

STATE OF LOUISIANA

DEPARTMENT OF ENVIRONMENTAL QUALITY

IN THE MATTER OF:

PILGRIM'S PRIDE CORPORATION

AI # 27951

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

\* Settlement Tracking No.  
\* SA-WE-20-0001  
\*  
\* Enforcement Tracking No.  
\* WE-CN-17-01161A  
\*  
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\*  
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SETTLEMENT

The following Settlement is hereby agreed to between Pilgrim's Pride Corporation ("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 corporation that owns and/or operates a poultry processing plant located in Natchitoches, Natchitoches Parish, Louisiana ("the Facility").

II

On January 17, 2019, the Department issued to Respondent an Amended Consolidated Compliance Order & Notice of Potential Penalty, Enforcement No. WE-CN-17-01161A (Exhibit 1).

III

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

The Respondent failed to comply with LPDES Permit LA0054178. Specifically, a review of Discharge Monitoring Reports (DMRs) between January 2019 and June 2019, revealed that the Respondent reported exceedances of permit effluent limitations for Whole Effluent Toxicity, Fecal coliform and Total Nitrogen as follows:

MP End Date	Outfall	Parameter	Limit	DMR Value	Units
03/31/2019	001-A	Coliform, fecal general --- DAILY MX	400	>600	#/100mL
03/31/2019	001-CE	Whole Effluent Toxicity [WET] - C. dubia --- 7 DA MIN	94	0	%
03/31/2019	001-CE	Whole Effluent Toxicity [WET] - C. dubia --- MO AV MN	94	0	%
06/30/2019	001-A	Nitrogen, total [as N] --- MO AVG	103	110.2	mg/L
06/30/2019	001-CE	Whole Effluent Toxicity [WET] - C. dubia --- 7 DA MIN	94	53	%
06/30/2019	001-CE	Whole Effluent Toxicity [WET] - C. dubia --- MO AV MN	94	53	%

Each exceedance of a permit effluent limitation is a violation of LPDES Permit # LA0054178 (Effluent Limitations and Monitoring Requirements, pgs. 1 and 2 of 7), La. R.S. 30:2076(A)(3), and LAC 33:IX.501.A.

#### 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 SEVEN THOUSAND FIVE HUNDRED FIFTY AND NO/100 DOLLARS (\$7,550.00), of which Seven Hundred Seventy-Three and 30/100 Dollars (\$773.30) represents the Department's enforcement costs, in settlement of the claims set forth in this agreement.

## VI

Respondent further agrees that the Department may consider the inspection report(s), permit record(s), the Amended Consolidated Compliance Order & Notice of Potential Penalty, additional violations, 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 Natchitoches, 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.

**PILGRIM'S PRIDE CORPORATION**

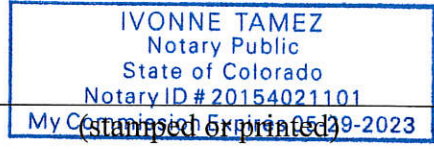
BY: [Signature]  
(Signature)

Fabio Sandri  
(Printed)

TITLE: CEO

THUS DONE AND SIGNED in duplicate original before me this 11<sup>th</sup> day of November, 20 20, at Pilgrim's Pride Corporation

[Signature]  
NOTARY PUBLIC (ID # 20154021101)

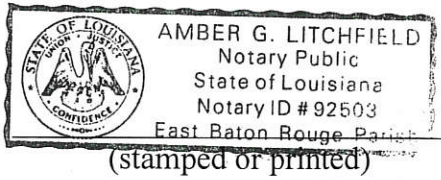


**LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY**  
Chuck Carr Brown, Ph.D., Secretary

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

THUS DONE AND SIGNED in duplicate original before me this 1<sup>st</sup> day of February, 20 21, at Baton Rouge, Louisiana.


[Signature]  
NOTARY PUBLIC (ID # 92503)



Approved: [Signature]  
\_\_\_\_\_  
Loures Iturralde, Assistant Secretary

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY  
 OFFICE OF ENVIRONMENTAL COMPLIANCE  
 ENFORCEMENT DIVISION  
 POST OFFICE BOX 4312  
 BATON ROUGE, LOUISIANA 70821-4312

AMENDED  
 CONSOLIDATED COMPLIANCE ORDER &  
 NOTICE OF POTENTIAL PENALTY



Enforcement Tracking No.	WE-CN-17-01161A	Certified Mail No.	7016 2140 0000 5132 9045
Agency Interest (AI) No.	27951	Contact Name	Scott B. Pierce
Alternate ID No.	LA0054178	Contact Phone No.	(225) 219-3723
Respondent:	PILGRIM'S PRIDE CORPORATION (DELAWARE)	Facility Name:	Natchitoches Processing Plant
	c/o Corporation Service Company Agent for Service of Process	Physical Location:	7088 Highway 1 South Bypass
	501 Louisiana Avenue	City, State, Zip:	Natchitoches, LA 71458
	Baton Rouge, LA 70802	Parish:	Natchitoches

This AMENDED CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY is issued 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). This AMENDED CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY replaces CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY, ENFORCEMENT TRACKING NO. WE-CN-17-01161 issued on February 27, 2018 in its entirety.

**FINDINGS OF FACT**

An authorized representative of the Department inspected the abovementioned facility or conducted a file review of the facility to determine the degree of compliance with regulations promulgated in the Louisiana Administrative Code, Title 33. The State regulatory citations for the violation(s) identified during the inspection and/or file review are indicated below.

I.	The Respondent owns and/or operates a poultry processing plant located at 7088 Highway 1 South Bypass, Natchitoches, Natchitoches Parish, Louisiana. The Respondent was issued Louisiana Pollutant Discharge Elimination System (LPDES) Permit LA0054178 on May 28, 2014, with an effective date of July 1, 2014. LPDES Permit LA0054178 will expire on June 30, 2019. Under the terms and conditions of LPDES Permit LA0054178, the Respondent is permitted to discharge process wastewater, boiler blowdown, cooling tower blowdown, and storm water runoff into Old River, all waters of the state.
	<b>Date of Violation</b>   <b>Description of Violation</b>
II.	Inspection(s) & File Review: 1/22/18, 9/19/18, 10/29/18. The Respondent failed to comply with LPDES Permit LA0054178. Specifically, between March 2017 and December 2018, the Respondent reported exceedances of permit effluent limitations for Whole Effluent Toxicity, BOD, Ammonia, TSS, and Total Nitrogen. See Attachment A (LPDES Permit # LA0054178 (Effluent Limitations and Monitoring Requirements, pgs. 1 and 2 of 7), La. R.S. 30:2076(A)(3), and LAC 33:IX.501.A)
III.	Inspection(s): 9/19/18. The Respondent failed to comply with LPDES Permit LA0054178. Specifically, LPDES Permit LA0054178 requires a continuous recorder to measure effluent flow. The Respondent's outfall 001 meter read +33.7% of actual flow. The Respondent's effluent flow meter is allowed a deviation of +/-10% of actual flow. (LPDES Permit # LA0054178 (Effluent Limitations and Monitoring Requirements, pg. 1 of 7, and Standard Conditions, Section C.6), La. R.S. 30:2076(A)(3), and LAC 33:IX.501.A)
IV.	Inspection(s): 9/19/18. The Respondent failed to comply with LPDES Permit LA0054178. Specifically, the Respondent failed to properly preserve the effluent sample. The facility's lab refrigerator read 10 degrees C and effluent compliance samples from outfall 001 were being stored inside the refrigerator. The required preservation of permit effluent samples, except fecal coliform, is 6 degrees C or less. (LPDES Permit # LA0054178 (Standard Conditions, Section C.5.a), La. R.S. 30:2076(A)(3), and LAC 33:IX.501.A)

**ORDER**

Based on the foregoing, the Respondent is hereby ordered to comply with the requirements that are indicated below:

I.	To take, immediately upon receipt of this COMPLIANCE ORDER, any and all steps necessary to meet and maintain compliance with the Water Quality Regulations. This shall include, but not be limited to, correcting all of the violations described in the "Findings of Fact" portion.
II.	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 violation(s) 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 the Department at the address specified in this document.

**RIGHT TO APPEAL**

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 left-hand corner of the first page of this document and should be directed to the address specified in this document.
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 Division of Administrative Law's (DAL) Procedural Rules. 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 <b>COMPLIANCE ORDER</b> 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 <b>COMPLIANCE ORDER</b> becoming a permanent part of its compliance history.
VI.	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 <b>COMPLIANCE ORDER</b> 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 Scott B. Pierce at (225) 219-3723 within ten (10) days of receipt of this <b>NOTICE OF POTENTIAL PENALTY</b> .
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 <b>NOTICE OF POTENTIAL PENALTY</b> . 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. If the Respondent chooses not to submit the requested most current annual gross revenues statement within ten (10) days, it will be viewed by the Department as an admission that the Respondent has the ability to pay the statutory maximum penalty as outlined in La. R.S. 30:2025.
IV.	This <b>CONSOLIDATED COMPLIANCE ORDER &amp; NOTICE OF POTENTIAL PENALTY</b> is effective upon receipt.


**CONTACTS AND SUBMITTAL OF INFORMATION**

<b>Enforcement Division:</b> Louisiana Department of Environmental Quality Office of Environmental Compliance Water Enforcement Division Post Office Box 4312 Baton Rouge, LA 70821 Attn: Scott B. Pierce	<b>Hearing Requests:</b> 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-17-01161A Agency Interest No. 27951
<b>Water Permits Division (if necessary):</b> Department of Environmental Quality Office of Environmental Services Post Office Box 4313 Baton Rouge, LA 70821-4313 Attn: Water Permits Division	<b>Physical Address (if hand delivered):</b> Department of Environmental Quality 602 N Fifth Street Baton Rouge, LA 70802

**HOW TO REQUEST CLOSURE OF THIS AMENDED CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY**

- To appeal the **AMENDED CONSOLIDATED COMPLIANCE ORDER AND NOTICE OF POTENTIAL PENALTY**, the Respondent must follow the guidelines set forth in the "Right to Appeal" portion of this **AMENDED CONSOLIDATED COMPLIANCE ORDER AND NOTICE OF POTENTIAL PENALTY**.
- To request closure of the **COMPLIANCE ORDER** portion, the Respondent must demonstrate compliance with the "Order" portion of this **AMENDED COMPLIANCE ORDER** by completing the attached "**AMENDED CONSOLIDATED COMPLIANCE ORDER AND NOTICE OF POTENTIAL PENALTY REQUEST TO CLOSE**" form and returning it to the address specified.
  - Before requesting closure of this **COMPLIANCE ORDER** portion, please contact the Financial Services Division at 225-219-3865 or email them at [\\_DEQ-WWWFinancialServices@la.gov](mailto:_DEQ-WWWFinancialServices@la.gov) to determine if you owe outstanding fees.
- To expedite closure of the **NOTICE OF POTENTIAL PENALTY** portion, the Respondent may offer a settlement amount to resolve any claim for civil penalties for the violation(s) described herein.
  - The Department assesses civil penalties based on LAC 33:1.Subpart1.Chapter7.
  - The Respondent may offer a settlement amount but the Department is under no obligation to enter into settlement negotiations. It is decided upon on a discretionary basis.
  - The settlement offer amount may be entered on the attached "**AMENDED CONSOLIDATED COMPLIANCE ORDER AND NOTICE OF POTENTIAL PENALTY REQUEST TO CLOSE**" form. The Respondent must include a justification of the offer.
  - **DO NOT** submit payment of the offer amount with the form. The Department will review the settlement offer and notify the Respondent as to whether the offer is or is not accepted.
  - Before requesting closure of the **NOTICE OF POTENTIAL PENALTY** portion, please contact the Financial Services Division at 225-219-3865 or email them at [\\_DEQ-WWWFinancialServices@la.gov](mailto:_DEQ-WWWFinancialServices@la.gov) to determine if you owe outstanding fees.

ou have questions or need more information, you may contact Scott B. Pierce at (225) 219-3723 or [scott.pierce@la.gov](mailto:scott.pierce@la.gov).

  
\_\_\_\_\_  
**Lourdes Iturraide**  
**Assistant Secretary**  
**Office of Environmental Compliance**

Date: 1-17-19

**Attachment(s)**

- Request to Close
- Attachment A



LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

OFFICE OF ENVIRONMENTAL COMPLIANCE

AMENDED

ENFORCEMENT DIVISION

CONSOLIDATED COMPLIANCE ORDER &

POST OFFICE BOX 4312

NOTICE OF POTENTIAL PENALTY

BATON ROUGE, LOUISIANA 70821-4312

REQUEST TO CLOSE



Enforcement Tracking No.	WE-CN-17-01161A	Contact Name	Scott B. Pierce
Agency Interest (AI) No.	27951	Contact Phone No.	(225) 219-3723
Alternate ID No.	LA0054178		
Respondent:	<b>PILGRIM'S PRIDE CORPORATION (DELAWARE)</b>	Facility Name:	Natchitoches Processing Plant
	c/o Corporation Service Company	Physical Location:	7088 Highway 1 South Bypass
	Agent for Service of Process	City, State, Zip:	Natchitoches, LA 71458
	501 Louisiana Avenue Baton Rouge, LA 70802	Parish:	Natchitoches

**STATEMENT OF COMPLIANCE**

STATEMENT OF COMPLIANCE	Date Completed	Copy Attached?
A written report was submitted in accordance with Paragraphs II, III, and IV of the "Order" portion of the <b>AMENDED COMPLIANCE ORDER</b> .		
All items in the "Findings of Fact" portion of the <b>COMPLIANCE ORDER</b> were addressed and the facility is being operated to meet and maintain the requirements of the "Order" portion of the <b>COMPLIANCE ORDER</b> . Final compliance was achieved as of:		

**SETTLEMENT OFFER (OPTIONAL)**

(check the applicable option)

<input type="checkbox"/>	The Respondent is not interested in entering into settlement negotiations with the Department with the understanding that the Department has the right to assess civil penalties based on LAC 33:1 Subpart 1, Chapter 7.
<input type="checkbox"/>	In order to resolve any claim for civil penalties for the violations in <b>NOTICE OF POTENTIAL PENALTY</b> («Tracking_»), the Respondent is interested in entering into settlement negotiations with the Department and would like to set up a meeting to discuss settlement procedures.
<input type="checkbox"/>	In order to resolve any claim for civil penalties for the violations in <b>NOTICE OF POTENTIAL PENALTY</b> («Tracking_»), the Respondent is interested in entering into settlement negotiations with the Department and offers to pay \$ _____ which shall include LDEQ enforcement costs and any monetary benefit of non-compliance. <ul style="list-style-type: none"> <li>• Monetary component = \$ _____</li> <li>• Beneficial Environmental Project (BEP) component (optional) = \$ _____</li> <li>• <b>DO NOT SUBMIT PAYMENT OF THE OFFER WITH THIS FORM-</b> the Department will review the settlement offer and notify the Respondent as to whether the offer is or is not accepted.</li> </ul>
<input type="checkbox"/>	The Respondent has reviewed the violations noted in <b>NOTICE OF POTENTIAL PENALTY</b> (WE-CN-17-01161A) and has attached a justification of its offer and a description of any BEPs if included in settlement offer.

**CERTIFICATION STATEMENT**

*I certify, under provisions in Louisiana and United States law that provide criminal penalties for false statements, that based on information and belief formed after reasonable inquiry, the statements and information attached and the compliance statement above, are true, accurate, and complete. I also certify that I do not owe outstanding fees or penalties to the Department for this facility or any other facility I own or operate. I further certify that I am either the Respondent or an authorized representative of the Respondent.*

Respondent's Signature	Respondent's Printed Name	Respondent's Title
Respondent's Physical Address	Respondent's Phone #	Date

**MAIL COMPLETED DOCUMENT TO THE ADDRESS BELOW:**

Louisiana Department of Environmental Quality  
 Office of Environmental Compliance  
 Enforcement Division  
 Post Office Box 4312  
 Baton Rouge, LA 70821  
 Attn: Scott B. Pierce

If you have questions or need more information, you may contact Scott B. Pierce at (225) 219-3723 or scott.pierce@la.gov.

Pilgrims Pride Corporation- Natchitoches Processing Plant-LA0054178

ATTACHMENT A

MIP End Date	Ordnal	Parameter	Limit	DMR Value	Units
03/31/2017	001-A	BOD, 5-day, 20 deg. C -- DAILY MX	15	15.9	mg/L
08/31/2017	001-A	Ammonia [as N] + unionized ammonia -- MO AVG	47	112.7	lb/d *
08/31/2017	001-A	Ammonia [as N] + unionized ammonia -- DAILY MX	93	446.8	lb/d *
08/31/2017	001-A	Ammonia [as N] + unionized ammonia -- MO AVG	4	10.3	mg/L *
08/31/2017	001-A	Ammonia [as N] + unionized ammonia -- DAILY MX	8	38.6	mg/L *
09/30/2017	001-A	BOD, 5-day, 20 deg. C -- MO AVG	117	124.5	lb/d *
09/30/2017	001-A	BOD, 5-day, 20 deg. C -- MO AVG	10	13.3	mg/L *
09/30/2017	001-A	BOD, 5-day, 20 deg. C -- DAILY MX	15	16.8	mg/L *
09/30/2017	001-A	Solids, total suspended -- MO AVG	234	316	lb/d *
09/30/2017	001-A	Solids, total suspended -- DAILY MX	350	693.8	lb/d *
09/30/2017	001-A	Solids, total suspended -- MO AVG	20	32.8	mg/L *
09/30/2017	001-A	Solids, total suspended -- DAILY MX	30	68	mg/L *
09/30/2017	001-A	Ammonia [as N] + unionized ammonia -- MO AVG	47	243	lb/d *
09/30/2017	001-A	Ammonia [as N] + unionized ammonia -- DAILY MX	93	598.9	lb/d *
09/30/2017	001-A	Ammonia [as N] + unionized ammonia -- MO AVG	4	24.9	mg/L *
09/30/2017	001-A	Ammonia [as N] + unionized ammonia -- DAILY MX	8	58.7	mg/L *
09/30/2017	001-CE	Whole Effluent Toxicity [WET] - C. dubia -- 7 DA MIN	94	0	% *
09/30/2017	001-CE	Whole Effluent Toxicity [WET] - C. dubia -- MO AV MN	94	0	% *
10/31/2017	001-A	BOD, 5-day, 20 deg. C -- DAILY MX	15	16.2	mg/L *
11/30/2017	001-A	Nitrogen, total [as N] -- MO AVG	103	113	mg/L
11/30/2017	001-A	Nitrogen, total [as N] -- DAILY MX	147	178	mg/L
12/31/2017	001-CE	Whole Effluent Toxicity [WET] - C. dubia -- 7 DA MIN	94	40	%
12/31/2017	001-CE	Whole Effluent Toxicity [WET] - C. dubia -- MO AV MN	94	40	%
01/31/2018	001-A	Solids, total suspended -- DAILY MX	350	374.8	lb/d
01/31/2018	001-A	Solids, total suspended -- DAILY MX	30	45	mg/L
03/31/2018	001-CE	Whole Effluent Toxicity [WET] - C. dubia -- 7 DA MIN	94	0	%
03/31/2018	001-CE	Whole Effluent Toxicity [WET] - C. dubia -- MO AV MN	94	0	%
07/31/2018	001-A	pH -- INST MIN	6	5.6	SU
08/31/2018	001-A	BOD, 5-day, 20 deg. C -- DAILY MX	15	16	mg/L
08/31/2018	001-A	Ammonia [as N] + unionized ammonia -- MO AVG	47	56.5	lb/d
08/31/2018	001-A	Ammonia [as N] + unionized ammonia -- DAILY MX	93	108.7	lb/d
08/31/2018	001-A	Ammonia [as N] + unionized ammonia -- MO AVG	4	7.3	mg/L
08/31/2018	001-A	Ammonia [as N] + unionized ammonia -- DAILY MX	8	14.2	mg/L
09/30/2018	001-A	Nitrogen, total [as N] -- MO AVG	103	123.8	mg/L
09/30/2018	001-CE	Whole Effluent Toxicity [WET] - C. dubia -- 7 DA MIN	94	0	%
09/30/2018	001-CE	Whole Effluent Toxicity [WET] - C. dubia -- MO AV MN	94	0	%
10/31/2018	001-A	Nitrogen, total [as N] -- MO AVG	103	114.2	mg/L
12/31/2018	001-CE	Whole Effluent Toxicity [WET] - C. dubia -- 7 DA MIN	94	0	%
12/31/2018	001-CE	Whole Effluent Toxicity [WET] - C. dubia -- MO AV MN	94	0	%

\* exceedance due to Hurricane Harvey