

STATE OF LOUISIANA

DEPARTMENT OF ENVIRONMENTAL QUALITY

IN THE MATTER OF:

LAKELAND PARK SEWERAGE  
ASSOCIATION

AI # 18177

PROCEEDINGS UNDER THE LOUISIANA  
ENVIRONMENTAL QUALITY ACT  
LA. R.S. 30:2001, ET SEQ.

\* Settlement Tracking No.  
\* SA-WE-18-0009  
\*  
\*  
\* Enforcement Tracking No.  
\* WE-CN-03-0715  
\* WE-C-09-0151  
\*  
\*  
\* Docket No. 2009-10584-EQ  
\*

SETTLEMENT

The following Settlement is hereby agreed to between Lakeland Park Sewerage Association (“Respondent”) and the Department of Environmental Quality (“DEQ” or “the Department”), under authority granted by the Louisiana Environmental Quality Act, La. R.S. 30:2001, et seq. (“the Act”).

I

Respondent is a non-profit corporation that owns and/or operates a sanitary sewage treatment facility located in Baton Rouge, East Baton Rouge Parish, Louisiana (“the Facility”).

II

On September 24, 2008, the Department issued to Respondent a Consolidated Compliance Order & Notice of Potential Penalty, Enforcement No. WE-CN-03-0715 (Exhibit 1).

On May 13, 2009, the Department issued to Respondent a Compliance Order, Enforcement No. WE-C-09-0151 (Exhibit 2).

The following violations, although not cited in the foregoing enforcement action(s), are included within the scope of this settlement:

An inspection conducted by the Department on or about November 16, 2012, and subsequent file reviews conducted by the Department on or about April 5, 2017 and June 22, 2018, revealed the following effluent exceedances as reported by the Respondent on Discharge Monitoring reports (DMRs) and are summarized on Table 1 (see Table 1 attached as Exhibit 3). Each effluent exceedance is in violation of LPDES permit LAG570036 (prior to August 22, 2014, Part I, Section B, page 4 of 8, and after August 22, 2014, Part I, Section B, Pages 2 and 3 of 19, and Standard Conditions, section A.2), La. R.S.30:2076 (A)(3), and LAC 33:IX.501.A.

### III

In response to the Consolidated Compliance Order & Notice of Potential Penalty, Respondent made a timely request for a hearing.

### IV

Respondent denies it committed any violations or that it is liable for any fines, forfeitures and/or penalties.

### V

Nonetheless, Respondent, without making any admission of liability under state or federal statute or regulation, agrees to pay, and the Department agrees to accept, a payment in the amount of SEVENTEEN THOUSAND FIVE HUNDRED AND NO/100 DOLLARS (\$17,500.00), of which Nine Hundred Seventy-Nine and 97/100 Dollars (\$979.97) represents the Department's enforcement costs, in settlement of the claims set forth in this agreement. The total amount of money expended by Respondent on cash payments to the Department as described above, shall be considered a civil penalty for tax purposes, as required by La. R.S. 30:2050.7(E)(1).

### VI

Respondent further agrees that the Department may consider the inspection report(s), permit

record(s), the Consolidated Compliance Order & Notice of Potential Penalty, Compliance Order and this Settlement for the purpose of determining compliance history in connection with any future enforcement or permitting action by the Department against Respondent, and in any such action Respondent shall be estopped from objecting to the above-referenced documents being considered as proving the violations alleged herein for the sole purpose of determining Respondent's compliance history.

## VII

This agreement shall be considered a final order of the Secretary for all purposes, including, but not limited to, enforcement under La. R.S. 30:2025(G)(2), and Respondent hereby waives any right to administrative or judicial review of the terms of this agreement, except such review as may be required for interpretation of this agreement in any action by the Department to enforce this agreement.

## VIII

This settlement is being made in the interest of settling the state's claims and avoiding for both parties the expense and effort involved in litigation or an adjudicatory hearing. In agreeing to the compromise and settlement, the Department considered the factors for issuing civil penalties set forth in La. R. S. 30:2025(E) of the Act.

## IX

As required by law, the Department has submitted this Settlement Agreement to the Louisiana Attorney General for approval or rejection. The Attorney General's concurrence is appended to this Settlement Agreement.

## X

The Respondent has caused a public notice advertisement to be placed in the official journal

of the parish governing authority in East Baton Rouge Parish, Louisiana. The advertisement, in form and wording approved by the Department, announced the availability of this settlement for public view and comment and the opportunity for a public hearing. Respondent has submitted an original proof-of-publication affidavit and an original public notice to the Department and, as of the date this Settlement is executed on behalf of the Department, more than forty-five (45) days have elapsed since publication of the notice.

#### XI

Payment is to be made within ten (10) days from notice of the Secretary's signature. If payment is not received within that time, this Agreement is voidable at the option of the Department. Payments are to be made by check, payable to the Department of Environmental Quality, and mailed or delivered to the attention of Accountant Administrator, Financial Services Division, Department of Environmental Quality, Post Office Box 4303, Baton Rouge, Louisiana, 70821-4303. Each payment shall be accompanied by a completed Settlement Payment Form (Exhibit A).

#### XII

In consideration of the above, any claims for penalties are hereby compromised and settled in accordance with the terms of this Settlement.

#### XIII

Each undersigned representative of the parties certifies that he or she is fully authorized to execute this Settlement Agreement on behalf of his or her respective party, and to legally bind such party to its terms and conditions.



LAKELAND PARK SEWERAGE  
ASSOCIATION

BS

BY: [Signature]  
(Signature)

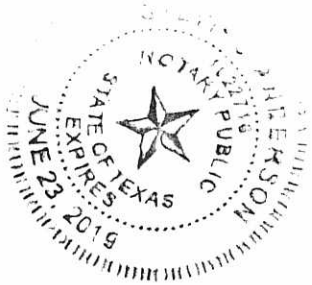
RICKY MOORE  
(Printed)

TITLE: PRESIDENT

THUS DONE AND SIGNED in duplicate original before me this 30th day of August, 2018, at Houston Texas

[Signature]  
NOTARY PUBLIC (ID # 1022716)

Gyria J. Anderson  
(stamped or printed)



LOUISIANA DEPARTMENT OF  
ENVIRONMENTAL QUALITY  
Chuck Carr Brown, Ph.D., Secretary

BY: [Signature]  
Loures Iturralde, Assistant Secretary  
Office of Environmental Compliance

THUS DONE AND SIGNED in duplicate original before me this 29th day of Nov, 2018, at Baton Rouge, Louisiana

[Signature]  
NOTARY PUBLIC (ID # 19181)

Perry Theriot  
(stamped or printed)

Approved: [Signature]  
Loures Iturralde, Assistant Secretary

BOBBY JINDAL  
GOVERNOR



HAROLD LEGGETT, PH.D.  
SECRETARY

**State of Louisiana**  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
OFFICE OF ENVIRONMENTAL COMPLIANCE

September 24, 2008

CERTIFIED MAIL (7003 2260 0001 2748 7968)  
RETURN RECEIPT REQUESTED

LAKELAND PARK SEWERAGE ASSOCIATION  
c/o John L. Henchy, Agent of Service  
Matchet, Verbois, Futrell & Henchy  
Wrenwood Blvd, Suite C  
Baton Rouge, LA 70809

RE: **CONSOLIDATED COMPLIANCE ORDER  
& NOTICE OF POTENTIAL PENALTY  
ENFORCEMENT TRACKING NO. WE-CN-03-0715  
AGENCY INTEREST NO. 18177**

Dear Sir:

Pursuant to the Louisiana Environmental Quality Act (La. R.S. 30:2001, et seq.), the attached **CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY** is hereby served on the **LAKELAND PARK SEWERAGE ASSOCIATION (RESPONDENT)** for the violations described therein.

Compliance is expected within the maximum time period established by each part of the **COMPLIANCE ORDER**. The violations cited in the **CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY** could result in the issuance of a civil penalty or other appropriate legal actions.

Any questions concerning this action should be directed to Naz Zanjani-Bachar at (225) 219-3778.

Sincerely,

Lourdes M. Iturralde  
Administrator  
Enforcement Division

LMI/NZB/nzb  
Alt ID No. LAG570036  
Attachment



c: Ms. Carol Peters-Wagnon  
U.S. Environmental Protection Agency, Region 6

Chuck Methvien, Regional Sanitation Director

STATE OF LOUISIANA  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
OFFICE OF ENVIRONMENTAL COMPLIANCE

IN THE MATTER OF

LAKELAND PARK SEWERAGE  
ASSOCIATION  
EAST BATON ROUGE PARISH  
ALT ID NO. LAG570036

PROCEEDINGS UNDER THE LOUISIANA  
ENVIRONMENTAL QUALITY ACT,  
La. R.S. 30:2001, ET SEQ.

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\*  
\* ENFORCEMENT TRACKING NO.  
\* WE-CN-03-0715  
\*  
\* AGENCY INTEREST NO.  
\*  
\* 18177  
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CONSOLIDATED  
COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY

The following **CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY** is issued to the **LAKELAND PARK SEWERAGE ASSOCIATION (RESPONDENT)** by the Louisiana Department of Environmental Quality (the Department), under the authority granted by the Louisiana Environmental Quality Act (the Act), La. R.S. 30:2001, et seq., and particularly by La. R.S. 30:2025(C), 30:2050.2 and 30:2050.3(B).

**FINDINGS OF FACT**

I.

The Respondent owns and/or operates an existing sanitary sewage treatment facility which serves the Lakeland Park Sewerage Association located at 12021 Lakeland Park Blvd., Suite 212, in Baton Rouge, East Baton Rouge Parish, Louisiana. The Respondent was granted



coverage under Louisiana Pollutant Discharge Elimination System (LPDES) General Permit LAG570000 on December 4, 1997 and was specifically assigned permit number LAG570036. The permit expired on September 30, 2002, and was administratively extended. The Respondent submitted a permit renewal application on July 2, 2004. LPDES permit LAG570036 was reissued to the Respondent on or about July 11, 2005, and will expire on March 14, 2009. Under the terms and conditions of the LPDES permit, the Respondent is authorized to discharge treated sanitary wastewater from Outfall 001 into an unnamed ditch, thence into Clay Cut Bayou, thence into the Amite River, all waters of the state.

## II.

An inspection conducted by the Department on or about February 28, 2001, revealed that the Respondent had operation and maintenance deficiencies. Specifically, there were no chlorine tablets in the chlorine contact chamber; the weirs had excessive growth obstructing flow; there were solids present on the ground around the base of the plant; and the effluent was gray/brown in color with a slight odor. Vegetation growth was also observed in the weirs during an inspection conducted by the Department on or about January 28, 2003. The failure to properly operate and maintain the facility constitutes a violation of LPDES permit LAG570036. (Part III, Sections A.2 and B.3.a); La. R. S. 30:2076 (A) (3), LAC 33:IX.501.A, LAC 33:IX.2701.A, and LAC 33:IX.2701.E.

## III.

An inspection conducted by the Department on or about February 28, 2001, revealed that the Respondent failed to follow approved test methods. Specifically, the pH holding times were being exceeded. Each failure to utilize approved test methods constitutes a violation of LPDES permit LAG570036 (Part I, Section C.1, Part III, Sections A.2 and C.5), La. R. S. 30:2076 (A) (3), LAC 33:IX.501.A, LAC 33:IX.2701.A, and LAC 33:IX.2701.J.4.

## IV.

An inspection conducted by the Department on or about February 28, 2001, and a subsequent file review conducted by the Department on or about April 10, 2008, revealed that the Respondent failed to submit Discharge Monitoring Reports (DMRs) as required by the permit. Specifically, the Respondent failed to submit DMRs for the following monitoring period: January, July, August and September of 2001; January through June, and October through December of 2003; January through September of 2004; and January through September of 2005. Each failure to submit DMRs is a violation of LPDES permit LAG570036 (Part I, Section C, and Part III, Sections A.2 and D.4), La. R.S. 30:2076 (A) (3), LAC 33:IX.501.A, LAC 33:IX.2701.A, and LAC 33:IX.2701.L.4.a.

## V.

Inspections conducted by the Department on or about February 28, 2001, and on January 28, 2003, and a subsequent file review conducted by the Department on or about April 10, 2008, revealed the Respondent exceeded effluent limitations. These effluent exceedances, as reported by the Respondent on Discharge Monitoring Reports (DMRs), are summarized below:

Date	Parameter	Permit Limit	Reported Value
March 2001**	BOD <sub>5</sub> (mon avg)	10 mg/L	15 mg/L
	TSS (mon avg)	15 mg/L	128 mg/L
	TSS (wkly avg)	23 mg/L	128 mg/L
April 2001**	BOD <sub>5</sub> (mon avg)	10 mg/L	34 mg/L
	BOD <sub>5</sub> (wkly avg)	15 mg/L	34 mg/L
	TSS (mon avg)	15 mg/L	35 mg/L
	TSS (wkly avg)	23 mg/L	35 mg/L
	Fecal Coliform (mon avg)	200 col/100 ml	5,000 col/100ml
May 2001**	Fecal Coliform (wkly avg)	400 col/100 ml	5,000 col/100ml
	BOD <sub>5</sub> (mon avg)	10 mg/L	34 mg/L
November 2001**	BOD <sub>5</sub> (wkly avg)	15 mg/L	34 mg/L
	TSS (mon avg)	15 mg/L	28 mg/L
	TSS (wkly avg)	23 mg/L	28 mg/L
	Fecal Coliform (mon avg)	200 col/100 ml	TNTC*
	Fecal Coliform (wkly avg)	400 col/100 ml	TNTC*
	BOD <sub>5</sub> (mon avg)	10 mg/L	17 mg/L
December 2001**	BOD <sub>5</sub> (wkly avg)	15 mg/L	17 mg/L
	TSS (mon avg)	15 mg/L	23 mg/L
	TSS (wkly avg)	23 mg/L	30 mg/L
January 2002**	TSS (mon avg)	15 mg/L	30 mg/L
	BOD <sub>5</sub> (mon avg)	10 mg/L	12 mg/L
	TSS (mon avg)	15 mg/L	63 mg/L
February 2002**	TSS (wkly avg)	23 mg/L	63 mg/L
	BOD <sub>5</sub> (mon avg)	10 mg/L	21 mg/L
	BOD <sub>5</sub> (wkly avg)	15 mg/L	21 mg/L
March 2002**	TSS (mon avg)	15 mg/L	23 mg/L
	TSS (wkly avg)	23 mg/L	30 mg/L
	BOD <sub>5</sub> (mon avg)	10 mg/L	30 mg/L
	BOD <sub>5</sub> (wkly avg)	15 mg/L	30 mg/L
	Fecal Coliform (mon avg)	200 col/100 ml	360 col/100ml
April 2002**	TSS (mon avg)	15 mg/L	53 mg/L
	TSS (wkly avg)	23 mg/L	53 mg/L
May 2002**	TSS (mon avg)	15 mg/L	22 mg/L
June 2002**	TSS (mon avg)	15 mg/L	17 mg/L
July 2002**	TSS (mon avg)	15 mg/L	18 mg/L
August 2002**	BOD <sub>5</sub> (mon avg)	10 mg/L	12 mg/L
	TSS (mon avg)	15 mg/L	25 mg/L
	TSS (wkly avg)	23 mg/L	25 mg/L
September 2002**	TSS (mon avg)	15 mg/L	43 mg/L
	TSS (wkly avg)	23 mg/L	43 mg/L
October 2002**	TSS (mon avg)	15 mg/L	21 mg/L
November 2002**	TSS (mon avg)	15 mg/L	20 mg/L



Date	Parameter	Permit Limit	Reported Value
December 2002**	BOD <sub>5</sub> (mon avg)	10 mg/L	17 mg/L
	BOD <sub>5</sub> (wkly avg)	15 mg/L	17 mg/L
	Fecal Coliform (mon avg)	200 col/100 ml	2,000 col/100ml
	Fecal Coliform (wkly avg)	400 col/100 ml	2,000 col/100ml
July 2003**	TSS (mon avg)	15 mg/L	33.3 mg/L
	TSS (wkly avg)	23 mg/L	33.3 mg/L
	Fecal Coliform (mon avg)	200 col/100 ml	TNTC*
	Fecal Coliform (wkly avg)	400 col/100 ml	TNTC*
August 2003**	BOD <sub>5</sub> (mon avg)	10 mg/L	27.2 mg/L
	BOD <sub>5</sub> (wkly avg)	15 mg/L	27.2 mg/L
	TSS (mon avg)	15 mg/L	41 mg/L
	TSS (wkly avg)	23 mg/L	41 mg/L
	Fecal Coliform (mon avg)	200 col/100 ml	TNTC*
	Fecal Coliform (wkly avg)	400 col/100 ml	TNTC*
September 2003**	BOD <sub>5</sub> (mon avg)	10 mg/L	18.9 mg/L
	BOD <sub>5</sub> (wkly avg)	15 mg/L	18.9 mg/L
	TSS (mon avg)	15 mg/L	21 mg/L
November 2004**	TSS (mon avg)	15 mg/L	24.7 mg/L
	TSS (wkly avg)	23 mg/L	24.7 mg/L
October 2005**	Fecal Coliform (mon avg)	200 col/100 ml	670 col/100 ml
	Fecal Coliform (wkly avg)	400 col/100 ml	670 col/100 ml
November 2005**	BOD <sub>5</sub> (mon avg)	10 mg/L	94.8 mg/L
	BOD <sub>5</sub> (wkly avg)	15 mg/L	94.8 mg/L
	TSS (mon avg)	15 mg/L	124 mg/L
	TSS (wkly avg)	23 mg/L	124 mg/L
December 2005**	BOD <sub>5</sub> (mon avg)	10 mg/L	24.8 mg/L
	BOD <sub>5</sub> (wkly avg)	15 mg/L	24.8 mg/L
	TSS (mon avg)	15 mg/L	103 mg/L
	TSS (wkly avg)	23 mg/L	103 mg/L
March 2006**	TSS (mon avg)	15 mg/L	19.2 mg/L
April 2006**	BOD <sub>5</sub> (mon avg)	10 mg/L	11.5 mg/L
	TSS (mon avg)	15 mg/L	52.4 mg/L
	TSS (wkly avg)	23 mg/L	52.4 mg/L
May 2006**	TSS (mon avg)	15 mg/L	38.4 mg/L
	TSS (wkly avg)	23 mg/L	38.4 mg/L
June 2006**	TSS (mon avg)	15 mg/L	18 mg/L
July 2006	BOD <sub>5</sub> (mon avg)	10 mg/L	15.9 mg/L
	BOD <sub>5</sub> (wkly avg)	15 mg/L	15.9 mg/L
	TSS (mon avg)	15 mg/L	80 mg/L
	TSS (wkly avg)	23 mg/L	80 mg/L
	Fecal Coliform (mon avg)	200 col/100 ml	TNTC*
	Fecal Coliform (wkly avg)	400 col/100 ml	TNTC*
August 2006**	TSS (mon avg)	15 mg/L	33.2 mg/L
	TSS (wkly avg)	23 mg/L	33.2 mg/L



Date	Parameter	Permit Limit	Reported Value
September 2006**	BOD <sub>5</sub> (mon avg)	10 mg/L	57.5 mg/L
	BOD <sub>5</sub> (wkly avg)	15 mg/L	57.5 mg/L
October 2006**	TSS (mon avg)	15 mg/L	24 mg/L
	TSS (wkly avg)	23 mg/L	24 mg/L
November 2006**	TSS (mon avg)	15 mg/L	32.4 mg/L
	TSS (wkly avg)	23 mg/L	32.4 mg/L
December 2006**	TSS (mon avg)	15 mg/L	46.8 mg/L
	TSS (wkly avg)	23 mg/L	46.8 mg/L
	Fecal Coliform (mon avg)	200 col/100 ml	TNTC*
	Fecal Coliform (wkly avg)	400 col/100 ml	>2,000 col/100 ml
January 2007**	BOD <sub>5</sub> (mon avg)	10 mg/L	50.6 mg/L
	BOD <sub>5</sub> (wkly avg)	15 mg/L	50.6 mg/L
	TSS (mon avg)	15 mg/L	57.9 mg/L
	TSS (wkly avg)	23 mg/L	57.9 mg/L
February 2007**	BOD <sub>5</sub> (mon avg)	10 mg/L	16.9 mg/L
	BOD <sub>5</sub> (wkly avg)	15 mg/L	16.9 mg/L
March 2007**	BOD <sub>5</sub> (mon avg)	10 mg/L	15 mg/L
	TSS (mon avg)	15 mg/L	68 mg/L
	TSS (wkly avg)	23 mg/L	68 mg/L
April 2007**	BOD <sub>5</sub> (mon avg)	10 mg/L	10.6 mg/L
	TSS (mon avg)	15 mg/L	55.6 mg/L
	TSS (wkly avg)	23 mg/L	55.6 mg/L
May 2007**	Fecal Coliform (mon avg)	200 col/100 ml	TNTC*
	Fecal Coliform (wkly avg)	400 col/100 ml	>2,000 col/100 ml
June 2007**	TSS (mon avg)	15 mg/L	55.2 mg/L
	TSS (wkly avg)	23 mg/L	55.2 mg/L
July 2007**	TSS (mon avg)	15 mg/L	38.4 mg/L
	TSS (wkly avg)	23 mg/L	38.4 mg/L
August 2007**	BOD <sub>5</sub> (mon avg)	10 mg/L	12 mg/L
	TSS (mon avg)	15 mg/L	34 mg/L
	TSS (wkly avg)	23 mg/L	34 mg/L
	Fecal Coliform (mon avg)	200 col/100 ml	60,000 col/100 ml
	Fecal Coliform (wkly avg)	400 col/100 ml	60,000 col/100 ml
December 2007**	BOD <sub>5</sub> (mon avg)	10 mg/L	38 mg/L
	BOD <sub>5</sub> (wkly avg)	15 mg/L	38 mg/L
	TSS (mon avg)	15 mg/L	27 mg/L
	TSS (wkly avg)	23 mg/L	27 mg/L
	Fecal Coliform (mon avg)	200 col/100 ml	3,000 col/100 ml
	Fecal Coliform (wkly avg)	400 col/100 ml	3,000 col/100 ml
January 2008**	TSS (mon avg)	15 mg/L	43 mg/L
	TSS (wkly avg)	23 mg/L	43 mg/L
April 2008**	TSS (mon avg)	15 mg/L	20 mg/L

\* TNTC means Too Numerous To Count

\*\*Failed to submit a non-compliance report

Each effluent excursion constitutes a violation of LPDES permit LAG570036 (Part I, Section B and Part III Section A.2), La. R.S. 30:2076(A)(1), La. R.S. 30:2076(A)(3), LAC 33:IX.501.A, LAC 33:IX.501.D, and LAC 33:IX.2701.A. Each failure to submit a noncompliance report is a violation of LPDES permit LAG570036 (Part III, Sections A.2 and D.7), La R.S. 30:2076(A)(3), La R.S. 30:2076(D), LAC 33:IX.501.A, LAC 33:IX.2701.A, and LAC 33:IX.2701.L.7.

### COMPLIANCE ORDER

Based on the foregoing, the Respondent is **hereby ordered**:

#### I.

To immediately take, upon receipt of this **COMPLIANCE ORDER**, any and all steps necessary to meet and maintain compliance with LPDES permit LAG570036, including but not limited to, submitting non-compliance reports for permit exceedances, utilizing approved test methods, submitting DMRs and properly operating and maintaining the facility.

#### II.

In the event the respondent believes that complete correction is not physically possible within thirty (30) days, the Respondent shall submit, within thirty (30) days after receipt of this **COMPLIANCE ORDER**, a comprehensive plan for the expeditious elimination and prevention of such noncomplying discharges. Such plan shall provide for specific corrective actions to be taken and shall include a critical path schedule for the achievement of compliance within the shortest time possible.

#### III.

To submit to the Enforcement Division, within thirty (30) days after receipt of this **COMPLIANCE ORDER**, properly completed Discharge Monitoring Reports (DMRs) for the monitoring period of January through October of 2005. If you are submitting copies of DMRs,

please be advised that each copy of the DMR shall be signed and dated with an original signature. If no sampling or monitoring was conducted during a monitoring period, the Respondent should indicate this in the space provided for "Comment and Explanation of Any Violations."

IV.

To submit to the Enforcement Division, within thirty (30) days after receipt of this **COMPLIANCE ORDER**, a written report that includes a detailed description of the circumstances surrounding the cited violations and actions taken or to be taken to achieve compliance with the Order Portion of this **COMPLIANCE ORDER**. This report and all other reports or information required to be submitted to the Enforcement Division by this **COMPLIANCE ORDER** shall be submitted to:

Office of Environmental Compliance  
Post Office Box 4312  
Baton Rouge, Louisiana 70821-4312  
**Attention: Naz Zanjani-Bachar**  
**Enforcement Tracking No. WE-CN-03-0715**  
**AI No. 18177**

**THE RESPONDENT SHALL FURTHER BE ON NOTICE THAT:**

I.

The Respondent has a right to an adjudicatory hearing on a disputed issue of material fact or of law arising from this **COMPLIANCE ORDER**. This right may be exercised by filing a written request with the Secretary no later than thirty (30) days after receipt of this **COMPLIANCE ORDER**.



II.

The request for an adjudicatory hearing shall specify the provisions of the **COMPLIANCE ORDER** on which the hearing is requested and shall briefly describe the basis for the request. This request should reference the **Enforcement Tracking Number** and **Agency Interest Number**, which are located in the upper right-hand corner of the first page of this document and should be directed to the following:

Department of Environmental Quality  
Office of the Secretary  
Post Office Box 4302  
Baton Rouge, Louisiana 70821-4302  
**Attn: Hearings Clerk, Legal Division**  
**Re: Enforcement Tracking No. WE-CN-03-0715**  
**Agency Interest No. 18177**

III.

Upon the Respondent's timely filing a request for a hearing, a hearing on the disputed issue of material fact or of law regarding this **COMPLIANCE ORDER** may be scheduled by the Secretary of the Department. The hearing shall be governed by the Act, the Administrative Procedure Act (La. R.S. 49:950, et seq.), and the Department's Rules of Procedure. The Department may amend or supplement this **COMPLIANCE ORDER** prior to the hearing, after providing sufficient notice and an opportunity for the preparation of a defense for the hearing.

IV.

This **COMPLIANCE ORDER** shall become a final enforcement action unless the request for hearing is timely filed. Failure to timely request a hearing constitutes a waiver of the Respondent's right to a hearing on a disputed issue of material fact or of law under Section 2050.4 of the Act for the violation(s) described herein.



V.

The Respondent's failure to request a hearing or to file an appeal or the Respondent's withdrawal of a request for hearing on this **COMPLIANCE ORDER** shall not preclude the Respondent from contesting the findings of facts in any subsequent penalty action addressing the same violation(s), although the Respondent is estopped from objecting to this **COMPLIANCE ORDER** becoming a permanent part of its compliance history.

VI.

Civil penalties of not more than twenty-seven thousand five hundred dollars (\$27,500) for each day of violation for the violation(s) described herein may be assessed. For violations which occurred on August 15, 2004, or after, civil penalties of not more than thirty-two thousand five hundred dollars (\$32,500) may be assessed for each day of violation. The Respondent's failure or refusal to comply with this **COMPLIANCE ORDER** and the provisions herein will subject the Respondent to possible enforcement procedures under La. R.S. 30:2025, which could result in the assessment of a civil penalty in an amount of not more than fifty thousand dollars (\$50,000) for each day of continued violation or noncompliance.

VII.

For each violation described herein, the Department reserves the right to seek civil penalties in any manner allowed by law, and nothing herein shall be construed to preclude the right to seek such penalties.

## NOTICE OF POTENTIAL PENALTY

### I.

Pursuant to La. R.S. 30:2050.3(B), you are hereby notified that the issuance of a penalty assessment is being considered for the violation(s) described herein. Written comments may be filed regarding the violation(s) and the contemplated penalty. If you elect to submit comments, it is requested that they be submitted within ten (10) days of receipt of this notice.

### II.

Prior to the issuance of additional appropriate enforcement action(s), you may request a meeting with the Department to present any mitigating circumstances concerning the violation(s). If you would like to have such a meeting, please contact Naz Zanjani-Bachar at (225) 219-3774 within ten (10) days of receipt of this **NOTICE OF POTENTIAL PENALTY**.

### III.

The Department is required by La. R.S. 30:2025(E)(3)(a) to consider the gross revenues of the Respondent and the monetary benefits of noncompliance to determine whether a penalty will be assessed and the amount of such penalty. Please forward the Respondent's most current annual gross revenue statement along with a statement of the monetary benefits of noncompliance for the cited violation(s) to the above named contact person within ten (10) days of receipt of this **NOTICE OF POTENTIAL PENALTY**. Include with your statement of monetary benefits the method(s) you utilized to arrive at the sum. If you assert that no monetary benefits have been gained, you are to fully justify that statement.

IV.

This **CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY** is effective upon receipt.

Baton Rouge, Louisiana, this 24<sup>th</sup> day of September, 2008.



Peggy M. Hatch  
Assistant Secretary  
Office of Environmental Compliance

Copies of a request for a hearing and/or related correspondence should be sent to:

Louisiana Department of Environmental Quality  
Office of Environmental Compliance  
Enforcement Division  
P.O. Box 4312  
Baton Rouge, LA 70821-4312  
Attention: Gwendolyn Berthelot

**BOBBY JINDAL**  
GOVERNOR



**HAROLD LEGGETT, PH.D.**  
SECRETARY

**State of Louisiana**  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
OFFICE OF ENVIRONMENTAL COMPLIANCE

May 13, 2009

CERTIFIED MAIL (7004 2510 0005 5763 8641)  
RETURN RECEIPT REQUESTED

**LAKELAND PARK SEWERAGE ASSOCIATION**  
c/o John L. Henchy, Agent of Service  
Matchet, Verbois, Futrell & Henchy  
Wrenwood Blvd, Suite C  
Baton Rouge, LA 70809

**RE: COMPLIANCE ORDER**  
**ENFORCEMENT TRACKING NO. WE-C-09-0151**  
**AGENCY INTEREST NO. 18177**

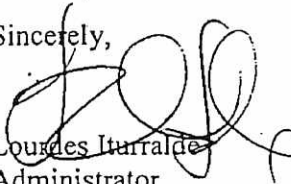
Dear Sir:

Pursuant to the Louisiana Environmental Quality Act (La. R.S. 30:2001, et seq.), the attached **COMPLIANCE ORDER** is hereby served on the **LAKELAND PARK SEWERAGE ASSOCIATION (RESPONDENT)** for the violations described therein.

Compliance is expected within the maximum time period established by each part of the **COMPLIANCE ORDER**. The violations cited in the **COMPLIANCE ORDER** could result in the issuance of a civil penalty or other appropriate legal actions.

Any questions concerning this action should be directed to Naz Zanjani-Bachar at (225) 219-3794.

Sincerely,

  
Lourdes Iturralde  
Administrator  
Enforcement Division

LI/NZB/nzb  
Alt ID No. LAU006172  
Attachment





c: Ms. Carol Peters-Wagnon  
U.S. Environmental Protection Agency, Region 6  
  
Chuck Methvien, Regional Sanitation Director

**STATE OF LOUISIANA  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
OFFICE OF ENVIRONMENTAL COMPLIANCE**

**IN THE MATTER OF**

**LAKELAND PARK SEWERAGE  
ASSOCIATION  
EAST BATON ROUGE PARISH  
ALT ID NO. LAU006172**

\*  
\*  
\* **ENFORCEMENT TRACKING NO.**  
\*  
\* **WE-C-09-0151**  
\*  
\* **AGENCY INTEREST NO.**

**PROCEEDINGS UNDER THE LOUISIANA  
ENVIRONMENTAL QUALITY ACT,  
La. R.S. 30:2001, ET SEQ.**

\* **18177**  
\*  
\*

**COMPLIANCE ORDER**

The following **COMPLIANCE ORDER** is issued to the **LAKELAND PARK SEWERAGE ASSOCIATION** by the Louisiana Department of Environmental Quality (the Department), under the authority granted by the Louisiana Environmental Quality Act (the Act), La. R.S. 30:2001, et seq., and particularly by La. R.S. 30:2025(C), 30:2050.2 and 30:2050.3(B).

**FINDINGS OF FACT**

**I.**

The Respondent owns and/or operates an existing sanitary sewage treatment facility which serves the Lakeland Park Sewerage Association located at 12021 Lakeland Park Blvd., in Baton Rouge, East Baton Rouge Parish, Louisiana. The Respondent was granted coverage under Louisiana Pollutant Discharge Elimination System (LPDES) General Permit LAG570000 on December 4, 1997 and was specifically assigned permit number LAG570036. The permit expired on September 30, 2002, and was administratively extended. The Respondent submitted a permit renewal application on July 2, 2004. LPDES permit LAG570036 was reissued to the Respondent on or about July 11, 2005. LPDES permit expired on March 14, 2009. The Respondent did not submit a Notice of Intent (NOI) as required by LPDES permit LAG570036. The Respondent does not have a Louisiana Pollutant Discharge Elimination System (LPDES)

permit or any other authority to discharge wastewater and/or other substances to waters of the state. The discharge of treated sanitary wastewater from Outfall 001 is into an unnamed ditch, thence into Clay Cut Bayou, thence into the Amite River, all waters of the state.

## II.

A file review conducted by the Department on or about May 8, 2009, revealed that the Respondent was operating without an LPDES permit from March 14, 2009, the date the LPDES permit LAG570036 expired, until present. The unauthorized discharge of wastewater from March 14, 2009, until present is a violation of La. R.S. 30:2075, La. R.S. 30:2076 (A)(1)(a), La. R.S. 30:2076 (A)(3), LAC 33:IX.501.A, LAC 33:IX.501.D, and LAC 33:IX.2311.A.1.

## III.

A file review conducted by the Department on or about May 8, 2009, revealed that the Respondent failed to apply for a permit. The failure to apply for a permit is a violation of La. R.S. 30:2076 (A) (1), LAC 33:IX.501.A, and LAC 33:IX.2331.A.1.

## IV.

A file review conducted by the Department on or about May 8, 2009, revealed the Respondent exceeded effluent limitations. These effluent exceedances, as reported by the Respondent on Discharge Monitoring Reports (DMRs), are summarized below:

Date	Parameter	Permit Limit	Reported Value
May 2008	TSS (mon avg)	15 mg/L	18 mg/L
July 2008	TSS (mon avg)	15 mg/L	125 mg/L
	TSS (wkly avg)	23 mg/L	125 mg/L
	Fecal Coliform (mon avg)	200 col/100 ml	>2,000 col/100 ml
	Fecal Coliform (wkly avg)	400 col/100 ml	>2,000 col/100 ml
August 2008	Fecal Coliform (mon avg)	200 col/100 ml	>2,000 col/100 ml
	Fecal Coliform (wkly avg)	400 col/100 ml	>2,000 col/100 ml
September 2008	BOD <sub>5</sub> (mon avg)	10 mg/L	29 mg/L
	BOD <sub>5</sub> (wkly avg)	15 mg/L	29 mg/L
	TSS (mon avg)	15 mg/L	27 mg/L
	TSS (wkly avg)	23 mg/L	27 mg/L
	Fecal Coliform (mon avg)	200 col/100 ml	>2,000 col/100 ml
	Fecal Coliform (wkly avg)	400 col/100 ml	>2,000 col/100 ml
October 2008	TSS (mon avg)	15 mg/L	17 mg/L
November 2008	BOD <sub>5</sub> (mon avg)	10 mg/L	12 mg/L



Date	Parameter	Permit Limit	Reported Value
December 2008	TSS (mon avg)	15 mg/L	44 mg/L
	TSS (wkly avg)	23 mg/L	44 mg/L
	Fecal Coliform (mon avg)	200 col/100 ml	>2,000 col/100 ml
	Fecal Coliform (wkly avg)	400 col/100 ml	>2,000 col/100 ml
January 2009	BOD <sub>5</sub> (mon avg)	10 mg/L	14 mg/L
	TSS (mon avg)	15 mg/L	35 mg/L
	TSS (wkly avg)	23 mg/L	35 mg/L
February 2009	BOD <sub>5</sub> (mon avg)	10 mg/L	48 mg/L
	BOD <sub>5</sub> (wkly avg)	15 mg/L	48 mg/L
	TSS (mon avg)	15 mg/L	24 mg/L
	TSS (wkly avg)	23 mg/L	24 mg/L

Each effluent excursion constitutes a violation of LPDES permit LAG570036 (Part I, Section B and Part III Section A.2), La. R.S. 30:2076(A)(1), La. R.S. 30:2076(A)(3), LAC 33:IX.501.A, LAC 33:IX.501.D, and LAC 33:IX.2701.A.

#### V.

A file review conducted on or about May 8, 2009, revealed that the Respondent failed to submit a Discharge Monitoring Report (DMR) for the monitoring period of June 2008. Each failure to submit DMRs is a violation of LPDES permit LAG570036 (Part II, Section N.7, and Part III, Sections A.2 and D.4), La. R.S. 30:2076 (A) (3), LAC 33:IX.501.A, LAC 33:IX.2701.A, and LAC 33:IX.2701.L.4.a.

### COMPLIANCE ORDER

Based on the foregoing, the Respondent is hereby ordered:

#### I.

To immediately cease, upon receipt of this **COMPLIANCE ORDER**, any unauthorized discharges from the Respondent's facility to waters of the state and to take any and all steps necessary to meet and maintain compliance with the Water Quality Regulations.

#### II.

To protect water quality, the Respondent is required to comply with the following:

- A) **If the Respondent chooses to discharge to waters of the state**, the following limitations shall apply:

The point of discharge is hereby designated as Outfall 001. The discharge from this facility's operation shall be monitored at the point of discharge from the last treatment unit prior to entering waters of the state of Louisiana. The Respondent shall monitor and

report all discharges from its facility under the effluent limitations and monitoring requirements, and comply with all terms and conditions described in its expired **LPDES permit LAG570036** until a final LPDES permit is re-issued by the Department or until Respondent is otherwise notified in writing by the Department.

Monitoring results for each month shall be summarized on a Discharge Monitoring Report (DMR) form and submitted to the Office of Environmental Compliance on a monthly basis, postmarked no later than the 15<sup>th</sup> day of the month following each reporting period. Please reference **WE-C-09-0151**, **AI# 18177**, and **LAU006172** until a final LPDES permit is re-issued by the Department.

**If the Respondent chooses to discharge to waters of the state**, a properly completed LPDES notice of intent or appropriate LPDES permit application must be submitted to the Department within thirty (30) days after receipt of this **COMPLIANCE ORDER**. The properly completed LPDES notice of intent or permit application must address all outfalls at the facility and must follow all procedures and guidelines set forth in LAC 33:IX.Chapter 25. If a properly completed LPDES notice of intent or permit application is not submitted within thirty (30) days after receipt of this **COMPLIANCE ORDER**, the following interim discharge limitations and monitoring requirements will be terminated and the Department may take additional enforcement action.

- B) **If the Respondent does not choose to discharge to waters of the state**, the Respondent shall, within thirty (30) days after receipt of this **COMPLIANCE ORDER**, provide written documentation to the Department that no activities exist at the Respondent's facility resulting in any unauthorized discharges to waters of the state.

### III.

To notify the Enforcement Division within fifteen (15) days of receipt of a final LPDES permit issued by the Department.

### IV.

To submit to the Enforcement Division, within thirty (30) days after receipt of this **COMPLIANCE ORDER**, a written report that includes a detailed description of the circumstances surrounding the cited violations and actions taken or to be taken to achieve compliance with the Order Portion of this **COMPLIANCE ORDER**. This report and all other reports or information required to be submitted to the Enforcement Division by this **COMPLIANCE ORDER** shall be submitted to:

Office of Environmental Compliance  
Post Office Box 4312  
Baton Rouge, Louisiana 70821-4312  
**Attention: Naz Zanjani-Bachar**  
**Enforcement Tracking No. WE-C-09-0151**  
**Agency Interest No. 18177**

**THE RESPONDENT SHALL FURTHER BE ON NOTICE THAT:**

I.

The Respondent has a right to an adjudicatory hearing on a disputed issue of material fact or of law arising from this **COMPLIANCE ORDER**. This right may be exercised by filing a written request with the Secretary no later than thirty (30) days after receipt of this **COMPLIANCE ORDER**.

II.

The request for an adjudicatory hearing shall specify the provisions of the **COMPLIANCE ORDER** on which the hearing is requested and shall briefly describe the basis for the request. This request should reference the **Enforcement Tracking Number** and **Agency Interest Number**, which are located in the upper right-hand corner of the first page of this document and should be directed to the following:

Department of Environmental Quality  
Office of the Secretary  
Post Office Box 4302  
Baton Rouge, Louisiana 70821-4302  
**Attn: Hearings Clerk, Legal Division**  
**Re: Enforcement Tracking No. WE-C-09-0151**  
**Agency Interest No. 18177**

III.

Upon the Respondent's timely filing a request for a hearing, a hearing on the disputed issue of material fact or of law regarding this **COMPLIANCE ORDER** may be scheduled by the Secretary of the Department. The hearing shall be governed by the Act, the Administrative Procedure Act (La. R.S. 49:950, et seq.), and the Department's Rules of Procedure. The Department may amend or supplement this **COMPLIANCE ORDER** prior to the hearing, after providing sufficient notice and an opportunity for the preparation of a defense for the hearing.



## IV.

This **COMPLIANCE ORDER** shall become a final enforcement action unless the request for hearing is timely filed. Failure to timely request a hearing constitutes a waiver of the Respondent's right to a hearing on a disputed issue of material fact or of law under Section 2050.4 of the Act for the violation(s) described herein.

## V.

The Respondent's failure to request a hearing or to file an appeal or the Respondent's withdrawal of a request for hearing on this **COMPLIANCE ORDER** shall not preclude the Respondent from contesting the findings of facts in any subsequent penalty action addressing the same violation(s), although the Respondent is estopped from objecting to this **COMPLIANCE ORDER** becoming a permanent part of its compliance history.

## VI.

Civil penalties of not more than twenty-seven thousand five hundred dollars (\$27,500) for each day of violation for the violation(s) described herein may be assessed. For violations which occurred on August 15, 2004, or after, civil penalties of not more than thirty-two thousand five hundred dollars (\$32,500) may be assessed for each day of violation. The Respondent's failure or refusal to comply with this **COMPLIANCE ORDER** and the provisions herein will subject the Respondent to possible enforcement procedures under La. R.S. 30:2025, which could result in the assessment of a civil penalty in an amount of not more than fifty thousand dollars (\$50,000) for each day of continued violation or noncompliance.

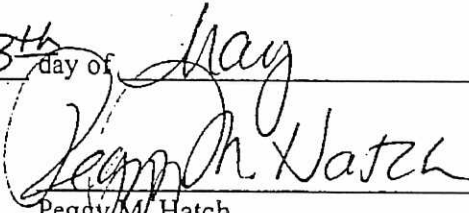
## VII.

For each violation described herein, the Department reserves the right to seek civil penalties in any manner allowed by law, and nothing herein shall be construed to preclude the right to seek such penalties.

VIII.

This **COMPLIANCE ORDER** is effective upon receipt.

Baton Rouge, Louisiana, this 13<sup>th</sup> day of May, 2009.



Peggy M. Hatch  
Assistant Secretary  
Office of Environmental Compliance

Copies of a request for a hearing and/or related correspondence should be sent to:

Louisiana Department of Environmental Quality  
Office of Environmental Compliance  
Enforcement Division  
P.O. Box 4312  
Baton Rouge, LA 70821-4312  
Attention: Naz Zanjani-Bachar

Table 1. Permit Limit Exceedances

Date	Outfall	Parameter	Permit Limit	Reported Value
7/2011	001	BOD, Monthly Average	10 mg/l	20 mg/l
		BOD, Weekly Average	15 mg/l	20 mg/l
		Fecal Coliform, Monthly Average	200 col/100 ml	1280 col/100 ml
		Fecal Coliform, weekly Average	400 col/100 ml	1280 col/100 ml
11/2011	001	BOD, Monthly Average	10 mg/l	16 mg/l
		BOD, Weekly Average	15 mg/l	16 mg/l
12/2011	001	BOD, Monthly Average	10 mg/l	22 mg/l
		BOD, Weekly Average	15 mg/l	22 mg/l
		TSS, Monthly Average	15 mg/l	16 mg/l
1/2012	001	BOD, Monthly Average	10 mg/l	14 mg/l
2/2012	001	BOD, Monthly Average	10 mg/l	14 mg/l
		TSS, Monthly Average	15 mg/l	17 mg/l
4/2012	001	BOD, Monthly Average	10 mg/l	14.0 mg/l
		TSS, Monthly Average	15 mg/l	21.0 mg/l
5/2012	001	BOD, Monthly Average	10 mg/l	22.0 mg/l
		BOD, Weekly Average	15 mg/l	22.0 mg/l
		Fecal Coliform, Monthly Average	200 col/100 ml	690 col/100 ml
		Fecal Coliform, weekly Average	400 col/100 ml	690 col/100 ml
6/2012	001	BOD, Monthly Average	10 mg/l	14.0 mg/l
7/2012	001	Fecal Coliform, Monthly Average	200 col/100 ml	500 col/100 ml
		Fecal Coliform, weekly Average	400 col/100 ml	500 col/100 ml
9/2012	001	BOD, Monthly Average	10 mg/l	26.0 mg/l
		BOD, Weekly Average	15 mg/l	26.0 mg/l
		Fecal Coliform, Monthly Average	200 col/100 ml	1570 col/100 ml
		Fecal Coliform, weekly Average	400 col/100 ml	1570 col/100 ml
10/2012	001	BOD, Monthly Average	10 mg/l	16.0 mg/l
		BOD, Weekly Average	15 mg/l	16.0 mg/l
		TSS, Monthly Average	15 mg/l	21.0 mg/l
11/2012	001	BOD, Monthly Average	10 mg/l	75.0 mg/l
		BOD, Weekly Average	15 mg/l	75.0 mg/l
		TSS, Monthly Average	15 mg/l	20.0 mg/l
		Fecal Coliform, Monthly Average	200 col/100 ml	1660 col/100 ml
		Fecal Coliform, weekly Average	400 col/100 ml	1660 col/100 ml
12/2012	001	BOD, Monthly Average	10 mg/l	27.0 mg/l
		BOD, Weekly Average	15 mg/l	27.0 mg/l
		TSS, Monthly Average	15 mg/l	40.0 mg/l
		TSS, Weekly Average	23 mg/l	40.0 mg/l
		Fecal Coliform, Monthly Average	200 col/100 ml	>2000 col/100 ml
		Fecal Coliform, weekly Average	400 col/100 ml	>2000 col/100 ml
1/2013	001	BOD, Monthly Average	10 mg/l	60.0 mg/l
		BOD, Weekly Average	15 mg/l	60.0 mg/l
		TSS, Monthly Average	15 mg/l	23.2 mg/l
		TSS, Weekly Average	23 mg/l	23.2 mg/l
2/2013	001	BOD, Monthly Average	10 mg/l	99.0 mg/l
		BOD, Weekly Average	15 mg/l	99.0 mg/l
		TSS, Monthly Average	15 mg/l	16.4 mg/l
3/2013	001	BOD, Monthly Average	10 mg/l	66.0 mg/l
		BOD, Weekly Average	15 mg/l	66.0 mg/l
		TSS, Monthly Average	15 mg/l	22.0 mg/l
		Fecal Coliform, Monthly Average	200 col/100 ml	>2000 col/100 ml
		Fecal Coliform, weekly Average	400 col/100 ml	>2000 col/100 ml
4/2013	001	BOD, Monthly Average	10 mg/l	19.0 mg/l
		BOD, Weekly Average	15 mg/l	19.0 mg/l
		TSS, Monthly Average	15 mg/l	28.4 mg/l
		TSS, Weekly Average	23 mg/l	28.4 mg/l
		Fecal Coliform, Monthly Average	200 col/100 ml	>2000 col/100 ml
		Fecal Coliform, weekly Average	400 col/100 ml	>2000 col/100 ml
5/2013	001	TSS, Monthly Average	15 mg/l	23.2 mg/l
		TSS, Weekly Average	23 mg/l	23.2 mg/l



Date	Outfall	Parameter	Permit Limit	Reported Value
5/2013	001	Fecal Coliform, Monthly Average	200 col/100 ml	>2000 col/100 ml
		Fecal Coliform, weekly Average	400 col/100 ml	>2000 col/100 ml
6/2013	001	BOD, Monthly Average	10 mg/l	70.1 mg/l
		BOD, Weekly Average	15 mg/l	70.1 mg/l
		TSS, Monthly Average	15 mg/l	27.6 mg/l
		TSS, Weekly Average	23 mg/l	27.6 mg/l
		Fecal Coliform, Monthly Average	200 col/100 ml	>2000 col/100 ml
		Fecal Coliform, weekly Average	400 col/100 ml	>2000 col/100 ml
7/2013	001	BOD, Monthly Average	10 mg/l	12.2 mg/l
		TSS, Monthly Average	15 mg/l	18.8 mg/l
		Fecal Coliform, Monthly Average	200 col/100 ml	>2000 col/100 ml
		Fecal Coliform, weekly Average	400 col/100 ml	>2000 col/100 ml
8/2013	001	TSS, Monthly Average	15 mg/l	26.0 mg/l
		TSS, Weekly Average	23 mg/l	26.0 mg/l
		Fecal Coliform, Monthly Average	200 col/100 ml	>2000 col/100 ml
		Fecal Coliform, weekly Average	400 col/100 ml	>2000 col/100 ml
9/2013	001	BOD, Monthly Average	10 mg/l	12.4 mg/l
		TSS, Monthly Average	15 mg/l	28.0 mg/l
		TSS, Weekly Average	23 mg/l	28.0 mg/l
		Fecal Coliform, Monthly Average	200 col/100 ml	>2000 col/100 ml
		Fecal Coliform, weekly Average	400 col/100 ml	>2000 col/100 ml
10/2013	001	BOD, Monthly Average	10 mg/l	12.5 mg/l
		TSS, Monthly Average	15 mg/l	22.0 mg/l
		Fecal Coliform, Monthly Average	200 col/100 ml	>2000 col/100 ml
		Fecal Coliform, weekly Average	400 col/100 ml	>2000 col/100 ml
11/2013	001	BOD, Monthly Average	10 mg/l	19.6 mg/l
		BOD, Weekly Average	15 mg/l	19.6 mg/l
		TSS, Monthly Average	15 mg/l	34.0 mg/l
		TSS, Weekly Average	23 mg/l	34.0 mg/l
12/2013	001	BOD, Monthly Average	10 mg/l	22.7 mg/l
		BOD, Weekly Average	15 mg/l	22.7 mg/l
		TSS, Monthly Average	15 mg/l	30.8 mg/l
		TSS, Weekly Average	23 mg/l	30.8 mg/l
1/2014	001	BOD, Monthly Average	10 mg/l	24.0 mg/l
		BOD, Weekly Average	15 mg/l	24.0 mg/l
		TSS, Monthly Average	15 mg/l	48.7 mg/l
		TSS, Weekly Average	23 mg/l	48.7 mg/l
2/2014	001	BOD, Monthly Average	10 mg/l	15.5 mg/l
		BOD, Weekly Average	15 mg/l	15.5 mg/l
		TSS, Monthly Average	15 mg/l	26.4 mg/l
		TSS, Weekly Average	23 mg/l	26.4 mg/l
3/2014	001	BOD, Monthly Average	10 mg/l	33.2 mg/l
		BOD, Weekly Average	15 mg/l	33.2 mg/l
		TSS, Monthly Average	15 mg/l	71.4 mg/l
		TSS, Weekly Average	23 mg/l	71.4 mg/l
4/2014	001	BOD, Monthly Average	10 mg/l	21.0 mg/l
		BOD, Weekly Average	15 mg/l	21.0 mg/l
		TSS, Monthly Average	15 mg/l	57.4 mg/l
		TSS, Weekly Average	23 mg/l	57.4 mg/l
5/2014	001	BOD, Monthly Average	10 mg/l	61.5 mg/l
		BOD, Weekly Average	15 mg/l	61.5 mg/l
6/2014	001	TSS, Monthly Average	15 mg/l	37.6 mg/l
		TSS, Weekly Average	23 mg/l	37.6 mg/l
7/2014	001	BOD, Monthly Average	10 mg/l	37.4 mg/l
		BOD, Weekly Average	15 mg/l	37.4 mg/l
		TSS, Monthly Average	15 mg/l	33.6 mg/l
		TSS, Weekly Average	23 mg/l	33.6 mg/l
8/2014	001	BOD, Monthly Average	10 mg/l	66.0 mg/l
		BOD, Weekly Average	15 mg/l	66.0 mg/l



Date	Outfall	Parameter	Permit Limit	Reported Value
8/2014	001	TSS, Monthly Average	15 mg/l	26.4 mg/l
		TSS, Weekly Average	23 mg/l	26.4 mg/l
9/2014	001	BOD, Monthly Average	10 mg/l	65.4 mg/l
		BOD, Weekly Average	15 mg/l	65.4 mg/l
		Fecal Coliform, Monthly Average	200 col/100 ml	>2000 col/100 ml
		Fecal Coliform, weekly Average	400 col/100 ml	>2000 col/100 ml
10/2014	001	BOD, Monthly Average	10 mg/l	85.8 mg/l
		BOD, Weekly Average	15 mg/l	85.8 mg/l
		TSS, Monthly Average	15 mg/l	22.0 mg/l
		Fecal Coliform, Monthly Average	200 col/100 ml	>2000 col/100 ml
		Fecal Coliform, weekly Average	400 col/100 ml	>2000 col/100 ml
11/2014	001	BOD, Monthly Average	10 mg/l	64.7 mg/l
		BOD, Weekly Average	15 mg/l	64.7 mg/l
		TSS, Monthly Average	15 mg/l	42.0 mg/l
		TSS, Weekly Average	23 mg/l	42.0 mg/l
		Fecal Coliform, Monthly Average	200 col/100 ml	>2000 col/100 ml
		Fecal Coliform, weekly Average	400 col/100 ml	>2000 col/100 ml
12/2014	001	BOD, Monthly Average	10 mg/l	67.7 mg/l
		BOD, Weekly Average	15 mg/l	67.7 mg/l
		TSS, Monthly Average	15 mg/l	20.8 mg/l
1/2015	001	BOD, Monthly Average	10 mg/l	65.7 mg/l
		BOD, Weekly Average	15 mg/l	65.7 mg/l
		TSS, Monthly Average	15 mg/l	39.1 mg/l
		TSS, Weekly Average	23 mg/l	39.1 mg/l
		Fecal Coliform, Monthly Average	200 col/100 ml	>2000 col/100 ml
		Fecal Coliform, weekly Average	400 col/100 ml	>2000 col/100 ml
2/2015	001	BOD, Monthly Average	10 mg/l	28.1 mg/l
		BOD, Weekly Average	15 mg/l	28.1 mg/l
		TSS, Monthly Average	15 mg/l	74.2 mg/l
		TSS, Weekly Average	23 mg/l	74.2 mg/l
		Fecal Coliform, Monthly Average	200 col/100 ml	>2000 col/100 ml
		Fecal Coliform, weekly Average	400 col/100 ml	>2000 col/100 ml
3/2015	001	BOD, Monthly Average	10 mg/l	>90.6 mg/l
		BOD, Weekly Average	15 mg/l	>90.6 mg/l
		TSS, Monthly Average	15 mg/l	42.0 mg/l
		TSS, Weekly Average	23 mg/l	42.0 mg/l
		Fecal Coliform, Monthly Average	200 col/100 ml	>2000 col/100 ml
		Fecal Coliform, weekly Average	400 col/100 ml	>2000 col/100 ml
4/2015	001	BOD, Monthly Average	10 mg/l	52.8 mg/l
		BOD, Weekly Average	15 mg/l	52.8 mg/l
		TSS, Monthly Average	15 mg/l	33.2 mg/l
		TSS, Weekly Average	23 mg/l	33.2 mg/l
		Fecal Coliform, Monthly Average	200 col/100 ml	>2000 col/100 ml
		Fecal Coliform, weekly Average	400 col/100 ml	>2000 col/100 ml
5/2015	001	BOD, Weekly Average	15 mg/l	13.0 mg/l
		TSS, Monthly Average	15 mg/l	29.6 mg/l
		TSS, Weekly Average	23 mg/l	29.6 mg/l
		Fecal Coliform, Monthly Average	200 col/100 ml	>2000 col/100 ml
		Fecal Coliform, weekly Average	400 col/100 ml	>2000 col/100 ml
6/2015	001	BOD, Weekly Average	15 mg/l	13.5 mg/l
		TSS, Monthly Average	15 mg/l	23.6 mg/l
		TSS, Weekly Average	23 mg/l	23.6 mg/l
		Fecal Coliform, Monthly Average	200 col/100 ml	>2000 col/100 ml
6/2015	001	Fecal Coliform, weekly Average	400 col/100 ml	>2000 col/100 ml
7/2015	001	BOD, Monthly Average	10 mg/l	32.4 mg/l
		BOD, Weekly Average	15 mg/l	32.4 mg/l
		TSS, Monthly Average	15 mg/l	28.0 mg/l
		TSS, Weekly Average	23 mg/l	28.0 mg/l
		Fecal Coliform, Monthly Average	200 col/100 ml	>2000 col/100 ml
		Fecal Coliform, weekly Average	400 col/100 ml	>2000 col/100 ml



Date	Outfall	Parameter	Permit Limit	Reported Value
8/2015	001	BOD, Monthly Average	10 mg/l	58.4 mg/l
		BOD, Weekly Average	15 mg/l	58.4 mg/l
		TSS, Monthly Average	15 mg/l	92.0 mg/l
		TSS, Weekly Average	23 mg/l	92.0 mg/l
		Fecal Coliform, Monthly Average	200 col/100 ml	>2000 col/100 ml
		Fecal Coliform, weekly Average	400 col/100 ml	>2000 col/100 ml
9/2015	001	TSS, Monthly Average	15 mg/l	28.4 mg/l
		TSS, Weekly Average	23 mg/l	28.4 mg/l
		Fecal Coliform, Monthly Average	200 col/100 ml	>2000 col/100 ml
		Fecal Coliform, weekly Average	400 col/100 ml	>2000 col/100 ml
10/2015	001	TSS, Monthly Average	15 mg/l	26.4 mg/l
		TSS, Weekly Average	23 mg/l	26.4 mg/l
11/2015	001	BOD, Monthly Average	10 mg/l	24.2 mg/l
		BOD, Weekly Average	15 mg/l	24.2 mg/l
		TSS, Monthly Average	15 mg/l	20.0 mg/l
1/2016	001	BOD, Monthly Average	10 mg/l	50.6 mg/l
		BOD, Weekly Average	15 mg/l	50.6 mg/l
		TSS, Monthly Average	15 mg/l	45.2 mg/l
		TSS, Weekly Average	23 mg/l	45.2 mg/l
2/2016	001	BOD, Monthly Average	10 mg/l	19.4 mg/l
		BOD, Weekly Average	15 mg/l	19.4 mg/l
		Fecal Coliform, Monthly Average	200 col/100 ml	>2000 col/100 ml
		Fecal Coliform, weekly Average	400 col/100 ml	>2000 col/100 ml
3/2016	001	BOD, Monthly Average	10 mg/l	15.1 mg/l
		BOD, Weekly Average	15 mg/l	15.1 mg/l
		TSS, Monthly Average	15 mg/l	34.0 mg/l
		TSS, Weekly Average	23 mg/l	34.0 mg/l
4/2016	001	BOD, Monthly Average	10 mg/l	20.8 mg/l
		BOD, Weekly Average	15 mg/l	20.8 mg/l
		TSS, Monthly Average	15 mg/l	30.4 mg/l
		TSS, Weekly Average	23 mg/l	30.4 mg/l
5/2016	001	BOD, Monthly Average	10 mg/l	11.3 mg/l
		TSS, Monthly Average	15 mg/l	21.6 mg/l
6/2016	001	TSS, Monthly Average	15 mg/l	26.0 mg/l
		TSS, Weekly Average	23 mg/l	26.0 mg/l
		Fecal Coliform, Monthly Average	200 col/100 ml	>2000 col/100 ml
		Fecal Coliform, weekly Average	400 col/100 ml	>2000 col/100 ml
7/2016	001	TSS, Monthly Average	15 mg/l	24.8 mg/l
		TSS, Weekly Average	23 mg/l	24.8 mg/l
		Fecal Coliform, Monthly Average	200 col/100 ml	>2000 col/100 ml
		Fecal Coliform, weekly Average	400 col/100 ml	>2000 col/100 ml
8/2016	001	BOD, Monthly Average	10 mg/l	72.2 mg/l
		BOD, Weekly Average	15 mg/l	72.2 mg/l
		Fecal Coliform, Monthly Average	200 col/100 ml	>2000 col/100 ml
		Fecal Coliform, weekly Average	400 col/100 ml	>2000 col/100 ml
9/2016	001	Fecal Coliform, Monthly Average	200 col/100 ml	>2000 col/100 ml
		Fecal Coliform, weekly Average	400 col/100 ml	>2000 col/100 ml
10/2016	001	BOD, Monthly Average	10 mg/l	42.2 mg/l
		BOD, Weekly Average	15 mg/l	42.2 mg/l
		TSS, Monthly Average	15 mg/l	36.8 mg/l
		TSS, Weekly Average	23 mg/l	36.8 mg/l
		Fecal Coliform, Monthly Average	200 col/100 ml	>2000 col/100 ml
		Fecal Coliform, weekly Average	400 col/100 ml	>2000 col/100 ml
11/2016	001	BOD, Monthly Average	10 mg/l	19.4 mg/l
		BOD, Weekly Average	15 mg/l	19.4 mg/l
		TSS, Monthly Average	15 mg/l	30.0 mg/l
		TSS, Weekly Average	23 mg/l	30.0 mg/l
		Fecal Coliform, Monthly Average	200 col/100 ml	>2000 col/100 ml
		Fecal Coliform, weekly Average	400 col/100 ml	>2000 col/100 ml
12/2016	001	BOD, Monthly Average	10 mg/l	18.5 mg/l



		BOD, Weekly Average	15 mg/l	18.5 mg/l
		TSS, Monthly Average	15 mg/l	37.6 mg/l
		TSS, Weekly Average	23 mg/l	37.6 mg/l
		Fecal Coliform, Monthly Average	200 col/100 ml	>2000 col/100 ml
		Fecal Coliform, weekly Average	400 col/100 ml	>2000 col/100 ml
02/2017	001	BOD, Monthly Average	10 mg/l	13.4 mg/l
		TSS, Monthly Average	15 mg/l	23.2 mg/l
		TSS, Weekly Average	23 mg/l	23.2 mg/l
		Fecal Coliform, Monthly Average	200 col/100 ml	>2000 col/100 ml
		Fecal Coliform, weekly Average	400 col/100 ml	>2000 col/100 ml
03/2017	001	BOD, Monthly Average	10 mg/l	>102 mg/l
		BOD, Weekly Average	15 mg/l	>102 mg/l
		TSS, Monthly Average	15 mg/l	28.3 mg/l
		TSS, Weekly Average	23 mg/l	28.3 mg/l
		Fecal Coliform, Monthly Average	200 col/100 ml	>2000 col/100 ml
		Fecal Coliform, weekly Average	400 col/100 ml	>2000 col/100 ml
04/2017	001	TSS, Monthly Average	15 mg/l	16.4 mg/l
05/2017	001	TSS, Monthly Average	15 mg/l	19.6 mg/l
06/2017	001	BOD, Monthly Average	10 mg/l	15.1 mg/l
		BOD, Weekly Average	15 mg/l	15.1 mg/l
		Fecal Coliform, Monthly Average	200 col/100 ml	>2000 col/100 ml
		Fecal Coliform, weekly Average	400 col/100 ml	>2000 col/100 ml
		TSS, Monthly Average	15 mg/l	19.6 mg/l
07/2017	001	BOD, Monthly Average	10 mg/l	20.4 mg/l
		BOD, Weekly Average	15 mg/l	20.4 mg/l
		TSS, Monthly Average	15 mg/l	18 mg/l
09/2017	001	BOD, Monthly Average	10 mg/l	15.8 mg/l
		BOD, Weekly Average	15 mg/l	15.8 mg/l