

August 20, 2014

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

Mr. Tim Savage, Superintendent  
Washington County Board of Education  
229 Granade Street  
Chatom, Alabama 36518

Re: **Notice of Violation and Intent to File Suit under the Clean Water Act for Violations of NPDES Permit No. AL0042391 and Consent Order 13-104-CWP**

Dear Mr. Savage:

Pursuant to the Clean Water Act § 505, 33 U.S.C. § 1365, and 40 C.F.R. Part 135, Subpart A, you are hereby notified that after the expiration of sixty (60) days following the date of this notice, the Environmental Defense Alliance may file suit against the Washington County Board of Education for discharges of pollutants from the Leroy High School WWTP at 26301 Highway 43 in Leroy, Alabama into an unnamed tributary to Gaines Creek at approximately Latitude 31.50075° N, Longitude 87.97277° W in violation of the Clean Water Act, 33 U.S.C. § 1251 et seq., NPDES Permit No. AL0042391, and Consent Order 13-104-CWP.

**I. Violations of NPDES Permit No. AL0042391**

Pursuant to § 402 of the Clean Water Act, 33 U.S.C. § 1342, the Alabama Department of Environmental Management issued NPDES Permit No. AL0042391 authorizing the Board to discharge pollutants from the Leroy High School WWTP into an unnamed tributary of Gaines Creek subject to specific discharge limitations. The Board has discharged pollutants from Outfall 0011 into the unnamed tributary of Gaines Creek in violation of the discharge limitations of NPDES Permit No. AL0042391 from August 20, 2009 to June 30, 2014 as described in Tables 1 through 10. Additional violations have likely occurred subsequent to June 30, 2014, but have not been reported to the Alabama Department of Environmental Management yet.

**II. Violations of Consent Order 13-104-CWP**

On June 7, 2013, the Alabama Department of Environmental Management issued Consent Order 13-104-CWP to the Board. Among other things, the Order required that the Board comply with the discharge limitations for Carbonaceous Biochemical Oxygen Demand (CBOD), Total Residual Chlorine (TRC), Percent Removal of Total Suspended Solids (TSS), Ammonia (as Nitrogen (NH<sub>3</sub>-N), pH, Dissolved Oxygen (DO), and Total Suspended Solids (TSS) in NPDES Permit No. AL0042391 by September 18, 2013. The Board has discharged pollutants from Outfall 0011 into the unnamed tributary of Gaines Creek in violation of Consent

Order 13-104-CWP from September 18, 2013 to June 30, 2014 as described in Tables 11 through 17. Additional violations have likely occurred subsequent to June 30, 2014, but have not been reported to the Alabama Department of Environmental Management yet.

### **III. History of Enforcement Actions**

On October 16, 2003, the Alabama Department of Environmental Management issued a Notice of Violation to the Board. The Notice alleged violations of discharge limitations in NPDES Permit No. AL0042391 for Ammonia (as Nitrogen) (NH<sub>3</sub>-N) during the months of April, June and August 2003.

On February 17, 2005, the Alabama Department of Environmental Management issued a Notice of Violation to the Board. The Notice alleged violations of discharge limitations in NPDES Permit No. AL0042391 for Ammonia (as Nitrogen) (NH<sub>3</sub>-N), pH, Carbonaceous Biochemical Oxygen Demand (CBOD), and Total Suspended Solids (TSS) during the months of August, September and November 2004.

On June 20, 2012, the Alabama Department of Environmental Management issued Consent Order 12-131-CWP to the Board. Among other things, the Order alleged violations of discharge limitations in NPDES Permit No. AL0042391 for Carbonaceous Biochemical Oxygen Demand (CBOD), Total Residual Chlorine (TRC), Percent Removal of Total Suspended Solids (TSS), Ammonia (as Nitrogen (NH<sub>3</sub>-N), pH, Dissolved Oxygen (DO), Total Suspended Solids (TSS) and Fecal Coliform (FC) during the months of April and June through December, 2010; February, April, and June through December 2011; and February 2012. The Order required the Board to submit an engineering report that addresses the need for changes in maintenance and operating procedures, the need for modification of existing treatment works, the need for new or additional treatment works, and the corrective actions to resolve the deficiencies noted by a recent Department inspection. The Engineering Report was required to include a schedule for implementation (i.e., a Compliance Plan) by June 20, 2013. The Order required that the Board comply with the Permit limitations for CBOD, TRC, Percent Removal of TSS, NH<sub>3</sub>-N, pH, DO, TSS, and FC by June 20, 2013. The Order assessed no penalties for past violations. The Order required the payment of stipulated penalties for future violations of \$100 (1st through 30th day), \$200 (31st through 60th day) and \$300 (after 60th day), not to exceed an aggregate of \$18,000.

On June 7, 2013, the Alabama Department of Environmental Management issued Consent Order 13-104-CWP to the Board. Among other things, the Order alleged violations of discharge limitations in NPDES Permit No. AL0042391 for Carbonaceous Biochemical Oxygen Demand (CBOD), Total Residual Chlorine (TRC), Percent Removal of Total Suspended Solids (TSS), Ammonia (as Nitrogen (NH<sub>3</sub>-N), pH, Dissolved Oxygen (DO), Total Suspended Solids (TSS) and Fecal Coliform (FC) during the months of April and June through December, 2010; February, April, and June through December 2011; and February 2012. The Order required the Board to complete implementation of the recommendations provided in the Engineering Report submitted on September 18, 2012 not later than September 18, 2013. The Order required that the

Board comply with the discharge limitations for Carbonaceous Biochemical Oxygen Demand (CBOD), Total Residual Chlorine (TRC), Percent Removal of Total Suspended Solids (TSS), Ammonia (as Nitrogen (NH<sub>3</sub>-N), pH, Dissolved Oxygen (DO), Total Suspended Solids (TSS), and Fecal Coliform (FC) in NPDES Permit No. AL0042391 by September 18, 2013. The Order assessed no penalties for past violations. The Order required the payment of stipulated penalties for future violations of \$100 (1st through 30th day), \$200 (31st through 60th day) and \$300 (after 60th day), not to exceed an aggregate of \$18,000.

These enforcement actions have not resulted in the Board's compliance with the discharge limitations in NPDES Permit No. AL0042391 and violations continue.

#### **IV. Sanctions**

The Court may assess civil penalties of up to \$37,500 per violation. Each day a violation continues is a separate violation. Violations of monthly average limits and weekly average limits are counted as violations for each day of the month and each day of the week, respectively. *See Atlantic States Legal Found., Inc. v. Tyson Foods, Inc.*, 897 F.2d 1128 (11th Cir. 1990). Accordingly, there are 3,983 discharge violations of NPDES Permit No. AL0042391 and 497 discharge violations of Consent Order 13-104-CWP alleged herein. In addition, the Court may award litigation expenses and attorney fees. Suit may be avoided if these violations have been permanently abated before the expiration of sixty (60) days following the date of this notice. Please advise the undersigned of any measures that you may undertake which you contend have permanently abated these violations before suit is filed.

Sincerely,



David A. Ludder  
Attorney for Environmental Defense Alliance

cc: Hon. Gina McCarthy, Administrator  
Environmental Protection Agency  
Mail Code 1101A  
1200 Pennsylvania Avenue, N.W.  
Washington, DC 20460

Hon. Heather McTeer Toney, Regional Administrator  
Environmental Protection Agency-Region 4  
Atlanta Federal Center  
61 Forsyth Street, SW  
Atlanta, GA 30303-3104

Hon. Lance LeFleur, Director  
Alabama Department of Environmental Management  
P.O. Box 301463  
Montgomery, AL 36130-1463

Environmental Defense Alliance  
103 Hermosa Drive  
Birmingham, AL 35209-2076  
(850) 386-5671

TABLE 1

PERCENT REMOVAL OF TOTAL SUSPENDED SOLIDS IN EFFLUENT DISCHARGED FROM OUTFALL 0011			
Monitoring Period End Date	MONTHLY AVERAGE		
	Permit Limit (percent removal)	Measured Value (percent removal)	Violation Days
Jun 30, 2014	≥85.0	46	30
Apr 30, 2014	≥85.0	76	30
Jul 31, 2013	≥85.0	17	31
Jun 30, 2013	≥85.0	0	30
May 31, 2013	≥85.0	61	31
Apr 30, 2013	≥85.0	70	30
Dec 31, 2012	≥85.0	78	31
Oct 31, 2012	≥85.0	51	31
Aug 31, 2012	≥85.0	67	31
Jul 31, 2012	≥85.0	0	31
May 31, 2012	≥85.0	83	31
Apr 30, 2012	≥85.0	77	30
Mar 31, 2012	≥85.0	72.2	31
Feb 29, 2012	≥85.0	77	29
Jan 31, 2012	≥85.0	79.5	31
Nov 30, 2011	≥85.0	77	30
Oct 31, 2011	≥85.0	79	31
Aug 31, 2011	≥85.0	60	31
Jul 31, 2011	≥85.0	35	31
Jun 30, 2011	≥85.0	0.88	31
May 31, 2011	≥85.0	80	31
Apr 30, 2011	≥85.0	72	30
Mar 31, 2011	≥85.0	79.6	31
Dec 31, 2010	≥85.0	53	31
Nov 30, 2010	≥85.0	82	30
Jul 31, 2010	≥85.0	69	31
Jun 30, 2010	≥85.0	59	30
Dec 31, 2009	≥85.0	80	31
Sep 30, 2009	≥85.0	34	30
Aug 31, 2009	≥85.0	80	31
TOTAL VIOLATION DAYS			918

TABLE 2

TOTAL SUSPENDED SOLIDS IN EFFLUENT DISCHARGED FROM OUTFALL 0011							
Monitoring Period End Date	MONTHLY AVERAGE			WEEKLY AVERAGE			
	Permit Limit (lbs/day)	Measured Value (lbs/day)	Violation Days	Permit Limit (lbs/day)	Measured Value (lbs/day)	Violation Days	
Nov 30, 2012	≤6.3	9.8	30	≤9.4	15	7	
Sep 30, 2012	≤6.3	14	30	≤9.4	22	7	
Aug 31, 2012	≤6.3	22	31	≤9.4	59	7	
Jul 31, 2012	≤6.3	90	31	≤9.4	301	7	
Jun 30, 2012	≤6.3	21	30	≤9.4	30	7	
May 31, 2012	≤6.3	48	31	≤9.4	73	7	
Apr 30, 2012	≤6.3	32	30	≤9.4	40	7	
Dec 31, 2011	≤6.3	18	31	≤9.4	25	7	
Sep 30, 2009	≤6.3	6.5	30				
TOTAL VIOLATION DAYS			274	TOTAL VIOLATION DAYS			56

TABLE 3

TOTAL SUSPENDED SOLIDS IN EFFLUENT DISCHARGED FROM OUTFALL 0011						
Monitoring Period End Date	MONTHLY AVERAGE			WEEKLY AVERAGE		
	Permit Limit (mg/L)	Measured Value (mg/L)	Violation Days	Permit Limit (mg/L)	Measured Value (mg/L)	Violation Days
May 31, 2013	≤30.0	69	31	≤45.0	64	7
Aug 31, 2012				≤45.0	53	7
Dec 31, 2010				≤45.0	54	7
Apr 30, 2010				≤45.0	48	7
Sep 30, 2009	≤30.0	52	30	≤45.0	70	7
TOTAL VIOLATION DAYS			61	TOTAL VIOLATION DAYS 35		

TABLE 4

BIOCHEMICAL OXYGEN DEMAND IN EFFLUENT DISCHARGED FROM OUTFALL 0011							
Monitoring Period End Date	MONTHLY AVERAGE			WEEKLY AVERAGE			
	Permit Limit (lbs/day)	Measured Value (lbs/day)	Violation Days	Permit Limit (lbs/day)	Measured Value (lbs/day)	Violation Days	
Feb 28, 2014				≤4.69	4.9	7	
May 31, 2013				≤3.12	5.7	7	
Nov 30, 2012	≤3.1	30	30	≤4.7	52	7	
Sep 30, 2012	≤2.1	4.6	30	≤3.1	5.7	7	
Aug 31, 2012	≤2.1	3.0	31	≤3.1	4.4	7	
Jul 31, 2012	≤2.1	12	31	≤3.1	26	7	
Jun 30, 2012	≤2.1	38	30	≤3.1	108	7	
May 31, 2012	≤2.1	53	31	≤3.1	106	7	
Apr 30, 2012	≤3.1	6.8	30	≤4.7	8.8	7	
Dec 31, 2011	≤3.1	19	31	≤4.7	42	7	
Aug 31, 2011				≤3.1	9.3	7	
Sep 30, 2010				≤3.1	5.1	7	
Oct 31, 2009				≤3.1	4.8	7	
TOTAL VIOLATION DAYS			244	TOTAL VIOLATION DAYS			91

TABLE 5

BIOCHEMICAL OXYGEN DEMAND IN EFFLUENT DISCHARGED FROM OUTFALL 0011							
Monitoring Period End Date	MONTHLY AVERAGE			WEEKLY AVERAGE			
	Permit Limit (mg/L)	Measured Value (mg/L)	Violation Days	Permit Limit (mg/L)	Measured Value (mg/L)	Violation Days	
Feb 28, 2014				≤22.5	49	7	
Oct 31, 2013				≤15.0	26	7	
Jul 31, 2013				≤15.0	24	7	
Jun 30, 2013	≤10.0	13	30	≤15.0	18	7	
May 31, 2013	≤10.0	61	31	≤15.0	170	7	
Oct 31, 2012				≤15.0	19	7	
Jun 30, 2012	≤10.0	12	30	≤15.0	33	7	
May 31, 2012	≤10.0	16	31	≤15.0	32	7	
Jan 31, 2012	≤15.0	15.2	31	≤22.5	59	7	
Dec 31, 2011				≤22.5	26	7	
Oct 31, 2011	≤10.0	16	31	≤15.0	28	7	
Aug 31, 2011	≤10.0	16	31	≤15.0	70	7	
Jun 30, 2011	≤15.0	24	30	≤15.0	27	7	
Apr 30, 2011	≤15.0			≤22.5	33	7	
Oct 31, 2010				≤15.0	24	7	
Sep 30, 2010	≤10.0	12	30	≤15.0	29	7	
May 31, 2010				≤15.0	19	7	
Nov 30, 2009				≤22.5	28	7	
Oct 31, 2009				≤15.0	41	7	
TOTAL VIOLATION DAYS			275	TOTAL VIOLATION DAYS			133



TABLE 6

RESIDUAL CHLORINE IN EFFLUENT DISCHARGED FROM OUTFALL 0011							
Monitoring Period End Date	MONTHLY AVERAGE			DAILY MAXIMUM			
	Permit Limit (mg/L)	Measured Value (mg/L)	Violation Days	Permit Limit (mg/L)	Measured Value (mg/L)	Violation Days	
Jun 30, 2014	≤0.011	0.10	30	≤0.019	0.10	1	
May 31, 2014	≤0.011	0.10	31	≤0.019	0.10	1	
Apr 30, 2014	≤0.011	0.10	30	≤0.019	0.10	1	
Mar 31, 2014	≤0.011	0.10	31	≤0.019	0.10	1	
Feb 28, 2014	≤0.011	0.10	28	≤0.019	0.11	1	
Jan 31, 2014	≤0.011	0.10	31	≤0.019	0.10	1	
Dec 31, 2013	≤0.011	0.10	31	≤0.019	0.10	1	
Nov 30, 2013	≤0.011	0.11	30	≤0.019	0.14	1	
Oct 31, 2013	≤0.011	0.10	31	≤0.019	0.10	1	
Sep 30, 2013	≤0.011	0.1	30	≤0.019	0.1	1	
Aug 31, 2013	≤0.011	0.10	31	≤0.019	0.10	1	
Jul 31, 2013	≤0.011	0.10	30	≤0.019	0.10	1	
Jun 30, 2013	≤0.011	0.12	31	≤0.019	0.13	1	
May 31, 2013	≤0.011	0.14	30	≤0.019	0.24	1	
Apr 30, 2013	≤0.011	0.74	31	≤0.019	2.2	1	
Mar 31, 2013	≤0.011	0.1	31	≤0.019	0.1	1	
Jan 31, 2013	≤0.011	0.104	31	≤0.019	0.1	1	
Dec 31, 2012	≤0.011	0.27	31	≤0.019	0.68	1	
Nov 30, 2012				≤0.019	2.2	1	
Oct 31, 2012				≤0.019	1.95	1	
Sep 30, 2012				≤0.019	2.2	1	
Aug 31, 2012				≤0.019	0.10	1	
Jul 31, 2012				≤0.019	0.74	1	
Jun 30, 2012				≤0.019	0.10	1	
May 31, 2012				≤0.019	1.80	1	
Apr 30, 2012				≤0.019	1.28	1	
Mar 31, 2012				≤0.019	0.30	1	
Feb 29, 2012				≤0.019	0.10	1	
Jan 31, 2012				≤0.019	0.52	1	
Dec 31, 2011				≤0.019	0.1	1	
Nov 30, 2011				≤0.019	0.10	1	
Oct 31, 2011				≤0.019	0.19	1	
Sep 30, 2011				≤0.019	1.28	1	
Aug 31, 2011				≤0.019	0.35	1	
Jul 31, 2011				≤0.019	0.10	1	
Jun 30, 2011				≤0.019	0.1	1	
May 31, 2011				≤0.019	0.12	1	
Apr 30, 2011				≤0.019	0.17	1	
Mar 31, 2011				≤0.019	1.13	1	
Feb 28, 2011				≤0.019	0.33	1	
Jan 31, 2011				≤0.019	1.1	1	
Dec 31, 2010				≤0.019	2.20	1	
Nov 30, 2010				≤0.019	0.1	1	
Oct 31, 2010				≤0.019	0.51	1	
Sep 30, 2010				≤0.019	0.36	1	
Aug 31, 2010				≤0.019	0.49	1	
Jul 31, 2010				≤0.019	0.26	1	
Jun 30, 2010				≤0.019	0.36	1	
May 31, 2010				≤0.019	0.4	1	
Apr 30, 2010				≤0.019	1.16	1	
Mar 31, 2010				≤0.019	1.18	1	
Feb 28, 2010				≤0.019	0.51	1	
Jan 31, 2010				≤0.019	2.20	1	
Dec 31, 2009				≤0.019	0.83	1	
Nov 30, 2009				≤0.019	0.11	1	
Oct 31, 2009				≤0.019	0.18	1	
Sep 30, 2009				≤0.019	0.28	1	
TOTAL VIOLATION DAYS			549	TOTAL VIOLATION DAYS			57

TABLE 7

DISCHARGE OF AMMONIA (AS N) FROM OUTFALL 0011						
MONITORING PERIOD END DATE	MONTHLY AVERAGE			WEEKLY AVERAGE		
	Limit (lbs/day)	Measured Value (lbs/day)	Violation Days	Limit (lbs/day)	Measured Value (lbs/day)	Violation Days
Sep 30, 2013				≤0.688	0.92	7
Mar 31, 2013				≤1.31	1.4	7
Nov 30, 2012	≤0.870	1.2	30	≤1.3	2.1	7
Oct 31, 2012				≤1	1.27	7
Sep 30, 2012	≤0.450	1.8	30	≤1	3.9	7
Jul 31, 2012	≤0.450	4.4	31	≤1	17	7
May 31, 2012	≤0.450	23	31	≤1	63	7
Apr 30, 2012	≤0.870	5	30	≤1.3	14	7
Feb 29, 2012	≤0.870	1.02	29	≤1.3	2.21	7
Dec 31, 2011				≤1.3	2.940	7
Oct 31, 2011				≤1	1.1	7
Sep 30, 2011	≤0.450	0.55	30			
Aug 31, 2011	≤0.450	1.5	31	≤1	5.7	7
May 31, 2011	≤0.450	0.71	31	≤1	2.5	7
Oct 31, 2010				≤1	1.38	7
Sep 30, 2010	≤0.450	1.0	31	≤1	4.2	7
Jan 31, 2010				≤1.3	2	7
Dec 31, 2009				≤1.3	1.6	7
TOTAL VIOLATION DAYS			304	TOTAL VIOLATION DAYS 119		

TABLE 8

DISCHARGE OF AMMONIA (AS N) FROM OUTFALL 0011							
MONITORING PERIOD END DATE	MONTHLY AVERAGE			WEEKLY AVERAGE			
	Limit (mg/L)	Measured Value (mg/L)	Violation Days	Limit (mg/L)	Measured Value (mg/L)	Violation Days	
May 31, 2014				≤3.30	4.4	7	
Apr 30, 2014	≤4.20	4.5	30	≤6.30	13	7	
Mar 31, 2014	≤4.20	6.8	31	≤6.30	12	7	
Jan 31, 2014				≤6.30	9.2	7	
Oct 31, 2013	≤2.20	2.7	31	≤3.30	5.8	7	
Sep 30, 2013	≤2.20	3.0	30	≤3.30	7.6	7	
May 31, 2013	≤2.20	6.4	31	≤3.30	12	7	
Apr 30, 2013	≤4.20	11	30	≤6.30	16	7	
Mar 31, 2013	≤4.20	12	31	≤6.30	27	7	
Oct 31, 2012	≤2.2	6.6	31	≤3.3	19	7	
May 31, 2012	≤2.2	4.2	31	≤3.3	19	7	
Apr 30, 2012				≤6.3	8.0	7	
Mar 31, 2012	≤4.2	7.1	30	≤6.3	10	7	
Feb 29, 2012	≤4.2	4.5	29	≤6.3	9.8	7	
Nov 30, 2011				≤6.3	7.7	7	
Oct 31, 2011	≤2.2	4.6	31	≤3.3	16	7	
Sep 30, 2011	≤2.2	4.7	30	≤3.3	11	7	
Aug 31, 2011	≤2.2	11	31	≤3.3	43	7	
May 31, 2011	≤2.2	6.1	31	≤3.3	21	7	
Apr 30, 2011				≤6.3	8.0	7	
Mar 31, 2011				≤6.3	9.5	7	
Nov 30, 2010				≤6.3	7.6	7	
Oct 31, 2010				≤3.3	11	7	
Sep 30, 2010	≤2.2	6.0	30	≤3.3	24	7	
Aug 31, 2010	≤2.2	2.4	31	≤3.3	8.3	7	
May 31, 2010	≤2.2	2.6	31	≤3.3	8.2	7	
Feb 28, 2010	≤4.2	5.4	28	≤6.3	7.3	7	
Jan 31, 2010	≤4.2	6.2	28	≤6.3	16	7	
Dec 31, 2009				≤6.3	8.1	7	
Sep 30, 2009				≤3.3	6.5	7	
Aug 31, 2009				≤3.3	4.4	7	
TOTAL VIOLATION DAYS			606	TOTAL VIOLATION DAYS			217

TABLE 9

pH OF EFFLUENT DISCHARGED FROM OUTFALL 0011			
Monitoring Period End Date	DAILY MINIMUM		
	Permit Limit (s.u.)	Measured Value (s.u.)	Violation Days
Jun 30, 2014	≥6.0	4.1	1
Feb 28, 2014	≥6.0	5.6	1
Dec 31, 2013	≥6.0	5.3	1
Nov 30, 2013	≥6.0	5.0	1
Oct 31, 2013	≥6.0	4.3	1
Aug 31, 2013	≥6.0	3.5	1
Jul 31, 2013	≥6.0	3.5	1
Jun 30, 2013	≥6.0	5.5	1
May 31, 2013	≥6.0	4.3	1
Dec 31, 2012	≥6.0	4.72	1
Nov 30, 2012	≥6.0	4.41	1
Oct 31, 2012	≥6.0	3.55	1
Jul 31, 2012	≥6.0	5.28	1
Jun 30, 2012	≥6.0	4.31	1
May 31, 2012	≥6.0	4.9	1
Feb 29, 2012	≥6.0	4.2	1
Jan 31, 2012	≥6.0	4.18	1
Dec 31, 2011	≥6.0	4.0	1
Nov 30, 2011	≥6.0	3.6	1
Oct 31, 2011	≥6.0	3.4	1
Mar 31, 2010	≥6.0	5.9	1
Feb 28, 2010	≥6.0	5.6	1
Aug 31, 2009	≥6.0	5.5	1

TOTAL VIOLATION DAYS

23

TABLE 10

DISSOLVED OXYGEN OF EFFLUENT DISCHARGED FROM OUTFALL 0011			
Monitoring Period End Date	DAILY MINIMUM		
	Permit Limit (mg/L)	Measured Value (mg/L)	Violation Days
Dec 31, 2013	≥5.0	4.6	1
Oct 31, 2013	≥5.0	3.5	1
Sep 30, 2013	≥5.0	4.3	1
Aug 31, 2013	≥5.0	3.3	1
Jul 31, 2013	≥5.0	1.7	1
Jun 30, 2013	≥5.0	4.3	1
May 31, 2013	≥5.0	1.6	1
Dec 31, 2012	≥5.0	3.37	1
Nov 30, 2012	≥5.0	3.50	1
Oct 31, 2012	≥5.0	4.63	1
Sep 30, 2012	≥5.0	0.24	1
Aug 31, 2012	≥5.0	0.23	1
Jul 31, 2012	≥5.0	0.44	1
Jun 30, 2012	≥5.0	4.21	1
May 31, 2012	≥5.0	4.5	1
Dec 31, 2011	≥5.0	4.8	1
Nov 30, 2011	≥5.0	4.4	1
Oct 31, 2011	≥5.0	4.0	1
Aug 31, 2011	≥5.0	3.2	1
Jun 30, 2011	≥5.0	0.17	1
Feb 28, 2010	≥5.0	4.7	1

TOTAL VIOLATION DAYS

21

TABLE 11

PERCENT REMOVAL OF TOTAL SUSPENDED SOLIDS IN EFFLUENT DISCHARGED FROM			
Monitoring Period End Date	MONTHLY AVERAGE		
	Permit Limit (percent removal)	Measured Value (percent removal)	Violation Days
Jun 30, 2014	≥85.0	46	30
Apr 30, 2014	≥85.0	76	30
TOTAL VIOLATION DAYS			60

TABLE 12

BIOCHEMICAL OXYGEN DEMAND IN EFFLUENT DISCHARGED FROM OUTFALL 0011			
Monitoring Period End Date	WEEKLY AVERAGE		
	Permit Limit (lbs/day)	Measured Value (lbs/day)	Violation Days
Feb 28, 2014	≤4.69	4.9	7
TOTAL VIOLATION DAYS			7

TABLE 13

BIOCHEMICAL OXYGEN DEMAND IN EFFLUENT DISCHARGED FROM OUTFALL 0011			
Monitoring Period End Date	WEEKLY AVERAGE		
	Permit Limit (mg/L)	Measured Value (mg/L)	Violation Days
Feb 28, 2014	≤22.5	49	7
Oct 31, 2013	≤15.0	26	7
TOTAL VIOLATION DAYS			14

TABLE 14

pH OF EFFLUENT DISCHARGED FROM OUTFALL 0011			
Monitoring Period End Date	DAILY MINIMUM		
	Permit Limit (s.u.)	Measured Value (s.u.)	Violation Days
Jun 30, 2014	≥6.0	4.1	1
Feb 28, 2014	≥6.0	5.6	1
Dec 31, 2013	≥6.0	5.3	1
Nov 30, 2013	≥6.0	5.0	1
Oct 31, 2013	≥6.0	4.3	1
TOTAL VIOLATION DAYS			5

TABLE 15

DISSOLVED OXYGEN OF EFFLUENT DISCHARGED FROM OUTFALL 0011			
Monitoring Period End Date	DAILY MINIMUM		
	Permit Limit (mg/L)	Measured Value (mg/L)	Violation Days
Dec 31, 2013	≥5.0	4.6	1
Oct 31, 2013	≥5.0	3.5	1
TOTAL VIOLATION DAYS			2

TABLE 16

RESIDUAL CHLORINE IN EFFLUENT DISCHARGED FROM OUTFALL 0011						
Monitoring Period End Date	MONTHLY AVERAGE			DAILY MAXIMUM		
	Permit Limit (mg/L)	Measured Value (mg/L)	Violation Days	Permit Limit (mg/L)	Measured Value (mg/L)	Violation Days
Jun 30, 2014	≤0.011	0.10	30	≤0.019	0.10	1
May 31, 2014	≤0.011	0.10	31	≤0.019	0.10	1
<b>Apr 30, 2014</b>	≤0.011	0.10	30	≤0.019	0.10	1
Mar 31, 2014	≤0.011	0.10	31	≤0.019	0.10	1
Feb 28, 2014	≤0.011	0.10	28	≤0.019	0.11	1
Jan 31, 2014	≤0.011	0.10	31	≤0.019	0.10	1
Dec 31, 2013	≤0.011	0.10	31	≤0.019	0.10	1
Nov 30, 2013	≤0.011	0.11	30	≤0.019	0.14	1
Oct 31, 2013	≤0.011	0.10	31	≤0.019	0.10	1
TOTAL VIOLATION DAYS			273	TOTAL VIOLATION DAYS		

TABLE 17

DISCHARGE OF AMMONIA (AS N) FROM OUTFALL 0011							
MONITORING PERIOD END DATE	MONTHLY AVERAGE			WEEKLY AVERAGE			
	Limit (mg/L)	Measured Value (mg/L)	Violation Days	Limit (mg/L)	Measured Value (mg/L)	Violation Days	
May 31, 2014				≤3.30	4.4	7	
Apr 30, 2014	≤4.20	4.5	30	≤6.30	13	7	
Mar 31, 2014	≤4.20	6.8	31	≤6.30	12	7	
Jan 31, 2014				≤6.30	9.2	7	
Oct 31, 2013	≤2.20	2.7	31	≤3.30	5.8	7	
TOTAL VIOLATION DAYS			92	TOTAL VIOLATION DAYS			35



## AlaFile E-Notice

65-CV-2014-900077.00

To: ROBERT D. TAMBLING  
rtambling@ago.state.al.us

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# NOTICE OF ELECTRONIC FILING

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IN THE CIRCUIT COURT OF WASHINGTON COUNTY, ALABAMA

STATE OF ALABAMA EX REL, LUTHER STRANGE AG ET AL V. WASHINGTON COUNTY  
65-CV-2014-900077.00

The following complaint was FILED on 9/26/2014 9:11:18 AM

Notice Date: 9/26/2014 9:11:18 AM

VALERIE KNAPP  
CIRCUIT COURT CLERK  
WASHINGTON COUNTY, ALABAMA  
COURT STREET  
CHATOM, AL 36518

251-847-2239  
valerie.knapp@alacourt.gov



**COVER SHEET  
CIRCUIT COURT - CIVIL CASE**

(Not For Domestic Relations Cases)

Case Number:

**65-CV-201**

Date of Filing:

09/26/2014



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9/26/2014 9:11 AM  
65-CV-2014-900077.00  
CIRCUIT COURT OF  
WASHINGTON COUNTY, ALABAMA  
VALERIE KNAPP, CLERK

**GENERAL INFORMATION**

**IN THE CIRCUIT OF WASHINGTON COUNTY, ALABAMA**

**STATE OF ALABAMA EX REL, LUTHER STRANGE AG ET AL v. WASHINGTON COUNTY BOARD OF**

**First Plaintiff:** ☐ Business ☐ Individual  
☒ Government ☐ Other

**First Defendant:** ☐ Business ☐ Individual  
☒ Government ☐ Other

**NATURE OF SUIT:**

**TORTS: PERSONAL INJURY**

- ☐ WDEA - Wrongful Death  
☐ TONG - Negligence: General  
☐ TOMV - Negligence: Motor Vehicle  
☐ TOWA - Wantonnes  
☐ TOPL - Product Liability/AEMLD  
☐ TOMM - Malpractice-Medical  
☐ TOLM - Malpractice-Legal  
☐ TOOM - Malpractice-Other  
☐ TBFM - Fraud/Bad Faith/Misrepresentation  
☐ TOXX - Other: \_\_\_\_\_

**TORTS: PERSONAL INJURY**

- ☐ TOPE - Personal Property  
☐ TORE - Real Property

**OTHER CIVIL FILINGS**

- ☐ ABAN - Abandoned Automobile  
☐ ACCT - Account & Nonmortgage  
☐ APAA - Administrative Agency Appeal  
☐ ADPA - Administrative Procedure Act  
☐ ANPS - Adults in Need of Protective Services

**OTHER CIVIL FILINGS (cont'd)**

- ☐ MSXX - Birth/Death Certificate Modification/Bond Forfeiture  
Appeal/Enforcement of Agency Subpoena/Petition to  
Preserve  
☐ CVRT - Civil Rights  
☐ COND - Condemnation/Eminent Domain/Right-of-Way  
☐ CTMP-Contempt of Court  
☐ CONT-Contract/Ejectment/Writ of Seizure  
☐ TOCN - Conversion  
☐ EQND- Equity Non-Damages Actions/Declaratory  
Judgment/Injunction Election Contest/Quiet Title/Sale For  
Division  
☐ CVUD-Eviction Appeal/Unlawful Detainer  
☐ FORJ-Foreign Judgment  
☐ FORF-Fruits of Crime Forfeiture  
☐ MSHC-Habeas Corpus/Extraordinary Writ/Mandamus/Prohibition  
☐ PFAB-Protection From Abuse  
☐ FELA-Railroad/Seaman (FELA)  
☐ RPRO-Real Property  
☐ WTEG-Will/Trust/Estate/Guardianship/Conservatorship  
☐ COMP-Workers' Compensation  
☒ CVXX-Miscellaneous Circuit Civil Case

**ORIGIN:** F ☒ **INITIAL FILING**

A ☐ **APPEAL FROM  
DISTRICT COURT**

O ☐ **OTHER**

R ☐ **REMANDED**

T ☐ **TRANSFERRED FROM  
OTHER CIRCUIT COURT**

**HAS JURY TRIAL BEEN DEMANDED?** ☐ Yes ☒ No

**RELIEF REQUESTED:** ☒ **MONETARY AWARD REQUESTED** ☐ **NO MONETARY AWARD REQUESTED**

**ATTORNEY CODE:** TAM001

9/26/2014 9:11:57 AM

/s/ ROBERT D. TAMBLING

**MEDIATION REQUESTED:** ☐ Yes ☒ No ☐ Undecided



**THE CIRCUIT COURT OF  
WASHINGTON COUNTY, ALABAMA**

**STATE OF ALABAMA ex rel.,  
LUTHER STRANGE,  
ATTORNEY GENERAL  
and the ALABAMA DEPARTMENT of  
ENVIRONMENTAL MANAGEMENT,**

**Plaintiffs,**

**v.**

**WASHINGTON COUNTY BOARD  
OF EDUCATION,**

**Defendant.**

**Civil Action No.**

**CV-2014-\_\_\_\_\_**

**COMPLAINT**

**The Parties**

1. The Attorney General is authorized by Ala. Code § 22-22A-5(1), § 22-22-9(m), § 22-22A-5(12), and § 22-22A-5(18) (2006 Rplc. Vol.) to enforce the provisions of the Alabama Water Pollution Control Act (hereinafter “AWPCA”), which is found at Ala. Code §§ 22-22-1 through 22-22-14 (2006 Rplc. Vol.). Specifically, Ala. Code § 22-22A-5(18)b. (2006 Rplc. Vol.) authorizes the Attorney General to bring a civil action for violation of permits issued under the AWPCA and for unpermitted discharges of pollutants in violation of said Act. In addition, Ala. Code § 22-22A-5(18)c. (2006 Rplc. Vol.) authorizes the Attorney General to recover civil penalties for such permit violations and unpermitted discharges of pollutants, providing for a maximum of \$25,000.00 per violation. The Attorney General is authorized by Ala. Code § 36-15-12 (2006 Rplc. Vol.) to institute and prosecute, in the name of the State, all civil actions and other proceedings necessary to protect the rights and interests of the State.

2. The Alabama Department of Environmental Management (hereinafter “the

Department” or “ADEM”) is a duly constituted department of the State of Alabama pursuant to Ala. Code §§ 22-22A-1 through 22-22A-16 (2006 Rplc. Vol.). Pursuant to Ala. Code § 22-22A-4(n) (2006 Rplc. Vol.), the Department is the state agency responsible for the promulgation and enforcement of water pollution control regulations in accordance with the Federal Water Pollution Control Act, 33 U.S.C. §§ 1251 to 1387. In addition, the Department is authorized to administer and enforce the provisions of the AWPCA.

3. The Washington County Board of Education (hereinafter “the Permittee”) operates a wastewater treatment facility known as the Leroy High School wastewater treatment facility (hereinafter “WWTF”). The WWTF discharges pollutants from Leroy High School located at 26301 Highway 43, Leroy, Washington County, Alabama, into an unnamed tributary to Gaines Creek, a water of the State.

#### **Jurisdiction and Venue**

4. The Court has jurisdiction and venue over this Complaint pursuant to Ala. Code § 22-22A-5(18)b. and § 22-22A-5(19) (2006 Rplc. Vol.).

#### **General Allegations**

5. Pursuant to the National Pollutant Discharge Elimination System (hereinafter “NPDES”) program administered by ADEM and approved by the Administrator of the U.S. Environmental Protection Agency pursuant to § 402 of the Federal Water Pollution Control Act, 33 U.S.C. § 1342, the Department issued NPDES Permit Number AL0042391 (hereinafter “the Permit”) to the Permittee. Said Permit was reissued to the Permittee on November 28, 2007, effective December 1, 2007, establishing limitations, terms, and conditions on the discharge of pollutants from a point source designated as Outfall Number 0011 from the Leroy High School WWTF to an unnamed tributary to Bassetts Creek, a water of the State. The Department again

reissued the Permit on September 27, 2012, effective December 1, 2012. With the reissuance, the discharge receiving stream was updated from an unnamed tributary to Bassetts Creek to an unnamed tributary to Gaines Creek, a water of the State. The Permit requires that the Permittee monitor its discharges and submit periodic Discharge Monitoring Reports (hereinafter “DMRs”) to the Department describing the results of the monitoring. The Permit also requires that the Permittee maintain in good working order all systems used by the Permittee to achieve compliance with the terms and conditions of the Permit.

6. DMRs submitted to the Department by the Permittee indicate that the Permittee has discharged pollutants from the aforementioned point source, Outfall Number 0011, to an unnamed tributary to Gaines Creek in violation of the limitations established in the Permit. The months the violations occurred along with the parameters violated are listed in Attachment 1, which is incorporated by reference as if fully set forth herein.

7. Permit Condition I.C.2.b requires that a noncompliance notification report be submitted to the Department should a discharge not comply with any limitation of the permit. Noncompliance notification reports are to be submitted to the Department with the next DMR after becoming aware of the noncompliance. The Permittee failed to submit noncompliance notification reports as described in Attachment 1.

8. Permit Condition I.A requires that discharges be limited and monitored as specified in the Permit. The Permittee failed to submit the monitoring data for the parameters listed in Attachment 1.

9. Ala. Code §22-22-9(i)(3) (2006 Rplc. Vol.) requires that a permit be obtained prior to discharging any new or increased pollution into any water of the State. The Permittee reported to the Department one unpermitted discharge in the form of a Sanitary Sewer Overflows

(hereinafter “SSO”) between July 2009 and July 2014. The SSO is listed in Attachment 1.

10. The Department issued Consent Order 12-131-CWP to the Permittee on June 20, 2012 which required the Permittee to comply with the Permit limitations for DO, pH, TSS, NH<sub>3</sub>-N, TRC, Fecal Coliform (FC), CBOD<sub>5</sub>, and TSS percent removal no later than June 20, 2013.

11. The Department issued Consent Order 13-104-CWP to the Permittee on June 7, 2013. Consent Order 13-104-CWP modified the compliance dates given in Paragraphs F, H, J, and L of Consent Order 12-131-CWP due to the Permittee’s indication that additional time would be required to achieve compliance as a result of delayed procurement of equipment for upgrades to the WWTF. Consent Order 13-104-CWP required the Permittee to comply with the Permit limitations for DO, pH, TSS, NH<sub>3</sub>-N, TRC, FC, CBOD<sub>5</sub>, and TSS percent removal no later than September 18, 2013.

12. The DMRs submitted to the Department since the September 18, 2013 compliance date in Consent Order 13-104-CWP indicate the Permittee has not achieved compliance with DO, pH, NH<sub>3</sub>-N, TRC, CBOD<sub>5</sub>, and TSS percent removal.

#### **Count I**

13. Plaintiffs repeat, replead and incorporate by reference paragraphs 1 through 12, above.

14. The above violations are due to be abated by injunction.

#### **Count II**

15. Plaintiffs repeat, replead and incorporate by reference paragraphs 1 through 14, above.

16. Pursuant to Ala. Code § 22-22A-5(18) (2006 Rplc. Vol.), a civil penalty is due to be assessed for the referenced violations.

**PRAYER FOR RELIEF**

WHEREFORE, Plaintiffs respectfully request that the Court:

- A. Take jurisdiction over this matter.
- B. Adjudge and declare that the Permittee violated the limitations, terms, and conditions of the Permit.
- C. Adjudge and declare that the Permittee caused or allowed discharges of pollutants from its wastewater treatment facility into a water of the State in violation of the limitations set forth in the Permit.
- D. Order the Permittee to take action to ensure that similar violations of the AWPCA will not recur in the future.
- E. Assess a civil penalty against the Permittee and in favor of Plaintiffs pursuant to Ala. Code §§ 22-22A-5(18)b. and c. (2006 Rplc. Vol.) for each and every violation of the Permit alleged in this Complaint.
- F. Tax the costs of this action against the Defendant.
- G. Order such other relief that the Court deems proper.

Respectfully submitted,

s/ Robert D. Tambling\_\_\_\_\_  
Robert D. Tambling (TAM001)  
Assistant Attorney General

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s/ Schuyler Espy  
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Facility Name: Leroy High School  
Permit Number: AL0042391

#### Missing Data

<u>Monitoring Period</u>	<u>Outfall</u>	<u>Parameter</u>	<u>Unit</u>	<u>Average, Maximum, Minimum</u>
July 2009	0011	TSS	lbs/day	Monthly Average
July 2009	0011	TSS	lbs/day	Weekly Average
July 2009	0011	NH3-N	lbs/day	Monthly Average
July 2009	0011	NH3-N	lbs/day	Weekly Average
July 2009	0011	Flow	MGD	Monthly Average
July 2009	0011	Flow	MGD	Maximum Daily
July 2009	0011	CBOD5	lbs/day	Monthly Average
July 2009	0011	CBOD5	lbs/day	Weekly Average
September 2009	001Q	TKN	lbs/day	Monthly Average
September 2009	001Q	TKN	lbs/day	Weekly Average
September 2009	001Q	NO2+NO3-N	lbs/day	Monthly Average
September 2009	001Q	NO2+NO3-N	lbs/day	Weekly Average
September 2009	001Q	TP	lbs/day	Monthly Average
September 2009	001Q	TP	lbs/day	Weekly Average
March 2011	001Q	TKN	lbs/day	Monthly Average
March 2011	001Q	TKN	lbs/day	Weekly Average
March 2011	001Q	NO2+NO3-N	lbs/day	Monthly Average
March 2011	001Q	NO2+NO3-N	lbs/day	Weekly Average
March 2011	001Q	TP	lbs/day	Monthly Average
March 2011	001Q	TP	lbs/day	Weekly Average
March 2011	0011	TSS	lbs/day	Monthly Average
March 2011	0011	TSS	lbs/day	Weekly Average
March 2011	0011	NH3-N	lbs/day	Monthly Average
March 2011	0011	NH3-N	lbs/day	Weekly Average
March 2011	0011	Flow	MGD	Monthly Average
March 2011	0011	Flow	MGD	Maximum Daily
March 2011	0011	CBOD5	lbs/day	Monthly Average
March 2011	0011	CBOD5	lbs/day	Weekly Average
September 2011	001Q	TKN	lbs/day	Monthly Average
September 2011	001Q	TKN	lbs/day	Weekly Average
September 2011	001Q	NO2+NO3-N	lbs/day	Monthly Average
September 2011	001Q	NO2+NO3-N	lbs/day	Weekly Average
September 2011	001Q	TP	lbs/day	Monthly Average
September 2011	001Q	TP	lbs/day	Weekly Average
January 2012	0011	TSS	lbs/day	Monthly Average
January 2012	0011	TSS	lbs/day	Weekly Average
January 2012	0011	Flow	MGD	Monthly Average
January 2012	0011	Flow	MGD	Maximum Daily
January 2012	0011	CBOD5	lbs/day	Monthly Average
January 2012	0011	CBOD5	lbs/day	Weekly Average
January 2012	0011	NH3-N	lbs/day	Monthly Average
January 2012	0011	NH3-N	lbs/day	Weekly Average
March 2012	0011	TSS	lbs/day	Monthly Average
March 2012	0011	TSS	lbs/day	Weekly Average
March 2012	0011	Flow	MGD	Monthly Average
March 2012	0011	Flow	MGD	Maximum Daily
March 2012	0011	CBOD5	lbs/day	Monthly Average
March 2012	0011	CBOD5	lbs/day	Weekly Average
March 2012	0011	NH3-N	lbs/day	Monthly Average
March 2012	0011	NH3-N	lbs/day	Weekly Average
December 2012	0011	E.coli	col/100mL	Monthly Average
December 2012	0011	E.coli	col/100mL	Maximum Daily



TSS = Total Suspended Solids

NH3-N = Total Ammonia as Nitrogen

CBOD5 = Five Day Carbonaceous Biochemical Oxygen Demand

TKN = Total Kjeldahl as Nitrogen

NO2+NO3-N = Total Nitrite plus Nitrate

TP = Total Phosphorous

E.coli = Escherichia coli

#### Limitation Violations

<u>Monitoring Period</u>	<u>Outfall</u>	<u>Parameter</u>	<u>Average, Max, Min</u>	<u>Unit</u>	<u>Limit</u>	<u>Reported Value</u>	<u>Noncompliance Notification Report Received</u>
July 2009	0011	TRC	Daily Maximum	mg/L	0.019	0.44	No
July 2009	0011	FC	Monthly Average	col/100mL	200	700	No
July 2009	0011	TSS % Removal	Monthly Avg Min	%	85.0	65	No
August 2009	0011	pH	Daily Minimum	s.u.	6.0	5.5	No
August 2009	0011	NH3-N	Weekly Average	mg/L	3.3	4.4	No
August 2009	0011	FC	Max Monthly Geo Mean	col/100mL	200	1631	No
August 2009	0011	FC	Daily Maximum	col/100mL	2000	6000	No
August 2009	0011	TSS % Removal	Monthly Avg Min	%	85.0	80	No
September 2009	0011	TSS	Monthly Average	lbs/day	6.3	6.5	No
September 2009	0011	TSS	Monthly Average	mg/L	30	52	No
September 2009	0011	TSS	Weekly Average	mg/L	45	70	No
September 2009	0011	NH3-N	Weekly Average	mg/L	3.3	6.5	No
September 2009	0011	TRC	Daily Maximum	mg/L	0.019	0.28	No
September 2009	0011	FC	Max Monthly Geo Mean	col/100mL	200	37000	No
September 2009	0011	FC	Daily Maximum	col/100mL	2000	60000	No
September 2009	0011	TSS % Removal	Monthly Avg Min	%	85.0	34	No
October 2009	0011	CBOD5	Weekly Average	lbs/day	3.1	4.8	No
October 2009	0011	CBOD5	Monthly Average	mg/L	10.0	12	No
October 2009	0011	CBOD5	Weekly Average	mg/L	15.0	41	No
October 2009	0011	FC	Max Monthly Geo Mean	col/100mL	1000	3000	No
October 2009	0011	FC	Daily Maximum	col/100mL	2000	6000	No
October 2009	0011	TRC	Daily Maximum	mg/L	0.019	0.18	No
November 2009	0011	pH	Daily Minimum	s.u.	6.0	5.4	No
November 2009	0011	CBOD5	Weekly Average	mg/L	22.5	28	No
November 2009	0011	FC	Max Monthly Geo Mean	col/100mL	1000	5000	No
November 2009	0011	FC	Daily Maximum	col/100mL	2000	20000	No
November 2009	0011	TRC	Daily Maximum	mg/L	0.019	0.11	No
December 2009	0011	TSS % Removal	Monthly Avg Min	%	85.0	80	No
December 2009	0011	FC	Monthly Average	col/100mL	1000	3400	No
December 2009	0011	FC	Daily Maximum	col/100mL	2000	6000	No
December 2009	0011	TRC	Daily Maximum	mg/L	0.019	0.83	No
December 2009	0011	NH3-N	Weekly Average	lbs/day	1.3	1.6	No
December 2009	0011	NH3-N	Weekly Average	mg/L	6.3	8.1	No
January 2010	0011	FC	Max Monthly Geo Mean	col/100mL	1000	1543	No
January 2010	0011	FC	Daily Maximum	col/100mL	2000	6000	No
January 2010	0011	TRC	Daily Maximum	mg/L	0.019	2.2	No
January 2010	0011	NH3-N	Weekly Average	lbs/day	1.3	2.0	No
January 2010	0011	NH3-N	Monthly Average	mg/L	4.2	6.2	No
January 2010	0011	NH3-N	Weekly Average	mg/L	6.3	16	No
February 2010	0011	TSS % Removal	Monthly Avg Min	%	85.0	83	No
February 2010	0011	pH	Daily Minimum	s.u.	6.0	5.6	No
February 2010	0011	FC	Monthly Average	col/100mL	1000	3000	No

February 2010	0011	FC	Daily Maximum	col/100mL	2000	6000	No
February 2010	0011	TRC	Daily Maximum	mg/L	0.019	0.51	No
February 2010	0011	DO	Daily Minimum	mg/L	5.0	4.7	No
February 2010	0011	NH3-N	Monthly Average	mg/L	4.2	5.4	No
February 2010	0011	NH3-N	Weekly Average	mg/L	6.3	7.3	No
March 2010	0011	pH	Daily Minimum	s.u.	6.0	5.9	No
March 2010	0011	FC	Max Monthly Geo Mean	col/100mL	1000	1384	No
March 2010	0011	FC	Daily Maximum	col/100mL	2000	6000	No
March 2010	0011	TRC	Daily Maximum	mg/L	0.019	1.18	No
April 2010	0011	TSS	Weekly Average	mg/L	45.0	48	Yes
April 2010	0011	TRC	Daily Maximum	mg/L	0.019	1.16	Yes
May 2010	0011	NH3-N	Monthly Average	mg/L	2.2	2.6	No
May 2010	0011	NH3-N	Weekly Average	mg/L	3.3	8.2	No
May 2010	0011	TRC	Daily Maximum	mg/L	0.019	0.4	No
May 2010	0011	FC	Max Monthly Geo Mean	col/100mL	1000	1603	No
May 2010	0011	FC	Daily Maximum	col/100mL	2000	6400	No
May 2010	0011	CBOD5	Weekly Average	mg/L	15.0	19	No
June 2010	0011	pH	Maximum Daily	s.u.	8.5	11.2	No
June 2010	0011	TSS % Removal	Monthly Avg Min	%	85.0	59	Yes
June 2010	0011	FC	Max Monthly Geo Mean	col/100mL	200	2163	Yes
June 2010	0011	FC	Daily Maximum	col/100mL	2000	6000	Yes
June 2010	0011	TRC	Daily Maximum	mg/L	0.019	0.36	Yes
July 2010	0011	TSS % Removal	Monthly Avg Min	%	85.0	69	Yes
July 2010	0011	TRC	Daily Maximum	mg/L	0.019	0.26	Yes
August 2010	0011	TRC	Daily Maximum	mg/L	0.019	0.49	Yes
August 2010	0011	NH3-N	Monthly Average	mg/L	2.2	2.4	Yes
August 2010	0011	NH3-N	Weekly Average	mg/L	3.3	8.3	Yes
September 2010	0011	CBOD5	Weekly Average	lbs/day	3.1	5.1	Yes
September 2010	0011	CBOD5	Monthly Average	mg/L	10.0	12	Yes
September 2010	0011	CBOD5	Weekly Average	mg/L	15.0	29	Yes
September 2010	0011	FC	Max Monthly Geo Mean	col/100mL	200	4925	Yes
September 2010	0011	FC	Daily Maximum	col/100mL	2000	6000	Yes
September 2010	0011	TRC	Daily Maximum	mg/L	0.019	0.36	Yes
September 2010	0011	NH3-N	Monthly Average	lbs/day	0.450	1.1	Yes
September 2010	0011	NH3-N	Weekly Average	lbs/day	1	4.2	Yes
September 2010	0011	NH3-N	Monthly Average	mg/L	2.2	6.0	Yes
September 2010	0011	NH3-N	Weekly Average	mg/L	3.3	24	Yes
October 2010	0011	NH3-N	Weekly Average	lbs/day	1	1.38	Yes
October 2010	0011	NH3-N	Monthly Average	mg/L	2.2	3.4	Yes
October 2010	0011	NH3-N	Weekly Average	mg/L	3.3	11	Yes
October 2010	0011	TRC	Daily Maximum	mg/L	0.019	0.51	Yes
October 2010	0011	CBOD5	Weekly Average	mg/L	15.0	24	Yes
November 2010	0011	NH3-N	Weekly Average	mg/L	6.3	7.6	Yes
November 2010	0011	TRC	Daily Maximum	mg/L	0.019	0.10	Yes
November 2010	0011	FC	Max Monthly Geo Mean	col/100mL	1000	27500	Yes
November 2010	0011	FC	Daily Maximum	col/100mL	2000	100000	Yes
November 2010	0011	TSS % Removal	Monthly Avg Min	%	85.0	82	Yes
December 2010	0011	TSS	Weekly Average	mg/L	45	54	Yes
December 2010	0011	TRC	Daily Maximum	mg/L	0.019	2.2	Yes
December 2010	0011	FC	Max Monthly Geo Mean	col/100mL	1000	35500	Yes
December 2010	0011	FC	Daily Maximum	col/100mL	2000	82000	Yes
December 2010	0011	TSS % Removal	Monthly Avg Min	%	85.0	53	Yes
January 2011	0011	TRC	Daily Maximum	mg/L	0.019	1.12	No

January 2011	0011	FC	Max Monthly Geo Mean	col/100mL	1000	4800	No
January 2011	0011	FC	Daily Maximum	col/100mL	2000	9000	No
February 2011	0011	TRC	Daily Maximum	mg/L	0.019	0.33	Yes
February 2011	0011	FC	Max Monthly Geo Mean	col/100mL	1000	2730	Yes
February 2011	0011	FC	Daily Maximum	col/100mL	2000	7200	Yes
March 2011	0011	NH3-N	Weekly Average	mg/L	6.3	9.5	No
March 2011	0011	TRC	Daily Maximum	mg/L	0.019	1.13	No
March 2011	0011	FC	Max Monthly Geo Mean	col/100mL	1000	3450	No
March 2011	0011	FC	Daily Maximum	col/100mL	2000	12000	No
March 2011	0011	CBOD5	Weekly Average	mg/L	22.5	33	No
March 2011	0011	TSS % Removal	Monthly Avg Min	%	85.0	79.6	No
April 2011	0011	NH3-N	Weekly Average	mg/L	6.3	8.0	No
April 2011	0011	TRC	Daily Maximum	mg/L	0.019	0.17	Yes
April 2011	0011	FC	Max Monthly Geo Mean	col/100mL	1000	4345	Yes
April 2011	0011	FC	Daily Maximum	col/100mL	2000	11000	Yes
April 2011	0011	TSS % Removal	Monthly Avg Min	%	85.0	72	Yes
May 2011	0011	NH3-N	Monthly Average	lbs/day	0.450	0.71	No
May 2011	0011	NH3-N	Weekly Average	lbs/day	1	2.5	No
May 2011	0011	NH3-N	Monthly Average	mg/L	2.2	6.1	No
May 2011	0011	NH3-N	Weekly Average	mg/L	3.3	21	No
May 2011	0011	TRC	Daily Maximum	mg/L	0.019	0.12	No
May 2011	0011	FC	Max Monthly Geo Mean	col/100mL	1000	9822	No
May 2011	0011	FC	Daily Maximum	col/100mL	2000	30000	No
May 2011	0011	TSS % Removal	Monthly Avg Min	%	85.0	80	No
June 2011	0011	DO	Daily Minimum	mg/L	5.0	0.17	Yes
June 2011	0011	TRC	Daily Maximum	mg/L	0.019	0.1	Yes
June 2011	0011	FC	Max Monthly Geo Mean	col/100mL	200	4900	Yes
June 2011	0011	FC	Daily Maximum	col/100mL	2000	190000	Yes
June 2011	0011	CBOD5	Weekly Average	lbs/day	3.1	4.2	Yes
June 2011	0011	CBOD5	Monthly Average	mg/L	10.0	24	Yes
June 2011	0011	CBOD5	Weekly Average	mg/L	15.0	27	Yes
June 2011	0011	TSS % Removal	Monthly Avg Min	%	85.0	0.88	No
July 2011	0011	TRC	Daily Maximum	mg/L	0.019	0.10	Yes
July 2011	0011	FC	Max Monthly Geo Mean	col/100mL	200	6400	Yes
July 2011	0011	FC	Daily Maximum	col/100mL	2000	20000	Yes
July 2011	0011	TSS % Removal	Monthly Avg Min	%	85.0	35	Yes
August 2011	0011	DO	Daily Minimum	mg/L	5.0	3.2	Yes
August 2011	0011	NH3-N	Monthly Average	lbs/day	0.450	1.5	Yes
August 2011	0011	NH3-N	Weekly Average	lbs/day	1	5.7	Yes
August 2011	0011	NH3-N	Monthly Average	mg/L	2.2	11	Yes
August 2011	0011	NH3-N	Weekly Average	mg/L	3.3	43	Yes
August 2011	0011	TRC	Daily Maximum	mg/L	0.019	0.35	Yes
August 2011	0011	FC	Max Monthly Geo Mean	col/100mL	200	2900	Yes
August 2011	0011	FC	Daily Maximum	col/100mL	2000	6000	Yes
August 2011	0011	CBOD5	Weekly Average	lbs/day	3.1	9.3	Yes
August 2011	0011	CBOD5	Monthly Average	mg/L	10.0	16	Yes
August 2011	0011	CBOD5	Weekly Average	mg/L	15.0	70	Yes
August 2011	0011	TSS % Removal	Monthly Avg Min	%	85.0	60	Yes
September 2011	0011	NH3-N	Monthly Average	lbs/day	0.450	0.55	Yes
September 2011	0011	NH3-N	Monthly Average	mg/L	2.2	4.7	Yes
September 2011	0011	NH3-N	Weekly Average	mg/L	3.3	11	Yes

September 2011	0011	TRC	Daily Maximum	mg/L	0.019	1.28	Yes
September 2011	0011	FC	Max Monthly Geo Mean	col/100mL	200	2200	Yes
September 2011	0011	FC	Daily Maximum	col/100mL	2000	6000	Yes
October 2011	0011	DO	Daily Minimum	mg/L	5.0	4.0	Yes
October 2011	0011	pH	Daily Minimum	s.u.	6.0	3.4	Yes
October 2011	0011	NH3-N	Weekly Average	lbs/day	1	1.1	Yes
October 2011	0011	NH3-N	Monthly Average	mg/L	2.2	4.6	Yes
October 2011	0011	NH3-N	Weekly Average	mg/L	3.3	16	Yes
October 2011	0011	TRC	Daily Maximum	mg/L	0.019	0.19	Yes
October 2011	0011	FC	Max Monthly Geo Mean	col/100mL	1000	7000	Yes
October 2011	0011	FC	Daily Maximum	col/100mL	2000	22000	Yes
October 2011	0011	CBOD5	Monthly Average	mg/L	10.0	16	Yes
October 2011	0011	CBOD5	Weekly Average	mg/L	15.0	28	Yes
October 2011	0011	TSS % Removal	Monthly Avg Min	%	85.0	79	Yes
November 2011	0011	DO	Daily Minimum	mg/L	5.0	4.4	
November 2011	0011	pH	Daily Minimum	s.u.	6.0	3.6	Yes
November 2011	0011	NH3-N	Weekly Average	mg/L	6.3	7.7	Yes
November 2011	0011	TRC	Daily Maximum	mg/L	0.019	0.10	Yes
November 2011	0011	FC	Max Monthly Geo Mean	col/100mL	1000	10300	Yes
November 2011	0011	FC	Daily Maximum	col/100mL	2000	31000	Yes
November 2011	0011	TSS % Removal	Monthly Avg Min	%	85.0	77	Yes
December 2011	0011	DO	Daily Minimum	mg/L	5.0	4.8	Yes
December 2011	0011	pH	Daily Minimum	s.u.	6.0	4.0	Yes
December 2011	0011	TSS	Monthly Average	lbs/day	6.3	18	Yes
December 2011	0011	TSS	Weekly Average	lbs/day	9.4	25	Yes
December 2011	0011	NH3-N	Weekly Average	lbs/day	1.3	2.940	Yes
December 2011	0011	TRC	Daily Maximum	mg/L	0.019	0.1	Yes
December 2011	0011	CBOD5	Monthly Average	lbs/day	3.1	19	Yes
December 2011	0011	CBOD5	Weekly Average	lbs/day	4.7	42	Yes
December 2011	0011	CBOD5	Weekly Average	mg/L	22.5	26	Yes
December 2011	0011	TSS % Removal	Monthly Avg Min	%	85.0	81	Yes
January 2012	0011	pH	Daily Minimum	s.u.	6.0	4.18	No
January 2012	0011	TRC	Daily Maximum	mg/L	0.019	0.52	No
January 2012	0011	CBOD5	Weekly Average	mg/L	22.5	59	No
January 2012	0011	CBOD5	Monthly Average	mg/L	15.0	15.2	No
January 2012	0011	TSS % Removal	Monthly Avg Min	%	85.0	79.5	No
February 2012	0011	pH	Daily Minimum	s.u.	6.0	4.2	No
February 2012	0011	NH3-N	Monthly Average	lbs/day	0.870	1.02	No
February 2012	0011	NH3-N	Weekly Average	lbs/day	1.3	2.21	No
February 2012	0011	NH3-N	Monthly Average	mg/L	4.2	4.5	No
February 2012	0011	NH3-N	Weekly Average	mg/L	6.3	9.8	No
February 2012	0011	TRC	Daily Maximum	mg/L	0.019	0.10	No
February 2012	0011	TSS % Removal	Monthly Avg Min	%	85.0	77	No
March 2012	0011	NH3-N	Monthly Average	mg/L	4.2	7.1	No
March 2012	0011	NH3-N	Weekly Average	mg/L	6.3	10	No
March 2012	0011	TRC	Daily Maximum	mg/L	0.019	0.3	No
March 2012	0011	FC	Max Monthly Geo Mean	col/100mL	1000	6875	No
March 2012	0011	FC	Daily Maximum	col/100mL	2000	13000	No
March 2012	0011	TSS % Removal	Monthly Avg Min	%	85.0	72.2	No
April 2012	0011	TSS	Monthly Average	lbs/day	6.3	32	No
April 2012	0011	TSS	Weekly Average	lbs/day	9.4	40	No
April 2012	0011	NH3-N	Weekly Average	lbs/day	1.3	14	No
April 2012	0011	NH3-N	Weekly Average	mg/L	6.3	8.0	No
April 2012	0011	NH3-N	Monthly Average	lbs/day	0.870	5.0	No

April 2012	0011	TRC	Daily Maximum	mg/L	0.019	1.28	No
April 2012	0011	FC	Max Monthly Geo Mean	col/100mL	1000	2400	No
April 2012	0011	FC	Daily Maximum	col/100mL	2000	8700	No
April 2012	0011	CBOD5	Monthly Average	lbs/day	3.1	6.8	No
April 2012	0011	CBOD5	Weekly Average	lbs/day	4.7	8.8	No
April 2012	0011	TSS % Removal	Monthly Avg Min	%	85.0	77	No
May 2012	0011	DO	Daily Minimum	mg/L	5.0	4.5	No
May 2012	0011	pH	Daily Minimum	s.u.	6.0	4.9	No
May 2012	0011	TSS	Monthly Average	lbs/day	6.3	48	No
May 2012	0011	TSS	Weekly Average	lbs/day	9.4	73	No
May 2012	0011	NH3-N	Monthly Average	lbs/day	0.450	23	No
May 2012	0011	NH3-N	Weekly Average	lbs/day	1	63	No
May 2012	0011	NH3-N	Monthly Average	mg/L	2.2	4.2	No
May 2012	0011	NH3-N	Weekly Average	mg/L	3.3	19	No
May 2012	0011	TRC	Daily Maximum	mg/L	0.019	1.80	No
May 2012	0011	CBOD5	Monthly Average	lbs/day	2.1	53	No
May 2012	0011	CBOD5	Weekly Average	lbs/day	3.1	106	No
May 2012	0011	CBOD5	Monthly Average	mg/L	10.0	16	No
May 2012	0011	CBOD5	Weekly Average	mg/L	15.0	32	No
May 2012	0011	TSS % Removal	Monthly Avg Min	%	85.0	83	No
June 2012	0011	DO	Daily Minimum	mg/L	5.0	4.21	No
June 2012	0011	pH	Daily Minimum	s.u.	6.0	4.31	No
June 2012	0011	TSS	Monthly Average	lbs/day	6.3	21	No
June 2012	0011	TSS	Weekly Average	lbs/day	9.4	30	No
June 2012	0011	TRC	Daily Maximum	mg/L	0.019	0.10	No
June 2012	0011	FC	Max Monthly Geo Mean	col/100mL	200	3254	No
June 2012	0011	FC	Daily Maximum	col/100mL	2000	13000	No
June 2012	0011	CBOD5	Monthly Average	lbs/day	2.1	38	No
June 2012	0011	CBOD5	Weekly Average	lbs/day	3.1	108	No
June 2012	0011	CBOD5	Monthly Average	mg/L	10.0	12	No
June 2012	0011	CBOD5	Weekly Average	mg/L	15.0	33	No
July 2012	0011	DO	Daily Minimum	mg/L	5.0	0.44	Yes
July 2012	0011	pH	Daily Minimum	s.u.	6.0	5.28	Yes
July 2012	0011	TSS	Monthly Average	lbs/day	6.3	90	Yes
July 2012	0011	TSS	Weekly Average	lbs/day	9.4	301	No
July 2012	0011	NH3-N	Monthly Average	lbs/day	0.450	4.4	Yes
July 2012	0011	NH3-N	Weekly Average	lbs/day	1	17	No
July 2012	0011	TRC	Daily Maximum	mg/L	0.019	0.74	Yes
July 2012	0011	FC	Max Monthly Geo Mean	col/100mL	200	1892	Yes
July 2012	0011	FC	Daily Maximum	col/100mL	2000	7000	Yes
July 2012	0011	CBOD5	Monthly Average	lbs/day	2.1	12	Yes
July 2012	0011	CBOD5	Weekly Average	lbs/day	3.1	26	Yes
July 2012	0011	TSS % Removal	Monthly Avg Min	%	85.0	0	No
August 2012	0011	DO	Daily Minimum	mg/L	5.0	0.23	Yes
August 2012	0011	TSS	Weekly Average	mg/L	45	53	No
August 2012	0011	TSS	Monthly Average	lbs/day	6.3	22	Yes
August 2012	0011	TSS	Weekly Average	lbs/day	9.4	59	Yes
August 2012	0011	TRC	Daily Maximum	mg/L	0.019	0.10	Yes
August 2012	0011	FC	Max Monthly Geo Mean	col/100mL	200	4003	Yes
August 2012	0011	FC	Daily Maximum	col/100mL	2000	11000	Yes
August 2012	0011	CBOD5	Monthly Average	lbs/day	2.1	3.0	Yes
August 2012	0011	CBOD5	Weekly Average	lbs/day	3.1	4.4	Yes
August 2012	0011	TSS % Removal	Monthly Avg Min	%	85.0	67	Yes
September 2012	0011	DO	Daily Minimum	mg/L	5.0	0.24	Yes

September 2012	0011	TSS	Monthly Average	lbs/day	6.3	14	Yes
September 2012	0011	TSS	Weekly Average	lbs/day	9.4	22	Yes
September 2012	0011	NH3-N	Monthly Average	lbs/day	0.450	1.8	Yes
September 2012	0011	NH3-N	Weekly Average	lbs/day	1	3.9	Yes
September 2012	0011	TRC	Daily Maximum	mg/L	0.019	2.2	Yes
September 2012	0011	FC	Max Monthly Geo Mean	col/100mL	200	4505.3	Yes
September 2012	0011	FC	Daily Maximum	col/100mL	2000	6000	Yes
September 2012	0011	CBOD5	Monthly Average	lbs/day	2.1	4.6	Yes
September 2012	0011	CBOD5	Weekly Average	lbs/day	3.1	5.7	Yes
October 2012	0011	DO	Daily Minimum	mg/L	5.0	4.63	Yes
October 2012	0011	pH	Daily Minimum	s.u.	6.0	3.55	Yes
October 2012	0011	NH3-N	Weekly Average	lbs/day	1	1.27	No
October 2012	0011	NH3-N	Monthly Average	mg/L	2.2	6.6	No
October 2012	0011	NH3-N	Weekly Average	mg/L	3.3	19	No
October 2012	0011	TRC	Daily Maximum	mg/L	0.019	1.95	Yes
October 2012	0011	CBOD5	Weekly Average	mg/L	15.0	19	Yes
October 2012	0011	TSS % Removal	Monthly Avg Min	%	85.0	51	Yes
November 2012	0011	DO	Daily Minimum	mg/l	5.0	3.50	Yes
November 2012	0011	pH	Daily Minimum	s.u.	6.0	4.41	Yes
November 2012	0011	TSS	Monthly Average	lbs/day	6.3	9.8	No
November 2012	0011	TSS	Weekly Average	lbs/day	9.4	15	No
November 2012	0011	NH3-N	Monthly Average	lbs/day	0.870	1.2	No
November 2012	0011	NH3-N	Weekly Average	lbs/day	1.3	2.1	No
November 2012	0011	TRC	Daily Maximum	mg/l	0.019	2.2	Yes
November 2012	0011	FC	Daily Maximum	col/100ml	2000	5900	No
November 2012	0011	CBOD5	Monthly Average	lbs/day	3.1	30	No
November 2012	0011	CBOD5	Weekly Average	lbs/day	4.7	52	No
December 2012	0011	DO	Daily Minimum	mg/L	5.0	3.37	Yes
December 2012	0011	pH	Daily Minimum	s.u.	6.0	4.72	Yes
December 2012	0011	TRC	Daily Maximum	mg/L	0.019	0.68	Yes
December 2012	0011	TRC	Monthly Average	mg/L	0.011	0.27	Yes
December 2012	0011	TSS % Removal	Monthly Avg Min	%	85	78	Yes
January 2013	0011	TRC	Daily Maximum	mg/L	0.019	0.1	Yes
January 2013	0011	TRC	Monthly Average	mg/L	0.011	0.104	Yes
February 2013	0011	TRC	Daily Maximum	mg/L	0.019	0.17	Yes
February 2013	0011	TRC	Monthly Average	mg/L	0.011	0.12	Yes
February 2013	0011	TSS % Removal	Monthly Avg Min	%	85.0	77.0	Yes
March 2013	0011	NH3-N	Weekly Average	lbs/day	1.31	1.4	Yes
March 2013	0011	NH3-N	Monthly Average	mg/L	4.20	12	Yes
March 2013	0011	NH3-N	Weekly Average	mg/L	6.30	27	Yes
March 2013	0011	TRC	Daily Maximum	mg/L	0.019	0.1	Yes
March 2013	0011	TRC	Monthly Average	mg/L	0.011	0.1	Yes
April 2013	0011	NH3-N	Monthly Average	mg/L	4.20	11.0	Yes
April 2013	0011	NH3-N	Weekly Average	mg/L	6.30	16.0	Yes
April 2013	0011	TRC	Daily Maximum	mg/L	0.019	2.2	Yes
April 2013	0011	TRC	Monthly Average	mg/L	0.011	0.74	Yes
April 2013	0011	TSS % Removal	Monthly Avg Min	%	85.0	70.0	Yes
May 2013	0011	DO	Daily Minimum	mg/L	5	1.6	No
May 2013	0011	pH	Daily Minimum	s.u.	6.0	4.3	No
May 2013	0011	TSS	Weekly Average	mg/L	45.0	64	Yes
May 2013	0011	TSS	Monthly average	mg/L	30.0	69	Yes
May 2013	0011	NH3-N	Monthly Average	mg/L	2.20	6.4	Yes
May 2013	0011	NH3-N	Weekly Average	mg/L	3.30	12	Yes
May 2013	0011	TRC	Monthly Average	mg/L	0.011	0.14	Yes
May 2013	0011	TRC	Daily Maximum	mg/L	0.019	0.24	Yes
May 2013	0011	CBOD5	Weekly Average	lbs/day	3.12	5.7	Yes
May 2013	0011	CBOD5	Weekly Average	mg/L	15.0	170	Yes

May 2013	0011	CBOD5	Monthly Average	mg/L	10.0	61	Yes
May 2013	0011	TSS % Removal	Monthly Avg Min	%	85.0	61	Yes
June 2013	0011	DO	Daily Minimum	mg/L	5	4.3	No
June 2013	0011	pH	Daily Minimum	s.u.	6.0	5.5	Yes
June 2013	0011	TRC	Monthly Average	mg/L	0.011	0.12	Yes
June 2013	0011	TRC	Daily Maximum	mg/L	0.019	0.13	Yes
June 2013	0011	CBOD5	Weekly Average	mg/L	15.0	18	Yes
June 2013	0011	CBOD5	Monthly Average	mg/L	10.0	13	Yes
June 2013	0011	TSS % Removal	Monthly Avg Min	%	85.0	0	Yes
July 2013	0011	DO	Daily Minimum	mg/L	5	1.7	Yes
July 2013	0011	pH	Daily Minimum	s.u.	6.0	3.5	Yes
July 2013	0011	TRC	Monthly Average	mg/L	0.011	0.10	Yes
July 2013	0011	TRC	Daily Maximum	mg/L	0.019	0.10	Yes
July 2013	0011	CBOD5	Weekly Average	mg/L	15.0	24	Yes
July 2013	0011	TSS % Removal	Monthly Avg Min	%	85.0	17	Yes
August 2013	0011	DO	Daily Minimum	mg/L	5	3.3	Yes
August 2013	0011	pH	Daily Minimum	s.u.	6.0	3.5	Yes
August 2013	0011	TRC	Monthly Average	mg/L	0.011	0.10	Yes
August 2013	0011	TRC	Daily Maximum	mg/L	0.019	0.10	Yes
September 2013	0011	DO	Daily Minimum	mg/L	5	4.3	Yes
September 2013	0011	NH3-N	Weekly Average	lbs/day	0.688	0.92	Yes
September 2013	0011	NH3-N	Monthly Average	mg/L	2.20	3.0	Yes
September 2013	0011	NH3-N	Weekly Average	mg/L	3.30	7.6	Yes
September 2013	0011	TRC	Monthly Average	mg/L	0.011	0.1	No
September 2013	0011	TRC	Daily Maximum	mg/L	0.019	0.1	No
October 2013	0011	DO	Daily Minimum	mg/L	5.0	3.5	Yes
October 2013	0011	pH	Daily Minimum	s.u.	6	4.3	Yes
October 2013	0011	NH3-N	Monthly Average	mg/L	2.20	2.7	Yes
October 2013	0011	NH3-N	Weekly Average	mg/L	3.30	5.8	Yes
October 2013	0011	TRC	Monthly Average	mg/L	0.011	0.1	No
October 2013	0011	TRC	Daily Maximum	mg/L	0.019	0.1	No
October 2013	0011	CBOD5	Weekly Average	mg/L	15.0	26	Yes
November 2013	0011	pH	Daily Minimum	s.u.	6.0	5.0	Yes
November 2013	0011	TRC	Monthly Average	mg/L	0.011	0.11	Yes
November 2013	0011	TRC	Daily Maximum	mg/L	0.019	0.14	Yes
December 2013	0011	DO	Daily Minimum	mg/L	5.0	4.6	Yes
December 2013	0011	pH	Daily Minimum	s.u.	6.0	5.3	Yes
December 2013	0011	TRC	Monthly Average	mg/L	0.011	0.1	No
December 2013	0011	TRC	Daily Maximum	mg/L	0.019	0.1	No
January 2014	0011	NH3-N	Weekly Average	mg/L	6.30	9.2	Yes
January 2014	0011	TRC	Monthly Average	mg/L	0.011	0.10	No
January 2014	0011	TRC	Daily Maximum	mg/L	0.019	0.10	No
February 2014	0011	pH	Daily Minimum	s.u.	6.0	5.6	Yes
February 2014	0011	TRC	Monthly Average	mg/L	0.011	0.10	Yes
February 2014	0011	TRC	Daily Maximum	mg/L	0.019	0.10	No
February 2014	0011	CBOD5	Weekly Average	lbs/day	4.69	4.9	No
February 2014	0011	CBOD5	Monthly Average	mg/L	22.5	49	Yes
March 2014	0011	NH3-N	Monthly Average	mg/L	4.20	6.8	Yes
March 2014	0011	NH3-N	Weekly Average	mg/L	6.30	12	Yes
March 2014	0011	TRC	Monthly Average	mg/L	0.011	0.10	No
March 2014	0011	TRC	Daily Maximum	mg/L	0.019	0.10	No
April 2014	0011	NH3-N	Monthly Average	mg/L	4.20	4.5	Yes
April 2014	0011	NH3-N	Weekly Average	mg/L	6.30	13	Yes
April 2014	0011	TRC	Monthly Average	mg/L	0.011	0.10	No
April 2014	0011	TRC	Daily Maximum	mg/L	0.019	0.10	No
April 2014	0011	TSS % Removal	Monthly Avg Min	%	85.0	76	No
May 2014	0011	NH3-N	Weekly Average	mg/L	3.30	4.4	Yes
May 2014	0011	TRC	Daily Maximum	mg/L	0.019	0.10	Yes

May 2014	0011	TRC	Monthly Average	mg/L	0.011	0.10	Yes
June 2014	0011	pH	Daily Minimum	s.u.	6.0	4.1	Yes
June 2014	0011	TRC	Daily Maximum	mg/L	0.019	0.10	Yes
June 2014	0011	TRC	Monthly Average	mg/L	0.011	0.10	Yes
June 2014	0011	TSS % Removal	Monthly Avg Min	%	85.0	46	Yes

TRC = Total Residual Chlorine

FC = Fecal Coliform

DO = Dissolved Oxygen

#### **Sanitary Sewer Overflows (SSOs)**

<b><u>Date</u></b>	<b><u>Location</u></b>	<b><u>Amount</u></b>
February 12, 2014	Leroy High School	500 gal