/19	01/10/19	1	WaterChase Apartments and Madison at Largo Apartments	wastewater	manhole	blockage	59,350	58,350	58,350	01/10/19	Long Bayou		1	1
2019	04/03/19	04/03/19	1	Carr Ruben Ctr & 56th Court	raw sewage	force main	damage by contractor	2,400		1,200	04/03/19			0	1
2019	04/30/19	04/30/19	1	9025 Ulmerton Rd.	wastewater	grease interceptor	overflow	60			04/30/19			0	0
2019	06/12/19	06/12/19	1	Twigg Terrace, 130th Ave. & 137th Ave	wastewater	manhole	damage by contractor	800			06/12/19			0	0
2019	06/14/19	06/14/19	1	1019 Woodbrook Dr. S	untreated wastewater	unknown	unknown	225	225	225	06/14/19			1	1
2019	06/27/19	06/27/19	1	5100 150th Ave. N	untreated wastewater	unknown	unknown	200			06/27/19			0	0
2019	07/08/19	07/09/19	2	2200 Lake Avenue SE & Ulmerton Road	wastewater	gravity line	damage by contractor	1,600			07/08/19	Long Bayou		1	1

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			289				TOTALS	50,206,877	48,729,204	949,617				139	52
2019	07/25/19	07/25/19	1	5100 150th Avenue North, Clearwater	wastewater	overflow at plant	high rain event	1,950			07/25/19			0	0
2019	07/26/19	07/26/19	1	5100 150th Avenue North	partially treated wastewater	pipe	break-in-line	9,000	600		07/27/19			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		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		1	1
2019	08/16/19	08/16/19	1	Donegan Road	untreated wastewater	manhole	overflow	18,000	18,000		8/17/19	Seminole Bypass Canal		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		08/16/2019	Seminole Bypass Canal		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		1	1
2019	08/16/19	08/18/19	3	Hillsdale Ave & Gladys St	raw sewage	manhole	high rain event	125,140	125,140		08/16/19	Mckay Creek		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		1	1
2019	08/16/19	08/18/19	3	5000 150th Avenue North	partially treated	WRF	high rain event	187,050	unknown	unknown	08/16/19				
2019	08/17/19	8/17/19	1	Donegan Road & Lake Avenue	untreated wastewater	manhole	high rain event	15,000	15,000		08/17/19			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		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		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		1	1
2019	09/03/19	09/03/19	1	13391 Vonn Road & 134th Avenue	reclaimed water	WWRF reclaimed	broken valve	240,000			09/03/19			0	0
2019	10/19/19	10/19/19	1	5100 150th Avenue North	partially treated wastewater	bypass valve	overflow	100			10/19/19			0	0
2019	10/24/19	10/24/19	1	Central Park Apartments, 301 Seacrest Drive, & Barnsdale Drive	raw sewage	manhole	grease	120		50	10/24/19			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		1	1
2019	11/19/19	11/19/19	1	401 Rosary Rd NE	untreated wastewater	manhole	grease	200	200	200	11/19/19			1	1
2019	11/29/19	11/29/19	1	2175 62nd Street N & Roosevelt	untreated wastewater	manhole	overflow	85			11/29/19			0	0
2019	12/06/19	12/06/19	1	1177 Missouri Avenue & Rosery Road	raw sewage	manhole	grease	225			12/06/19			0	1

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			289				TOTALS	50,206,877	48,729,204	949,617				139	52
2019	12/19/19	12/19/19	1	17964 US 19, Clearwater & Belleair Rd	wastewater	force main	line break/cave in	500			12/19/19			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			01/02/20			0	0
2020	01/15/20	01/15/20	1	13845 US 19 & 142nd Ave N	wastewater	force main	line break/cave in	100			01/15/20			0	0
2020	01/16/20	01/16/20	1	788 N. Missouri Ave & Rosery Road	wastewater	force main	damage by contractor	40			01/26/20			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			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		1	1
2020	02/06/20	02/06/20	1	2200 Gladys Street - Autumn Chase & 134th Avenue N	untreated wastewater	manhole	grease	550	550		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		02/06/20	Tampa Bay		1	0
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		02/08/20	Seminole Bypass Canal		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			0	0
2020	02/26/20	02/26/20	1	13030 Starkey Road & 130th Ave N	wastewater	grease trap manhole	grease	150			2/26/20			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			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			3/12/20			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			0	0
2020	04/05/20	04/06/20	2	2554 Oak Trail South	untreated wastewater	manhole	blockage	8,250	0	0	04/06/20		nearby storm drain	0	1