

STATE OF LOUISIANA

DEPARTMENT OF ENVIRONMENTAL QUALITY

IN THE MATTER OF:

RIVERSIDE FOOD DISTRIBUTORS, LLC

AI # 18632

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

\* Settlement Tracking No.  
\* SA-WE-20-0072  
\*  
\* Enforcement Tracking No.  
\* WE-CN-18-00392  
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SETTLEMENT

The following Settlement is hereby agreed to between Riverside Food Distributors, LLC (“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 limited liability company that owns and/or operates a food distribution facility located in Marrero, Jefferson Parish, Louisiana (“the Facility”).

II

On March 8, 2019, the Department issued to Respondent a Consolidated Compliance Order & Notice of Potential Penalty, Enforcement No. WE-CN-18-00392 (Exhibit 1).

III

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

IV

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 AND NO/100 DOLLARS (\$17,000.00), of which Five Hundred Fifty-Two and 36/100 Dollars (\$552.36) 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).

V

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

VI

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.

VII

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.

## VIII

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.

## IX

The Respondent has caused a public notice advertisement to be placed in the official journal of the parish governing authority in Jefferson 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.

## X

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).

## XI

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

## XII

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.

**RIVERSIDE FOOD DISTRIBUTORS, LLC**

BY: [Signature]  
(Signature)

Nicholas Christiano  
(Printed)

TITLE: General Manager

THUS DONE AND SIGNED in duplicate original before me this 29 day of JANUARY, 20 21, at GREYNA, LOUISIANA.



KEITH L. MAGNESS (29962)  
Notary Public, Bar No. 29962  
State of Louisiana  
My Commission is issued for Life

(stamped or printed)

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


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

THUS DONE AND SIGNED in duplicate original before me this 25<sup>th</sup> day of March, 20 21, at Baton Rouge, Louisiana.

AMBER G. LITCHELD (92503)  
Notary Public  
State of Louisiana  
Notary ID # 92503  
East Baton Rouge Parish

(stamped or printed)

Approved: [Signature]  
Lourdes Iturralde, Assistant Secretary

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY OFFICE OF ENVIRONMENTAL COMPLIANCE ENFORCEMENT DIVISION POST OFFICE BOX 4312 BATON ROUGE, LOUISIANA 70821-4312		<b>CONSOLIDATED COMPLIANCE ORDER &amp;                  NOTICE OF POTENTIAL PENALTY</b>		
Enforcement Tracking No.	WE-CN-18-00392	Certified Mail No.	7017 0530 0000 5978 7292	
Agency Interest (AI) No.	18632	Contact Name	Kevin Foy	
Alternate ID No.	LA0083216	Contact Phone No.	(225) 219-3485	
Respondent:	Riverside Food Distributors, LLC	Facility Name:	F. Christiana and Company	
	c/o C T Corporation System	Physical Location:	7251 River Road	
	Agent for Service of Process	City, State, Zip:	Marrero, LA 70073	
	3867 Plaza Tower Dr Baton Rouge, LA 70816	Parish:	Jefferson Parish	
This <b>CONSOLIDATED COMPLIANCE ORDER &amp; NOTICE OF POTENTIAL PENALTY</b> 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).				
<b>FINDINGS OF FACT</b>				
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 food distribution facility located at 7251 River Road, Marrero, Jefferson Parish, Louisiana. The Respondent was issued Louisiana Pollutant Discharge Elimination System (LPDES) Permit LA0083216 on May 22, 2015, with an effective date of July 1, 2015. LPDES Permit LA0083216 will expire on June 30, 2020. Under the terms and conditions of LPDES Permit LA0083216, the Respondent is permitted to discharge sanitary wastewater, stormwater runoff, and shop, dock, truck, refrigerated box, equipment, and warehouse washdown water, into local drainage ditch, thence into the Mississippi River (070301), all waters of the state.			
	<b>Date of Violation</b>	<b>Description of Violation</b>		
II.	Inspection(s) & File Review 8/31/2018 2/21/2019	The Respondent failed to comply with LPDES permit LA0083216. Specifically, between July 2016 and December 2018, the Respondent reported exceedances of permit effluent limitations for Fecal Coliform, TSS, and BODs for Outfall 101 as summarized in Table 1. (LA0083216 (Effluent Limitations and Monitoring Requirements, Page 1 of 5 and Standard Conditions A.2), La. R.S. 30:2076(A)(3), and LAC 33:IX.501.A)		
III.	Inspection(s) & File Review 8/31/2018 2/21/2019	The Respondent failed to sample the effluent from Outfall 002 on a quarterly basis as required by LPDES Permit LA0083216. Specifically, Outfall 002 has not had a sample taken for analysis from July of 2015 through December of 2018 as indicated in the comments section of submitted DMRs and communicated to inspector during the inspection. (LA0083216 (Effluent Limitations and Monitoring Requirements, Page 3 of 5 and Standard Conditions A.2), La. R.S. 30:2076(A)(3), and LAC 33:IX.501.A)		
IV.	Inspection(s) & File Review 8/31/2018 2/21/2019	The Respondent failed to submit Discharge Monitoring Reports (DMRs) in a timely manner. The Respondent is required to submit quarterly DMRs no later than the 28th day of the month following each quarterly monitoring period. Specifically, the Respondent did not submit timely DMRs for the following quarterly monitoring periods: Quarters 3 and 4 of 2017 and Quarters 1 and 3 of 2018. In each of these monitoring periods, DMR's for both Outfall 101 and Outfall 002 were submitted late. (LA0083216 (Effluent Limitations and Monitoring Requirements 5-1, Pages 1 and 3 of 5 and Standard Conditions A.2 and D.4), La. R.S. 30:2076(A)(3), and LAC 33:IX.2701.L.4)		
V.	Inspection(s) & File Review 8/31/2018 2/21/2019	The Respondent failed to comply with LPDES permit LA0083216. Specifically, the Respondent failed to submit quarterly Discharge Monitoring Reports (DMRs) for the monitoring periods of Quarter 3 of 2015 through Quarter 2 of 2017 for Outfall 002 and Quarter 2 of 2018 for both Outfall 101 and Outfall 002. (LA0083216 (Effluent Limitations and Monitoring Requirements 5-1, Pages 1 and 3 of 5 and Standard Conditions A.2 and D.4), ( La. R.S. 30:2076(A)(3), and LAC 33:IX.2701.L.4)		
VI.	Inspection(s) 8/31/2018	The Respondent failed to properly operate and maintain systems of treatment and control. Specifically, vegetation prevented the inspector from locating Outfall 002. According to the inspection report, the facility did not know the exact location of Outfall 002 because it had never been sampled. (LA0083216 (Standard Conditions, Sections A.2 and B.3.a), La. R.S. 30:2076(A)(3), and LAC 33:IX.2701.E) See photo 4 of 4 from 8/31/2018 inspection.		
<b>ORDER</b>				
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 <b>COMPLIANCE ORDER</b> , 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 <b>COMPLIANCE ORDER</b> , 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 <b>COMPLIANCE ORDER</b> . This report and all other reports or information required to be submitted to the Enforcement Division by this <b>COMPLIANCE ORDER</b> shall be submitted to the Department at the address specified in this document.			
III.	To submit a completed NetDMR Subscriber Agreement to the Department for approval to submit DMRs electronically using NetDMR, within thirty (30) days after receipt of this <b>COMPLIANCE ORDER</b> . The Subscriber Agreement shall be signed and dated with an original signature and submitted to the Enforcement Division. (NetDMR is accessed through: <a href="http://www.epa.gov/netdmr">www.epa.gov/netdmr</a> . For assistance establishing and maintaining a NetDMR account or for NetDMR training, see attached instructions or contact the Permit Compliance Unit at <a href="mailto:deqnetdmr@la.gov">deqnetdmr@la.gov</a> .)			
IV.	To submit DMRs and associated reports electronically using NetDMR beginning with the first monitoring period after approval of the NetDMR Subscriber Agreement unless otherwise notified in writing by the Department.			



V. To submit to the Enforcement Division, within thirty (30) days after receipt of this **COMPLIANCE ORDER**, properly completed DMR's for Outfall 002 for the monitoring periods Quarter 3 of 2015 through Quarter 2 of 2017 and for Outfalls 101 and 002 for the monitoring period Quarter 2 of 2018 mentioned in Paragraph V of the "Findings of Fact" portion of this Order. If you are submitting copies of DMRs, please be advised that each copy of the DMR shall be signed and certified. 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."

**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 **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 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 Kevin Foy at (225) 219-3485 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. 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 **CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY** 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: Kevin Foy	<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-18-00392 Agency Interest No. 18632
<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 CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY**

- To appeal the **CONSOLIDATED COMPLIANCE ORDER AND NOTICE OF POTENTIAL PENALTY**, the Respondent must follow the guidelines set forth in the "Right to Appeal" portion of this **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 **COMPLIANCE ORDER** by completing the attached "**CONSOLIDATED COMPLIANCE ORDER AND NOTICE OF POTENTIAL PENALTY REQUEST TO CLOSE**" form and returning it to the address specified.
  - Before requesting closure of the **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 "**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.

If you have questions or need more information, you may contact Kevin Foy at (225) 219-3485 or [Kevin.Foy@la.gov](mailto:Kevin.Foy@la.gov).

  
\_\_\_\_\_  
Lourdes Iturralde


Assistant Secretary  
Office of Environmental Compliance

Date: 3-8-19

cc: Public Health Chief Engineer  
Office of Public Health  
Department of Health

Attachment(s)  
- Request to Close  
- Table 1



LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY OFFICE OF ENVIRONMENTAL COMPLIANCE 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-18-00392	Contact Name	Kevin Foy
Agency Interest (AI) No.	18632	Contact Phone No.	(225) 219-3485
Alternate ID No.	LA0083216		
Respondent:	Riverside Food Distributors, LLC	Facility Name:	F. Christiana and Company
	c/o C T Corporation System	Physical Location:	7251 River Road
	Agent for Service of Process		
	3867 Plaza Tower Dr	City, State, Zip:	Marrero, LA 70073
	Baton Rouge, LA 70816	Parish:	Jefferson Parish
<b>STATEMENT OF COMPLIANCE</b>			
STATEMENT OF COMPLIANCE		Date Completed	Copy Attached?
A written report was submitted in accordance with Paragraph II of the "Order" portion of the COMPLIANCE ORDER.			
All necessary documents were submitted to the Department within 30 days of receipt of the COMPLIANCE ORDER in accordance with Paragraph(s) III and V of the "Order" portion of the COMPLIANCE ORDER.			
Submitted DMRs and associated reports electronically using NetDMR in accordance with Paragraph IV of the "Order" portion of the COMPLIANCE ORDER.			
All items in the "Findings of Fact" portion of the COMPLIANCE ORDER were addressed and the facility is being operated to meet and maintain the requirements of the "Order" portion of the COMPLIANCE ORDER. Final compliance was achieved as of:			
<b>SETTLEMENT OFFER (OPTIONAL)</b>			
<i>(check the applicable option)</i>			
<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.Subpart1.Chapter7.		
<input type="checkbox"/>	In order to resolve any claim for civil penalties for the violations in NOTICE OF POTENTIAL PENALTY (WE-CN-18-00392), 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 NOTICE OF POTENTIAL PENALTY (WE-CN-18-00392), 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>• DO NOT SUBMIT PAYMENT OF THE OFFER WITH THIS FORM- 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 NOTICE OF POTENTIAL PENALTY (WE-CN-18-00392) and has attached a justification of its offer and a description of any BEPs if included in settlement offer.		
<b>CERTIFICATION STATEMENT</b>			
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
<b>MAIL COMPLETED DOCUMENT TO THE ADDRESS BELOW:</b>			
Louisiana Department of Environmental Quality Office of Environmental Compliance Enforcement Division Post Office Box 4312 Baton Rouge, LA 70821 Attn: Kevin Foy			

If you have questions or need more information, you may contact Kevin Foy at (225) 219-3485 or Kevin.Foy@la.gov.

Table 1: Permit Limit Exceedances Outfall 101

Monitoring Period	Parameter	Permit Limit	Measured Value
Quarter 3 2016	Fecal Coliform	400 col/100 mL Daily Max	1360 col/100 mL
		200 col/100 mL Monthly Avg	1360 col/100 mL
Q4 2016	Fecal Coliform	400 col/100 mL Daily Max	920 col/100 mL
		200 col/100 mL Monthly Avg	920 col/100 mL
Quarter 1 2017	Fecal Coliform	400 col/100 mL Daily Max	2420 col/100 mL
		200 col/100 mL Monthly Avg	2420 col/100 mL
Quarter 2 2017	Fecal Coliform	400 col/100 mL Daily Max	727 col/100 mL
		200 col/100 mL Monthly Avg	727 col/100 mL
Quarter 3 2017	Fecal Coliform	400 col/100 mL Daily Max	866 col/100 mL
		200 col/100 mL Monthly Avg	866 col/100 mL
Quarter 4 2017	TSS	30 mg/L Monthly Avg	32 mg/L
Quarter 1 2018	Fecal Coliform	400 col/100 mL Daily Max	>2,419.6 col/100 mL
		200 col/100 mL Monthly Avg	>2,419.6 col/100 mL
	TSS	45 mg/L Daily Max	110 mg/L
		30 mg/L Monthly Avg	110 mg/L
	BOD <sub>5</sub>	45 mg/L Daily Max	69 mg/L
		30 mg/L Monthly Avg	69 mg/L
Quarter 4 2018	Fecal Coliform	400 col/100 mL Daily Max	2,419.6 col/100 mL
		200 col/100 mL Monthly Avg	2,419.6 col/100 mL
	TSS	45 mg/L Daily Max	57 mg/L
		30 mg/L Monthly Avg	57 mg/L
	BOD <sub>5</sub>	45 mg/L Daily Max	106 mg/L
		30 mg/L Monthly Avg	106 mg/L