

OHIO E.P.A.

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ENTERED DIRECTOR'S JOURNAL

**BEFORE THE
OHIO ENVIRONMENTAL PROTECTION AGENCY**

In the matter of:

Village of Gnadenhutzen
P.O. Box 129
Gnadenhutzen, Ohio 44629-0129

Directors Final Findings
and Orders

Respondent

PREAMBLE

Pursuant to Ohio Revised Code (ORC) Sections 6111.03 and 3745.01, the Director of the Ohio Environmental Protection Agency (Ohio EPA) hereby makes the following Findings and issues the following Orders:

PARTIES BOUND

These Orders shall apply to and be binding upon the Village of Gnadenhutzen hereinafter Respondent, its assigns and successors in interest liable under Ohio law. No change in ownership or operation relating to the Respondent's WWTP, as hereinafter defined, shall in any way alter Respondent's obligations under these Orders. Respondent's obligations under these Orders may be altered only by the written action of the Director of the Ohio EPA.

FINDINGS

1. Respondent is the Village of Gnadenhutzen located in Tuscarawas County. Respondent owns and operates a wastewater treatment plant (WWTP) and associated sewer system. The WWTP was originally constructed in 1959 and was last modified in 1978. The system was designed for twenty years of operation.
2. Respondent holds an expired National Pollutant Discharge Elimination System (NPDES) permit, number OPB00017*FD (effective August 1, 1998), for the

*I certify this to be a true and accurate copy of the
official document as filed in the records of the Ohio
Environmental Protection Agency.*

By: [Signature] Date: 2/5/04

discharge from its WWTP to the Tuscarawas River. Ohio Administrative Code Rule 3745-33-04(C)(1) requires the Director to notify the permittee who wishes to continue discharging after the expiration date of its Ohio NPDES permit that the permittee must file for reissuance of the permit at least one hundred eighty days prior to its expiration. Ohio EPA sent Respondent a letter dated September 30, 2002 indicating that the permit would expire on July 28, 2003. On September 11, 2003, Ohio EPA received application Form 2A and the Antidegradation Addendum. On October 31, 2003 Ohio EPA received application Forms 1 and 2S. As of October 31st, the application was deemed complete and is under review by Ohio EPA.

3. The Tuscarawas River constitutes "waters of the state" as defined by ORC Section 6111.01.
4. Pursuant to ORC Section 6111.04(C), no person to whom a permit has been issued shall place or discharge, or cause to be placed or discharged, in any waters of the state any sewage, sludge, sludge materials, industrial waste, or other wastes in excess of the permissive discharges specified under an existing permit.
5. Pursuant to ORC Section 6111.07(A), no person shall violate or fail to perform any duty imposed by ORC Sections 6111.01 to 6111.08 or violate any order, rule, or term or condition of a permit issued or adopted by the Director of Ohio EPA pursuant to those sections. Each day of violation is a separate offense.
6. Respondent violated the final effluent limits and monitoring requirements of its NPDES permit on numerous occasions as cited in Attachment I. Each violation cited in Attachment I constitutes a separate violation of ORC Sections 6111.04 and 6111.07. Attachment I is hereby incorporated into these Findings & Orders as if fully stated herein.
7. Since Spring of 2000, Respondent's compliance with the NPDES permit limits for its wastewater treatment plant has improved, but, at times, the facility is still exceeding its permit limits.
8. Ohio EPA has conducted numerous inspections of the WWTP from September 1996 to present. Prior to Spring, 2000, these inspections revealed that the daily operation and maintenance was not being performed and the WWTP was frequently unattended.
9. Inspections commonly revealed: (1) dirty bar screens; (2) septic conditions in the grit channels, comminutor bypass, primary clarifiers and at the base of the screw pumps; and (3) solids floating on the surface of the final clarifiers and flowing over the weirs into the chlorine contact tanks.

10. In a May 19, 1999 letter, Respondent informed Ohio EPA that it was going to rebuild the primary clarifiers. To date these treatment units have not been rebuilt, and are not currently operational.
11. Respondent failed to submit Monthly Operating Reports (MORs) required by NPDES Permit number OPB00017*FD from December 1998 through May 1999. Ohio EPA received all of the late MORs from Respondent on July 6, 1999.
12. Ohio EPA conducted a Comprehensive Performance Evaluation (CPE) of Respondent's WWTP during the week of February 28, 2000. This evaluation revealed the following:
 - (a) The treatment system had been operating in a mode which generated a significant growth of filamentous bacteria. This condition inhibited the settling rate of the biomass in the secondary clarifiers which led to incidences of excessive loss of suspended solids from the system. The filamentous bacteria condition occurs because of a low food to microorganism ratio (F/M) within the aeration basin. To eliminate this condition, one of the two aeration tanks was taken out of service to provide a higher F/M ratio and to develop a faster settling biomass.
 - (b) The anaerobic digester and surrounding equipment were corroded. It was believed that the corrosion was due to the gases generated from the anaerobic digestion process.
 - (c) The off gases from the digestion process were suspected of causing septic odors emanating from the plant that resulted in complaints to Ohio EPA and the Tuscarawas County Health Department by the residents of surrounding homes. As a result, the anaerobic digester was taken out of service in order to eliminate safety concerns due to the condition of the unit and to eliminate odors.
 - (d) A raw influent was black and yellow in color, oily, and contained a tan/silty material. The industrial impacts were determined to be floor wax stripper which was being used at a local school. Because of these upsets, the school has discontinued sending this wastestream to the WWTP. It was believed that low pHs in the final effluent resulted from the industrial impacts to the WWTP.
13. The Comprehensive Performance Evaluation recommended that staffing levels at the WWTP be evaluated because it was expected that demands at the WWTP would increase due to pretreatment issues, laboratory analysis, construction projects and inspections, and mechanical failures due to equipment

age/condition at the plant. At the time, there were two full time employees who were in charge of the water and wastewater systems.

14. Pursuant to Part II.A of Respondent's NPDES permit, Respondent's WWTP is to be under the supervision of a Class III state certified operator as required by OAC Rule 3745-7-02. Under this rule, this operator is to be a full-time employee. Currently, Respondent does not have a full time Class III certified operator but has placed responsibility for such services with an appropriately certified technical supervisor. Based on Respondent's current WWTP design and treatment process and the current provisions for plant classifications, it is likely that this plant will be re-designated as a Class II wastewater works during the next NPDES permit renewal cycle. This classification may change based on future rule revisions.
15. On August 14, 2000, W.E . Quicksall and Associates submitted a general plan for needed upgrades to the Village's wastewater treatment plant. The general plan noted that there had been a lack of significant operation and maintenance work performed over a period of years that had resulted in the deterioration of process equipment, metalwork, electrical items, exposed piping and valves. On August 5, 2003, W.E. Quicksall and Associates submitted a revised General Plan that incorporates the proposed Membrane Bio-Reactor (MBR) technology that Respondent intends to install.
16. Part II.K of NPDES Permit OPB00017*FD requires Respondent to submit an annual sludge report by January 31st of the following year. Respondent submitted the sludge reports in violation of Part II.K of NPDES Permit OPB00017*FD for the following years:
 - 1999 report was received 2/12/03
 - 2000 report was received 1/27/03
 - 2001 report was received 12/30/02
 - 2002 report was received 2/12/03
17. The Ohio EPA has sent Respondent multiple Notice of Violations (NOVs) in an effort to address the compliance issues at the WWTP. While Respondent has improved its compliance with its NPDES permit limits, has prepared plans for the necessary improvements to the WWTP, and has been working to secure funding for their construction, to date, Respondent has not implemented these improvements.
18. This document does not modify NPDES Permit No. 0PB00017*FD. The purpose of these Findings and Orders is to correct a condition of noncompliance.

19. The following Orders do not constitute authorization or approval of the construction of any physical structure or facilities, or the modification of any existing treatment works or sewer system. Any such construction or modification is subject to the PTI requirements of OAC Chapter 3745-42.
20. Compliance with the ORC Chapter 6111 is not contingent upon the availability or receipt of financial assistance.
21. The Director has given consideration to, and based his determination on, evidence relating to the technical feasibility and economic reasonableness of complying with these Orders and to evidence relating to conditions calculated to result from compliance with these Orders, and its relation to the benefits to the people of the State to be derived from such compliance in accomplishing the purposes of ORC Chapter 6111.

ORDERS

1. Upon the effective date of these Orders, Respondent shall maintain compliance with the terms and conditions of these Orders, its NPDES permit and all applicable state and federal laws and regulations.
2. Within thirty (30) days of the effective date of these Orders, Respondent shall provide a report to Ohio EPA identifying the location of the sanitary sewers serving the Village of Gnadenhutzen.
3. Respondent shall undertake improvements to the WWTP as expeditiously as practicable, but not later than the dates contained in the following schedule:
 - a. Submit a facilities plan within thirty (30) days of the effective date of the Orders;
 - b. Submit complete PTI application and approvable detail plans for plant and sewer system improvements as soon as possible but not later than ninety (90) days after the effective date of these Orders;
 - c. Within thirty (30) days of effective date of the PTI, submit a loan application for financing to Ohio EPA's Division of Financial and Environmental Assistance (DEFA) or other source of funding for the project.
 - d. Advertise for construction bids within sixty (60) days of the effective date of the PTI;

- e. Initiate construction within five (5) months of the date of a financing agreement or award of funding referenced in Order 3(c) or within eight (8) months of the effective date of the PTI whichever is sooner;
 - f. Complete construction as soon as possible but not later than twelve (12) months from the date of initiation of construction.
4. Within 7 days of the milestones specified in Orders No. 3b through No. 3f, Respondent shall submit to Ohio EPA, written notification of the status of compliance with such Order to Ohio EPA at the following address:

Southeast District Office
(Attn DSW Enforcement Group Leader)
2195 Front Street
Logan, OH 43138

5. Not later than ninety (90) days from the effective date of these Findings and Orders, Respondent shall:
- a. Submit an inventory of all known industrial and commercial dischargers to the WWTP; and
 - b. Submit, for Ohio EPA's approval, an Interference Response Plan (IRP) that addresses actions Respondent shall take in the event that non conventional pollutants from industrial or commercial discharges are observed and can reasonably be expected to cause interference with the treatment capabilities of the WWTP. The IRP shall include, at a minimum:
 - i. Steps Respondent will take to investigate discharges;
 - ii. Steps Respondent will take to abate discharges, including enforcement actions that Respondent will take; and
 - iii. An obligation to contact Ohio EPA within 24 hours of observing discharges that can reasonably be expected to cause interference with the treatment capabilities of the WWTP.
6. Within thirty (30) days of receipt of any comments on the IRP required by Order No. 5, Respondent shall incorporate Ohio EPA's comments and resubmit the IRP to Ohio EPA for approval. Ohio EPA may modify the IRP and approve the IRP as modified. Upon approval of the IRP by Ohio EPA, Respondent shall implement the IRP.

7. Within four months of the effective date of these Findings and Orders, Respondent shall contract for an independent evaluation of the staffing requirements for properly operating and maintaining the WWTPs and submit a report to the Ohio EPA, SEDO for review and comment. The report shall provide in detail the number of hours required for proper operations, including the necessary operational and control test (e.g., biochemical oxygen demand (5-day), total suspended solids, pH, mixed liquor suspended solids, centrifuge, settleometer, settleability, dissolved oxygen, temperature, NPDES permit monitoring requirements, F/M ratio, and etc.), proper maintenance (i.e., routine preventive maintenance), laboratory time, travel time to and from the WWTPs, and yard maintenance.
8. Within thirty (30) day of receiving Ohio EPA's written comments on the staffing requirements, Respondent shall adequately respond to Ohio EPA's written comments by revising the report. Upon receiving a written approval from a representative of Ohio EPA's SEDO, Respondent shall incorporate the staffing requirements into the O & M manual.
9. Within thirty (30) days after the effective date of these Findings and Orders, Respondent shall advertise for and make its best effort to hire a wastewater treatment plant operator to operate and maintain its WWTP. This operator shall hold at least a Class II operator's license. In the event that Respondent is unable to hire a wastewater treatment plant operator, Respondent may continue to use a Technical Supervisor until such time as it is able to hire a wastewater treatment plant operator. In such case, Respondent shall submit an acceptable schedule for obtaining the services of a full-time employee with a Class II operator's license.
10. Respondent shall conduct daily inspections of the treatment plant and outfall. A log of inspections and corrective actions taken shall be kept and maintained for at least three (3) years.
11. Within seven (7) days of hiring a certified operator, Respondent shall submit to Ohio EPA Southeast District Office (SEDO) a copy of the operator's job description and signed contract. The documentation shall be submitted to the address set forth in Order No. 4 above.
12. Respondent shall report any noncompliance with these Orders in accordance with Part III, Paragraph 12, of its NPDES permit.
13. Respondent shall pay to Ohio EPA \$7,800.00 in settlement of the Ohio EPA's claim for civil penalties, which may be assessed pursuant to Chapter 6111 of the Ohio Revised Code. This payment shall be made by tendering a check payable

to the "Treasurer, State of Ohio" for the full amount within thirty (30) days after the effective date of these Findings and Orders to the following address:

Office of Fiscal Administration
Ohio Environmental Protection Agency
P.O. Box 1049
Columbus, Ohio 43216-1049

A photo copy of the check shall be sent to Ohio EPA's Southeast District Office at:

Ohio Environmental Protection Agency
Southeast District Office
2195 Front Street
Logan, OH 43138

OTHER APPLICABLE LAWS

All actions required to be taken pursuant to these Orders shall be undertaken in accordance with the requirements of all applicable local, state, and federal laws and regulations. Nothing in these Orders shall be construed as waiving or compromising in any way the applicability and enforcement of any other statutes or regulations applicable to Respondent's operation of its WWTP.

RESERVATION OF RIGHTS

These Orders do not prevent Ohio EPA from enforcing the terms of these Orders or from taking other administrative, legal or equitable action as deemed appropriate and necessary, including seeking penalties against Respondent for noncompliance with these Orders. These Orders do not prevent Ohio EPA from exercising its authority to require Respondent to perform additional activities pursuant to Chapter 6111 of the Ohio Revised Code or any other applicable law in the future. These Orders do not restrict the right of Respondent to raise any administrative, legal or equitable claim or defense for any additional activities that Ohio EPA may seek to require of Respondent. These Orders do not limit the authority of Ohio EPA to seek relief for violations not cited in these Orders.

TERMINATION

Respondent's obligations under these Orders shall be satisfied and terminate when Respondent demonstrates in writing and certifies to the satisfaction of the Ohio EPA

that all obligations under these Orders have been performed and the Chief of Ohio EPA's Division of Surface Water acknowledges the termination in writing.

This certification shall be submitted by the Respondent to the Southeast District Office (attention: DSW Enforcement Group Leader) and shall be signed by a responsible official of the Respondent. A responsible official is as defined in OAC Rule 3745-33-03(D)(4) for a municipal, state, or other public facility. The certification shall contain the following attestation:

I certify under the penalty of law that I have personally examined and am familiar with the information contained in or accompanying this certification, and based on inquiry of those individuals immediately responsible for obtaining the information, I believe the information contained in or accompanying this certification is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine or imprisonment.

UNAVOIDABLE DELAYS

Respondent shall cause all work to be performed in accordance with applicable schedules and time frames unless any such performance is prevented or delayed by an event which constitutes an unavoidable delay. For purposes of these Orders, an "unavoidable delay" shall mean an event beyond the control of Respondent which prevents or delays performance of any obligation required by these Orders and which could not be overcome by due diligence on the part of Respondent. Increased cost of compliance shall not be considered an event beyond the control of Respondent.

Respondent shall notify Ohio EPA in writing within five (5) days after the occurrence of an event which Respondent contends is an unavoidable delay. Such written notification shall describe the anticipated length of the delay, the cause or causes of the delay, the measures taken and to be taken by Respondent to minimize the delay, and the timetable under which these measures will be implemented. Respondent shall have the burden of demonstrating that the event constitutes unavoidable delay.

If Ohio EPA does not agree that the delay has been caused by an unavoidable delay, Ohio EPA will notify the Respondent in writing. If Ohio EPA agrees that the delay is attributable to an unavoidable delay, Ohio EPA will notify Respondent in writing of the length of the extension for the performance of the obligations affected by the unavoidable delay.

WAIVER

In order to resolve disputed claims, without admission of fact, violation or liability, and in

lieu of further enforcement action by Ohio EPA for only the violations specifically cited in these Orders, Respondent agrees to comply with these Orders, Respondent agrees that these Orders are lawful and reasonable, and Respondent agrees that the times provided for compliance herein are reasonable. Compliance with these Orders shall be a full accord and satisfaction of Respondent's liability for the violations specifically cited herein. Ohio EPA specifically does not waive its right to pursue actions and civil penalties as set forth in the Reservation of Rights paragraph of these Orders.

Respondent hereby waives the right to appeal the issuance, terms and service of these Orders, and it hereby waives any and all rights it might have to seek administrative or judicial review of these Orders either in law or equity.

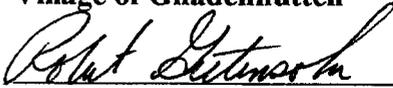
Notwithstanding the preceding, Ohio EPA and Respondent agree that in the event that these Orders are appealed by any other party to the Environmental Review Appeals Commission, or any court, Respondent retains the right to intervene and participate in such appeal. In such an event, Respondent agrees to continue to comply with these Orders notwithstanding such appeal and intervention unless these Orders are stayed, vacated, or modified.

SIGNATORY AUTHORITY

Each undersigned representative of a signatory to these Orders certifies that he or she is fully authorized to enter into the terms and conditions of these Orders and to legally bind such signatory to this document.

IT IS SO AGREED:

Village of Gnadenhutten



Date: 12-31-03

Robert Gutensohn
Mayor

IT IS SO ORDERED AND AGREED:

Ohio Environmental Protection Agency



Date: 2-2-04

Christopher Jones
Director

Attachment I

Table of NPDES Permit Violations

Outfall Number	Date (Month/Year) of Violation	Parameter Violated	Value Reported	Units	Permit Limitation
001	6/2003	Fecal Coliform	"AK"	#/100ml	2000
001	10/2002	Fecal Coliform	"AK"	#/100ml	2000
001	9/2002	Fecal Coliform	"AK"	#/100ml	2000
001	8/2002	Fecal Coliform	"AK"	#/100ml	2000
001	8/2002	Fecal Coliform	"AK"	#/100ml	1000
001	7/2002	Fecal Coliform	"AK"	#/100ml	2000
001	5/2002	Fecal Coliform	"AK"	#/100ml	2000
001	9/2001	Fecal Coliform	"AK"	#/100ml	2000
001	7/2001	Fecal Coliform	"AK"	#/100ml	2000
001	6/2001	Fecal Coliform	"AK"	#/100ml	2000
001	7/2000	Fecal Coliform	"AK"	#/100ml	2000
001	5/2000	Fecal Coliform	3816-"AK"	#/100ml	2000
001	10/1999	Fecal Coliform	"AK"	#/100ml	2000
001	9/1999	Fecal Coliform	"AK"	#/100ml	2000
001	8/1999	Fecal Coliform	11879-21239	#/100ml	2000
001	8/1999	Fecal Coliform	1121	#/100ml	1000
001	7/1999	Fecal Coliform	"AK"	#/100ml	2000
001	7/1999	Fecal Coliform	"AK"	#/100ml	1000
001	6/1999	Fecal Coliform	"AK"	#/100ml	2000
001	7/1998	Fecal Coliform	2828	#/100ml	2000
001	6/1998	Fecal Coliform	"AK"	#/100ml	2000
001	5/1998	Fecal Coliform	5123-"AK"	#/100ml	2000
001	7/1997	Fecal Coliform	"AK"	#/100ml	2000
001	5/1997	Fecal Coliform	"AK"	#/100ml	2000
001	5/1996	Fecal Coliform	"AK"	#/100ml	2000
001	9/2003	pH	6.2-6.4	S.U.	6.5 Minimum
001	8/2003	pH	6.0-6.4	S.U.	6.5 Minimum
001	7/2003	pH	6.0-6.4	S.U.	6.5 Minimum
001	6/2003	pH	6.0-6.4	S.U.	6.5 Minimum
001	2/2000	pH	9.7-10	S.U.	9.0 Maximum
001	7/1999	pH	6.2	S.U.	6.5 Minimum
001	9/1998	pH	6.0	S.U.	6.5 Minimum
001	2/1996	pH	6.4	S.U.	6.5 Minimum
001	1/1996	pH	6.1	S.U.	6.5 Minimum
001	9/1999	Chlorine Residual	0.04	mg/l	0.038
001	6/1998	Chlorine Residual	0.04	mg/l	0.038
001	8/1997	Chlorine Residual	0.08	mg/l	0.038
001	5/1997	Chlorine Residual	0.50	mg/l	0.038

Wastewater and NPDES Related Violations

Outfall Number	Date (Month/Year) of Violation	Parameter Violated	Value Reported	Units	Permit Limitation
001	8/2001	Suspended Solids	55	mg/l	45
001	6/2001	Suspended Solids	95	mg/l	45
001	6/2001	Suspended Solids	32	mg/l	30
001	8/2003	Silver, Total Recoverable	None	ug/l	Monitoring Required 1/Quarter
001	8/2003	Zinc, Total Recoverable	None	ug/l	Monitoring Required 1/Quarter
001	8/2003	Chromium, Total Recoverable	None	ug/l	Monitoring Required 1/Quarter
001	8/2003	Chromium, Dissolved Hex.	None	ug/l	Monitoring Required 1/Quarter
001	8/2003	Nickel, Total Recoverable	None	ug/l	Monitoring Required 1/Quarter
001	8/2003	Lead, Total Recoverable	None	ug/l	Monitoring Required 1/Quarter
001	8/2003	Copper, Total Recoverable	None	ug/l	Monitoring Required 1/Quarter
001	8/2003	Mercury, Total Recoverable	None	ug/l	Monitoring Required 1/Quarter
001	8/2003	Cadmium, Total Recoverable	None	ug/l	Monitoring Required 1/Quarter
001	6/2003	Silver, Total Recoverable	None	ug/l	Monitoring Required 1/Quarter
001	6/2003	Zinc, Total Recoverable	None	ug/l	Monitoring Required 1/Quarter
001	6/2003	Chromium, Total Recoverable	None	ug/l	Monitoring Required 1/Quarter
001	6/2003	Chromium, Dissolved Hex.	None	ug/l	Monitoring Required 1/Quarter
001	6/2003	Nickel, Total Recoverable	None	ug/l	Monitoring Required 1/Quarter
001	6/2003	Lead, Total Recoverable	None	ug/l	Monitoring Required 1/Quarter
001	6/2003	Copper, Total Recoverable	None	ug/l	Monitoring Required 1/Quarter
001	6/2003	Mercury, Total Recoverable	None	ug/l	Monitoring Required 1/Quarter
001	6/2003	Cadmium, Total Recoverable	None	ug/l	Monitoring Required 1/Quarter
001	3/2003	Silver, Total Recoverable	None	ug/l	Monitoring Required 1/Quarter
001	3/2003	Zinc, Total Recoverable	None	ug/l	Monitoring Required 1/Quarter
001	3/2003	Chromium, Total Recoverable	None	ug/l	Monitoring Required 1/Quarter
001	3/2003	Chromium, Dissolved Hex.	None	ug/l	Monitoring Required 1/Quarter
001	3/2003	Nickel, Total Recoverable	None	ug/l	Monitoring Required 1/Quarter
001	3/2003	Lead, Total Recoverable	None	ug/l	Monitoring Required 1/Quarter
001	3/2003	Copper, Total Recoverable	None	ug/l	Monitoring Required 1/Quarter
001	3/2003	Mercury, Total Recoverable	None	ug/l	Monitoring Required 1/Quarter
001	3/2003	Cadmium, Total Recoverable	None	ug/l	Monitoring Required 1/Quarter
001	3/2002	Silver, Total Recoverable	None	ug/l	Monitoring Required 1/Quarter
001	8/1998	Silver, Total Recoverable	None	ug/l	Monitoring Required 1/Quarter
001	3/1996	Cadmium, Total Recoverable	None	ug/l	Monitoring Required 1/Quarter
001	6/2001	Suspended Solids	None	mg/l	Monitoring Required 2/Week
001	2/2001	Suspended Solids	None	mg/l	Monitoring Required 2/Week
001	5/2002	CBOD ₅	1/Week	mg/l	Monitoring Required 2/Week
001	3/2000	CBOD ₅	None	mg/l	Monitoring Required 2/Week
001	7/2003	Ammonia	1/Week	mg/l	Monitoring Required 2/Week
001	3/2003	Ammonia	1/Week	mg/l	Monitoring Required 2/Week

Wastewater and NPDES Related Violations

Outfall Number	Date (Month/Year) of Violation	Parameter Violated	Value Reported	Units	Permit Limitation
001	1/2002	Flow Rate	"AA"	MGD	Monitoring Required Daily
001	12/2001	Flow Rate	"AA"	MGD	Monitoring Required Daily
001	11/2001	Flow Rate	0	MGD	Monitoring Required Daily
001	7/2001	Flow Rate	"AD"	MGD	Monitoring Required Daily
001	6/2001	Flow Rate	"AD"	MGD	Monitoring Required Daily
001	5/2001	Flow Rate	"AD"	MGD	Monitoring Required Daily
001	4/2001	Flow Rate	"AD"	MGD	Monitoring Required Daily
001	3/2001	Flow Rate	"AD"	MGD	Monitoring Required Daily
001	2/2001	Flow Rate	"AD"	MGD	Monitoring Required Daily
001	12/2000	Flow Rate	"AD"	MGD	Monitoring Required Daily
001	10/2000	Flow Rate	"AD"	MGD	Monitoring Required Daily
581	12/1999	Sludge Weight	None	Dry Tons	Monitoring Required 1/Month
581	5/2002	% Total Solids	None	%	Monitoring Required 1/Month
581	4/2002	% Total Solids	None	%	Monitoring Required 1/Month
581	3/2002	% Total Solids	None	%	Monitoring Required 1/Month
581	2/2002	% Total Solids	None	%	Monitoring Required 1/Month
581	1/2002	% Total Solids	None	%	Monitoring Required 1/Month
581	11/2001	% Total Solids	None	%	Monitoring Required 1/Month
581	3/2000	% Total Solids	None	%	Monitoring Required 1/Month
581	2/2000	% Total Solids	None	%	Monitoring Required 1/Month
581	1/2000	% Total Solids	None	%	Monitoring Required 1/Month
581	12/1999	% Total Solids	None	%	Monitoring Required 1/Month
581	11/1999	% Total Solids	None	%	Monitoring Required 1/Month
581	10/1999	% Total Solids	None	%	Monitoring Required 1/Month
581	12/1996	% Total Solids	None	%	Monitoring Required 1/Month
581	11/1996	% Total Solids	None	%	Monitoring Required 1/Month
581	10/1996	% Total Solids	None	%	Monitoring Required 1/Month
581	9/1996	% Total Solids	None	%	Monitoring Required 1/Month
581	8/1996	% Total Solids	None	%	Monitoring Required 1/Month
581	7/1996	% Total Solids	None	%	Monitoring Required 1/Month
581	6/1996	% Total Solids	None	%	Monitoring Required 1/Month
581	5/1996	% Total Solids	None	%	Monitoring Required 1/Month
581	4/1996	% Total Solids	None	%	Monitoring Required 1/Month
581	3/1996	% Total Solids	None	%	Monitoring Required 1/Month
581	2/1996	% Total Solids	None	%	Monitoring Required 1/Month
581	1/1996	% Total Solids	None	%	Monitoring Required 1/Month
581	12/1995	% Total Solids	None	%	Monitoring Required 1/Month
581	11/1995	% Total Solids	None	%	Monitoring Required 1/Month
581	10/1995	% Total Solids	None	%	Monitoring Required 1/Month
581	9/1995	% Total Solids	None	%	Monitoring Required 1/Month
581	8/1995	% Total Solids	None	%	Monitoring Required 1/Month
581	7/1995	% Total Solids	None	%	Monitoring Required 1/Month

Wastewater and NPDES Related Violations

Outfall Number	Date (Month/Year) of Violation	Parameter Violated	Value Reported	Units	Permit Limitation
581	6/1995	% Total Solids	None	%	Monitoring Required 1/Month
581	5/1995	% Total Solids	None	%	Monitoring Required 1/Month
581	4/1995	% Total Solids	None	%	Monitoring Required 1/Month
581	3/1995	% Total Solids	None	%	Monitoring Required 1/Month
581	2/1995	% Total Solids	None	%	Monitoring Required 1/Month
581	1/1995	% Total Solids	None	%	Monitoring Required 1/Month
581	12/2001	% Volatile Solids	None	%	Monitoring Required 1/Month
581	12/1999	% Volatile Solids	None	%	Monitoring Required 1/Month
581	12/1996	% Volatile Solids	None	%	Monitoring Required 1/Month
581	11/1996	% Volatile Solids	None	%	Monitoring Required 1/Month
581	10/1996	% Volatile Solids	None	%	Monitoring Required 1/Month
581	9/1996	% Volatile Solids	None	%	Monitoring Required 1/Month
581	8/1996	% Volatile Solids	None	%	Monitoring Required 1/Month
581	7/1996	% Volatile Solids	None	%	Monitoring Required 1/Month
581	6/1996	% Volatile Solids	None	%	Monitoring Required 1/Month
581	5/1996	% Volatile Solids	None	%	Monitoring Required 1/Month
581	4/1996	% Volatile Solids	None	%	Monitoring Required 1/Month
581	3/1996	% Volatile Solids	None	%	Monitoring Required 1/Month
581	2/1996	% Volatile Solids	None	%	Monitoring Required 1/Month
581	1/1996	% Volatile Solids	None	%	Monitoring Required 1/Month
581	12/1995	% Volatile Solids	None	%	Monitoring Required 1/Month
581	11/1995	% Volatile Solids	None	%	Monitoring Required 1/Month
581	10/1995	% Volatile Solids	None	%	Monitoring Required 1/Month
581	9/1995	% Volatile Solids	None	%	Monitoring Required 1/Month
581	8/1995	% Volatile Solids	None	%	Monitoring Required 1/Month
581	7/1995	% Volatile Solids	None	%	Monitoring Required 1/Month
581	6/1995	% Volatile Solids	None	%	Monitoring Required 1/Month
581	5/1995	% Volatile Solids	None	%	Monitoring Required 1/Month
581	4/1995	% Volatile Solids	None	%	Monitoring Required 1/Month
581	3/1995	% Volatile Solids	None	%	Monitoring Required 1/Month
581	2/1995	% Volatile Solids	None	%	Monitoring Required 1/Month
581	1/1995	% Volatile Solids	None	%	Monitoring Required 1/Month
581	9/2003	Arsenic	None	mg/kg	Monitoring Required 1/Year
581	9/2003	Cadmium	None	mg/kg	Monitoring Required 1/Year
581	9/2003	Chromium	None	mg/kg	Monitoring Required 1/Year
581	9/2003	Copper	None	mg/kg	Monitoring Required 1/Year
581	9/2003	Lead	None	mg/kg	Monitoring Required 1/Year
581	9/2003	Nickel	None	mg/kg	Monitoring Required 1/Year
581	9/2003	Zinc	None	mg/kg	Monitoring Required 1/Year
581	9/2003	Selenium	None	mg/kg	Monitoring Required 1/Year
581	9/2003	Mercury	None	mg/kg	Monitoring Required 1/Year
581	9/2003	Molybdenum	None	mg/kg	Monitoring Required 1/Year

Wastewater and NPDES Related Violations

Outfall Number	Date (Month/Year) of Violation	Parameter Violated	Value Reported	Units	Permit Limitation
601	12/1999	Temperature	None	°C	Monitoring Required Daily
601	10/1997	Temperature	None	°C	Monitoring Required Daily
601	12/1999	pH	None	S.U.	Monitoring Required Daily
601	10/1997	pH	None	S.U.	Monitoring Required Daily
601	3/2000	Suspended Solids	None	mg/l	Monitoring Required 2/Week
601	2/2000	Suspended Solids	None	mg/l	Monitoring Required 2/Week
601	12/1999	Suspended Solids	None	mg/l	Monitoring Required 2/Week
601	10/1997	Suspended Solids	None	mg/l	Monitoring Required 2/Week
601	3/2000	CBOD ₅	None	mg/l	Monitoring Required 2/Week
601	2/2000	CBOD ₅	None	mg/l	Monitoring Required 2/Week
601	12/1999	CBOD ₅	None	mg/l	Monitoring Required 2/Week
601	10/1997	CBOD ₅	None	mg/l	Monitoring Required 2/Week